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North

Group Solvency & Financial Condition Report 2022

The North of England Protecting and Indemnity Association Limited
Registered in the UK: Limited by Guarantee
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Index

Appendices

Approval by the Board of Directors

We acknowledge our responsibility for preparing the Group Solvency and Financial Condition Report ("SFCR") in all material respects in accordance with the PRA rules and the Solvency II Regulations.

We are satisfied that:

a) throughout the financial year in question, the Group has complied in all material respects with the requirements of the PRA Rules and the Solvency II Regulations as applicable to the Group; and
b) it is reasonable to believe that the Group has continued so to comply subsequently and will continue so to comply in future.

On behalf of the Board of Directors

PA Jennings
Director

Date: 24 June 2022

Report of the external independent auditor to the Directors of The North of England Protecting and Indemnity Association Limited ('the Group" and "the Company') pursuant to Rule 4.1 (2) of the External Audit Part of the PRA Rulebook applicable to Solvency II firms

Report on the Audit of the Relevant Elements of the Group Solvency and Financial Condition Report

Opinion

Except as stated below, we have audited the following documents prepared by The North of England Protecting and Indemnity Association Limited as at 20 February 2022:

- The 'Valuation for solvency purposes' and 'Capital Management' sections of the Group Solvency and Financial Condition Report of The North of England Protecting and Indemnity Association Limited as at 20 February 2022, ('**the Narrative Disclosures subject to audit**'); and

- Group templates S02.01.02, S23.01.22, S25.01.22, S32.01.22 ('**the Templates subject to audit'**).

The Narrative Disclosures subject to audit and the Templates subject to audit are collectively referred to as the '**Relevant Elements of the Group Solvency and Financial Condition Report'**.

We are not required to audit, nor have we audited, and as a consequence do not express an opinion on the Other Information which comprises:

- The 'Business and performance', 'System of governance' and 'Risk profile' sections of the Group Solvency and Financial Condition Report;

- Group templates S05.01.02, S05.02.01;

- the written acknowledgement by the Directors of their responsibilities, including for the preparation of the Group Solvency and Financial Condition Report ('**the Responsibility Statement**');

To the extent the information subject to audit in the Relevant Elements of the Group Solvency and Financial Condition Report includes amounts that are totals, sub-totals or calculations derived from the Other Information, we have relied without verification on the Other Information.

In our opinion, the information subject to audit in the Relevant Elements of the Group Solvency and Financial Condition Report of Company as at 20 February 2022 is prepared, in all material respects, in accordance with the financial reporting provisions of the PRA Rules and Solvency II regulations on which they are based, as modified by relevant supervisory modifications, and as supplemented by supervisory approvals and determinations.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) including ISA (UK) 800 and ISA (UK) 805, and applicable law. Our responsibilities under those standards are further described in the *Auditor's Responsibilities for the Audit of the Relevant Elements of the Group Solvency and Financial Condition Report* section of our report. We are independent of the Company in accordance with the ethical requirements that are relevant to our audit of the Group Solvency and Financial Condition Report in the UK, including the FRC Ethical Standard as applied to public interest entities, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Emphasis of Matter – special purpose basis of accounting

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

Going concern

The Directors have prepared the Group Solvency and Financial Condition Report on the going concern basis as they do not intend to liquidate the Company or the Group or to cease their operations, and as they have concluded that the Company's and the Group's financial position means that this is realistic. They have also concluded that there are no material uncertainties that could have cast significant doubt over their ability to continue as a going concern for at least a year from the date of approval of the Group Solvency and Financial Condition Report ("the going concern period").

We used our knowledge of the Group and Company, its industry, and the general economic environment to identify the inherent risks to its business model and analysed how those risks might affect the Company's financial resources or ability to continue operations over the going concern period. The risks that we considered most likely to adversely affect the Company's available financial resources over this period were:

- A significant deterioration in claims experience, potentially caused by market wide events, and;
- A deterioration in the valuation of the Group's investments arising from fluctuation or negative trend in the economic environment;

We also considered less predictable but realistic second order impacts such as failure of counterparties who have transactions with the Group (such as reinsurers) to meet commitments that could give rise to a negative impact on the Group or Company's financial position and increased illiquidity.

We considered whether these risks could plausibly affect the liquidity or solvency in the going concern period by assessing the Directors' sensitivities over the level of available financial resources indicated by the Group and Company's financial forecasts taking account of severe, but plausible adverse effects that could arise from these risks individually and collectively.

Our Procedures also Included:

- Critically assessing assumptions in base case and downside scenarios relevant to liquidity and solvency metrics represents reasonably possible downside, in particular in relation to economic forecasts and historical trends in severe economic situations and overlaying knowledge of the entity' plans based on approved budgets and our knowledge of the entity and the sector in which it operates;

- Assessing how second order risks have been considered, most notably with regards to failure of counterparties and potential impacts to credit spreads in relation to the Company's investments portfolio as well as the overall economic impact of the volatility caused by the COVID-19 pandemic on the economic assumptions used in the scenario testing;
- Comparing past budgets to actual results for the to assess the directors' track record of budgeting accurately

Our conclusions based on this work:

- we consider that the directors' use of the going concern basis of accounting in the preparation of the Group Solvency and Financial Condition Report is appropriate; and
- we have not identified, and concur with the directors' assessment that there is not, a material uncertainty related to events or conditions that, individually or collectively, may cast significant doubt on the Group and Company's ability to continue as a going concern for the going concern period.

However, as we cannot predict all future events or conditions and as subsequent events may result in outcomes that are inconsistent with judgements that were reasonable at the time they were made, the above conclusions are not a guarantee that the Group or Company will continue in operation.

Fraud and breaches of laws and regulations – ability to detect

Identifying and responding to risks of material misstatement due to fraud

To identify risks of material misstatement due to fraud ("fraud risks") we assessed events or conditions that could indicate an incentive or pressure to commit fraud or provide an opportunity to commit fraud.

Our risk assessment procedures included:

- Enquiring of directors, the audit committee, internal audit and inspection of policy documentation as to the Company's high-level policies and procedures to prevent and detect fraud, including the Company's channel for "whistleblowing", as well as whether they have knowledge of any actual, suspected or alleged fraud.
- Reading Board, Audit Committee, Risk Committee and Reserving Committee minutes.
- Using analytical procedures to identify any usual or unexpected relationships.

We communicated identified fraud risks throughout the audit team and remained alert to any indications of fraud throughout the audit.

As required by auditing standards, we perform procedures to address the risk of management override of controls, in particular the risk that management may be in a position to make inappropriate accounting entries and the risk of bias in accounting estimates and judgements such as valuation of gross technical provisions incurred but not reported reserve.

We also identified a fraud risk related to valuation of gross claims incurred but not reported reserve in response to the required significant judgement by management over uncertain future outcomes, being the ultimate total settlement value of insurance contract liabilities.

In determining the audit procedures, we took into account the results of our evaluation and testing of the operating effectiveness of the Company-wide fraud risk management controls.

We have also performed procedures including:

- Identifying journal entries and other adjustments to test based on risk criteria and comparing the identified entries to supporting documentation. These included those posted by unexpected individuals, and unusual entries posted to cash or revenue accounts
- Assessing significant accounting estimates for bias.

Identifying and responding to risks of material misstatement due to non-compliance with laws and regulations

We identified areas of laws and regulations that could reasonably be expected to have a material effect on the Group Solvency and Financial Condition Report from our general commercial and sector experience, and through discussion with the directors and other management (as required by auditing standards), and from Group's regulatory and legal correspondence and we discussed with the directors and other management the policies and procedures regarding compliance with laws and regulations.

As the Group is regulated, our assessment of risks involved gaining an understanding of the control environment including the entity's procedures for complying with regulatory requirements.

We communicated identified laws and regulations throughout our team and remained alert to any indications of non-compliance throughout the audit.

The potential effect of these laws and regulations on the Group Solvency and Financial Condition Report varies considerably.

Firstly, the Group is subject to laws and regulations that directly affect the Group Solvency and Financial Condition Report including financial reporting legislation (including related companies legislation), PRA Rules and Solvency II regulations, pensions legislation and taxation legislation and we assessed the extent of compliance with these laws and regulations as part of our procedures on the related Group Solvency and Financial Condition Report items.

Secondly, the Group is subject to many other laws and regulations where the consequences of non-compliance could have a material effect on amounts or disclosures in the Group Solvency and Financial Condition Report, for instance through the imposition of fines or litigation or the loss of the Group's license to operate. We identified the following areas as those most likely to have such as effect: regulatory capital and liquidity recognising the financial and regulated nature of the Group's activities. Auditing standards limit the required audit procedures to identify non-compliance with these laws and regulations to enquiry of the directors and inspection of regulatory and legal correspondence, if any. Therefore, if a breach of operation regulations is not disclosed to us or evident from relevant correspondence, an audit will not detect a breach.

Context of the ability of the audit to detect fraud or breaches of law or regulation

Owing to the inherent limitations of an audit, there is an unavoidable risk that we may not have detected some material misstatements in the Group Solvency and Financial Condition Report, even though we have properly planned and performed our audit in accordance with auditing standards. For example, the further removed non-compliance with laws and regulations is from the events and transactions reflected in the Group Solvency and Financial Condition Report, the less likely the inherently limited procedures required by auditing standards would identify it.

In addition, as with any audit, there remained a higher risk of non-detection of fraud, as these may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal controls. Our audit procedures are designed to detect material misstatement. We are not responsible for preventing non-compliance or fraud and cannot be expected to detect non-compliance with all laws and regulations.

Other Information

The Directors are responsible for the Other Information.

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

In connection with our audit of the Group Solvency and Financial Condition Report, our responsibility is to read the Other Information and, in doing so, consider whether the Other Information is materially inconsistent with the Relevant Elements of the Group Solvency and Financial Condition Report, or our knowledge obtained in the audit, or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the Relevant Elements of the Group Solvency and Financial Condition Report or a material misstatement of the Other Information. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

Responsibilities of Directors for the Group Solvency and Financial Condition Report

The Directors are responsible for the preparation of the Group Solvency and Financial Condition Report in accordance with the financial reporting provisions of the PRA rules and Solvency II regulations which have been modified by the modifications, and supplemented by the approvals and determinations made by the PRA under section 138A of FSMA, the PRA Rules and Solvency II regulations on which they are based.

The Directors are also responsible for such internal control as they determine is necessary to enable the preparation of a Group Solvency and Financial Condition Report that is free from material misstatement, whether due to fraud or error; assessing the company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern; and using the going concern basis of accounting unless they either intend to liquidate the company or to cease operations, or have no realistic alternative but to do so.

Auditor's Responsibilities for the Audit of the Relevant Elements of the Group Solvency and Financial Condition Report

It is our responsibility to form an independent opinion as to whether the Relevant Elements of the Group Solvency and Financial Condition Report are prepared, in all material respects, with financial reporting provisions of the PRA Rules and Solvency II regulations on which it they based, as modified by relevant supervisory modifications, and as supplemented by supervisory approvals and determinations.

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

A fuller description of our responsibilities is located on the Financial Reporting Council's website at: www.frc.org.uk/auditorsresponsibilities

Report on Other Legal and Regulatory Requirements

Other Information

In accordance with Rule 4.1 (3) of the External Audit Part of the PRA Rulebook for Solvency II firms we are also required to consider whether the Other Information is materially inconsistent with our knowledge obtained in the audit of The North of England Protecting and Indemnity Association Limited statutory financial statements. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

The purpose of our audit work and to whom we owe our responsibilities

This report of the external auditor is made solely to the Company's directors, as its governing body, in accordance with the requirement in Rule 4.1 (2) of the External Audit Part of the PRA Rulebook for Solvency II firms and the terms of our engagement. We acknowledge that the directors are required to submit the report to the PRA, to enable the PRA to verify that an auditor's report has been commissioned by the company's directors and issued in accordance with the requirement set out in Rule 4.1 (2) of the External Audit Part of the PRA Rulebook for Solvency II firms and to facilitate the discharge by the PRA of its regulatory functions in respect of the company, conferred on the PRA by or under the Financial Services and Markets Act 2000.

