SOLVENCY
AND FINANCIAL
CONDITION REPORT (SFCR)
2018

Fortegra Europe Holdings Limited

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INTRODUCTION

This report is the Solvency and Financial Condition Report (SFCR) of Fortegra Europe Holdings Limited, for the reporting period ended December 31, 2018, pursuant to Articles 51, 53, 54, 256 and 256a of the Solvency II Directive 2009/138/EC, as amended and Articles 290 to 298 and 359 to 364 of Delegated Regulation (EU) 2015/35, as amended. The report has been prepared in accordance with the Solvency II Regulations governing insurance company reporting, and is solely intended to fulfil the requirements thereof.

Pursuant to Article 51 of the Directive, certain information provided in this report is incorporated by reference to the Annual Report. There are, however, certain specific SFCR requirements which are not already reported publicly elsewhere, and those are specifically included in this report. In particular, this report includes reporting of the Solvency II valuation undertaken at December 31, 2018. Those results are also presented in the Quantitative Reporting Templates (QRTs).

Presentation of information

This report relates to Fortegra Europe Holdings Limited and its subsidiary insurance company, Fortegra Europe Insurance Company, which constitute an insurance group at the level of Fortegra Europe Holdings Limited (collectively "the Group") in terms of Articles 218 to 258 of the Solvency II Directive 2009/138/EC. Fortegra Europe Holdings Limited is a pure holding company with no other trading activity.

The Group's financial statements and related notes are prepared in accordance with International Financial Reporting Standards (IFRS) and published in United States Dollar ("USD"). Unless otherwise stated, all amounts in this report are expressed in USD. Amounts may have been rounded. Rounding differences may exist, including for percentages.

The Group's solvency calculation is prepared using the Accounting consolidation-based method in line with Article 230 of the Solvency II Directive 2009/138/EC.

Cautionary statement regarding forward looking statements

This report may include statements with respect to future events, trends, plans, expectations or objectives and other forward-looking statements relating to the Group's future business, financial condition, results of operations, performance, and strategy. Forward-looking statements are not statements of historical fact and may contain the terms "may", "will", "should", "continue", "aims", "estimates", "projects", or words of similar meaning. Such statements are based on Management's current views and assumptions and, by nature, involve known and unknown risks and uncertainties' therefore undue reliance should not be placed on them. Actual financial condition, results of operations, performance or events may differ materially from those expressed or implied in such forward-looking statements, due to a number of factors, including, but not limited to, general economic and political conditions and competitive situation, future financial market performance and conditions, including fluctuations in exchange and interest rates; frequency and severity of insured loss events, and increases in loss expenses;, changes in laws, regulations and standards; the impact of acquisitions and disposals, including related integration issues, and reorganisation measures; and general competitive factors, in each case on a local and/ or global basis. Many of these factors may be more likely to occur, or more pronounced, as result of catastrophic events, or terrorist-related incidents.

EXECUTIVE SUMMARY

Pursuant to the Solvency II Regulations, the following is a summary overview of each of the sections required in the report. Please refer to each of those sections in their entirety, including in each case the materials incorporated by reference therein.

A. Business and performance (Section A)

The Group was formed at the beginning of 2018 and is a wholly-owned subsidiary of LOTS Intermediate Co., with Fortegra Financial Corporation serving as the ultimate parent.

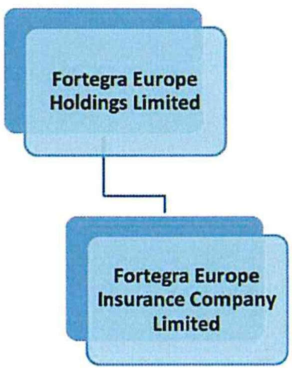
The strategy of the Group is to support its sole subsidiary, Fortegra Europe Insurance Company Limited (the "Insurance Company") in its primary activities being underwriting of non-life insurance. The Insurance Company was authorised on 29 March 2018 and accepts risks on the following Solvency II lines of business:

- Motor vehicle liability insurance;
- Fire and other damage to property insurance;
- Miscellaneous financial loss.

The Insurance Company transacted the first insurance business in November 2018. It closed the period with written premiums amounting to USD1.6 million. There were no claims during 2018. The net losses for the period amounting to USD285K for the Insurance Company and USD308K for the Group.

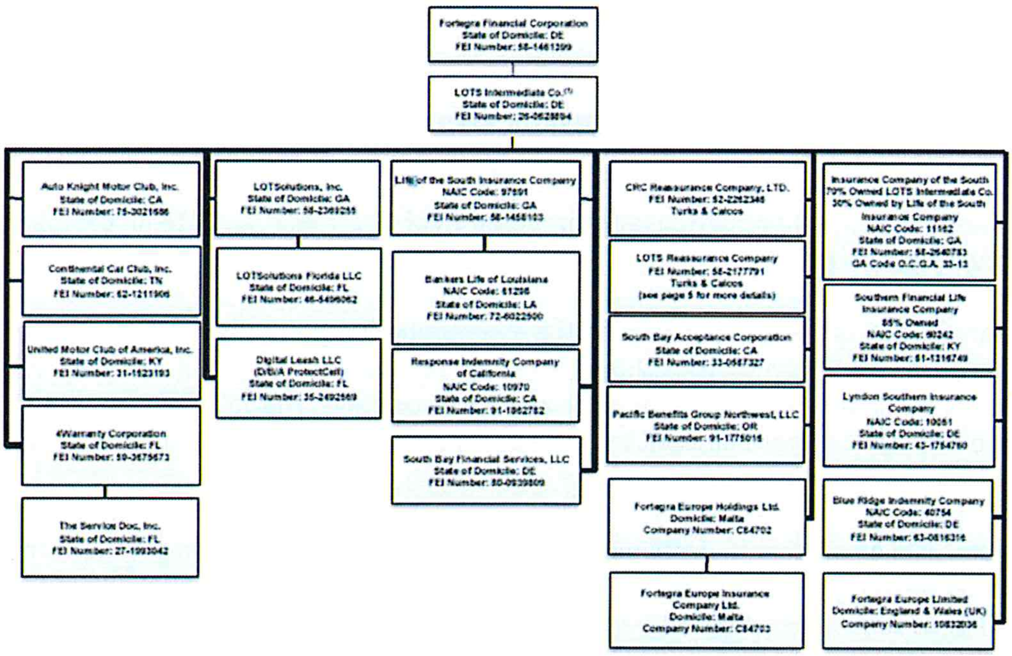
B. System of governance (Section B)

The Group's structure is shown in the figure below:



The structure of Fortegra Financial Corporation is shown in the figure below:

Fortegra Financial Corporation



In order to manage the risks to which the Group is exposed, the Group has put in place a comprehensive system of internal controls and risk management governance designed to ensure that executives are informed of significant risks on a timely and continuing basis and have the necessary information and tools to appropriately analyse and manage these risks. Such controls include an internal framework with three risk-related lines of defence; the use of the four key functions (Risk Management; Compliance; Internal Audit; and Actuarial) as required by the Solvency II Regulations; and a system of internal risk management governance designed to ensure that the risks to which the Group is exposed are identified, assessed, monitored and controlled in a timely manner.

C. Risk profile (Section C)

Having no other trading activity other than the investment within the Insurance Company, the Group is exposed to the same risks of the Insurance Company. The Group is exposed to underwriting risks, market risks, credit risks, liquidity risks, operational risks and other material risks. These risks relate to the Insurance Company and reflect the fact that the Insurance Company is a start-up and is underwriting business across Europe. The nature of such risks and their impact on the Group's risk profile under various scenarios are in each case set forth in Section C hereof, including by reference to the documents incorporated therein.

As part of the Group's regulated Own Risk and Solvency Assessment (ORSA), the Group also considered a number of stress tests and scenarios to assess its resilience and strength of its business model when facing adverse events during the projected period. The results from these analyses indicate that the Group will continue to have eligible own funds to comply with the Solvency Capital Requirements (SCR) even in stressed scenarios.

D. Valuation for solvency purposes (Section D)

The Group's Solvency II balance sheet is prepared as of December 31, 2018, in compliance with Solvency II Regulations.

Assets and liabilities are valued based on the assumption that the Group will pursue its business as a going concern. Technical provisions are recognised with respect to all insurance obligations towards policyholders and beneficiaries of insurance contracts. The value of technical provisions corresponds to the current amount that the Group would have to pay if it were to transfer its insurance obligations to another insurance undertaking.

Assets and liabilities, other than technical provisions, are recognised in compliance with IFRS and interpretations of the IFRS Interpretations Committee that are endorsed by the European Union before the balance sheet date with a compulsory date of January 1, 2018, provided that those standards and interpretations include valuation methods that are in accordance with the following market consistent valuation approach set out in Article 75 of the Solvency II Directive:

- Assets shall be valued at the amount for which they could be exchanged between knowledgeable willing parties in an arm's length transaction;
- Liabilities shall be valued at the amount for which they could be transferred, or settled, between knowledgeable willing parties in an arm's length transaction.

E. Capital management (Section E)

The Group has the appropriate structure and processes necessary to manage and oversee its own funds, and has a policy and medium-term capital management plan to maintain solvency levels within the limits established by the legislation and by the Group's own risk appetite.

The following table shows details of the Group's solvency ratio:

	31 December 2018
Solvency Capital Requirement (SCR)	USD2,370,116
Eligible own funds to meet the SCR	USD7,171,257
Solvency ratio (SCR coverage)	301.48%

The Group's Solvency Capital Requirement amounted to USD2.4 million. The SCR corresponds to the own funds that the Group must hold to limit the probability of bankruptcy to one case per 200, or that the Group is still 99.5% able to meet its commitments to insurance beneficiaries or policyholders during the following year.

To calculate the solvency ratio, the Group does not make use of matching and volatility adjustments, or transitional measures for technical provisions.

The Solvency II regulation also establishes a Minimum Capital Requirement (MCR), which is the minimum level of security under which financial resources should never fall. The Group's MCR amounted to USD2.9 million. The ratio of eligible own funds to MCR is equal to 245.10%.

A. BUSINESS AND PERFORMANCE

A. BUSINESS AND PERFORMANCE

A.1 Business

Fortegra Europe Holdings Limited is a limited liability company incorporated in Malta with registration number of C 84702. It is a pure holding company with no other trading activity and its strategy is to support its subsidiary, Fortegra Europe Insurance Company Limited (the "Insurance Company") in its primary activities being underwriting of non-life insurance. Fortegra Europe Holdings Limited is defined as being an "insurance holding company" in Article 212 (f) of the Solvency II Directive.

The Insurance Company operates as a non-life insurance company authorised by the Malta Financial Services Authority ("MFSA") with the head office situated in Malta. The Group is a wholly-owned subsidiary of LOTS Intermediate Co., with Fortegra Financial Corporation serving as the ultimate parent. Fortegra, an insurance holding company, was incorporated in the State of Georgia in 1981 under the name Life of the South Corporation. In 2009, Fortegra changed its name to Fortegra Financial Corporation and subsequently reincorporated in the State of Delaware in November 2010. Its principal executive offices are located at 10151 Deerwood Park Boulevard, Building 100, Suite 330, Jacksonville, Florida, 32256.

The Insurance Company is authorised under the Insurance Business Act (Cap. 403) to write insurance under business Classes 3 (Land vehicles), 8 (Fire and natural forces), 9 (Other damages to property) and 16 (Miscellaneous financial loss), transacting business and providing its services in the following territories:

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Iceland
- Ireland
- Italy
- Latvia
- Liechtenstein
- Lithuania
- Luxembourg
- Netherlands
- Norway
- Poland
- Portugal
- Romania
- Slovakia
- Slovenia
- Spain
- Sweden
- United Kingdom

The Insurance Company does not underwrite any risks situated in Malta. The business written during 2018 is in the United Kingdom only, however, the Insurance Company expects to write business in Spain and other EU countries during 2019.

The below are details of the Group:

REGISTERED ADDRESS

The Reed Centre,
Blue Harbour,
Ta' Xbiex Marina, Ta' Xbiex, XBX 1027

SUPERVISORY AUTHORITY

The Group's principal supervisor is the Malta Financial Services Authority (MFSA).

Malta Financial Services Authority (MFSA),
Insurance and Pension Supervision Unit,
Notabile Road, Attard, BKR 3000
Phone: + 356 2144 1155
Website: www.mfsa.com.mt

STATUTORY AUDITORS

Deloitte Audit Limited,
Deloitte Place,
Mriehel Bypass, Mriehel, BKR 3000
Phone: + 356 2134 5000

SHAREHOLDERS

The table below reflects the company, which hold qualified investments in the Group:

Name	Legal Status	Location	% of ownership
LOTS Intermediate Co.	Limited Liability	Delaware, United States	100%

The registered address of the shareholder is:

LOTS Intermediate Co. (Reg no: 4365570)
National Corporate Research Ltd,
850 New Burton Road, Suite 201, Dover,
Kent County, Delaware 19904,
United States

A.2 Underwriting performance

Given that the Group is during its initial stages of underwriting activity, the Insurance Company wrote only Guaranteed Asset Protection (GAP) Policies as at 31 December, 2018. These motor vehicle asset protection products provide policyholders with a financial benefit over and above the amount a motor insurer will pay out in the event the vehicle is declared a total loss, for example, as a result of accidental or malicious damage, fire, theft or flood. The main types of GAP policies purchased are as follows:

Contract Hire/ Lease GAP
Where a policyholder has leased or hired a motor vehicle for a fixed period, the policy will pay the difference between the contract hire/ lease settlement figure and the motor insurers' settlement.

Finance GAP
Where the motor vehicle has been purchased under a finance agreement, the policy will pay the amount by which the finance agreement settlement figure exceeds the motor insurers' settlement.

Combined Return to Invoice and Finance GAP
Will pay the greater of a) the amount by which the purchase price of the motor vehicle exceeds the comprehensive motor insurers' settlement or b) the Finance GAP benefit as explained above.

Combined Vehicle Replacement and Finance GAP
Will pay the greater of a) the amount by which the cost of a replacement vehicle (equivalent to the original motor vehicle specification) exceeds the comprehensive motor insurers' settlement or b) the Finance GAP benefit as explained above.

Below is the quantitative information regarding the activity and underlying results for 2018 by line of business.

Non-life insurance	Miscellaneous financial loss 2018 (USD)
Gross premiums written	1 ,593,169
Reinsurers' share	-
Net premiums written	**1,593,169**
Change in the gross provision for unearned premium	(1,548,139)
Earned premiums, net of reinsurance	**45,030**
Operating expenses	
Acquisition costs	(1,226,963)
Change in deferred acquisition costs, net of reinsurance	1,194,367
Earned premiums, net of reinsurance and acquisition costs	**12,434**
Change in the provision for claims	(6,853)
Claims incurred, net of reinsurance	**(6,853)**
Net underwriting income	**5,581**

As can been seen from the aforementioned tables, the Insurance Company closed the period with gross annual premium for these policies amounts to USD1.6 million.

