MILLIMAN RESEARCH REPORT

Analysis of non-life insurers' Solvency and Financial Condition Reports

United Kingdom and Gibraltar non-life insurers

Year-end 2017

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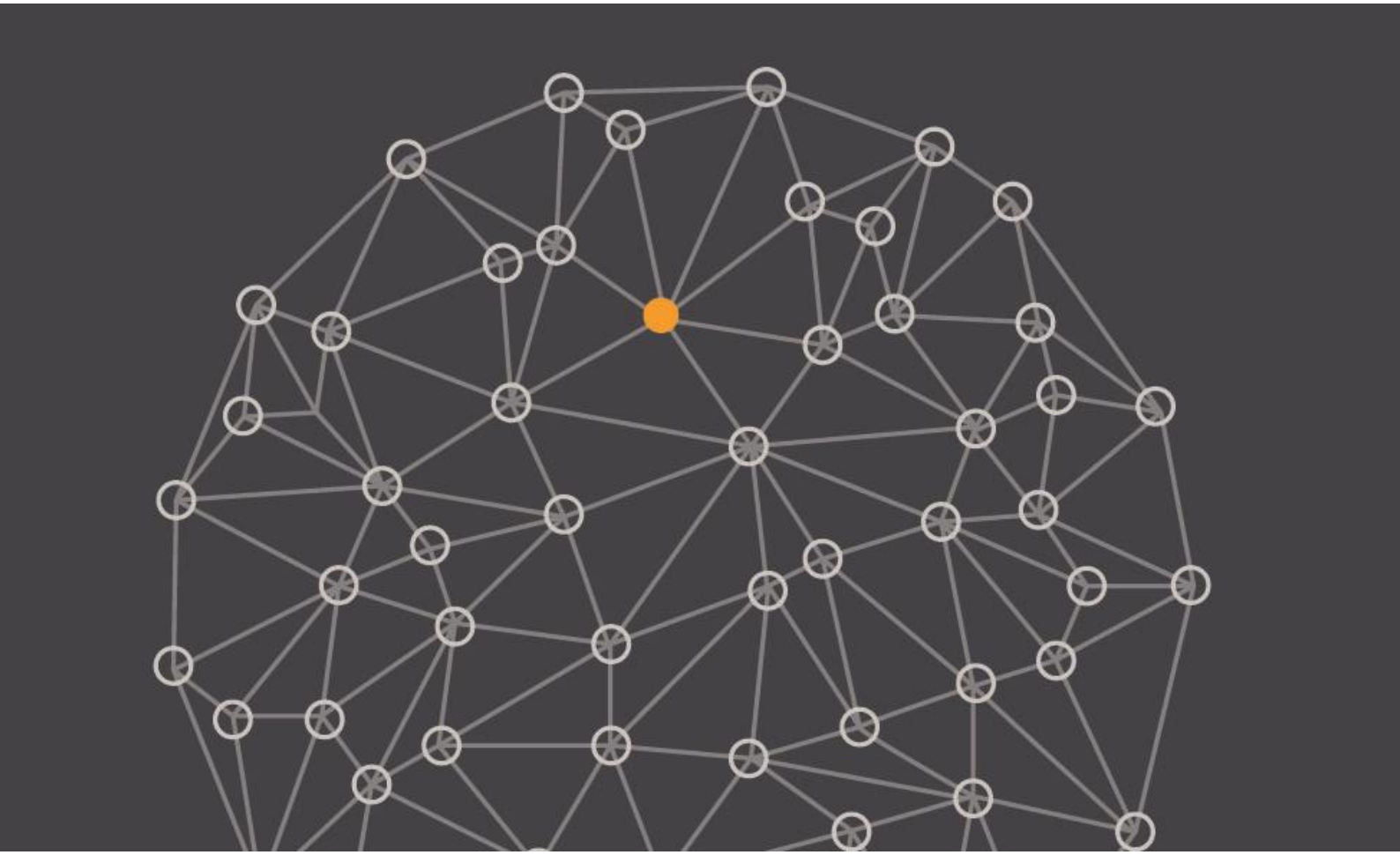

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Introduction

Two years have passed: Where are we?

Following the initial publication in 2017, in 2018 (re)insurance undertakings across the EU published their second set of Solvency II public reports, the Solvency and Financial Condition Reports (SFCRs). In this report, we summarise those SFCRs as they relate to non-life insurers regulated in the UK or in Gibraltar, and set out the results of our analyses of the reports. This includes comparison of the 2017 year-end SFCRs with the 2016 year-end SFCRs.

The analyses underlying this report focus on the quantitative information contained in the Quantitative Reporting Templates (QRTs) within the SFCRs, but we have also studied the text within the SFCRs in order to gain additional insights into various companies, in particular those that displayed characteristics that differed materially from the market average. Our focus is on solo entities rather than groups.

Our report is laid out as follows:

- We first analyse the solvency position of the market as a whole, before taking a closer look at the top 30 players, by gross written premium (GWP).
- We then look at the components of the Solvency Capital Requirement (SCR), for the market as a whole and individually for the top 30, and the quality of the components of the own funds.
- Our report continues with an analysis of the main Solvency II balance sheet items, including invested assets and technical provisions.
- Finally, we look at some underwriting key performance indicators, such as loss ratios and operating margins split by Solvency II line of business.

UNITED KINGDOM MARKET COVERAGE

Our analyses are based upon the SFCRs for 151 solo companies which are pursuing primarily non-life business in the UK and which are regulated in either the UK or Gibraltar. In aggregate, these companies represent over 90% of the GWP of the UK non-life direct market.

The Society of Lloyd's produces a single publicly available SFCR, covering in aggregate all of its syndicates. We have excluded it from our study, because of its size compared with the rest of the market, and due to much of its activities relating to insurance coverage outside of the UK, and to its containing much reinsurance and retrocessional business. The Society of Lloyd's represents £34 billion of GWP and £53 billion of gross technical provisions (compared with a total £61 billion of GWP and £95 billion of gross technical provisions for the 151 solo companies that we analysed), and exhibits a solvency coverage ratio of 144% (made up of £24 billion of eligible own funds and over £17 billion of SCR).

Appendix A contains a list of all of the companies that were included in our analysis.

The data analysed in this report has been sourced from Solvency II Wire Data and companies' disclosed SCFRs. The data is available via subscription from: https://solvencyiiwiredata.com/about/

United Kingdom (incl. Gibraltar) non-life undertakings

SOLVENCY COVERAGE RATIOS: HOW DID THE MARKET DO? HOW SOLVENT IS THE MARKET?

FIGURE 1: UK SOLVENCY COVERAGE RATIOS AS AT THE 2017 YEAR-END

	2017 YEAR-END
RATIO OF ELIGIBLE OWN FUNDS TO SCR	161%
RATIO OF ELIGIBLE OWN FUNDS TO MCR	465%
MCR AS A % OF THE SCR	35%

In aggregate, the UK non-life insurers that comprised our sample are sufficiently capitalised, with an average (weighted by eligible own funds) solvency coverage ratio of 161%. This has increased from the equivalent figure of 150%, reported in the previous set of SFCRs as at 2016 year-end. The Minimum Capital Requirement (MCR) coverage ratio has similarly increased from 448% to 465%.

There is a wide range of solvency coverage ratios as at the 2017 year-end, with several insurers being very well capitalised (with solvency ratios well over 250%) but also with five insurers whose solvency coverage ratios were below 100% (Ambac Assurance UK Limited, CX Reinsurance Company Limited, Equitas Insurance Limited, FGIC UK Limited and Municipal Mutual Insurance Limited).

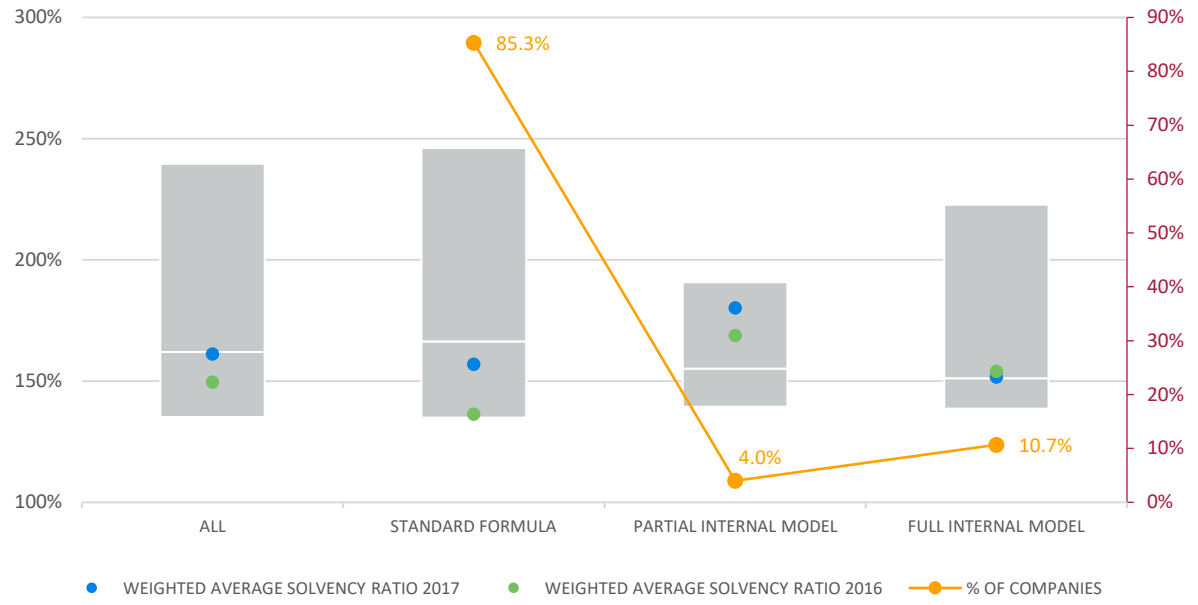
We note that four insurers that were in breach of their solvency coverage ratios as at 2016 year-end have restored their solvency coverage ratios to over 100% as at 2017 year-end. Of these, Ageas Insurance Limited (from 91% to 131%) and Zenith Insurance PLC (from 69% to 151%) both benefited from significant capital injections, whereas the improved solvency coverage ratios for Evolution Insurance Company Limited (from 91% to 101%) and Guarantee Insurance Protection Limited (from 88% to 140%) were mainly driven by lower SCRs.

We also note that a few companies display solvency coverage ratios of more than 10 times their regulated capital requirements. In the main, they are small entities within major insurance groups, such as Palatine Insurance Ltd (Swiss Re), R&Q Gamma Company Ltd (R&Q) and The Ocean Marine Insurance Company Ltd (Aviva).

The Standard Formula (SF) remains the preferred capital model for most insurers (more than 85% of the insurers included in our sample). Of those that did not use the SF, 16 have used a full internal model (FIM) and six a partial internal model (PIM). Not surprisingly, we note that those insurers using a PIM have used it predominantly to model the underwriting risk.