Our audit has been undertaken so that we might state to the Company's directors those matters we are required to state to them in an auditor's report issued pursuant to Rule 4.1 (2) and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the company through its governing body, for our audit, for this report, or for the opinions we have formed.

Shaun Gealy
for and on behalf of KPMG LLP
Chartered Accountants
Quayside House, 110 Quayside
Newcastle upon Tyne
NE1 3DX
24 June 2022

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

Group standard formula

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

- The following elements of Group template S.22.01.22
  - Column C0030 – Impact of transitional measures on technical provisions

- The following elements of Group template S.23.01.22
  - Rows R0410 to R0440 – Own funds of other financial sectors

- The following elements of Group template S.25.01.22
  - Rows R0500 to R0530 – Capital requirement for other financial sectors (Non-insurance capital requirements)

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

Executive Summary

The Directors present the Solvency Financial Condition Report ("SFCR") for the Group headed by North of England Protecting & Indemnity Association Ltd ("North" or "the company"), based on the financial position of the Group as at 20 February 2022.

Regulatory Requirement

The Group's headquarters are in the United Kingdom. Within the United Kingdom, the company is authorised by the Prudential Regulation Authority (PRA) and dual regulated by the PRA and the Financial Conduct Authority (FCA). Both the PRA and the FCA operate a risk-based approach to supervision, which places emphasis on the need for regulated firms to have in place robust risk management frameworks. The PRA's general objective is to promote the safety and soundness of the firms it regulates and is the company's lead regulator. The FCA is the company's conduct regulator.

North is required to produce a Solvency & Financial Condition Report (SFCR) on a Group basis by the PRA Rulebook, SII Firms/Group Supervision/Part 18.

Contact details for the PRA and the FCA can be found on their respective websites:

www.bankofengland.co.uk/pra

www.fca.org.uk

The Group's external auditor is

KPMG LLP
Quayside House
110 the Quayside
Newcastle upon Tyne
NE1 3DX

Policy

The Group is required by Part 6.1 of the PRA Rulebook to have appropriate systems and structures in place to fulfil the requirements for the SFCR and a written policy in place to ensure the appropriateness of the information enclosed.

The Group maintains a Group Reporting and Public Disclosure Policy which captures the SFCR. This is reviewed annually and was last approved in February 2022.

Review of 2021/22

North Group declared a general increase of 10% for the 2021 policy year and entered the February 2021 renewal with a two-pronged objective to reduce our exposure in underperforming sectors and seek an equitable rating increases across the mutual Membership. This combination, together with a growth in tonnage through the policy year, has resulted in an increase of premium for the Mutual Protecting & Indemnity ("P&I") business of US$3.9 million.

Premiums for the Freight, Demurrage and Defence ("FD&D") class reduced by US$1.1 million, whilst a reduction in additional war risk premiums charged where vessels are operating in areas of perceived enhanced risk contributed to a decrease of war premium by US$0.6 million.

Non-mutual premium reduced by US$2.4 million from US$107.3 million to US$104.9 million. This reflects a planned withdrawal from SMI business lines in the USA part way through the prior year, mostly offset by growth in North Hull, Fixed Premium P&I, and SMI business lines in the rest of the world.

We have seen two noticeable impacts of the Covid-19 pandemic on the cost of claims during the 2021/22 policy year compared to 2020/21. The first is a return to more usual trading levels as the world emerged from the most severe restrictions imposed by the pandemic, and the second is an increase in the frequency and severity of Covid-19 related crew claims. Both impacts serve to increase the cost of claims. In addition, the cost of claims in a policy year tend to be driven by our experience of large claims (those over US$1 million) - at this stage of development, the Group has experienced more large claims than at the same stage of the 2020/21 policy year, and has also experienced two pool claims compared to none on the 2020/21 policy year. The first half of the policy year saw a very high level of activity on the International Group pool, offset by a relatively benign second half of the year. The overall cost of the pool experience has reduced compared to the prior year. Finally, the prior financial year gross claims were impacted by a significant deterioration on a 2019 policy year claim, but this deterioration was fully reinsured. Overall, gross claims have reduced from US$675.5 million to US$469.6 million, with net claims increasing from US$49.2 million to US$60.7 million.

The pandemic has also had a noticeable impact on operating expenses during the year. As restrictions imposed by the pandemic have been lifted, we have seen an increase in expenses compared to the prior year. The increase in gross earned premiums has increased the level of brokerage costs which are included in operating expenses, and also the level of reinsurance premiums and the associated reinsurance commissions which form part of the Group's total expenses. Total expenses, comprising net insurance claims, operating expenses and reinsurance commissions, have increased from US$33.1 million to US$57.4 million.

The Group's investment assets produced a loss of US$5.9 million in the year and there was a loss of US$3.3 million on the Group's derivative hedging arrangements. The derivative contracts in place provide increased stability for the Group where the majority of income is in US Dollars but a large proportion of administrative expenses, including staff costs, are incurred in Sterling.

Overall, the Group's surplus after tax reduced from US$49.5 million in 2021 to US$14.0 million in 2022.

The total accumulated surplus attributable to Members increased from US$292.1 million at 20 February 2021 to US$332.1 million at 20 February 2022. The increase is a result of the surplus recorded above, together with movements on the Group's defined benefit pension deficit recorded in other comprehensive income.

A Business and Performance (Unaudited)

A.1 Business

Principal Activities

The principal activities of the Group are the insurance and reinsurance of marine P&I, FD&D and War Risks on behalf of Members. The company also underwrites Hull, P&I, Personal Accident and Aquaculture business for its policyholders. North principally operates from its head office in Newcastle upon Tyne but also has subsidiary or branch offices in China (Hong Kong and Shanghai), Greece, Singapore, Japan, USA, Ireland, Australia, New Zealand, Canada and the Netherlands.

The principal activities of the Group's subsidiaries are marine insurance and insurance broking.

Strategy

North's purpose is to enable our Members to trade with confidence, and North's vision statement is to be the Club of choice. The Directors have developed four strategic goals to further the vision over the next five years as follows:

- Increase our mutual and diversified income
- Be a leader in all our key service and product areas
- Build our financial strength and standing in the International Group
- Empower our people to develop, and connect responsibly with our communities and the environment.

Key Performance Indicators ("KPIs") have been identified against which management report to the Board on a regular basis to monitor the achievement of these strategic goals.

Business Performance

The Group's key financial and other performance indicators were as follows:

	2022 US$M	2021 US$M
Gross written premiums	425.2	425.4
Surplus after tax	14.0	49.5
Free reserves (total accumulated surplus)	332.2	292.3

A.2 Underwriting Performance

We saw an increase in mutual premium as the Group continues to pursue its strategy to increase income. The 10% General Increase declared for the P&I mutual book at the 2021 policy year renewal and a growth in tonnage through the year contributed to growth in mutual income despite some small decreases in premium in the FD&D and War class. This was offset however by overall decreases in the diversified premium as a result of planned withdrawal from the SMI business lines in the USA.

Written premium decreased marginally from US$425.4 million in 2021 to US$425.2 million in 2022.

Premium written by business segment is as follows:

	2022 US$M	2021 US$M
P & I	296.2	292.3
FD & D	22.8	23.9
War	1.3	1.9
Fixed Premium	104.9	107.3
	425.2	425.4

As trading returns to more usual pre-pandemic levels the cost of claims increases due to the frequency of claims and also as the Group has incurred additional Covid-19 crew related claims. This, coupled with the Group's large claim experience in the year drives the result. We have experienced more large claims than at the same stage of the 2020/21 policy year, and has also experienced two pool claims compared to none on the 2020/21 policy year. Although the first half of the policy year saw a very high level of activity on the International Group pool this was offset by a relatively benign second half of the year and overall the cost of the pool claims reduced compared to the prior year. Overall, gross claims have reduced from US$675.5 million to US$469.6 million, with net claims increasing from US$49.2 million to US$60.7 million.

As Covid-19 restrictions imposed by the pandemic have been lifted, we have seen an increase in expenses compared to the prior year. This coupled with increased brokerage costs and reinsurance commissions has increased total expenses from US$33.1 million to US$57.4 million.

A.3 Investment Performance

The Group's investment assets produced a loss of US$5.9 million in the year and there was a loss of US$3.3 million on the Group's derivative hedging arrangements. The derivative contracts in place provide increased stability for the Group where the majority of income is in US Dollars but a large proportion of administrative expenses, including staff costs, are incurred in Sterling.

A.4 Performance of Other Activities

Overall, the Group's surplus after tax reduced from US$49.5 million in 2021 to US$14.0 million in 2022.

The total accumulated surplus attributable to Members increased from US$292.1 million at 20 February 2021 to US$332.1 million at 20 February 2022. The increase is a result of the surplus recorded above, together with movements on the Group's defined benefit pension deficit recorded in other comprehensive income.

A.5 Any Other Information

None.

B System of Governance (Unaudited)

B.1 General Information on the System of Governance

The Directors are collectively responsible for the long-term success of the Group, setting the strategic aims and ensuring that obligations to Members and others are understood and met.

The Board of Directors is responsible for directing the affairs of the Group in compliance with statutory and regulatory requirements. The Board consists of seven to nine Member Directors, up to two Executive Directors and up to five Independent Directors. The Directors have a Nominations and Remuneration Committee, which evaluates the performance of the Directors, proposes new Directors, and determines the Group Remuneration Policy including the policy for remuneration of the Group's Executive and Non-Executive Directors and senior managers.

The Members Board provides a forum for Members to play an enhanced role in the governance of the Group. It has separate committees to consider matters relating to the P&I Class and FD&D Class and an Elections Committee which considers appointments to the Members Board.

The Members Board has the power to nominate Directors. Any Director so appointed may serve until the next annual general meeting, when they must retire and may offer themselves for reappointment by the Members.

The system of governance adopted is considered appropriate for the nature, scale and complexity of the risk inherent in the business.

B.2 Fit and Proper Requirements

The Group has a policy which is owned by the Group Nominations and Remuneration Committee and is reviewed annually. The policy requires that prior to approving the appointment of any candidate as a Responsible Person, the Board of Directors must take appropriate steps to ensure that the candidate is fit and proper to perform the relevant role or function. This assessment includes, but is not limited to, confirmation that the candidate:

- Has the appropriate personal characteristics;
- Possesses the required level of competence, knowledge and experience;
- Has the relevant qualifications; and
- Has undergone or is undergoing all training required to perform the role or function effectively and in accordance with all relevant requirements.

The policy also sets out that the Board of Directors must review and confirm annually whether the Responsible Persons meet, and continue to meet, the applicable requirements.

The goals pursued by this policy are to:

- Ensure that Group undertakings comply with all applicable laws, regulations and prudential standards ("Requirements") relating to the fitness and propriety of persons who effectively run and/or perform a key or designated function for that undertaking ("Responsible Persons");
- Clearly describe the procedure for assessing the fitness and propriety of Responsible Persons, both when being considered for the specific position and on an on-going basis;
- Clearly describe the situations that give rise to a re-assessment of applicable Requirements:
- Clearly describe the Group's procedures and internal standards for assessing the skills,

knowledge, expertise and personal integrity of other relevant personnel not subject to Requirements, both when being considered for the specific position and on an on-going basis.

The Head of Group Compliance is responsible for monitoring all Requirements on an on-going basis in order to identify any matters which necessitate the Requirements to be reassessed and updates the North Company Secretary as appropriate. The Requirements shall be reassessed in the event of the following:

- any change or proposed change to the relevant laws, regulations and prudential standards in any jurisdiction where any Group undertaking conducts business;
- a Group undertaking commencing or proposing to conduct business in any jurisdiction where it does not currently do so.

This policy is reviewed on an annual basis by the North Company Secretary and upon notification of any change or proposed change noted above.

Approved Persons

North Group maintains a Management Responsibilities Map (Appendix 1), setting out details of all individuals approved or authorised to undertake senior management, controlled or certification functions.

This map includes the regulatory structure of the Group and identifies the reporting lines applicable to all approved persons.

