

Monument Re Limited

Financial Condition Report at 31st December 2019





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Executive Summary

The Economic Balance Sheet (“EBS”) regulatory framework sets out the requirements for annual qualitative and quantitative reporting for insurance companies.

Monument Re Limited, together with its subsidiaries, is referred to in this report as “Monument Re”, the “Company” or the “Group”.

This report contains information about the Group’s business and performance, its corporate governance, risk profile, solvency valuation and capital management for the reporting period 1st January 2019 to 31st December 2019, with the balance sheet and solvency position shown at the reporting date 31st December 2019.

This report has been prepared in accordance with the Insurance (Public Disclosure) Rules 2015 and section 30 of Insurance (Group Supervision) Rules 2011, as promulgated by the Bermuda Monetary Authority (“BMA”), Bermuda’s regulator of insurance companies.

Business and Performance

Monument Re is a Bermuda based reinsurance company established to provide solutions for asset intensive portfolios through reinsurance or acquisition. In executing this dual insurance and reinsurance strategy, the Company looks to assume asset based risks within its risk appetite, and efficiently operate these businesses or portfolios. The focus includes two principal areas, namely:

- Acquisition of portfolios or direct insurers, primarily those in run-off and targeting mainly annuity, guaranteed savings or linked products; and
- Reinsurance of in-force blocks of long-dated, asset intensive liabilities, typically with guarantees.

Monument Re is a Class E reinsurer and holding company of other European insurance entities. It is subject to Group Supervision by the BMA through Solvency II Equivalence attained on a permanent basis from the European Insurance and Occupational Pensions Authority.

Monument Re has an established track-record of acquiring life insurance portfolios across Europe. Since incorporation, fourteen (14) transactions have been signed as detailed in the table below. These transactions support the Company’s strategy to build and grow the Ireland and Benelux platforms as well as demonstrating the capacity to develop and transact on opportunities in other territories.

Further details of these transactions can be found in section A.5 Company Structure.

Counterparty	Target	Country	Completion
Barclays Bank Plc	Barclays Insurance (Dublin) Designated Activity Company and Barclays Assurance (Dublin) Designated Activity Company, payment protection insurance (“PPI”) and short-term income protection	Republic of Ireland	March 2017; companies renamed Monument Assurance DAC (“MIDAC”) and Monument Insurance DAC (“MIDAC”), respectively; acquisition
Enstar Group Limited	Laguna Life Designated Activity Company (“Laguna”), term life protection business	Republic of Ireland	August 2017; entity renamed Monument Life Insurance Designated Activity Company (“Monument Life”) in April 2020; acquisition



Counterparty	Target	Country	Completion
ABN AMRO Bank N.V.	ABN AMRO Life Capital Belgium N.V. ("AALCB"), traditional savings business	Belgium	March 2018; entity renamed Monument Assurance Belgium N.V. ("MAB"); acquisition
Ethias S.A. ("Ethias")	FIRST A portfolio, traditional savings business	Belgium	September 2018 (transferred to Monument Life); portfolio transfer
Talanx AG	Aspecta Assurance International Luxembourg S.A. ("Aspecta"), unit-linked and traditional savings business	Luxembourg	October 2018; entity renamed Monument Assurance Luxembourg S.A. ("MAL"); acquisition
Amerborgh Financial Services B.V.	Robein Leven N.V. ("Robein"), unit-linked and traditional savings business	Netherlands	March 2019; acquisition
MetLife Europe Designated Activity Company ("MetLife")	A run-off portfolio of unit-linked, traditional savings and protection business	Republic of Ireland	Signed as reinsurance deal in June 2018 followed by a Section 13 transfer to Monument Life in April 2019
Enstar Group Limited (Alpha Insurance S.A.)	A run-off portfolio of traditional savings and credit life protection business	Belgium	May 2019; portfolio transfer
BenCo Insurance Holding B.V., a subsidiary of Storebrand Livsforsikring AS	Nordben Life and Pension Insurance Co Limited ("Nordben"), unit-linked and with-profit savings business	Guernsey	June 2019; acquisition
Curalia OVV	A run-off portfolio of traditional savings business	Belgium	December 2019; portfolio transfer
Rothsay Life Plc	A run-off portfolio of annuity business	United Kingdom ("UK")	Signed as reinsurance deal in March 2019, with portfolio transfer to Monument Life to follow (pending regulatory and UK Court approval)
Societe Generale S.A.	Inora Life Designated Activity Company ("Inora"), unit-linked savings business	Republic of Ireland	September 2019; acquisition
Società Cattolica di Assicurazione - Società Cooperativa ¹	Cattolica Life Designated Activity Company, unit-linked savings business	Republic of Ireland	Signed December 2019; pending regulatory approval
GreyCastle Holdings Ltd ²	A run-off portfolio of annuity and term life protection business	Bermuda	Signed March 2020; pending regulatory approval

¹ Financials for this transaction are not included in this report as not completed on the reporting date

² Financials for this transaction are not included in this report as not completed on the reporting date



The Company recorded gross written premiums of €521.1m (2018: €475.6m) and an investment return of €63.8m (2018: €15.0m).

Further details of the Company's results for the reporting date are provided in sections A.6 Insurance Business and A.7 Investment Performance.

System of Governance

The Company has established a system of governance appropriate to the Company's business strategy and operations. There is clear delegation of responsibilities, reporting lines and allocation of functions through documented committee terms of reference and key function charters. The system of governance includes requirements relating to fitness and probity of persons responsible for key functions, remuneration practices and outsourcing activities. There were no material changes in the system of governance during the year ended 31st December 2019.

Further details of the Company's system of governance are provided in section B.

Risk Profile

The Company's risk management system is proportionate to the nature, scale and complexity of the risks to which the Company is exposed. The system includes processes for the identification, assessment and reporting of all categories of risk. The risk management system includes the Solvency Self-Assessment, which assists the Board in determining whether there is adequate Available Capital to cover the Company's risks over its business planning horizon.

The Group's business activities give rise to market, insurance, credit, strategic, operational, liquidity and group risks. Further details of the Company's risk profile are provided in section C.

Solvency Valuation

Assets and liabilities presented in this report have been valued in accordance with EBS valuation principles. The Company's financial statements are prepared in accordance with Generally Accepted Accounting Principles ("GAAP") in the United Kingdom and Republic of Ireland. There are no material differences between valuation principles used under the EBS and GAAP frameworks.

Further details of the Company's valuation provisions are provided in section D.

Capital Management

The structure of the Company's Available Capital, as defined under the EBS regime, is comprised of share capital and retained earnings. The capital management policy focuses on ensuring compliance with externally imposed capital requirements and to maintain appropriate capital ratios in order to protect the security of its stakeholders, including cedants and policyholders, while maintaining shareholder value.



The capital requirements are calculated using the capital regime promulgated by the BMA. The following table summarises the Company's Available Capital and Capital Coverage Ratio at 31st December 2019 with a comparison against the previous reporting date, 31st December 2018.

Figures in €'000	31 st December 2019	31 st December 2018
Available Capital	277,451	217,871
Enhanced Capital Requirement	58,566	28,996
Free Surplus	218,885	188,875
EBS Capital Coverage Ratio	474%	751%

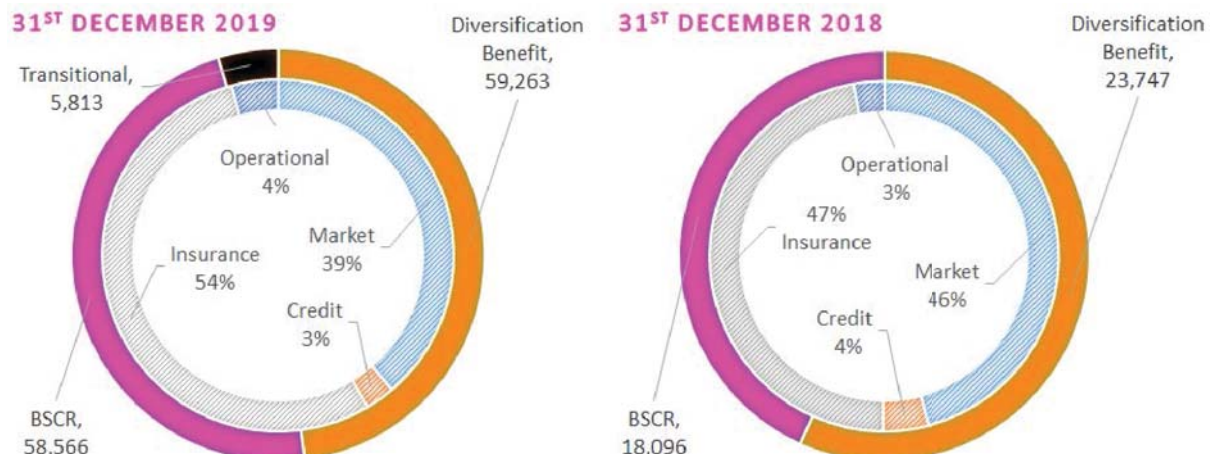
The Group's Available Capital amounted to €277.5m compared to its Enhanced Capital Requirement ("ECR") of €58.6m. This produced an EBS Capital Coverage Ratio of 474%.

The significant increase in Available Capital over the reporting period is largely driven by the completion of six transactions and a further capital contribution of €20.0m from Monument Finco Limited ("Finco"), the immediate parent company of Monument Re.

The Enhanced Capital requirement is given by the maximum of the Bermuda Solvency Capital Requirement ("BSCR") and the regulatory Minimum Solvency Margin ("MSM"). At the reporting date, the BSCR was the binding constraint to the Group and the MSM was lower at €55.4m. The increase in ECR is mainly driven by the completion of six transactions over the reporting period, which more than outweighed the increase in MSM.

The BSCR regime is currently in a transition phase with the new capital regime coming into effect from 1st January 2019, replacing the previous capital regime. The transitional period for Monument Re is calculated as 9 years, and is based on the amounts of life and P&C BSCR at the reporting date. As at 31st December 2019, the reported BSCR is based on 8/9th of the previous capital regime and 1/9th of the new capital regime.

The diagram below shows the BSCR for the Company at 31st December 2019 with a comparison against the previous reporting date, 31st December 2018. The BSCR has been shown split by risk module. The outer ring shows the total diversified BSCR, the level of diversification benefit realised within the Group and, where relevant, any transitional benefit in moving to the new capital regime. The inner ring shows each risk module as a proportion of total undiversified capital. Figures are in €'000.





A. Business and Performance

A.1 Company Profile

Monument Re Limited is a Bermuda based Class E life reinsurer (with registration number 51969 and incorporation date 27th October 2016) and a Designated Insurer with Group supervision by the Bermuda Monetary Authority (“BMA”).

A.2 Group Supervisor

Table 1: Group Supervisor

Details	Group Supervisor
Name	Bermuda Monetary Authority
Jurisdiction	Bermuda
Address	BMA House, 43 Victoria Street, Hamilton, HM12, Bermuda
Contact	Craig Swan, Managing Director, Supervision (Insurance)
Email Address	cswan@bma.bm
Phone Number	+1 (441) 295 5278

Group supervision is carried out by the BMA within a comprehensive legislative framework, which includes, but is not limited to:

- The Insurance Act 1978 (the “Act”);
- The Insurance (Group Supervision) Rules 2011 (the “Group Supervision Rules”);
- The Insurance (Prudential Standards) (Insurance Group Solvency Requirement) Rules 2011 (the “Group Prudential Standards”); and
- The BMA Guidance Note on the Role of the Designated Insurer (the “Guidance Note”).

A.3 Approved Group Auditor

Table 2: Approved Group Auditor

Details	Approved Group Auditor
Name	PricewaterhouseCoopers Limited
Jurisdiction	Bermuda
Address	P.O Box HM 1171, Hamilton, HM EX, Bermuda
Contact	Damian Cooper, Director
Email Address	damian.cooper@pwc.com
Phone Number	+1 (441) 295 2000



A.4 Company Ownership

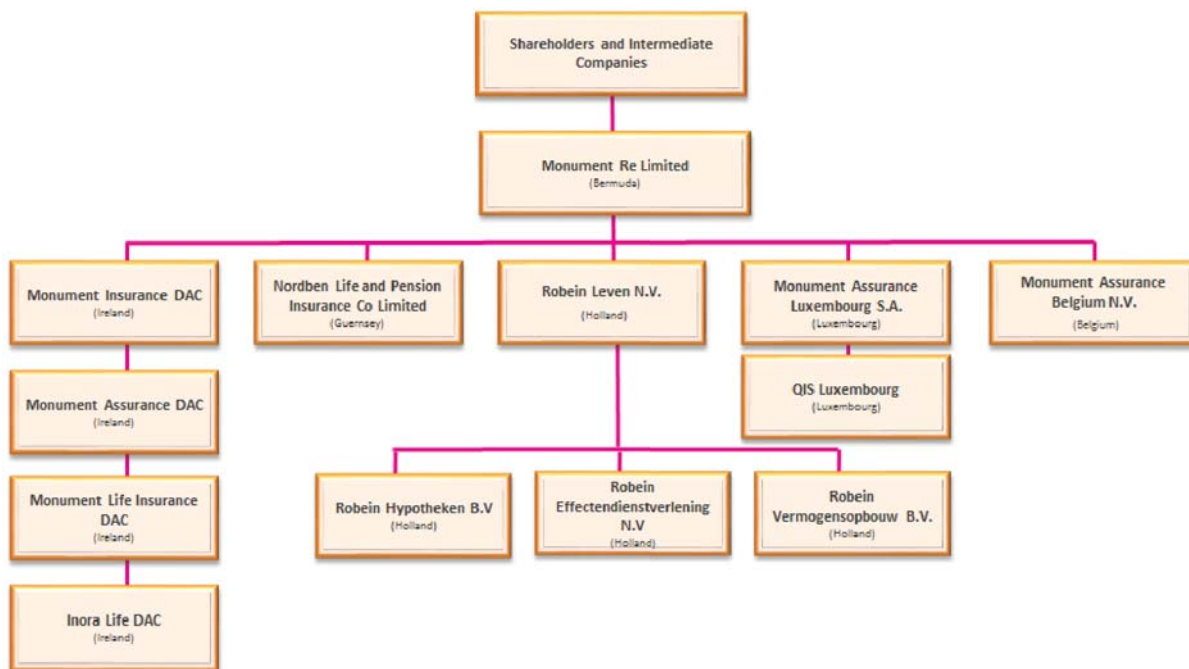
Monument Re is backed by high quality shareholders made up of several institutional investors and individual investors who are experienced insurance professionals. In particular, our ultimate institutional investors are:

- Hannover Rück SE (“Hannover Re”) (GR: HNR1) - Hannover Re was established in 1966 and is the world’s third largest reinsurer with gross premium income of €19.2bn at year-end 2018. Hannover Re transacts all lines of property and casualty and life and health reinsurance and conducts business on all continents, with more than 100 branches or subsidiaries.
- Enstar Group Limited (“Enstar”) (NASDAQ: ESGR) - Enstar is publicly traded on the NASDAQ and is a leading Bermuda-based Property & Casualty (“P&C”) run-off consolidator.
- E-L Financial Corporation (“ELFC”) (TSE: ELF) - ELFC is an investment and insurance holding company incorporated in 1969 in Canada, and is publicly traded on the Toronto Stock Exchange. ELFC’s strategy is to accumulate shareholder value through long-term capital appreciation and dividend income from its investments.

The Company has a seasoned Board of Directors, nominated by each shareholder and chaired by Jonathan Yates, and an experienced management team led by Manfred Maske.

A.5 Company Structure

The Company’s simplified Group structure, at 31st December 2019 is summarised below and focuses on regulated entities only³:



³ All holdings in subsidiaries are 100% participations except for Quality Insurance Services (“QIS”) Luxembourg which is 25% owned by Monument Assurance Luxembourg S.A. (“MAL”). MAL has signed an agreement to acquire 100% ownership of QIS Luxembourg. This transaction remains subject to regulatory approval.



