Maersk Insurance A/S
Solvency and Financial Condition Report
Financial Year ended 31st December 2021

Executive Summary

Due to the harmonised EU-wide regulatory regime for Insurance Companies, known as Solvency II, all insurers need to publish a Solvency and Financial Condition Report ("SFCR") on the Company's public website. This is the SFCR report published by Maersk Insurance A/S (MIAS).

This report covers the Business and Performance of MIAS, its System of Governance, Risk Profile, Valuation for Solvency Purposes and Capital Management. The ultimate responsibility for all these matters is with MIAS' Board of Directors with the support of various governance and control functions that have been put in place to monitor and manage the business.

MIAS is an active retention vehicle operated as a captive for A. P. Moller – Maersk A/S and its subsidiaries, and the focus of the Board and Management Team is the orderly management of the existing book of policies in line with their policy terms and conditions. The board can make discretionary decisions on delivering insurance cover to other parts of the Maersk family, including joint ventures.

MIAS´s strategy is to insure assets, liabilities, obligations and employees of A.P. Moller – Maersk A/S or its subsidiaries or assets, liabilities, obligations and employees under management control of A.P. Moller-Maersk A/S or its subsidiaries. MIAS is required to hold sufficient capital to match its policyholder liabilities at all times and a primary responsibility of the Board is to ensure that MIAS's capital is adequate to cover the required solvency for the nature and scale of the business and the expected operational requirements of the business. A number of mechanisms are in place to evaluate those levels and the outcome of those assessments indicate that MIAS's capital is adequate at this time and for the expected requirements in the short to medium term.

The board of MIAS is involved in strategic decisions as well as significant decisions which fall outside the scope of the management.

MIAS has to a large extent outsourced the operation, including Risk Management, Compliance, Actuarial, Underwriting, Reinsurance, Claims handling, Legal, Tax, Accounting, Investment, Reporting, IT, etc. Underwriting, Reinsurance, Claims handling, Legal, Tax, Accounting, Investment, Reporting and IT are outsourced to the parent company. The Risk Management, Actuarial and Compliance functions are outsourced to external parties.

The Risk Management function operates under the defined policies and guidelines, continuously monitoring the risk exposure and maintaining a risk register covering Strategic risks, Operational risks, Market risks, Underwriting risks and Default risks. MIAS' management is informed of any significant changes to the risk picture, on a regular basis.

The insurance risks MIAS carries, i.e. mainly property and casualty risks for Marine, Logistics and Terminals and Employee Benefit Insurance, are aligned with the limits stated in the risk appetite and strategy, as established by the Board of Directors. MIAS protects itself against cumulative risk by capping its exposure at fixed maximum liability amounts through reinsurance. Once a year, MIAS performs and reports an Own Risk Solvency Assessment (ORSA) to the Danish FSA. MIAS' assets, technical provisions and other liabilities are valuated under Solvency II.

The management of own funds is governed by the Policy for Capital Structure where the overall responsibility and tasks are defined. According to this policy, the equity of the company must be sufficient to ensure the continued operation of the company and at the same time sufficient to meet all regulatory requirements. The company is constantly focusing on matters which might influence the capital structure, e.g. the company's investment policy. The value creation of the company is meant to primarily be generated from acceptance of insurance risk rather than by acceptance of investment risk. The time horizon for business planning including development of own funds is minimum 3 years.

MIAS' underwriting result (Technical Profit) for 2021 was a profit of USD 18.039 thousand and the solvency ratio by end of 2021 was 277 %.

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A. Business and Performance

A.1 Business

Maersk Insurance A/S (MIAS) was established 28 February 2011 and started operation 1 January 2012. MIAS operates as a Captive for A.P. Moller - Maersk and its subsidiaries. The board can make discretionary decisions on delivering insurance cover to other parts of the Maersk family, including joint ventures.

The Company name is: Maersk Insurance A/S

The Company address is: Esplanaden 50, 1098 Copenhagen K, Denmark

MIAS is incorporated as a privately owned company with limited liability (A/S: Aktieselskab) and is a 100 % owned subsidiary of A. P. Moller - Maersk A/S. MIAS has granted a loan to the parent company A.P. Moller - Maersk A/S according to permission from the Danish Financial Supervisory Authority (Finanstilsynet). The loan yields interest at arm's length basis. MIAS has entered into an agreement with A.P. Moller - Maersk A/S related to fees for risk management and other services for Captive operation.

MIAS is domiciled in Denmark and is under supervision from the Danish Financial Supervisory Authority (DFSA), Århusgade 110, 2100 Copenhagen Ø, and Maersk Insurance A/S´ main contact person at DFSA is: Birgitta Nielsen.

MIAS has license to conduct direct insurance and reinsurance business for the below listed non-life insurance classes:
- 1 (Accident)
- 2 (Illness/Health)
- 6 (Fully comprehensive insurance for ships)
- 8 (Fire and natural forces)
- 9 (Other damage to property)
- 12 (Third party liability for ships)
- 13 (General liability)
- 16 (Miscellaneous financial losses)

In addition to these classes MIAS conducts reinsurance businesses for the life insurance class:
- lc (complementary life insurance)

MIAS is audited by PriceWaterhouseCoopers (PWC), Strandvejen 44, 2900 Hellerup, and Maersk Insurance A/S´ main contact person at PWC is: Per Rolf Larssen.

There has been a significant change in the constellation of both the board of directors, and the audit committee in 2021. As of March16th 2021, Niclas Erlandson has taken over the role of chairman of the board, and internal member of the audit committee, from Jan Kjærvik. Niclas Erlandson is Head of Treasury and Risk in APMM. He has been approved Fit & Proper for the Board by the Danish FSA and has competencies within insurance and reinsurance, risk management, strategy development, transfer pricing, capital and solvency, and investments and has prior experience from serving on the board of a Swedish captive.

As per 1st of January 2022, the MIAS´s Board of Directors consists of:
- Niclas Erlandson (Chairman) since 16.03.2021, before this it was Jan Kjærvik
- Palle Brødsgaard Laursen
- Martin Herrstedt
- Fatiha Benali

MIAS has an audit committee, including an external independent member with accounting and audit qualifications:
- Fatiha Benali (Chairman - external)
- Niclas Erlandson (internal) from 16.03.2021, before this it was Jan Kjærvik

MIAS´s management consists of three part-time employees:

- Lars Henneberg (MD), who holds both the Actuarial (Non-Life), Risk Management and the Compliance key functions
- Steen Ragn, Key function for Actuarial (Life) and the appointed actuary
- Dan Otzen, who holds the Internal Audit key function as of April 2021.

MIAS has to a large extent outsourced the operation, including Risk Management, Compliance, Actuarial, Underwriting, Reinsurance, Claims handling, Legal, Tax, Accounting, Investment, Reporting, IT, etc. Underwriting, Reinsurance, Claims handling, Legal, Tax, Accounting, Investment, Reporting and IT are outsourced to the parent company. The Risk Management, Actuarial and Compliance functions are outsourced to external parties.

Further, MIAS operates through fronting companies in order to reduce the operational tasks to a minimum and to benefit from the operational efficiencies of large global insurance carriers. The fronting activities consist predominately of policy administration and to some extent underwriting and claims handling. Separate claims handing agreements with third parties have also been entered into.

MIAS underwrites risks within the business areas of Marine, Logistics and Terminals. MIAS underwrites non-life business such as Property and Casualty classes. As from 1st of January 2020, MIAS also underwrites Life, Disability, Medical and Accident.

More specifically, MIAS underwrites coverages for Property Damage, Hull and Machinery, incl. Collision Liability, Owner Total Loss Interest, War coverage, Natural Catastrophe, Business Interruption, Construction All Risk, Umbrella Liability, Employment Practices Liability, Pension Trustee Liability, and Specialty Risk, Terminal Operators Loss, Freight Services Liability, Cyber and Employee Benefits.

MIAS underwrites risk both as reinsurance and as direct insurance in non-life and reinsurance in life.

MIAS mitigates and protects the capital by procurement of reinsurance and retrocession. In accordance with MIAS´s reinsurance policy, all reinsurers must have a minimum A- rating by Standard & Poor’s or similar. The reinsurance enables MIAS to operate as both a net line and a gross line captive in order to reduce volatility and create diversification as a response to a changing insurance market. Further, the use of reinsurance creates a platform for MIAS to respond to market dynamics, both when the market is softening through overcapacity of capital due to increased competition between insurance carriers with growth strategies, or when the market is hardening, and the capital is withdrawn from the insurance market and the competition is less efficient.

A.2 Insurance Results

MIAS underwrites risks within the business areas of which MIAS holds a license – see A.1.

MIAS´s gross written premium in 2021 was USD 141.406 thousand with a return on equity of 7 %. MIAS's Underwriting profit (Technical Profit) for 2021 amounts to a profit of USD 18.039 thousand (2020: loss of USD 4.128 thousand).

Year	Total gross written premium	Total net earned premium	Total gross claims incurred	Total net claims incurred	Operating Expenses	Profit before tax	Combined ratio
2012	69.531	45.112	-30.768	-30.768	-2.736	12.121	74%
2013	49.919	50.797	-33.960	-33.960	-2.567	14.599	73%
2014	82.075	59.579	-28.360	-28.360	-1.557	30.365	59%
2015	76.445	54.239	-45.633	-40.458	-258	14.580	82%
2016	50.200	23.129	-3.360	-429	1.628	26.380	60%
2017	52.060	4.531	-23.043	-1.451	2.864	8.935	89%
2018	60.292	12.217	-99.099	-3.299	3.282	16.766	79%
2019	135.001	34.432	-19.997	-15.248	437	24.841	74%
2020	35.068	63.871	-85.795	-66.152	-1.872	-413	104%
2021	**141.406**	**88.835**	**-79.337**	**-65.991**	**-4.828**	**18.553**	**87%**

All monetary values are in USD thousands

The 2021 Underwriting results split per industry segment:

Segment	Gross premium written	Gross premium income	Gross claims incurred	Gross operating expenses*	Result of ceded business	Technical Result	Profit before tax
Marine	61.913	61.913	-26.359	-603	-22.864	13.683	
Fire	23.719	23.731	-29.332	-1.526	-3.676	-13.787	
General Liability	29.142	29.142	-1.584	-899	-6.380	20.421	
Miscellaneous Financial Loss	5.731	5.626	-476	-360	-5.644	-921	
Income Protection	4.715	4.781	-5.760	-349	0	-1.537	
Medical Expense Insurance	13.716	13.603	-12.374	-1.047	-293	-227	
Life Reinsurance	2.469	2.241	-1.726	-44	0	406	
Total	**141.406**	**141.037**	**-77.613**	**-4.828**	**-38.856**	**18.039**	**18.553**

*including reinsurance commission

All values are in USD thousands

For 2022, MIAS expects profitable growth and further centralisation of the insurance procurement and deployment of MIAS accordingly. The continuing consolidation of Group risks to a centralised operation from local procurement, supports MIAS's strategy to underwrite additional risks and deploy the capital most efficiently. Budgets and projections have been made on the existing business model to further develop the captive to the benefit of the Group. The company expects a modest positive result for 2022.