B.3 Risk Management System Including the Own Risk and Solvency Assessment (ORSA)

Risk Culture

The Group's aim is to embed a strong culture of risk management at all levels within the organisation, so that all members of staff understand their role and its relationship to risk management. The Risk and Compliance department engages throughout the business to ensure that the risk management and ORSA framework are understood at all levels.

Board Oversight of Risk Management

The Board is responsible for setting strategy – including target capital coverage – and for establishing risk appetite which is expressed in the Board's risk appetite statements. The Board is also responsible for putting in place systems of governance around risk management and has ownership of the ORSA framework and documentation.

Group Risk Committee

The Board has established a Group Risk Committee ("GRC") to which it has delegated key responsibilities within the ORSA framework. The scope of the GRC's responsibilities is group-wide and includes the following key areas:

Governance: Oversee the integration of risk management across the Group and ensure the framework is aligned with its strategic objectives. Review the risk management framework including its documentation and related policies and procedures.

Regulatory: Review the Group's regulatory position, the outcome from regulatory assessments, regulatory breaches and mitigating actions or responses.

Risk appetite: Review and make recommendations in respect of risk appetite.

Risk policies: Review the Group's risk policies and policies in respect of compliance with legal obligations.

Risk identification, measurement, control and reporting: Oversee the production and maintenance of risk registers and assess the appropriateness of risk management controls including controls over illegal acts. Set appropriate risk indicators, monitor and review risk reporting against risk indicators and review mitigating actions for reporting exceptions. Review risk profiles against the Board's risk appetite.

Investment risk: Oversight of investment risk including compliance with the Board's agreed appetite for investment risk and ensuring that investment management and decisions are within the framework agreed by the Board for managing investment risk including market and counterparty risks.

Capital management : Review the method of assessment of capital requirements and the outputs of those processes.

Stress tests and reverse stress tests: Review stress tests and reverse stress tests and assess their adequacy and effectiveness in testing the robustness of the Group's business model.

ORSA assessment: Review ORSA documentation, assess its adequacy and effectiveness in capturing the ORSA system and its outputs and assess its compliance with regulatory requirements.

Enterprise Risk Management Committee

To ensure sound risk management principles and practices are embedded within the business, management have formed an Enterprise Risk Management committee ("ERM committee"). This committee meets at least three times each year and its responsibilities broadly follow those of the GRC but at a more granular management level. This committee is chaired by North's Chief Risk Officer ("CRO").

Reserving Committee

The Reserving Committee is a management committee chaired by the Group's Actuary. This committee meets at least four times each year and includes representatives from key functional areas of claims and underwriting as well as the Chief Actuaries for both the UK and Ireland, the CEO of North EU, the Chief Financial Officer and representatives from the Group Risk function. The committee's responsibilities are to review, challenge and develop the process for arriving at the Group's reserving and technical provisions and the results thereof.

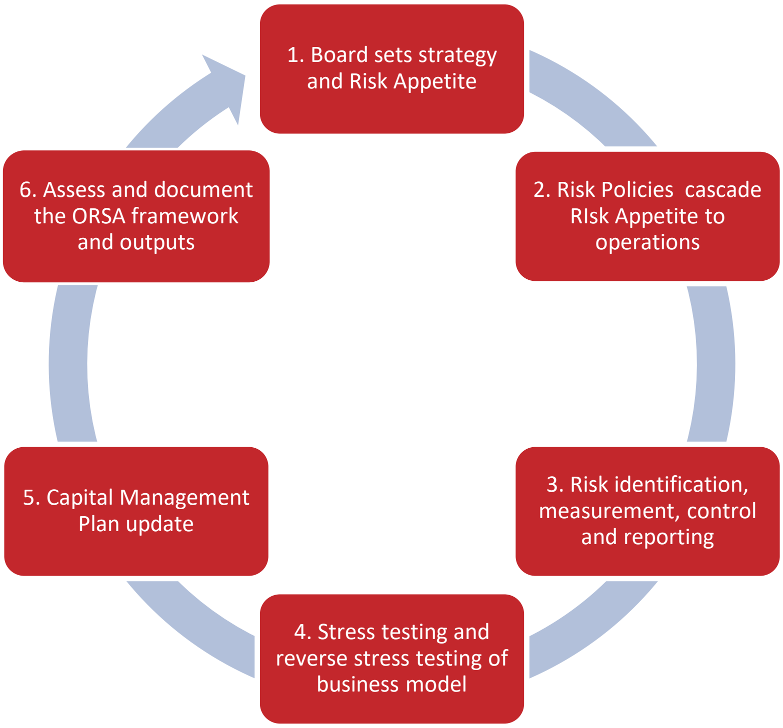
Investment Committee

The Board has formed an Investment Committee, the principal role and duties of which are to:

i) review the investment strategy of the Company against the risk appetite and risk framework approved by the Directors;
ii) monitor investments and their performance against benchmark as appropriate;
iii) review and monitor the performance of investment managers and advisors, and make recommendations as to their appointment; and
iv) ascertain the outlook for key investment markets.

Risk Management Framework

The risk management framework has been developed over several years and is summarised below. The process operates as a feedback loop and reflects the requirement to reconsider strategy and risk appetite in view of risk assessment, results and capital requirements. Each step in the cycle may be iterative and may be revisited as a result of the outputs of subsequent steps.



The core elements of the steps above are as follows:

Core Element	Description
Board sets strategy and risk appetite	Quantitative parameters set for each primary category of risk – underwriting, market and operational. A total risk limit set as an absolute amount at a 1 in 20 year probability. Target capital coverage established as a range by reference to the overall risk limit.
Risk policies cascade risk appetite to operations	Set out the operational response to the Board's risk appetite for risk within underwriting, reinsurance, investment, operations and capital management. Establish documentary link between risk appetite and operational processes and procedures. Separate policies to support other areas of internal governance covering internal audit, valuation of assets and liabilities, remuneration and outsourcing.
Risk identification, measurement, control and	**Risk register** Central repositories for all risks identified by the Group.

reporting	Constructed on the basis of "key" risks comprising of sub-risks and risk components. Responsibility for the oversight of each key risk is assigned to an individual risk owner. Key controls identified for all risks with the accepted risk treatment (prevent, mitigate or accept). **Emerging risk protocol** Process for risk identification by anybody within the organisation. Assessment of potential impact, mitigation in place or required and changes required to the risk register. **Risk tolerance and risk indicators** Risk indicators are assigned to each risk and sub-components as agreed with risk owners. Risk owners report quarterly on their risk indicators to the ERM Committee and the Group Risk Committee. **Risk profile** Calculation performed independently of risk owners to provide segregation in the process. Variety of actuarial (statistical or mathematical) and practical techniques employed. Correlation applied between risks and risk categories to reach overall assessment. Assessment at a 1 in 20-year probability represents the position against the Board's stated risk appetite.
Stress testing and reverse stress testing of business model	A combination of adverse scenarios identified by the Risk function, the Board or the GRC and those set by regulators are assessed. Stress tests assess the impact of adverse scenarios on the Group's business model. Reverse stress tests ascertain the circumstances which could cause the Group's business model to fail.
Capital management plan update	Performed for each separate business unit on a commercial basis and for each relevant jurisdiction on a regulatory basis. Outputs are forecast free reserves, regulatory capital (own funds or local equivalents), minimum and solvency capital requirements (or local equivalents) and rating agency capital calculations.
Assess and document the ORSA framework and outputs	Brings together the above features to assess the Group's risk and solvency position against its key strategic goals.

Own Risk and Solvency Assessment ("ORSA")

The Group has in place an ORSA policy. The purpose of this policy is to set out the processes and methodologies for carrying out the ORSA.

Each ORSA process takes place as part of the group's annual strategic and capital management cycle. Overall responsibility for oversight of the process rests with the CRO. Final review, approval and sign-off is undertaken by the ERM committee, the GRC and the Board itself.

The numeric element of the ORSA process begins its cycle following the Board's approval of the updated business plan in November, with an updated ORSA report presented to the February Board meeting.

The ORSA process assesses the Group's 5-year business plan.

B.4 Internal Control System

The Group has a robust system of internal controls which is designed to provide reasonable assurance that its financial reporting is reliable, it is compliant with applicable laws and regulations and its operations are effectively controlled. The directors are ultimately responsible for overseeing and maintaining the adequacy and effectiveness of the risk management and internal control systems. In practice, the oversight and management of these systems necessarily involves Board committees, members of senior management and the risk, finance and compliance teams.

Internal controls are documented in the Group's policies and procedure manuals, covering all applicable regulatory requirements and core areas of operation. They are also summarised in the risk register, which ensures they are appropriate for use in managing the risks faced by the Group to within the documented risk appetite.

The key elements of the Group's internal control framework are:

Corporate governance: sets out how people and committees are organised and managed to support strategic and operational objectives.

Planning and budget process: supports the implementation and monitoring of corporate strategy.

Risk management: facilitates the identification, assessment, mitigation and reporting of risk.

Compliance: monitors compliance with legal and regulatory requirements, identifies and monitors the control of legal and regulatory risks.

Control policies and processes: govern the management and oversight of key risks.

Information and communication: used to assess whether the components of control are present and functioning, identifies control deficiencies to those responsible for taking corrective action.

Assurance: reporting on the effectiveness of internal controls.

Risk and Compliance Functions

The CRO leads the Risk and Compliance Department and formally reports to the GRC at least three times each year. The CRO has a direct and independent line of contact to the GRC at any time.

Key activities undertaken by the Group's Risk and Compliance functions are summarised as follows:

Identifying & Assessing	• Assess relevant risks and controls • Determine applicable requirements • Make initial assessment of risk valuation and identify risk limits
Monitoring & testing	• Monitor policies and procedures and compliance with them • Liaising with other internal control functions to ensure co-ordinated approach • Monitoring of risk valuations and risk indiators compared to set limits • Stress testing and risk scenario analysis
Advising (Including Regulatory)	• Provision of relevant advice and training • Interaction with worldwide regulators • Proposals for risk appetite and tolerance limits
Reporting	• Reporting on activities to relevant Board committees and, ultimately, the Board.

B.5 Internal Audit Function (Outsourced)

The Group outsources its Internal Audit function to PWC. The relationship is governed by a detailed engagement letter, charter and plan. The scope of the internal audit programme is to determine whether the group's risk management, control and governance processes, as designed and represented by management, are adequate and functioning in a manner to ensure that:

- Risks are appropriately identified and managed;
- Interaction with the various governance groups occurs as needed;
- Significant financial, management and operating information is accurate, reliable and timely;
- Employees' actions are in compliance with policies, standards, procedures and applicable laws and regulations;
- Resources are acquired economically, used efficiently and adequately protected;
- Programs, plans and objectives are achieved;
- Quality and continuous improvement are fostered in the Group's control process;
- Significant legislative or regulatory issues impacting the Group are recognised and addressed properly; and
- Consistency of standards and approach across the various elements and companies within the Group.

In addition, the Internal Audit function can be asked by the business, the second line of defence or the Board to carry out specific one-off tasks where its knowledge and expertise can be utilised without compromising its independence. All internal audit work results, including one-off tasks, are reported to the Group Audit Committee.

Independence and objectivity from the activities that Internal Audit reviews is achieved by ensuring that:

- There is a direct line of reporting to the Group Audit Committee;
- All internal audit activities are free of influence from anyone in the organisation, including matters of audit selection, scope, procedures, frequency, timing or report content;
- Members of the Internal Audit function are able to meet with the Group Audit Committee on request of the Board or Group Audit Committee;
- The function has the necessary skills and resources required to deliver the internal audit plan;
- Internal Audit has the authority to audit all parts of the business; and
- Internal Audit has full and complete access to all information, records, facilities and personnel relevant to the performance of an audit.

B.6 Actuarial Function (Outsourced)

The Actuarial Function is outsourced to ensure appropriate levels of technical resource and expertise are available to the Group. The Actuarial Function is outsourced to Lane Clark & Peacock.

The outsourcing provider provides a Chief Actuary, as defined by PRA rules. This appointment is approved by the Board and subject to review, on an on-going basis, in accordance with the Group's policy and procedures concerning the fitness and propriety of regulated function holders.

The Actuarial Function is independent of other functions and is constituted by individuals who have a sufficient level of independence from the Group's senior management team. The Actuarial Function is appointed by, and reports to, the GRC.