Monument Insurance Designated Activity Company & Monument Assurance Designated Activity Company

Monument Re completed the acquisition of two Irish insurance subsidiaries of Barclays on 1st March 2017. These subsidiaries were rebranded Monument Insurance Designated Activity Company (“MIDAC”), a non-life assurance company, and Monument Assurance Designated Activity Company (“MADAC”), a life insurance company. These entities are both authorised in Ireland and regulated by the Central Bank of Ireland (“CBI”). They were established to underwrite Payment Protection Insurance (“PPI”) and short-term income protection to Barclays’ customers in the UK on a freedom-of-services basis. This portfolio is closed to new business. A full mis-selling indemnity was agreed with Barclays as part of the acquisition terms.

Monument Life Insurance Designated Activity Company (formerly known as Laguna Life Designated Activity Company)

On 29th August 2017, the Company completed the acquisition of Monument Life Insurance Designated Activity Company (“Monument Life”, formerly Laguna Life Designated Activity Company), an insurance undertaking, authorised in Ireland and regulated by the CBI. Monument Life was acquired from Enstar Group Limited, a leading global insurance run-off consolidator and also a minority shareholder of Monument Re and comprises a closed book of term life protection risks within the UK and Spain and voluntarily ceased to underwrite new business in 2007 and 2009 respectively.

On 19th June 2018, Monument Life acquired a run-off portfolio of linked and traditional business from MetLife Europe Designated Activity Company (“MetLife”), an Irish incorporated entity. This transaction was initially done through reinsurance to Monument Re. In accordance with Irish High Court approval, the portfolio transferred into Monument Life as of the 1st April 2019, with the terms and conditions unchanged.

On 28th September 2018, following receipt of regulatory approval, the Company completed the acquisition of a run-off portfolio of flexible premium retail life insurance contracts from Ethias S.A. (“Ethias”), known as the FIRST A Portfolio. In accordance with the authorisation by the National Bank of Belgium, the FIRST A portfolio transferred into Monument Life in Ireland, with the terms and conditions unchanged except for the loss of the Belgian state guarantee. Ireland does not maintain an equivalent system of guarantee.

On 22nd May 2017, Monument Re established a service company in Ireland, Monument Insurance Services Limited (“MISL”), to provide services to the Group entities. The staff, previously employed by MIDAC, MADAC and Monument Life transferred to MISL. MISL now acts as an outsourcer for these entities as well as supporting other Group activities.

Trading as Monument Insurance in Ireland, these entities provide a sound platform for the Group to write further transactions from Ireland and the European Union on a cross-border basis.

Monument Assurance Belgium N.V. (“MAB”)

On 28th March 2018, the Company completed the acquisition of ABN AMRO Life Capital Belgium S.A. (“AALCB”), a Belgian Life insurance company in run-off, following receipt of regulatory approval by the National Bank of Belgium. AALCB was subsequently renamed to Monument Assurance Belgium N.V. (“MAB”).

On that same date, the Company established a service company in Belgium (collectively with MISL, “Service Companies”), Monument Insurance Belgium Services Sprl (“MIBS”), to provide services to the Group’s regulated entities in the Benelux region and to also provide services to other Group entities.

Monument Assurance Luxembourg S.A. (“MAL”)



On 2nd October 2018, following receipt of regulatory approval by the Commissariat aux Assurances (“CAA”), the Company completed the acquisition of Aspecta Assurance International Luxembourg S.A. (“Aspecta”), a life insurance undertaking based in Luxembourg with branches in Germany, Italy and Spain. Aspecta specialised in unit-linked single premium products targeted towards high net-worth individuals as well as in unit-linked regular premium products for the retail market and it ceased writing new business at the end of 2010. After completion, Aspecta was renamed Monument Assurance Luxembourg S.A. (“MAL”).

2019 Transactions

In 2019, Monument Re built upon the success of 2018 with the completion of six further transactions and the signing of two further transactions that remained subject to regulatory approval at 31st December 2019. These are outlined below:

- On 18th March 2019, following receipt of regulatory approvals, the Company completed the acquisition of Robein Leven N.V. and its subsidiaries from Amerborgh Financial Services B.V. Robein Leven is a closed life insurer domiciled in the Netherlands with traditional savings and unit-linked products.
- On 26th March 2019, the Company entered into an agreement to acquire a portfolio of Irish annuities from Rothesay Life Plc. The acquisition has been structured initially as reinsurance to Monument Re (in place at 31st December 2019) and is expected to be followed by a Part VII transfer of the portfolio to Monument Life, subject to regulatory and court approvals.
- On 29th May 2019, following receipt of regulatory approvals, the Company completed the acquisition of a run-off portfolio of traditional life and credit life business from Alpha Insurance S.A., a Belgian composite insurance company and a wholly-owned subsidiary of Enstar Group Limited. The portfolio transferred into MAB in Belgium.
- On 27th June 2019, the Company completed the acquisition of Nordben Life and Pension Insurance Co Limited (“Nordben”) from BenCo Insurance Holding B.V.. Nordben contains a portfolio of unit-linked and with-profits business and was fully closed to new business in 2017. This transaction established the Company’s presence in Guernsey.
- On 16th September 2019, following receipt of regulatory approvals, the Company completed the acquisition of Inora Life Designated Activity Company (“Inora”) from Société Générale S.A. Inora is a life insurer domiciled in Ireland and contains a portfolio of unit-linked business which closed to new business in 2012.
- On 16th December 2019, following receipt of regulatory approvals, the Company completed the acquisition of a run-off portfolio of traditional savings business from Curalia OVV, a Belgian mutual insurer. The portfolio transferred into MAB in Belgium.

In addition to the above completed transactions, Monument Re has signed two further transactions. The financial results of these transactions are not included in this report because they remain subject to regulatory approval.

- On 10th December 2019, the Company signed the acquisition of Cattolica Life Designated Activity Company (“Cattolica”) from Società Cattolica di Assicurazione Società Cooperative. Cattolica is a closed Irish entity which wrote unit-linked business on a cross-border basis in Italy. This transaction remains subject to customary closing conditions, including receipt of regulatory approval.
- On 21st March 2020, the Company signed an agreement to acquire GreyCastle Holdings Ltd (“GreyCastle”) and its subsidiaries, which include GreyCastle Life Reinsurance (SAC) Ltd and



GreyCastle Services, from the shareholders of GreyCastle Holdings Ltd. The closing of the transaction is subject to regulatory approval. GreyCastle is domiciled in Bermuda and is focused on managing a portfolio of annuity and life risks

Monument Re continues to pursue transactions that further support the Company's strategy to build and grow its existing platforms as well as developing opportunities in other territories.

A.6 Insurance Business

The following tables show premium volumes by line of business and geographical location.

Table 3: Gross Written Premium by Line of Business

Line of Business (€'000)	2019	2018
Annuities	241,643	154,520
Savings and Guarantees	238,406	282,109
Protection	12,110	4,278
Payment Protection Insurance	28,980	34,657
Total Gross Written Premiums	521,139	475,564

Table 4: Gross Written Premium by Geographical Location

Geographical Location (€'000)	2019	2018
Belgium	246,623	282,356
Ireland	145,044	2,055
Greece	50,656	-
Spain	42,903	942
United Kingdom	29,565	189,816
Other	6,348	395
Total Gross Written Premiums	521,139	475,564



A.7 Investment Performance

The following table shows the Company's investment return, net of investment expenses, as reported in the statutory financial statements for the years ended 31st December 2019 and 2018.

Table 5: Investment Performance

Investment Performance (€'000)	2019	2018
Cash & Cash Equivalents	15	163
Investments	17,444	3,033
Policy Loans	1,186	118
Gross Investment Income Earned	18,645	3,314
Income from Funds Withheld	11,877	12,171
Investment Expenses	(4,503)	(706)
Net Realised Gains and Losses	37,904	(500)
Change in Fair Value	(158)	734
Net Investment Return	63,765	15,013

A.8 Other Material Information

There is no other material information to be provided.



B. Governance Structure

B.1 Parent Board and Senior Executives

Parent Board Structure

Monument Re is the operating company from where the Board of Directors (“Board”) governs the Group. Pursuant to the Group Supervision Rules, Monument Re, as the designated insurer and specified insurer, is the ultimate insurance holding company of the Group for the purposes of Group supervision by the BMA.

The Board plays a critical role in the successful operation of Monument Re, being ultimately responsible for sound and prudent governance and oversight of the Company. The Board’s duties, membership, frequency of meetings and quorum is defined in the Board charter. The Board meets at least four times a year in Bermuda. The mix of skills and experience of Board members ensures that there is an appropriate level of experience, knowledge and expertise that is commensurate with the nature, scale and complexity of Monument Re’s business. Membership of the Board and its committees will be reviewed at least every three years, or more frequently upon a material change in business activities or risk profile, in compliance with the Group Supervision Rules.

Monument Re’s Board includes four non-Executive Directors and one Executive Director whose duties include, but are not limited to:

- Maintain an adequate understanding of the Company’s total business and operations to be able to test and challenge the decisions of other Directors and Senior Management;
- Devote sufficient time to enable the proper discharging of the Director’s governing function duties and attend all Board meetings where possible;
- Through Board meetings and activities, assist with determining the long and short-term strategy of the Company;
- When requested by the Board, represent the Company in its dealings with third parties;
- At all times comply with the legal, fiduciary and common law duties as a Director, as well as applicable regulation, including the requirements of the BMA and ensure that any conflicts of interest are properly resolved; and
- Liaise with external auditors, PricewaterhouseCoopers (“PwC”) Bermuda, as to their findings.

Monument Re’s Directors comprise the following:

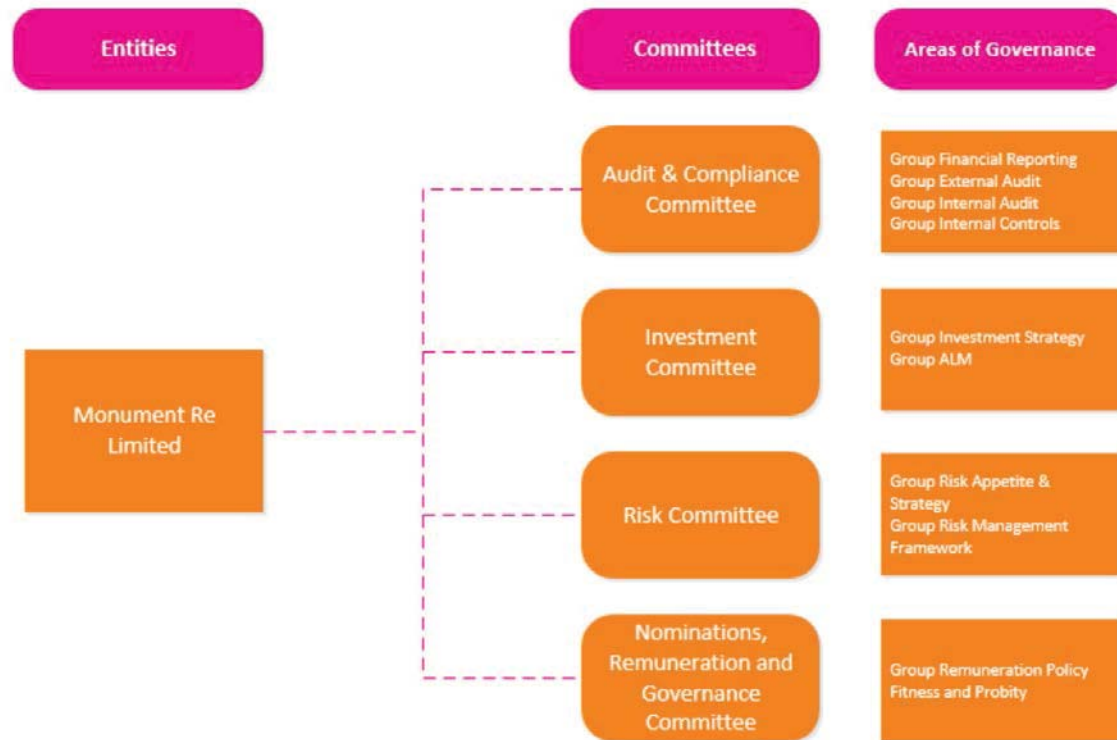
- Jonathan Yates (Chairman);
- Clive Rowe (nominated by ELFC);
- Paul Bohus (nominated by Enstar);
- Michael Winkler (nominated by Hannover Re); and
- Manfred Maske (Group Chief Executive Officer (“Group CEO”).

The Board has delegated certain authorities either directly or indirectly to a number of committees, which meet in Bermuda, each with their own terms of reference.

The key Board committees at Monument Re are depicted below:



Monument Re Limited Governance Structure



Note that the other Monument entities are each governed by a Board of Directors and have additional committees as their size and scope requires.

The table below provides an overview of the key attendees and the role and responsibilities of each committee:

Table 6: Committee Roles and Responsibilities

Committee	Key Attendees	Key Responsibilities
Audit and Compliance	<ul style="list-style-type: none"> Paul Bohus (Chairman); Michael Winkler; and Clive Rowe 	<p>Ensuring the integrity of financial statements and the financial reporting process;</p> <p>Overseeing, challenging and reviewing both the internal and external audit functions; and</p> <p>Reviewing and monitoring the adequacy and effectiveness of the Company's Compliance function, and risk and compliance training programs.</p>
Risk	<ul style="list-style-type: none"> Michael Winkler (Chairman); Paul Bohus; Jonathan Yates; and Manfred Maske 	<p>Providing leadership, direction and oversight to Monument Re's risk appetite and tolerance, and Risk Management Framework;</p> <p>Reviewing and recommending for Board approval all risk policies; and</p> <p>Overseeing the effectiveness of the internal</p>



Committee	Key Attendees	Key Responsibilities
		control system.
Investment	<ul style="list-style-type: none"> Clive Rowe (Chairman); Jonathan Yates; Michael Winkler; and Manfred Maske 	<p>Overseeing the development of the investment strategy and the making, holding and disposal of investments;</p> <p>Monitoring compliance of investment portfolios with the policies, guidelines and risk limits; and</p> <p>Reviewing and approving periodically investment benchmarks and Key Performance Indicators for investment portfolios and investment function.</p>
Nominations, Remunerations and Governance	<ul style="list-style-type: none"> Jonathan Yates (Chairman); Clive Rowe; and Paul Bohus. 	<p>Assisting with the determination of the overall remuneration policy for the Group;</p> <p>Reviewing membership of the Board and Committees to ensure fitness and probity; and</p> <p>Assisting the Board in ensuring it retains an appropriate balance of skills to support Monument Re's strategic objectives.</p>

Executive Committee

The Executive Committee ("ExCo") is not a committee of the Board but acts in ensuring effective management and in developing Monument Re's business strategy and related policies. Monument Re's ExCo team is comprised of:



Executives are permanently based in Bermuda apart from Aidan Holton, Olivier Schmidt-Berteau, Koen Depaemelaere, Gemma Cerasi and Kieran Hayes. Kieran Hayes recently stepped down as Group Head of Business Integrations and has retained his position of CEO, MIDAC and MADAC.

ExCo will draw its attention to risk management and governance matters and is effectively the executive arm of the Board, responsible for undertaking all management and operational actions to ensure the effective implementation of Monument Re's strategic objectives. ExCo (and the Board) also have explicit focus and responsibility for new acquisitions. The table below provides an overview of the key responsibilities of the ExCo:

**Table 7: ExCo Roles and Key Responsibilities**

Committee	Key Attendees	Key Responsibilities
ExCo	<ul style="list-style-type: none"> Manfred Maske (Chairman); and All Executive Officers 	<p>Formulating and recommending to the Board the annual Business Plan, with due consideration to the risk appetite statement, tolerance and limits;</p> <p>Reviewing and considering the development of high-level policies and recommend these to the Board for approval;</p> <p>Reviewing compliance monitoring results to ascertain ongoing adherence to the BMA regulatory requirements and minimum standards; and</p> <p>Reviewing potential reinsurance and acquisition transactions, including pricing, due diligence, integration planning and operations for presentation to and ultimate approval by the Board. Therefore, it will assist the Board in fulfilling its role of an “Underwriting Committee”.</p>

Senior executives are individually and collectively responsible for establishing systems and controls that produce complete, reliable, clear, consistent, timely, and relevant reporting concerning the business activities and risks to which Monument Re is exposed. In particular, they are responsible for:

- Providing the Board with timely, accurate and comprehensive reports that highlight current and prospective changes in business activities, profitability, capital and funding liquidity position, risk profile or key drivers;
- Reporting promptly to the Board any material deficiencies in the effectiveness of Monument Re’s functions or any decisions which deviate materially from the Board approved risk appetite and operational strategy;
- Reviewing and approving all material outsourcing arrangements and for the effective performance and oversight of outsourced functions or tasks;
- Completion of all required returns and financial statements in an accurate, complete and timely manner; and
- Reviewing the adequacy and effectiveness of the internal control environment and systems and controls.

