

# Group Solvency & Financial Condition Report 2020

Atlas Holdings Limited

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# **Atlas Holdings Limited**

**Solvency and Financial Condition Report**  
**for the Financial Year ended 31 December 2020**



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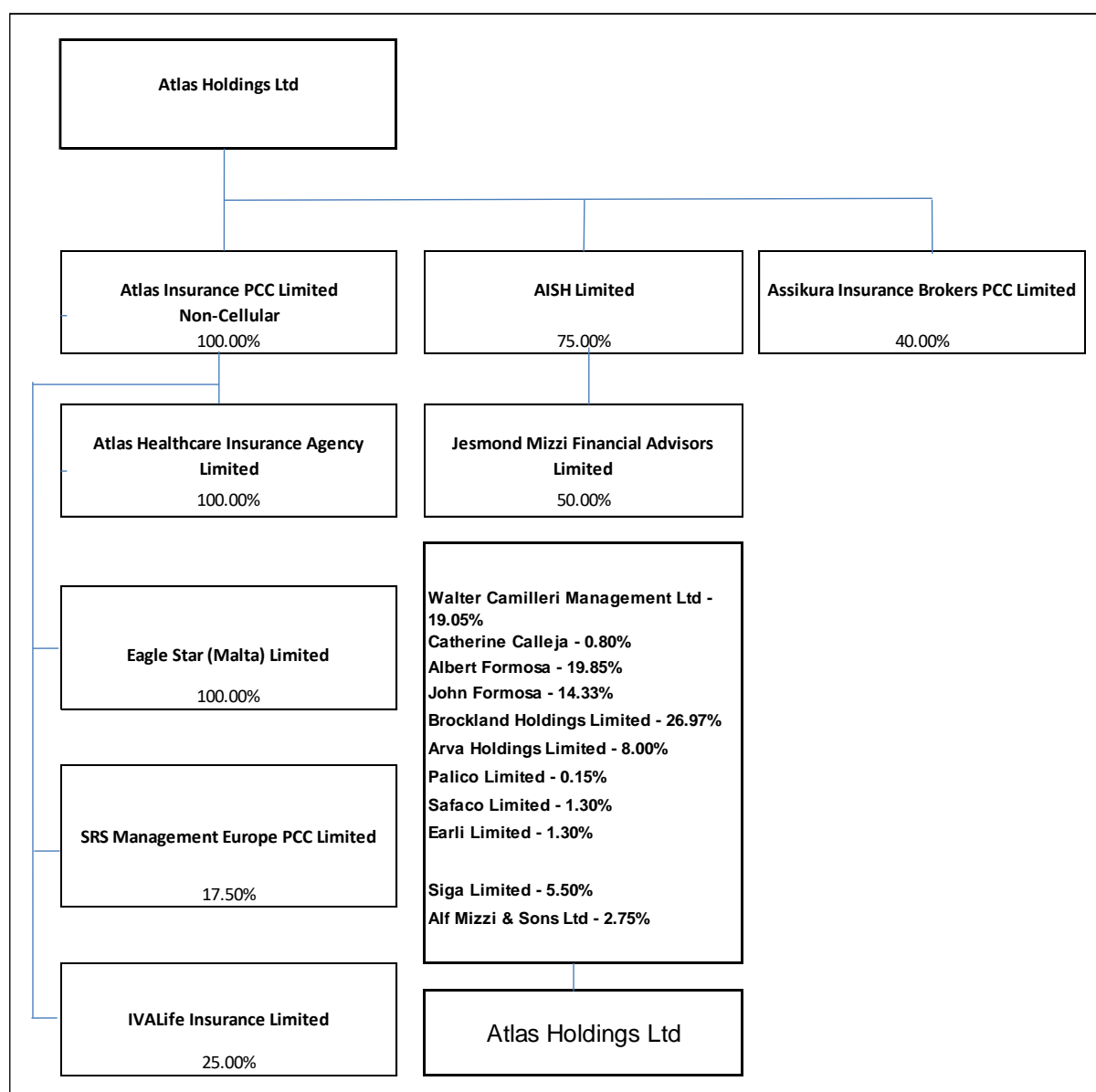
## 1. Executive summary

The Solvency and Financial Condition Report (SFCR) is presented in line with the requirements of Directive 2009/138/EC (Solvency II Directive) and the Commission Delegated Regulation (EU) 2015/35.