The key areas of responsibility for the Actuarial Function include:

Technical provisions: Co-ordinating the calculation, ensuring the appropriateness of methods, assumptions, data and models used, and informing the Board of the reliability and adequacy of the calculation.

Expressing an opinion on the overall underwriting policy: This includes an assessment of the sufficiency of premiums, underwriting policies and processes, profitability and volatility within underwriting and pricing models.

Expressing an opinion on the adequacy of reinsurance arrangements: This includes an assessment of the reinsurance programme and security, evaluation of alternative reinsurance programmes, calculation of reinsurance recoveries in technical provisions and the ORSA and reinsurance policies.

Contribution to risk management: with particular focus on the appropriateness of risk modelling underlying the calculation of capital requirements and the ORSA.

The Actuarial Function is required to report on its findings in each of the four areas above as a minimum, on an annual basis. The component reports are produced for each of these areas at the time that the analysis is completed. These component reports are then combined into an annual aggregate report which includes comments on the Actuarial Function's contribution to the Group's risk management system.

B.7 Outsourcing

The Group outsources certain functions and activities to take advantage of economies of scale and external expertise. The actuarial and internal audit functions represent the most significant activities which are outsourced to external providers, as described above.

The Group has adopted an Outsourcing Policy which establishes a prudent risk management framework in relation to the management of outsourced arrangements and ensures compliance with relevant regulatory requirements. The Policy covers the entire outsourcing lifecycle, from identifying the need for outsourcing through relationship management and oversight, including performance measurement and reporting, and provides processes to effectively manage the risks associated with outsourcing relationships.

B.8 Any Other Information

None.

C Risk Profile (Unaudited)

Overview

The Group operates a low risk business model that is supported by a robust risk management framework which ensures risks are well understood and controlled. Policies and procedures are in place to ensure risks are managed within the Board's risk appetite.

A breakdown of the valuation of risks within the SCR is included within section E2.

Risk Profile Drivers and Measures

An overview of the principal risks associated with the Group's business including an outline of how each is managed follows. Risk are recorded in the risk register and are allocated to risk categories which are aligned to Board's risk appetite statements. For internal risk valuation purposes, risks are valued across a range of probabilities by combining both actuarial and practical techniques. Our risk profile is calculated by our stochastic capital model, providing a consistent presentation of the possible deviation from business plan expectation for all risks and business entities. Meetings with risk owners take place to discuss the valuation of their risks.

For premium risk, we calculate model parameters based on our own claims history to set claims value and volatility expectations. Resulting parameters are incorporated into our stochastic capital model alongside our current reinsurance programme to calculate the range of future net claims (after reinsurance).

The modelling of reserving risk is based on our own claims history and takes into account our reinsurance programme.

Market risk for investment assets (including pension scheme assets) is provided by our investment advisors through an economic scenario generator (ESG). This information feeds directly into our stochastic capital model.

Some risks facing the Group are not quantifiable using statistical or mathematical techniques. These risks are considered individually to assess their possible risk valuations across a range of likelihoods.

At each selected probability point (e.g. a likelihood of one in twenty years), the relevant individual risks within each risk category (underwriting, market and operational) are correlated to provide values against the risk appetite statements. These figures are further correlated between risk categories to provide an overall value to compare to the risk limit shown in the statement of Board risk appetite.

Stress and Scenario Testing

The stress and scenario framework is an important part of the Group's risk management framework and is applied to a range of business processes to assist management and the Board in understanding the potential vulnerabilities within the business model and business plans. This approach is overseen by the ERM committee and is designed to provide qualitative and quantitative information on the implications arising from specific adverse scenarios, including any mitigating actions available.

There are three main elements to the stress and scenario framework:

Sensitivity testing involves looking at the impact on the Group's business model of changing a single business plan assumption.

Stress and scenario testing involves changing a number of business plan assumptions at once to reflect a stressed but plausible economic or business scenario.

Reverse stress testing involves consideration of scenarios which could render the Group's current business model unviable.

C.1 Underwriting Risk

The Group includes companies that issue contracts that transfer insurance risk.

The principal risk the Group faces under insurance contracts is that actual claims payments or the timing thereof, differ from expectations. This risk is influenced by pricing, the frequency of claims, severity of claims and the subsequent development of long-tail claims or latent claims.

In addition, the Group faces the risk of a catastrophic loss event, where the likelihood of the claim occurring is classified as extremely remote. This equates to a claim with a 1 in 200 chance of occurring.

The Group's underwriting strategy is to seek a diverse and balanced portfolio of risks to limit the variability in outcomes. Business is spread across geographical regions and vessel types and sizes. Underwriters calculate premiums for each risk written on a range of criteria, including (but not limited to) financial exposure, loss record, risk characteristics, limits and deductibles. The Group also recognises that insurance events are random by nature and that the actual number and size of events may vary from those estimated using established statistical techniques.

The objective is to ensure that risks are mitigated to a level within the statement of risk appetite approved by the Board. To achieve this, the controls operated include:

- Comprehensive reinsurance programme covering both vertical risk (one claim of a very high individual value) and horizontal risk (where many claims accumulate to a high value);
- Experienced underwriters operating to detailed procedural guidance, established authority limits and appropriate management review;
- Regular review of claims reserves, both for individual claims and in the aggregate;
- Monitoring of the claims environment to ensure that changes which could influence the future valuation of claims are recorded and accounted for; and
- Setting of overall technical provisions at a prudent percentile of confidence in accordance with the reserving policy approved by the Group Audit Committee and the Board.

Each of these mitigation techniques is monitored regularly to ensure that there have been no changes within the book of business or the insurance market which would render them ineffective or significantly less effective. In addition, regular monitoring of compliance with internal controls takes place to ensure their continuous effectiveness.

Given the wide spread of business there are no material underwriting risk concentrations for the Group.

C.2 Market Risk

Market risk is the risk that the value of the Group's assets, liabilities or income from its assets may fluctuate due to market movements. Sources of general market risk include movements in interest rates (interest rate risk), exchange rates (currency risk) and asset prices (price risk) – all are further detailed below. It is important to note that none of these sources of risk is independent of the others.

The guiding principle for the Group's investment risk management, including market risk, credit risk and liquidity risk, is the Prudent Person Principle (as articulated in the Solvency II Directive as applicable in the UK). In particular:

- Investment risks have been confirmed as 'ancillary' to those associated with the writing of insurance business, and defined as such within the Board's risk appetite;
- Some investment activities are outsourced to expert managers and advisers, although the Group Risk Committee remains responsible for the investment risk undertaken by the Group;
- Investment parameters specify detailed quantitative restrictions for all mandates; and
- The use of derivatives is strictly controlled and monitored.

Market risk is managed by adjusting the allocation to asset classes to reflect the investment risk appetite approved by the directors. The concentration of investments into any one asset is also restricted. The asset class allocation seeks to match assets against technical provisions by currency and maturity. In addition, the Group ensures minimal risk is taken with committed regulatory capital.

Monitoring of the risk position compared to risk appetite takes place regularly using information from investment managers and custodians, specific value at risk models and economic scenario generators. Risk concentrations are captured using the 'look through' facilities within these models.

Currency Risk

Currency risk is the risk that the fair value of future cash flows of assets and liabilities will fluctuate because of changes in foreign exchange rates. The Group operates internationally and its exposures to foreign exchange risk arise primarily with respect to the US Dollar and UK Sterling but also Euro and other global currencies. The asset allocation policy applied to the investment portfolio contains provisions for matching of assets and liabilities by currency to mitigate exposure to currency risk.

Interest Rate Risk

Interest rate risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market interest rates. Interest rate risk arises primarily from the nature and term of investments held and is managed through the buying and selling of appropriate fixed interest securities of different durations.

Price Risk

Price risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market prices. The Group is exposed to price risk on its holdings in debt securities.

The Group manages its exposure to price risk by setting constraints on its investments and by limiting its investments in each country, sector and market. Market valuations are obtained both from investment managers and custodians on a regular basis.

C.3 Credit Risk

Credit risk is the risk that a counterparty will cause a financial loss by failing to discharge an obligation to a Group company. This risk arises principally on the Group's financial assets, including investments, reinsurance recoveries and premium receivables.

Investment related credit risk is managed through the board-approved investment guidelines issued to the investment managers. The guidelines impose strict diversification limits by credit rating, maturity and per issuer.

Non-investment related credit risk is managed through monitoring of overdue receivables from policyholders on a regular basis, and by the requirement for all reinsurers providing security on the Group's reinsurance programmes to comply with a minimum rating requirement.

The most significant concentration of credit risk lies within the reinsurance recoveries, in particular those from one reinsurer (NEMIA) which has been established by the members of North but does not form part of the Group. NEMIA is rated 'A' by Standard and Poor's and the risk to the Group is viewed as negligible in all but the most extreme circumstances.

C.4 Liquidity Risk

Liquidity risk is the risk that cash may not be available to pay obligations when due at a reasonable cost. Liquidity risk is managed in accordance with the Group's Liquidity Policy by maintaining adequate reserves and banking facilities and ensuring that the spread of investments across short, medium and long term funds will enable any short term funding requirements to be met.

Liquidity is continuously monitored by review of actual and forecast cash flows and the Group has negligible liquidity risk in normal business circumstances. Premiums are received well in advance of liabilities and most assets are traded in extremely liquid markets so that funds are available from the sale of these without material discount in all but the most extreme cases.

The liquidity position is monitored under stressed scenarios which include major claim events and reductions in market liquidity. A detailed analysis of the maturity profile of financial instruments at the reporting date is included within the financial statements.

C.5 Operational Risk

The Group is exposed to operational risk, defined as the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events. In particular, this includes the risk of business disruption, of compliance or regulatory breaches, or of poor service delivery, any of which could result in damage to the Group's reputation and reduce its ability to meet its stated objectives.

Primary responsibility for the development and implementation of controls to address operational risks rests with senior management. The main operational risks identified relate to compliance with legal and regulatory requirements and those related to business continuity and provision of IT services, including information security. These risks are separately identified within the risk register. There is no specific concentration of risk in this category.

Operational risk controls are many and varied given the wide range of possible causes, including controls in the following areas:

- Regular review of service delivery standards and prompt investigation of potential shortfalls in service delivery;
- Dedicated risk and compliance department with access to appropriate professional advice;
- Detailed business continuity planning and regular testing of recovery plans;
- Information security assessments, detailed gap analysis, and roll out of updated procedures and policies;
- Dedicated human resources department ensuring appropriate monitoring of recruitment and performance of staff members;
- Monitoring of monthly financial results and comparison of results to budget and forecast; and
- Regular monitoring of and interaction with all branches and subsidiaries.

C.6 Other Material Risks

Pension Risk

The Group operates two defined benefit pension schemes and is accordingly exposed to changes in the valuation of scheme assets and liabilities. Both schemes are closed to the future accrual of benefits. Full details of the schemes and their valuation at the balance sheet date can be found in the financial statements.

Whilst the management of the schemes' assets and the risks of the schemes are the responsibility of the trustees, the risk to the Group is managed through the regular monitoring of the asset valuation and the key economic indicators which influence the valuation of the obligations. In addition, the assets and liabilities of the schemes are considered and modelled alongside those of the Group.

C.7 Any Other Information

Covid-19

The Group continues to monitor the implications of the Covid-19 pandemic. Given the nature of the risks underwritten by the Group, the Group has not been adversely impacted by the pandemic. The Group acknowledges the continued unprecedented economic uncertainty resulting from the pandemic and has taken this into account when developing its strategic objectives and business plans. The Group's ORSA has also considered the on-going uncertainties arising from the pandemic.

Ukraine

The implications for the Group arising from the Russian invasion of Ukraine are being continuously monitored. To date, the war in Ukraine has not had a material financial impact on the Group but the resulting crisis represents a source of potential increased risks for the Group in the following key areas which are being monitored, managed and, where applicable mitigated:

- Direct exposure to war risks.
- Increased claims costs due to increased complexity and / or inflation.

- Loss of premium from sanctioned entities we are no longer able to insure.
- Volatility within the investment markets.
- Increased operational risks arising, for example, from the complex sanctions regimes being implemented globally.