Key Functions

The Company has determined a number of key functional activities as being those which best support the governance and business objectives. Each key function has an equal standing within the system of governance and its activities are co-ordinated and monitored through the ExCo team.

The Company considers its key functions to be:

- Risk management function, led by the Group Chief Risk Officer, and the Compliance & Internal Audit functions, led by Group General Counsel and Group Head of Internal Audit, respectively,



are collectively responsible for the oversight of the ongoing day-to-day management of the business;

- Finance function, led by the Group Chief Financial Officer (“CFO”), is responsible for the day-to-day management of all finance, financial reporting and investment matters;
- Actuarial function, led by the Group Chief Actuary, is responsible for the coordination and calculation of the actuarial liabilities, capital management and reinsurance;
- Investment function, led by the Group Chief Investment Officer (“CIO”), is responsible for implementing and managing the investment, asset liability matching strategy and liquidity position of the Company;
- Underwriting function, led by the Group CFO, is responsible for ensuring that pricing and terms for accepting risks in a transaction are properly understood and priced for; and
- Operations function, led by the Group CEO, is responsible for the day-to-day operational management of the business.

It is the responsibility of the key function owners to maintain the appropriate policy and procedures documentation, which incorporate the function’s responsibilities for operations, risk management, internal control, internal audit, outsourcing and reporting. All governance documentation is reviewed at least annually by the senior executive management team and the Board according to the relevant terms of reference.

Remuneration Policy and Practices

The remuneration policy and practices have been developed to ensure the Company is able to attract, develop and retain high performing employees. The policy focuses on ensuring sound and effective risk management and recognises the long-term interests of the Company.

The remuneration policy is designed to meet the Company’s regulatory requirements. The Company has identified and assessed the applicable regulatory principles with respect to remuneration.

Monument Re provides for a range of benefits to employees including contractual salary, variable bonuses and benefits that are moderated with regard to variable and fixed elements, as well as term of award. Variable annual bonuses are defined by individual objectives linked to the performance of Monument Re and the individual. Variable longer-term bonuses relate to the proven performance of Monument Re and its transactions over longer periods. The selection of criteria for the variable compensation system and upper limits of variable compensation elements by the Nominations, Remunerations and Governance Committee ensure that inappropriate incentives are not offered, which may persuade employees to make decisions outside the risk appetite limits of Monument Re.

The Board members of Monument Re were not remunerated in 2019 by Monument Re aside from the Group CEO in the course of his duties as the Group CEO. All Board members are reimbursed for travel and accommodation expenses in respect of Board meetings.

Pensions and Early Retirement Schemes

Monument Re makes contributions to a post-employment defined contribution retirement plan based on a percentage of salary in respect of its Bermudian employees. Once the contributions have been paid, Monument Re has no further payment obligations. The assets of the benefit plan are held separately from Monument Re in the form of a government approved group policy issued by a Bermudian insurance company. The mandatory provision of approved retirement plans for non-Bermudian staff has been deferred to allow for industry consultation but is expected to be in effect in the course of 2020.



Employees of the entities in Ireland, Belgium, Luxembourg, Guernsey, the Netherlands and London benefit from contributions made by the respective Service Companies to a post-employment defined contribution retirement plan based on a percentage of salary. The assets of the benefit plan are held separately from the respective Service Companies in the form of a group insurance policy issued by an insurance company in the respective jurisdiction.

The Board members do not receive any pension or early retirement benefits, contributions or allowances from Monument Re, aside from the Group CEO in the course of his duties as the Group CEO.

Material Transactions

No material transactions were executed during this period with the above named Board members, Senior Executives, or other individuals who exert significant influence over the Group.

B.2 Fitness and Propriety Requirements

Fit and Proper Assessment

Monument Re is committed to ensuring that it complies with its obligations under the BMA's 'Fit and Proper' framework at all times. The Company has arrangements in place to ensure the fitness, competence and propriety of persons effectively running the business and other staff who work in the business. In particular, Monument Re ensures that:

- All members of the Board and each of its committees and the members of the executive team, individually and collectively, have the requisite knowledge, skills, expertise and soundness of judgement appropriate to undertake and fulfil their responsibilities;
- All members of the Board and ExCo are, and continue to be, 'Fit and Proper' on an on-going basis; and
- Account is taken on the likely and/or actual impact of policyholder interests or of a shareholder holding a particular controller position at Monument Re to determine the application of the fit and proper requirements.

Monument Re assesses 'Fit and Proper' status against the following requirements:

- Competence and capability;
- Honest, ethical and acts with integrity; and
- Financial soundness.

Monument Re's Board is responsible for:

- Ensuring the Company complies with its legal and regulatory obligations and the 'Fit and Proper' Policy;
- Ensuring that processes and procedures to assess and document the fitness and propriety of its members, controllers and officers, as well as any individual employed by a service provider providing an outsourced function, are in place and in line with the BMA's requirements;
- Maintaining and supporting a culture that places a high value on appointing 'Fit and Proper' people and ensuring that robust processes exist that lead to the recruitment and appointment of 'Fit and Proper' persons;
- Reviewing any instances reported by the Compliance Officer or others whereby any employee is suspected of misusing systems or is suspected of committing fraud, money laundering, theft, financial crime or tax evasion; and



- Reviewing the membership of the Board and its Committees, including the composition of the chief and senior executives, no less frequently than every three years and upon a material change in the business activities or risk profile of the Group to ensure that the members of the Board and ExCo continue to be 'Fit and Proper'.

Monument Re's CEO is responsible for selecting, in close collaboration with the Compliance function, senior executives who are 'Fit and Proper' and who have the requisite knowledge and skills, given the nature, scale and complexity of the business.

The Compliance Officer is responsible for:

- Monitoring any changes or potential changes to the law and regulatory rules dealing with fitness and probity and reporting to the Board and senior management on the impact of these changes;
- Creating and maintaining the processes and underlying procedures as set out in the 'Fit and Proper' Procedures document;
- Monitoring that the 'Fit and Proper' Policy and underlying procedures are fully implemented; and
- Liaising with the BMA in relation to the 'Fit and Proper' Policy as required under applicable legislation and regulations.

In appointing a candidate to any role within Monument Re, the qualities and skills of that person are carefully evaluated against the specified criteria for the role to ensure the individual has the competence and capability required. The duties and responsibilities of each employee are set out in a job specification, which is discussed as an integral part of the recruitment process.

Monument Re ensures that the 'Fit and Proper' system and controls in place are tested periodically to ensure they are fit for purpose. Any weaknesses in the systems and controls in place will be reported to the Compliance Officer and a plan for rectification must be put in place, which includes appropriate timeframes.

Monument Re expects, and supports, controllers to maintain all professional qualifications, including the fulfilment of continuing professional development requirements, that may be relevant to the person's fitness for his/her current role and responsibilities.

Where Monument Re becomes aware that there may be concerns regarding compliance with the requirements described in the 'Fit and Proper' Policy, an investigation into such concerns and appropriate action shall be taken immediately.

Adherence to policies and procedures is assessed on an annual basis as part of the employees' performance review. An annual Board performance and effectiveness review is also undertaken.



Board Professional Qualifications, Skills and Expertise

Monument Re's Directors comprise the following:

Table 8: Board Member Professional Qualifications, Skills and Expertise

Board Member	Professional Qualifications, Skills and Expertise
Jonathan Yates – Chairman	<p>Jonathan is a Fellow of the Institute of Actuaries with over thirty years of experience in the life insurance industry. He was previously CEO of Windsor Life Assurance Company Limited and, subsequently, Guardian Assurance Company Limited and a Director of various companies within the respective Groups, including Ark Life Assurance Company Limited in Ireland. Jonathan was also previously Group Finance Director of Phoenix Group Holdings Plc; a UK listed company as well as a Director of various Group companies, including the life insurance companies within the Group and Ignis Asset Management.</p> <p>He has previously held non-Executive Directorships of Paternoster Insurance Company Limited, in the UK, and The Empire Life Insurance Company, in Canada. Jonathan is currently a non-Executive Director with the Viridium Group in Germany, including the various life insurance companies within the Group. He is also Chairman of MIDAC, MADAC and Monument Life.</p>
Clive Rowe	<p>Until October 2019, Clive was a General Partner and Managing Member of Oskie Capital Management, a New York based investment fund focused on companies going through significant transformations. He founded the firm in 2010 and was a Portfolio Manager responsible for investments in media, telecom, energy and health care including managed care organisations (health insurers). Prior to founding Oskie Capital, Clive was a partner at SLS Capital, a New York based long short equity fund, which he co-founded in 1999. Prior to his career in the investment business, Clive worked at Monitor Company, a strategy consultancy where he co-led the restructuring Group.</p> <p>Clive is currently a Board Member of ELFC, a Toronto based holding company with a portfolio of investments. ELFC owns a Canadian life insurer Empire Life Insurance Company (regulated by OSFI) and he serves on its Board and as Chairman of its Investment Committee. He is also on the Board of Algoma Central Corporation, a publicly traded shipping company and there he is Chairman of the Corporate Governance Committee. In the past, Clive served on the Board of Dominion of Canada, a property and casualty insurer prior to its sale to Travellers in 2013. Clive also served as Chairman of the Board of Roadone Logistics, a Boston based trucking company, from 2012 to June 2015.</p>
Paul Bohus	<p>Paul is a Senior Vice President of Corporate Development at Enstar. He has significant experience in the (re)insurance industry, particularly in mergers and acquisitions. Paul has been with Enstar since 2014 and is responsible for executing and overseeing all stages of the acquisition process including strategy, alternative capital, due diligence, valuation, financial impact analysis and integration. Prior to joining Enstar, Paul spent over ten years in public accounting, focusing on the reinsurance industry. Paul is a Certified Public Accountant (Ohio, USA).</p>



Board Member	Professional Qualifications, Skills and Expertise
Michael Hermann Winkler	<p>Michael is a member of the Swiss Association of Actuaries. He is the Managing Director of RefinSol GmbH, of which he is also the founder and Executive Director, providing consulting services for international reinsurance companies.</p> <p>Michael has also served as CEO of WRM Reinsurance AG, a specialised carrier for bespoke reinsurance transactions for life insurance companies in the area of Financial Solutions.</p> <p>Michael brings over thirty years of experience to Monument Re, having covered multiple roles in the life reinsurance industry since 1980.</p>
Manfred Maske – Group Chief Executive Officer	<p>Manfred is a Fellow of the Institute of Actuaries with over twenty years of experience in the life industry across a number of territories. He was previously CEO and Director of Legal and General Reinsurance in Bermuda and CEO and Director of Legal & General Gulf in the Middle East. He has worked previously in a range of management and technical roles within Legal & General in the UK, culminating in the role of International Actuary, where he sat on the Boards of start-ups and either as member or chair of the Investment Committee. Prior to this, Manfred held actuarial roles with PricewaterhouseCoopers in the UK, Old Mutual and Momentum Life in South Africa.</p>

Senior Executive Professional Qualifications, Skills and Expertise

Monument Re's Senior Executive team is comprised of:

Table 9: Senior Executive Professional Qualifications, Skills and Expertise

Senior Executive	Professional Qualifications, Skills and Expertise
Manfred Maske – Group Chief Executive Officer	Details as provided above.
Alex Brogden – Group Chief Financial Officer	<p>Alex is a Fellow of the Institute of Actuaries with over fifteen years of experience in the life industry. His previous role was Senior Corporate Actuary at the Phoenix Group, where his role included pricing and capital structuring of acquisitions and reinsurance, managing the Group's defined benefit pension schemes and developing significant capital management actions. He was previously Pricing Actuary at Admin Re (part of the Swiss Re Group), pricing closed fund transactions, including the c.GBP750m acquisition of Barclays Life. Prior to that, Alex was a life insurance consultant at Willis Towers Watson and worked on a number of client projects, across the UK, Europe, US and Asia.</p>



Senior Executive	Professional Qualifications, Skills and Expertise
Roger Thompson – Group Chief Investment Officer	<p>Roger is a Chartered Accountant and Chartered Financial Analyst with over twenty-five years of professional experience in treasury and investments. His previous role was CIO at Enstar Group Limited, where his role included oversight of external investment managers, modelling of investment returns for potential acquisition targets, designing and executing optimal investment strategies for newly acquired companies. Roger was previously an Executive Vice President, CIO at AXIS Capital Holdings Limited and had involvement in AXIS's IPO and various capital raising projects, including debt, equity, preferred shares and LOC credit facilities.</p>
Neil Burt – Group Chief Actuary	<p>Neil is a Fellow of the Institute of Actuaries with over fifteen years of experience in the life industry. Neil was previously the Approved Actuary and Head of Actuarial Reporting for Legal & General Re, responsible for providing an opinion on the sufficiency of the company's long-term reserves and determining capital requirements in accordance with the BMA rules. Prior to Legal & General Re, Neil transferred from within the Legal & General Group in the UK where he worked within the Legal & General Retirement Finance team. In the UK, Neil supported the development of the Solvency II reporting, strategic planning and the international expansion of the Retirement division. Prior to Legal & General, Neil was an actuarial manager at Deloitte working on a number of Solvency II and M&A projects.</p>
David Leach – Group Chief Risk Officer	<p>David is a Fellow of the Institute of Actuaries with over twenty years of experience in the life industry. He was previously Deputy Chief Risk Officer for ReAssure Life Limited and Risk Management Head of Investment Oversight for ReAssure Group, a division of Swiss Re. Prior to that, David held the role of Senior Risk Actuary for Guardian Financial Services. He has also worked in actuarial consulting roles at EY, Deloitte and Watson Wyatt (now Willis Towers Watson) and as Pricing Actuary at Munich Re. His consulting work focused on mergers and acquisitions in Europe and Asia, actuarial audit, risk management and Solvency II. David has written a number of articles on risk and actuarial topics, and chaired the Stress and Scenario Testing working party of the Institute and Faculty of Actuaries.</p>
Kieran Hayes – Chief Executive Officer, MIDAC & MADAC, Ireland	<p>Kieran has more than twenty years of experience in the insurance industry. He serves as CEO of MIDAC and MADAC and, until recently, also served within the Monument Group as Group Head of Business Integrations. Prior to that, from March 2011 to December 2017, he held the role of CEO of Monument Life in Ireland following Enstar's acquisition of the business from Citigroup in March 2011. Prior to that, from June 2004 to March 2011, he held a number of senior management roles with Citigroup, including Managing Director & VP Operations of Citigroup's life insurance business. From January 1998 to December 2002, he worked at Old Republic Insurance in Chicago, Illinois as Senior Vice President of Operations, and prior to that in a managerial capacity at Great West Life Insurance Company, also in Chicago.</p>