These findings are illustrated in Figure 2, which shows how the solvency coverage ratios are distributed throughout the 151 insurers we analysed. It sets out the median, 25th and 75th percentiles and weighted average of the distribution of the solvency coverage ratios for the market as a whole and then separately for insurers using either the SF, PIM or FIM. We note that the median of the solvency coverage ratios is broadly similar whether using a PIM (155%) or a FIM (151%), but, surprisingly, is higher when using the SF (166%). Overall, firms using the SF have improved their overall solvency coverage ratios on (weighted) average by about 21%, from 136% to 157%, whereas companies using PIMs have increased theirs by 11% (from 169% to 180%) and companies using FIMs have broadly maintained theirs (a slight decrease from 154% to 152%). The undercapitalised companies mentioned above are all using the SF to derive their capital requirements.

FIGURE 2: DISTRIBUTION OF SOLVENCY COVERAGE RATIOS AT 2017 YEAR-END



By design, the MCR is 'calibrated' to be the 85th percentile of the distribution of own funds over a one-year period. It means that, technically, insurers are 15% likely to suffer a deterioration in own funds of a magnitude equal to or greater than the amount of the MCR. Should such a situation occur, nearly 20% of the firms within our sample would see their solvency coverage ratios falling to levels below 100%.

Figure 3 shows the capital requirement for the 30 largest companies (in terms of GWP). Companies are ranked based on their coverage ratios.

FIGURE 3: SOLVENCY COVERAGE RATIO AFTER A LOSS EQUAL TO THE MCR, GWP TOP 30

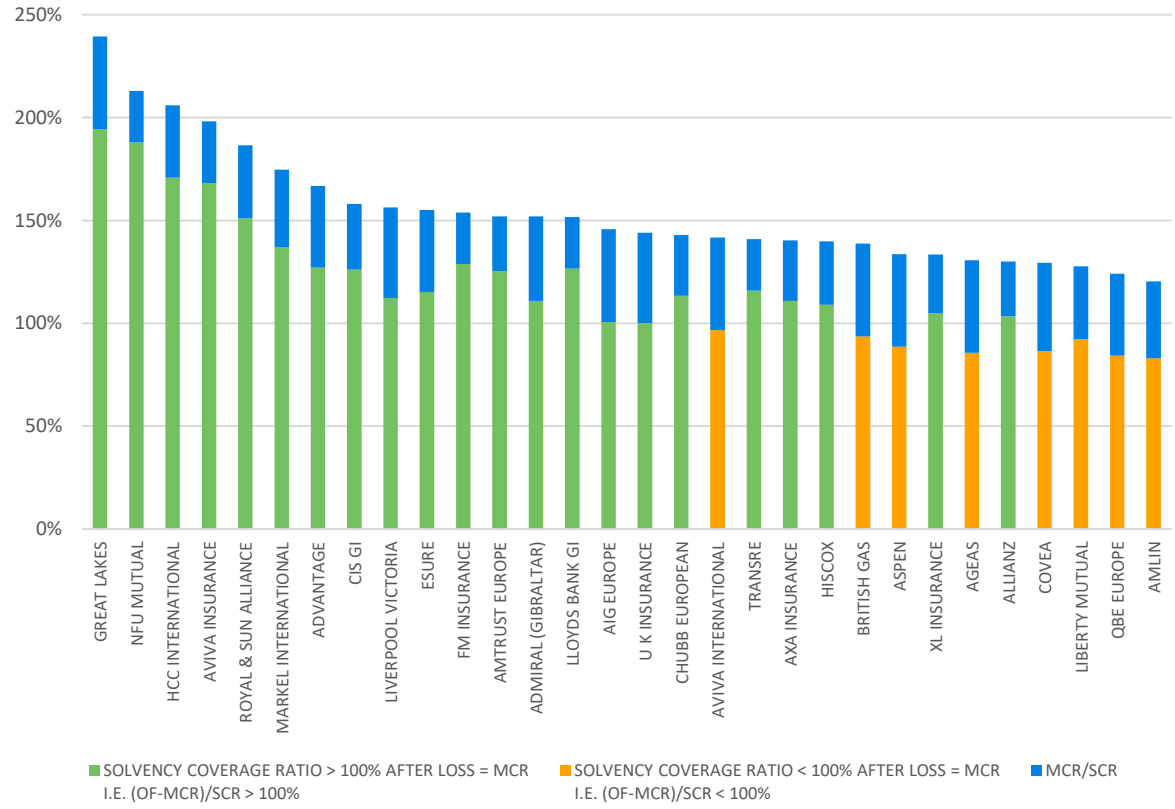
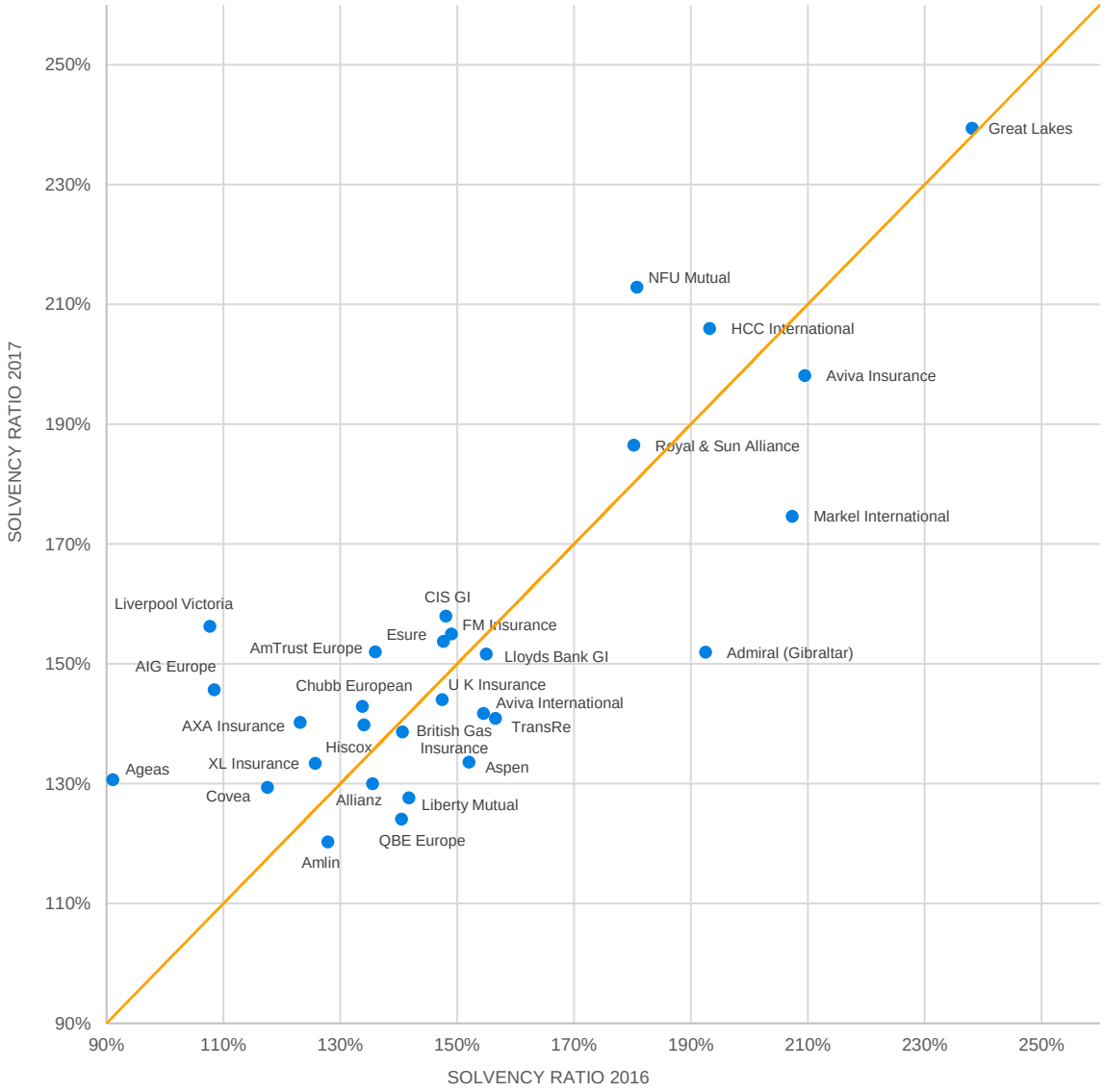


Figure 4 shows how the solvency coverage ratios have changed between the 2016 and 2017 year-ends for the top 30 companies (in terms of GWP) included in our sample.

FIGURE 4: SOLVENCY COVERAGE RATIOS 2016 AND 2017, GWP TOP 30



For those companies above the diagonal line, the solvency coverage ratios have strengthened between the 2016 and 2017 year-ends, whereas the solvency coverage ratios for those companies below the line have weakened over the 12-month period.

We note that most of the top 30 firms exhibit a solvency ratio between 120% and 170%. We comment below on companies that saw movements in their solvency coverage ratios greater then +/- 30%.

The solvency ratio for Ageas (131% as at year-end 2017) has increased by 40% since year-end 2016. This is largely due to a capital injection of £50 million but also to a decrease in the SCR (from £555 million to £414 million, resulting from the purchase of a whole account stop-loss treaty, with effect from 1 April 2017, and the de-risking of the bond portfolio).

Liverpool Victoria experienced a significant increase of its solvency ratio between 2016 and 2017. This was mainly due to a £153 million increase of the eligible own funds, driven by strong underwriting results, by investment income from subsidiaries companies and by the sale of the commercial lines renewal rights. This was combined with a £35 million decrease of the capital requirement, largely due to the increased profitability over 2017 and the resulting increase in the loss-absorbing capacity of deferred tax (LACDT).

AIG's solvency ratio of 148% increased significantly from 108% last year. AIG's SCR has decreased from £3.4 billion as at the 2016 year-end to £2.5 billion as at the 2017 year-end. We note that AIG's SCR as at year-end 2017 is based upon a FIM, whereas as at the 2016 year-end it had been based on the SF. We suspect that this change in approach is the cause of much of the decrease in the SCR.

The solvency ratio for Admiral (Gibraltar) decreased significantly, from 193% as at year-end 2016 to 152% as at year-end 2017. The SCR increased by £10 million over the period following the growth of all the Admiral Group's insurance business. In addition, eligible own funds reduced by almost £100 million, largely because of a dividend payment of £120 million.

Markel International saw its solvency coverage ratio decreasing from 207% as at year-end 2016 to 175% as at year-end 2017, due to a combination of a higher SCR (£272 million compared with £239 million) and lower eligible own funds (£475 million compared with £496 million). These movements are partially explained by underwriting losses arising from natural catastrophe events during 2017 and the change in Ogden rates which would have negatively affected the reconciliation reserve (and thus the own funds) and increased the reserve risk.