A.3 Investment Results

MIAS´s investments have a low risk profile. MIAS is required to maintain assets to match the policyholder´s liabilities at all times. MIAS invests in accordance with the investment policy approved by the Board of Directors.

The asset management is outsourced to the parent company. MIAS´s investment policy reflects MIAS´s risk appetite. Investments are predominately made in short-term deposits, and in a loan to the parent company.

The investment income is benchmarked up against an adequate index and is reported on a monthly basis to the management and to the board at all board meetings.

MIAS´s investment portfolio and the result from Investment activities:

Instrument	2021	2020	2019	2018	2017	2016	2015
Interest on Danish mortgage bonds					75	75	75
Interest on Government bonds					498	985	1.189
Interest loan APMM	634	2.844	3.680	3.120	1.225	973	391
Interest deposits	-62	-190	331	-99	31	-115	6
Value adjustments	-35	1.102	1.237	1.545	1.162	188	-315
Total	**537**	**3.756**	**5.248**	**4.566**	**2.991**	**2.106**	**1.346**

All values are in USD thousands

The result of the investment activities was satisfactory considering the very low interest rates prevailing during 2021.

A.4 Results of other Activities

MIAS does not perform other activities generating other income or results.

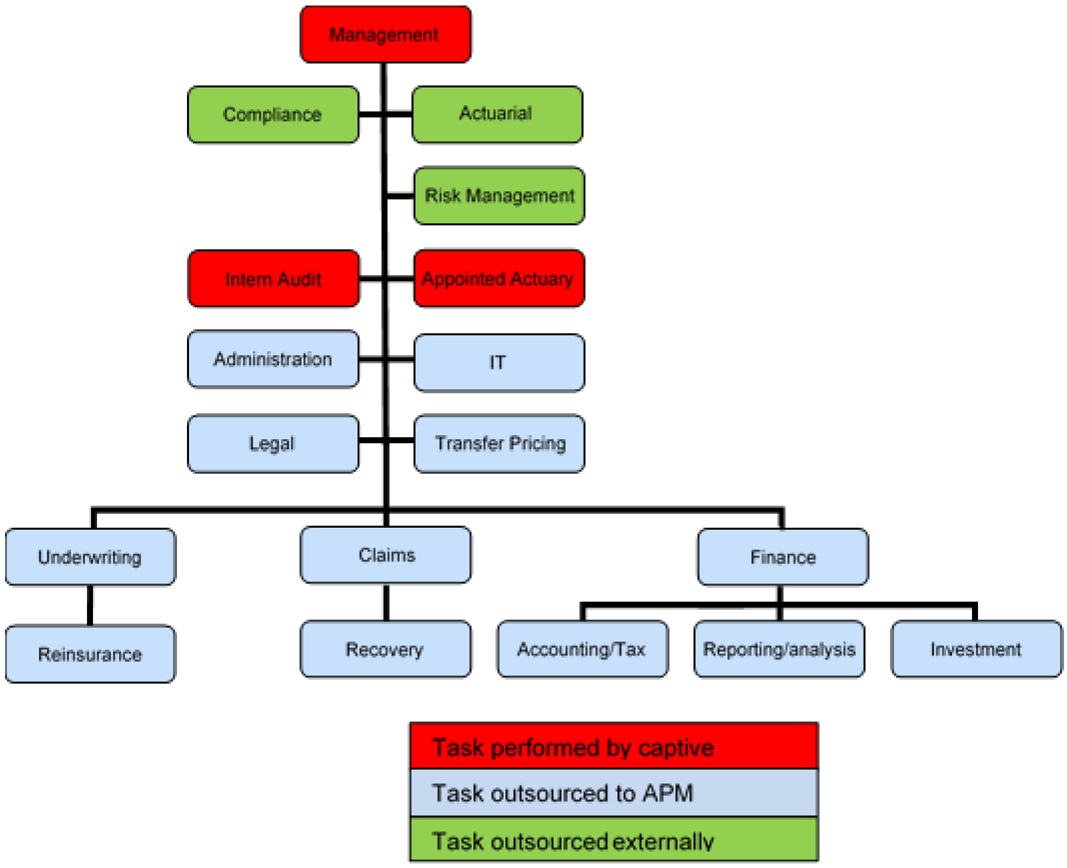
A.5 Any other information

All relevant information for MIAS' business and performance is given in the above sections.

B. Management System

B.1 General Remarks

MIAS has to a large extent outsourced the operation, including Risk Management, Compliance, Actuarial, Underwriting, Reinsurance, Claims handling, Legal, Tax, Accounting, Investment, Reporting, IT, etc.
Underwriting, Reinsurance, Claims handling, Legal, Tax, Accounting, Investment, Reporting and IT are outsourced to the parent company.
Support functions for the Risk Management, Actuarial and Compliance key functions are outsourced to external parties.



As of March 16th 2021, Bengt Niclas Erlandson has taken over the role of chairman of the board, and internal member of the audit committee, from Jan Kjærvik.

MIAS´s management consists of three part-time employees:

- Lars Henneberg (Managing Director), who holds both the Actuarial (Non-Life), Risk Management and the Compliance key functions
- Steen Ragn, Key function for Actuarial (Life) and the appointed actuary
- Dan Otzen, who holds the Internal Audit key function as of April 2021.Dan Otzen, who holds the Internal Audit key function since April 2021 (Peter Hansen held the Internal Audit key function in the first part of 2021)

Lars Henneberg is also Managing Director, and Lars Henneberg, Steen Ragn and Dan Otzen are the only employees of MIAS as all the other functions are outsourced.

Under Lars Hennebergs' guidance and leadership, EY is hired to perform the duties of the compliance, risk management and actuarial function.

B.2 Fitness and Propriety (Fit and Proper)

Legal requirement

FIL § 64 defines the requirements which individual members of the board and the management of financial companies must meet with regard to fit and proper requirements.

Individual requirements for suitability - Fit and Proper assessment

The requirements for Fit & Proper imply that members of the Board and the management must:

- have sufficient knowledge, skills, and experience to carry out the duties in the company
- have a good reputation
- not become subject to criminal liability
- not be in bankruptcy
- not have caused the company a loss or risk of loss

The above requirements must be fulfilled from the time of appointment of the key persons throughout the period of duties.

The managing director and the board of directors are fit and proper.

B.3 Risk management and ORSA

MIAS's Managing Director must keep the Chairman of the Board informed of all issues of significant relevance to MIAS. The following issues must be presented to the Board for approval:

- loan agreements, guarantees, or security which are not part of the usual business
- significant changes in existing agreements with bank connections
- purchase, sale, or mortgaging of the most significant assets of MIAS, including properties or facilities
- making of significant changes in MIAS's structure, including the capital structure or type of business
- significant changes to the operating budgets
- start of significant new activities, including activities within new classes of insurance
- significant changes to the organisation of MIAS, including significant reductions and increases in the number of employees
- entering into settlements in larger trial cases or arbitrations
- entering into or changes to reinsurance agreements
- activities or matters that fall outside the description of MIAS's description of procedures and operational plan
- activities which fall outside the guidelines and policies

The Board follows the "Rules of procedure for the Board" and "Board meeting plan (årshjul)".

Risk Management Function

MIAS requires that the risk management function must:

- assist the Board and other functions in the effective operation of the risk management system
- monitor the risk management system and the general risk profile of MIAS as a whole
- provide detailed reporting on risk exposures and advising the Board on risk management matters, including strategic affairs such as corporate strategy, mergers and acquisitions, major projects, and investments
- report to the Board at least on an annual basis
- identify and assess emerging risks
- ensure the effectiveness of the risk management system according to MIAS's risk appetite and overall risk tolerance limits, as well as manage the main risk management strategies and policies

- establish, implement and maintain a risk management system to be undertaken in the upcoming years when taking into account all activities and the complete system of governance of MIAS
- take a risk-based approach in deciding its priorities
- verify compliance with the decisions taken by the Board of the undertaking on the basis of the recommendations
- co-operate closely with the actuarial function
- provide self-assessment of the function and the processes and implement or monitor needed improvements

A part of the risk management functions duties is to manage MIAS risk register. All risks are governed by a risk owner who is asked to update the assessment of the risk on a frequent basis. The risk owners are also asked to identify new risks.

ORSA

The Risk management function must conduct MIAS's own risk and solvency assessment, ORSA. The ORSA is an integrated part of the business strategy and is taken into account in the strategic decisions of MIAS on an ongoing basis. The ORSA is formally approved by the management at least on an annual basis.

B.4 Internal Control system

Internal controls are carried out by staff responsible for performing operational tasks in MIAS (1st line of defence). Controls are designed to monitor significant risks to MIAS and ensure appropriate assurance that such risks are adequately managed.

Controls are documented and signed off by the person who has performed the control. An independent review of controls is performed by separate staff (4 eyes principle). The Compliance function with support from the Risk management function (2nd line of defence) perform spot checks on selected controls on a quarterly basis to ensure that controls have been carried out as intended and have been documented.

The monthly control overview is discussed with the Managing Director who signs off on the status of control activities. Internal Audit receives a copy of the overview signed by the MD. At every meeting in the Audit Committee, control sheets are reviewed.

The overall assessment of the adequacy and effectiveness of the internal control system is performed by Internal Audit (3rd line of defence).

It is ensured, that 2nd and 3rd line of defence is independent of daily operations.