Senior Executive	Professional Qualifications, Skills and Expertise
Anthony Philip – Group General Counsel	<p>Anthony has over twenty-five years of experience serving as a Barrister and Attorney in the financial services industry in Bermuda. His last role was CEO of American International Company Ltd. (“AIG Bermuda”). Prior to that, he was Senior Vice President & General Counsel of AIG Bermuda. Anthony has served as a Senior Legal Adviser with Flagstone Reinsurance Limited, West End Capital Management (Bermuda) Limited (a fund management company) and Appleby, Spurling and Kempe Barristers and Attorneys. He was also the Manager of the Companies, Partnerships and Permits Division at the BMA.</p>
Aidan Holton – Chief Executive Officer, Monument Life, Ireland	<p>Aidan has over thirty years experience in the insurance sector, with a broad range of domestic and international experience. Aidan has led large teams of Accounting, Actuarial and IT Development staff through significant challenges and periods of organisational change. Aidan started his career with Irish Life in Dublin, where he originally trained as an accountant, working in a variety of roles from group finance to IT and sales. He was appointed to the role of Group CFO in Aviva Ireland in 2008, and subsequently worked in London and Paris with Aviva Europe. In 2013 he joined the Board of New Ireland Assurance Company as an Independent Non-Exec Director, and in 2014 was appointed as CEO of SCOR Global Life Reinsurance in Ireland. Aidan is a Board member of Insurance Ireland and Chair of the members International Council as well as representing the Insurance Industry on the Irish Governments IFS2020 Industry Advisory Committee.</p>
Olivier Schmidt- Berteau - Chief Executive Officer, MAL, Luxembourg	<p>Olivier has over twenty years of experience in the insurance industry. He has served in Luxembourg since December 2006, first as Risk Manager and Financial Controller, then CFO and finally from June 2010 as CEO of Aspecta Luxembourg International S.A., a company of the Talanx Group. In his latest function, he had responsibility to set up the run-off of the company. From June 2009 Olivier was also Executive Director of the finance and investment company of the Group in Luxembourg, Talanx Finanz (Luxemburg) S.A. From June 2009, Olivier also held this position within EURO International Reinsurance S.A. Luxemburg to prepare and complete the sale of the company one year later. Prior to that, Olivier had nearly ten years of experience in Germany in a number of senior management roles primarily in Risk Management and Financial Controlling with Gerling Beteiligungs-GmbH, Gerling G&A Versicherungs-AG and General Accident Versicherungs-AG. Olivier graduated from the Institut d’Etudes Politiques de Paris and holds a law degree.</p>
Koen Depaemelaere – Chief Executive Officer, MAB, Belgium	<p>Koen has more than fifteen years of relevant experience in the BeNeLux insurance market and was Director and CEO of the Life Insurance business at AXA Belgium. He held a mandate as President and previously CEO of AXA Private Management. He was also the CEO of the largest BeNeLux broker Vanbreda Risk & Benefits.</p> <p>He has led several digital transformations as CEO of Portima/Assurnet, the leading IT-platform in the Belgian Insurance sector, Chief Transformation Officer at SD Worx and CCO at Banksys/Worldline.</p> <p>Koen holds a Master of Engineering Science (ir.) from KU Leuven and an MBA from</p>

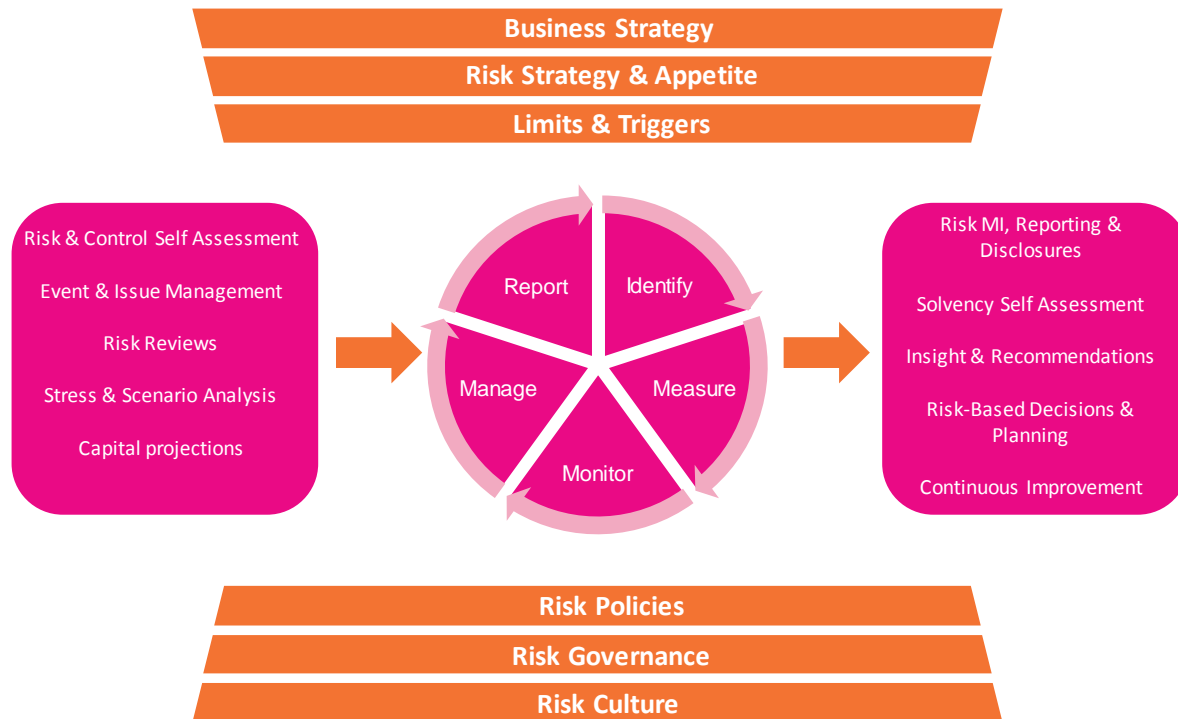


Senior Executive	Professional Qualifications, Skills and Expertise
	Vlerick Business School.
Warwick Helps – Chief Executive Officer, Nordben, Guernsey	<p>Warwick is a Fellow of the Association of Chartered Certified Accountants with thirteen years of professional experience in the finance industry.</p> <p>Warwick has served at Nordben since January 2012, first as Deputy CFO, then CFO and finally from May 2016 as CEO. In his latest function, he has taken responsibility for executing Nordben’s strategy to ensure the business is run-off as efficiently and profitability as possible with a strong focus on excellent operational management and communication skills to be able to motivate the staff to meet the challenges of running off the liabilities of the Company.</p> <p>Prior to Nordben, Warwick was an audit manager at Deloitte working predominantly with a mixture of insurance clients.</p>
Aad Van der Klugt – Chief Executive Officer, Robein, Netherlands	<p>Aad has over forty years experience in the insurance and financial sector in the Netherlands, and has led large organizations/teams (200 – 770 FTE) through significant challenges and periods of organisational change.</p> <p>Aad has held various management positions with a number of (medium) large insurance companies and pension administrators, such as ING, Nationale Nederlanden, Van Lanschot, Loyalis/APG, Vivat, Reaal, Zwitserleven and Mn Services.</p>
Gemma Cerasi – Head of Human Resources	<p>Gemma has over fifteen years experience within the Financial Services and IT sector. Prior to joining Monument Re, Gemma was Head of Human Resources (“HR”) for Ark Life. Prior to that she held various senior HR roles within Aviva at a local and European level across their Life and Pensions and General Insurance businesses. Gemma started her career with Oracle where she previously held positions within their Learning and Development division.</p>

B.3 Risk Management and Solvency Self-Assessment

Risk Management Processes and Procedures

Monument Re has established and maintains a Risk Management Framework, depicted as follows:



The Risk Management Framework is founded on a sound risk culture, an effective system of governance including committee structures and clear accountabilities, and a suite of supporting risk policies.

The Board has established a Risk Committee to assist the Board by providing leadership, direction and oversight with regard to Monument Re's Risk Management Framework, including risk appetite, limits, risk policies and risk reporting.

The risk strategy of the Group is aligned to the business strategy. Risk appetite statements express the Board's appetite across all categories of risk facing the business. Quantitative risk limits are set for key risks, along with early warning thresholds, which support proactive risk management. Exposures relative to limits and triggers are regularly monitored and reported to the Board.

The Risk Management Framework is applied to newly acquired businesses such that there is proportionate and consistent application of a single framework across the Group. A period of transition, in which pre-existing policies continue to operate, is typically required prior to the embedding of Group policies with respect to newly acquired businesses.

The material risks addressed by the Risk Management Framework include:

- Insurance/underwriting risk;
- Market risk;
- Credit risk;
- Liquidity risk;
- Operational risk;
- Group risk;
- Strategic risk; and



- Sustainability risk.

The Risk Management Framework covers both existing risks and emerging risks, the latter being specifically considered in regular emerging risks forums at Group level.

The key objectives of the risk management function, under the leadership of the Group Chief Risk Officer, are to:

- Maintain a sound and effective risk management framework that supports effective risk-based decision-making, including risk appetite statements and risk limits, and oversee the implementation of the Risk Management Framework via appropriate policies, processes and controls;
- Maintain a robust risk reporting framework, including processes and systems for commenting on the overall risk environment, addressing mitigating actions for risks identified, identifying any emerging risks, discussing relevant current issues as well as reporting on risk metrics that monitor risk exposures relative to agreed limits;
- Deliver all external reports as required to meet regulatory and other stakeholder expectations, including Solvency Self-Assessment, risk content for Capital and Solvency Returns, Financial Condition Reports, Financial Statements and Regular Supervisory Reports (where relevant);
- Actively review and challenge, in a second line capacity, all transactions and material activities of the Company, seeking to deliver a better overall outcome for the Group by either reducing the level of risk overall or improving the reward for certain assumed risks; and
- Ensure that the risk management function remains appropriately resourced, with the requisite skills, knowledge and capacity, to support the planned growth of the Group.

Implementation of Risk Management and Solvency Self-Assessment into the Insurance Group Operations

Risk reviews are a key component of the Group's Risk Management Framework. The purpose of a risk review is to provide the Risk Committee with an impartial view from the risk management function on material risk matters, ahead of final decision-making. The Risk Management Framework states the instances in which risk reviews are required, consistent with the Group's Delegated Authority Schedule, and the Board or Risk Committee may request a risk review at any time.

Risk reviews are carried out ahead of key decisions that will materially impact the risk profile of the Group, including decisions to bind the Company to a transaction. The results of risk reviews are presented to Risk Committee and are used to inform its risk-based recommendations to the Board.

Stress and scenario testing and projections of the Group's capital position are fundamental to the Group's approach to risk assessment. Stress and scenario testing is used to quantify how the economic balance sheet and capital requirements would be expected to change across a range of scenarios chosen to be most relevant to the decision at hand.

A key risk management objective is to ensure that the risk profile of the Group remains within risk appetite as set, at least annually, by the Board, and to highlight any deviations and propose rectifying actions. Reporting of exposures relative to early warning thresholds supports proactive risk management.

On a day-to-day basis, risk management is implemented first-and-foremost by the risk-informed actions of our people, consistent with the requirements of our risk policies and formalised through a set of processes and controls, and supported by an ongoing programme of risk management training.

A Risk and Control Self-Assessment ("RCSA") process is carried out at least annually. This process



requires business functions to review and self-assess the effectiveness of controls mitigating the key risks identified. This process is facilitated and overseen by the risk management function, and the results are summarised and presented to Risk Committee, including actions to address themes and issues identified.

Relationship between the Solvency Self-Assessment, Solvency, and Capital and Risk Management Systems of the Insurance Group

Monument Re quantifies its capital requirements in accordance with the Bermuda Solvency Capital Requirement (“BSCR”) set out within Bermuda’s economic capital regime. A capital management buffer is targeted substantially in excess of BSCR.

Projections of available capital and economic capital requirements are carried out at least annually. This includes analysis of management actions that can be taken in advance or in response to adverse events, to ensure that the capital position remains robust. These projections, combined with stress and scenario testing across a range of adverse scenarios, underpin the Group’s capital planning.

These projections are updated as required based on actual transactions, in order that capital projections remain appropriate. Material changes to the risk profile of the Group also trigger review of the appropriateness of risk limits, tolerances and triggers. Thus, capital and risk management remain synchronized as the business grows.

Solvency Self-Assessment Approval Process

Monument Re considers the above analyses as part of its solvency self-assessment process. This is known as Own Risk and Solvency Assessment (“ORSA”) for European entities within the Group, Commercial Insurers Solvency Self-Assessment (“CISSA”) for Monument Re as a Bermudian Class E life reinsurer and Group Solvency Self-Assessment (“GSSA”) for Monument Re as a Designated Insurer with Group supervision by the BMA.

The proposed stress scenarios are presented to Risk Committee for approval, prior to commencement of the solvency self-assessment. The results of the solvency assessment are reviewed by Risk Committee for recommendation to the Board for approval. The solvency self-assessment process involves cross-functional collaboration owing to the broad remit of the exercise. At least annually, Monument Re reports on this process to the relevant supervisory authorities.

B.4 Internal Control

Internal Control System

The internal control system encompasses the policies, processes and activities that contribute to the reliability of financial reporting, the effectiveness and efficiency of operations and compliance with laws and regulations.

The Board and the CEO, including senior executives, are responsible for adopting an effective internal controls framework.

The Board has established an internal control policy that outlines the processes by which the internal control system is implemented to provide for and maintain the suitability and effectiveness of internal control. The policy outlines the roles and responsibilities, procedures and reporting requirements to be applied.

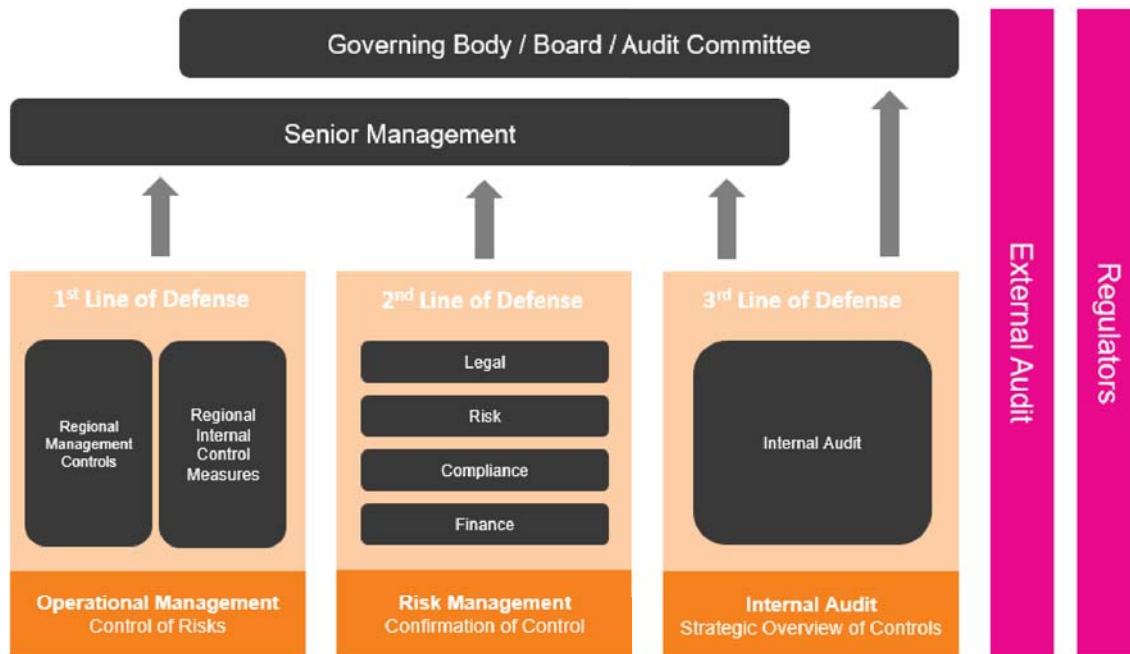
The internal control system combines the following components:

- Internal control environment;
- Risk assessment;



- Internal control activities;
- Information and communication; and
- Monitoring.

Monument Re applies a “Three Lines of Defense” model for Enterprise Risk Management.



Such a model is widely adopted across the financial services industry and allows for appropriate segregation of risk ownership, oversight and assurance responsibilities. In particular:

- **1st line of defense:** Individuals and committees with direct responsibility for the management, control and reporting of risk;
- **2nd line of defense:** Individuals and committees with responsibility for the design, coordination, oversight of the effectiveness and integrity of Monument Re’s risk management and internal control framework; and
- **3rd line of defense:** Individuals and committees providing independent assurance and challenge in respect of the effectiveness and integrity of the Risk Management Framework.