D Valuation for Solvency purposes (Audited)

Basis of Preparation of the Group Solvency II Return

The Group applies the accounting consolidation-based method for preparing the Group solvency return. Unlike the IFRS financial statements however, not all of the Group entities as shown in Appendix 2 are included in the Solvency II consolidation. Full consolidation is applied only to insurance and reinsurance subsidiaries.

The other entities in the Group remain on the Solvency II balance sheet as investments – related undertakings including participations; or investments - other.

D.1 Assets

Assets are recognised and measured for Solvency II purposes consistently with the IFRS financial statements. Solvency II asset valuations also follow the IFRS financial statements where those financial statements provide a market consistent valuation. The main areas where the financial statements do not provide a market consistent valuation are:

- Investments – related undertakings including participations;
- Reinsurance recoverables;
- Deferred acquisition costs; and
- Intangible assets.

The following table sets out the value of the Group's assets at 20 February 2022 and 20 February 2021:

	20 February 2022		20 February 2021	
	IFRS assets US$M	Solvency II Assets US$M	IFRS Assets US$M	Solvency II Assets US$M
Intangible assets	19.2	-	19.2	-
Property, plant and equipment	21.4	20.7	21.1	20.2
Investments – related undertakings including participations	-	12.0	-	5.6
Investments - other	258.5	186.3	301.4	212.3
Reinsurance recoverables	1,099.3	1,126.1	1,247.2	1,237.1
Receivables	142.6	46.2	95.7	34.1
Deposits, Cash and cash equivalents	112.6	79.6	132.1	89.9
Deferred acquisition costs	6.4	-	7.2	-
Total Assets	**1,660.0**	**1,470.9**	**1,823.9**	**1,599.2**

The Group's assets are recognised and valued using the following principles:

Intangible Assets

The intangible assets held by the Group (US$19.2 million; 2021: US$19.2 million) do not meet the criteria to be included as an asset for Solvency II purposes and therefore no value is attributable to them.

Property, Plant and Equipment

Land and buildings are valued for Solvency II purposes on the same basis as the financial statements as those statements are considered to provide a market consistent valuation.

Included in property, plant and equipment is land and buildings of US$16.7 million (2021: US$16.9 million). Land and buildings have been valued by independent valuers within the last three years and included at that revalued amount in the financial statements. This is also the market value of these properties in the Solvency II balance sheet. Alongside direct comparison of the properties with other properties sold in the relevant markets, the valuations have been performed using an investment method approach which involves an assessment of the likely annual rental value of the property which is then translated to a freehold capital value by applying an appropriate investment yield. The sensitivity of this valuation to changes in unobservable inputs is included in the Group's financial statements.

Other property, plant and equipment includes IFRS 16 right of use assets which are valued on the basis of future cash flows, which is a market consistent valuation basis and so the carrying value in the IFRS financial statements is also the carrying amount in the Solvency II balance sheet. Other property, plant and equipment is less material, and is included on the Solvency II balance sheet also at its IFRS carrying amount.

The difference between the IFRS property, plant and equipment and that shown in the Solvency II balance sheet is the result of the differing basis of consolidation applied in their preparation.

Investments – Related Undertakings Including Participations

All of the Group's undertakings are consolidated in the IFRS balance sheet and hence are not included as investments. Insurance undertakings remain consolidated on a Solvency II basis, and so the value of the investments in participations on the Solvency II balance sheet relates to the investment in the brokerage subsidiaries and SMI.

The investments in the brokerage subsidiaries are valued based on their cost for IFRS purposes but must be replaced by a market consistent valuation for Solvency II purposes. The investments are valued on an IFRS equity method, which adjusts the cost of the investments for subsequent movements in reserves. Any goodwill or intangible assets on the subsidiaries' own balance sheets are then deducted in arriving at the final Solvency II valuation.

Investments - Other

This includes the Group's financial investments and the investment in the Hydra North Cell ("the Cell").

All of the Group's financial investments are traded on mainstream exchanges and included in the financial statements at fair value, which is consistent with Solvency II valuation requirements. Fair value is determined based on published quotes in an active market. A market is regarded as active if quoted prices are readily available from a broker, dealer, exchange, pricing service, industry group or regulatory agency.

The investment in the Hydra North Cell is part of the mechanism through which North participates in the International Group pooling agreement, with the Cell reinsuring part of North's claims incurred from that participation. The investment is valued using a current replacement cost approach which is an alternative valuation method as set out in the Solvency II regulations. This approach assumes that the service capacity of the asset can be measured as the amount of capital required to establish an alternative asset that could provide an equivalent amount of reinsurance security as the Cell currently provides to North. The valuation is therefore based on the excess of the assets of the Cell over its liabilities, both measured on a Solvency II basis. Note that as the investment in the Cell is considered to be a restricted asset (see section E.1 Own Funds), the solvency coverage of the Group is not sensitive to changes in the valuation of the investment to the extent that there is an excess of assets over liabilities in the Cell.

The difference between the IFRS and Solvency II amount arises mainly from the fact that the Cell, which contains US$142.3 million (2021: US$115.3 million) of financial investments, is not consolidated in the Solvency II balance sheet. This is partially offset by the inclusion of the investment in the Cell itself (US$40.2 million). In addition, amounts held in a money market fund are included as cash and cash equivalents on the IFRS balance sheet, but within investments in collective investments undertakings on the Solvency II balance sheet (US$29.9 million).

Reinsurance Recoverables

In the Solvency II balance sheet, the reinsurance recoverables are valued as part of net technical provisions (see D.2 Technical Provisions). Reinsurance recoverables represent amounts recoverable from external reinsurers under the Group's reinsurance programme. The programme consists of excess of loss, stop loss and quota share reinsurance arrangements. In addition, the parent company, North, and its subsidiary, North EU, participate in the International Group pooling arrangement, including market reinsurance bought by the pool.

Receivables

Some of the receivables on the IFRS balance sheet are held by the Cell and the brokerage subsidiaries which aren't consolidated on the Solvency II balance sheet. In addition, there are insurance and reinsurance receivables that are included in the future cash flow forecasts for the purposes of calculating Solvency II technical provisions and hence not included as receivables on the Solvency II balance sheet. Adjustments are also made to remove prepayments from the Solvency II balance sheet.

Deposits, Cash and Cash Equivalents

Cash and deposits are included in both the IFRS financial statements and for Solvency II purposes at their fair value. The difference between the IFRS and Solvency II balance sheets is cash held by entities not consolidated on the Solvency II balance sheet. Amounts held in a money market fund are included as cash and cash equivalents on the IFRS balance sheet, but within investments in collective investments undertakings on the Solvency II balance sheet (US$29.9 million).

Deferred Acquisition Costs

Deferred acquisition costs are considered as part of the future cash flow projections used to value the Solvency II technical provisions and are valued at US$nil on the Solvency II balance sheet.

D.2 Technical provisions ("TPs")

The following table sets out the value of the Group's net technical provisions at 20 February 2022 and 20 February 2021:

	20 February 2022		20 February 2021	
	IFRS TPs US$M	Solvency II TPs US$M	IFRS TPs US$M	Solvency II TPs US$M
Gross Technical provisions	1,198.0	1,096.7	1,346.7	1,244.1
Reinsurance recoverables	(1,099.3)	(1,126.1)	(1,247.2)	(1,237.1)
Risk margin	N/a	13.9	N/a	20.0
Net Technical Provisions	**98.7**	**(15.5)**	**99.5**	**27.0**

The Group's technical provisions are in relation to business written under two lines of business, being Marine, Aviation and Transport (in relation to P&I, FD&D, Hull & Machinery and War risks underwritten) and Fire and other damage to property (in respect of the Aquaculture risks underwritten). The Group values TPs using the methodology prescribed by the Solvency II Directive and the Regulations made under that Directive. The TPs are made up of a best estimate of the claims, premiums and expense cash flows, which are then discounted to arrive at the necessary provisions. A specific risk margin is then added. The inclusion of future premiums, together with the high levels of reinsurance purchased by the Group, mean that reinsurance recoverables in the technical provisions can be in excess of the gross technical provisions, as is the case in the current year.

Similarly to the IFRS financial statements, there are a number of uncertainties inherent in the calculation of Solvency II technical provisions. The cash flows ultimately required to settle the net technical provisions are sensitive to a number of factors that can only be known for certain at the conclusion of a claim.

Claims

Gross and net claims are projected to their ultimate cost using standard actuarial techniques for material classes of business, including chain ladder modelling. Claims cash flows are calculated on a best estimate basis which involves removing the allowance for prudence allowed for in the IFRS financial statements.

Premiums

Future premiums receivable and reinsurance premiums payable in respect of incepted business are taken from the IFRS balance sheet. They are then split between premiums on earned business which is included in the claims provision, and premiums on unearned business which is included in the premiums provision.

Expenses

Allowance is made for the expenses that will be incurred in managing the run-off of the technical provisions at the balance sheet date. Claims handling, policy administration, depreciation, investment management and an element of overhead expenses are included in the provision. Some of these expenses are additional to those included in the calculation of the claims handling reserve in the IFRS financial statements.

Bound but not Incepted (BBNI) Business

The majority of North's insurance business is underwritten with an inception date of 20 February, meaning that at the year-end valuation date there is a significant amount of BBNI business. Provision is made for the future cash flows in relation to this business taking into account premiums, expected claims, and associated expenses expected to be incurred in the management of that business. This BBNI business is not included in the IFRS valuation of technical provisions.

Events not in Data (ENID)

Events not in data are modelled based on scenarios estimating the development of latent claims for an as yet unknown industrial disease, based in part on the development of asbestosis claims historically, and the modelling of a cyber attack. This modelling results in a percentage loading which is then added to both earned and unearned business to allow for ENIDs. No such provision is made in the IFRS valuation of technical provisions.

Reinsurer Bad Debt

The technical provisions include an allowance for reinsurer bad debt at the expected value based on reinsurance amounts outstanding, their duration, and the credit rating of the reinsurance counterparties.

Projected Cash Flows

Projected cash flows are estimated by applying historical payment patterns to the estimates of ultimate claims, premiums and expenses.

Discounting

Projected cash flows are discounted using the EIOPA prescribed risk-free interest rate term structure applicable to each currency for which technical provisions are calculated. IFRS technical provisions are not discounted.

Risk Margin

The risk margin represents the estimated cost of capital for an insurer taking on the technical provisions of the Group at the valuation date and running the provisions off to zero. The risk margin is calculated as the sum of the risk margins for each insurance and reinsurance undertaking consolidated in the Solvency II balance sheet. The risk margin for each insurance and reinsurance undertaking is recalculated at the valuation date and one year later on a run-off basis and is then projected forward on the assumption that the SCR runs-off in proportion to the best estimate technical provisions. A cost of capital of 6% is then applied to the SCR at each future date, with the corresponding costs discounted back to the valuation date to reflect the time value of money.

D.3 Other liabilities

The following table sets out the value of the Group's other liabilities at 20 February 2022 and 20 February 2021:

	20 February 2022		20 February 2021	
	IFRS Liabilities US$M	Solvency II Liabilities US$M	IFRS Liabilities US$M	Solvency II Liabilities US$M
Payables	114.1	84.7	138.2	57.8
Pension benefit obligations	15.7	15.7	46.7	46.7
Derivative financial instruments	-	0.1	-	-
Total other liabilities	**129.8**	**100.5**	**184.9**	**104.5**

The Group's other liabilities are recognised and valued for Solvency II purposes on the same basis as the IFRS financial statements.

Payables on the IFRS balance sheet include liabilities held by the Hydra North Cell and the brokerage subsidiaries which aren't consolidated on the Solvency II balance sheet. In addition, insurance and reinsurance payables are included in the future cash flow projections used to value technical provisions for Solvency II purposes, and so not included as payables on the Solvency II balance sheet.