The Compliance function

MIAS requires that the compliance function must:

- establish, implement and maintain appropriate activities to identify, assess, report on key legal and regulatory obligations
- ensure MIAS monitors and has appropriate policies and controls in respect of key areas of legal and regulatory obligation
- hold regular training on key legal and regulatory obligations
- address compliance shortcomings and violations
- report the compliance plan to the Board of MIAS, including ensuring that adequate disciplinary actions are taken and any necessary reporting to the supervisor or other authorities is made
- issue a compliance report to the MIAS Board based on the results of work carried out including findings and recommendations to the Board
- submit the compliance report to the Board at least on an annual basis
- verify compliance with the decisions taken by the Board on the basis of the recommendations
- conduct regular self-assessments of the compliance function and the compliance processes and implement or monitor needed improvements

B.5 Internal Audit Function

MIAS's Internal Audit function must:

- review the adequacy and effectiveness of the main governance process installed by other governance functions on a regular basis
- ensure a fair exchange of information with other governance functions
- discuss with other governance functions risk categorisation, opinion parameters, reporting tools, materiality metrics, etc. and thus enable all governance functions to speak to the Board using the same language
- use the output from other governance functions to build independent risk-oriented audit plans. Internal Audit must proactively work to enhance effective collaboration, clear responsibilities, and peer acceptance with other governance functions in addition to obtain Board approval of the above-mentioned topics

MIAS requires that the Internal Audit function must:

- establish, implement, and maintain an audit plan disclosing the audit work to be undertaken in the upcoming years when taking all activities and the complete system of governance into account
- take a risk-based approach in deciding its priorities
- report the audit plan to MIAS's Board of Directors of the undertaking
- issue an internal audit report to the Board of Directors based on the result of work carried out in accordance with point (a) including findings, recommendations, the appointed period of time to remedy the shortcomings as well as the persons responsible, and information on the achievement of audit recommendations
- submit the internal audit report to the Board of Directors of the undertaking at least on an annual basis
- verify compliance with the decisions taken by the Board of Directors of the undertaking on the basis of the recommendations
- provide self-assessment

B.6 Actuarial Function

The actuarial function contributes to the effective implementation of the risk management system, particularly with regard to the models that serve as a basis for the calculation of the solvency capital requirement and the minimum capital requirement, cf. Sections 126(c) and 126(d) of FIL, and the company's assessment of own risk and solvency. The actuarial function co-operates with the risk management function and contributes to solving that function's tasks whenever it is relevant. The actuarial function handles all the required technical tasks which fall on the function in accordance with the legislation in force from time to time. For completeness, the activities of the Actuarial Function are outlined in Article 48 of the Solvency II regulation as described below:

1. Insurance and reinsurance undertakings shall provide for an effective actuarial function to:
   a) coordinate the calculation of technical provisions;
   b) ensure the appropriateness of the methodologies and underlying models used as well as the assumptions made in the calculation of technical provisions;
   c) asses the sufficiency and quality of the data used in the calculation of technical provisions;
   d) compare best estimates against experience;
   e) inform the administrative, management or supervisory body of the reliability and adequacy of the calculation of technical provisions;
   f) oversee the calculation of technical provisions in the cases set out in Article 82;
   g) express an opinion on the overall underwriting policy;
   h) express an opinion on the adequacy of reinsurance arrangements; and
2. contribute to the effective implementation of the risk-management system referred to in Article 44, in particular with respect to the risk modelling underlying the calculation of the capital requirements set out in Chapter VI, Sections 4 and 5, and to the assessment referred to in Article 45.The actuarial function shall be carried out by persons who have knowledge of actuarial and financial mathematics, commensurate with the nature, scale and complexity of the risks inherent in the business of the insurance or reinsurance undertaking, and who are able to demonstrate their relevant experience with applicable professional and other standards.

B.7 Outsourcing

Outsourcing important areas of activity are decided by the Board of Directors.

There are regular reports to the Board of Directors to ensure compliance. The Board of Directors assess regularly whether activities are being carried out satisfactorily.

On establishment of the contract, MIAS assess whether the service provider possesses the ability and capacity to carry out the outsourced activities satisfactorily and, in this respect, has the licenses required by the relevant legislation for the specific outsourcing area.

MIAS regularly check that the service provider meets the obligations in the contract. The outsourcing undertaking must monitor whether, in carrying out the outsourced activities, the service provider is complying with the relevant regulations for the area.

If the service provider fails to meet the requirements of the contract and the relevant provisions for the specific outsourcing area, MIAS will take appropriate measures to ensure that the service provider meets these and, if necessary, MIAS itself or through contracting with a new service provider ensures that the requirements of the contract and the relevant provisions for the specific outsourcing area are met within an appropriate time limit given the circumstances.

MIAS ensures adequate insight to ensure that the service provider and the service meet the requirements of the contract and the relevant provisions for the specific outsourcing area.

MIAS has to a large extent outsourced the operation, including Risk Management, Compliance, Actuarial, Underwriting, Reinsurance, Claims handling, Legal, Tax, Accounting, Investment, Reporting, IT, etc.
Underwriting, Reinsurance, Legal, Tax, Accounting, Investment, Reporting and IT are outsourced to the parent company. The Risk Management, Actuarial, Claims handling and Compliance functions are outsourced to external parties.

B.8 Any other information

Remuneration/Salary
The Chairman of the Board of MIAS submits the remuneration policy for the general assembly at the annual general meeting with regard to management's wages.

The Board carries out ongoing monitoring and verification of the wage policy and performs review of the policy at least once yearly.

MIAS has fixed salary and no pension scheme.

C. Risk Profile

MIAS's Board of Directors has identified and evaluated a register of risks. As an addition to the risks described below the top 10 risks and the corresponding mitigation actions are described in Appendix 1.

C.1 Insurance Risks

The risks MIAS insures are analysed and approved by the Board in accordance with the company's concession, strategy, risk appetite, and procedure manual. MIAS estimates the desired and acceptable level of risk, overall and for each sub-category. This assessment is made with respect to the company's capital, and MIAS may choose to take part in the risk under the lead of an external insurance company. MIAS engages in net risk retention throughout and retains up to USD 600 million (gross). Risk appetite and other metrics for maximum exposure are expressed in net terms.

MIAS writes property and casualty risks mainly within the areas Marine, Logistics and Terminals. The company participates in insurance programmes that are in line with the company's risk appetite, subject to approval by the Board of Directors. The risks the parent company wishes to insure through the captive are assessed in terms of the expected premium to the expected damage so only financially feasible risks are insured.

Geographically, the company can take risks worldwide, wherever there is no requirement for local insurance and where the A.P. Moller - Maersk Group's insurable interests are represented. MIAS uses an external insurance company for most risks and local fronting companies where local subscription is required.

Risk appetite

MIAS´s risk appetite is constituted by the maximum possible net exposures undertaken (net of reinsurance cover) and is defined by the Board of Directors as listed below:

Description	Risk Appetite 2021
Hull & Machinery, War	USD 25m per occurence
Property (Terminal, Warehouses)	USD 25m per occurence
Liability (Offices)	USD 25m per occurence
Property (Offices)	USD 25m per occurence
Liability (Umbrella)	USD 25m per occurence
Financial Lines (EPL, PTL, DnO)	USD 25m per occurence
Liability (Terminal, Warehouses)	USD 25m per occurence
Cyber	USD 25m per occurence
Cargo	USD 25m per occurence
Employee Benefit Insurance	USD 25m per occurence
Property & Liability (Containers)	USD 25m per occurence

Net risk retention

MIAS´s current exposure is comprised of the difference between gross retention and the reinsurance or retrocession protection procured and equals the net retention. Thus, the gross retention is mitigated by the use of reinsurance or retrocession. The current exposure is expected to be equal to, or less than, the risk appetite. MIAS´s net retention (net of reinsurance cover) is for the policy period 2021 and 2022.

Description	2021 exposure	2022 exposure
Marine (H&M, War)	USD 19.5 million per occurrence	USD 18.75 million per occurrence
Terminal (PD, BI)	USD 17.5 million per occurrence	USD 25 million per occurrence
Global Property (PD)	USD 17.5 million per occurrence	USD 25 million per occurrence
Global Casualty (TPL)	USD 5.0 million per occurrence	USD 25 million per occurrence
Terminal Operators Liability	USD 5.0 million per occurrence	USD 25 million per occurrence
Maersk Container Industry Liability	USD 0.5 million per occurrence	N/A
Freight Services Liability	USD 5.0 million per occurrence	USD 25 million per occurrence
Maersk Value Protect	USD 0.25 million per occurrence (5 million per occurrence since Juni 2021)	USD 5 million per occurrence
Container Handling Equipment	USD 5.0 million per occurrence	USD 5 million per occurrence
Umbrella Liability	USD 10.0 million per occurrence	USD 25 million per occurrence
Employment Practices Liability	USD 10.0 million per year in the aggregate	USD 10 million per occurrence
Pension Trustee Liability	USD 10.0 million per year in the aggregate	USD 10 million per occurrence
Special Risk	USD 10.0 million per occurrence	USD 5 million per occurrence
Cyber Insurance	USD 10.0 million per occurrence	USD 10 million per occurrence
People lines	USD 5.0 million per occurrence	USD 5 million per occurrence

Running alongside the exposures for 2021 is a structured umbrella reinsurance program with a limit of USD 50 million which is triggered if the net loss to MIAS exceeds USD 30 million per event and USD 150 million in the annual aggregate.

The structured umbrella for 2022 has a limit of USD 40 million which is triggered if the net losses to MIAS exceeds USD 110 million in the annual aggregate. The new reinsurance programme applicable as of January 2022 will include a Treaty reinsurance layer of USD 75 million xs USD 25 million. Facultative reinsurance placements will provide cover excess of USD 100 million. Liability will be covered up to USD 100 million. Property will be covered on a reinsurance basis up to USD 400 million. For Marine, reinsurance will cover up till USD 220 million.

C.2 Market Risks

MIAS is exposed to a selected range of market, counterparty, and credit risks which are summarised in the table below. All risks that MIAS is exposed to are approved by the Board of Directors.

Description	Limit	Actual exposure
Interest rate risk	5 % of total assets on a 100 bp change in the interest rate	Limits are met
Products not allowed for trading	Geared investments, options or other exotic products, premium bonds, mutual funds or other types of pooled investments	Limits are met
Currencies allowed for trading	USD, DKK, EUR, SEK, NOK, CHF, GBP, JPY, AUD and CAD If not USD, the currency risk must be hedged	Limits are met
Other investments	5 % of total assets for corporate bonds, stocks and capital shares	Limits are met

C.3 Credit Risks

MIAS is exposed to a selected range of market, counterparty, and credit risks which are listed in the table below. All risks that MIAS is exposed to are approved by the Board of Directors.

Description	Limit	Actual exposure
Counterparty rating requirements	• Government bonds and mortgage bonds minimum rating of S&P AA or equivalent. Exceptions are Danish or US government bonds • All other investments have a minimum counterparty rating requirement of S&P A- or equivalent • No rating requirement for the parent company A. P. Moller - Maersk A/S • Reinsurers must have a minimum rating S&P A- or similar	In 2021 there are two reinsurance agreements in place with reinsurer´s having a lower rating than A-. These exemptions are approved by MIAS´ board. These two agreements have not been renewed for 2022.
Asset types allowed for trading*	• Loans to parent company A. P. Moller - Maersk A/S • Cash at banks • Bonds or debt instruments issued or guaranteed by governments or regional authorities in Zone A • Bonds traded on regulated markets in countries within the European Union or in the US • Danish mortgage bonds, mortgage covered bonds and covered bonds issued by mortgage banks, financial institutions or ship financing institutions • Corporate bonds listed on a stock exchange in EU / EEA countries • Stocks and capital shares listed on a stock exchange in EU / EEA countries	Limits are met
Concentration risk** maximum per single counterparty	• 15 % of total assets in a single financial institution, except for Danske Bank with 30% of total assets. • Total exposure to a financial counterparty, which operates both banking and mortgage business is limited at 30 % of total assets, of which 15 % to the bank and 15 % to the mortgage business • No limit for Danish or US government issued bonds • Investments directly in A.P. Møller – Mærsk A/S is not included in above mentioned requirements, as long as Danish FSA approves.	Limits are met
Cumulative exposure	• Cash at banks limited to 60 % of total assets • Corporate bonds, stocks and equity accumulated limited 15 % of total assets and each asset type is limited to 10 % of total assets	Limits are met

* Exposure defined as loans, deposits, bonds and shares, and market-to-market of derivatives.