Monument Re has defined high-level principles and standards to ensure that situations, which could lead to potential conflicts of interest, are appropriately managed. These are formally described in Monument Re’s Conflicts of Interest policy.

The Group risk register records ownership of each risk. The risk owner is responsible for ensuring that risks are identified and that controls remain appropriate on an ongoing basis to mitigate the risks. The Group risk register is periodically reviewed by the Group Chief Risk Officer and is subject to formal review across the business as part of the RCSA at least annually. This process requires business functions to update the risk register, including the mapping of controls to risks and implementation of new controls. The Group risk register is also reviewed by the Risk Committee on an annual basis.

The Group control register records ownership of each control. The RCSA process also requires the control owner to self-assess the effectiveness of controls at least annually. Any record of the control not being effective requires a narrative explanation and an action plan to restore effectiveness.



The RCSA process is facilitated and overseen by the risk management function, and the results are summarised and presented to Risk Committee, including progress against agreed actions to address themes and issues identified.

The Internal Audit Function assesses the operating effectiveness of controls on a periodic basis.

Compliance Function

The Board of Monument Re retains ultimate responsibility for compliance within the Group, and has delegated the day-to-day responsibility to the Group Compliance Function (“GCF”) to ensure that the operations are carried out in accordance with all legal and regulatory requirements. The GCF has been established in proportion to the nature, scale and complexity of the business carried on by the Group, and to assist with the monitoring and evaluation of compliance with laws, regulations, internal controls, policies and procedures.

The Board has nominated the Group General Counsel (“GC”), as the Compliance Officer, to be responsible for and to provide leadership to the GCF. The GC is to carry out these responsibilities in accordance with the laws and regulations of Bermuda, including but not limited to, the Act, The Insurance Code of Conduct, the Group Supervision Rules, and the Bermuda Companies Act 1981. The GC is also responsible to ensure that all regulated subsidiaries within the Group are in compliance with the laws and regulations of the countries in which they carry on business.

The Audit and Compliance Committee (“ACC”), under delegated authority from the Board of Monument Re, provides oversight, review, challenge and monitoring of all compliance activities pursuant to the ACC Terms of Reference (as amended from time to time). The ACC has the duty to ensure that there are procedures in place for an independent investigation of issues of non-compliance, if appropriate, and for appropriate follow up action.

Following an application by the Company, in July 2017, the BMA made a preliminary determination to designate the Company to be the Designated Insurer in respect of the Monument Re Group. This preliminary determination was made subject to satisfaction of a condition that the Company’s balance sheet be the largest in the Group. In January 2018, the BMA made its final determination on its role as a supervisor of the Monument Re Group, and designated the Company as the Designated Insurer, pursuant to section 27B(5) of the Insurance Act 1978.

Group supervision is carried out by the BMA within a comprehensive legislative framework, which includes, but is not limited to:

- The Act;
- The Group Supervision Rules;
- The Group Prudential Standards; and
- The Guidance Note.

According to the Guidance Note, the BMA has adopted an approach to supervision that combines both direct and indirect supervision. Monument Re, as Designated Insurer, is the lead insurer for the members of the Monument Re Group. As Designated Insurer, Monument Re must act in an early warning role. This allows the BMA to administer Group supervision in an effective and timely manner. One of the key evidences of fulfilment of the duties of the Designated Insurer was for Monument Re to establish organisational, governance and communications structures at the Group level.

In addition to quarterly and annual reporting, consistent with a Solvency II equivalent jurisdiction, the BMA has the power under the legislative framework to (i) compel production of information, documents or reports; and (ii) issue directions to Monument Re with respect to compliance by the Group with the Act, the Group Supervision Rules, and the Group Prudential Standards.



Monument Re is obliged, and complies with the requirement, to maintain a register of every entity within the Group. Further, the Company is required to report any changes in various particulars of Group companies, including the name and address of other competent authorities supervising other members within the Group.

B.5 Internal Audit

The Internal Audit Function (“IAF”) assesses the operating effectiveness of controls on a periodic basis. The Company’s Internal Audit Function is performed by the Group Head of Internal Audit and is governed by an internal audit charter.

The IAF assists the Company to accomplish its objectives by bringing a systematic and disciplined approach to evaluating and improving the effectiveness of the risk management control and governance processes. The objective of Internal Audit is to assist the ACC in the effective discharge of the ACC’s responsibilities as defined by the ACC Terms of Reference. This includes:

- Provide management and the ACC with independent, objective analysis, appraisals, recommendations and pertinent comments designed to add value and improve the Company’s operations;
- Provide management and the ACC with an independent appraisal function to assess the Company’s internal control and operating environment so as to provide reasonable assurance to assist them in concluding whether:
 - Financial reporting is reliable;
 - Operations are effective and efficient;
 - Compliance with laws and regulations; and
 - Assets are appropriately safeguarded.
- Provide an annual assessment to the ACC and management on the overall condition of the Company’s internal control environment based on conducting a risk based internal audit program, which includes reviewing the internal controls over financial reporting, operational controls, and fraud and risk management controls deemed necessary for such an assessment.

The function maintains its independence and its objectivity from the business it reviews by not participating in the Company’s operational activities and by adhering to the Board’s instruction on the function and the Institute of Internal Auditor’s Standard according to the International Professional Practices Framework.

The IAF activities are free of influence by any element in the organisation, including matters of audit selection, scope, procedures, frequency, timing, or report content to permit maintenance of an independent and objective mental attitude necessary in rendering reports.

Internal auditors have no direct operational responsibility or authority over any of the activities they review. Accordingly, they do not develop nor install systems or procedures, prepare records, or engage in any other activity that would normally be audited.

The Head of Internal Audit reports directly to the ACC for oversight matters and is responsible to the Group CEO for operational and day-to-day management.

B.6 Actuarial Function

The Company’s Group Chief Actuary is responsible for the actuarial function. The key roles and responsibilities of the actuarial function include:



- Delivery of actuarial reporting, bases, valuation models and corresponding processes for EBS and UK GAAP reporting on a Group consolidated basis, as well as stand-alone reporting requirements under local regulatory rules;
- Implementation of processes to deliver robust monitoring of capital, liquidity and solvency positions on an ongoing basis including monitoring of reinsurance arrangements;
- Completion of actuarial regulatory reporting requirements;
- Review of reinsurance transactions, acquisitions and retrocession from a capital, solvency and actuarial perspective to ensure transactions meet hurdle requirements and capital implications are well understood;
- Ensuring a robust asset liability matching framework that effectively manages investment risks within the risk appetites and tolerances of the Group in conjunction with the CIO; and
- Contribution to the effective implementation of the Risk Management Framework.

The actuarial function provides oversight to the local actuarial functions to ensure they adopt consistent standards while meeting local regulatory requirements.

The EBS Technical Provisions are independently reviewed by the Group Approved Actuary to ensure that they meet the following:

- The requirements of the Insurance Act 1978 and related rules and regulations; and
- Make reasonable provision for the Technical Provisions of the Group under the terms of its insurance contracts and agreements.

Group entities have equivalent independent reviews by local approved actuaries, in line with local regulatory and reporting requirements.

The Board receives an annual report from the Group Approved Actuary, which includes the results of the tasks undertaken, clearly identifying any deficiencies and giving any recommendations as to how such deficiencies could be remedied. The Group Approved Actuary operates under the ultimate responsibility of, and reports to the Board and, where appropriate, cooperates with the other key functions in carrying out its role. It is objective and free from the influence of other functions or the Board. It provides its opinions in an independent fashion and is able to communicate on its own initiative with any staff member, or Board member, and obtains access to any records necessary to carry out its responsibilities.

B.7 Outsourcing

Monument Re has defined a number of principles that underpin its outsourcing policy:

- The Group's outsourcing strategy shall not unduly increase the Group's exposure to Operational Risk;
- Outsourcing agreements shall be monitored and reviewed to ensure that outsourced activities are conducted in adherence to terms set out in outsourcing agreements and to applicable regulatory requirements; and
- Reporting processes shall be in place to ensure outsourcing performance is managed in line with outsourcing agreements and the Group's strategy.

Monument Re and its subsidiaries aligns the management of outsourcing arrangements in line with the "Three Lines of Defense" model. The Company retains oversight and clear accountability for all externally out-sourced functions. Monument Re has a strong interest in building-up and increasing in-



sourced functions over time, as the business grows.

The Board has ultimate responsibility for all out-sourced functions, and the Risk Committee has responsibility to agree and monitor all outsourcing agreements.

Monument Re has implemented a selection and due diligence process for the selection of external vendors and third-party supply arrangements that is consistent with the principles defined above. These service providers are selected after a due diligence process comparing services provided, experience, reputation, costs, and a number of other factors.

Investment service providers, including mandates and guidelines, are recommended to the Investment Committee for approval by the ExCo. The relationships with investment service providers are overseen by the CIO who regularly reviews the performance under each arrangement and reports back to the ExCo and Investment Committee. This due diligence is applied and maintained so that those individuals providing the external service to Monument Re are 'Fit and Proper' in accordance with the outsourcing policy and regulatory requirements.

A business owner is assigned responsibility for management and monitoring of each supplier. The business owner's responsibilities include managing the relationship and monitoring the performance and quality of service provided against agreed service levels.

A number of outsource service providers are used across the Group providing services including, but not limited to, policy servicing and administration, information technology systems and actuarial and accounting support.

Monument Re also outsources its investment management and other investment related services to third-party service providers. This includes investment management, custodian services, risk analytics, and investment accounting. Portfolios are managed by reputable third-party investment managers whose particular focus is on insurance asset management and who have expertise in the investment sectors we have allocated to.

Monument Re has an in-sourced master services agreement with MISL to provide defined support for Group functions, as deemed necessary.

B.8 Other Material Information

The system of governance is considered appropriate for the Company and there is no other material information to be provided.



C. Risk Profile

C.1 Material Risks

The Company uses a series of techniques to assess risks within the Company, as described below.

Annual Risk and Control Self-Assessment

As noted in section B.3, on an annual basis the risk owners carry out an RCSA to identify material inherent risks and to assess controls.

Risk Limits

The Company has established a series of limits and early warning thresholds aligned to risk appetite that are used to measure and monitor risk exposure and drive timely decision-making and actions. The Risk Committee is regularly apprised of exposures relative to limits and early warning thresholds.

Solvency Self-Assessment

All material risks are assessed quantitatively and/or qualitatively as part of the annual solvency self-assessment. Stress testing is used as part of the process to assess risk exposures and risk mitigation. This process is discussed further in B.3.

The table below sets out the material risks to which Monument Re is exposed along with risk mitigations in each case:

Table 10: Material Risks

Risk	Description	Mitigating Actions and Controls
Market Risk	The risk of loss or other adverse impact on the Group arising from movements in markets (e.g. exchange rates, interest rates and inflation rates).	<p>Investment policy and derivatives and hedging policy requiring mitigation of currency, interest rate and inflation risk to within Board approved asset-liability management limits.</p> <p>Regular monitoring of exposures relative to market risk limits, supplemented by stress and scenario testing.</p> <p>Risk is measured using standard metrics such as “DV01”, the sensitivity of asset and liability values to changes in market variables.</p>
Insurance Risk	The risk of loss or other adverse impact on the Group arising from unexpected fluctuations in the timing, frequency or severity of insured events, or timing and amount of claim settlements and expenses.	<p>Regular monitoring of actual versus expected claims and expenses.</p> <p>Regular review of actuarial assumptions.</p> <p>Management of persistency through high quality customer service.</p> <p>Selective use of reinsurance.</p> <p>Risk is measured principally through sensitivity tests to key assumptions, and stress and scenario testing.</p>
Credit Risk	The risk of loss or other	Credit risk policy imposing principles and requirements



Risk	Description	Mitigating Actions and Controls
	adverse impact on the Group arising from one party to a financial instrument failing to discharge an obligation.	<p>for credit risk management, and investment policy imposing credit ratings limits for investment counterparties and concentration limits to avoid overexposure to any investment counterparty.</p> <p>Regular monitoring of exposures relative to credit risk limits.</p> <p>Key risk measures include exposure by credit rating, risk concentration and sensitivity of asset values to movements in credit spreads.</p>
Operational Risk	The risk of loss or other adverse impact on the Group arising from inadequate or failed internal processes, personnel or systems or external events.	<p>Outsourcer oversight framework, outsourcing policy and operational risk policy.</p> <p>Regular RCSA process.</p> <p>Event and issue management process, root cause analysis and learning from adverse experience.</p> <p>Oversight exercised by Internal Audit, Risk and Compliance functions.</p> <p>Risk is measured using scenario analysis, operational event data, operational performance data including outsourcer performance metrics, and deep dives including due diligence on new outsourcers.</p>
Liquidity Risk	The risk of loss or other adverse impact on the Group arising from insufficient liquidity resources being available to meet obligations as they fall due.	<p>Liquidity policy imposing close matching of asset and liability cash flows and prudent restrictions on investment in illiquid assets.</p> <p>Liquidity framework requiring forward-looking assessment of liquidity requirements, including those arising from derivatives and reinsurance collateral mechanisms, and maintenance of a liquidity buffer to cover severe market and demographic stress.</p>
Group Risk	The risk of loss or other adverse impact on the Group arising from financial or non-financial relationships between entities within the Group. This includes reputational, contagion, accumulation, concentration and intra-Group transactions risk.	<p>Group risk policy imposing requirements for group risk management.</p> <p>Significant commonality of Board composition across the Group and its subsidiaries.</p> <p>Close scrutiny of intra-group transactions including external specialist input where appropriate.</p> <p>Stress and scenario testing through solvency self-assessment process.</p> <p>Reputational risk policy and escalation process.</p> <p>Risk is measured qualitatively and quantitatively e.g. via stress and scenario testing of adverse scenarios</p>



Risk	Description	Mitigating Actions and Controls
		across the Group as part of the solvency self-assessment process.
Strategic Risk	The risk of loss or other adverse impact on the Group arising from failing to identify and react appropriately to opportunities and/or threats arising from changes in the market, some of which may emerge over a number of years.	<p>Strategic risk policy imposing requirements for strategic risk management.</p> <p>Board members and executive committee members with broad experience and deep industry knowledge.</p> <p>Rigorous due diligence process led by internal experts with support from external specialists as required.</p> <p>Tried-and-tested integration approach and experienced, skilled integration team.</p> <p>Emerging risk analysis and reporting.</p> <p>Strategic risks are measured qualitatively.</p>
Sustainability Risk	The risk of loss or other adverse impact on the Group arising from environmental, social and governance risks, or the risk of adverse social or environmental externalities arising from the activities of the Group.	<p>The Group continues to enhance mitigation of sustainability risks, including transition risk, physical risk and direct impact, through a series of initiatives including:</p> <p>Assessing the environmental, social and governance (“ESG”) characteristics of the group’s investment portfolio, and building ESG considerations into investment decisions.</p> <p>Promoting low carbon practices e.g. video-conferencing in preference to business travel.</p> <p>Providing opportunities for and promoting community investment.</p>

There remains uncertainty regarding the final legal and regulatory arrangements to be determined as a result of the United Kingdom’s vote to leave the European Union. The Group serves its UK customers through Irish entities and the operational impact of Brexit is expected to be limited for the Group. The Group continues to keep abreast of ongoing developments and update its planning to take account of significant changes in the course of Brexit.

Material changes over the reporting period

Sustainability risk was included as a new risk category in 2019. Within the eight risk categories, several risks and mitigants have been added as a result of the growth of the Group through acquisitions and portfolio transfers.

The quantum of risk borne by the Company has increased, as reflected in the increase in capital requirements over the reporting period. Capital resources remain substantially in excess of requirements plus the capital management buffer, with the capitalisation of the Group set to provide capacity for future growth.



C.2 Risk Mitigation

Risk mitigation for each material risk has been provided in section C.1.