ANALYSIS OF SCR AND MCR: WHERE IS THE RISK?

When conducting their SCR calculations, insurers have to cover all the risks that may affect their balance sheets and, consequently, their solvency positions. Figure 5 shows, on an aggregated basis, the breakdown of the SCR for firms using the SF. As expected, underwriting risk is the greatest risk for UK non-life insurers, comprising on average 68% of the overall SCR (before the application of any diversification benefits).

FIGURE 5: SCR BREAKDOWN BY RISK MODULE: FIRMS USING STANDARD FORMULA ONLY

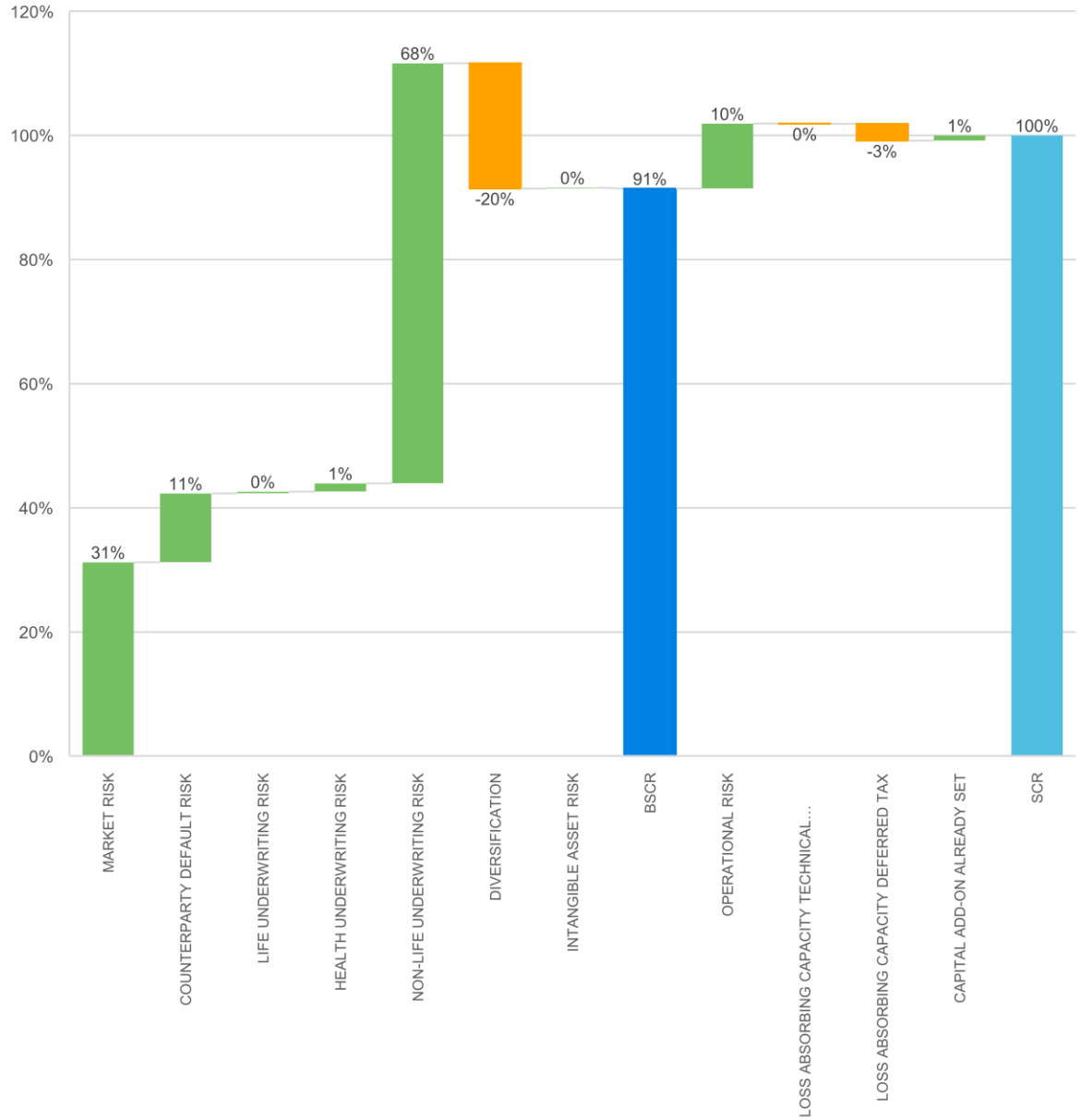
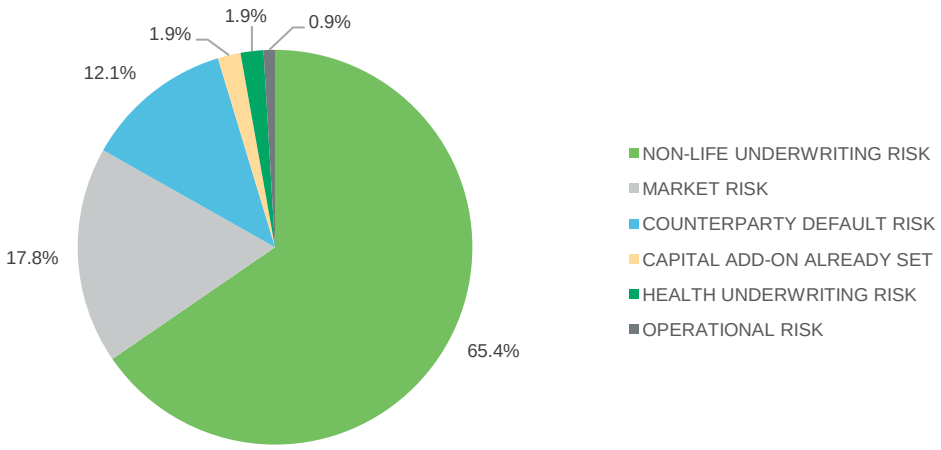


Figure 6 corroborates the above comment, by showing that, for about 65% of the companies in our sample, the underwriting risk is the most expensive in terms of capital, with market risk being the main contributor to the SCR for a further 18% of the companies.

FIGURE 6: PERCENTAGE OF COMPANIES AND LARGEST RISK AREA: FIRMS USING STANDARD FORMULA ONLY



We note that the Prudential Regulation Authority (PRA) has barely used its power—under Section 55M of the Financial Services Market Act 2000—to apply a capital add-on in cases where it deems there to be a significant risk issue or governance deviation from Solvency II requirements. Overall, on average capital add-ons represent less than 0.5% of the total SCR (1% for firms under SF only as shown above). In most cases, for companies under SF, the capital add-on is required because the SF does not capture, fully and/or appropriately, the risks to which the company is exposed.

However, amongst the companies using the SF, four insurers were required to include significant capital add-ons, contributing materially to their SCRs. The capital add-ons for two of them—Flood Re and Tradex—were the largest contributors to their total SCRs.

- **Flood Re:** Until the PRA approves its PIM, Flood Re has to hold a capital add-on. As at year-end 2017, this capital add-on was £22.3 million (45% of Flood Re's overall SCR).
- **Tradex** voluntarily added a £9 million (39% of its overall SCR) capital add-on to its solvency capital requirement in respect of its reinsurance arrangements. Following changes in its accounting approach, Tradex has agreed with the PRA that, from 2018 onwards, this capital add-on will no longer be necessary.
- **TransRe** has a £50 million (19% of its overall SCR) capital add-on, as the SF does not reflect adequately its risk profile in respect of natural catastrophe risk and catastrophe risk relating to its non-proportional property reinsurance portfolio. This capital add-on follows a voluntary application by TransRe to the PRA. TransRe is currently in the process of building a PIM which is intended to reflect its risk profile better than the SF.
- **OneRe**'s capital add-on of £2.5 million (19% of its overall SCR) had been added voluntarily, to address data insufficiency as well as certain aspects of the SF.

We also note that British Gas Insurance (which uses a PIM in evaluating its SCR) holds a capital add-on of £35 million (44% of its overall SCR) to allow for a possible inappropriateness of the SF in reflecting its counterparty and operational risks. British Gas Insurance has indicated in its SFCR that, in March 2018, it applied to the PRA for approval to extend its PIM to incorporate both counterparty default risk and operational risk.

Finally, AIG Europe (which uses a FIM in evaluating its SCR) was set £120 million of capital add-on following the approval by the PRA of its FIM. The add-on relates to planned underwriting profit.

From the above we note that capital add-ons are generally set in agreement with the regulator. In addition, companies that have a capital add-on requirement have disclosed their intentions to develop further their risk calculations in order to reflect better their respective risk profiles and hence negate the need for any add-on in the future.

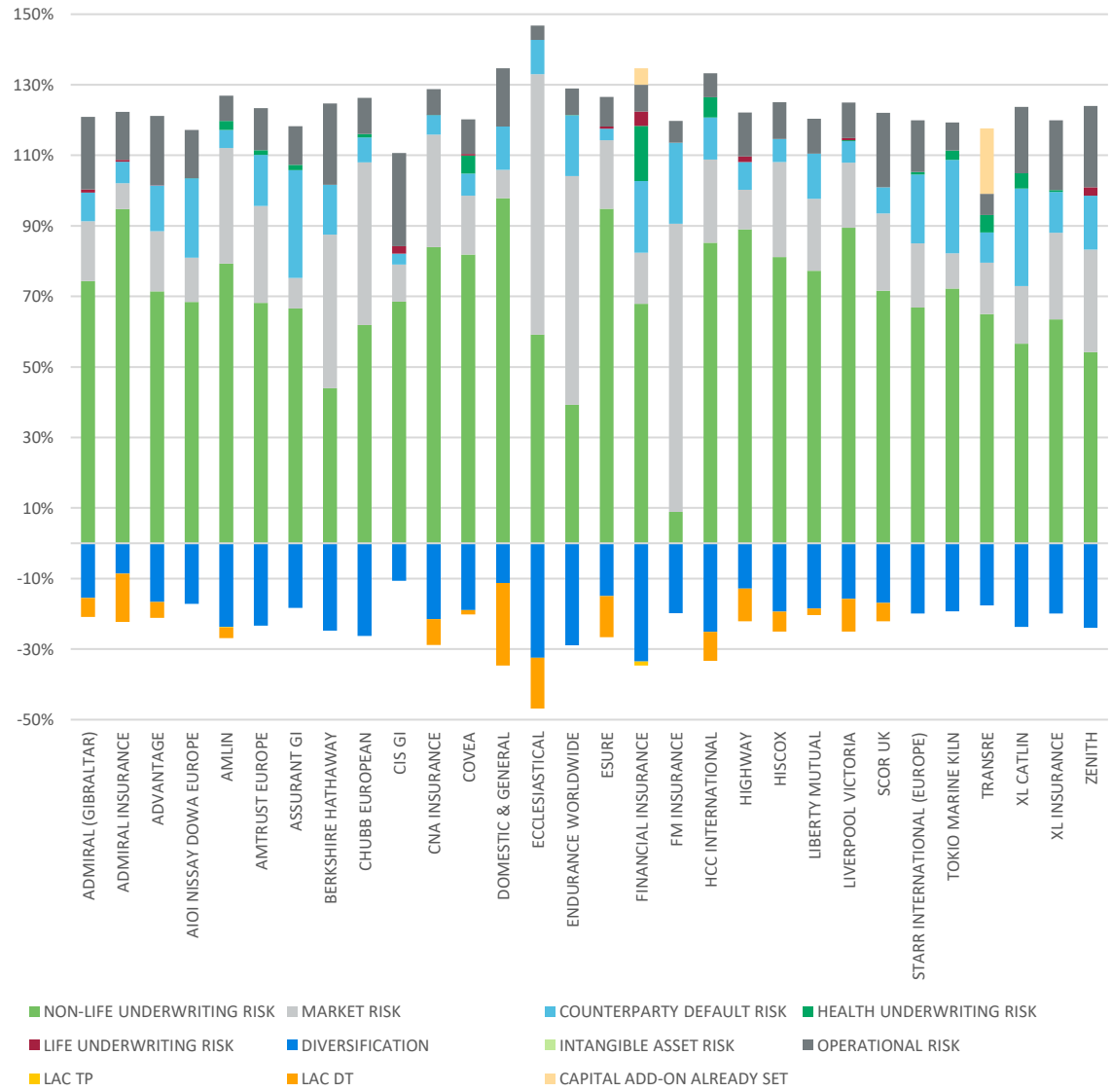
However, most of the companies have exercised the option within Solvency II to limit temporarily the public disclosure of capital add-on information. Greater transparency is expected in future regarding capital add-ons, as such information will be publicly available in the UK from 2018 year-end onwards (2020 at the latest for the other member states).