A.3 Investment performance

The only investment of Fortegra Europe Holdings Limited is within the Insurance Company. The latter has an Investment Management Policy in place. In line with the Investment Management Policy, the Insurance Company only invests in assets whose risks can be properly identified, measured, monitored, controlled and reported. Moreover, such assets shall meet the specific risk profile, approved risk tolerance limits and the business strategy of the Insurance Company. It is the Insurance Company's policy that the funds are invested in a range of instruments and credit institutions in order to provide for their safety, liquidity and return.

As at 31 December 2018, the majority of the Group's liquid assets are held in cash or cash equivalent assets. However, as the Group's cash resources grow the Board of Directors of the Group will consider investing any surplus resources. Currently, the Group is using two banks to diversity its funds, which are deposited with Fifth Third Bank and Barclays Bank.

Interest income	2018 (USD)
Interest on cash	97,015
Total financial income	**97,015**

A.4 Performance of other activities

The Group's income is solely generated from the underwriting performance of the policies and the investment performance of the Insurance Company. Likewise, the expenses are solely generated from the technical and operational costs of the Insurance Company. The Group had no other material income and expenses from other activities in the reporting period.

A.5 Any other information

There is no additional information that has not been included in the preceding sections.

B. SYSTEM OF GOVERNANCE

B. SYSTEM OF GOVERNANCE

B.1 General information on the system of governance

The Board of Directors of the Insurance Company, which is the entity responsible for fulfilling the governance requirements at the level of the Group, is the focal point of the Group's corporate governance regime and is ultimately responsible for all decisions made regarding its governance. In the setting up and design of the structure of the organisation, the Board of the Insurance Company ensures that there are adequate and suitably qualified human resources to safeguard the proper operation of the Group. In addition to this, the Board of the Insurance Company ensures at all times that there are well defined communication and reporting procedures in place to ensure that any relevant and critical information is immediately shared amongst the appropriate persons throughout the organisation and that these have access at all times to any information that they need in order to discharge their duties effectively, efficiently and in a timely manner. The flow of information will flow across the organisational hierarchy top down and vice versa, and across any operational or functional units as required.

Moreover, the Board of the Insurance Company, together with the outsourced managed function drive and monitor the system of governance to ensure that the Group's established functions, controls and systems are effective and in line with the Group's policies and regulatory requirements. This is achieved through established polices, processes, key function holders, committee meetings and board meetings.

Board of Directors

The Group has common Board members. This is not considered to result in a conflict of interest given that the Group shares common goals and to date, only one entity has business activities. The Board of Directors of Fortegra Europe Holdings Limited is composed of Richard Kahlbaugh (Chairman), Michael Vrban and Michael Grasher. Richard Kahlbaugh is the President and CEO of Fortegra Financial Corporation, the ultimate parent. This ensure effective communication with the wider corporate group. The Board of Directors of the Insurance Company is composed of Richard Kahlbaugh (Chairman), Michael Vrban, Michael Grasher, Sanjay Vara, Kevin Vella and James Portelli.

The Board of the Insurance Company is responsible for setting out the general direction of the Group, the goal being of achieving sound and prudent management. Sound and prudent management entails an effective risk management function and the implementation of adequate internal control practices in a consistent manner throughout the organisational structure. The Board of the Insurance Company has established various policies to encompass all the Group's controls and processes.

To this effect the Board of the Insurance Company has the following written policies:

Business Continuity Policy	Capital Management Policy
Complaints and Handling Policy	Compliance Policy
Conduct Risk Policy	Corporate Governance Policy
Data Privacy Policy	Fit and Proper Policy
Internal Audit Policy	Investment Management Policy
Own Risk and Solvency (ORSA) Policy	Outsourcing Policy
Product Distribution Policy	Product Oversight and Governance Policy
Remuneration Policy	Reserving Policy
Risk Management Policy	Underwriting Policy

All policies are reviewed at least annually or when there are material changes to the business structure or changes in any process or processes, in order to ensure that they are up to date and that they reflect the controls intended to be put and kept in place by the Group. All policy reviews are documented and there will be an identified reviewer for each policy. Any reasons for change or otherwise is also documented. The Board of the Insurance Company ensures that all policies are communicated and understood throughout the organisation, and where necessary or applicable they are made known to any outsourced service providers. In addition to the above, other policies may be developed if required by its business profile or change any policy if required.

The Board of the Insurance Company meets at least four times every year or more frequently if required by the business of the Group, or if any circumstance material to the organisation arises at any point in time.

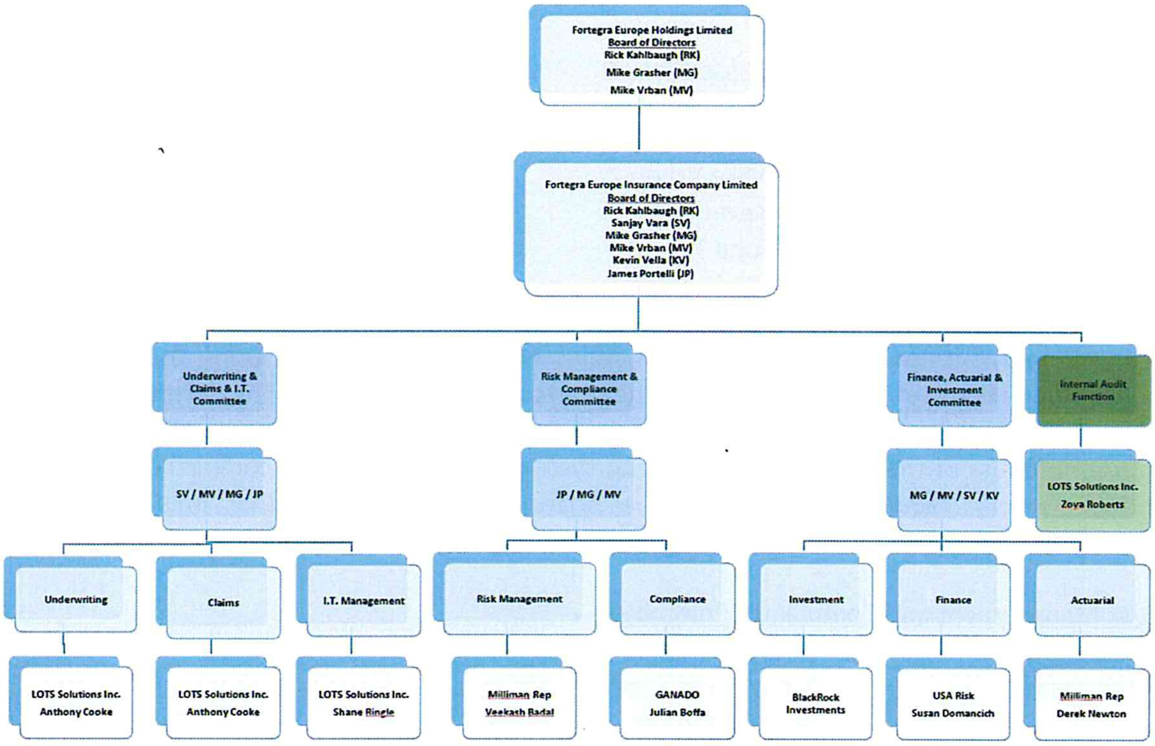
The Board of the Insurance Company possesses the required diversity of knowledge, skills and experience to perform their role effectively and fulfil the Solvency II criteria to collectively possess the appropriate qualification, experience and knowledge about at least:

a) Insurance and financial markets;
b) Business strategy and business model;
c) System of governance;
d) Financial and actuarial analysis;
e) Regulatory framework and requirements.

All Group Directors have been assessed to be fit and proper for the roles. Personal Questionnaires for each Director have been completed.

Group's governance structure

The Group's governance structure is shown in the figure below:



The Board Committees

The Board of the Insurance Company appointed various committees to assist it in its governance role. However, it still retains the ultimate responsibility for these delegated functions. Each committee has its own terms of reference and the reporting of each of the established committees is directly to the Board of the Insurance Company. The Board Committees are as follows:

<u>Underwriting and Claims and IT Committee</u>

Chairman:	Mr. Sanjay Vara
Members:	Mr. Mike Grasher
	Mr. Mike Vrban
	Mr. James Portelli

This Committee exists to establish and review, on a regular basis, the insurance needs of the Group's clients and the adequacy of the policies in place, via relationships or otherwise, to ensure the terms and conditions of the Group's Underwriting Agreements with Third Party Administrators (TPAs) or intermediaries in the host jurisdictions are complied with. The Committee is also responsible for ensuring that appropriate due diligence processes are conducted in relation to the quality, size and geographic scope of the claims handling services of the TPAs. Meetings of the Committee are held at least on a quarterly basis.

Finance, Actuarial and Investment Committee

Chairman:	Mr. Mike Grasher
Members:	Mr. Sanjay Vara
	Mr. Mike Vrban
	Mr. Kevin Vella
	Mr. John Tortell

This Committee is responsible for the oversight of the service providers performing the finance, actuarial and investment management functions of the Group and ensuring they meet the expected standards of service in terms of their outsourcing agreements. The Committee is also responsible for the monitoring of the integrity of the financial statements of the Group and the appropriateness of the Group's internal data, systems and controls and compliance with legal and regulatory requirements relating to financial reporting, actuarial and investment management functions. Meetings of the Committee are held at least on a quarterly basis.

Risk Management and Compliance Committee

Chairman:	Mr. James Portelli
Members:	Mr. Mike Grasher
	Mr. Mike Vrban
	Mr. John Tortell

This Committee is responsible for the oversight of the service providers performing the risk management and compliance functions of the Group and ensuring they meet the expected standards of service in terms of their outsourcing agreements. In performing its oversight role, the Committee shall ensure that it receives regular reports from the risk management and compliance functions of the Group at each Committee meeting. Meetings of the Committee are held at least on a quarterly basis.

Based on the nature, scale and complexity of the and in terms of Article 2(1) (f) of the Solvency II Directive 2003/71/ EC, the Group classifies as a small and medium-sized enterprise. The functions normally assigned to an audit committee are assumed by the Board of the Insurance Company. Mr. Mike Grasher, being the person on the Board Committee with the required accounting and auditing expertise is the Chairman of the Committee.

Key functions

The Board of the Insurance Company approved various policies to ensure operational independence of the key functions and direct access to the governing body. The Board and/ or relevant delegated committees receive reports from the responsible areas at the Group. The names of the parties responsible for the key functions were communicated to the MFSA.

The key functions have the resources that are necessary to perform the functions assigned to them under their respective policies.

The Group has identified the following key functions:

SALES AND DISTRIBUTION FUNCTION

The Group promotes its products primarily via insurance intermediaries who will introduce their business to Fortegra. The Group ensures that all appointed insurance intermediaries are duly licensed entities and will enter into a formal Terms of Business Agreement (TOBA) with such intermediaries on a temporary, annual basis. These intermediaries are independent from the Group and intermediate on behalf of various insurance undertakings. This function is the responsibility of Mr. Joe Avellino, with Mr. Sanjay Vara being the key function holder.

UNDERWRITING FUNCTION

Mr. Anthony Cook is the person responsible for the underwriting function of the Insurance Company. The key function holder is Mr. Sanjay Vara.

MANAGEMENT AND FINANCE FUNCTION

These functions were outsourced to USA Risk Group (Malta) Limited, an insurance manager authorised by the MFSA to carry out the activity of insurance management. It is the responsibility of the insurance manager to ensure that suitable resources are available within its staff complement to perform these key functions. The key function holder of the management function is Mr. Sanjay Vara, while the key functional holder of the finance function is Mr. Mike Grasher.

COMPLIANCE FUNCTION

This function was outsourced to Ganado Advocates, with the Compliance Officer being Mr. Julian Boffa. The Group's intention is to continue to passport its services to various territories within Europe and in order to ensure full compliance with the general good provisions of the host jurisdiction, the Group engages the services of suitably qualified companies or individuals to provide such local advice pertinent to each territory, who in turn will support the compliance function in Malta. The Compliance Officer will continue to ensure that when the Group obtains such services, it does so with fit and proper service providers and will oversee the approval of such compliance matters. The key function holder of this function is Mr. James Portelli.

RISK MANAGEMNT AND ACTURIAL FUNCTION

These functions were outsourced to Milliman LLP. The Group has taken this path to ensure that both functions, which are very much aligned in Solvency II disciplines are managed by a company which is well known, professional and experts in this field. These outsourced functions are oversighted by the respective committees. The key function holder of the risk management function is Mr. James Portelli, while the key function holder of the actuarial function is Mr. Mike Grasher.

CLAIMS HANDLING FUNCTION

The Group utilises the expertise of outsourced TPAs to handle claims management functions. All TPAs are vetted under strict guidelines and formally appointed by the Group. TPAs operate under strict delegated authority in line with the terms of formal Claims Management Agreements. TPAs will manage claim files in line with the Group's instructions and have defined limits for the payment of specific indemnities. Any claims or losses exceeding these agreed limits will be referred to the Insurance Manager for approval prior to authorisation and payment of the claim. The key functional holder is Mr. Sanjay Vara.

INTERNAL AUDIT FUNCTION

This function is outsourced intra-group to the Group's internal audit. The Internal Audit Manager conducts on-site audits annually, maintains an independent outlook on matters and adheres to the Internal Audit Policy. Moreover, an Internal Audit Plan was presented to the Board of the Insurance Company for approval during the year. Periodic review of compliance with relevant rules, regulations and regulatory requirements at an operational level. Internal auditors also perform test of information system general controls for systems used in claims processing, as well as tests of inventory integrity and internal controls over financial reporting. The key function holder is Mr. Rick Kahlbaugh.

INVESTMENT MANAGEMENT FUNCTION

This function is outsourced to BlackRock Investment Management (UK) Limited. The investment management function will perform investment in securities in accordance with the approved Board's written guidelines and restrictions. The key function holder is Mr. Mike Grasher.

IT MANAGEMENT FUNCTION

Mr Shane Ringle of LOTS Intermediate Co is responsible for IT management and he establishes and directs the strategic and tactical goals, policies, and procedures for the information technology department at Fortegra Group. He provides oversight and direction to the software development, network operations and IT security teams. The key function holder is Mr. Sanjay Vara.