C.3 Risk Concentrations

At 31st December 2019, Monument Re held cash balances with a number of global banks. The largest single exposure was €48.1m with an A rated bank. Monument Re has investments in a number of money market funds. At 31st December 2019, the largest aggregate exposure to a single money market fund was €121.4m. The underlying investments are well diversified and the fund has an AAA credit rating.

Concentration risk is mitigated by the establishment of sector and issuer limits and minimum credit ratings as outlined in the investment policy.

At 31st December 2019, Monument Re held investments in a mortgage fund totalling €69.6m and mortgages directly written by a subsidiary of €22.1m.

On the liability side, there is concentration in certain product categories, including payment protection insurance, term assurance, guaranteed savings and unit-linked savings. However, the policy size and policyholder base is well diversified.

C.4 Prudent Person Principle

Monument Re adheres to the prudent person principle in the implementation of its investment strategy. This is accomplished through an investment framework focused on governance, risk assessment and portfolio diversification.

The Company governance structure is outlined in section B.1 of this report. In summary, the Board of Directors, as advised by the Investment Committee and ExCo, establish and oversee the investment strategy. This structure includes a robust reporting process between ExCo and the Investment Committee with frequent communication between the key internal resources responsible for the investment function and third-party investment service providers.

Monument Re continually assesses the risks associated with its business objectives, particularly those related to the investment portfolio, and determines which risks to accept and which to mitigate, in accordance with the risk appetite established by the Board. This is encompassed within the Risk Management Framework, as outlined in section B.3, and is manifested in the Company's risk policies. This risk assessment has led the Company to structure the investment portfolios primarily in investment grade, fixed income assets with a closely matched duration and cash flow profile to the liabilities that they support.

One of the key risk mitigants is to diversify the investment portfolios. This is achieved through documentation of guideline limits in the investment policies and ensuring that third-party investment service providers adhere to these limits. Specific exposure limits are established for investment sector, issuer and credit ratings. For each mandate, the Company oversees compliance of the service providers against the limits through a regular review of each portfolio. As noted above, the governance framework establishes reporting protocols for policy compliance.

Counterparty credit risk is principally controlled through the investment policy that imposes minimum credit ratings for investment counterparties and concentration limits to avoid overexposure to any investment counterparty. Investments are placed with international financial institutions subject to credit rating and other limits.



C.5 Stress Testing

Stress testing has been carried out on the business in force at the reporting date, as set out below.

Table 11: Stress Descriptions

Risk	Stress Description
Interest Rate Risk	100 basis points (bps”) parallel shift up and down in interest rates
Spread Risk	50 bps increase in spreads
Currency Risk	10% appreciation in reported currency (EUR) relative to other currencies
Equity Risk	20% fall in equity prices
Disability Risk	35% increase in disability rates applied over the contract boundary period and a 20% decrease in recovery rates
Unemployment Risk	40% increase in claim frequencies applied over the contract boundary period and a 20% decrease in claim termination rates
Lapse Risk	Two stresses have been performed: 1) A 10% permanent decrease in lapse rates; and 2) A 10% mass lapse
Mortality Risk	15% permanent increase in mortality rates
Longevity Risk	20% permanent decrease in mortality rates
Expense Risk	10% increase in expenses and a 1% increase in expense inflation per annum

The following table shows the quantified impacts of these stresses (rounded to the nearest €10k).

Table 12: EBS Stress Impacts

Sensitivities	Change in Available Capital (€'000)	EBS Capital Coverage Ratio (%)	Change in EBS Capital Coverage Ratio (%)
Base	-	474%	-
Interest Rate Up Risk	(14,100)	450%	-24%
Interest Rate Down Risk	12,340	495%	21%
Spread Risk	(1,110)	472%	-2%
Currency Risk	(10,560)	456%	-18%
Equity Risk	(3,220)	468%	-6%
Disability Risk	(170)	473%	-1%
Unemployment Risk	(50)	474%	0%
Lapse Down Risk	1,650	477%	3%
Mass Lapse Risk	1,560	476%	2%
Mortality Risk	9,220	489%	15%
Longevity Risk	(12,300)	453%	-21%
Expense Risk	(27,860)	426%	-48%



Interest Rate Risk

Movements in interest rates impact the value of fixed interest assets, interest rate swaps and policyholder liabilities. The Group mitigates this risk by holding assets (including interest rate swaps) with a similar sensitivity to interest rate changes to its liabilities. Limits are set around the net exposures.

At the reporting date, a 100 bps increase in interest rates would reduce the Company's net assets by €14.1m. Monument Re has no appetite for interest rate risk and the resulting exposure and the Company hedges its interest rate exposure to the local solvency basis.

Movements in interest rates impact the variation margin required on interest rate swaps. At the reporting date, a 100 bps increase in interest rates would give rise to a €30.4m increase in variation margin that Monument Re would need to post to the counterparty.

Credit Spread Risk

At the reporting date, Monument Re had a circa €1bn portfolio of government bonds, corporate bonds and mortgage fund investments. Movements in spreads impact the market value of these fixed interest assets. At the reporting date, a 50 bps increase in spreads would reduce the Company's net assets by €1.1m.

Currency Risk

The Group recognise two forms of currency risk:

- Currency risk where there is a mismatch between assets and liabilities by currency ('Currency Mismatch Risk'). The Company has very low risk appetite for this risk and mitigates currency risk by matching policyholder liabilities with assets denominated in the same currency; and
- Reporting risk when translating the financial results into the reporting currency, EUR ('Currency Translation Risk').

At the reporting date, the Company had limited exposure to Currency Mismatch Risk. This exposure is largely as a result of the Company's expenses being denominated in EUR and GBP whilst the fund management charges to cover these expenses are based on underlying assets denominated in other currencies (with particular exposure to USD).

The Company also had some exposure to Currency Translation Risk as a result of holding surplus assets in GBP and USD. The reporting risk arising from fluctuations in GBP and USD assets to the EUR exchange rate is an accepted risk for Monument Re.

The Company's main exposures to Currency Mismatch and Translation Risk at the reporting date are provided below:

- A 10% appreciation in EUR relative to USD would reduce the Company's net assets by €2.2m (\$2.7m).
- A 10% appreciation in EUR relative to GBP would increase the Company's net assets by €0.3m (£0.3m).
- A 10% appreciation in EUR relative to SEK would reduce the Company's net assets by €1.1m (SEK11.5m).
- A 10% appreciation in EUR relative to NOK would reduce the Company's net assets by €0.5m (NOK4.9m).



- A 10% appreciation in EUR relative to DKK would reduce the Company's net assets by €0.6m (DKK4.4m).

Equity Risk

The Company has indirect exposure to equity risk through unit-linked policies where the investor bears the investment risk. This exposure arises because fund charges, a source of income for the Company, depend on future performance of the unit-linked funds. These funds are typically invested in a mixture of asset classes, including equities. However, the Company manages this risk exposure via the use of equity options.

At the reporting date, the impact of a 20% fall in equity prices would reduce the Company's net assets by €3.2m.

Disability Risk

The Company is exposed to an increase in rates of disability. At the reporting date, a 35% increase in disability rates applied over the contract boundary period and a 20% decrease in recovery rates gives rise to a reduction in the Company's net assets of €0.2m.

Unemployment Risk

The Company is exposed to an increase in unemployment rates, under the terms of its payment protection insurance contracts. At the reporting date, a 40% increase in claim frequencies applied over the contract boundary period and a 20% decrease in claim termination rates, leads to a reduction in the Company's net assets of €0.1m.

Lapse Risk

The direction of lapse risk varies according to the line of business. Typically, a decrease in lapses is onerous for the Company on long term savings business which have in-the-money interest rate guarantees; whereas, an increase in lapses is typically onerous on unit-linked business, owing to the loss of future profits (within the relevant contract boundary) arising from the excess of management fees over expenses. On balance, the overall exposure is not material:

- A 10% permanent decrease in lapse rates would increase the Company's net assets by €1.7m.
- A 10% mass lapse would decrease the Company's net assets by €1.6m.

Mortality Risk

The Company's exposure to mortality risk varies according to the line of business. This stress represents the aggregate impact across all lines of business.

At the reporting date, a 15% permanent increase in mortality rates would lead to an increase in the Company's net assets of €9.2m.

This impact is dominated by the annuity policies, which produce a benefit following higher than expected mortality.

Monument Re does have some exposure to protection business, most noticeably a portfolio of credit life business in Belgium. However, mortality risk on the other protection portfolios are heavily reinsured.

The Company also has indirect exposure to higher than expected mortality owing to the loss of future profits (within the relevant contract boundary) arising from the excess of management fees over expenses on unit-linked business. However, this is not material.



Longevity risk

Longevity risk mainly arises from annuity policies since the Company has exposure to policyholders living longer than expected.

At the reporting date, a 20% permanent reduction in mortality rates would lead to a reduction in the Company's net assets of €12.3m.

Expense risk

At the reporting date, a 10% increase in expenses coupled with a 1% increase in expense inflation per annum, would lead to a reduction in the Company's net assets of €27.9m.

In reality, the Company would take reasonable management actions to manage this assumption, which have not been reflected here.

C.6 Other Material Information

The risk exposures of the Group are expected to change as the Group continues to pursue its growth strategy through acquisition and reinsurance.



D. Solvency Valuation

D.1 Assets

Asset Overview

The Group's investments are predominantly held in bonds, cash & cash equivalents and mortgage funds and loans. These balances make up a significant proportion of the Company's assets at the reporting date. The remaining assets comprise of amounts owed from other Group companies and trade debtors. Most of the investments are fair valued using quoted market prices in active markets where available or observable inputs. Debtors and cash, which are held at cost, are revalued for exchange rate movements.

The table below summarises the valuation of the Company's assets at 31st December 2019 and 2018.

Table 13: Asset Portfolio

Figures in €'000	31 st December 2019	31 st December 2018
Cash & Cash Equivalents	281,236	137,558
Investments and Funds Withheld	1,057,935	395,534
Assets covering Unit-Linked Liabilities	987,233	507,462
Insurance & Intermediaries' Receivables	4,213	2,185
Other Assets	64,247	30,931
Total Assets	2,394,864	1,073,670

The EBS basis has certain prudential filters that must be applied under BMA regulations. This means that the assets reported on an EBS basis are lower than the assets presented in the Company's financial statements. Specifically, this relates to removing prepayments and deferred expenses in relation to successful new business that have been capitalised against future transactions.

During 2019, the Company obtained the required approvals to effect the portfolio transfer from MetLife to Monument Life. This transaction was initially accounted for as reinsurance on a funds withheld basis. Assets covering unit-linked liabilities in the above table at 31st December 2019 include the remaining asset of €46.8 million on a funds withheld basis which is expected to be transferred to Monument Life in 2020 (2018: €293.6m).

Cash & Cash Equivalents, Investments and Funds Withheld

Cash & cash equivalents are measured at amortized cost using the effective interest method. Investments are measured at fair value and the changes in fair value are recognised in profit or loss.

The funds withheld account represents a receivable for assets held by ceding companies in accordance with reinsurance agreements in which the Company acts as the reinsurer. The assets withheld by the ceding company are legally owned by those companies, however the assets are legally segregated from other accounts of the cedants and all economic rights and obligations on the underlying assets accrue to Monument Re. The asset is recorded at fair value determined based on the fair value of the assets held on the Monument Re's behalf by the ceding company.



A split of the investment assets by type and credit quality within the Group is provided below:

Table 14: Investments by Credit Rating

Figures in €'000	31 st December 2019						
	AAA	AA	A	BBB	BB	Not rated	Total
Bonds	266,414	192,251	129,436	232,547	15,657	24,709	861,014
Mortgage Funds and Loans ⁴	-	91,738	-	-	-	-	91,738
Derivatives	(7,153)	1,265	235	(229)	-	-	(5,882)
Equity Mutual Fund ⁵	-	-	-	-	-	91,123	91,123
Other	-	-	-	-	-	472	472
Total Investments	259,261	285,254	129,671	232,318	15,657	116,304	1,038,465
Proportion	25%	27%	12%	22%	2%	11%	100%

Figures in €'000	31 st December 2018						
	AAA	AA	A	BBB	BB	Not rated	Total
Bonds	24,127	80,048	83,728	102,192	9,602	-	299,697
Mortgage Funds	-	62,007	-	-	-	-	62,007
Derivatives	1,688	-	2,811	-	-	-	4,499
Other	-	-	-	-	-	353	353
Total Investments	25,815	142,055	86,539	102,192	9,602	353	366,556
Proportion	7%	39%	24%	28%	3%	0%	100%

Figures in the tables above exclude cash & cash equivalents (including cash and accrued interest within funds withheld assets in respect of the MetLife portfolio), policyholder loans and term deposits.

Assets covering Unit-Linked Liabilities

Assets covering unit-linked liabilities relate to unit-linked investment contracts and include primarily investments in funds. These assets are measured at fair value at each reporting date.

Insurance & Intermediaries' Receivables

Insurance & intermediaries' receivables are valued at their estimated transaction price i.e. the premium that is expected to be received from policyholders and intermediaries.

Other Assets

Other assets consist of other trade debtors valued at their transaction price and due within one month

⁴ Includes €22.1m of direct mortgages held by Robein.

⁵ Relates to a portfolio of variable annuity policyholder assets. For BSCR purposes, these are treated as unit-linked assets.



of the reporting date.

Deferred Expenses and Prepayments

Deferred expenses and prepayments are permissible under UK GAAP but not under EBS. The Group capitalises expenses incurred to the end of the reporting period that are directly related to successful new business efforts within the balance sheet.

Other Material Differences

There are no other material differences in the bases, methods and assumptions used between EBS and the financial statements.

D.2 Technical Provisions

Technical Provisions Overview

Technical Provisions are calculated as the sum of the Best Estimate Liabilities (“BEL”) and Risk Margin, calculated in line with the EBS valuation principles, as defined in the BMA’s Group Prudential Standards and Guidance Note for Commercial Insurers and Groups (dated 30th November 2016).

The table below contains the Technical Provisions for Monument Re as at 31st December 2019 and 2018.

Table 15: Technical Provisions

Technical Provisions (€’000)	31 st December 2019	31 st December 2018
Gross Best Estimate Liabilities	2,025,053	805,668
Reinsurance Asset	(3,324)	(8,890)
Net Best Estimate Liabilities	2,028,376	814,557
Risk Margin	28,637	6,833
Technical Provisions	2,057,013	821,391

The valuation and amount of the financial statement liabilities and the EBS Technical Provisions are equivalent. Note that the financial statements are grossed up for reinsurance. That is, the financial statement assets and liabilities include the gross assets and liabilities, plus the reinsurance assets and liabilities. EBS Technical Provisions are reported net of reinsurance.

The liabilities presented above include non-linked and unit-linked business.

Methodology

The BEL is based on an assessment of best estimate cash flows required to satisfy insurance obligations. The cash flow projections used in the calculation of the best estimate take into account of all future cash inflows and outflows required to settle the insurance obligations attributable to the lifetime of the policy, subject to contract boundaries where applicable.

Contract boundaries are deemed applicable where, under the terms and conditions of the underlying contracts, the Company is no longer required to provide coverage or can reassess the premium to fully reflect the risk.

The BEL is calculated based on gross best estimate cash flows, without a deduction of amounts recoverable from reinsurance contracts. The best estimate of reinsurance recoverable amounts are calculated and shown separately, before being deducted to determine the reported net BEL.



The BEL is calculated deterministically on an individual policy-by-policy basis for all contracts in force at the reporting date. The only exception is the PPI portfolio, which has been grouped for operational reasons.

Best estimate cash flows are produced based on best estimate assumptions approved by the Board.

The best estimate cash flows are discounted using the discount curve methodology approved by the Board.

The Risk Margin is an allowance for the risk of uncertainty inherent in the best estimate cash flows and is intended to reflect the compensation that an insurer needs to bear this risk. A cost of capital approach is used to determine the Risk Margin by projecting the non-hedgeable BSCR's using appropriate risk drivers and discounting these cash flows using the BMA's prescribed risk-free curves. A cost of capital rate of 6% is applied to the cash flows, as prescribed by the BMA. The risk drivers used to project the non-hedgeable BSCR are deemed an appropriate representation of the projected BSCR.