The IAS 19 valuations of the defined benefit pension schemes included in the IFRS financial statements are considered to be an economic valuation of the net liability of the Group associated with the operation of the schemes. Further information on the valuation of the net obligations is included in the financial statements of the Group. The schemes require the Group to fund future payments to members of the schemes and as such exposes the group to the risk that the assets held by the schemes are insufficient to meet the scheme obligations as they fall due for payment. The following table sets out the value and nature of the pension scheme's assets at 20 February 2022 and 20 February 2021:

	20 February 2022 US$M	20 February 2021 US$M
Equities	47.3	49.6
Bonds	115.1	110.0
Other	10.5	-
Cash	2.2	15.5
Total	**175.1**	**175.1**

D.4 Alternative Valuation Methods

Alternative valuation methods as prescribed by the Solvency II regulations are used to value the investment in the Hydra North Cell and the land and buildings held by the Group – details are provided in section D.1 Assets.

D.5 Any Other Information

None.

E Capital Management (Audited)

E.1 Own Funds

The Group has a simple capital structure. IFRS balance sheet reserves comprise only tier 1 items derived from past underwriting and investment surpluses.

In addition to basic own funds, North have received PRA approval for a maximum of 50% of the SCR to be met using ancillary own funds ("AOFs"). These are included as tier 2 own funds. AOFs represent an allowance reflecting North's ability to make additional premium calls on its members in the event of a shortfall. The amount that can be included is calculated as a percentage of member's P&I premium making an appropriate allowance for default risk, or, if lower, an amount equal to 50% of the SCR. The current approval for AOFs was granted on 18 February 2020 and expires on 20 April 2023. In the event of an additional call, the additional own funds raised would form part of the Group's surplus and be included in tier one capital.

The Group's objective with respect to the management of own funds is to ensure that sufficient resources are available to cover 120% of the SCR at any point in time. The Group uses a five year planning horizon when managing own funds to ensure this level is maintained at all times.

Solvency II Own Funds at 20 February 2022 and 20 February 2021 are shown in the table below:

	20 Feb 2022 US$M	20 Feb 2021 US$M
Income & expenditure account	290.2	246.7
Contingency funds	38.2	41.8
Revaluation reserve	3.6	3.6
Non-controlling interest	0.2	0.2
Total IFRS Resources	**332.2**	**292.3**
Solvency II adjustments (including differing basis of consolidation)	(72.3)	(61.6)
Solvency II excess of assets over liabilities	**259.9**	**230.7**
Ring fenced funds	(5.2)	(0.5)
Tier 1 own funds	**254.7**	**230.2**
Ancillary own funds (Tier 2)	69.3	66.1
Total Solvency II Resources (Own Funds)	**324.0**	**296.3**

The reconciliation reserve consists of the Solvency II excess of assets over liabilities (US$259.9 million; 2021: US$230.7 million) less the adjustment for restricted own fund items in respect of ring-fenced funds (US$(5.2) million; 2021: US$(0.5) million).

Solvency II Adjustments

All differences included as Solvency II adjustments relate to the differing basis of consolidation and the valuation differences for assets and liabilities relative to the financial statements as set out in Section D Valuation for Solvency purposes.

Capital Transferability

The capital represented by the investment in Hydra Insurance Company Limited (the Cell) is not available to the Group to fully absorb losses on a going-concern basis. An adjustment has been made to Solvency II resources for this ring-fenced capital. The excess of assets over liabilities for the ring fenced fund is US$40.2 million, the adjustment of US$5.2 million represents this excess less the contribution of the ring fenced fund to the SCR of US$35.0 million.

All of the other assets of the Group are available to meet liabilities as and when they fall due, and therefore the Group has no other restrictions with regard to capital transferability.

E.2 Solvency Capital Requirement and Minimum Consolidated Group SCR

The following table shows an analysis of the Group's SCR split by risk modules at 20 February 2022 and 20 February 2021:

	20 Feb 2022 US$M	20 Feb 2021 US$M
Market risk	77.9	51.9
Counterparty default risk	42.7	58.8
Underwriting risk	20.6	23.4
Diversification	(25.6)	(30.5)
Basic SCR	**115.6**	**103.6**
Operational risk	23.0	28.9
Solvency Capital Requirement	**138.6**	**132.5**

The increase in market risk is primarily driven by an increase in equity risk on the investment in the Hydra North Cell given the increased Solvency II valuation of the Cell in the current year. The reduction in counterparty default risk is consistent with the decrease in asset balances at the current year end. The decrease in underwriting risk is a result of the decrease in reserving volumes given the reduction in the Solvency II technical provisions compared to the prior year.

An annual assessment of the appropriateness of the standard formula SCR to North is carried out. The last review, completed in November 2021, confirmed that the standard formula SCR was appropriate for all risks.

The final amount of the SCR, including the capital add-on, is subject to supervisory assessment.

Minimum Consolidated Group SCR

The Minimum Consolidated Group SCR is the sum of the MCRs of the insurance and reinsurance undertakings included in the Solvency II consolidation. This is US$40.5 million as at 20 February 2022.

Coverage of the SCR and Minimum Consolidated Group SCR

The following tables show the Group's coverage of the SCR and Minimum Consolidated Group SCR.

Coverage of SCR	**20 Feb 2022 US$M**	**20 Feb 2021 US$M**
Own funds	324.0	296.3
SCR	138.6	132.5
Coverage	185.4	163.8
% Coverage	234%	224%
Coverage of Minimum Consolidated Group SCR		
Own funds	254.7	230.2
Minimum Consolidated Group SCR	40.5	40.6
Coverage	214.2	189.6
% Coverage	628%	566%

E.3 Use of the Duration-Based Equity Risk Sub-Module in the Calculation of the SCR

The Group does not use the duration-based equity risk sub-module for the calculation of its SCR.

E.4 Differences Between the Standard Formula and any Internal Model Used

The Group does not use an internal model to calculate any part of its SCR.

E.5 Confirmation of Compliance with the SCR & Minimum Consolidated Group SCR

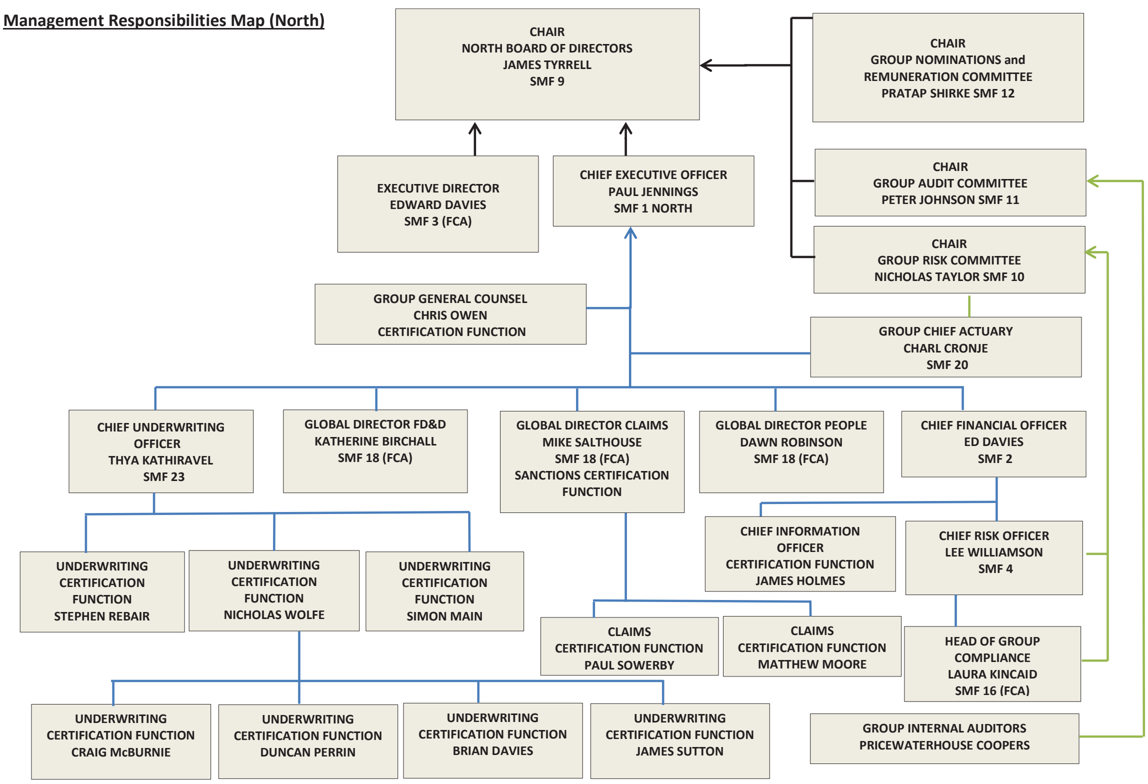
The Group has complied with the SCR and Minimum Consolidated Group SCR throughout the year.

E.6 Any Other Information

None.

Appendix 1 – Management Responsibilities Map
Senior Insurance Management Functions & Key Functions – Responsible Individuals and Reporting Lines

<u>**Management Responsibilities Map (North)**</u>



Reporting Lines

Reporting line to Board of Directors
Primary operational reporting line
Independent reporting line to Committee

Key

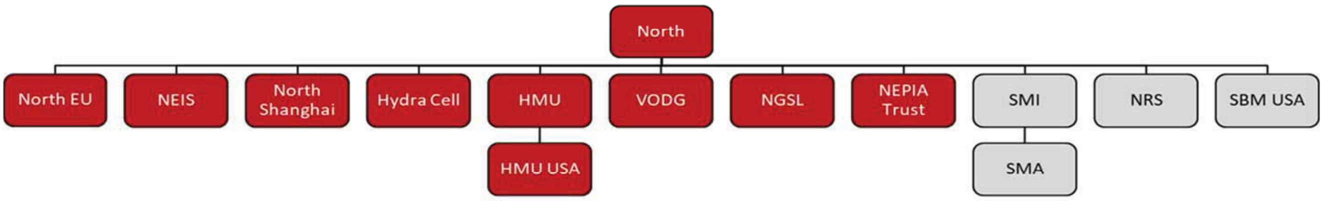
PRA Senior Management Functions
SMF 1 – Chief Executive Function
SMF 2 – Chief Finance Function
SMF 4 – Chief Risk Function
SMF 5 – Head of Internal Audit Function (Election for outsourcing applied as North not considered 'significant')
SMF 7 – Group Entity Senior Insurance Manager Function
SMF 9 – Chairman
SMF 10 – Chair of Risk Committee
SMF 11 – Chair of Audit Committee
SMF 12 – Chair of Remuneration Committee
SMF 20 – Chief Actuary Function
SMF 23 – Chief Underwriting Officer Function

FCA Senior Management Functions

SMF 3 – Executive Director
SMF 13 – Chair of Nominations Committee
SMF 16 –Compliance Oversight Function

SMF 18 – Other Overall Responsibility Function

Appendix 2 - Group Structure



Active

Dormant

* Excludes North's bermuda based parallel mutual company North of England Mutual Insurance Association Limited

Entity	Full name	Principal Activity	Registered Number	Domicile & LEI Number (if applicable)	Holding Percentage
NORTH	North of England Protecting and Indemnity Association Limited	Marine and aquaculture insurance	505456	England XJCO61LLUWTBTNWIXO 53	Group Parent Company
NORTH EU	North of England P&I Designated Activity Company (DAC)(North EU)	Marine and aquaculture insurance	628183	Ireland 635400AADIICESCVBE87	100% North
NORTH EU UK BRANCH	North of England P&I Designated Activity Company (UK Branch)	Claims and underwriting services provided to North EU from the UK. This is not a separate legal entity; it is a branch of North EU DAC.	831470	England (Branch)	N/A; North EU Branch
NEIS	North of England Insurance Services Inc.	Marketing and introduction of US business to North.	7008165	USA	100% North
NORTH SHANGHAI	North of England Marine Consultant (Shanghai) Ltd. Co.	Claims consultancy services for North & North EU	41000002201611180 030	China	100% North
NEPIA TRUST	NEPIA Trust Company Limited	Trustee of Group death in service schemes	03225823	England	100% North
SMI	Sunderland Marine Insurance Company Limited	Dormant. Former marine and aquaculture insurer	00016432	England 549300MOM633ONHV MI67	100% North
NGSL	North Group Services Limited	Employment of Group staff	03922841	England	100% North
HYDRA CELL	Hydra Insurance Company Limited (North Segregated Cell)	Segregated cell company involved in International Group reinsurance programme	34834	Bermuda	100% North Cell
SBM USA	Salvus Bain Management (USA) LLC	Former brokerage, currently in process of being wound up.	602311188	USA	100% North
VODG	Van Olst De Graaff & Co B.V.	Brokerage	24285533	Netherlands	91% North