The forums and their responsibilities are as set out below:

Management Body	Risk Management Roles and Responsibilities
Board of Directors	- Set and agree Group's strategic direction - Maintain the Risk Management Framework, including any major or significant changes - Agree risk strategy - Agree risk appetite - Review and approve risk register - Oversee information systems and data appropriateness - Ensure adequate and appropriate communication between Directors and with all other parties - Ensure that members of the Board, Committees and other parties, including those performing significant outsourced functions, possess the relevant knowledge and experience and fully understand what is required of them - Oversee the calculation of the SCR and continuous compliance therewith - Ensure any conflicts are appropriately managed and do not hinder the proper performance of any individual's duties - Oversee and challenge the ORSA and ensure that this forms an integral part of the decision-making process - Approve the ORSA - Ensure that all sub-committees and other functions perform their required duties adequately and promptly and, where required, report to the Board in a timely and appropriate manner - Set and agree an appropriate remuneration policy - Oversee processes and procedures to enable relevant reporting information to be obtained - Oversee QRT reporting disclosures - Oversee and approve the annual Solvency and Financial Condition Report - Oversee and approve the annual Regular Supervisory Report

Risk Management and Compliance Committee	- Propose and oversee Risk Management Framework, including any major or significant changes - Propose and oversee risk strategy - Propose and oversee risk appetite - Determine risk register and keep up-to-date - Oversee fair outcomes for consumers - Ensure that information systems are adequate and appropriate to the Group's requirements, that the data produced is appropriate for the intended use and that the systems enable the identification and management of all risks - Oversee the calculation of the SCR and continuous compliance therewith - Assist in the ORSA process and ensure that this forms an integral part of the decision-making process - Ensure that appropriate processes and procedures are in place to enable relevant reporting information to be obtained - Recommend and approve QRT reporting disclosures - Oversee and recommend the annual Solvency and Financial Condition Report - Oversee and recommend the annual Regular Supervisory Report - Ensure the internal audit requirements are met in an appropriate and proportional manner - Liaise with internal audit - Report to the Board the results of internal audits - Ensure any weaknesses/ issues arising from the internal audit are appropriately dealt with - Liaise with in-house/ outsourced actuarial function providers - Report to the Board on the actuarial function - Ensure all required Pillar III disclosures are met
Underwriting and Claims and IT Committee	- Assist Board in setting insurance risk strategy and appetite - Ensure insurance risk strategy adhered to - Propose to the Board insurance risk appetite limits and tolerances - Monitor insurance risk against limits and ensure this is appropriately reported to the Board - Provide appropriate input into the calculation of the SCR and technical provisions - Provide appropriate input into the ORSA process - Provide any required input into the QRT reporting and the SFCR

Although responsibility for various areas has been delegated, the Board of the Insurance Company retains overall responsibility for risk management and for ensuring at all times that the Group is managed in a risk-focused manner.

Relevant resolutions adapted by shareholders and the Board

During 2018, there were no changes to the Group's governance structure.

Additional information

In the normal course of business operations, a number of transactions took place between the Group and Fortegra Financial Corporation. These transactions related to the payment of costs and administrative expenses.

B.2 Fit and proper requirements

The Group has an approved Fit and Proper Policy. The Policy aims to establish the fitness and propriety requirements of the Group with the applicable legislation, regulations and standards of good practice, particularly with Article 42 of the Solvency II Directive and Chapter II - Fit and Proper of the Guidelines on System of Governance issued by EIOPA on 28th January 2015 (EIOPA - BOS-14/253).

The aim of this Policy shall be to ensure that all persons who effectively run the Group or have key functions within the Group, fulfill the following requirements at all times:

- That their professional qualifications, knowledge and experience are adequate to enable sound and prudent management;
- That they are of good repute and integrity.

The Policy shall be reviewed by management and presented to the Board of the Insurance Company, including any proposed amendments thereto, at least on an annual basis. The same Board will consider any recommendations arising from the annual review and will be required to approve any proposed revision of the Fit and Proper Policy before it becomes effective.

The Insurance Company's Board must have:

Collectively: the appropriate qualifications, experience, and knowledge in at least the following areas:

a) Insurance and financial markets;
b) Business strategy and business model;
c) System of governance;
d) Financial and actuarial analysis;
e) Regulatory framework and requirements.

Individually: training and experience appropriate to the professional profile, specifically in the insurance and financial services area, with practical experience obtained from prior positions held during a sufficient period of time.

Relevant personnel and, where applicable, outsourced personnel must have proven personal, professional and business integrity based on trustworthy information about their personal and professional conduct and reputation, including any criminal, financial and supervisory issue which is relevant for this purpose.

To this effect, relevant personnel and outsourced personnel, where applicable must meet the following requirements:

Personal, professional and business integrity

- A personal career reflecting the highest respect for company and other laws governing economic activity and business operations, as well as good sales, financial, and insurance practice;
- No criminal records related to crimes against heritage, money laundering, against the social/ economic order and against the tax authorities and social security, and fines related to offences related to infringement against the insurance industry, securities market or consumer protection;
- They must not be prevented from exercising representation in public or management positions in insurance or financial entities;
- They must not be disqualified based on the prevailing regulations.

Eligibility and compatibility

- Shall not be subject to incompatibility, disqualification or prohibition pursuant to the laws and internal regulations in force;
- Shall not find themselves in an unavoidable conflict of interest pursuant to the laws and internal regulations in force;
- Shall not hold substantial shareholdings in, or provide professional services to, competitors of the Group, or to be employees, executives or officers thereof, unless they are expressly authorised by the Insurance Company's Board;
- Shall not be involved in circumstances which may cause their appointment to or participation in the Insurance Company's Board to place the Group's interest at risk.

Assessment of fitness and properness

The Group ensures that the person is fit for position to be held by following these procedures:

- Evidence shall be provided of qualifications and degrees that are in line with the requirements of the job description, prior to the recruitment of the person in question by the Group;

- The Group shall encourage and sponsor ongoing training and personal development through attendance at seminars and courses related to the area of specialisation of the person in question.

The Group ensures that the person is proper for position to be held by following these procedures:

- A recent good conduct background check is completed and recent employment references shall be obtained prior to the employment of the person in question;

- As part of the recruiting process, at least one of the Directors, representing the shareholder, shall hold an interview with the person in question in order to ensure that the person is of integrity, honest, competent, and with the correct appetite, attitude and motivation for the position;

- The Compliance Officer shall obtain an annual declaration from every Director of the Group and persons who have submitted their Personal Questionnaire to the MFSA. This shall ensure that they have not been condemned to pay convictions, been subjected to disciplinary, administrative or other action in any court of law in relation to administrative, disciplinary or criminal offence relating to the exercise of duties as Director or Officer of the Group. Furthermore, such declaration shall confirm that they have not been subject of any ongoing investigations, enforcement actions or administrative sanctions by any relevant regulatory or professional body for non-compliance with the provisions governing banking, financial, securities, insurance activity, securities markets, payment instruments or any financial services legislation.

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

Governance structure

The Insurance Company's Board is ultimately responsible for ensuring the Risk Management System's effectiveness and for determining the Group's Risk profile and tolerance limits. Further to this, the Insurance Company's Board is also responsible for approving the Risk Management Strategies and policies within the Risk Management Framework. In performing these functions, the Insurance Company's Board is supported by the Risk Management and Compliance Committee.

The Insurance Company's risk management function facilitates the application of the Risk Management System. Its functions include the coordination of the strategies, processes and procedures that are necessary to continually identify, measure, monitor, manage and report all the risks to which the Group is exposed to, or may be exposed to.

The risk management function reports to the Insurance Company's Board through the Risk Management and Compliance Committee any risk exposures, taking into account their interdependencies, and compliance with established limits, including the ORSA.

Risk management objectives, policies, and processes

The main components of the Insurance Company's approach to Risk Management are as follows:

Risk appetite
The Insurance Company sets risk appetites for the various risk categories and appropriate measures and controls are selected and agreed for each of the risk categories. This enables regular reporting to the Board of the Insurance Company and assists the same Board in monitoring the Insurance Company's risks. The risks and controls will be refined as the business grows. Risk appetite is measured in terms of:

- Those activities and associated risk exposures within a given period of time that the Insurance Company is prepared to accept, those it will avoid, those to be transferred via insurance/ reinsurance or other contracts and those requiring mitigation through control;

- The ranking of risks within the Insurance Company's risk register, i.e. management's view as to whether the risk is adequately controlled or if further work is required to mitigate the risk to improve the resultant risk score;

- Internal Capital Assessment (ICA)

a) Total capital required to meet strategic and operational objectives; and
b) As a measure of the total risk based capital which the Insurance Company is prepared to set aside, in case of the crystallisation of significant risks. The capital to be held will be determined by the statutory requirements (under Solvency II insurers are required to hold sufficient available capital to avoid the risk of insolvency within the next year with a confidence level of 99.5%) and by the Insurance Company's Board's own risk appetite, e.g. using different measures and over a different timeframe.

Risk profiling
The risk register is used to record the risk profiling exercise. The information to be recorded in the risk register includes risk reference number/ ID, risk category, risk type, risk description, risk controls and risk tolerance.

Internal Capital Assessment
A key component of the Risk Management Framework is the Internal Capital Assessment (ICA). This assessment is used to calculate the capital required for each category of the risk that the Insurance Company is exposed to. Capital requirements are calculated at the 99.5% confidence level with a 1-year horizon, i.e. to represent a worst-case scenario of a 1 in 200-year event. The capital analysis of the risks contained within the risk register is completed at least annually during the ORSA.

Capital is managed by the Insurance Company to ensure the ongoing viability and success of the Company. Pure financial objectives are balanced with the need to set aside appropriate capital in case of adverse events, in accordance with risk appetite and the MFSA requirements.

Strategic planning
The strategic planning process is an annual process when strategy is reviewed and operating plans for future years are formulated. This process considers the Insurance Company's risk profile as recorded within the risk register, together with the current risk policies and ICA requirements.

The business objectives are determined, key challenges identified and core assumptions agreed. Scenario analysis is used to help shape strategic options at an early stage, stress tests are applied to challenge key assumptions behind strategic objectives and the overall plan, and operating plan objectives are analysed in detail to identify and assess associated risks.

Record keeping
Risk register details are retained indefinitely by the Insurance Company and include details of risk identification and assessment, risk appetite, key controls and remedial actions proposed and implemented. The following records are of particular importance:

- Risk register
- Risk Management Framework Policy, including approval of changes
- Strategic Planning documents
- Compliance exceptional reports
- Internal audit plans and reports
- Board reports and minutes

Risk assessment
The Insurance Company aims to:

- Identify the risks and identify what could affect the business and processes going forward;
- Communicate risks that crystallise to the Directors and the Risk Management and Compliance Committee;
- Ensure that controls are identified for each operational risk.

Monitoring and controlling risk
Key monitoring and control activities are undertaken by the Risk Management and Compliance Committee and ultimately the Board of the Insurance Company.

The Risk Management Policy has the following main objectives:

- To explain the Group's underlying approach to risk management, whilst giving key aspects of the risk management process, and identifying the main reporting procedures;
- To embed a culture of risk awareness within the Group;
- To make all directors, management and staff accountable for managing risk in line with their roles and responsibilities;
- To identify, prioritise, measure, manage, monitor and treat all critical risks in a consistent and effective manner;
- To report using appropriate and reliable risk management tools (including key risk indicators, risk and control self-assessments) to support risk based decision making and capital assessment;
- To comply with all relevant legislation, regulatory requirements, guidance and codes of practice;
- To provide senior management and the Insurance Company's Board with timely and dependable assurance that the organisation is managing the significant risks to its business; and
- To enable the Insurance Company's Board to review, refresh and approve the Insurance Company's Risk Management Strategy annually, as well as to follow any significant change to the business' operating model environment.

Capital is generally estimated in line with the budget for the following year, and is periodically reviewed throughout the year according to risk development, to ensure compliance with the established Risk Appetite limits.

The governing bodies of the Group receive information regarding the quantification of the main risks to which the Group is exposed and the capital resources available to absorb them, as well as information regarding compliance with Risk Appetite limits.

The ORSA is another process through which the Group monitors and identifies any material risks the company may face. A breakdown of the processes for the identification, measurement, management, monitoring, and notification of risks, by type, is set out below.

Type of Risk	Measurement and management	Monitoring and reporting
Non-life underwriting risk - Premium risk - Reserve risk - Lapse risk - Reinsurance mitigation	Standard formula	Annual
Market risk - Interest rate risk	Standard formula	Annual
Credit risk Reflects any possible losses arising from unexpected non-compliance by counterparties and debtors over the subsequent twelve months.	Standard formula	Annual
Operational risk Risk of possible losses deriving from the inadequacy or malfunction of internal processes, personnel or systems, or from external events.	Standard formula	Annual
Liquidity risk Risk that the Group might not be able to realize its investments and other assets in order to meet its financial commitments at maturity.	Liquidity position Liquidity indicators	Continuous

Compliance risk Risk of losses due to legal/ regulatory penalties or reputation losses arising from the failure to comply with laws and regulations, or with applicable administrative requirements.	Monitoring and recognition of significant events	Continuous
Strategic and corporate governance risk Includes the following risks: - Business ethics and good corporate governance - Distribution channels - Organizational structure - Market competition	Through the corporate policies aligned with the Group's business and organisational principles	Continuous

All of the calculations deriving from the standard formula are updated when there is a material change in the risk profile. The Group's Board is regularly informed of the risks to which the Group is exposed.

Own Risk and Solvency Assessment (ORSA)

The Own Risk and Solvency Assessment (ORSA) is an integrated process in the Insurance Company's Risk Management System. The ORSA is a mechanism, which identifies, measures, monitors, manages, and reports any short or long-term risks. Further, to ensure a relationship between the business strategy and the overall solvency capital level, the ORSA process is synchronised with the Group's strategic plan. Thus, the ORSA includes all the significant and potential risk that the Group might face and the measures required to mitigate them.

The ORSA is a forward looking process with a three year time horizon which is consistent with business planning, that the ORSA model is based (after demonstrating its appropriateness) on the standard formula approach therefore assuming confidence level of 99.5% and that risks not covered by the Standard Formula are looked at qualitatively or quantitatively if deemed material.

The ORSA process considers all potential risks facing the Group, using the risk appetite statement as a starting point. The Group's Board is supported in this by USA Risk Group and Milliman LLP, as set out in the Insurance Company's Governance Framework. However, the Group's Board retains ultimate responsibility for the ORSA, including approving the ORSA Policy, directing the process, challenging the assumptions, methodologies and results, and ensuring the output is taken into account in any decisions made. Save for extraordinary events, the ORSA is prepared annually and will take place during the final months of the Group's financial year, thus ensuring that the timing is aligned with the business planning process.

The risk management function also carries out capital management activities that verify the following:

- The eligibility of capital in line with the current legislation;
- The compatibility of distributable dividends for continuous compliance with the Solvency Capital Requirement;
- Continuous compliance with future solvency capital requirements;
- Amounts and quality of the various eligible capital items capable of absorbing losses.

In addition to this, the risk management function is also responsible for the preparation, submission and approval by the Insurance Company's Board of the medium-term Capital Management Plan, encompassing the results from forecasts included within the ORSA.

The Group has built validation mechanisms to ensure that the data used is complete, accurate and appropriate. Section E of this report includes more detailed information on capital management.

B.4 Internal control system

The Insurance Company within the Group is equipped with a comprehensive and effective internal control system encompassing all activities, including those carried out by third party service providers, to ensure well-ordered and efficient operations.