**Concentration risk for the company's risks from excessive reliance on a particular asset class, investment market or a particular investment.

MIAS’ reinsurers are selected in accordance with the following criteria:

- Minimum rating S&P A- or similar
- Good level of capital surplus which also takes into account the potential gross exposures and ratings
- MIAS has a large number of high-quality reinsurers and therefore benefits from diversification

During 2021 MIAS had procured USD 1.807 thousand in reinsurance protection from approximately 42 reinsurers:

	Sum of Risk Proportion	Max of Default Probability	Rating
Construction			
LLOYD'S OF LONDON LTD	58%	0,078%	A+
HDI GLOBAL SPECIALTY SE	19%	0,078%	A+
STARSTONE INSURANCE LTD	14%	0,062%	A-
PARTNER REINSURANCE EUROPE S	9%	0,049%	AA-
EBI			
LLOYD'S OF LONDON LTD	100%	0,078%	A+
Financial Lines			
LLOYD'S OF LONDON LTD	32%	0,078%	A+
CHUBB EUROPEAN GROUP SE	15%	0,000%	AA+
SWISS RE INTERNATIONAL SE	9%	0,000%	AA
GERLING-KONZ GLOB RUCKVERSIC	7%	0,078%	A+
ZURICH INSURANCE PLC	5%	0,000%	AA
ASSICURAZIONI GENERALI	5%	0,078%	A+
ALLIANZ GLOBAL CORPORATE & S	4%	0,000%	AA
XL INSURANCE CO SE	3%	0,049%	AA-
AIG EUROPE SA	3%	0,078%	A+
AMERICAN INTERNATIONAL REINS	3%	0,078%	A+
MARKEL INSURANCE CO	3%	0,078%	A+
HCC INTERNATIONAL INSURANCE	3%	0,078%	A+
ROYAL & SUN ALLIANCE INSURAN	3%	0,052%	A
AXIS SPECIALTY LTD	2%	0,078%	A+
HAMILTON RE LTD	2%	0,062%	A-
H&M			
GARD MARINE & ENERGY INSURAN	32%	0,078%	A+
ASSURANCEFORENINGEN SKULD GJ	14%	0,052%	A
MS FIRST CAPITAL INSURANCE L	14%	0,078%	A+
GREAT AMERICAN INSURANCE CO.	9%	0,049%	AA-
ALANDIA KONSOLIDERING AB	8%	0,062%	A-
BALOISE BELGIUM NV	8%	0,078%	A+
SIAT - SOCIETA' ITALIANA ASS	7%	0,062%	A-
SCOR SE	5%	0,049%	AA-
IRB BRASIL RESSEGUROS SA	4%	0,062%	A-
Liability			
LLOYD'S OF LONDON LTD	66%	0,078%	A+
ZURICH INSURANCE PLC	7%	0,000%	AA
TOKIO MARINE EUROPE SA	4%	0,078%	A+
CHUBB EUROPEAN GROUP SE	4%	0,000%	AA+
MARKEL INSURANCE CO	4%	0,078%	A+
AMERICAN INTERNATIONAL GROUP	3%	0,078%	A+
SI INSURANCE EUROPE SA	3%	0,078%	A+

AIG EUROPE SA	3%	0,078%	A+
HAMILTON RE LTD	2%	0,062%	A-
XL INSURANCE CO SE	2%	0,049%	AA-
CONVEX INSURANCE UK LTD	1%	0,062%	A-
Property			
LLOYD'S OF LONDON LTD	32%	0,078%	A+
XL INSURANCE CO SE	12%	0,049%	AA-
CHUBB EUROPEAN GROUP SE	10%	0,000%	AA+
ZURICH INSURANCE PLC	8%	0,000%	AA
SWISS RE INTERNATIONAL SE	7%	0,000%	AA
POHJOLA VAKUUTUS OY	5%	0,052%	A
GERLING-KONZ GLOB RUCKVERSIC	4%	0,078%	A+
AIG EUROPE SA	4%	0,078%	A+
GREAT LAKES INSURANCE SE	3%	0,000%	AA
IRB BRASIL RESSEGUROS SA	3%	0,062%	A-
EURASIA INSURANCE CO JSC	3%	0,198%	BBB *)
PICC PROPERTY & CASUALTY-A	2%	0,078%	A+
BARENTS RE REINSURANCE CO IN	2%	0,052%	A
STARR INSURANCE & REINSURANC	2%	0,052%	A
NEW INDIA ASSURANCE CO LTD/T	1%	0,148%	BBB+*)
ASPEN INSURANCE UK LTD	1%	0,052%	A
TT CLUB MUTUAL INSURANCE LTD	0%	0,062%	A-
HELVETIA SCHWEIZ VERSICH-R	0%	0,078%	A+
Structured			
HANNOVER RUECK SE	90%	0,000%	AA
SCOR SE	10%	0,049%	AA-
Blended PDTPL			
TT CLUB MUTUAL INSURANCE LTD	100%	0,062%	A-
Energy			
LLOYD'S OF LONDON LTD	63%	0,078%	A+
SI INSURANCE EUROPE SA	38%	0,078%	A+

*) In 2021 there were two reinsurance agreements in place with reinsurer´s having a lower rating than A-. These exemptions were approved by MIAS´ board. These two agreements have not been renewed for 2022.

Reinsurance defaults: the minimum ratings (see above table) imply a low probability of default. There is a risk of systemic default in which the entire insurance market is affected. However, this is a risk that would be difficult to mitigate other than via applying minimum ratings to insurers and reviewing the panel of reinsurers on a regular basis.

C.4 Liquidity Risks

Due to the nature of the business model, the liabilities in MIAS are short termed as they are mainly consisting of claims which are one-time payments. To match the duration of the liabilities, the assets are short termed as well. The loan to the parent company can be withdrawn with 48 hours' notice, and all deposits are of few months' duration. This ensures a balanced liquidity in MIAS where claims can be paid on time even with short notice.

C.5 Operational Risks

The Board has assessed that the following types of events are a part of operational risks:

- losses due to administration errors to the extent they are not covered by the administrator (the supplier in the outsourcing agreement)
- costs resulting from fraud
- costs due to key staff severance
- losses due to the termination of the outsourcing agreement by the system administrator
- losses due to IT downtime, fire damage, etc.

The list is not exhaustive.

The policy for operational risk states that administrative tasks are outsourced to the parent company, which according to the outsourcing agreement is assumed to run administration and IT at a comfortable level.

Economic losses caused by reasons other than insurance events and developments in the financial market are continuously recorded based on booked loss values.

To ensure that management is aware of operational risks in MIAS, they review a quarterly written report containing the following:

- losses in excess of DKK 250.000 (must be recorded and reported)
- events that could have led to a loss of DKK 250.000 (must be recorded and reported)
- assessment of the company's current operational risks and the likelihood that a given event occurs
- description of the risk minimisation measures undertaken to avoid/minimise the recurrence of loss/risk of loss
- other relevant information

A specific operational risk assessment can be found in appendix 1.

C.6 Other material risks

A recent strategic risk consideration has been the viability and future of the MIAS business model in light of the structural changes undertaken by the parent company. MIAS's existing business model rests on the size and diversity of the Group exposure and hence the restructuring initiative, may erode the original business case. As an ultimate consequence, MIAS may be reduced in relevance, potentially to a level of being entirely obsolete.

C.7 Any other information

Fronting

MIAS operates through fronting companies in order to reduce the operational tasks to a desired minimum and to benefit from the operational efficiencies of large global insurance carriers.

The fronting activities consist predominately of policy administration and to some extent underwriting and claims handling.

Outsourcing

MIAS has to a large extent outsourced the operation, including underwriting, reinsurance, claims handling, actuarial services, legal, tax, accounting, investment, reporting, IT, risk management functions, etc.

Underwriting, reinsurance, legal, risk management, tax, accounting, investment, reporting, IT are outsourced to the parent company.

The actuarial function, claims handling, compliance and risk function are outsourced to external parties.

D. Valuation for solvency purpose

D.1 Assets

The table below sets out MIAS's assets under IFRS and Solvency II Bases as of 31 December 2021. The total assets increase from management accounting treatment (USD 395.014 thousand) to Solvency II (USD 395.921 thousand) which reflects the balance sheet treatment under Solvency II.

The main area of difference between the two valuations is in the valuation of the Reinsurers' technical provisions, loan to APMM, deferred tax assets and receivables, as detailed in the table below.

	Management Accounting	**Solvency II**
Receivables	16.674	16.554
Deferred tax assets	-	2.311
Liquid Funds	6.618	6.618
Short term deposits	145.000	145.014
Loan to APMM	152.000	152.106
RI Technical Provisions	59.085	57.681
Claims Provision	*57.710*	*56.338*
Premium Provision	*1.375*	*1.343*
Insurance debtors	15.637	15.637
Total assets	**395.014**	**395.921**

All values are in USD thousands

RI Technical Provisions

The Reinsurers´ technical provisions reduce from accounting treatment (USD 59.085 thousand) to Solvency II (USD 57.681 thousand) due to discounting. The discounting effect amounts to USD 1.404 thousand which is small due to the short-tailed nature of MIAS´ business.

Receivables, short term deposits and loan to APMM

The short-term deposits and the loan to APMM include accrued interest under Solvency II which is included in the Receivables under management accounting. The accrued interest on the short-term deposits amounts to USD 14 thousand and to USD 106 thousand on the loan to APMM.

All other assets

All other assets have been retained as accounting values given their short-term and liquid nature.

D.2 Technical provisions of insurance and reinsurance

The table below sets out the technical provisions (gross of reinsurance) by Solvency II line of business.