We also note that adjustments for the LACDT (which reduce the SCRs) totalled £920 million as at year-end 2017, of which £315 million relates to companies using the SF. The Solvency II balance sheet indicates that the net deferred tax liabilities1 for the whole market were £653 million. Therefore, £267 million of the LACDT arose from either tax rules that allow companies to carry back the 1-in-200-year instantaneous loss against taxable profit in the prior 12-month tax period or from expected tax payable on future profits (following a 1-in-200-year instantaneous loss) over a reasonable timeframe.

In Figure 7, we show the breakdown of SCRs for the 30 largest companies (in terms of GWP) within our sample that use the SF. While underwriting risk is the predominant risk for most of the biggest firms, market risk seems to attract a higher capital charge for a handful of insurers.

The counterparty default risk remains a low risk for UK non-life insurers, most of them having secured the bulk of their outwards reinsurance from well-rated carriers and most having few bad debts.

FIGURE 7: SCR BREAKDOWN BY RISK MODULE AND BY COMPANY, GWP TOP 30 (SF ONLY)



1 We define net deferred tax liabilities as the maximum of zero and the deferred tax liabilities less the deferred tax assets.

ANALYSIS OF OWN FUNDS

Own funds are divided into three tiers based on quality: Tier 1 capital is the highest ranking with the greatest loss-absorbing capacity, such as equity or bonds; Tier 2 funds are composed of hybrid debt; and Tier 3 comprises deferred tax assets. As shown in Figure 8, insurers' own funds are considered to be of good quality, with 93.1% classified in Tier 1.

FIGURE 8: TIERING OF OWN FUNDS

ELIGIBLE OWN FUNDS TO MEET THE SCR	
TIER 1 UNRESTRICTED	92.7%
TIER 1 RESTRICTED	0.4%
TIER 2	5.5%
TIER 3	1.4%
ELIGIBLE OWN FUNDS TO MEET THE MCR	
TIER 1 UNRESTRICTED	98.5%
TIER 1 RESTRICTED	0.4%
TIER 2	1.1%

We also note that Tier 2 own funds are slightly more common for larger insurers (in terms of GWP) that have a significant capital requirement, with 6.3% of own funds for the 30 largest companies classified as Tier 2 against 5.5% for the whole market.

For 95% of the companies we analysed, the available own funds were 100% eligible to cover the SCR.

In Figure 9, we look at the split of basic and ancillary own funds by type. It appears that basic own funds are primarily made by the reconciliation reserve (49.9%), with ordinary share capital, subordinated liabilities and deferred tax assets making up the rest.

FIGURE 9: COMPONENTS OF OWN FUNDS

	2017 YEAR-END
BASIC OWN FUNDS	
ORDINARY SHARE CAPITAL	27.1%
SHARE PREMIUM ACCOUNT RELATED TO ORDINARY SHARE CAPITAL	16.2%
SURPLUS FUNDS	0.7%
RECONCILIATION RESERVE	49.9%
OTHER BASIC OWN FUNDS	6.1%
ANCILLARY OWN FUNDS	
LETTERS OF CREDIT AND GUARANTEES	80.5%
SUPPLEMENTARY MEMBERS CALLS	9.5%
OTHER ANCILLARY OWN FUNDS	10.0%

We note in passing that the expected profits included in future premiums (EPIFP) represent 10.8% of the overall reconciliation reserve.

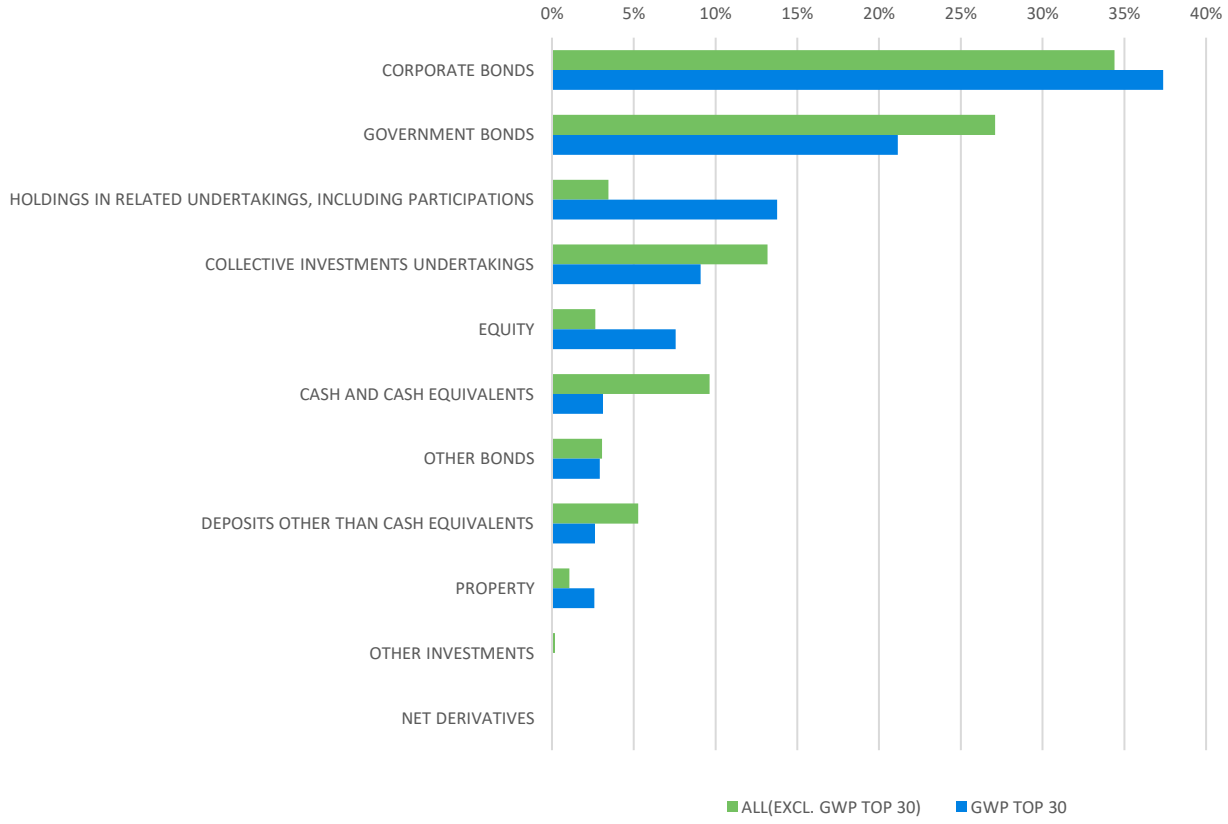
ANALYSIS OF MAIN BALANCE SHEET ITEMS

Assets

Investments in corporate and government bonds largely dominate the assets of the companies that we analysed, together accounting for more than about 60% of total investments. Beyond their attractive nature—regular payments allowing non-life insurers to match the future claims payments—such bonds are also less expensive in terms of capital than are more volatile assets such as equities.

As one would expect, larger firms hold a higher share of their invested assets in participations and equities (likely to reflect the longer duration of their liabilities) than small insurers do. On the other hand, the smaller insurers hold higher proportions of their assets in cash and deposits (more liquid and less risky assets, but providing a lower return). Figure 10 sets out the split of assets by asset class.