Entity	Full name	Principal Activity	Registered Number	Domicile & LEI Number (if applicable)	Holding Percentage
HMU	Harlock Murray Underwriting Limited	Coverholder	142398	Canada	100% North
NRS	North Risk Services Limited	Dormant, retained for potential future business development	07277271	England	100% North
SMA	Sunderland Marine Africa Ltd	Marine Insurance, now de-registered and in process of being wound up	2005/025780/06	South Africa	100% SMI
HMU USA	Harlock Murray Underwriting LLC	Wholly owned subsidiary of HMU established for licensing purposes in USA	6174509	USA	100% HMU

Appendix 3 - Glossary of Terms

Basic SCR – The SCR before operational risk and capital add-ons

BBNI – Bound but not incepted. Refers to insurance contracts which the business is obliged to enter into where the inception date is after the valuation date

Combined ratio – claims incurred and expenses as a proportion of premiums

CRO – Chief Risk Officer

EIOPA – European Insurance and Occupational Pensions Authority

ENID – Events not in data. Refers to possible future insured events which have not previously occurred

ERM Committee – Enterprise Risk Management Committee

Expense ratio – an expression of expenses as a proportion of premiums

GRC – Group Risk Committee

IAS 19 – The international financial reporting standards for employee benefits, including defined benefit pension schemes

IFRS – International Financial Reporting Standards

IG – International Group of Protection & Indemnity Clubs, of which North is a member

IG Pool – A mechanism for members of the IG to pool their large claims

Loss ratio – an expression of claims incurred as a proportion of premiums

MCR – Minimum Capital Requirement

Minimum Consolidated Group SCR – The Group equivalent of the MCR, being the sum of the MCRs of the individual entities making up the Group.

ORSA – Own Risk and Solvency Assessment

Own Funds – the capital resources available to the Group

QRTs – Quantitative Reporting Templates

Reconciliation reserve – a component of own funds

SCR – Solvency Capital Requirement

SFCR - Solvency Financial Condition Report

SIMF – Senior Insurance Management Function

Standard Formula – the approach applied by the Group to calculate its SCR

Appendix 4 - SFCR Quantitative Templates

S.02.01.02	Balance Sheet
S.05.01.02	Premium, claims & expenses by line of business
S.05.02.01	Premium, claims & expenses by country
S.23.01.22	Own funds
S.25.01.22	Solvency Capital Requirement – for undertakings on Standard Formula
S.32.01.22	Undertakings in the scope of the group

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North of England Protecting & Indemnity Association Ltd

Solvency and Financial Condition Report

Disclosures

20 February

2022

(Monetary amounts in USD thousands)

General information

Participating undertaking name	North of England Protecting & Indemnity Association Ltd
Group identification code	XJCO61LLUWTBTNWIXO53
Type of code of group	LEI
Country of the group supervisor	GB
Language of reporting	en
Reporting reference date	20 February 2022
Currency used for reporting	USD
Accounting standards	IFRS
Method of Calculation of the group SCR	Standard formula
Method of group solvency calculation	Method 1 is used exclusively
Matching adjustment	No use of matching adjustment
Volatility adjustment	No use of volatility adjustment
Transitional measure on the risk-free interest rate	No use of transitional measure on the risk-free interest rate
Transitional measure on technical provisions	No use of transitional measure on technical provisions

List of reported templates

S.02.01.02 - Balance sheet

S.05.01.02 - Premiums, claims and expenses by line of business

S.05.02.01 - Premiums, claims and expenses by country

S.23.01.22 - Own Funds

S.25.01.22 - Solvency Capital Requirement - for groups on Standard Formula

S.32.01.22 - Undertakings in the scope of the group

S.02.01.02

Balance sheet

		Solvency II value
	Assets	C0010
R0030	Intangible assets	
R0040	Deferred tax assets	
R0050	Pension benefit surplus	
R0060	Property, plant & equipment held for own use	20,708
R0070	Investments (other than assets held for index-linked and unit-linked contracts)	198,323
R0080	*Property (other than for own use)*	0
R0090	*Holdings in related undertakings, including participations*	11,992
R0100	*Equities*	40,218
R0110	*Equities - listed*	
R0120	*Equities - unlisted*	40,218
R0130	*Bonds*	0
R0140	*Government Bonds*	0
R0150	*Corporate Bonds*	0
R0160	*Structured notes*	0
R0170	*Collateralised securities*	0
R0180	*Collective Investments Undertakings*	146,019
R0190	*Derivatives*	95
R0200	*Deposits other than cash equivalents*	0
R0210	*Other investments*	0
R0220	Assets held for index-linked and unit-linked contracts	
R0230	Loans and mortgages	0
R0240	*Loans on policies*	0
R0250	*Loans and mortgages to individuals*	
R0260	*Other loans and mortgages*	
R0270	Reinsurance recoverables from:	1,126,129
R0280	*Non-life and health similar to non-life*	1,126,129
R0290	*Non-life excluding health*	1,126,129
R0300	*Health similar to non-life*	
R0310	*Life and health similar to life, excluding index-linked and unit-linked*	0
R0320	*Health similar to life*	
R0330	*Life excluding health and index-linked and unit-linked*	
R0340	*Life index-linked and unit-linked*	
R0350	Deposits to cedants	0
R0360	Insurance and intermediaries receivables	21,588
R0370	Reinsurance receivables	8,906
R0380	Receivables (trade, not insurance)	15,673
R0390	Own shares (held directly)	
R0400	Amounts due in respect of own fund items or initial fund called up but not yet paid in	0
R0410	Cash and cash equivalents	79,583
R0420	Any other assets, not elsewhere shown	
R0500	**Total assets**	1,470,911

S.02.01.02

Balance sheet

		Solvency II value
	Liabilities	C0010
R0510	Technical provisions - non-life	1,110,602
R0520	*Technical provisions - non-life (excluding health)*	1,110,602
R0530	*TP calculated as a whole*	
R0540	*Best Estimate*	1,096,684
R0550	*Risk margin*	13,918
R0560	*Technical provisions - health (similar to non-life)*	0
R0570	*TP calculated as a whole*	
R0580	*Best Estimate*	
R0590	*Risk margin*	
R0600	Technical provisions - life (excluding index-linked and unit-linked)	0
R0610	*Technical provisions - health (similar to life)*	0
R0620	*TP calculated as a whole*	
R0630	*Best Estimate*	
R0640	*Risk margin*	
R0650	*Technical provisions - life (excluding health and index-linked and unit-linked)*	0
R0660	*TP calculated as a whole*	
R0670	*Best Estimate*	
R0680	*Risk margin*	
R0690	Technical provisions - index-linked and unit-linked	0
R0700	*TP calculated as a whole*	
R0710	*Best Estimate*	
R0720	*Risk margin*	
R0740	Contingent liabilities	
R0750	Provisions other than technical provisions	
R0760	Pension benefit obligations	15,651
R0770	Deposits from reinsurers	
R0780	Deferred tax liabilities	
R0790	Derivatives	136
R0800	Debts owed to credit institutions	
R0810	Financial liabilities other than debts owed to credit institutions	
R0820	Insurance & intermediaries payables	14,795
R0830	Reinsurance payables	14,086
R0840	Payables (trade, not insurance)	55,735
R0850	Subordinated liabilities	0
R0860	*Subordinated liabilities not in BOF*	
R0870	*Subordinated liabilities in BOF*	0
R0880	Any other liabilities, not elsewhere shown	
R0900	**Total liabilities**	1,211,005
R1000	**Excess of assets over liabilities**	259,906

S.05.01.02
Premiums, claims and expenses by line of business

Non-life

		Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)												Line of business for: accepted non-proportional reinsurance				Total
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Misc. financial loss	Health	Casualty	Marine, aviation and transport	Property	
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0200
	Premiums written																	
R0110	Gross - Direct Business						407,683	16,735										424,418
R0120	Gross - Proportional reinsurance accepted						751											751
R0130	Gross - Non-proportional reinsurance accepted																	0
R0140	Reinsurers' share						355,130	15,335										370,465
R0200	Net						53,305	1,399										54,704
	Premiums earned																	
R0210	Gross - Direct Business						410,155	18,118										428,273
R0220	Gross - Proportional reinsurance accepted						751											751
R0230	Gross - Non-proportional reinsurance accepted																	0
R0240	Reinsurers' share						332,792	16,266										349,057
R0300	Net						78,114	1,853										79,967
	Claims incurred																	
R0310	Gross - Direct Business						438,764	29,805										468,569
R0320	Gross - Proportional reinsurance accepted						1,032											1,032
R0330	Gross - Non-proportional reinsurance accepted																	0
R0340	Reinsurers' share						384,879	24,028										408,907
R0400	Net						54,917	5,777										60,694
	Changes in other technical provisions																	
R0410	Gross - Direct Business																	0
R0420	Gross - Proportional reinsurance accepted																	0
R0430	Gross - Non-proportional reinsurance accepted																	0
R0440	Reinsurers' share																	0
R0500	Net						0	0										0
R0550	**Expenses incurred**						-3,231	-27										-3,258
R1200	**Other expenses**																	465
R1300	**Total expenses**																	-2,793

S.05.02.01

Premiums, claims and expenses by country

Non-life

		C0010	C0020	C0030	C0040	C0050	C0060	C0070
		Home Country	Top 5 countries (by amount of gross premiums written) - non-life obligations			Top 5 countries (by amount of gross premiums written) - non-life obligations		Total Top 5 and home country
R0010			IE					
		C0080	C0090	C0100	C0110	C0120	C0130	C0140
	Premiums written							
R0110	Gross - Direct Business	259,546	164,872					424,418
R0120	Gross - Proportional reinsurance accepted	751						751
R0130	Gross - Non-proportional reinsurance accepted							0
R0140	Reinsurers' share	212,189	158,276					370,465
R0200	Net	48,108	6,596					54,704
	Premiums earned							
R0210	Gross - Direct Business	261,236	167,037					428,273
R0220	Gross - Proportional reinsurance accepted	751						751
R0230	Gross - Non-proportional reinsurance accepted							0
R0240	Reinsurers' share	196,437	152,621					349,057
R0300	Net	65,550	14,417					79,967
	Claims incurred							
R0310	Gross - Direct Business	225,849	242,719					468,569
R0320	Gross - Proportional reinsurance accepted	1,032						1,032
R0330	Gross - Non-proportional reinsurance accepted							0
R0340	Reinsurers' share	175,304	233,603					408,907
R0400	Net	51,577	9,116					60,694
	Changes in other technical provisions							
R0410	Gross - Direct Business							0
R0420	Gross - Proportional reinsurance accepted							0
R0430	Gross - Non-proportional reinsurance accepted							0
R0440	Reinsurers' share							0
R0500	Net	0	0					0
R0550	**Expenses incurred**	-430	-2,828					-3,258
R1200	**Other expenses**							465
R1300	**Total expenses**							-2,793