## 1.1 Business and Performance

Atlas Holdings Limited (the Company, the Atlas Group, the Group) is principally engaged in the holding of investments with a particular interest in insurance. The Atlas Group has been captured for Group Supervision under the Solvency II Directive which came in to force as on the 1 January 2016. As such this report is intended to satisfy compliance with Group Supervisory requirements under such regulation while also reporting on Atlas Insurance PCC Limited, a Protected Cell Company (the PCC, the Solo Undertaking) non-cellular results for the year under review. For the purposes of this report the non-cellular assets of the PCC are referred to as “Core” assets.

The Atlas Group’s corporate structure is demonstrated in the following organogram:



In view that Atlas Holdings Limited or its subsidiaries do not hold a controlling interest in, Assikura Insurance Brokers Limited, Jesmond Mizzi Financial Services Limited and IVALife Insurance Limited, the equity held for these companies is recognised in these results as on 31 December 2020 as being those of an Associate.

On the 29 October 2020 SRS Management Europe PCC Limited allotted further shares to its controlling shareholder Strategic Risk Solutions (SRS Europe) Limited and as such the Solo's shareholding reduced to 17.5%.

### **Atlas Holdings Limited**

Atlas Holdings Limited receives dividend income from its equity investment in its controlled subsidiaries or from its associate companies. During the year under review the Company received dividends before taxation totalling €1,891,346 (2019: €2,273,077). The Company reports a profit before tax of €1,886,073 (2019: €2,224,957).

The Board of Directors implements a Group wide dividend policy to ensure that dividend distribution does not compromise the Group's strength in matching its Solvency Margin under Solvency II regulation. As on 31 December 2020 the Company reports shareholder funds totalling €13,026,043 (2019: €12,801,941).

### **Atlas Group and its subsidiaries**

The Atlas Group's consolidated financial statements consider the results and financial positions of the holding company and its subsidiaries and associate companies. These include Atlas Insurance PCC Limited, Atlas Healthcare Insurance Agency Limited, Eagle Star (Malta) Limited, and AISH Limited, besides three associate companies, Jesmond Mizzi Financial Advisors Limited, Assikura Insurance Brokers PCC Limited, and IVALife Insurance Limited. In consolidating the results for the Atlas Group, Atlas Insurance PCC Limited only reports the results for the non-cellular operations and financial positions. The Cells' results and financial positions included within the Atlas Insurance PCC Limited annual accounts are discarded for the purpose of accounting under International Financial Reporting Standards (IFRS) since such results do not form part of the Atlas Group results.

Throughout this report the quantitative tables being reproduced also include results being reported separately for the Cells attaching to the PCC. Cells that have recourse to the PCC's Core Own Funds, under consolidation Solvency II principles, have recourse to the consolidated Own Funds Reserves of the Group.

The regulated Quantitative Reporting Templates (QRT's) being reproduced in this report will only state positions for the Group and for the PCC's Aggregate Position.

### **COVID-19 Pandemic**

The spread of Covid-19 across the globe from the beginning of the financial year 2020 has had a significant economic impact both world-wide and locally. The virus was first detected in Malta in the beginning of March last year. The Atlas Group continues to be vigilant about the recent developments of the pandemic and the negative impact this is having on the local and global economies. It is committed to managing the Group's positions during 2021 as it has during 2020.

During the COVID-19 period, the roll out of the Group's Business Continuity Plan (BCP) has assisted the respective executive in largely reaching budget objectives for 2020. The investment into a resilient BCP as an integral part of the good governance procedures implemented by the Group over the years has paid off in enabling the Atlas Group to reach its targets regardless of the crisis scenario.

The Group reports a profit before tax of €7,064,403 (2019: €9,267,887) of which profit after tax of €4,812,514 (2019: €6,098,875) is attributable to the owners of the Holding Company.



**Atlas Insurance PCC Limited** is the flagship company within the Atlas group of companies specialising in insurance underwriting and insurance services. The PCC is also authorised by the Malta Financial Services Authority (MFSA) to underwrite reinsurance business.