Assumptions

An annual review is performed on the experience of the Company to determine the appropriateness of the demographic assumptions used in calculating the BEL.

The key assumptions underlying the calculation of the BEL at the reporting date are the lapse, expense and longevity rates.

Key assumptions are derived with reference to the Company's past experience, layering in expert judgement where applicable. The Company closely monitors its expense basis and uses historic experience and the budgeting process to determine the future expense provisions.

The discount rates used in the calculation of the Technical Provisions depend on the currency of the liabilities and the discount rate approach approved by the Board. For asset intensive business, the Company uses the Scenario Based Approach as described in the BMA's Guidance Note for Commercial Insurers and Groups (dated 30th November 2016), for all other business, risk-free rates are used.

Uncertainty Associated with the Value of Technical Provisions

Given the use of assumptions, there is inherent uncertainty. The level of uncertainty associated with the value of Technical Provisions has been estimated by examining how Available Capital would change if certain material assumptions were to change. These are quantified in section C.5.

D.3 Reinsurance

External Reinsurance

The Company cedes insurance premiums and risk in the normal course of business. Outwards reinsurance premiums are accounted for in the same accounting period as the related premiums for the direct reinsurance business being reinsured. Reinsurance assets include balances due from reinsurance companies for paid and unpaid losses, ceded unearned premiums and ceded future life policy benefits. Amounts recoverable from reinsurers are estimated in a manner consistent with the claim liability associated with the reinsured policy.

At the reporting date, reinsurance arrangements were in place across a number of local entities, as described below.

Monument Life has reinsurance treaties in place on its term life protection portfolio with two major reinsurers, SCOR Global Life SE ("SCOR") and Swiss Re Europe S.A. ("Swiss Re"), both rated AA- by Standard & Poor's ("S&P") and with a stable outlook. The reinsurance covers the mortality and morbidity risk whereby 90% of the Spanish business is reinsured and 80% of the UK business is



reinsured, both on a quota share basis.

Within the MetLife portfolio, Monument Life has a reinsurance treaty in place on a 100% quota share basis with MetLife Reinsurance Company of Bermuda Ltd. (non-rated), to cover the variable annuity guarantees.

MAB has a reinsurance treaty in place with SCOR, and the treaty reinsures 100% of the mortality and rider benefit risks on the AALCB portfolio.

MAL has financial reinsurance treaties with SCOR, Hannover Rück SE ("Hannover Re", rated AA-, S&P) and Deutsche Rück AG (Rated A+, S&P). This reinsurance was previously used to finance new business on an 85% original terms basis. Reinsurance remains in place and all reinsurers having a stable outlook. Surplus reinsurance also exists to cover exceptional risks i.e. higher sums insured for death or various riders including accident, death and disability cover.

Robein has a reinsurance treaty in place with Swiss Re on a surplus basis for death amounts over €25k.

Nordben has quota share reinsurance treaties in place on the death and disability risks for products in the with-profits fund split between the shareholder's fund, Mandatum Life Insurance Company Limited (rated A+ S&P, stable outlook, and Hannover Re on a quota share basis in the ratio of 5% / 85% / 10%. Hannover Re additionally provides surplus cover above the quota share limits.

There is no other external reinsurance in place.

Internal Reinsurance

As part of the Group strategy, the Company has effected internal reinsurance on the Ethias FIRST A and MetLife portfolios in Monument Life (Ireland), all portfolios in MAB (Belgium) and the Aspecta portfolio in MAL (Luxembourg). The strategy to reinsure risk internally allows the Company to manage its capital more efficiently while also pooling risk centrally to achieve an optimal diversified portfolio of risks.

D.4 Other Liabilities

The following table summarises the valuation of the Company's Other Liabilities (excluding Technical Provisions) for the years ended 31st December 2019 and 2018.

Table 16: Other Liabilities

Liabilities (€'000)	31 st December 2019	31 st December 2018
Insurance & Intermediaries Payables	21,421	12,612
Reinsurance Payables	6,697	7,337
Deferred Tax Liabilities	6,286	4,966
Other Liabilities	25,996	9,494
Total Other Liabilities	60,400	34,409

Insurance & intermediaries' payable are mostly represented by prepaid premiums and premiums taxes payable, claims payable, commission and profit share amounts payable. Commission payable is accrued for on a quarterly basis and settled within 15 days of the quarter end. Profit share payable is also accrued for on a quarterly basis but is settled annually in January.

Reinsurance payables mainly relate to payables from existing external reinsurance arrangements.

Deferred tax liabilities reflect expected future tax payables in the local jurisdiction. When calculating



a deferred tax liability, consideration is given to the net assets on the tax balance sheet compared to EBS Available Capital (or EBS net assets). Where EBS net assets exceed the net assets on the tax balance sheet, a deferred tax liability is required at the local tax rates applicable at the reporting date.

The remaining liabilities comprise accruals for expenses and taxes incurred but not yet settled. Trade and other creditors are also included and are valued at their respective transaction price, and deemed payable within three months after the reporting date.

D.5 Other Material Information

There is no other material information to be provided.



E. Capital Management

E.1 Eligible Capital

Capital Management Policy

Capital management and allocation is a key driver of the Group's success. Capital is a resource that supports the risk bearing capacity of the Company, forming a foundation for the Company's long-term viability and the trust of its customers. Effective Capital Management is a key element of the Group's strategy and ability to complete and acquire portfolios across different jurisdictions. The Group has a robust capital management policy, which governs the management of our capital resources to provide flexibility to execute new reinsurances and acquisitions, while maintaining financial strength ensuring policyholder and cedant security. An important element of this approach is to maintain financial flexibility by pooling capital at Monument Re, which brings diversification benefits as the business grows.

The primary objective of the Group is to ensure compliance with externally imposed capital requirements and to maintain appropriate capital ratios in order to protect the security of its stakeholders, including cedants and policyholders, while maintaining shareholder value.

As a Bermuda reinsurer, the Group's primary capital benchmark is to maintain sufficient EBS Available Capital to meet, at all times, the Enhanced Capital Requirement ("ECR"), adhering to the EBS framework.

The key principles of capital management at Monument Re are:

Monument Re Capital Management Principles

1) Target Setting

- Sufficient capital levels set by the Board, so that the Group is able to withstand appropriate stress scenarios, as approved by the Board
- The current Target Capital level for Monument Re is to maintain Available Capital equivalent to 150% of the ECR
- The Target Capital level for each subsidiary is approved by the relevant Board, taking into account local requirements

2) Monitoring

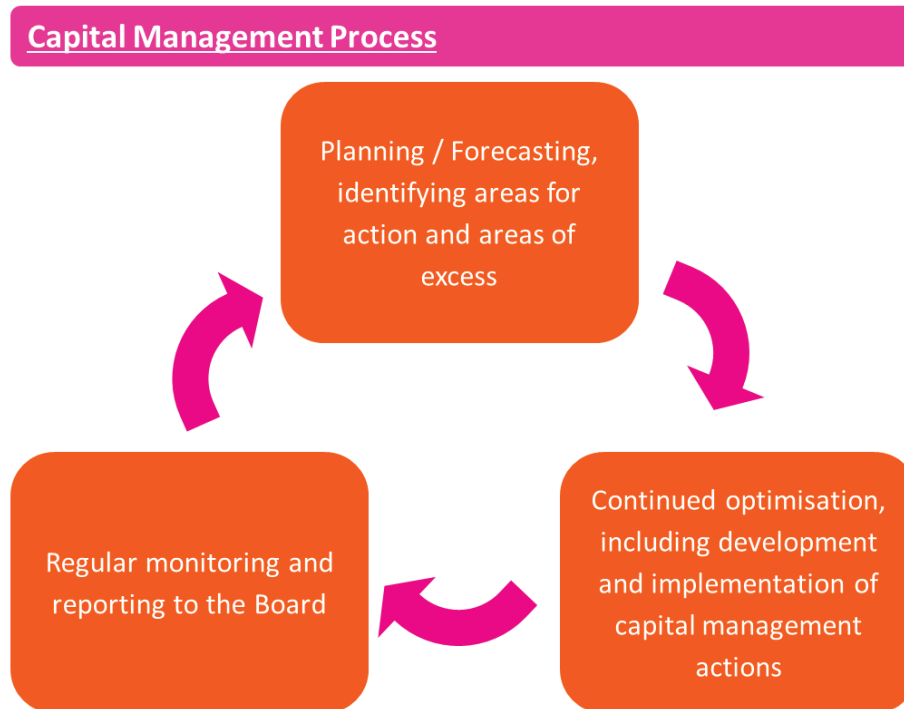
- Capital levels shall be assessed regularly to ensure that they remain appropriate to support the Group's operations
- Appropriate processes maintained to enable effective monitoring and reporting of capital positions across the Group including the impact of new transactions

3) Management Actions

- Activities undertaken to optimise the capital position of the company (and /or subsidiaries)
- Actions continuously identified and executed, in order to optimize capital and remedy breaches of capital levels should a breach occur



The process followed for Capital Management is depicted below:



A capital management plan is prepared annually with the business planning period covering five years. This process culminates in an assessment of the capital necessary to maintain solvency at the threshold targeted by senior management and the firm's risk profile. This plan is reviewed and updated on a regular basis to reflect the actual performance of the business. The policy is reviewed annually with the results of the annual GSSA process taken into consideration.

Categorisation of Eligible Capital

Available Capital is adjusted to reflect, where applicable, the limited accessibility of the assets. At the end of the reporting period, the Company's Eligible Capital was wholly categorised as Tier 1, as shown in the table below. This means that 100% of the Available Capital is used to support the ECR.

Table 17: Eligible Capital

Eligible Capital (€'000)	31 st December 2019	31 st December 2018
Tier 1	277,451	217,871
Tier 2	-	-
Tier 3	-	-
Total	277,451	217,871

Eligible Capital that is Subject to Transitional Arrangements

No Eligible Capital is subject to transitional arrangements.

Factors Affecting Encumbrances on the Availability and Transferability of Capital to Meet the ECR

There are no factors affecting encumbrances on the availability and transferability of capital to meet



the ECR.

Identification of Ancillary Capital Instruments Approved by the BMA

There was no ancillary capital at the reporting date.

Differences in Shareholder Equity as Stated in the Financial Statements versus the Available Capital and Surplus

There are no significant differences between UK GAAP Shareholder Equity and Available Capital.

The only differences relate to deferred expenses and prepayments, as set out in section D. Reinsurance is presented differently but the net impact on shareholder equity is zero.

E.2 Regulatory Capital Requirements

Enhanced Capital Requirement

The Company's regulatory capital requirement, also known as the ECR, is given below for the years ended 31st December 2019 and 2018:

Table 18: Enhanced Capital Requirement

Figures in €'000	31 st December 2019	31 st December 2018
Bermuda Solvency Capital Requirement	58,566	18,096
Minimum Solvency Margin	55,430	28,996
Enhanced Capital Requirement	58,566	28,996

The ECR is determined based on the maximum of the Minimum Solvency Margin ("MSM") and the BSCR.

Minimum Solvency Margin

The Group Supervision Rules require that the Company must ensure that the value of the Available Capital, as calculated in accordance with Schedule XIV of the Group Prudential Standards, exceeds the aggregate of:

- The aggregate MSM of each qualifying member of the Group controlled by Monument Re; and
- Monument Re's percentage shareholding in the member multiplied by the member's MSM, where the parent company exercises significant influence over a member of the Group but does not control the member.

A member is a qualifying member of the Group if it is subject to solvency requirements in the jurisdiction in which it is registered. The MSM for each qualifying member is given by the minimum solvency requirements, calculated in accordance with the local regulatory capital regime. The table below shows the MSM for each qualifying member of the Group.

**Table 19: Minimum Solvency Margin**

Entity (€'000)	31 st December 2019	31 st December 2018
MIDAC	3,070	3,520
MADAC	3,700	3,700
Monument Life	6,200	3,700
MAB	3,700	3,700
MAL	3,700	3,700
Robein	3,700	N/A
Nordben	5,612	N/A
Inora	3,700	N/A
Monument Re (Class E)	22,049	10,677
Monument Re (Group)	55,430	28,996

Monument Re (Class E) is subject to the MSM calculated in accordance with the Insurance Account Rules 2016. This requires Monument Re to calculate the MSM as the greater of:

- \$8m (€7m at the reporting date); or
- 2% of the first \$500m (€446m) of assets plus 1.5% of assets above \$500m.
- This is subject to a minimum floor of 25% of ECR.

For local entities, the MSM is given by the Minimum Capital Requirement (“MCR”) calculated in accordance with the Solvency II legislative framework, with the exception of Nordben, which is based on regulatory rules promulgated by the Guernsey Financial Services Commission. For Monument Re (Group), the MSM is given by the sum of all the local entities equivalent MSM’s.

Bermuda Solvency Capital Requirement

The BSCR is calculated at an individual risk level and is based on the methodology and capital charge calibrations prescribed by the Group Prudential Standards. The BMA has calibrated the BSCR capital charges to a 99% tail value at risk over a one-year time horizon.

The capital charges determine the required level of capital for each individual risk. These capital amounts are then aggregated and an adjustment is made for the covariance between all the risks to arrive at the diversified BSCR (before operational risk).

The risk modules in the BSCR regime include market, credit, property & casualty (“P&C”) insurance, long-term insurance and operational risk.

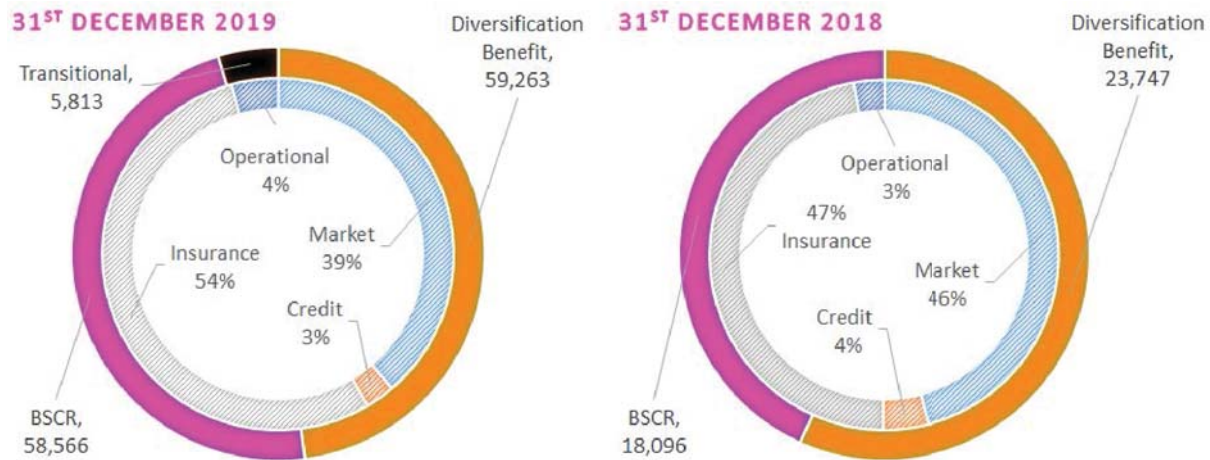
In assessing operational risk, the Company has performed a Commercial Insurer Risk Assessment (“CIRA”) to assess the quality of the Group’s risk management function surrounding its operational risk exposures, which determines the operational risk capital charge. Operational risk is then determined as a percentage of the diversified BSCR.