Solvency II Class	Marine, Aviation & Transport	Fire & Other Damage to Property	General Liability Insurance	Miscellaneous Financial Loss	Medical expense	Income protection	Life	Total
Claims provision	**75.048**	**34.118**	**11.144**	**1.059**	**6.221**	**4.052**	**826**	**132.468**
Outstanding claims	76.875	34.972	11.345	1.078	6.372	4.151	846	135.639
Discount effect	-1.827	-854	-201	-19	-151	-99	-20	-3.171
Premium Provision	**0**	**223**	**0**	**285**	**2.017**	**17**	**359**	**2.901**
UPR	0	229	0	290	2.066	17	368	2.970
Discount effect	0	-6	0	-5	-49	0	-9	-69

All values are in USD thousands

The technical provisions under Solvency II are valued at Best estimate meaning they are adjusted for the time value of money and run-off patterns using a discounted cash flow valuation and the interest rates provided by EIOPA. The discounting effect is small since MIAS´ liabilities are short-tailed.

In line with Danish regulations the future profits are not considered in the calculation of the premium provisions under Solvency II.

Risk Margin

The risk margin is a function of the SCR and is calculated to be USD 11.056 thousand.
Whilst liabilities under SII are measured at best estimate, these are inherently uncertain, and the risk margin provides a margin to ensure liabilities are valued at fair value. It can also be described as the amount that an undertaking would require above the best estimate liabilities in order to take over and meet the obligations.

This is calculated by determining the cost of providing an amount of capital equal to the SCR necessary to support the obligations over their lifetime.

The calculation involves approximating the SCR for each future year (based on the assumed settlement of claims) and then valuing the risk margin on a discounted cash-flow basis.

A 6 % Cost of Capital rate is assumed to determine the cost of providing the funds as defined in Solvency II.

Areas of uncertainty within the Technical Provisions

Settlement period: The risks being underwritten are mainly short-tailed. Most claims except some general liability claims are settled after 5 years.
Discount rate: Current yields are very low, which means that almost no discounting is applied to the Technical Provisions given the risks underwritten by MIAS are short-tailed.

Claims provision: MIAS's classes of risk are low frequency, high severity and as such MIAS does not have a high volume of claims. MIAS's approach of applying loadings to known claim reserves to allow for adverse development is in line with industry practice. Historically, MIAS has not seen much adverse development so known case reserves are expected to be broadly reasonable. However, there is inherent uncertainty in the claim provisions.

Premium provision: As agreed with the DFSA, MIAS's Solvency II premium provision assumes a 100 % loss ratio, i.e. no advance credit is taken for expected underwriting profits. This is prudent given MIAS's historical experience.

Additional adjustments

MIAS has made no adjustments for matching adjustments, volatility adjustments, transitional measures or transitional deductions within its technical provisions.

Material changes in assumptions

MIAS has followed the same approach to the calculation of technical provisions since 2012 and as such there are no material changes to report.

D.3 Other liabilities

The table below sets out MIAS's liabilities under Management Accounting and Solvency II as of 31 December 2021.

	Management Accounting	**Solvency II**
Gross technical provisions	138.610	135.369
Claims Provision	*135.639*	*132.468*
Premium provision	*2.971*	*2.901*
Risk margin	-	11.056
Payables	3.028	3.028
Reinsurance payables	14.670	4.420
Total liabilities	**156.308**	**153.873**

All values are in USD thousands

Technical provisions

The gross technical provisions decrease from the management accounting treatment (USD 138.610 thousand) to Solvency II (USD 135.369 thousand) due to discounting. The discounting effect amounts to USD 3.241 thousand which is small due to the short-tailed nature of MIAS´ liabilities and the low interest rates.

In addition, the risk margin of USD 11.056 thousand is included in the Solvency II balance sheet to reflect the additional cost of capital that an alternative insurer would be required to hold to take over MIAS's liabilities.

All other liabilities

All other liabilities have been retained as accounting values given their short-term and liquid nature

D.4 Alternative valuation method

The solvency and financial condition report must include information on the areas set out in Article 263 in complying with the disclosure requirements of the insurance or reinsurance undertaking as laid down in paragraphs 1 and 3 of this Article.

D.5 Other information

No other material information regarding the valuation of assets and liabilities for solvency purposes is deemed necessary.

E. Capital Management

E.1 Own funds

The management of own funds is governed by the Policy for Capital Structure where the overall responsibility and tasks are defined. According to this policy, the equity of the company must be sufficient to ensure the continued operation of the company and at the same time sufficient to meet all regulatory requirements. The company is constantly focusing on matters which might influence the capital structure, e.g. the company's investment policy. The value creation of the company is meant to primarily be generated from acceptance of insurance risk rather than by acceptance of investment risk. The time horizon for business planning including development of own funds is minimum 3 years.

Own funds as at the reporting date consists of:

Own funds	**31.12.2021**	**31.12.2020**	**Development**
Ordinary share capital	89.987	89.987	-
Accumulated profit	137.392	121.114	8.180
Total own funds	**227.378**	**211.101**	**8.180**

All values are in USD thousands

where USD 2.311 thousand of the own funds is tier 3 capital and the remaining tier 1. Total own funds as shown above are eligible for meeting the SCR and the total own funds excluding the tier 3 capital are eligible for meeting the MCR.

As of 31 December 2021, the equity according to statutory accounts is USD 224.037 thousand.

The difference between the statutory equity and the own funds under Solvency II is primarily caused by the following:

- Inclusion of deferred tax assets on the Solvency II balance sheet: USD 2.311 thousand
- Discounting of the ceded technical provisions: USD 1.372 thousand
- Discounting of the gross technical provisions: USD 3.171 thousand

E.2 Solvency capital requirement and Minimum Capital Requirement

The Solvency Capital Requirement (SCR) is calculated using the standard formula without simplified calculations and without undertaking specific parameters.

The following tables shows the SCR by risk module, the Capital Available and the resulting Solvency ratio.

	31.12.2021	31.12.2020
Market risk	1.002	74
Counterparty Default risk	30.668	31.029
Non-Life Underwriting risk	71.328	51.481
Health Underwriting Risk	22.915	24.353
Life Underwriting Risk	5.462	5.284
Diversification effects	*-34.760*	*-32.473*
Basic SCR	**96.617**	**79.748**
Operational risk	7.138	4.918
LACDT adjustment	-21.685	-17.695
SCR	**82.070**	**66.971**
Capital available	**227.378**	**211.101**
Solvency ratio	**277%**	**315%**

All monetary values are in USD thousands

The most significant movement from 2020 to 2021 is the increase in Non-Life Underwriting Risk. This is a consequence of MIAS' new reinsurance structure that comes into force as of 1 January 2022, which causes an increase of SCR because of higher net retentions for the Property and Liability programs. The increased net retentions lead in particular to higher man-made catastrophe scenarios, which are part of the non-life underwriting risk module.

The Minimum Capital Requirement (MCR) is calculated using the standard formula without simplified calculations and without undertaking specific parameters

The following table shows the input used to calculate the MCR. The MCR as per 31 December 2021 amounts to USD 20.518 thousand. This corresponds to the MCR floor which is calculated as 25% of the SCR.

	31.12.2021	31.12.2020
Life MCR (based on Premiums)	25	18
Non-Life MCR (based on Premiums and Technical Provisions)	17.025	9.681
MCR Floor (25% of SCR)	20.518	16.743
MCR Cap (45% of SCR)	36.932	30.137
Absolute Minimum (EUR 3.7m)	4.191	4.477
Minimum Capital Requirement	**20.518**	**16.743**

All values in USD thousands

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

The company has not invested in shares and this section is therefore not relevant.

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

The company does not make use of an internal model.

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

The Board of MIAS has decided that the solvency ratio of the company as a minimum target should be 1,50. This target is considered whenever new business opportunities are evaluated and when considering the future strategy of the company.

The actual solvency ratio is calculated by the company's actuarial function on a quarterly basis and additionally in connection with assessing new significant risks. The future estimated solvency ratio is included in the company's budgets which are updated yearly and covers at least a three-year period.

If a recalculation or reassessment of the company's individual solvency requirement shows that the Company's capital plan has changed to the effect that the capital base is less than 1,30 times the capital base (individual solvency requirement) of the Company, Management must inform the Board of Directors immediately. Management must, in coordination with the Chairman of the Board, convene a meeting of the entire Board of Directors as soon as possible and within one week. At this meeting, Management must:

1.1. Identify the material reasons for the increased capital requirement based on the model for determination of the individual solvency requirement, and/or the main reasons for the reduction in the capital base.
1.2. Provide a basis for the Board's assessment of the projected impact of the reduction, its timing and the requisite response time for actions aimed at restoring the Company's capital position to include the excess coverage of 1,5 as intended by Board of Directors.

Serving as basis of decision for the Board of Directors at the meeting, Management has prepared:

1.1. A statement of the individual solvency requirement
1.2. Proposals for measures that may restore excess coverage to the intended level. Proposals for changes to the writing of insurances or the structure of contracts with suppliers must be supplemented with reflections about the impact of limiting the writing of new or extending insurance policies. Furthermore, (additional) reinsurance for the entire or part of the insurance portfolio must be considered. And changes to the Company's investment policy may be included to the extent these may increase excess coverage.
1.3. Analysis of scope for restoring capital position by raising further capital in the form of share capital or other subordinate capital.

Based on such proposal, the Board of Directors will decide on action to be taken to quickly reduce the capital need or raise any requisite additional capital. If the Board of Directors deems that the proposals are not sufficient or that alternatives exist, such additional measures will be implemented.

If the Board of Directors finds that the excess coverage is critically low at 1,25 or below relative to the capital base (individual solvency requirement), Management must immediately inform the Board of Directors and, in coordination with the Chairman of the Board, convene a meeting of the entire Board of Directors as soon as possible. The purpose of the said meeting is to quickly restore the capital position. The Board of Directors will notify the Danish Financial Supervisory Authority about the situation.

Management is under a separate duty to oversee that the Company's excess coverage does not drop below 1,1 in the process. If this is the case, Management must immediately inform the Board of Directors and auditors thereof.

If the Board establishes, in connection or continuation of this event, that the previous efforts do not have the expected effect quickly enough, Management must completely suspend the writing and renewal of insurance policies. Such resolution is to be made by the Board of Directors based on the Board's consideration of the options for rapid capital increases.

The Board of Directors must make such resolution not later than four weeks after the Board meeting at which the capital plan will be adopted.

The MIAS Board of Directors has established the following capital emergency plan:

Solvency Ratio	Action
1,50	The targeted minimum ratio – no action required
1,30	The Board is summoned to decide if the solvency ratio needs to be strengthened immediately
1,25	The Board is summoned and will meet without delay and will based on presentations from Management decide any actions which must be initiated to improve the solvency situation immediately. The Board will notify the Danish Financial Supervisory Authority about the situation
1,10	Renewed notification of the Board, notification to external auditors and suspension of writing any new insurance policies

E.6 Any other information

There is no other information in relation to capital management which is relevant to disclose.