Atlas was authorised on the 29 April 2004 by the MFSA to carry on business in the following Insurance Classes of Business:

- Class 1 – Accident,
- Class 2 – Sickness,
- Class 3 – Land Vehicles,
- Class 6 – Ships,
- Class 7 – Goods in Transit,
- Class 8 – Fire and Natural Forces,
- Class 9 – Other Damage to Property,
- Class 10 – Motor Vehicle Liability,
- Class 12 – Liability for Ships,
- Class 13 – General Liability,
- Class 16 – Miscellaneous Financial Loss,
- Class 17 – Legal Expenses, and
- Class 18 – Assistance.

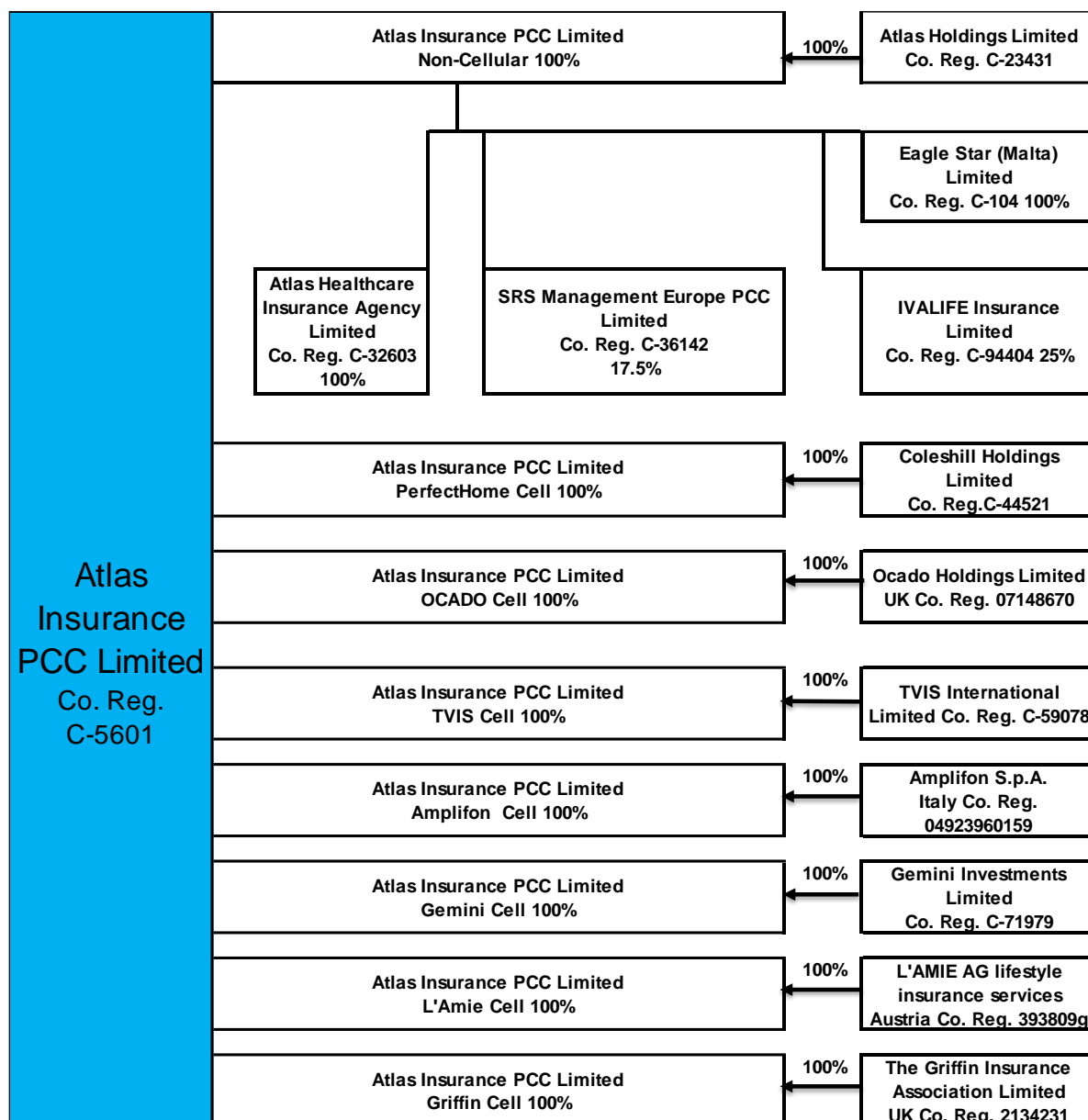
The Solo Undertaking was further authorised by the MFSA to convert to a Protected Cell company on the 1 November 2006, and later, on 11 June 2009, the MFSA reissued its authorisation to also carry on Reinsurance Business under its licence.