Due to its nature, Internal Control involves all people, irrespective of their hierarchical level within the organization, who collectively contribute to providing reasonable assurance on the achievement of the objectives mainly regarding to:

- Operations objectives: effectiveness and efficiency of operations, differentiating the insurance operations (mainly underwriting, claims, reinsurance and investment) as support operations and functions (human resources, administration, commercial, legal, IT, etc.);
- Information objectives: trustworthiness of information (financial and non-financial, both internal and external) regarding its reliability, timeliness or transparency, among others;
- Compliance objectives: compliance with applicable laws and regulations.

For its development within the organisation, the Group adopts a 'three lines of defence' Risk Management Framework for managing the uncertainty and prevention of risk as described below:

1) The first line of defence consists of functions that own and manage risk. It is made up of the employees, the management and operations, business and support departments, which are responsible of maintaining an effective control on a day- to-day basis.

2) The second line of defence consists of functions that oversee or specialise in risk management and compliance. It is made up of the key functions such as risk management, actuarial function, compliance and others assurance functions, which ensure the internal control functioning.

3) The third and final line of defence consists of functions that provide independent assurance, above all internal audit, which provides independent assessment of the adequacy, appropriateness and effectiveness of the Internal Control System and communicates eventual weaknesses timely to whom is responsible for taking the corrective measures, including Top Management and Governing Bodies, as appropriate.

The objective of the governance mechanism is to have continuous appropriate compliance, controls, incentives, communications systems and internal structures that encourage prudent effective internal decision-making and transparent operations. The Group's internal control system consists of tasks and actions that are present in all the activities of the organization and as such is fully integrated into the organisational structure of the Group.

Compliance function

The role of the compliance function is to advise the Insurance Company's Board on the laws, regulations and administrative provisions that effect the Insurance Company, hence the Group's compliance with the established regulations. Further to this, the compliance function also conducts an impact assessment of the changes in the legal environment.

The Insurance Company's compliance function is based on the specific applicable regulatory requirements, as well as the principle of proportionality based on its business volume and the nature and complexity of the risks assumed by the Group.

Moreover, the compliance function has other responsibilities as set out below:

- Maintain control schedule of required functions/ actions and ensure carried out within specified timeframes;
- Ensure all aspects of the governance framework are kept up-to-date;
- Prepare and update risk events log and report to Board;
- Report to the Board on regulatory, legislative, and other compliance matters;
- Oversee the implementation of improvements/ changes recommended by internal audit.

The Insurance Company's Compliance Policy was last updated and approved by the Board in July 2018. The Policy defines the structure and responsibilities of the compliance function.

B.5 Internal audit function

The internal audit function provides an objective, independent and value added overview of the Group's system of governance. It maintains its independence as it reports directly to the Insurance Company's Board (being the entity responsible for fulling the governance requirements) and also has free and unrestricted access to meetings and to all information considered necessary for the proper execution of the function.

Moreover, the internal audit function has other responsibilities as set out below:

- Develop and implement a flexible annual audit plan using an appropriate risk based methodology, taking into consideration any risks or control concerns identified by management. The audit plan as well and periodic updates to the plan must be shared with the Board Coordinate internal audit activities and plans with other assurance providers;
- Review and monitor functioning of internal controls;
- Assess internal control effectiveness;
- Assess appropriateness and effectiveness of overall systems of governance;
- Ensure that the internal audit resources are appropriate and effectively deployed to achieve the annual audit plan;
- Make recommendations to correct deficiencies and for improvements;
- Report to the Board of the Insurance Company, and at least annually, on the sufficiency and appropriateness of the Group's policies, practices, and controls;
- Make recommendations for remediation action in respect of any significant weaknesses, deficiencies, or matters of noncompliance and ensuring that the remediation actions are carried out.

The mission, function, attributes and obligations of the internal audit function are outlined in the Internal Audit Policy. This has been approved by the Insurance Company's Board in November 2018.

The Policy includes the rights and obligations of the Group's internal auditors, as well as their code of ethics. The primary objective is to communicate knowledge and internal audit aspects, classification of audit work, recommendations and deadlines, treatment of audit reports, and any other circumstance related to internal audit activities.

In addition to the aforementioned rights and obligations, the Group's internal auditors avail themselves of the code of ethics as spelled out in the Internal Audit charter. The code of ethics embodies the following four main requirements for internal auditors: Fit and proper, Objectivity, Confidentiality and Proficiency.

B.6 Actuarial function

The Group's actuarial function is outsourced to Milliman LLP and governed by the requirements set out in Article 48 of the Solvency II Directive. The actuarial function's oversight is the responsibility of the Finance, Actuarial and Investment Committee and the Insurance Company's Board in ensuring continuous adequacy of own funds in line with the Group's risk appetite, business strategies and regulatory Minimum Capital Requirement.

The Actuarial Function Policy sets out the basic principles and methods and the structure required to perform this function. It outlines in particular the objectives and tasks, the area of responsibility and information, disclosure and audit rights of the actuarial function. The overarching objectives of the actuarial function are defined as follows:

- to coordinate the calculation of technical provisions for the economic solvency balance sheet;
- to ensure the appropriateness of the methods and underlying models used, and of the assumptions made in the calculation of the technical provisions for the economic solvency balance sheet;
- to evaluate the adequacy and quality of the data used for calculating the technical provisions for the economic solvency balance sheet;
- to provide an opinion on general underwriting and acceptance policy; and
- to provide an opinion on the appropriateness of reinsurance agreements.

Beyond this, it is the actuarial function's objective to ensure consistency of the methods used for calculating technical provisions in areas of substantive overlap between the valuation standards of Solvency II and IFRS and to consider the impact of the valuation of technical provisions on other positions of the balance sheet.

The actuarial function performs its tasks independently. To ensure that their independence is not compromised in any way, actuarial function staff may not perform any operational tasks in risk acceptance that they are themselves responsible for monitoring. The actuarial function reports to the Board of the Insurance Company at least once a year in the form of a written Actuarial Function Report. This report contains opinions on:

- the reliability and appropriateness of the calculation of the technical provisions;
- the general underwriting and acceptance policy;
- the appropriateness of the reinsurance agreements; and
- the activities undertaken by the actuarial function, including their outcomes.

The Finance, Actuarial and Investment Committee reviews the written Actuarial Function Report and makes recommendations to the Board of the Insurance in respect of any matters arising from the report which it considers require action or improvement. The Actuarial Function on request reports once a year at a meeting of the Finance, Actuarial and Investment Committee on its activities and the results of its work.

B.7 Outsourcing

The Outsourcing Policy establishes the general principles, tasks, processes and responsibilities in the event of outsourcing of a critical and/ or important business function. The scope of this Policy is to establish the standards for implementing outsourcing arrangements for any key, critical, important operational function of the Group in full compliance with legislative and regulatory requirements.

Any outsourced key function or critical function must be notified to the MFSA.

The Insurance Company's Board retains ultimate responsibility for the discharging of any obligations related to the outsourced activity or function and must exercise due care in the selection of the service providers, ensuring that they are fit and proper and that any risk generated by the outsourced activity is managed effective. The Insurance Company's Board also remain fully responsible for any sub out-sourcing by the service provider. Furthermore, the Board must ensure that any sub-outsourcing would be notified prior to becoming effective and that it is satisfied that the ultimate service provider also meet the Group's fitness and properness requirements.

The existing governance structure ensures that the Group has sufficient control over the critical functions and/ or activities that have been outsourced, in the terms established in the Solvency II Directive and the enabling local legislation.

B.8 Any other information

There is no additional information that has not been included in the preceding sections.

C. RISK PROFILE

C. RISK PROFILE

Preliminary information

The Group is committed to implementing a continuous, proactive any systematic approach to risk management that is effected by the Insurance Company's Board and management. The Insurance Company's risk management processes are designed to identify any potential risks that may affect the operations of the Group and the support it is expected to provide to its respective stakeholders, and to manage these within an agreed upon range of risk tolerances. Risk management is applied strategically and appropriately to provide reasonable assurance that the Group will achieve its objectives.

Risk identification involves documenting the risks within the business and those influencing from the outside. The causes and consequences, together with the mitigation controls are identified for each risk. Each risk identified is assessed, in terms of impact and probability. Level of concern is expressed for each risk and represents a measure of risk appetite. The assessments of inherent risk, residual risk and level of concern are performed by the risk management function holder and reviewed by the Risk Management and Compliance Committee and ultimately the Insurance Company's Board.

The Group calculates its Solvency Capital Requirement (SCR) using the standard formula. For the main risk categories, the standard formula is considered an appropriate risk measurement tool for determining the Group's risk exposure, as it recognises the capital charge corresponding to key risks (such as underwriting, market, counterparty and operational risk).

The Group's exposure to other risks not included in the Standard Formula SCR (such as liquidity risk) is not considered significant, as the Group has effective measures in place for the management and mitigation of such risks.

This section provides detail on the breakdown of the capital requirement under Solvency II by risk module and risk sub-module. It also includes a description of the reduction and mitigation techniques used by the Group to minimise its risks. Any possible concentrations are also indicated.

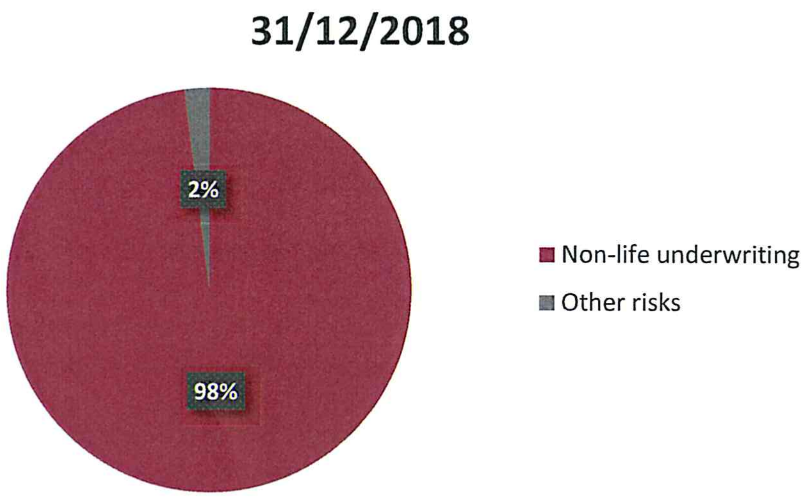
C.1 Underwriting risk

Underwriting risk is the risk of loss or of adverse change in the value of insurance liabilities, due to inadequate pricing and provisioning assumptions. The Group underwrites three lines of business through the Insurance Company:

- Motor vehicle liability insurance;
- Fire and other damage to property insurance;
- Miscellaneous financial loss.

Only the last line has been written since authorisation of the Insurance Company on 1 February, 2018.

As at 31st December 2018, underwriting risk represented 98% of all of the risk modules included in the basic SCR standard formula calculation. The following chart present details by module.



The Insurance Company has an Underwriting and Pricing Policy in place which exists to ensure that it has a clear and formal framework of underwriting principles that will provide sustainable pricing for its core functions in full compliance with the Risk Management Policy of the Group. The Policy outlines the processes and controls that are required to adequately analyse, price and manage the business it is willing to accept.

The Group minimises underwriting risk through the implementation of the following measures:

Establishing policies, limits and exclusions in underwriting risk

The insurance products sold by the Group outline the cover provided but are all subject to terms, conditions, limitations and exclusions. These are generally subject to domestic and international market standards and practices. Notwithstanding, the Insurance Company's Underwriting and Pricing Policy establishes the insurance products that can be sold or written by the Group and the lines of business that cannot be entertained. Furthermore, the Underwriting and Pricing Policy provides authority limits which detail the Gross Written Premium by function holder and define the information that is required to be submitted as part of the underwriting process.

Setting of a sufficient premium

The Group gives importance to premium sufficiency, which is supported by actuarial calculations. In relation to pricing, the Group bases its underlying assessment of risk to drive a minimum 15% margin (of net risk), achieving a loss ratio no greater than 85%.

Adequate allocation of the technical provisions

Claims handling and the sufficiency of technical provisions, are basic principles of insurance management. Technical provisions are calculated by the Group's Finance Department with the involvement of the Actuaries.

Use of reinsurance

The Group currently has no reinsurance arrangements in place. However, it intends to enter into a Quota Share Reinsurance Treaty with Lyndon Southern Insurance Company, wherein the Group would cede 30% of its business on a Quote Share basis.

The Group's objectives overall and for managing underwriting risk are as follows:

- To provide quality insured products that provide value to the end customer;
- To deploy its products and services through B2B relationships with well recognised, reputable brands only;
- To appoint partners, including brokers and TPA's that are financially sound and that are highly regarded within the industry;
- To have a clearly defined understanding of the insurance business it wishes to write;
- To refer to the Underwriting and Claims and IT Committee any business that is considered not to be within its risk appetite or is deemed to be of high risk in nature.

The Company is exposed to underwriting risk arising from natural or man-made catastrophes. To mitigate catastrophe risk, specific reinsurance coverage (as mentioned above) will be purchased to protect the Company's net retained exposure.

Claims risk

The Group utilises the expertise of outsourced TPAs to handle claims management functions. TPAs are vetted under strict guidelines and formally appointed by the Group. TPAs are required to operate under strict delegated authority in line with the terms of formal Claims Management Agreements.

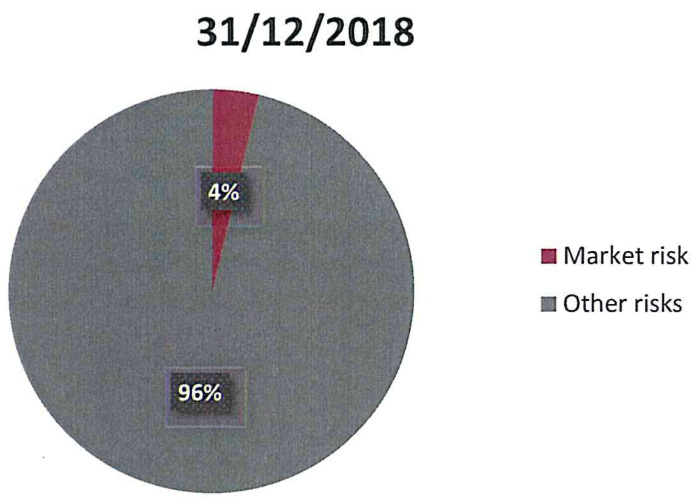
TPAs manage claim files in line with the Group's instructions and have defined limits for the payment of specific indemnities. Any claims or losses exceeding these agreed limits will be referred to the General Manager for approval prior to authorisation and payment of the claim. It must be noted that for the majority of products the claims are low value, routine claims subject to fixed pre-agreed amounts such as replacement costs or repair costs that do not involve complex loss adjustment processes. Any exceptional or large loss would be referred to the General Manager consults with the Underwriting and Claims and IT Committee members or the Board by circular email or in ad hoc meetings and refer the Committee's decision to the TPA in writing.