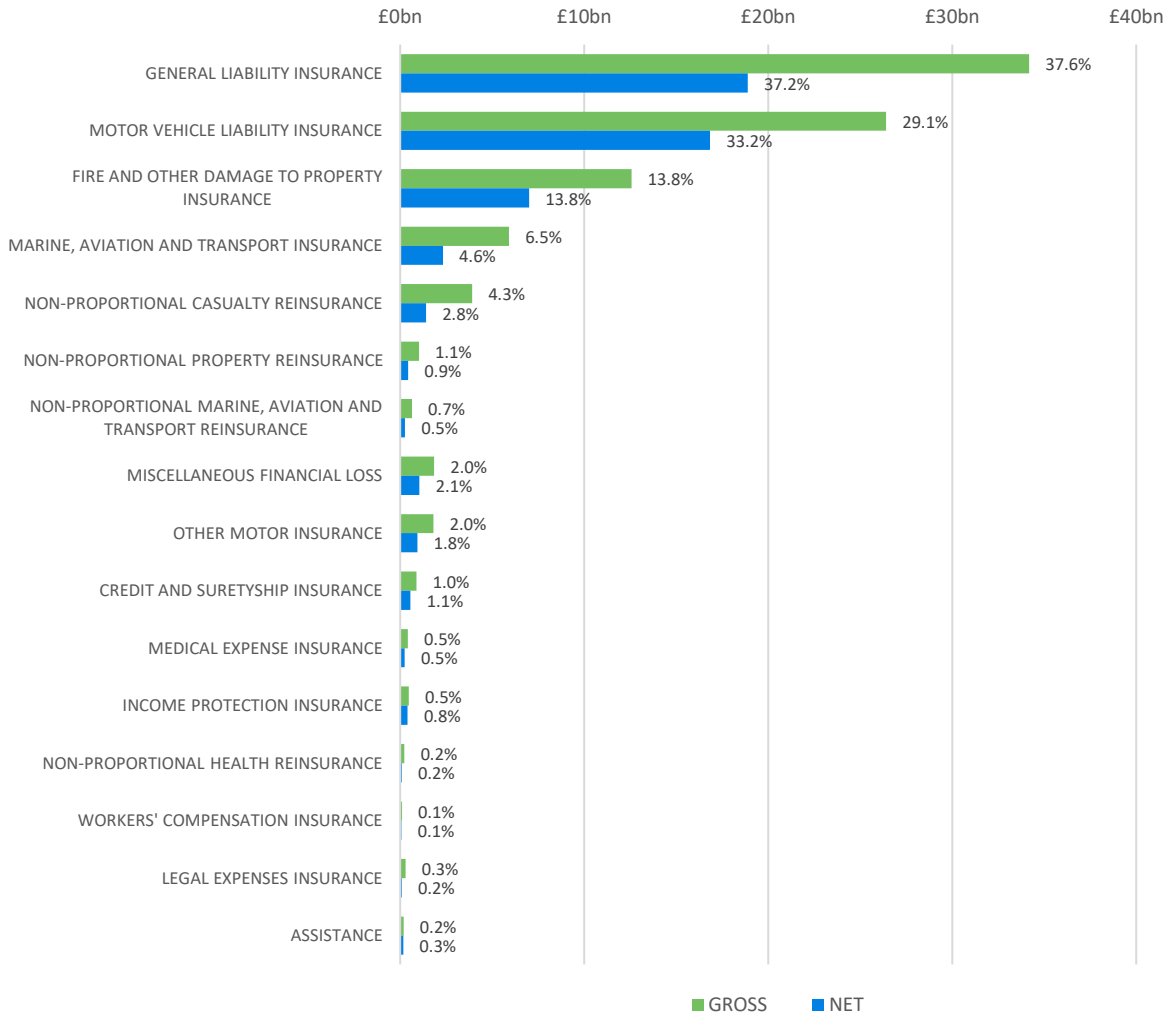
FIGURE 10: SPLIT OF INVESTMENTS BY ASSET CLASS



Technical provisions

Figure 11 shows the composition of technical provisions across non-life lines of business (as categorised under Solvency II) as at 2017 year-end.

FIGURE 11: TECHNICAL PROVISIONS SPLIT BY SOLVENCY II SEGMENTS

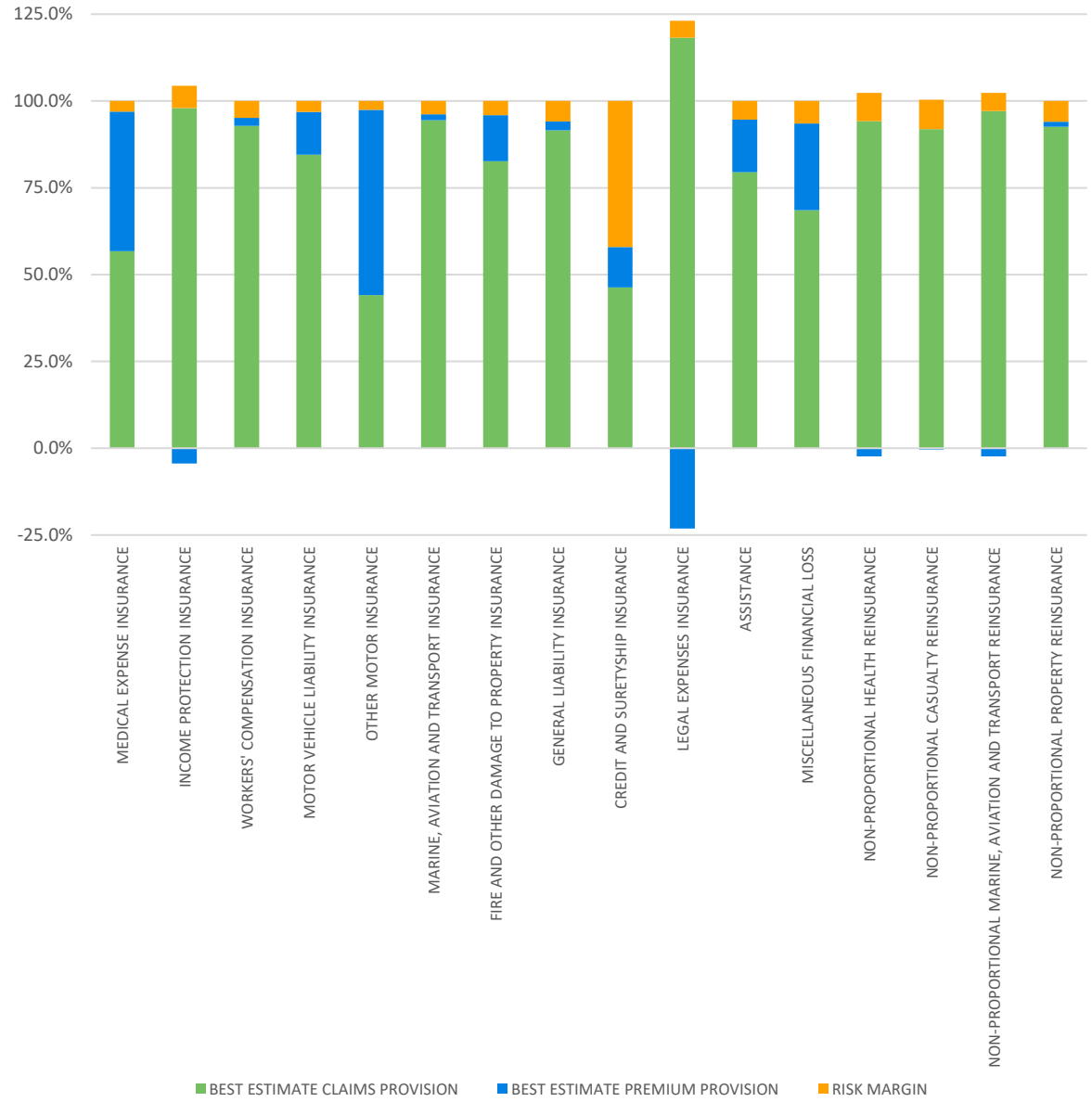


The 151 insurers included in our sample have reserved £91 billion of technical provisions (excluding the Risk Margin), gross of reinsurance, and nearly £51 billion net of reinsurance. More than 66% of the gross reserves are in respect of the long-tail business classes, general liability and motor vehicle liability.

The provisions in respect of annuities stemming from non-life insurance contracts (not included in Figure 11) reached more than £3 billion as at 2017 year-end gross of reinsurance, and slightly less than £1 billion net of reinsurance. These annuities mainly relate to Periodic Payment Order liabilities and are a key component of UK non-life firms' liabilities (ranking sixth in terms of volume of gross technical provisions).

Figure 12 sets out the component elements of the net technical provisions. It shows that, for most classes of business, the best estimate of claims provisions represents the biggest part of the Solvency II technical provisions. The best estimates shown here include allowance for claims events not in the historical data (ENIDs) and are discounted at the appropriate rate.

FIGURE 12: COMPONENTS OF NET TECHNICAL PROVISIONS



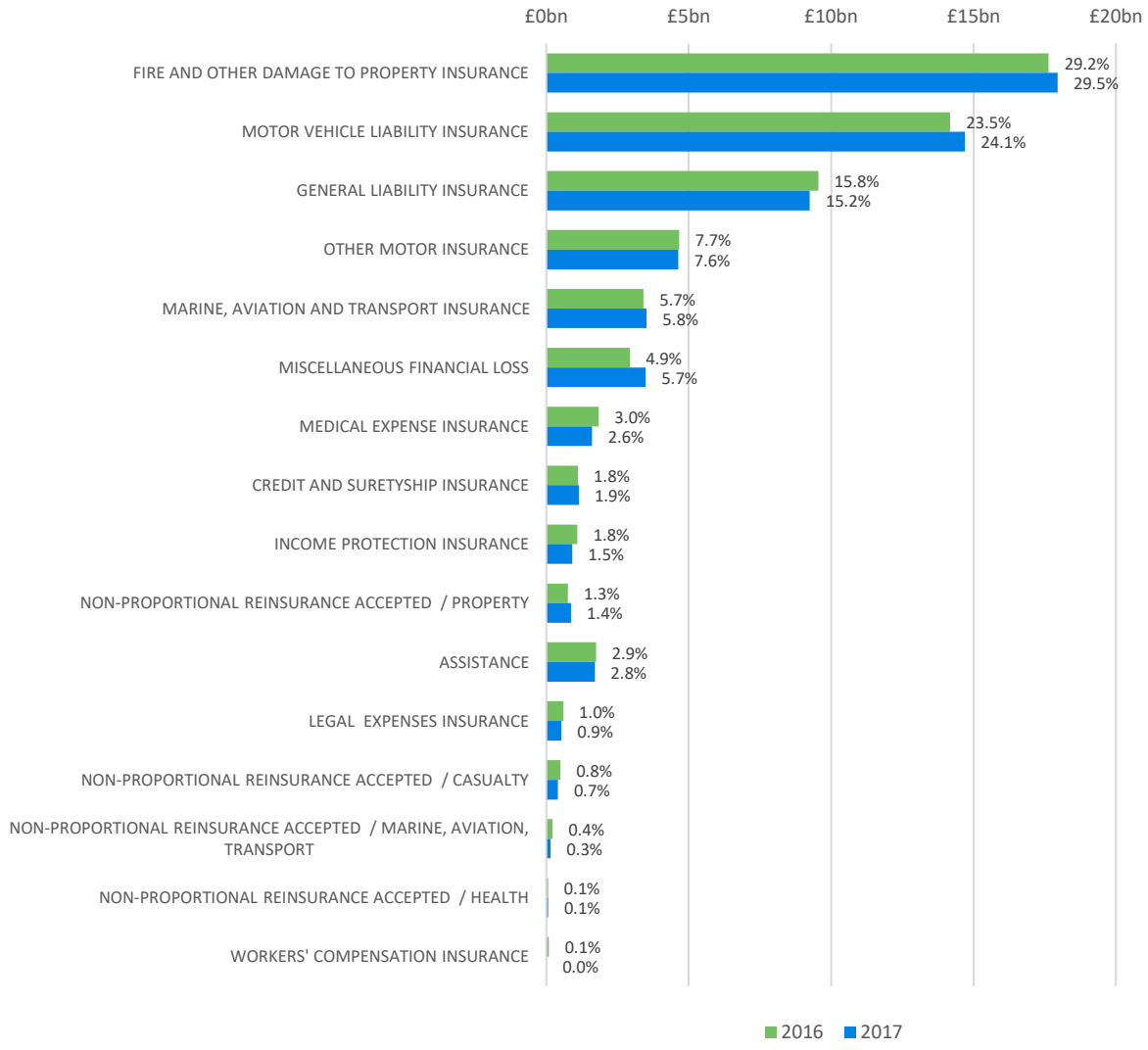
The following lines of business show negative best estimates of premium provisions: income protection; legal expenses; non-proportional health reinsurance; non-proportional property reinsurance; and non-proportional marine, aviation and transport reinsurance. On the other hand, the best estimate of premium provisions for other motor is materially higher than the best estimate of claims provisions, which reflects the short-term nature of the outstanding claims liabilities.