The PCC underwrites local insurance risk through its non-cellular structure and is a leader in the local market. When including its international cellular premium turnover, Atlas is Malta's second largest insurer by premium income.

The Companies Act (Cell Companies Carrying on Business of Insurance) Regulations determine under article 9 (1) that "the assets of a cell company shall be either cellular assets or non-cellular assets". In accordance with article 9 (2) of the same regulations, the Directors of the Solo Undertaking are obliged to keep: "(a) cellular assets separate and separately identifiable from non-cellular assets; (b) cellular assets attributable to each cell separate and separately identifiable from cellular assets attributable to other cells; and (c) separate records, accounts, statements and other documents as may be necessary to evidence the assets and liabilities of each cell as distinct and separate from the assets and liabilities of other cells in the same company." For the purposes of this report the non-cellular assets are referred to as "Core" assets.

Therefore, within the PCC, the core assets comprise the assets of the PCC which are non-cellular assets relating to the core operation. The assets of the PCC are either core assets or cellular assets. The assets attributable to a cell comprise assets represented by the proceeds of cell share capital, reserves and other assets attributable to the cell.

The PCC underwrites (re)insurance risk through both its Core Activity and its Cellular Activity. The PCC's corporate structure is represented as follows:



By year end 2020 the PCC incorporated a new cell, the Griffin Cell which is wholly owned by The Griffin Insurance Association Limited, a mutual insurance company seeking underwriting capabilities within the EU. The Cell has enabled the possibility to underwrite European Professional Indemnity insurance risk across EU and EEA countries through its incorporation.

### Environmental Social Governance (ESG)

The COVID-19 pandemic period has deepened our commitment to corporate sustainability. Our resolve to maximise value for our stakeholders and meet their needs must not compromise the ability of future generations to meet theirs. During the period we have researched various methodologies to work towards reducing our carbon footprint and during the next period a determined cross functional team will be setting more concrete direction across our organisation. Furthermore, without the support of our people this initiative but also our entire social responsibility programme, cannot move ahead. We truly believe that

our engagement scores are dependent on our staff's support of our core values which are reflected in how we contribute to society.

Total premium income for the PCC as a whole and split by Geographical area is reported in the below table:

Premim Written by Geographical Area	Northern Europe		Western Europe		Southern Europe		Total	
	Euro 2020	Euro 2019	Euro 2020	Euro 2019	Euro 2020	Euro 2019	Euro 2020	Euro 2019
Core	-	-	-	-	42,077,465	40,573,438	42,077,465	40,573,438
Amplifon Cell	-	-	-	-	-	-	-	-
Other Cells	4,817,079	4,324,545	18,400,269	19,497,612	-	-	23,217,348	23,822,157
<b>Total</b>	<b>4,817,079</b>	<b>4,324,545</b>	<b>18,400,269</b>	<b>19,497,612</b>	<b>42,077,465</b>	<b>40,573,438</b>	<b>65,294,813</b>	<b>64,395,595</b>
Percentage Share of Total Premium	7%	7%	28%	30%	64%	62%	100%	100%

### PCC Core Results

The PCC, through its Core, underwrites a balanced local general insurance business portfolio. During 2020, the PCC faced the challenges of the COVID-19 pandemic and, notwithstanding the potential threats this caused to the Maltese economy, the Core continued to register good growth in premium income, albeit less than originally budgeted. The pandemic environment causing stress on the local and worldwide economies did in fact have an effect on the Core's claims experience during 2020. Inevitably, travel restrictions and the general slowdown in the local economy caused spikes in losses incurred in related classes of insurance risk that the Core underwrites. That said, the Core did continue to register positive technical results arising from the prudence applied in its underwriting and in particular due to its reinsurance programme arrangements.