The BSCR regime is currently in a transition phase with the new capital regime coming into effect from 1st January 2019, replacing the previous capital regime. The transitional period for Monument Re is calculated as 9 years, and is based on the amounts of life and P&C BSCR at the reporting date. At 31st December 2019, the reported BSCR is based on 8/9th of the previous capital regime and 1/9th of the



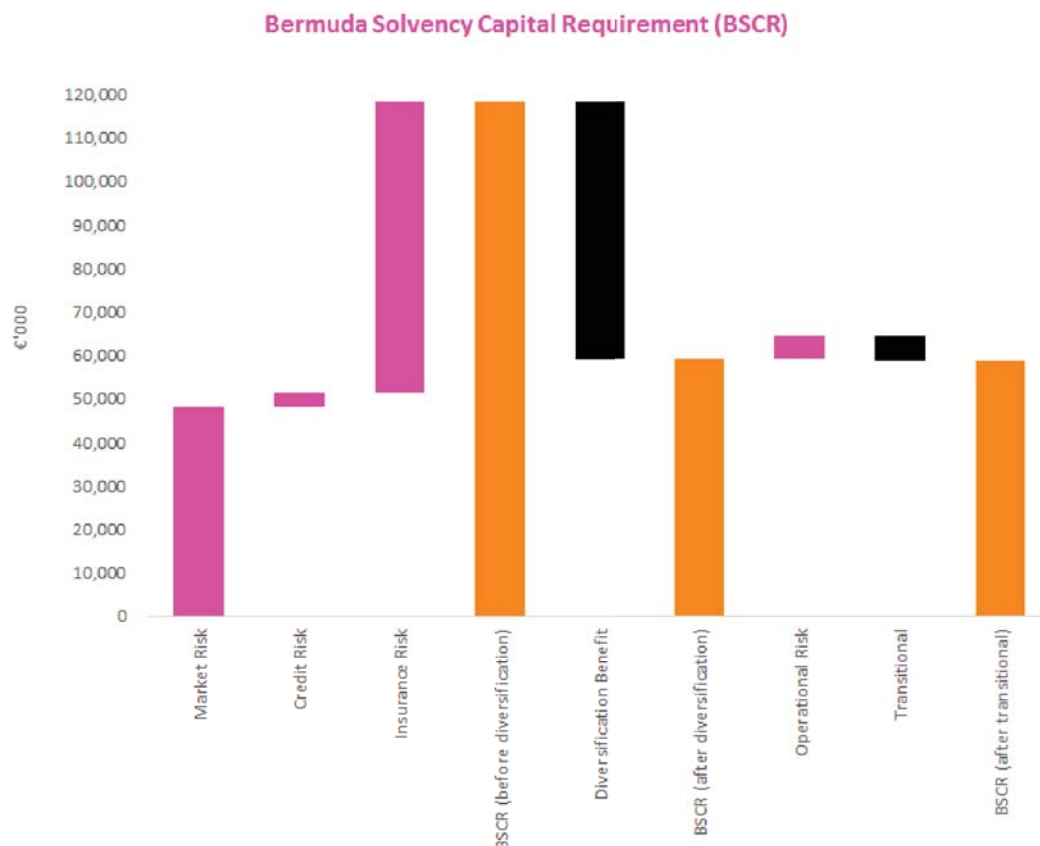
new capital regime.

The diagram below shows the BSCR for the Company at 31st December 2019 with a comparison against the previous reporting date, 31st December 2018. The BSCR has been shown split by risk module. The outer ring shows the total diversified BSCR, the level of diversification benefit realised within the Group and, where relevant, any transitional benefit in moving to the new capital regime. The inner ring shows each risk module as a proportion of total undiversified capital. Figures are in €'000.



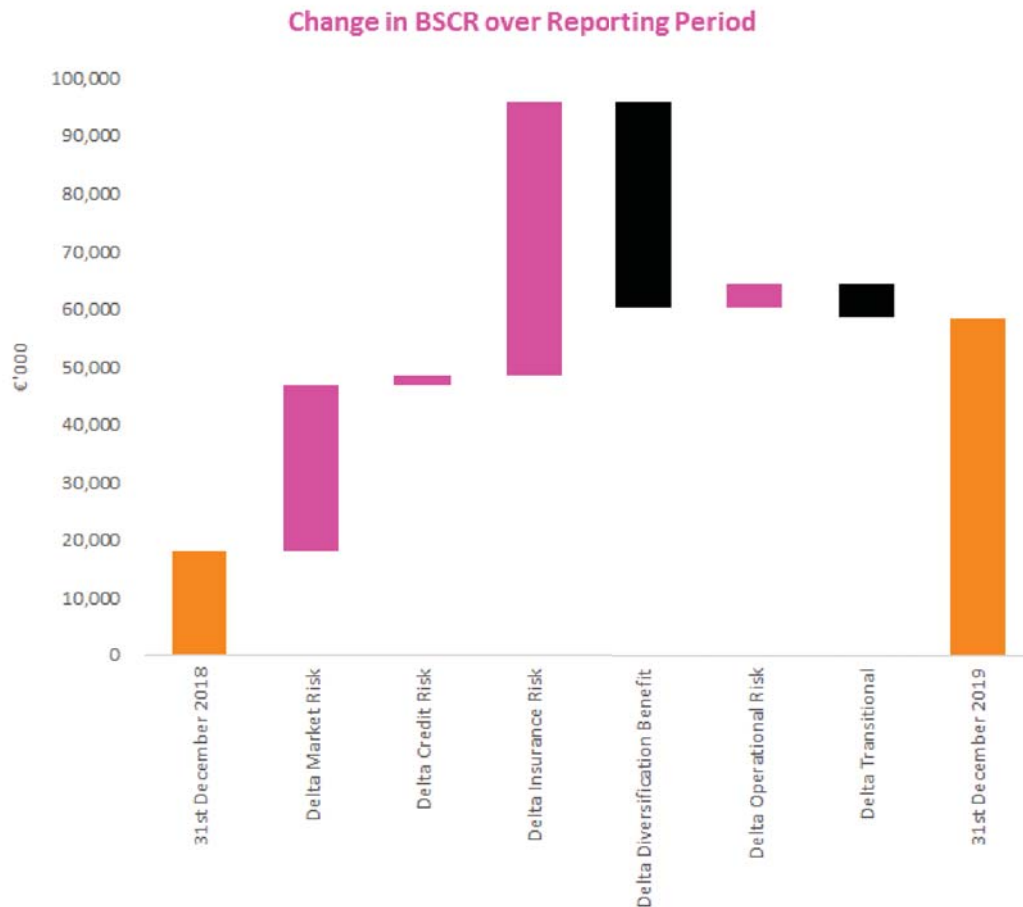
Through execution of the strategy, greater amounts of market and long-term insurance risk were placed onto the Group balance sheet over the reporting period, mainly through the completion of six new transactions.

The diagram below shows the BSCR split by risk module:





The change in BSCR over the reporting period is shown below, split by risk module:



Identification of Any Non-Compliance with the MSM and the ECR

The Company was compliant with the MSM and ECR requirement at the end of the reporting period.

Description of the Amount and Circumstances Surrounding the Non-Compliance, the Remedial Measures and Their Effectiveness

Not applicable.

Where the Non-Compliance is not Resolved, a Description of the Amount of the Non-Compliance

Not applicable.

E.3 Approved Internal Capital Model

Not applicable. The Company has not applied to use an internal capital model to determine its regulatory capital requirements.



E.4 Capital Coverage Ratio

The table below shows the EBS Capital Coverage Ratio ("CCR") of the Company for reporting periods ending 31st December 2019 and 2018.

Table 20: Capital Coverage Ratio

Figures in €'000	31 st December 2019	31 st December 2018
Available Capital	277,451	217,871
Enhanced Capital Requirement	58,566	28,996
Free Surplus	218,885	188,875
EBS Capital Coverage Ratio	474%	751%

At the reporting date, the EBS CCR significantly exceeds the minimum solvency target level set by the BMA (120% of ECR) and the minimum level set by the Board, as defined in the Capital Management Policy (150% of ECR).

The significant increase in Available Capital over the reporting period is largely driven by the completion of six transactions and a further capital contribution of €20.0m from Finco, the immediate parent company of Monument Re. The increase in ECR is mainly driven by the completion of six transactions over the reporting period, which more than outweighed the increase in MSM.



F. Significant Events

COVID-19

The novel coronavirus (COVID-19) outbreak has developed rapidly in 2020, with a significant number of infections reported across a wide range of countries and regions. At the date of approving this report the ultimate economic and social consequences of COVID-19 outbreak are uncertain. A pandemic may increase insurance claims, cause investment losses and disrupt business operations. Measures taken by various governments to contain the virus have also affected economic activity. Counterparty credit risk and liquidity risk may also increase.

The Group has a number of risk mitigations, as part of the general management of the business, which can be utilized to mitigate the potential impact of COVID-19. The Group is resilient to stress across each of these areas of risk, having regard to the risk mitigations as described in the Group's financial statements.

While it is not possible to identify the financial impact of COVID-19 on the Group's FCR, the sensitivities provided in section C.5 of this report provide an indication of the impact of changes in our key assumptions related to the areas of risk before considering the risk mitigations available. In addition, the Group maintains excess capital above its regulatory capital requirements, which are calibrated to a 1 in 200 year stress event.

It is noted that, consistent with the Group Audited Financial Statements, the Group FCR has been prepared on a going concern basis, which is relevant for the production of this report. At the date of signing this report, business continuity plans are in place with employees engaged in home working, collaborating via video conference and other electronic means. Whilst uncertain, the Company does not believe that COVID-19 results in a materially adverse effect on its ability to maintain operations and meet obligations as they fall due.

Transactions Pending Completion

Monument Re has signed agreements in respect of the following transactions below. The financial results of these transactions have not been included in this report because they remain subject to regulatory approval.

- On 10th December 2019, the Company signed the acquisition of Cattolica Life Designated Activity Company ("Cattolica") from Società Cattolica di Assicurazione Società Cooperative. Cattolica is a closed Irish entity which wrote unit-linked business on a cross-border basis in Italy. This transaction remains subject to customary closing conditions, including receipt of regulatory approval.
- On 21st March 2020, the Company signed an agreement to acquire GreyCastle Holdings Ltd ("GreyCastle") and its subsidiaries, which include GreyCastle Life Reinsurance (SAC) Ltd and GreyCastle Services, from the shareholders of GreyCastle Holdings Ltd. The closing of the transaction is subject to regulatory approval. GreyCastle is domiciled in Bermuda and is focused on managing a portfolio of annuity and life risks.

These transactions will have the following impacts on the Group FCR:

- Business and performance – The Company will expand its geographical presence in Bermuda and the United Kingdom.
- Governance structure – Risk management, internal controls and other functions and processes will be impacted.



- Risk profile – The risk profile will change on account of the acquisitions. It is expected that the transactions will introduce a greater proportion of market and life insurance risk, aligned to our strategy, which will allow the Company to further diversify its business.
- Capital management – The Company’s internal calculations indicate that it will be able to meet all regulatory requirements post acquisition and the Company will be in full adherence to its Capital Management Policy.

Change of Entity Name

On the 2nd April 2020, by a Special Resolution of the Company, and with the approval of the Registrar of Companies, Laguna changed its name to Monument Life Insurance Designated Activity Company (“Monument Life”). Monument Life is authorised in Ireland and regulated by the CBI.



G. Declaration

We declare that to the best of our knowledge and belief, the information in the Financial Condition Report fairly represents the financial condition of the Company in all material respects.

At the date of signing this report the ultimate economic and social consequences of the novel coronavirus (COVID-19) outbreak are uncertain. Business Continuity plans are in place and we are not seeing material impact on operations.

Dated: 18th May 2020

Manfred Maske, Group Chief Executive Officer

Dated: 18th May 2020

Alex Brogden, Group Chief Financial Officer



H. Glossary

Available Capital: Available Capital relates to the value of the Groups total statutory economic capital and surplus, as defined and calculated in accordance with Schedule XIV of the Group Prudential Standards. This is defined as the sum of:

- The Company's tier 1 capital, which shall be not less than 80% of the value of the Company's MSM; and
- The Company's tier 2 capital, which shall be not more than 25% of the amount above.

Bermuda Monetary Authority ("BMA"): The BMA is the integrated regulator of the financial services sector in Bermuda. Established under the Bermuda Monetary Authority Act 1969, the BMA supervises, regulates and inspects financial institutions operating in or from within the jurisdiction. It also issues Bermuda's national currency; manages exchange control transactions; assists other authorities in Bermuda with the detection and prevention of financial crime; and advises the Government and public bodies on banking and other financial and monetary matters. The BMA develops risk-based financial regulation that it applies to the supervision of Bermuda's banks, trust companies, investment businesses, investment funds, fund administrators, money service businesses, corporate service providers, and insurance companies. It also regulates the Bermuda Stock Exchange.

Bermuda Solvency Capital Requirement ("BSCR"): Establishes a measure of solvency capital that is used by the BMA to monitor the capital adequacy of insurance groups domiciled in Bermuda. The BSCR is determined by combining the calculated capital for each risk category (excluding operational risk) and applying a covariance adjustment with the square root rule, which is further adjusted to include operational risk, group-related risks and any capital add-ons.

The BSCR is determined as the required capital to be held by insurance and reinsurance undertakings in order to ensure that ruin occurs no more often than once in every 200 cases or, alternatively, that those undertakings remain in a position, with a probability of at least 99% tail value at risk, to meet their obligations to policyholders and beneficiaries over the following 12 months.

The BSCR regime is currently in a transition phase with the new capital regime coming into effect from 1st January 2019, replacing the previous capital regime. The transitional period for Monument Re is calculated as 9 years, and is based on the amounts of life and P&C BSCR at the reporting date. At 31st December 2019, the reported BSCR is based on 8/9th of the previous capital regime and 1/9th of the new capital regime.

Best Estimate Liability ("BEL"): The BEL represents the expected present value of future cash flows related to insurance and reinsurance obligations in force at reporting date. The best estimate liability is calculated on a gross and net of reinsurance basis, i.e. with and without a deduction for a recoverable amount from reinsurance contracts.

Best Estimate Demographic Assumptions: Non-market assumptions which can have an impact on future best estimate cash flows i.e. mortality, longevity, disability, morbidity, lapses and expenses.

Capital Coverage Ratio ("CCR"): Defined as the ratio between Available Capital and the ECR, calculated in accordance with the Group Prudential Standards under the EBS framework.

Cash & Cash Equivalents: This item includes cash, highly liquid short-term financial investments, short-term deposits and money market investment funds.

Contract Boundaries: This is the limit beyond which relevant cash flows are excluded from the calculation of the BEL. It is defined in paragraph 122 of the BMA's Guidance Note for Commercial Insurers and Groups Statutory Reporting Regime (dated 30th November 2016), and refers to the situation where the insurance undertaking has a right to either terminate the contract, reject payable



premiums or to amend the payable premiums or the benefits in such a way that the premiums fully reflect the underlying risks.

Economic Balance Sheet (“EBS”): Solvency II equivalent capital regime promulgated by the BMA.

Eligible Capital: Available Capital eligible to support the Company’s ECR.

Enhanced Capital Requirement (“ECR”): Maximum of BSCR and MSM.

Gross Written Premiums (“GWP”): Equal to the gross written premiums of direct business and accepted by third parties.

Insurance Contracts: A contract under which one party (the insurer) accepts significant insurance risk from another party (the policyholder) by agreeing to compensate the policyholder or other beneficiary if a specified uncertain future event (the insured event) adversely affects the policyholder or other beneficiary.

Minimum Solvency Margin (“MSM”): The prescribed minimum amount by which the value of the assets of the Company must exceed the value of its liabilities.

Reinsurance Recoverables (or Assets): Reinsurance recoverables represent the amount of BEL expected to be recovered via reinsurance treaties or special purpose reinsurance vehicles and correspond to the expected present value of the future cash flows referring to the in force reinsurance agreements.

Risk Appetite: Risk appetite refers to the Group’s relative desire to take specific risks, underpinned by an assessment of the relative risks and rewards.

Risk Margin: The Risk Margin is an allowance for the risk of uncertainty inherent in the best estimate cash flows and is intended to reflect the compensation that an insurer needs to bear this risk.

Tail Value At Risk: Means the conditional average potential given that the loss outcome exceeds a given threshold.

Technical Provisions: The Technical Provisions correspond to the sum of the BEL and Risk Margin.