Within the delegated authority there will be no allowance for any declinature, denial, ex-gratia payments or commercial decision making. Any exceptions to the policy terms or guidelines will require written approval from the Underwriting and Claims and IT Committee members or the Board prior to execution.

C.2 Market risk

Market risk is the risk of loss or of adverse change in the financial situation resulting, directly or indirectly from fluctuations in the level and in the volatility of market prices of assets, liabilities and financial instruments. It is the risk that arises from fluctuations in the values of, or income from, assets. It includes risks associated with movements in interest rates, foreign exchange exposure, equity investments and valuation processes.

As at 31st December 2018, market risk represents 4% of all the risk modules included in the basic SCR standard formula calculation. The following chart present details by module.



The Group has assumed no market risk beyond interest rate risk. As the Group grows, it may diversify its asset portfolio beyond cash. In this case, the assets of the Group may be subject to the risks categorised therein. In particular, the Group may be exposed to currency risk when writing business across multiple European currencies. The Group has put in place arrangements such that liabilities falling due will be met by assets matched by currency for all of the Group's business written across Europe. However, from the point of view of the Solvency II balance sheet, in contrast to the IFRS balance sheet, an element of currency risk may arise from the expected future profit arising from the business and the recognition of this profit in the reporting currency. Due to the small volumes of business written at this time, this is not deemed to be material.

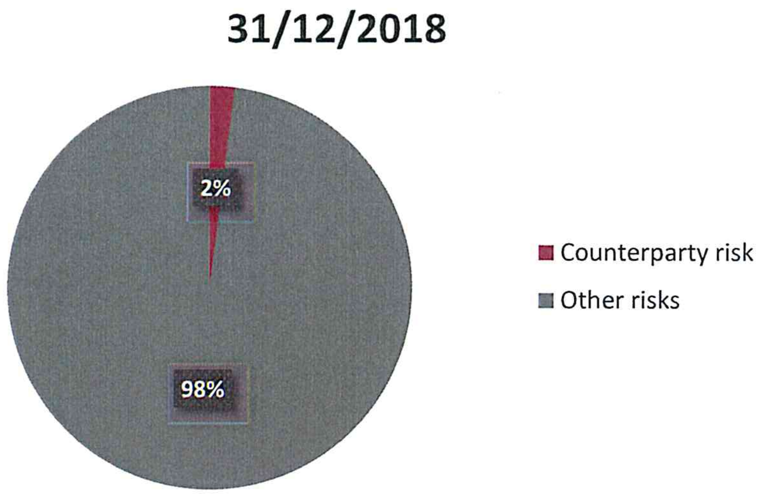
The Group mitigates its exposure to market risk through a prudent investment policy, characterised by eligible investments included within the benchmark. The Group is prohibited to invest in open-end or closed-end collective investment schemes or any commodity futures or options contracts.

The Risk Management Framework describes the framework and processes used by the Group to identify and assess risks. Risks have been identified and will be recorded in a risk register from April 2019. The risk register will be discussed formally on at least an annual basis by the Risk Management and Compliance Committee and Board. To date, at each Board meeting consideration is given to whether the Group's risk profile or risk exposure has changed due to management actions. Once identified, risks will be assessed as to their likely impact and the likelihood of their occurrence. This assessment is done both on an inherent basis (i.e. without taking account of controls and mitigations) and on a residual risk basis (i.e. the risk remaining after any mitigations). Risks will then be allocated a significance based on the combined effect of these ratings.

C.3 Credit risk

Credit risk is the risk of loss or of adverse change in the financial situation, resulting from fluctuations in the credit standing of issuers of securities, counterparties, and any debtors to which insurance undertakings are exposed, in the form of counterparty default risk.

As at 31st December 2018, the counterparty default risk represents 2% of all of the risk modules included in the basic SCR standard formula calculation. The following chart present details by module.



Counterparty default risk

The Group currently holds its majority cash resources at Fifth Third Bank and Barclays Bank, which both have a credit rating of 'A' (S&P), and is therefore exposed to counterparty default risk if bank credit is downgraded. This could occur if one or more bank(s) are impacted by material adverse financial market performance and global economic downturn, leading to an increase in the likelihood of bank failure.

There is currently no counterparty default risk on reinsurance arrangement (as no incepted reinsurance as at year-end) but should the Group enter reinsurance arrangements then, there would be a counterparty default risk capital charge on the reinsurance arrangement.

The risk management of credit risk should cover the failure of counterparty due diligence of both insurance counterparties and reinsurers. Risks that have been identified as material will be included within the risk register as from April 2019. Risk identification involves a regular, systematic review of the risks on the risk register and documentation of other new and developing risks within the business and those influencing it from outside. This risk identification phase should reflect the most current status of the undertaking's risk profile.

The risk management process will include systems and controls set out as applicable policy and procedures in respect of counter-party assessment including screening, credit risk measurement, problem exposures, provisioning and mitigation and record keeping. Each risk is classified into a risk zone denoted by green, amber or red, with the zones being aligned to the risk appetite of the Insurance Company. The risk profile is monitored by the Risk Management and Compliance Committee.

Management and mitigation techniques
Key controls in place are:

- Due diligence reviews of counterparties
- Terms of Business Agreements in place
- Regular monitoring on aged debt
- Audits of counterparties
- Review of credit ratings of counterparties
- Review of all new and renewing reinsurance transactions
- Limiting loss funds held by TPAs

C.4 Liquidity risk

Liquidity risk is the risk that insurance and reinsurance undertakings are unable to realise investments and other assets in order to settle their financial obligations when they fall due.

Liquidity risk is not included in the SCR Standard Formula calculation. Exposure to liquidity risk is considered to be low, taking into account the Group's conservative investment policy, with its investments held in cash and cash equivalent assets. Accordingly, the Group's investment risk is relatively limited.

Management and mitigation techniques
Key controls in place are:

- Cash flow monitoring and reporting
- Claim movements reports
- Claim settlement statements from business partners using in cash flow planning

C.5 Operational risk

The Group defines operational risk as the risk of loss arising from inadequate or failed internal processes, personnel or systems, or from external events. Operational risk is diverse in nature and permeates all business activities, but remains a distinct form of risk in its own right. Operational risk includes the risk associated with information systems, people, external events and strategy, process, finance and accounting, business continuity, outsourcing, regulatory and legal, security and financial crime.

Most of the operational tasks involved in the running of the Group are outsourced and therefore, most of the operational risk would result from a dysfunction within the outsourcing counterparty which is a "sister" company. The risk is possibly reduced and therefore adequately reflected within the Standard Formula.

The Group seeks to conduct its operations in accordance with market good practice and the highest standards of integrity and fair dealing issues or endorsed by the regulatory requirements, designed to protect policyholders. The operational activities of the Group are supported by appropriate suitable IT systems which are all backed up. Moreover, people risk is managed with the aim of ensuring that sufficient skilled and motivated staff are engaged in cost effective and compliant manner. Personnel who require MFSA approval (approved persons) are subject to ongoing monitoring with regards to fitness and properness requirements.

Management and mitigation techniques
Key controls in place are:

- Data back-up and recovery
- Emerging risk process
- Business continuity plan
- Training and development programme
- Conduct risk controls
- Sanction process
- Business change management

C.6 Other material risks

Non-compliance risk

Non-compliance risk is defined as the risk of incurring losses as a consequence of legal or regulatory penalties, or loss to reputation that may affect the Group as a result of not complying with laws, regulations, rules, internal and external standards or administrative requirements which should be applied to its activities.

The risk is primarily mitigated through the work performed by the compliance function who advises the Group on compliance with laws and regulations and also include an assessment of the possible impact of any changes in the legal environment on the operations of the Group and the identification and assessment of compliance risk.

Legal risk

Legal risk is defined as the event arising from a change in regulations, law or administrative procedures that may adversely affect the Group.

Over the last years, the regulatory framework to which the insurance industry is subject is being extended with new regulations both at the international and the local level. Additionally, it must be borne in mind that the Group operates in a complex environment under increasing regulatory pressures, not only in the insurance sector but also in the technological, corporate governance or criminal corporate responsibility fields, among others.

This risk is primarily mitigated through the work performed by the compliance function and through the support from the Group's legal counsel.

Cybersecurity risk

Cyber risks are those risks related to security in the use of information and communication technologies, cyberspace and the transfer, processing and storage of electronic data. These cyber risks can compromise:

- The confidentiality, integrity and availability of information handled by the Group, as well as that of the systems which store, process and/ or transmit it;
- The continuity of the Group's business activity and the services it provides to clients;
- In extreme cases, the physical security both of the facilities and of the people.

The Group relies on the Fortegra Group IT infrastructure and the various IT systems of its key service providers. Fortegra Financial Corporation is responsible for ensuring IT maintains PCI, SOX and regulatory compliance, while establishes policies and procedures that protect the Company against IT risks, including unauthorized access to information, data integrity issues and emerging cybersecurity threats.

Group risk

The Group has assumed no additional capital requirement for group risk due to the simplicity of the Group structure and the risk mitigations in place. The Group views the operational risk capital requirement of the Insurance Company as sufficient to appropriately cover group risk. There is only subsidiary company within the Group, being the Insurance Company. Given Group's structure and the current state of the business, group risk is deemed to be immaterial.

Strategic risk

The Group aims to operate an appropriate framework for limiting the possibility of strategic risk which could arise from inappropriate business decisions or the implementation of such decisions or a lack of consideration of the wider markets in which the Group operates. The Group sets a high level business strategy which is translated into a three year financial business plan, a volume plan by distribution channel and a detailed one-year budget. Performance both against budget and volume plan are reviewed quarterly.

Brexit

On 23 June 2017, British citizens voted to exit the European Union and this process is now in motion. However, the outcome of the exit negotiations is still subject to a high degree of uncertainty. While Malta-based companies will continue to be able to conduct business in the European market, it is possible that passporting into the UK market will eventually cease. However, the UK government has announced a Temporary Permissions Regime (TPR) that will enable relevant firms and funds which passport into the UK to continue operating in the UK if the passporting regime falls away abruptly when the UK leaves the EU.

The Insurance Company applied to participate in the Temporary Permissions Regime (TPR) for inbound passporting EEA Firms. A slot between October 2019 and March 2021 will be allocated to the Insurance Company in which it will need to submit its application for UK authorisation. The Board of the Insurance Company will monitor the outcome of future Brexit negotiations to ensure that prompt mitigation action can be taken at the appropriate time.

C.6 Any other information

Stress and scenario tests

The purpose of such stress and scenario tests is to determine the areas of greatest risks to the financial wellbeing of the Group. These tests allow the Insurance Company's Board to consider the impact on the internal view of required capital and to plan any actions that may be required.

Under the ORSA process, the Insurance Company's Board have directed a number of scenario tests to be carried out, a summary of which is provided below.

Scenario 1: Optimistic business plan
Given that the Insurance Company only just started underwriting business in November, the expected volumes of business are subject to a degree of uncertainty. The reason behind this first scenario is to establish the effect on the overall solvency capital requirements and already available capital from a 10% increase in business volumes written over the next 4 years. In this scenario, it was assumed that at no point during the next 4 years would the solvency ratio of the Insurance Company drop to below the target of 120%.

Scenario 2: Pessimistic business plan
The aim of the second scenario is to establish the effect on the overall solvency capital requirement of a 10% decrease in business volumes written over the next 4 years. In this scenario, it was assumed that business volumes are 10% lower than expected from 1st January 2019, with the volumes of business written in the next subsequent years also assumed to be 10% lower than expected.

Scenario 3: Downgrade of Fifth Third Bank credit rating (from A to BBB)
The Group currently holds all its cash resources at Fifth Third Bank, which has a credit rating of 'A', thus exposed to counterparty default risk. Group Directors believe that it is important to investigate the impact of the bank's credit downgrading. This scenario could be the result of material adverse financial market performance and global economic downturn. Therefore, the Group's Directors have considered a credit rating downgrade from the current 'A' to 'BBB'. It is expected that the increased probability of default increases the projected SCR.

Scenario 4: Downgrade of Fifth Third Bank credit rating (from A to BB)
Given the materiality of the exposure of the Group to counterparty risk, the Group Directors also argued to extend the third scenario and consider the rating downgrade of Fifth Third Bank credit rating from A to BB. Under the circumstances in which the likelihood of the credit rating downgrade of Fifth Third Bank is increased, the Group may look to diversify its counterparty default risk charge by moving funds to one or more other financial institutions with more favourable credit ratings.

Scenario 5: The Insurance Company to write a 30% QS Reinsurance Treaty with Lyndon Southern Insurance Company on all business written from 1 January 2019 onwards
The Insurance Company's intention is to enter into a 30% quota share Reinsurance Treaty with Lyndon Southern Insurance Company on all business written from 1 January 2019 onwards. Lyndon Southern Insurance is a member of Fortegra Financial Corporation based in Delaware, USA.

As expected, the Reinsurance Treaty will lead to an overall decrease in the solvency capital requirements of the Insurance Company over all future time periods. In addition, the introduction of the treaty is expected to improve the solvency ratio from 31 December, 2019 to 31 December, 2021. However, in this scenario, the Insurance Company will be vulnerable to deteriorations in solvency position based on the credit rating of the reinsurance counterparty.

Scenario 6: No capital injection during 2020
It is the Insurance Company's intention to inject USD7.5 million of paid-in capital into the business during 2020. As a result, this will increase the solvency ratios as at end of 2020 and 2021. It also leads to an increase in the level of counterparty default risk as a greater volume of cash is held at the bank. In the event that such a capital injection is not undertaken, it will be necessary for the Insurance Company to re-evaluate its business plan into 2021 or consider alternative sources of capital.

Based on the outcome of the stress tests and sensitivity analyses performed, the Group will continue to comply with the solvency capital requirement in the analysed situations.

D. VALUATION FOR SOLVENCY PURPOSES

D. VALUATION FOR SOLVENCY PURPOSES

D.1 Assets

The below are the main differences between the measurement of assets under Solvency II ("Solvency value") and IFRS ("Accounting value") as at 31 December, 2018.

It must be noted that the balance sheet presented is in-line with the Solvency II regulations, and therefore it was necessary to re-classify data included under certain headings in the financial statements to different headings as presented under "Accounting value" in the table below.

Assets	Solvency II Value 2018 (USD)	Accounting Value 2018 (USD)
Deferred acquisition costs	-	1,194,367
Deferred tax assets	155,389	154,065
Insurance and intermediaries receivables	333,573	333,573
Collective investments undertakings	7,597,014	7,597,014
Cash and cash equivalents	348,523	348,523
Any other assets, not elsewhere shown	-	8,403
TOTAL ASSETS	**8,434,499**	**9,635,945**

Below are the explanations of the key asset valuation differences in the table above:

Deferred acquisition costs
Under IFRS, acquisition costs can be deferred whilst for Solvency II, reserving expenses are not deferred but are taken into account fully in the technical provisions.