Premium Written	Motor		Non-Motor		Total		Motor Share		Non-Motor Share	
	Euro		Euro		Euro					
<b>2020</b>	<b>13,043,452</b>		<b>29,034,012</b>		<b>42,077,465</b>		<b>31%</b>		<b>69%</b>	
2019	12,756,723		27,816,715		40,573,438		31%		69%	
<b>Percentage Growth for 2020</b>	<b>2%</b>		<b>4%</b>		<b>4%</b>					

2020 premium written for the Core increased by 4% over the previous year. Overall positive technical results are reported for the year notwithstanding a number of factors arising from COVID-19 which impacted these results. In summary, these were:

- a material drop in premium income for the Travel Class resulting from the difficulties the travel industry experienced during the year impacting the personal lines portfolio;
- a spike in claims for cancellations of travel bookings;
- a spike in claims for the commercial property class.

As stated above, the resulting losses experienced for claims incurred were mitigated by the robust reinsurance arrangements in place.

In addition, the prudent technical practices in underwriting insurance risk put into place over the years allowed for the PCC to surpass its budget expectations for technical results.

The Motor and Health classes continue to produce positive technical results for the year under review which combine well with good results in other classes. This resulted in a combined loss ratio of 83% (2019: 80%) across the Core's full portfolio.

The following table reports the Core's Gross loss ratios before reinsurance expenses.

Gross Claims Loss Ratio	Motor		Non-Motor		Total	
	Euro	Euro	Euro	Euro	Euro	Euro
	2020	2019	2020	2019	2020	2019
Premium Earned	12,835,255	12,376,934	28,482,304	23,815,121	41,317,559	36,192,055
Claims Incurred	5,159,719	6,066,584	16,370,643	15,703,900	21,530,361	21,770,484
Gross Ratio	40%	49%	57%	66%	52%	60%

The Core reinsures the insurance business risk it underwrites with a pool of highly rated reinsurers of international repute. Health insurance risk underwritten is reinsured with AXA PPP healthcare Limited.

During 2020 the Core registered a Gross Claims Loss Ratio of 52% decreasing to 41% after reinsurance costs. Aggregate gross claims registered during the year are reported at similar levels as those of 2019 (€21,770,484) and this is being reported for 2020 at €21,530,361.

The net claims incurred figure for 2020 is reported at €8,169,126, decreasing from that of 2019 of €9,500,708. This decrease in net claims costs results from the efficacy of the reinsurance programmes in place which protect classes of business reinsured on a proportionate participation of reinsurers. In the below table the net claims position retained by the Core is being noted.

Net Claims Loss Ratio	Total	
	Euro	Euro
	2020	2019
Net Premium Earned	19,895,347	18,425,616
Net Claims Incurred	8,169,126	9,500,708
Net Ratio	41%	52%

During the year under review, the prudent structuring of the PCC's investment portfolio ultimately proved to be resilient enough to sustain the volatility and losses experienced in both the property and securities markets, recovering well by year end from the material losses incurred in spring 2020.

The Solo Undertaking continues to apply an investment policy which allows for reasonable return on investment while ensuring a prudent spread in its allocation, and largely placing investments in high grade securities.

The investment portfolio held in the Core's balance sheet at year end 2020 totalled €46,056,014, 2019 - €46,421,383. The decrease in the portfolio results from the disposal of an investment property which is partially offset by a further injection of free cash. The reinvestment of realised income also contributed toward the PCC's strategy return on the investment portfolio.

The positive result for technical operations was augmented by the marginal investment return results. Profits before tax in 2020 amounted to €7,080,257 compared to a prior year profit before tax of €9,674,992, increasing the total equity of the Core to €38,653,747 at year end from €34,823,420 at the beginning of the year under review.

The Solo Undertaking owns 25% of an associate company, IVALIFE Insurance Limited, an insurance undertaking authorised by the MFSA to underwrite Long Term classes of Business, and also holds equity investment in SRS Management Europe PCC Limited. Both these companies are not considered to be subsidiaries and as such, in view that the Solo Undertaking does not hold a controlling interest, the results are recognised as being those of equity investment for dividend income received from the entities.