F. Appendix

F.1 2021 Q4 Top 10 risks

Risk type	Description	Probability & Impact	Triggers	Vulnerabilities	Consequence	Exisiting mitigation
Underwriting	Fair representation of the risk: In case retrocession insurers are not given a fair representation of the risk it may lead to retrocession insurers declining cover on the basis that the risk was different or greater than what they had assessed	1-5 % 30-50 mUSD	• MIAS underwriting team not providing the correct and important information about the risks to be reinsured	• Change in retrocession structure leading to change in required risk information MIAS underwriting team not fully understanding the business risks • MIAS reinsuring the gross risk • UK Insurance Act implications on not adhering to the information obligations on the insured	• Negative financial result for MIAS • Revised SCR calculation adversely affects solvency margin targets (140%-110%) potentially leading to additional capital funding requirements	• MIAS underwriting team close interaction with the risk advisors and the business • Retrocession broker advising on need for disclosure of important information • Process for representation of risk at renewal (consistent format for underwriting submission designed)
Underwriting	Back-to-back-retrocession: Back-to-back Cover provided under the fronted policies issued to Maersk entities and reinsured to MIAS but not ceded to MIAS retrocession insurers	1-5 % 30-50 mUSD	• Retrocession program not back to back with cover provided under fronted polices	• Change in retrocession structure implying a new type of reinsurance wording •MIAS reinsuring the gross risk • Local policies issued not mirroring the Master policy	• Retrocession cover not responding leading to MIAS exposed to pay claims in excess of their retained risk • Negative financial results of MIAS • Revised SCR calculation adversely affects solvency margin targets leading to additional capital funding requirements	• Legal back to back review of master polices, reinsurance agreements and retrocession slips (SOP on back to back review) • Retrocession policies issued as follow form • Review of local policies for consistency, master policies (FINC Clause, DIC/DIL, Insureds Clauses, limits, coverage) (SOP on local policy issuance) •Through review of fronting policies ensure tie-in (interlocking) limits are included when multiple policies issued under same master policy

Finance	Parent company bankrupt A prolonged downturn in the market or inability to deliver a superior/consistent service level to APMM's customers could lead to bankruptcy of APMM	< 1 % > 50 mUSD	• Failure to operate APMM profitably eroding equity	• Financial loss to MIAS • MIAS' sole purpose is to operate as a captive to APMM wherefore all business would be lost • MIAS is taking larger risks than it would on a standalone basis as the risk appetite is partly defined by APMM • The MIAS capital emergency plan is partly dependent on APMM	• Default on MIAS' loan to parent • MIAS put in run-off	• Rating of parent company • Proximity to Group Finance facilitates a close dialogue
Finance	Bank bankrupt MIAS is placing substantial amounts of deposits with a number of banks. According to the investment policy, deposits with one bank can maximum be 15% of total financial assets except for Danske Bank where limit is 30%.	< 1 % > 50 mUSD	• Systemic loss causing the default of MIAS main deposit bank	• Financial loss to MIAS of up to 30% of total financial assets.	• Loss of MIAS deposits • Negative financial result for MIAS • Solvency issues • Requirement for additional capital	• List of allowed counterparts is maintained • Investment policy restricts how large a share of total financial assets which can be placed in deposits • Investment policy limits how large a share of total financial assets can be placed with a bank • Investment policy specifies rating requirement of banks • Monitoring of adherence to limits in investment policy
Underwriting	Catastrophe losses: An event which impacts MIAS on several lines of insurance, potentially multiple times on same line of insurance	1-5 % 10-30 mUSD	• Catastrophic risk due to terror, war, pandemic, or natural catastrophe etc.	• Failure to understand the potential catastrophe exposures that MIAS is exposed to • Failure to recognize and manage the potential financial impact of catastrophe losses • Failure to understand exposure to sideways (aggregate) losses	• Negative financial result for MIAS • Revised SCR calculation adversely affects solvency margin targets (140%-110%) potentially leading to additional capital funding requirements	• Stop loss insurance in place • Risk treated in-depth in ORSA-process • Separate "Black Swan"-analysis (stress test of major loss scenarios) completed • Quarterly risk management reports including large losses and reinsurance • Reinsurance purchased such that retained exposure remains within risk appetite Planned mitigation: Strategic review of capital and reinsurance structure including review of possibility to remove the sideways exposure

Underwriting	Credit risk on reinsurance (rating changes)	1-5 % 10-30 mUSD	• Reinsurer defaulting	• Failure to establish and maintain reinsurance in accordance with the risk appetite and solvency requirement • Failure to comply with MIAS' reinsurance policy, including counter-party rating changes	• Unacceptable counter-party exposures are allowed to develop • Revised SCR calculation adversely affects solvency margin targets leading to additional capital funding requirements • Delayed payment or non-payment of claims	• Reinsurance Policy approved by the board • MIAS Reinsurance Policy is reviewed at least once a year • Overview of all reinsurers is kept in MIAS and credit ratings of all reinsurers are checked on a bi-weekly basis • If a rating of a reinsurer is below the rating set in the MIAS Reinsurance policy, the board is informed and asked for approval to continue if that is considered the best solution by MIAS Mgt,if not the reinsurer is sought replaced vi the broker
Claims	Failure to recover from retrocession insurance: Failure to obtain proper recovery from retrocession insurers due to late reporting or inadequate reporting to retrocession or completely miss to report	1-5 % 10-30 mUSD	• Failure to report to Retro, • Late reporting to the Retro • Lack of understanding of the retro insurance in place due insufficient documentation in the system,	• Lack of (clear) ownership • Lack of necessary resources • Lack of IT capabilities • Incomplete processes	• Negative financial result for MIAS • Solvency issues and additional capital funding requirements • Reputational damage to MIAS and the wider APMM Group	• Use Insurwave, Finance competence and monthly control with assistance of Finance • H drive documentation • Use same insurers at the front as Lead retro • Have regular contact with brokers • Training of colleagues
Finance	Increased volatility from new reinsurance structure Retentions for main programs are expected to increase to USD 25m per event which will lead to increased volatitily in results	1-5 % 10-30 mUSD	• Several large claims events	• Claims will exceed premium income and exhaust the Aggregate Excess of Loss policy which will lead to financial loss in MIAS. The Aggregate Excess of Loss policy has a deductible of USD 115m which equals the MIAS 2022 net premium and has a limit of USD 40m. The limit is forecasted to be exhausted in 1 in 50 years.	• Negative result in MIAS • Lower SCR ratio • Higher future premium to business	• Currently high SCR ratio • Carry forward mechanism allowing MIAS to increase future premiums in case of large losses • Treaty structure will cap maximum loss per event across all lines of business (except Cyber) • Currently high SCR ratio • Carry forward mechanism allowing MIAS to increase future premiums in case of large losses • Aggregate Excess of loss policy, USD 40m xs USD 115m

Management	Mix of risk accepted: Incident triggers multiple losses across a concentrated and positively correlated portfolio of risk accepted leading to losses beyond the risk appetite	1-5 % 10-30 mUSD	• Systemic risks triggering multiple sideways losses across positively correlated policies with highly concentrated exposures • Lack of reinsurance • Inadequate or insufficient reinsurance response • Unexpected high number of individual occurrences across risk accepted	• High level of retentions on individual risks (line of business) • High level of concentration and positive correlated risk with limited diversification effect • Concentration risk increasing with inclusion of new lines of insurance such as container handling equipment, medical and life insurance for employees and eventually cargo insurance • Complex and insufficiently calibrated reinsurance structure leaves holes in protection against sideways losses • Incomplete understanding of how reinsurance structure works • Current reinsurance structure biased towards facultative reinsurance	• Negative financial result for MIAS • Higher capital requirement (SCR) • Need for recapitalization of MIAS	• Performance and financial stability is evaluated and reported monthly • Risk exposures are discussed at board meetings whenever there are proposed/new exposures • Mix of risks accepted is approved by the board and subsequently adhered to and controlled (ORSA) • Implementation of new operating model to recreate diversification in MIAS risk profile and improve possibility for recovery of losses from business • Lowering attachment point of Stop Loss/Umbrella insurance per occurrence and in the yearly aggregate • Actuary function and risk management function assessing adequacy of underwriting policy, reserves and reinsurance program on a continuous basis
Management	Lack of critical mass: In order keep pace with increasing regulatory requirements MIAS needs to step up resources to a level which is disproportionate with the value creation in MIAS	1-5 % 10-30 mUSD	• Increasing regulatory requirements, • poor DFSA inspection result, • increased capital requirement, • increasing fit & proper requirements	• Lean staffing of MIAS, • current capabilities stretched to their limit, • lack of succession planning, • lack of internal pipeline, • need for highly specialized resources, • potentially blurred value creation under New Operating Model	• MIAS' costs increases as a result of increasing requirements, • MIAS buckles to increasing requirements and closes down	• Outsourcing, • effective and practical organization of tasks, • hard working staff, • effective cost management

F.2 QRTs

S.02.01 **SolvencyTool**
Balance sheet **Thousand USD**

ARS: Annual Solvency II reporting Solo 08-04-2022 (Published)
MIAS 2021 Annual USD - (1)

Assets		Solvency II value
		C0010
Goodwill	R0010	
Deferred acquisition costs	R0020	
Intangible assets	R0030	0
Deferred tax assets	R0040	2.311
Pension benefit surplus	R0050	0
Property, plant & equipement held for own use	R0060	0
Investments (other than assets held for index-linked and unit-linked funds)	R0070	145.014
Property (other than for own use)	R0080	0
Participations	R0090	0
Equities	R0100	0
Equities - listed	R0110	0
Equities - unlisted	R0120	0
Bonds	R0130	0
Government Bonds	R0140	0
Corporate Bonds	R0150	0
Structured notes	R0160	0
Collateralised securities	R0170	0
Investment funds	R0180	0
Derivatives	R0190	0
Deposits other than cash equivalents	R0200	145.014
Other investments	R0210	0
Assets held for index-linked and unit-linked funds	R0220	0
Loans & mortgages	R0230	152.106
Loans on policies	R0240	0
Loans & mortgages to individuals	R0250	0
Other loans & mortgages	R0260	152.106
Reinsurance recoverables from:	R0270	57.681
Non-life and health similar to non-life	R0280	57.681
Non-life excluding health	R0290	57.681
Health similar to non-life	R0300	0
Life and health similar to life, excluding health and indexlinked	R0310	0
Health similar to life	R0320	0
Life excluding health and index-linked and unit-linked	R0330	0
Life index-linked and unit-linked	R0340	0
Deposits to cedants	R0350	0
Insurance & intermediaries receivables	R0360	15.637
Reinsurance receivables	R0370	0
Receivables (trade, not insurance)	R0380	0
Own shares	R0390	0
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	0
Cash and cash equivalents	R0410	6.618