S.23.01.22

Own Funds

	Basic own funds before deduction for participations in other financial sector	Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
R0010	Ordinary share capital (gross of own shares)	0	0		0	
R0020	*Non-available called but not paid in ordinary share capital at group level*	0				
R0030	Share premium account related to ordinary share capital	0	0		0	
R0040	Initial funds, members' contributions or the equivalent basic own-fund item for mutual and mutual-type undertakings	0	0		0	
R0050	Subordinated mutual member accounts	0		0	0	0
R0060	*Non-available subordinated mutual member accounts at group level*	0				
R0070	Surplus funds	0	0			
R0080	*Non-available surplus funds at group level*	0	0			
R0090	Preference shares	0		0	0	0
R0100	*Non-available preference shares at group level*	0				
R0110	Share premium account related to preference shares	0		0	0	0
R0120	*Non-available share premium account related to preference shares at group level*	0				
R0130	Reconciliation reserve	254,672	254,672			
R0140	Subordinated liabilities	0		0	0	0
R0150	*Non-available subordinated liabilities at group level*	0				
R0160	An amount equal to the value of net deferred tax assets	0				0
R0170	*The amount equal to the value of net deferred tax assets not available at the group level*	0				0
R0180	Other items approved by supervisory authority as basic own funds not specified above	0	0	0	0	0
R0190	*Non available own funds related to other own funds items approved by supervisory authority*	0				
R0200	Minority interests (if not reported as part of a specific own fund item)	0				
R0210	*Non-available minority interests at group level*	0				
R0220	**Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds**					
R0230	**Deductions for participations in other financial undertakings, including non-regulated undertakings carrying out financial activities**	0				
R0240	*whereof deducted according to art 228 of the Directive 2009/138/EC*	0				
R0250	Deductions for participations where there is non-availability of information (Article 229)	0				
R0260	Deduction for participations included by using D&A when a combination of methods is used	0				
R0270	**Total of non-available own fund items**	0	0	0	0	0
R0280	**Total deductions**	0	0	0	0	0
R0290	**Total basic own funds after deductions**	254,672	254,672	0	0	0
	Ancillary own funds					
R0300	Unpaid and uncalled ordinary share capital callable on demand	0				
R0310	Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	0				
R0320	Unpaid and uncalled preference shares callable on demand	0				
R0330	A legally binding commitment to subscribe and pay for subordinated liabilities on demand	0				
R0340	Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	0				
R0350	Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	0				
R0360	Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	0				
R0370	Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	73,754			73,754	
R0380	Non available ancillary own funds at group level	0				
R0390	Other ancillary own funds	0				
R0400	**Total ancillary own funds**	73,754			73,754	0
	Own funds of other financial sectors					
R0410	Credit Institutions, investment firms, financial institutions, alternative investment fund managers, UCITS management companies	0				
R0420	Institutions for occupational retirement provision	0				
R0430	Non regulated entities carrying out financial activities	0				
R0440	**Total own funds of other financial sectors**	0	0	0	0	0

S.23.01.22

Own Funds

	Basic own funds before deduction for participations in other financial sector	Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
	Own funds when using the D&A, exclusively or in combination of method 1					
R0450	Own funds aggregated when using the D&A and combination of method	0				
R0460	Own funds aggregated when using the D&A and combination of method net of IGT	0				
R0520	Total available own funds to meet the consolidated group SCR (excluding own funds from other financial sector and from the undertakings included via D&A)	328,426	254,672	0	73,754	0
R0530	Total available own funds to meet the minimum consolidated group SCR	254,672	254,672	0	0	
R0560	Total eligible own funds to meet the consolidated group SCR (excluding own funds from other financial sector and from the undertakings included via D&A)	323,967	254,672	0	69,295	0
R0570	Total eligible own funds to meet the minimum consolidated group SCR (group)	254,672	254,672	0	0	
R0610	**Minimum consolidated Group SCR**	40,500				
R0650	**Ratio of Eligible own funds to Minimum Consolidated Group SCR**	628.82%				
R0660	**Total eligible own funds to meet the group SCR (including own funds from other financial sector and from the undertakings included via D&A)**	323,967	254,672	0	69,295	0
R0680	**Group SCR**	138,589				
R0690	**Ratio of Eligible own funds to group SCR including other financial sectors and the undertakings included via D&A**	233.76%				

	Reconcilliation reserve	C0060
R0700	Excess of assets over liabilities	259,906
R0710	Own shares (held directly and indirectly)	
R0720	Forseeable dividends, distributions and charges	
R0730	Other basic own fund items	0
R0740	Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	5,234
R0750	Other non available own funds	
R0760	**Reconciliation reserve**	254,672
	Expected profits	
R0770	Expected profits included in future premiums (EPIFP) - Life business	
R0780	Expected profits included in future premiums (EPIFP) - Non- life business	9,359
R0790	**Total Expected profits included in future premiums (EPIFP)**	9,359

S.25.01.22

Solvency Capital Requirement - for groups on Standard Formula

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0120
R0010	Market risk	56,793		
R0020	Counterparty default risk	62,162		
R0030	Life underwriting risk	0		
R0040	Health underwriting risk	0		
R0050	Non-life underwriting risk	30,040		
R0060	Diversification	-37,292		
R0070	Intangible asset risk	0		
R0100	**Basic Solvency Capital Requirement**	111,702		

USP Key

For life underwriting risk:
1 - Increase in the amount of annuity benefits
9 - None

For health underwriting risk:
1 - Increase in the amount of annuity benefits
2 - Standard deviation for NSLT health premium risk
3 - Standard deviation for NSLT health gross premium risk
4 - Adjustment factor for non-proportional reinsurance
5 - Standard deviation for NSLT health reserve risk
9 - None

For non-life underwriting risk:
4 - Adjustment factor for non-proportional reinsurance
6 - Standard deviation for non-life premium risk
7 - Standard deviation for non-life gross premium risk

	Calculation of Solvency Capital Requirement	C0100
R0130	Operational risk	23,031
R0140	Loss-absorbing capacity of technical provisions	0
R0150	Loss-absorbing capacity of deferred taxes	0
R0160	Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	0
R0200	**Solvency Capital Requirement excluding capital add-on**	134,733
R0210	Capital add-ons already set	0
R0220	**Solvency capital requirement for undertakings under consolidated method**	138,589
	Other information on SCR	
R0400	Capital requirement for duration-based equity risk sub-module	0
R0410	Total amount of Notional Solvency Capital Requirements for remaining part	0
R0420	Total amount of Notional Solvency Capital Requirements for ring fenced funds	0
R0430	Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	0
R0440	Diversification effects due to RFF nSCR aggregation for article 304	0
R0470	Minimum consolidated group solvency capital requirement	40,500
	Information on other entities	
R0500	Capital requirement for other financial sectors (Non-insurance capital requirements)	0
R0510	*Credit institutions, investment firms and financial institutions, alternative investment funds managers, UCITS management companies*	0
R0520	*Institutions for occupational retirement provisions*	0
R0530	*Capital requirement for non- regulated entities carrying out financial activities*	0
R0540	Capital requirement for non-controlled participation requirements	0
R0550	Capital requirement for residual undertakings	3,856
	Overall SCR	
R0560	SCR for undertakings included via D&A	0
R0570	**Solvency capital requirement**	138,589

S.32.01.22

Undertakings in the scope of the group

Row	Country	Identification code of the undertaking	Type of code of the ID of the undertaking	Legal Name of the undertaking	Type of undertaking	Legal form	Category (mutual/ non mutual)	Supervisory Authority
	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080
1	GB	XJCO61LLUWTBTNWIXO53	LEI	North of England Protecting & Indemnity Association Limited	Non life insurance undertaking	Company Limited by Guarantee	Mutual	Prudential Regulatory Authority
2	GB	549300MOM633ONHVMI67	LEI	Sunderland Marine Insurance Co Ltd	Non life insurance undertaking	Company Limited by Guarantee	Non-mutual	Prudential Regulatory Authority
3	IE	635400AADIICESCVBE87	LEI	North of England P&I DAC	Non life insurance undertaking	Company	Mutual	Central Bank of Ireland
4	SA	SMA	Specific code	Sunderland Marine (Africa) Limited	Other	Company	Non-mutual	
5	CN	North Shanghai	Specific code	North of England Marine Consultant (Shanghai) Ltd Co.	Other	Company	Non-mutual	
6	GB	NEPIA Trust	Specific code	NEPIA Trust Company Limited	Other	Company	Non-mutual	
7	GB	BSA	Specific code	British Shipowners Association	Other	Company	Non-mutual	
8	GB	North Law	Specific code	North Law Limited	Other	Company	Non-mutual	
9	GB	North Legal	Specific code	North Legal Limited	Other	Company	Non-mutual	
10	NL	VODG	Specific code	Van Olst de Graaf & Co BV	Other	Company	Non-mutual	
11	CA	HMU	Specific code	Harlock Murray Underwriting Limited	Other	Company	Non-mutual	
12	US	SBM USA	Specific code	Salvus Bain Management (USA) LLC	Other	Company	Non-mutual	
13	US	HMU USA	Specific code	Harlock Murray Underwriting LLC	Other	Company	Non-mutual	
14	GB	ARM	Specific code	Aquaculture Risk (Management) Limited	Other	Company	Non-mutual	
15	GB	NGS	Specific code	North Group Services Limited	Other	Company	Non-mutual	
16	US	NIS	Specific code	North Insurance Services Limited	Other	Company	Non-mutual	

S.32.01.22

Undertakings in the scope of the group

					Criteria of influence						Inclusion in the scope of Group supervision		Group solvency calculation
	Country	Identification code of the undertaking	Type of code of the ID of the undertaking	Legal Name of the undertaking	% capital share	% used for the establishment of consolidated accounts	% voting rights	Other criteria	Level of influence	Proportional share used for group solvency calculation	YES/NO	Date of decision if art. 214 is applied	Method used and under method 1, treatment of the undertaking
Row	C0010	C0020	C0030	C0040	C0180	C0190	C0200	C0210	C0220	C0230	C0240	C0250	C0260
1	GB	XJCO61LLUWTBTNWIXO53	LEI	North of England Protecting & Indemnity Association Limited							Included in the scope		Method 1: Full consolidation
2	GB	549300MOM633ONHVMI67	LEI	Sunderland Marine Insurance Co Ltd	100.00%	100.00%	100.00%		Dominant	100.00%	Included in the scope		Method 1: Full consolidation
3	IE	635400AADIICESCVBE87	LEI	North of England P&I DAC	100.00%	100.00%	100.00%		Dominant	100.00%	Included in the scope		Method 1: Full consolidation
4	SA	SMA	Specific code	Sunderland Marine (Africa) Limited	100.00%	100.00%	100.00%		Dominant	100.00%	Included in the scope		Method 1: Adjusted equity method
5	CN	North Shanghai	Specific code	North of England Marine Consultant (Shanghai) Ltd Co.	100.00%	100.00%	100.00%		Dominant	100.00%	Included in the scope		Method 1: Adjusted equity method
6	GB	NEPIA Trust	Specific code	NEPIA Trust Company Limited	100.00%	100.00%	100.00%		Dominant	100.00%	Included in the scope		Method 1: Adjusted equity method
7	GB	BSA	Specific code	British Shipowners Association	100.00%	100.00%	100.00%		Dominant	100.00%	Included in the scope		Method 1: Adjusted equity method
8	GB	North Law	Specific code	North Law Limited	100.00%	100.00%	100.00%		Dominant	100.00%	Included in the scope		Method 1: Adjusted equity method
9	GB	North Legal	Specific code	North Legal Limited	100.00%	100.00%	100.00%		Dominant	100.00%	Included in the scope		Method 1: Adjusted equity method
10	NL	VODG	Specific code	Van Olst de Graaf & Co BV	91.00%	100.00%	91.00%		Dominant	91.00%	Included in the scope		Method 1: Adjusted equity method
11	CA	HMU	Specific code	Harlock Murray Underwriting Limited	100.00%	100.00%	100.00%		Dominant	100.00%	Included in the scope		Method 1: Adjusted equity method
12	US	SBM USA	Specific code	Salvus Bain Management (USA) LLC	100.00%	100.00%	100.00%		Dominant	100.00%	Included in the scope		Method 1: Adjusted equity method
13	US	HMU USA	Specific code	Harlock Murray Underwriting LLC	100.00%	100.00%	100.00%		Dominant	100.00%	Included in the scope		Method 1: Adjusted equity method
14	GB	ARM	Specific code	Aquaculture Risk (Management) Limited	100.00%	100.00%	100.00%		Dominant	100.00%	Included in the scope		Method 1: Adjusted equity method
15	GB	NGS	Specific code	North Group Services Limited	100.00%	100.00%	100.00%		Dominant	100.00%	Included in the scope		Method 1: Adjusted equity method
16	US	NIS	Specific code	North Insurance Services Limited	100.00%	100.00%	100.00%		Dominant	100.00%	Included in the scope		Method 1: Adjusted equity method

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