On an aggregated basis, the Risk Margin (RM) represents 9.3% of the net technical provisions.

ANALYSIS OF UNDERWRITING

In 2017, our sample of UK non-life insurers wrote £61 billion of gross premiums, which is comparable to the amount that they wrote in 2016. Twenty-nine percent of the premium written relates to fire and other damage covers, with 24% relating to motor liability and 16% to general liability, the last two lines being the main contributors of technical provisions. We illustrate this in Figure 13.

FIGURE 13: GROSS WRITTEN PREMIUMS BY LINE OF BUSINESS



In Figure 14, we show the gross and net of reinsurance loss ratios by line of business (sorted by GWP volumes, as per Figure 13). We note that the gross and net loss ratios for workers' compensation (the class of business for which premium volumes are smallest) go beyond the graph and reach 171% and 145%, respectively.

FIGURE 14: GROSS AND NET LOSS RATIOS BY LINE OF BUSINESS

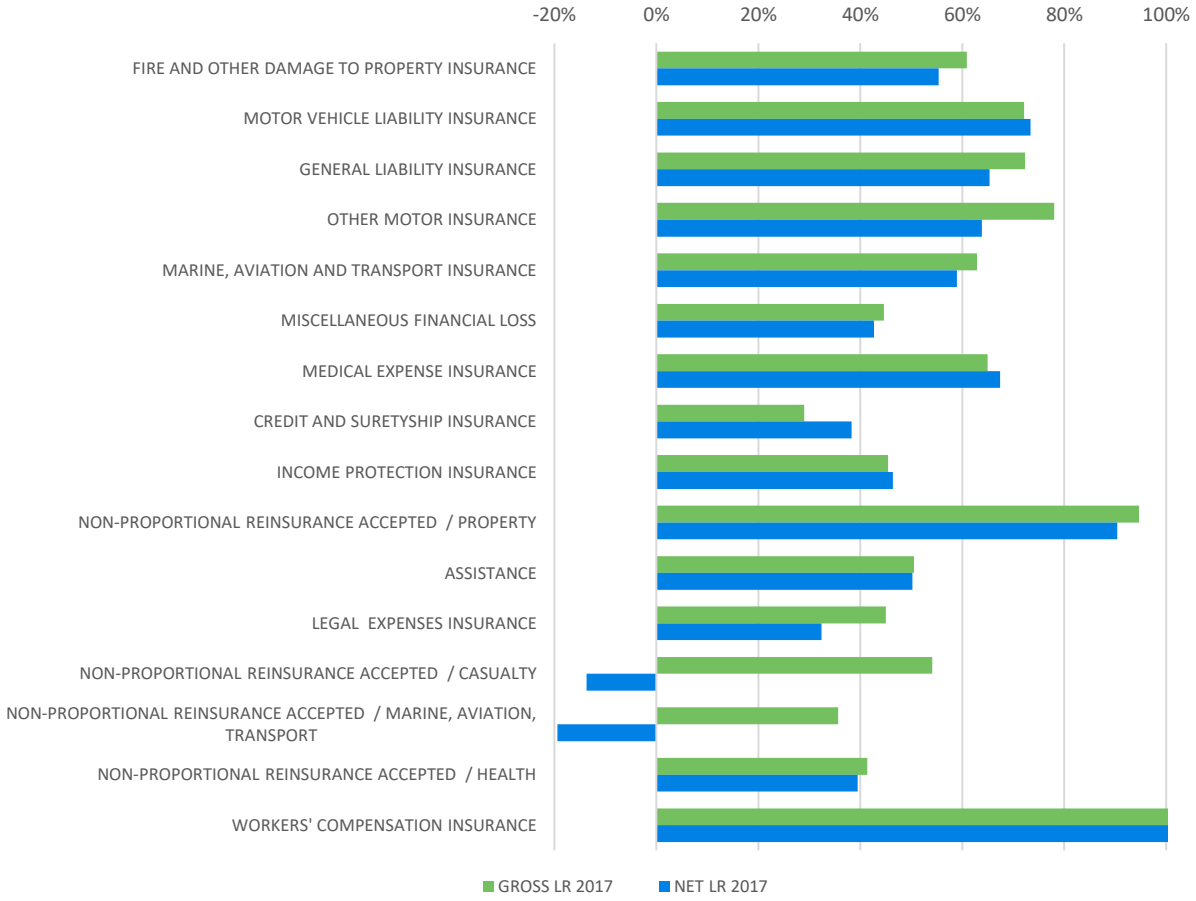
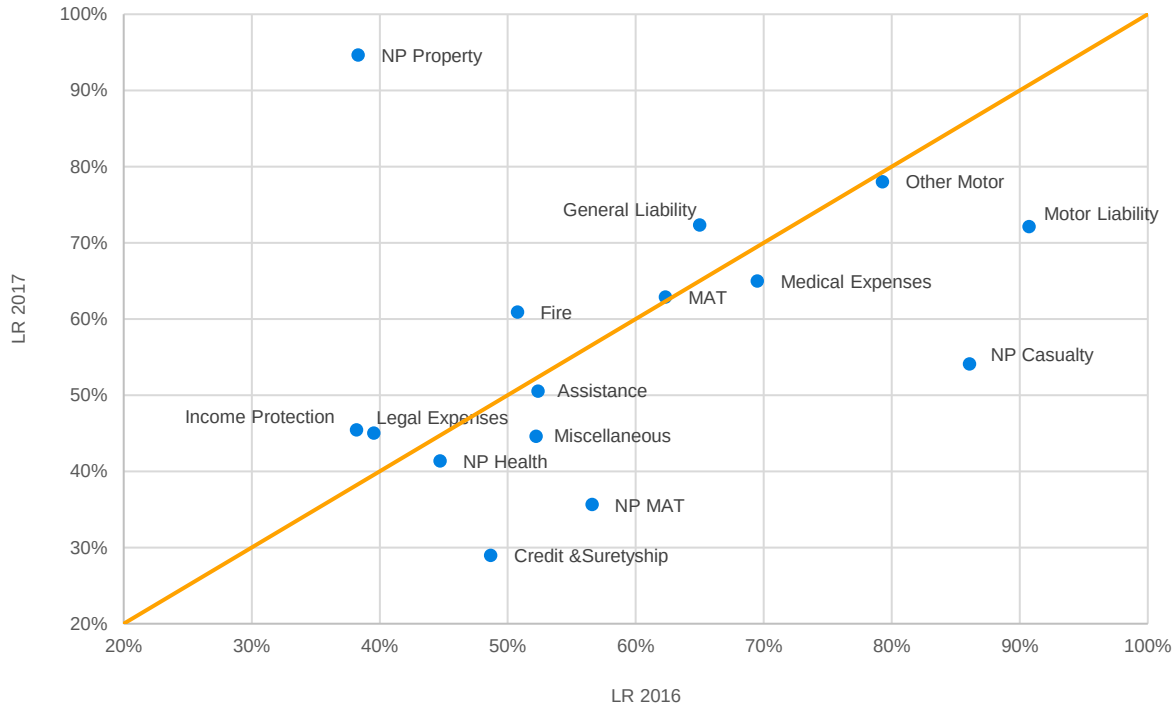


Figure 14 also indicates that, for most Solvency II lines of business, the purchase of reinsurance makes economic sense (in addition to protecting against extreme events), with the net of reinsurance loss ratios being lower than the gross loss ratios.

Figure 15 shows the changes in the gross loss ratios between year-end 2016 and year-end 2017. For those lines of business above the diagonal line, the gross loss ratios increased in 2017 relative to the equivalent gross loss ratios in 2016. Conversely, if a line of business lies below the line, its gross loss ratio reduced in 2017 relative to 2016. The loss ratios shown are on a calendar-year basis, and therefore reflect the gross loss ratio for the risks exposed during the calendar year, adjusted by any strengthening or weakening of the outstanding claims reserves relating to prior years' exposure.

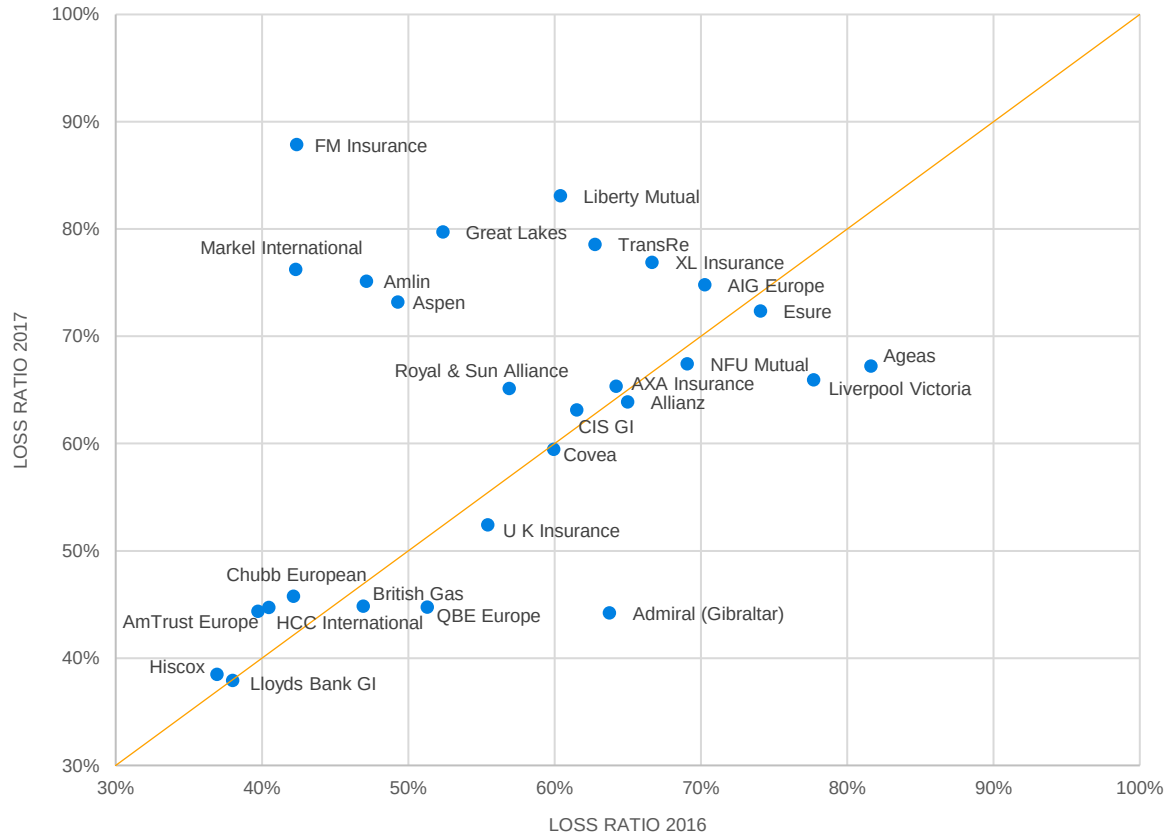
FIGURE 15: CHANGE IN GROSS LOSS RATIOS BY YEAR



We note that the gross loss ratio for motor liability decreased materially between year-end 2016 and year-end 2017, from 91% to 72%. This probably reflects both an increase in premium rates in 2017 relative to those in 2016 and the distortion caused to the gross loss ratio in 2016 by the change in the Ogden discount rate from 2.5% to -0.75%, which resulted in the reserves for outstanding prior year injury claims being strengthened.