Any other assets, not elsewhere shown	R0420	16.554
Total assets	R0500	**395.921**
Liabilities		Solvency II value
Technical provisions – non-life	R0510	145.071
Technical provisions – non-life (excluding health)	R0520	131.013
TP calculated as a whole	R0530	0
Best Estimate	R0540	121.877
Risk margin	R0550	9.136
Technical provisions - health (similar to non-life)	R0560	14.058
TP calculated as a whole	R0570	0
Best Estimate	R0580	12.306
Risk margin	R0590	1.751
Technical provisions - life (excluding index-linked and unitlinked)	R0600	1.354
Technical provisions - health (similar to life)	R0610	0
TP calculated as a whole	R0620	0
Best Estimate	R0630	0
Risk margin	R0640	0
Technical provisions – life (excluding health and indexlinked and unit-linked)	R0650	1.354
TP calculated as a whole	R0660	0
Best Estimate	R0670	1.185
Risk margin	R0680	169
Technical provisions – index-linked and unit-linked	R0690	0
TP calculated as a whole	R0700	0
Best Estimate	R0710	0
Risk margin	R0720	0
Other technical provisions	R0730	
Contingent liabilities	R0740	0
Provisions other than technical provisions	R0750	0
Pension benefit obligations	R0760	0
Deposits from reinsurers	R0770	0
Deferred tax liabilities	R0780	0
Derivatives	R0790	0
Debts owed to credit institutions	R0800	0
Financial liabilities other than debts owed to credit institutions	R0810	0
Insurance & intermediaries payables	R0820	0
Reinsurance payables	R0830	14.670
Payables (trade, not insurance)	R0840	0
Subordinated liabilities	R0850	0
Subordinated liabilities not in BOF	R0860	0
Subordinated liabilities in BOF	R0870	0
Any other liabilities, not elsewhere shown	R0880	7.448
Total liabilities	R0900	**168.543**
Excess of assets over liabilities		Solvency II value
Excess of assets over liabilities	R1000	**227.378**

S.05.01 **SolvencyTool**

Premiums, claims and expenses by line of business **Thousand USD**

ARS: Annual Solvency II reporting Solo 08-04-2022 (Published) MIAS 2021 Annual USD - (1)

Non-life		Total
		C0200
Premiums written		
Gross - Direct Business	R0110	18.184
Gross - Proportional reinsurance accepted	R0120	120.751
Gross - Non-proportional reinsurance accepted	R0130	0
Reinsurers' share	R0140	53.579
Net	R0200	85.356
Premiums earned		
Gross - Direct Business	R0210	18.048
Gross - Proportional reinsurance accepted	R0220	120.745
Gross - Non-proportional reinsurance accepted	R0230	0
Reinsurers' share	R0240	52.204
Net	R0300	86.589
Claims incurred		
Gross - Direct Business	R0310	-3.966
Gross - Proportional reinsurance accepted	R0320	79.851
Gross - Non-proportional reinsurance accepted	R0330	0
Reinsurers' share	R0340	13.346
Net	R0400	62.539
Changes in other technical provisions		
Gross - Direct Business	R0410	0
Gross - Proportional reinsurance accepted	R0420	0
Gross - Non-proportional reinsurance accepted	R0430	0
Reinsurers' share	R0440	0
Net	R0500	0
Expenses incurred	R0550	4.680
Administrative expenses		
Gross - Direct Business	R0610	559
Gross - Proportional reinsurance accepted	R0620	4.108
Gross - Non-proportional reinsurance accepted	R0630	0
Reinsurers' share	R0640	0
Net	R0700	4.668
Investment management expenses		
Gross - Direct Business	R0710	0
Gross - Proportional reinsurance accepted	R0720	13
Gross - Non-proportional reinsurance accepted	R0730	0
Reinsurers' share	R0740	0
Net	R0800	13
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
Acquisition expenses		
Gross - Direct Business	R0910	0
Gross - Proportional reinsurance accepted	R0920	0
Gross - Non-proportional reinsurance accepted	R0930	0
Reinsurers' share	R0940	0
Net	R1000	0
Overhead expenses		
Gross - Direct Business	R1010	0
Gross - Proportional reinsurance accepted	R1020	0
Gross - Non-proportional reinsurance accepted	R1030	0
Reinsurers' share	R1040	0
Net	R1100	0
Other expenses	R1200	0
Total expenses	R1300	4.680

S.05.02
Premiums, claims and expenses by country

SolvencyTool
Thousand USD

ARS: Annual Solvency II reporting Solo 08-04-2022 (Published) MIAS 2021 Annual USD - (1)

Non-life		Home country	Top 5 countries (by amount of gross premiums written)				Total
			FR	GB	LU	NO	
		C0080	C0090	C0090	C0090	C0090	C0140
Premiums written							
Gross - Direct Business	R0110	18.184	0	0	0	0	18.184
Gross - Proportional reinsurance accepted	R0120	5.169	7.055	40.591	6.207	61.729	120.751
Gross - Non-proportional reinsurance accepted	R0130	0	0	0	0	0	0
Reinsurers' share	R0140	0	156	25.538	137	27.748	53.579
Net	R0200	23.353	6.900	15.053	6.069	33.981	85.356
Premiums earned							
Gross - Direct Business	R0210	18.048	0	0	0	0	18.048
Gross - Proportional reinsurance accepted	R0220	5.169	7.030	40.633	6.184	61.729	120.745
Gross - Non-proportional reinsurance accepted	R0230	0	0	0	0	0	0
Reinsurers' share	R0240	0	156	24.163	137	27.748	52.204
Net	R0300	23.217	6.874	16.470	6.047	33.981	86.589
Claims incurred							
Gross - Direct Business	R0310	-3.966	0	0	0	0	-3.966
Gross - Proportional reinsurance accepted	R0320	5.763	6.581	34.832	5.790	26.885	79.851
Gross - Non-proportional reinsurance accepted	R0330	0	0	0	0	0	0
Reinsurers' share	R0340	0	0	7.774	0	5.572	13.346
Net	R0400	1.797	6.581	27.058	5.790	21.313	62.539
Changes in other technical provisions							
Gross - Direct Business	R0410	0	0	0	0	0	0
Gross - Proportional reinsurance accepted	R0420	0	0	0	0	0	0
Gross - Non-proportional reinsurance accepted	R0430	0	0	0	0	0	0
Reinsurers' share	R0440	0	0	0	0	0	0
Net	R0500	0	0	0	0	0	0
Expenses incurred	R0550	1.265	355	897	312	1.851	4.680
Other expenses	R1200						0
Total expenses	R1300						4.680

Life		Home country	Top 5 countries (by amount of gross premiums written)		Total
			FR	LU	
		C0220	C0230	C0230	C0280
Premiums written					
Gross	R1410	0	1.314	1.155	2.469
Reinsurers' share	R1420	0	0	0	0
Net	R1500	0	1.314	1.155	2.469
Premiums earned					

Gross	R1510	0	1.192	1.049	2.241
Reinsurers' share	R1520	0	0	0	0
Net	R1600	0	1.192	1.049	2.241
Claims incurred					
Gross	R1610	0	918	808	1.726
Reinsurers' share	R1620	0	0	0	0
Net	R1700	0	918	808	1.726
Changes in other technical provisions					
Gross	R1710	0	0	0	0
Reinsurers' share	R1720	0	0	0	0
Net	R1800	0	0	0	0
Expenses incurred	R1900	0	85	75	160
Other expenses	R2500				0
Total expenses	R2600				160

S.17.01

Non-Life Technical Provisions

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		Direct business and accepted proportional reinsurance						Total
		Medical expense insurance	Income protection insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Miscel-laneous financial loss	
		C0020	C0030	C0070	C0080	C0090	C0130	C0180
TP calculated as a whole	R0010	0	0	0	0	0	0	0
Direct business	R0020	0	0	0	0	0	0	0
Accepted proportional reinsurance business	R0030	0	0	0	0	0	0	0
Accepted non-proportional reinsurance	R0040							0
Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default	R0050	0	0	0	0	0	0	0
Technical provisions calculated as a sum of BE and RM (Non-Replicable portfolio)								
Best Estimate								
Premium provisions								
Gross - Total	R0060	2.017	17	0	223	0	285	2.542
Gross - Direct Business	R0070	0	0	0	0	0	222	222
Gross - accepted proportional reinsurance business	R0080	2.017	17	0	223	0	63	2.320
Gross - accepted non-proportional reinsurance business	R0090							0
Total recoverables from reinsurance and SPV before the adjustment for expected losses due to counterparty default	R0100	0	0	1.343	0	0	0	1.343
Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses	R0110	0	0	1.343	0	0	0	1.343
Recoverables from SPV before adjustment for expected losses	R0120	0	0	0	0	0	0	0
Recoverables from Finite Reinsurance before adjustment for expected losses	R0130	0	0	0	0	0	0	0
Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default	R0140	0	0	1.343	0	0	0	1.343
Net Best Estimate of Premium Provisions	R0150	2.017	17	-1.343	223	0	285	1.198
Claim provisions								
Gross - Total	R0160	6.221	4.052	75.048	34.118	11.144	1.059	131.642
Gross - Direct Business	R0170	0	0	0	455	1.245	7	1.707
Gross - accepted proportional reinsurance business	R0180	6.221	4.052	75.048	33.663	9.899	1.052	129.935
Gross - accepted non-proportional reinsurance business	R0190							0
Total recoverables from reinsurance and SPV before the adjustment for expected losses due to counterparty default	R0200	0	0	47.678	7.913	747	0	56.338
Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses	R0210	0	0	47.678	7.913	747	0	56.338
Recoverables from SPV before adjustment for expected losses	R0220	0	0	0	0	0	0	0
Recoverables from Finite Reinsurance before adjustment for expected losses	R0230	0	0	0	0	0	0	0

Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default	R0240	0	0	47.678	7.913	747	0	56.338
Net Best Estimate of Claims Provisions	R0250	6.221	4.052	27.371	26.205	10.396	1.059	75.304
Total Best estimate - gross	R0260	8.237	4.069	75.048	34.341	11.144	1.344	134.184
Total Best estimate - net	R0270	8.237	4.069	26.027	26.429	10.396	1.344	76.502
Risk margin	R0280	1.172	579	3.704	3.761	1.479	191	10.887
Amount of the transitional on Technical Provisions								
TP calculated as a whole	R0290	0	0	0	0	0	0	0
Best Estimate	R0300	0	0	0	0	0	0	0
Risk margin	R0310	0	0	0	0	0	0	0
Technical provisions - total								
Technical provisions - total	R0320	9.410	4.648	78.752	38.103	12.623	1.535	145.071
Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default	R0330	0	0	49.021	7.913	747	0	57.681
Technical provisions minus recoverables from reinsurance and SPV - total	R0340	9.410	4.648	29.732	30.190	11.876	1.535	87.390
Line of Business: further segmentation (Homogeneous Risk Groups)								
Premium provisions - Total number of homogeneous risk groups	R0350	0	0	0	0	0	0	
Claims provisions - Total number of homogeneous risk groups	R0360	0	0	0	0	0	0	
Cash-flows of the Best estimate of Premium Provisions (Gross) **Cash out-flows**								
Future benefits and claims	R0370	0	0	0	0	0	0	0
Future expenses and other cash out-flows	R0380	0	0	0	0	0	0	0
Cash in-flows								
Future premiums	R0390	0	0	0	0	0	0	0
Other cash-in flows (incl. Recoverable from salvages and subrogations)	R0400	0	0	0	0	0	0	0
Cash-flows of the Best estimate of Claims Provisions (Gross) **Cash out-flows**								
Future benefits and claims	R0410	0	0	0	0	0	0	0
Future expenses and other cash out-flows	R0420	0	0	0	0	0	0	0
Cash in-flows								
Future premiums	R0430	0	0	0	0	0	0	0
Other cash-in flows (incl. Recoverable from salvages and subrogations)	R0440	0	0	0	0	0	0	0
Percentage of gross Best Estimate calculated using approximations	R0450							
Best estimate subject to transitional of the interest rate	R0460	0	0	0	0	0	0	0
Technical provisions without transitional on interest rate	R0470	0	0	0	0	0	0	0
Best estimate subject to volatility adjustment	R0480	0	0	0	0	0	0	0
Technical provisions without volatility adjustment and without others transitional measures	R0490	0	0	0	0	0	0	0

S.19.01
Non-life insurance claims

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Line of business	1:All Lines of Business
Accident year / Underwriting year	1: Accident year
Currency	USD

Gross Claims Paid (non-cumulative)

Year	Development year 0	1	2	3	4	5	6	7	8	9	In current year	Sum of years (cumulative)
Prior											0	0
N-9	1.186	4.206	5.777	2.051	2.963	582	-443	176	155	0	0	16.652
N-8	30.397	4.326	2.807	2.874	-301	-868	44	49	635		635	39.962
N-7	2.764	6.773	7.193	403	14	27	9	261			261	17.445
N-6	4.546	13.356	4.312	5.505	3.929	251	2.361				2.361	34.261
N-5	3.849	21.046	3.825	116	1.742	-500					-500	30.078
N-4	621	3.181	1.996	932	436						436	7.166
N-3	27.828	57.353	3.874	10.370							10.370	99.425
N-2	163	1.081	4.309								4.309	5.553
N-1	7.611	31.768									31.768	39.379
N	19.754										19.754	19.754
Total											**69.392**	**309.674**

Gross undiscounted Best Estimate Claims Provisions

Year	Development year 0	1	2	3	4	5	6	7	8	9	Year end (discounted data)
Prior											0
N-14	0	0	0	0	0	0	0	0	0	0	0
N-13	0	0	0	0	0	0	0	0	0	0	0
N-12	0	0	0	0	0	0	0	0	0	0	0
N-11	0	0	0	0	0	0	0	0	0	0	0
N-10	0	0	0	0	0	0	0	0	0	0	0
N-9	29.579	13.621	7.741	6.473	3.198	976	813	345	10	1	1
N-8	13.544	12.738	8.175	4.750	3.613	1.936	1.629	1.423	123		120
N-7	26.059	11.317	3.529	3.163	3.004	2.899	2.809	688			677
N-6	43.845	29.334	21.119	14.464	7.240	6.115	3.985				3.890
N-5	14.782	8.203	5.187	2.442	1.288	632					616
N-4	15.413	14.105	12.552	11.323	10.867						10.606
N-3	68.796	17.052	15.090	6.803							6.623
N-2	14.163	10.843	7.733								7.579
N-1	79.409	41.513									40.538
N	62.458										60.992
Total											**131.642**

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Basic own funds		Total	Tier 1 — unrestricted	Tier 1 — restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Ordinary share capital (gross of own shares)	R0010	89.987	89.987		0	
Share premium account related to ordinary share capital	R0030	0	0		0	
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040	0	0		0	
Subordinated mutual member accounts	R0050	0		0	0	0
Surplus funds	R0070	0	0			
Preference shares	R0090	0		0	0	0
Share premium account related to preference shares	R0110	0		0	0	0
Reconciliation reserve	R0130	135.081	135.081			
Subordinated liabilities	R0140	0		0	0	0
An amount equal to the value of net deferred tax assets	R0160	2.311				2.311
Other items approved by supervisory authority as basic own funds not specified above	R0180	0	0	0	0	0

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	0

Deductions		Total	Tier 1 — unrestricted	Tier 1 — restricted	Tier 2	Tier 3
Deductions for participations in financial and credit institutions	R0230	0	0	0	0	0

Total basic own funds after deductions		Total	Tier 1 — unrestricted	Tier 1 — restricted	Tier 2	Tier 3
Total basic own funds after deductions	R0290	227.378	225.067	0	0	2.311

Ancillary own funds		Total	Tier 1 — unrestricted	Tier 1 — restricted	Tier 2	Tier 3
Unpaid and uncalled ordinary share capital callable on demand	R0300	0			0	
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310	0			0	
Unpaid and uncalled preference shares callable on demand	R0320	0			0	0
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330	0			0	0
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340	0			0	
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350	0			0	0
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360	0			0	

Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370	0			0	0
Other ancillary own funds	R0390	0			0	0
Total ancillary own funds	R0400	0			0	0
Total available own funds to meet the SCR	R0500	227.378	225.067	0	0	2.311
Total available own funds to meet the MCR	R0510	225.067	225.067	0	0	
Total eligible own funds to meet the SCR	R0540	227.378	225.067	0	0	2.311
Total eligible own funds to meet the MCR	R0550	225.067	225.067	0	0	
Solvency Capital Requirement	R0580	82.070				
Minimum capital requirement	R0600	20.518				
Ratio of Eligible own funds to SCR	R0620	277,054%				
Ratio of Eligible own funds to MCR	R0640	1.096,951%				

Reconciliation reserve		Total
		C0060
Excess of assets over liabilities	R0700	227.378
Own shares (held directly and indirectly)	R0710	0
Foreseeable dividends, distributions and charges	R0720	0
Other basic own fund items	R0730	92.298
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	0
Reconciliation reserve	R0760	135.081
Expected profits included in future premiums (EPIFP) - Life business	R0770	0
Expected profits included in future premiums (EPIFP) - Non-life business	R0780	0
Total Expected profits included in future premiums (EPIFP)	R0790	0

S.25.01

Solvency Capital Requirement - for undertakings on Standard Formula

SolvencyTool
Thousand USD

ARS: Annual Solvency II reporting Solo 08-04-2022 (Published) MIAS 2021 Annual USD - (1)

Article 112	Z0010	2: Regular reporting		
Solvency Capital Requirement calculated using standard formula		Net solvency capital requirement	Gross solvency capital requirement	Allocation from adjustments due to RFF and Matching adjustments portfolios
		C0030	C0040	C0050
Market risk	R0010	1.002	1.002	0
Counterparty default risk	R0020	30.668	30.668	0
Life underwriting risk	R0030	5.462	5.462	0
Health underwriting risk	R0040	22.915	22.915	0
Non-life underwriting risk	R0050	71.328	71.328	0
Diversification	R0060	-34.760	-34.760	
Intangible asset risk	R0070	0	0	
Basic Solvency Capital Requirement	R0100	96.617	96.617	

Calculation of Solvency Capital Requirement		C0100
Adjustment due to RFF/MAP nSCR aggregation	R0120	0
Operational risk	R0130	7.138
Loss-absorbing capacity of technical provisions	R0140	0
Loss-absorbing capacity of deferred taxes	R0150	-21.685
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC (transitional)	R0160	0
Solvency capital requirement, excluding capital add-on	R0200	82.070
Capital add-ons already set	R0210	0
Solvency Capital Requirement	R0220	82.070
Other information on SCR		
Capital requirement for duration-based equity risk sub-module	R0400	0
Total amount of Notional Solvency Capital Requirements for remaining part	R0410	0
Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420	0
Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	R0430	0
Diversification effects due to RFF nSCR aggregation for article 304	R0440	0
Method used to calculate the adjustment due to RFF/MAP nSCR aggregation	R0450	4: No adjustment
Net future discretionary benefits	R0460	0

		C0109		
Approach based on average tax rate	R0590	2: No		
Calculation of loss absorbing capacity of deferred taxes		Before the shock	After the shock	LAC DT
		C0110	C0120	C0130
DTA	R0600	2.311	0	
DTA carry forward	R0610	2.311	0	
DTA due to deductible temporary differences	R0620	0	0	
DTL	R0630	0	0	
LAC DT	R0640			-21.685

LAC DT justified by reversion of deferred tax liabilities	R0650			-21.685
LAC DT justified by reference to probable future taxable profit	R0660			0
LAC DT justified by carry back, current year	R0670			0
LAC DT justified by carry back, future years	R0680			0
Maximum LAC DT	R0690			0

S.28.01

Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity

SolvencyTool
Thousand USD

ARS: Annual Solvency II reporting Solo 08-04-2022 (Published) MIAS 2021 Annual USD - (1)

Linear formula component for non-life insurance and reinsurance obligations		MCR components	
		C0010	
MCR Non-Life Result	R0010	17.025	

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
		C0020	C0030
Medical expense insurance	R0020	8.237	8.299
Income protection insurance	R0030	4.069	5.713
Workers' compensation insurance	R0040	0	0
Motor vehicle liability insurance	R0050	0	0
Other motor insurance	R0060	0	0
Marine, aviation and transport insurance	R0070	26.027	33.953
Fire and other damage to property insurance	R0080	26.429	11.960
General liability insurance	R0090	10.396	23.470
Credit and suretyship insurance	R0100	0	0
Legal expenses insurance	R0110	0	0
Assistance	R0120	0	0
Miscellaneous financial loss	R0130	1.344	153
Non-proportional health reinsurance	R0140	0	0
Non-proportional casualty reinsurance	R0150	0	0
Non-proportional marine, aviation and transport reinsurance	R0160	0	0
Non-proportional property reinsurance	R0170	0	0

Linear formula component for life insurance and reinsurance obligations		MCR components	
		C0040	
MCR Life Result	R0200	25	

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
		C0050	C0060
Obligations with profit participation - guaranteed benefits	R0210	0	
Obligations with profit participation - future discretionary benefits	R0220	0	
Index-linked and unit-linked insurance obligations	R0230	0	
Other life (re)insurance and health obligations	R0240	1.185	
Capital at risk for all life (re)insurance obligations	R0250		0

Overall MCR calculation		MCR components	
		C0070	
Linear MCR	R0300	17.050	
SCR	R0310	82.070	

MCR cap	R0320	36.932	
MCR floor	R0330	20.518	
Combined MCR	R0340	20.518	
Absolute floor of the MCR	R0350	4.191	
Minimum capital requirement	R0400	20.518	