Deferred tax assets
Deferred taxes are measured under Solvency II as the amounts reported in the audited financial statements as adjusted by the tax impact (at different applicable rates) on the difference between the values assigned to assets and liabilities for solvency purposes and their carrying values as recognised in the financial statements and valued for tax purposes.

Under IFRS, deferred taxes are calculated on all temporary differences using a principal tax rate of 35% with the exception of investment property and freehold and other property for which deferred income taxes may be calculated using a principal tax rate of 8% or 10% of the carrying amount. The differences between the Solvency II and IFRS value of the deferred tax assets arose due to the different valuation criteria used for the following:

- Deferred acquisition costs; and
- Technical provisions.

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Deferred tax assets are recognised for all deductible temporary differences, the carry forward of unused tax credits and any unused tax losses. Deferred tax assets are recognised to the extent that it is probable that taxable profit will be available against which the deductible temporary differences, and the carry forward of unused tax credits and unused tax losses can be utilised, except:

- When the deferred tax asset relating to the deductible temporary difference arises from the initial recognition of an asset or liability in a transaction that is not a business combination and, at the time of the transaction, affects neither the accounting profit nor taxable profit or loss;
- In respect of deductible temporary differences associated with investments in subsidiaries, associates and interests in joint arrangements, deferred tax assets are recognised only to the extent that it is probable that the temporary differences will reverse in the foreseeable future and taxable profit will be available against which the temporary differences can be utilised

The carrying amount of deferred tax assets is reviewed at each reporting date and reduced to the extent that it is no longer probable that sufficient taxable profit will be available to allow all or part of the deferred tax asset to be utilised. Unrecognised deferred tax assets are re-assessed at each reporting date and are recognised to the extent that it has become probable that future taxable profits will allow the deferred tax asset to be recovered.

Insurance and intermediaries receivables

Insurance and intermediaries receivables represent the amounts past due for payments by insurers and other insurance-linked business. These payments are not included in the cash inflows of technical provisions.

Collective investments undertakings

Investments represents amounts in a money market fund, corresponding to highly liquid short-term investments that can be easily converted to fixed amounts of cash and have an insignificant risk of changes in value.

Cash and cash equivalents

Cash includes cash in hand held at Barclays Bank. For the purposes of the Solvency II balance sheet, cash and cash equivalents have been valued in accordance with IFRS.

Any other assets, not elsewhere shown

The difference between the IFRS value and the Solvency II value of USD8,403 relates to prepayments which are usually not recognised under Solvency II, unless the asset could be recognised and transferred to a third party.

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D.2 Technical provisions

The below are the main differences between the valuation of technical provisions under Solvency II and IFRS:

Technical provisions	Solvency II Value 2018 (USD)	Accounting Value 2018 (USD)
Technical provisions non-life	-	1,554,992
Best Estimate (BE)	285,827	-
Risk Margin (RM)	78,237	-
TOTAL TECHNICAL PROVISIONS	**364,064**	**1,554,992**

Following are the qualitative explanations of the key technical provision valuation differences using Solvency II criteria and those used during the preparation of the financial statements. In general terms, the main difference between the two valuation methods is the criteria framework under which each regulation falls. While under Solvency II, technical provisions are measured using market economic criteria, for financial statements, technical provisions are calculated based on accounting standards.

The Solvency II Directive 2009/138/EC stipulates that the value of technical provisions shall be equal to the sum of a best estimate and a risk margin. To calculate the solvency ratio, the Group does not make use of matching and volatility adjustments, or transitional measures for technical provisions.

Best estimate of the provision for claims outstanding
The "best estimate" for the provision for claims outstanding is based on the following principles:

- Taking into account all claims which have been incurred prior to the valuation date, regardless of whether they have been reported or not;
- It is calculated as the present value of expected future cash flows associated with the incurred claim. Projected cash flows will include payments for benefits and related expenses;
- Should there be any liabilities transferred to a counterparty, the recoverable amounts are adjusted to factor in the expected losses due to default of the counterparty;
- The best estimate considers the time value of money based on the consideration of the claim inflows and outflows.

The claim provisions in the financial statements include the provision for outstanding claims (reported or not). The claim provisions calculated based on Solvency II criteria present the following differences with respect to those calculated based on financial statement requirements:

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- The elimination of prudence margins. Using accounting standards, a certain prudence margin is generally applied to provisions to cover possible unfavourable deviations of outstanding claims. However, under Solvency II, the calculation of the claims provision must be made without including any prudence margins;
- The consideration of all cash flow sources;
- The counterparty default risk adjustment to reinsurance recoverable amounts;
- The financial discount of cash flows.

Best estimate of the provision for premiums

The "best estimate" for the premium provision is based on the following principles:

- It relates to future claims, or those which take place subsequent to the valuation date, within the remaining claim coverage period;
- It is calculated as the present value of expected cash flows associated with the current portfolio, in accordance with contract boundaries;
- Projected cash flows will include payments for benefits and related expenses: administration, acquisition, claim management, and investment management;
- Should there be any liabilities transferred to a counterparty, the recoverable amounts are adjusted to consider the expected losses due to default of the counterparty.
- The best estimate takes into account the time value of money based on an analysis of claim inflows and outflows.

As indicated previously, the calculation of this provision is comprised of the cash flows corresponding to two portfolios:

- Current portfolio which includes the following:

    - Expected claims. Two different methods may be used to calculate the present value of benefit payments:

        - ✓ The frequency and average cost method: claims are calculated as the result of exposure based on frequency assumptions and final average costs;
        - ✓ Loss ratio method: the expected claims arising from applying the ultimate loss ratio to Unearned Premium Reserve (UPR), gross of acquisition expenses.

    - Expenses attributable to the current portfolio: acquisition (no commissions), administration, chargeable to benefits, investment expenses, as well as other technical expenses.

- Future business which includes the following

    - Premiums for policies, which have not yet been renewed but include company commitments to renew. This calculation includes the future behaviour of the

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policyholders based on the application of an estimated lapse ratio;

- Expected loss ratio relating to future premiums. The same methods indicated for the current portfolio may be used;
- Expenses attributable to future premiums (charged expense-to-premium ratio applied to future premiums): acquisition expenses (including commissions), administration, chargeable to benefits, investment expenses, as well as other technical expenses.

Under IFRS, this provision is recognised under the unearned premium reserve, which is calculated on a policy-by-policy basis, reflecting the premium rate on a pro-rata temporary basis for the unearned period of such policies and complemented by the unexpired risk provision calculated segment-by-segment where applicable. The provision supplements the unearned premium reserve with an amount by which the future contractual cash flows arising from such reserve exceed the same reserve.

Risk margin
The risk margin is the cost of providing the capital to cover the SCR over the lifetime of the liabilities. It is intended to ensure that the value of the technical provisions is equivalent to the amount that an insurer would be expected to require in order to take over and meet the insurance obligations.

The calculation of the risk margin complies with the technical specifications set in Articles 37 to 39 of the Delegated Acts.

Degree of uncertainty associated with the amount of technical provisions
The value of technical provisions is directly linked to estimates and projections for future cash flows, which might be subject to a number of factors of uncertainly, which are mainly the following:

- The probability that the obligation will materialise with regard to future cash flows;
- The timing of the claim;
- Potential amount of the future cash flows;
- The risk-free interest rate.

These factors are generally estimated based on expert opinions within the area, or using market data.

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D.3 Other liabilities

The below are the main differences between the measurement of other liabilities under Solvency II and IFRS:

Other liabilities	Solvency II Value 2018 (USD)	Accounting Value 2018 (USD)
Total technical provisions	**364,064**	**1,554,992**
Insurance and intermediaries payables	314,614	314,614
Payables (trade, not insurance)	491,230	491,230
Any other liabilities, not elsewhere shown	93,333	93,333
TOTAL LIABILITIES	**1,263,241**	**2,454,169**

Insurance and intermediaries payables
For the purpose of the Solvency II balance sheet, the valuation is considered consistent with that under IFRS, valued at the amount at which they may be transferred or settled between duly-informed interested parties carrying out transactions under mutually-independent conditions.

Payables (trade, not insurance)
This section includes other payables unrelated to the insurance business. For the purposes of the Solvency II balance sheet, the valuation is considered consistent with that under IFRS, valued at the amount at which they may be transferred or settled between duly-informed interested parties carrying out transactions under mutually-independent conditions.

Any other liabilities, not elsewhere shown
"Any other liabilities, not elsewhere shown" include accruals for the period. For the purpose of the Solvency II balance sheet, the valuation is considered consistent with that under IFRS, valued at the amount at which they may be transferred or settled between duly-informed interested parties carrying out transactions under mutually-independent conditions.

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D.4 Alternative methods for valuation

No alternative valuation methods have been used.

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D.5 Any other information

There is no other significant information regarding the valuation of assets and liabilities that has not been included in the preceding sections.

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E. CAPITAL MANAGEMENT

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E. CAPITAL MANAGEMENT

E.1 Own funds

Equity objectives, policies and management processes

The Capital Management Policy aims to establish standards for the efficient management of capital, to meet the needs of the business in consideration of the overall objectives of the Group. This includes the capital required to support the risk appetite identified in the risk policies of the Group together with a margin for safety, in full compliance with the regulatory requirements.

This Policy, together with the methods of assessment of capital adequacy will be reviewed at least annually by the Board, to ensure its ongoing fitness for purpose. The Board will consider any recommendations arising from the review and will approve any proposed revision before it becomes effective.

Capital management is the collection of processes and activities undertaken to ensure that sufficient capital and reserves (including risk based capital) are maintained, in an economic fashion to ensure the undertaking's ability to meet liabilities particularly in the case of losses arising from adverse events.

Capital management includes the assessment of capital required to support the plans and objectives of the Group, the structure of its equity and retained earnings, arrangements to secure capital, and the ongoing monitoring of capital against business requirements, as well as the assessments required by the MFSA, including future Solvency II requirements.

Should the eligible capital be insufficient at any time during the period covered in the three-year projections, in line with the ORSA, the Group should propose future management measures to remedy such insufficiency and maintain the solvency levels within the levels established in the applicable regulations and the risk appetite. The medium-term capital management plan prepared by the Group must at least take into account the following:

a) The capital required to support the existing business and profit targets;
b) Regulatory capital requirements, based on relevant solvency frameworks for the respective future planning period, particularly the MCR and the SCR over the planning period and the capital requirements as projected by the ORSA;
c) The planned dividends, if any, and their impact on eligible capital.

During 2018, there were no significant changes to the objectives, policies and processes used to manage the Group's own funds.

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Structure, amount, and quality of own funds

As stipulated in the Solvency II regulations, own funds are classified as either basic or ancillary. They are also classified by Tiers (1, 2, or 3) depending on the characteristics determining their availability to absorb losses.

Tier 1 'own funds' include ordinary share capital, non-cumulative preference shares and relevant sub-ordinated liabilities. All distributions on tier 1 items must be cancelled in the event of a breach of the SCR and repayment of principal must be suspended. Preference shares and sub-ordinated debt will be subject to a new 'loss absorption' requirement which could involve writing off all amounts owed by the insurer. Instruments which do not meet the tier 1 requirements on permanence or loss absorbency may still be categorised as tier 2 or tier 3 items.

As at 31 December, 2018, the unrestricted basic Tier 1 own funds of the Group consist of ordinary share capital.

Tier 2 'own funds' are likely to include cumulative preference shares, and sub-ordinated liabilities with a shorter duration. As at 31 December, 2018, the Group had no tier 2 'own funds'.

Tier 3 'own funds' are intended (by the Solvency II Directive) to catch own funds which do not satisfy the tier 1 or tier 2 requirements but it appears (from the 5 year minimum duration), and the requirement for supervisory approval before redemption, that there may be other requirements for tier 3 instruments. As at 31st December, 2018, the Group had no tier 3 'own funds'.

All of the own funds of the Group are basic own funds. There are no limitations on their eligibility to cover the SCR and MCR and have the maximum availability for absorbing losses. None of the own fund Items required supervisory approval.

The following reflects the structure, amount and quality of own funds, as well as the Group's coverage ratios i.e. the ratio of eligible own funds to SCR and MCR:

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	Total 2018	Tier 1 - unrestricted 2018	Tier 1 - restricted 2018	Tier 2 2018	Tier 3 2018
Basic own funds before deduction for participations in other financial sector					
Ordinary share capital (gross of own shares)	7,490,000.00	7,490,000.00			
Non-available called but not paid in ordinary share capital at group level					
Share premium account related to ordinary share capital					
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings					
Subordinated mutual member accounts					
Non-available subordinated mutual member accounts at group level					
Surplus funds					
Non-available surplus funds at group level					
Preference shares					
Non-available preference shares at group level					
Share premium account related to preference shares					
Non-available share premium account related to preference shares at group level					
Reconciliation reserve	(474,131.63)	(474,131.63)			
Subordinated liabilities					
Non-available subordinated liabilities at group level					
An amount equal to the value of net deferred tax assets	155,388.97				155,388.97
The amount equal to the value of net deferred tax assets not available at the group level					
Other items approved by supervisory authority as basic own funds not specified above					
Non available own funds related to other own funds items approved by supervisory authority					
Minority interests (if not reported as part of a specific own fund item)					
Non-available minority interests at group level					
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds					
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds					
Deductions					
Deductions for participations in other financial undertakings, including non-regulated undertakings carrying out financial activities					
whereof deducted according to art 228 of the Directive 2009/138/EC					
Deductions for participations where there is non-availability of information (Article 229)					
Deduction for participations included by using D&A when a combination of methods is used					
Total of non-available own fund items					
Total deductions					
Total basic own funds after deductions	7,171,257.35	7,015,868.37	-	-	155,388.97
Ancillary own funds					

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Unpaid and uncalled ordinary share capital callable on demand					
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand					
Unpaid and uncalled preference shares callable on demand					
A legally binding commitment to subscribe and pay for subordinated liabilities on demand					
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC					
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC					
Supplementary members calls under first subparagraph of Article 96(3) of the Directive					
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC					
Non available ancillary own funds at group level					
Other ancillary own funds					
Total ancillary own funds					
Own funds of other financial sectors					
Credit institutions, investment firms, financial institutions, alternative investment fund managers, UCITS management companies – total					
Institutions for occupational retirement provision					
Non regulated entities carrying out financial activities					
Total own funds of other financial sectors					
Own funds when using the D&A, exclusively or in combination of method 1					
Own funds aggregated when using the D&A and combination of method					
Own funds aggregated when using the D&A and combination of method net of IGT					
Total available own funds to meet the consolidated group SCR (excluding own funds from other financial sector and from the undertakings included via D&A)	7,171,257.35	7,015,868.37	-	-	155,388.97
Total available own funds to meet the minimum consolidated group SCR					
Total eligible own funds to meet the consolidated group SCR (excluding own funds from other financial sector and from the undertakings included via D&A)	7,171,257.35	7,015,868.37	-	-	155,388.97
Total eligible own funds to meet the minimum consolidated group SCR	7,015,868.37	7,015,868.37	-	-	
Consolidated Group SCR	2,378,691.20				
Minimum consolidated Group SCR	2,862,500.00				
Ratio of Eligible own funds to the consolidated Group SCR (excluding other financial sectors and the undertakings included via D&A)	301.48%				
Ratio of Eligible own funds to Minimum Consolidated Group SCR	245.10%				
Total eligible own funds to meet the group SCR (including own funds from other financial sector and from the undertakings included via D&A)	7,171,257.35	7,015,868.37	-	-	155,388.97
SCR for entities included with D&A method					
Group SCR	2,378,691.20				
Ratio of Eligible own funds to group SCR including other financial sectors and the undertakings included via D&A	301.48%				

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	Total 2018
Reconciliation reserve	
Excess of assets over liabilities	7,171,257.35
Own shares (held directly and indirectly)	
Foreseeable dividends, distributions and charges	
Other basic own fund items	7,645,388.97
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	
Other non available own funds	
Reconciliation reserve	(474,131.63)
Expected profits	
Expected profits included in future premiums (EPIFP) - Life business	
Expected profits included in future premiums (EPIFP) - Non-life business	
Total Expected profits included in future premiums (EPIFP)	

Difference between the equity in the financial statements and the excess of assets over liabilities for Solvency II purposes

When valuing assets and liabilities for the purposes of Solvency II, different criteria are used from those applied when preparing the financial statements. The above criteria differences lead to differences between the equity stated in the financial statements and excess of assets over liabilities for Solvency II purposes.