Figure 16 shows the movements in the net loss ratio between year-end 2016 and year-end 2017 for the top 30 (by GWP) insurers. We note that figures relating to both Aviva Insurance and Aviva International Insurance have been excluded from Figure 16 as intra-group reinsurance arrangements between the two companies, effected in 2016, have distorted their loss ratios.

FIGURE 16: CHANGE IN NET LOSS RATIOS BY YEAR, GWP TOP 30



As shown in Figure 16, the movements in the net loss ratio between 2016 and 2017 were not significant for over half of the insurers comprising the top 30 (i.e., those close to the diagonal), although a few insurers experienced significantly favourable or adverse movements in their net loss ratios. Insurers that suffered a deterioration in their net loss ratios are mainly those that wrote property insurance in the US (which were therefore exposed to losses from some or all of hurricanes Harvey, Irma and Maria and California wildfires) and those writing motor treaty covers (which suffered from the impact of the change in the Ogden discount rate in February 2017).

On the other hand, those insurers exhibiting significant improvements in their net loss ratios are those writing direct motor insurance, which had materially strengthened their reserves for prior years as at year-end 2016 results in response to the change in the Ogden discount rate (the impact of which was much reduced in the 2017 results as by then it mainly affected the 2017 accident year).

In Figure 17, we show the operating margin for each line of business (sorted by GWP volumes, as per Figure 13) on an aggregated basis for the insurers included in our panel. We defined (and derived) the operating margin as (net earned premium – net incurred – expenses incurred) / (gross earned premium). We note that the operating margin as defined includes movements in prior year reserves (part of the net incurred) but does not include investment income.

FIGURE 17: OPERATING MARGINS IN 2017 BY LINE OF BUSINESS

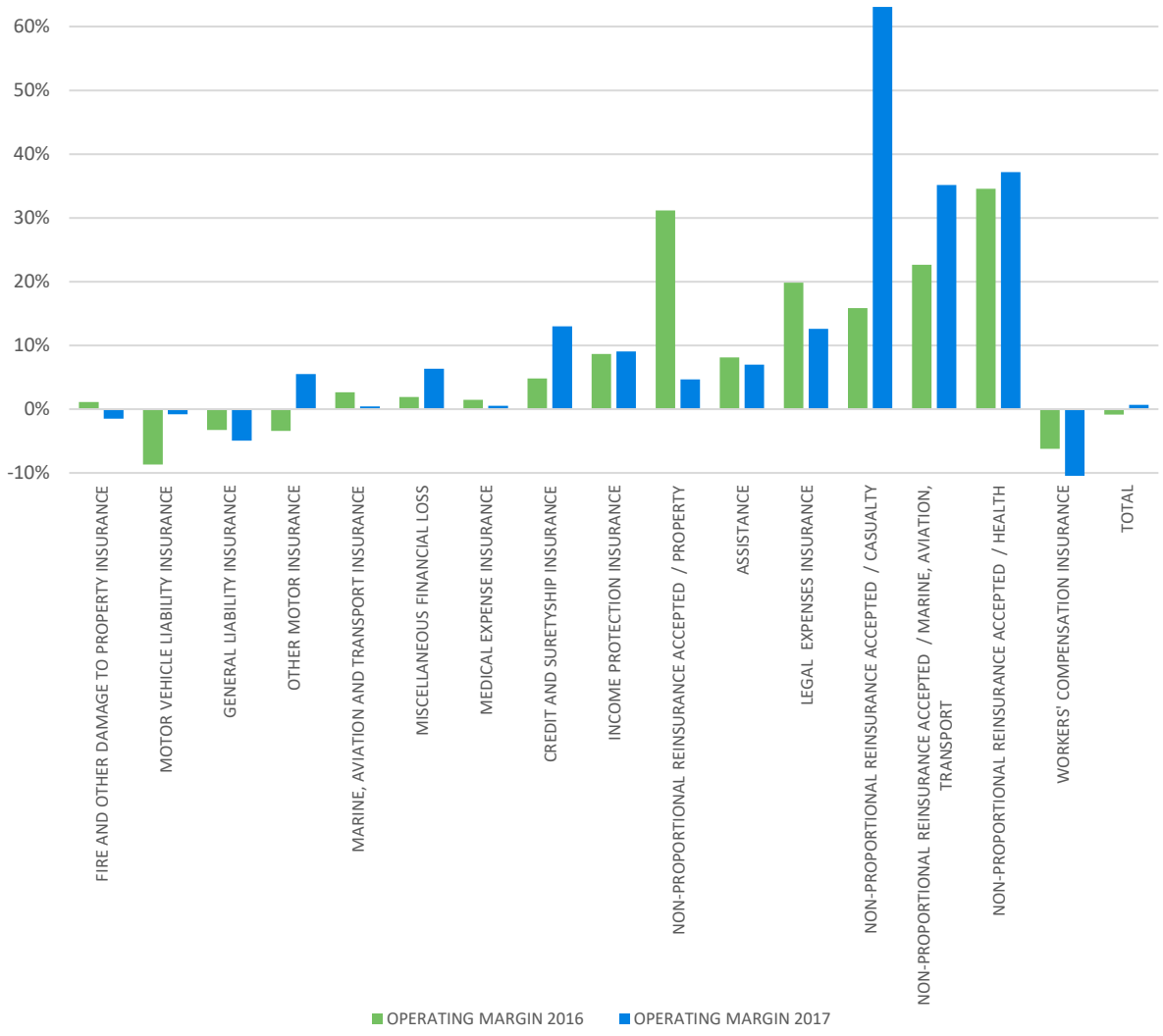
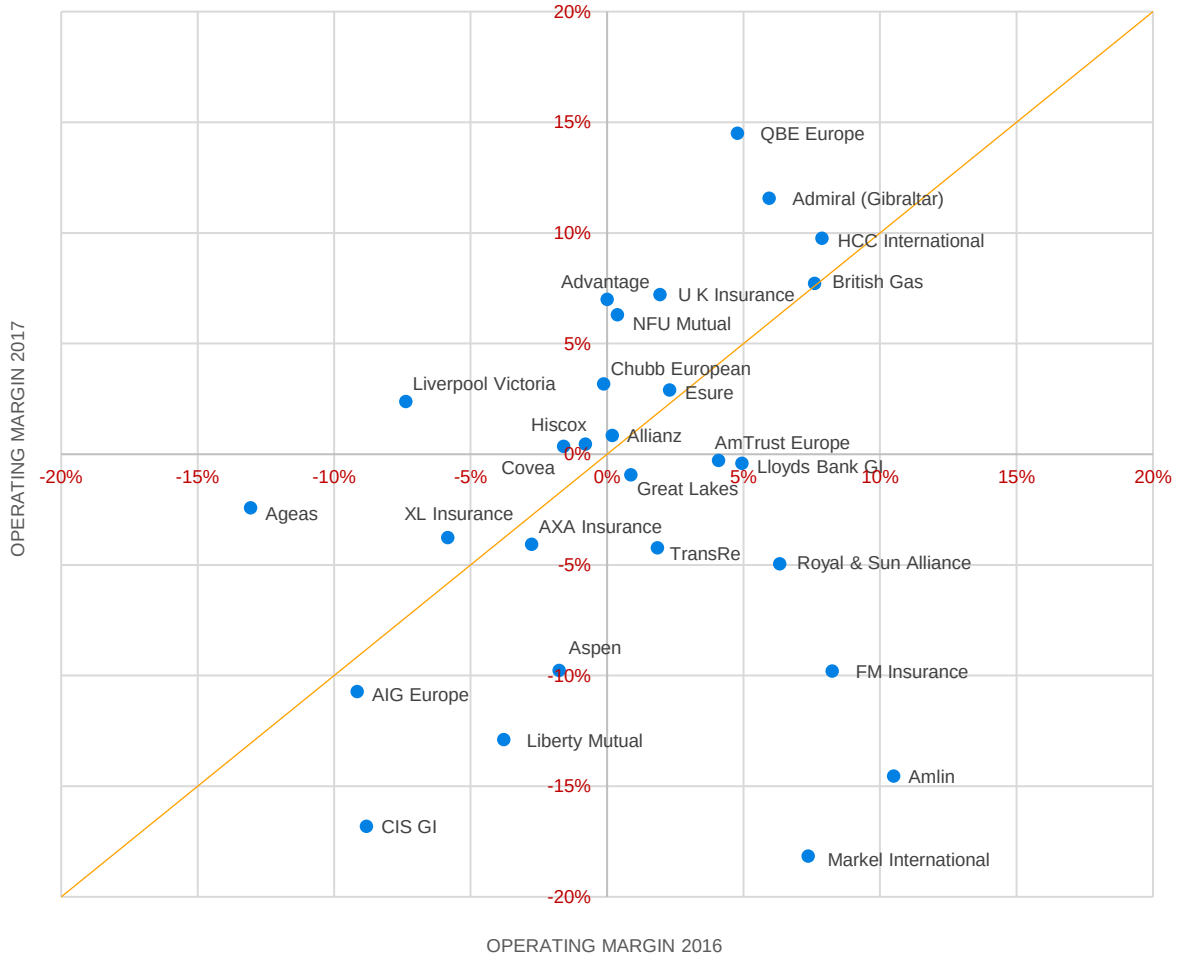


Figure 17 indicates that the property, motor liability, general liability and workers' compensation lines of business experienced negative operating margins in 2017, due in part to the market in those lines being highly competitive (we note that the operating margin for workers' compensation is -92% for year-end 2017). Some of these loss-making lines of business—property and motor and general liability—are the largest components of the UK market, in terms of both GWP and technical provisions. Overall, the operating margin in 2017 reported in the SFCRs was 0.7%. That compares with -0.9% in 2016.

Figure 18 shows the change in operating margin between 2016 and 2017 for the top 30 (by GWP) insurers, excluding again the two Aviva entities. As opposed to Figure 17, the operating margin in Figure 18 includes 'Other expenses' which are not attributed to administrative, investment management, claims management, acquisition or overhead expenses as they are not allocated by line of business.

FIGURE 18: CHANGE IN OPERATING MARGIN BY YEAR, GWP TOP 30



Movements in operating margin between 2016 and 2017, as exhibited in Figure 18, are broadly consistent with the movements in the loss ratios indicated in Figure 16 above. This implies that changes in loss ratios are the main drivers of changes in insurers' operating margin movements. However, we note that some insurers, such as Royal & Sun Alliance, have seen a deterioration in their operating margins resulting from significant increases in their expenses. The impact of unfavourable claims experience for some other insurers (e.g., Aspen) has been dampened by lower expenses.

Appendix A:
List of entities whose data was included within the analysis

FULL NAME	SHORT NAME USED IN THE REPORT
AA UNDERWRITING INSURANCE COMPANY LIMITED	
ADMIRAL INSURANCE (GIBRALTAR) LIMITED	ADMIRAL (GIBRALTAR)
ADMIRAL INSURANCE COMPANY LIMITED	
ADVANTAGE INSURANCE COMPANY LIMITED	ADVANTAGE
AGEAS INSURANCE LIMITED	AGEAS
AGF INSURANCE LIMITED	
AIG EUROPE LIMITED	AIG EUROPE
AIOI NISSAY DOWA INSURANCE COMPANY OF EUROPE PLC	
ALLIANZ INSURANCE PLC	ALLIANZ
ALWYN INSURANCE COMPANY LIMITED	
AMBAC ASSURANCE UK LIMITED	
AMLIN INSURANCE S.E.	AMLIN
AMT MORTGAGE INSURANCE LIMITED	
AMTRUST EUROPE LIMITED	AMTRUST EUROPE
ARCH INSURANCE COMPANY (EUROPE) LIMITED	
ASHDOWNS LIMITED	
ASPEN INSURANCE UK LIMITED	ASPEN
ASSURANT GENERAL INSURANCE LIMITED	
ASSURED GUARANTY (EUROPE) PLC	
ASSURED GUARANTY (LONDON) PLC	
ASSURED GUARANTY (UK) PLC	
AVIVA INSURANCE LIMITED	AVIVA INSURANCE
AVIVA INTERNATIONAL INSURANCE LIMITED	AVIVA INTERNATIONAL
AVON INSURANCE PLC	
AXA INSURANCE UK PLC	AXA INSURANCE
BAR MUTUAL INDEMNITY FUND LIMITED	
BERKSHIRE HATHAWAY INTERNATIONAL INSURANCE LIMITED	
BESTPARK INTERNATIONAL LIMITED	
BRITISH GAS INSURANCE LIMITED	
BRITISH RESERVE INSURANCE COMPANY LTD	
CALPE INSURANCE COMPANY LIMITED	
CASUALTY & GENERAL INSURANCE COMPANY (EUROPE) LIMITED	
CATALINA LONDON LIMITED	
CATALINA WORTHING INSURANCE LIMITED	
CHINA TAIPING INSURANCE (UK) CO LTD	
CHUBB EUROPEAN GROUP LIMITED	
CHURCHILL INSURANCE COMPANY LIMITED	
CIS GENERAL INSURANCE LIMITED	CIS GI
CNA INSURANCE COMPANY LIMITED	
COLLINGWOOD INSURANCE COMPANY LIMITED	
CORNISH MUTUAL ASSURANCE COMPANY LIMITED	
COVEA INSURANCE PLC	COVEA

FULL NAME	SHORT NAME USED IN THE REPORT
CX REINSURANCE COMPANY LIMITED	
DAS LEGAL EXPENSES INSURANCE COMPANY LIMITED	
DOMESTIC & GENERAL INSURANCE PLC	
EAST WEST INSURANCE COMPANY LIMITED	
EC INSURANCE COMPANY LIMITED	
ECCLESIASTICAL INSURANCE OFFICE PLC	
EIFLOW INSURANCE LIMITED	
ENDURANCE WORLDWIDE INSURANCE LIMITED	
EQUITAS INSURANCE LIMITED	
ESURE INSURANCE LIMITED	ESURE
EUROGUARD INSURANCE COMPANY PCC LIMITED	
EVOLUTION INSURANCE COMPANY LIMITED	
FGIC UK LTD	
FIDELIS UNDERWRITING LIMITED	
FINANCIAL & LEGAL INSURANCE COMPANY LTD	
FINANCIAL INSURANCE COMPANY LIMITED	
FIRST TITLE INSURANCE PLC	
FLOOD RE LIMITED	
FM INSURANCE COMPANY LIMITED	FM INSURANCE
FOLGATE INSURANCE COMPANY LTD	
GENCON INSURANCE COMPANY INTERNATIONAL LIMITED	
GREAT LAKES INSURANCE SE	GREAT LAKES
GRESHAM INSURANCE COMPANY LIMITED	
GUARANTEE PROTECTION INSURANCE LIMITED	
HAVEN INSURANCE COMPANY LIMITED	
HCC INTERNATIONAL INSURANCE COMPANY PLC	HCC INTERNATIONAL
HIGHWAY INSURANCE COMPANY LIMITED	
HISCOX INSURANCE COMPANY LIMITED	HISCOX
HOMECARE INSURANCE LTD	
HOUSTON CASUALTY COMPANY (LONDON BRANCH)	
HSB ENGINEERING INSURANCE LIMITED	
INCEPTUM INSURANCE COMPANY LIMITED	
INTERNATIONAL GENERAL INSURANCE COMPANY (UK) LIMITED	
LANCASHIRE INSURANCE COMPANY (UK) LIMITED	
LEGAL & GENERAL INSURANCE LTD	
LIBERTY MUTUAL INSURANCE EUROPE LIMITED	LIBERTY MUTUAL
LIGHTHOUSE GENERAL INSURANCE COMPANY LIMITED	
LIVERPOOL VICTORIA INSURANCE COMPANY LIMITED	LIVERPOOL VICTORIA
LLOYDS BANK GENERAL INSURANCE LIMITED	LLOYDS BANK GI
LONDON GENERAL INSURANCE COMPANY LIMITED	
LV PROTECTION LIMITED	
MARKEL INTERNATIONAL INSURANCE COMPANY LIMITED	MARKEL INTERNATIONAL
METHODIST INSURANCE PLC	
MILLENNIUM INSURANCE COMPANY LIMITED	
MITSUI SUMITOMO INSURANCE COMPANY (EUROPE) LIMITED	

FULL NAME	SHORT NAME USED IN THE REPORT
MOTORS INSURANCE COMPANY LIMITED	
MULSANNE INSURANCE COMPANY LIMITED	
MUNICIPAL MUTUAL INSURANCE LIMITED	
NELSON INSURANCE COMPANY LIMITED	
NEWLINE INSURANCE COMPANY LIMITED	
ONE RE LTD	
PAMIA LIMITED	
PINNACLE INSURANCE PLC	
PORTMAN INSURANCE SE	
PREMIER INSURANCE COMPANY LIMITED	
PREMIUM INSURANCE COMPANY LIMITED	
QBE INSURANCE (EUROPE) LIMITED	QBE EUROPE
QBE RE (EUROPE) LIMITED	
R&Q GAMMA COMPANY LIMITED	
RAC INSURANCE LIMITED	
RED SANDS INSURANCE COMPANY (EUROPE) LIMITED	
RIVERSTONE INSURANCE (UK) LIMITED	
RIVERSTONE INSURANCE LIMITED	
ROYAL & SUN ALLIANCE INSURANCE PLC	ROYAL & SUN ALLIANCE
ROYAL & SUN ALLIANCE REINSURANCE LIMITED	
SABRE INSURANCE COMPANY LIMITED	
SAMSUNG FIRE & MARINE INSURANCE COMPANY OF EUROPE LIMITED	
SCOR UK COMPANY LTD	
SKYFIRE INSURANCE COMPANY LIMITED	
SOMPO JAPAN NIPPONKOA INSURANCE COMPANY OF EUROPE LIMITED	
ST JULIANS INSURANCE COMPANY LIMITED	
ST. ANDREW'S INSURANCE PLC	
STARR INTERNATIONAL (EUROPE) LIMITED	
STARSTONE INSURANCE SE	
STEAMSHIP MUTUAL UNDERWRITING ASSOCIATION LIMITED	
STEWART TITLE LIMITED	
STONEBRIDGE INTERNATIONAL INSURANCE	
SUNDERLAND MARINE INSURANCE COMPANY LIMITED	
SWISS RE SPECIALTY INSURANCE (UK) LIMITED	
TEACHERS ASSURANCE COMPANY LIMITED	
TESCO UNDERWRITING LIMITED	
THE BAPTIST INSURANCE COMPANY PLC	
THE BRITANNIA STEAM SHIP INSURANCE ASSOCIATION LIMITED	
THE EQUINE AND LIVESTOCK INSURANCE COMPANY LIMITED	
THE GRIFFIN INSURANCE ASSOCIATION LIMITED	
THE MARINE INSURANCE COMPANY LIMITED	
THE NATIONAL FARMERS UNION MUTUAL INSURANCE SOCIETY LIMITED	NFU MUTUAL
THE OCEAN MARINE INSURANCE COMPANY LIMITED	
THE PALATINE INSURANCE COMPANY LIMITED	
THE SALVATION ARMY GENERAL INSURANCE CORPORATION LTD	
THE STANDARD CLUB EUROPE LTD	

FULL NAME	SHORT NAME USED IN THE REPORT
THE VETERINARY DEFENCE SOCIETY LIMITED	
THE WREN INSURANCE ASSOCIATION LTD	
TOKIO MARINE KILN INSURANCE LIMITED	
TOKIO MILLENNIUM RE (UK) LIMITED	
TRADEWISE INSURANCE COMPANY LIMITED	
TRADEX INSURANCE COMPANY LIMITED	
TRAFALGAR INSURANCE PLC	
TRANSRE LONDON LIMITED	TRANSRE
TRAVELERS INSURANCE COMPANY LIMITED	
TT CLUB MUTUAL INSURANCE LIMITED	
U K INSURANCE LIMITED	U K INSURANCE
UIA (INSURANCE) LIMITED	
UNITED KINGDOM FREIGHT DEMURRAGE AND DEFENCE ASSOCIATION LIMITED	
UNITED KINGDOM MUTUAL WAR RISKS ASSOCIATION LTD	
WATFORD INSURANCE COMPANY EUROPE LIMITED	
XL CATLIN INSURANCE COMPANY (UK) LTD	
XL INSURANCE COMPANY SE	XL INSURANCE
ZENITH INSURANCE PLC	

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