As at 31st December 2018, the excess of assets over liabilities for Solvency II purposes amounted to USD7.17 million, while equity in the financial statements totalled USD7.18 million.

The main adjustments that arise from the reconciliation of equity in the financial statements and own funds under Solvency II may be observed below:

	2018
Equity (IFRS value)	7,181,776
Difference in valuation of assets	**(1,201,446)**
Deferred acquisition costs (DAC)	(1,194,367)
Deferred tax asset	1,324
Any other assets, not elsewhere shown	(8,403)
Difference in the valuation of liabilities	**1,190,928**
Technical provisions	1,190,928
Excess of assets over liabilities	**7,171,258**

The quantitative and qualitative explanations are provided in Sections D.1 Assets, D.2 Technical Provisions and D.3 Other liabilities, in this report.

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E.2 Solvency capital requirement (SCR) and minimum capital requirement (MCR)

General principles

Solvency II provides for two separate levels of solvency capital requirements: (i) the Minimum Capital Requirement (MCR), which applies at Group level and is the amount of own funds below which policyholders and beneficiaries are exposed to an unacceptable level of risk should the insurance companies be allowed to continue its operations, and (ii) the Solvency Capital Requirements (SCR), which applies at both insurance company and group level and corresponds to the level of eligible own funds that enables insurance companies to absorb significant losses and that gives reasonable assurance to policyholders and beneficiaries that payments will be made when due.

Solvency Capital Requirement (SCR)

The SCR corresponds to the own funds that the Group must hold to limit the probability of bankruptcy to one case per 200, or that the Group is still 99.5% able to meet its commitments to insurance beneficiaries or policyholders during the following year.

As stipulated in the Solvency II Directive, all the unrestricted basic Tier 1 own funds are eligible to cover the SCR. To calculate the SCR, the Group does not use any simplifications for any of its' risk modules.

The Group's SCR Ratio is equal to 301.48%. The solvency ratio measures the relationship between the eligible own funds and the solvency capital requirements, and was calculated using the standard formula. The ratio shows the Group's significant capital buffer to absorb extraordinary losses deriving from a 1-in-200 year adverse scenario.

The SCR at risk module level and calculated using the Standard Formula is set out below:

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	Gross solvency capital requirement USD
Market risk	88,056.45
Counterparty default risk	47,416.04
Life underwriting risk	-
Health underwriting risk	-
Non-life underwriting risk	2,322,283.86
Diversification	(87,639.95)
Intangible asset risk	-
Basic Solvency Capital Requirement	**2,370,116.39**

Calculation of Solvency Capital Requirement	Amount USD
Adjustment due to RFF/MAP nSCR aggregation	
Operational risk	8,574.81
Loss-absorbing capacity of technical provisions	
Loss-absorbing capacity of deferred taxes	
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	
Solvency Capital Requirement excluding capital add-on	2,378,691.20
Capital add-ons already set	
Solvency capital requirement for undertakings under consolidated method	2,378,691.20
Other information on SCR	
Capital requirement for duration-based equity risk sub-module	
Total amount of Notional Solvency Capital Requirements for remaining part	
Total amount of Notional Solvency Capital Requirements for ring fenced funds	
Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	
Diversification effects due to RFF nSCR aggregation for article 304	
Method used to calculate the adjustment due to RFF/MAP nSCR aggregation	No adjustment
Net future discretionary benefits	
Minimum consolidated group solvency capital requirement	2,862,500.00
Information on other entities	
Capital requirement for other financial sectors (Non-insurance capital requirements)	
Capital requirement for other financial sectors (Non-insurance capital requirements) - Credit institutions, investment firms and financial institutions, alternative investment funds managers,	
Capital requirement for other financial sectors (Non-insurance capital requirements) - Institutions	
Capital requirement for other financial sectors (Non-insurance capital requirements) - Capital requirement for non- regulated entities carrying out financial activities	
Capital requirement for non-controlled participation requirements	
Capital requirement for residual undertakings	
Overall SCR	
SCR for undertakings included via D and A	
Solvency capital requirement	2,378,691.20

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Minimum Capital Requirement (MCR)

The MCR is the minimum level of security under which financial resources should never fall. When the amount of eligible basic own funds falls below the MCR, the policyholders and beneficiaries are exposed to an unacceptable level of risk, should the Group continue with its business.

All the basic unrestricted Tier 1 own funds are eligible to cover the MCR.

The ratio of eligible own funds to MCR is equal to 245.10%.

Other information

Items deducted from own funds
The Group did not deduct any items from own funds.

Own funds issued and instruments surrendered
The Group did not issue or surrender any own fund instruments during 2018.

Transitional measures
The Group did not consider any basic own-fund items subject to the transitional arrangements referred to in Article 308b(9) and 308b(10) of the Solvency II Directive 2009/138/EC to be applicable.

MG

Ian Coppini
Certified Public Accountant
Director, Deloitte Audit Limited

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

The Group did not use the duration-based equity risk sub-module set out in Article 304 of the Solvency II Directive 2009/138/EC for the calculation of its Solvency Capital Requirement.

MG

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

The Group does not make use of internal models in its Solvency calculations, but follows the Solvency II Standard formula.

MG

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E.5 Non-compliance with the Minimum Capital Requirement and Non-compliance with the Solvency Capital Requirement

As at 31 December, 2018, the Group had a good solvency position and therefore, it was considered unnecessary to adopt any other action or corrective measure.

MG

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E.6 Any other information

There is no other information regarding the management of capital that has not been included in the preceding sections.

MG

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Director, Deloitte Audit Limited

APPENDIX 1 – QUANTITATIVE REPORTING TEMPLATES

S.02.01.01.01

Balance sheet

		Solvency II value	Statutory accounts value
		C0010	C0020
Assets			
Goodwill	R0010		
Deferred acquisition costs	R0020		1194367
Intangible assets	R0030		
Deferred tax assets	R0040	155389	154065
Pension benefit surplus	R0050		
Property, plant & equipment held for own use	R0060		
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	7597014	7597014
Property (other than for own use)	R0080		
Holdings in related undertakings, including participations	R0090		
Equities	R0100		
Equities - listed	R0110		
Equities - unlisted	R0120		
Bonds	R0130		
Government Bonds	R0140		
Corporate Bonds	R0150		
Structured notes	R0160		
Collateralised securities	R0170		
Collective Investments Undertakings	R0180	7597014	7597014
Derivatives	R0190		
Deposits other than cash equivalents	R0200		
Other investments	R0210		
Assets held for index-linked and unit-linked contracts	R0220		
Loans and mortgages	R0230		
Loans on policies	R0240		
Loans and mortgages to individuals	R0250		
Other loans and mortgages	R0260		
Reinsurance recoverables from:	R0270		
Non-life and health similar to non-life	R0280		
Non-life excluding health	R0290		
Health similar to non-life	R0300		
Life and health similar to life, excluding health and index-linked and unit-linked	R0310		
Health similar to life	R0320		
Life excluding health and index-linked and unit-linked	R0330		
Life index-linked and unit-linked	R0340		
Deposits to cedants	R0350		
Insurance and intermediaries receivables	R0360	333572	333572
Reinsurance receivables	R0370		
Receivables (trade, not insurance)	R0380		
Own shares (held directly)	R0390		
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400		
Cash and cash equivalents	R0410	348522	348522
Any other assets, not elsewhere shown	R0420		8403
Total assets	R0500	8434498	9635945
Liabilities			
Technical provisions – non-life	R0510	364064	1554992
Technical provisions – non-life (excluding health)	R0520	364064	1554992
Technical provisions calculated as a whole	R0530		
Best Estimate	R0540	285827	
Risk margin	R0550	78237	
Technical provisions - health (similar to non-life)	R0560		
Technical provisions calculated as a whole	R0570		
Best Estimate	R0580		
Risk margin	R0590		
Technical provisions - life (excluding index-linked and unit-linked)	R0600		
Technical provisions - health (similar to life)	R0610		
Technical provisions calculated as a whole	R0620		
Best Estimate	R0630		
Risk margin	R0640		
Technical provisions – life (excluding health and index-linked and unit-linked)	R0650		
Technical provisions calculated as a whole	R0660		
Best Estimate	R0670		
Risk margin	R0680		
Technical provisions – index-linked and unit-linked	R0690		
Technical provisions calculated as a whole	R0700		
Best Estimate	R0710		
Risk margin	R0720		
Other technical provisions	R0730		
Contingent liabilities	R0740		
Provisions other than technical provisions	R0750		
Pension benefit obligations	R0760		
Deposits from reinsurers	R0770		
Deferred tax liabilities	R0780	0	
Derivatives	R0790		
Debts owed to credit institutions	R0800		
Financial liabilities other than debts owed to credit institutions	R0810		
Insurance & intermediaries payables	R0820	314614	314614
Reinsurance payables	R0830		
Payables (trade, not insurance)	R0840	491230	491230
Subordinated liabilities	R0850		
Subordinated liabilities not in Basic Own Funds	R0860		
Subordinated liabilities in Basic Own Funds	R0870		
Any other liabilities, not elsewhere shown	R0880	93333	93333
Total liabilities	R0900	1263241	2454169
Excess of assets over liabilities	R1000	7171257	7181777

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Director, Deloitte Audit Limited

S.23.01.04
Own funds

S.23.01.04.01
Own funds

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector						
Ordinary share capital (gross of own shares)	R0010	7490000	7490000			
Non-available called but not paid in ordinary share capital at group level	R0020					
Share premium account related to ordinary share capital	R0030					
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040					
Subordinated mutual member accounts	R0050					
Non-available subordinated mutual member accounts at group level	R0060					
Surplus funds	R0070					
Non-available surplus funds at group level	R0080					
Preference shares	R0090					
Non-available preference shares at group level	R0100					
Share premium account related to preference shares	R0110					
Non-available share premium account related to preference shares at group level	R0120					
Reconciliation reserve	R0130	-474132	-474132			
Subordinated liabilities	R0140					
Non-available subordinated liabilities at group level	R0150					
An amount equal to the value of net deferred tax assets	R0160	155389				155389
The amount equal to the value of net deferred tax assets not available at the group level	R0170					
Other items approved by supervisory authority as basic own funds not specified above	R0180					
Non available own funds related to other own funds items approved by supervisory authority	R0190					
Minority interests (if not reported as part of a specific own fund item)	R0200					
Non-available minority interests at group level	R0210					
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds						
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220					
Deductions						
Deductions for participations in other financial undertakings, including non-regulated undertakings carrying out financial activities	R0230					
whereof deducted according to art 228 of the Directive 2009/138/EC	R0240					
Deductions for participations where there is non-availability of information (Article 229)	R0250					
Deduction for participations included by using D&A when a combination of methods is used	R0260					
Total of non-available own fund items	R0270					
Total deductions	R0280					
Total basic own funds after deductions	R0290	7171257	7015868	0	0	155389
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300					
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310					
Unpaid and uncalled preference shares callable on demand	R0320					
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330					
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340					
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350					
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360					
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370					
Non available ancillary own funds at group level	R0380					
Other ancillary own funds	R0390					
Total ancillary own funds	R0400					
Own funds of other financial sectors						
Credit institutions, investment firms, financial institutions, alternative investment fund managers, UCITS management companies – total	R0410					
Institutions for occupational retirement provision	R0420					
Non regulated entities carrying out financial activities	R0430					
Total own funds of other financial sectors	R0440					
Own funds when using the D&A, exclusively or in combination of method 1						
Own funds aggregated when using the D&A and combination of method	R0450					
Own funds aggregated when using the D&A and combination of method net of IGT	R0460					
Total available own funds to meet the consolidated group SCR (excluding own funds from other financial sector and from the undertakings included via D&A)	R0520	7171257	7015868	0	0	155389
Total available own funds to meet the minimum consolidated group SCR	R0530					
Total eligible own funds to meet the consolidated group SCR (excluding own funds from other financial sector and from the undertakings included via D&A)	R0560	7171257	7015868	0	0	155389
Total eligible own funds to meet the minimum consolidated group SCR	R0570	7015868	7015868	0	0	
Consolidated Group SCR	R0590	2378691				
Minimum consolidated Group SCR	R0610	2862500				
Ratio of Eligible own funds to the consolidated Group SCR (excluding other financial sectors and the undertakings included via D&A)	R0630	301.48%				
Ratio of Eligible own funds to Minimum Consolidated Group SCR	R0650	245.10%				
Total eligible own funds to meet the group SCR (including own funds from other financial sector and from the undertakings included via	R0660	7171257	7015868	0	0	155389
SCR for entities included with D&A method	R0670					
Group SCR	R0680	2378691				
Ratio of Eligible own funds to group SCR including other financial sectors and the undertakings included via D&A	R0690	301.48%				

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Director, Deloitte Audit Limited

S.23.01.04.02

Reconciliation reserve

		C0060
Reconciliation reserve		
Excess of assets over liabilities	R0700	7171257
Own shares (held directly and indirectly)	R0710	
Foreseeable dividends, distributions and charges	R0720	
Other basic own fund items	R0730	7645389
Adjustment for restricted own fund items in respect of matching adjustm	R0740	
Other non available own funds	R0750	
Reconciliation reserve	R0760	-474132
Expected profits		
Expected profits included in future premiums (EPIFP) - Life business	R0770	
Expected profits included in future premiums (EPIFP) - Non-life business	R0780	
Total Expected profits included in future premiums (EPIFP)	R0790	

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S.25.01.04

Solvency Capital Requirement - for groups on Standard Formula

S.25.01.04.01

Basic Solvency Capital Requirement

Article 112	Z0010	No

		Net solvency capital requirement	Gross solvency capital requirement	Allocation from adjustments due to RFF and Matching adjustments portfolios
		C0030	C0040	C0050
Market risk	R0010	88056	88056	
Counterparty default risk	R0020	47416	47416	
Life underwriting risk	R0030	0	0	
Health underwriting risk	R0040	0	0	
Non-life underwriting risk	R0050	2322284	2322284	
Diversification	R0060	-87640	-87640	
Intangible asset risk	R0070	0	0	
Basic Solvency Capital Requirement	R0100	2370116	2370116	

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S.25.01.04.02

Calculation of Solvency Capital Requirement

Article 112	Z0010	No

		Value
		C0100
Adjustment due to RFF/MAP nSCR aggregation	R0120	
Operational risk	R0130	8575
Loss-absorbing capacity of technical provisions	R0140	
Loss-absorbing capacity of deferred taxes	R0150	
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	
Solvency Capital Requirement excluding capital add-on	R0200	2378691
Capital add-ons already set	R0210	
Solvency capital requirement for undertakings under consolidated method	R0220	2378691
Other information on SCR		
Capital requirement for duration-based equity risk sub-module	R0400	
Total amount of Notional Solvency Capital Requirements for remaining part	R0410	
Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420	
Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	R0430	
Diversification effects due to RFF nSCR aggregation for article 304	R0440	
Method used to calculate the adjustment due to RFF/MAP nSCR aggregation	R0450	No adjustment
Net future discretionary benefits	R0460	
Minimum consolidated group solvency capital requirement	R0470	2862500
Information on other entities		
Capital requirement for other financial sectors (Non-insurance capital requirements)	R0500	
Capital requirement for other financial sectors (Non-insurance capital requirements) - Credit institutions, investment firms and financial institutions, alternative investment funds managers, UCITS management companies	R0510	
Capital requirement for other financial sectors (Non-insurance capital requirements) - Institutions for occupational retirement provisions	R0520	
Capital requirement for other financial sectors (Non-insurance capital requirements) - Capital requirement for non- regulated entities carrying out financial activities	R0530	
Capital requirement for non-controlled participation requirements	R0540	
Capital requirement for residual undertakings	R0550	
Overall SCR		
SCR for undertakings included via D and A	R0560	
Solvency capital requirement	R0570	2378691

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S.05.01.01.01

		Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)												Line of Business for: accepted non-proportional reinsurance				Total
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Health	Casualty	Marine, aviation, transport	Property	
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0200
Premiums written																		
Gross - Direct Business	R0110												1593169					1593169
Gross - Proportional reinsurance accepted	R0120												0					0
Gross - Non-proportional reinsurance accepted	R0130																	0
Reinsurers' share	R0140												0					0
Net	R0200												1593169					1593169
Premiums earned																		
Gross - Direct Business	R0210												45030					45030
Gross - Proportional reinsurance accepted	R0220												0					0
Gross - Non-proportional reinsurance accepted	R0230																	0
Reinsurers' share	R0240												0					0
Net	R0300												45030					45030
Claims incurred																		
Gross - Direct Business	R0310												6853					6853
Gross - Proportional reinsurance accepted	R0320												0					0
Gross - Non-proportional reinsurance accepted	R0330																	0
Reinsurers' share	R0340												0					0
Net	R0400												6853					6853
Changes in other technical provisions																		
Gross - Direct Business	R0410												0					0
Gross - Proportional reinsurance accepted	R0420												0					0
Gross - Non- proportional reinsurance accepted	R0430																	0
Reinsurers' share	R0440												0					0
Net	R0500												0					0
Expenses incurred	R0550												590630					590630
Administrative expenses																		
Gross - Direct Business	R0610												6378					6378
Gross - Proportional reinsurance accepted	R0620												0					0
Gross - Non-proportional reinsurance accepted	R0630																	0
Reinsurers' share	R0640												0					0
Net	R0700												6378					6378
Investment management expenses																		
Gross - Direct Business	R0710												6250					6250
Gross - Proportional reinsurance accepted	R0720												0					0
Gross - Non-proportional reinsurance accepted	R0730																	0
Reinsurers' share	R0740												0					0
Net	R0800												6250					6250
Claims management expenses																		
Gross - Direct Business	R0810																	0
Gross - Proportional reinsurance accepted	R0820																	0
Gross - Non-proportional reinsurance accepted	R0830																	0
Reinsurers' share	R0840																	0
Net	R0900												0					0
Acquisition expenses																		
Gross - Direct Business	R0910												26218					26218
Gross - Proportional reinsurance accepted	R0920												0					0
Gross - Non-proportional reinsurance accepted	R0930																	0
Reinsurers' share	R0940												0					0
Net	R1000												26218					26218
Overhead expenses																		
Gross - Direct Business	R1010												551784					551784
Gross - Proportional reinsurance accepted	R1020												0					0
Gross - Non-proportional reinsurance accepted	R1030																	0
Reinsurers' share	R1040												0					0
Net	R1100												551784					551784
Other expenses	R1200																	0
Total expenses	R1300																	590630

S.05.02.01

Premiums, claims and expenses by country

S.05.02.01.01 Home Country - non-life obligations

S.05.02.01.02 Top 5 countries (by amount of gross premiums written) - non-life obligations

S.05.02.01.03 Total Top 5 and home country - non-life obligations

		Home country	Country (by amount of gross premiums written) - non-life obligations	Total Top 5 and home country
		C0080	C0090	C0140
Country	R0010		UNITED KINGDOM	
Premiums written				
Gross - Direct Business	R0110	0	1593169	1593169
Gross - Proportional reinsurance accepted	R0120	0	0	0
Gross - Non-proportional reinsurance accepted	R0130	0	0	0
Reinsurers' share	R0140	0	0	0
Net	R0200	0	1593169	1593169
Premiums earned				
Gross - Direct Business	R0210	0	45030	45030
Gross - Proportional reinsurance accepted	R0220	0	0	0
Gross - Non-proportional reinsurance accepted	R0230	0	0	0
Reinsurers' share	R0240	0	0	0
Net	R0300	0	45030	45030
Claims incurred				
Gross - Direct Business	R0310	0	6853	6853
Gross - Proportional reinsurance accepted	R0320	0	0	0
Gross - Non-proportional reinsurance accepted	R0330	0	0	0
Reinsurers' share	R0340	0	0	0
Net	R0400	0	6853	6853
Changes in other technical provisions				
Gross - Direct Business	R0410	0	0	0
Gross - Proportional reinsurance accepted	R0420	0	0	0
Gross - Non-proportional reinsurance accepted	R0430	0	0	0
Reinsurers' share	R0440	0	0	0
Net	R0500	0	0	0
Expenses incurred	R0550	0	590630	590630
Other expenses	R1200			0
Total expenses	R1300			590630

S.05.02.01.04 Home Country - life obligations

S.05.02.01.05 Top 5 countries (by amount of gross premiums written) - life obligations

S.05.02.01.06 Total Top 5 and home country - life obligations

		Home country	Country (by amount of gross premiums written) - life obligations	Total Top 5 and home country
		C0220	C0230	C0280
Country	R0010			
Premiums written				
Gross	R1410			
Reinsurers' share	R1420			
Net	R1500			
Premiums earned				
Gross	R1510			
Reinsurers' share	R1520			
Net	R1600			
Claims incurred				
Gross	R1610			
Reinsurers' share	R1620			
Net	R1700			
Changes in other technical provisions				
Gross	R1710			
Reinsurers' share	R1720			
Net	R1800			
Expenses incurred	R1900			
Other expenses	R2500			
Total expenses	R2600			

S.32.01.04
Undertakings in the scope of the group

S.32.01.04.01

Undertakings in the scope of the group

							Ranking criteria (in the group currency)							
Identification code and type of code of the undertaking	Country	Legal Name of the undertaking	Type of undertaking	Legal form	Category (mutual/non mutual)	Supervisory Authority	Total Balance Sheet (for (re)insurance undertakings)	Total Balance Sheet (for other regulated undertakings)	Total Balance Sheet (non-regulated undertakings)	Written premiums net of reinsurance ceded under IFRS or local GAAP for (re)insurance undertakings	Turn over defined as the gross revenue under IFRS or local GAAP for other types of undertakings or insurance holding companies	Underwriting performance	Investment performance	Total performance
C0020	C0010	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160
LEI/213800MSUL116VLGXZ71	MALTA	Fortegra Europe Insurance Company Limited	Non-Life undertakings	Limited Liability Company	Non-mutual	MFSA	8434498			1593169				

		Criteria of influence						Inclusion in the scope of Group supervision		Group solvency calculation
Identification code and type of code of the undertaking	Accounting standard	% capital share	% used for the establishment of consolidated accounts	% voting rights	Other criteria	Level of influence	Proportional share used for group solvency calculation	Yes/No	Date of decision if art. 214 is applied	Method used and under method 1, treatment of the undertaking
C0020	C0170	C0180	C0190	C0200	C0210	C0220	C0230	C0240	C0250	C0260
LEI/213800MSUL116VLGXZ71	IFRS							Included into scope of group supervision		Method 1: Full consolidation

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VAT Reg No: MT2013 6121
Exemption number: EXO2155

Independent auditor's report

to the directors of
Fortegra Europe Insurance Company Limited

Opinion

We have audited the following relevant elements of the Group Solvency and Financial Condition Report ("Group SFCR") prepared by Fortegra Europe Insurance Company Limited (the Company) as at 31 December 2018:

- Disclosures pursuant to Articles 296, 297 and 359(d) and (2), as at 31 December 2018 ('the Narrative Disclosures subject to audit'); and
- Group templates S.02.01.01, S.23.01.04, S.25.01.04 ('the Group Templates subject to audit').

The Narrative Disclosures subject to audit and the Group Templates subject to audit are collectively referred to as the 'relevant elements of the Group SFCR'.

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:

- the 'Introduction', 'Executive summary', 'Business and performance', 'System of governance' and 'Risk profile' elements of the SFCR; and
- Group templates S.05.01.01, S.05.02.01, S.32.01.04.

To the extent the information subject to audit in the relevant elements of the Group SFCR 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 SFCR of the Company as at 31 December 2018 is prepared, in all material respects, in accordance with the Insurance Business Act (Cap. 403), regulations and Insurance Rules issued thereunder, the Commission Delegated Regulation and the European Commission Implementing Regulation (EU) 2015/2452 (hereafter referred to as "the relevant legislation").

Basis for Opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs). Our responsibilities under those standards are further described in the *Auditor's 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 Company in accordance with the International Ethics Standards Board for Accountants' *Code of Ethics for Professional Accountants* (IESBA Code) together with the *Accountancy Profession (Code of Ethics for Warrant Holders) Directive* (Maltese Code) that are relevant to our audit of the relevant elements of the Group SFCR in Malta, and we have fulfilled our other ethical responsibilities in accordance with the IESBA Code and the Maltese Code. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Emphasis of Matter – Basis of Accounting

We draw attention to the 'Valuation for Solvency Purposes' and 'Capital Management' sections of the Group SFCR, which describe the basis of accounting. The Group SFCR is prepared in compliance with the financial reporting provisions of the Solvency II regulations, and therefore in accordance with a special purpose financial reporting framework. As a result, the Group SFCR may not be suitable for another purpose. Our opinion is not modified in respect of these matters.

Deloitte.

Independent auditor's report (continued)

to the directors of
Fortegra Europe Insurance Company Limited

Other Information
The Directors are responsible for the Other Information.

Our opinion on the relevant elements of the Group SFCR 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 SFCR, 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 SFCR, 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 SFCR 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 relation to these matters.

Responsibilities of the Directors for the Group Solvency and Financial Condition Report
The Directors are responsible for the preparation of the Group SFCR in accordance with the financial reporting provisions contained in the relevant legislation referred to above. In accordance with section 8.9 and paragraph 8.11.1 of Chapter 8 of the Insurance Rules, the Directors are responsible for having in place appropriate systems and structures to meet the Company's public disclosure requirements in relation to the Group SFCR and for the approval of the Group SFCR.

The Directors are also responsible to have the necessary internal controls to enable the preparation of the Group SFCR which is free from material misstatement, whether due to fraud or error. The Directors are responsible for overseeing the Company's financial reporting process.

The Directors satisfy themselves that, throughout the financial year in question, the Company has complied in all material respects with the requirements of the relevant legislation as applicable to the Company. The Directors are also required to sign a Declaration Form, in accordance with paragraph 8.6.2 and 8.11.1 of Chapter 8 of the Insurance Rules and Annex IV to the said Chapter, for submission with the Group SFCR to the competent authority.

Auditor's 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 on the Narrative Disclosures subject to audit that the Company shall disclose and on the Templates subject to audit, in accordance with paragraph 8.10.2 and 8.11.1 of Chapter 8 of the Insurance Rules and Annex V to the said Chapter, confirming that the said relevant elements of the Group SFCR have been prepared in all material respects in accordance with the relevant legislation. Such audit is to be made in accordance with paragraph 8.10.2 and Annex V of Chapter 8 of the Insurance Rules and with International Standards on Auditing.

Our objectives are to obtain reasonable assurance about whether the relevant elements of the Group SFCR are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but it is not a guarantee that an audit conducted in accordance with ISAs 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 SFCR.

Deloitte.

Independent auditor's report (continued)

to the directors of
Fortegra Europe Insurance Company Limited

Auditor's Responsibilities for the Audit of the relevant elements of the Group Solvency and Financial Condition Report (continued)

As part of an audit in accordance with ISAs, we exercise professional judgment and maintain professional scepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the relevant elements of the Group SFCR, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control.

- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the directors.

- Conclude on the appropriateness of the directors' use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the relevant elements of the Group SFCR or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern.

- Evaluate the overall presentation, structure and content of the relevant elements of the SFCR, including the disclosures, and whether the relevant elements of the Group SFCR represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with the directors regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

Deloitte.

Independent auditor's report (continued)

to the directors of

Fortegra Europe Insurance Company Limited

Use of our Report

This report is made solely to the Directors of the Company in accordance with our engagement letter dated 21 May 2018. We acknowledge that our report will be provided to the MFSA for the use of the MFSA solely for the purposes set down by Chapter 8 of the Insurance Rules issued under the Insurance Business Act (Cap. 403). Our audit work has been undertaken so that we might state to the Company's Directors those matters we are required to state to them in an auditor's report on the relevant elements of the Group SFCR and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Company and the MFSA, for our audit work, for this report or for the opinions we have formed.

Ian Coppini as Director
In the name and on behalf of
Deloitte Audit Limited
Registered auditor
Mriehel, Malta

29 May 2019