The results for the two daughter companies, Atlas Healthcare Insurance Agency Limited and Eagle Star (Malta) Limited, are not consolidated in the PCC's accounts and are recognised in Atlas' Financial Statements and Solvency II Balance Sheet as investments held in subsidiaries. These two companies'

results are then consolidated in the Group Consolidation of the ultimate parent, Atlas Holdings Limited.

### **PCC Non-Cellular - Cells**

The PCC had seven Cells incorporated within its structure as on 31 December 2020; the PerfectHome Cell, the Ocado Cell, the TVIS Cell, the Amplifon Cell, the Gemini Cell, the L'Amie Cell and the Griffin Cell.

In accordance with the Companies Act regulations and Insurance Business Act rules all Cellular Assets are segregated (ring fenced) one from the other and from the Core, whereas all Cells have recourse to the Core's assets once their own assets have been exhausted. There is one exception currently on the PCC's books, that of the Amplifon Cell that of the Amplifon Cell where a non-recourse arrangement is in place. The Companies Act (Cell Companies Carrying on Business of Insurance) Regulations determine under article 15 that "where a cell exclusively carries on business of affiliated insurance or business of reinsurance and provided that it is specifically permitted by the memorandum and articles of association of the cell company, the company may, by specific written agreement to that effect, provide that only the cellular assets of that cell may be utilised to satisfy the cellular liability of such cell". This is known as non-recourse to the Core's Assets.

In February 2021 the PCC received authorisation from the MFSA for the PCC to proceed with the winding up process of the PerfectHome Cell which had stopped writing new business and renewals during 2019. The PCC is obliged to give 3 month notice to the public for the capital reduction of the PerfectHome Cell shares. This Cell had been incorporated within the PCC during 2008. Its operating functional currency is British Pound.

The OCADO Cell is ultimately wholly owned by OCADO Group plc (OCADO), a public company listed on the London Stock Exchange. OCADO is a leading online supermarket in the UK and provides home delivery of food, drink and household goods. This Cell was incorporated within the PCC during 2010 with the purpose of underwriting OCADO's insurance risk in the United Kingdom and its operating functional currency is British Pound.

The TVIS Cell is ultimately owned by TVIS Limited, an insurance intermediary authorised by the Financial Conduct Authority in the UK. The intermediary works in partnership with vets as a distribution point for pet insurance. This Cell was incorporated within the PCC during 2014 to specifically underwrite the United Kingdom book of Pet Insurance held by the intermediary and with the intention to grow the portfolio. The Cell's operating functional currency is British Pound.

The Gemini Cell is ultimately owned by Aftersales Group and was incorporated within the PCC during 2015. Aftersales Group specialises in after sale services, operating leases and insurance programmes for electronic devices such as mobile telephones, tablets, laptops and hard disk drives. The cell underwrites related theft and material damage programmes. The Gemini Cell underwrites the business via Aftersales Group BV which is an authorised intermediary regulated by the Dutch authorities and passported to a number of European member states. The Cell currently underwrites insurance risk in Belgium and other EU countries and its operating functional currency is Euro.

The L'Amie Cell is immediately owned by L'AMIE AG lifestyle insurance services, an insurance intermediary authorised by the Austrian insurance regulator. The Cell is ultimately owned by Integral Insurance Broker GmbH, which is likewise authorised in Austria. With a licence issued during 2015 and updated in 2017 the L'Amie Cell writes a handset theft and material damage portfolio in Austria and other European Countries. The Cell has been further authorised to underwrite Travel and Cyber insurance risk. The Cell's operating functional currency is Euro.

The ultimate owner of the Amplifon Cell, Amplifon SpA, is a publicly listed company on the Milan Stock Exchange and is a world leader in the distribution of hearing solutions and small hearing aids. The company is present in 21 countries. Amplifon Cell reinsures risks originating from various territories within the European Union. The insurance product is introduced by Amplifon SpA, insured by a primary multinational insurer and then reinsured with the Cell. The primary policy cover is for theft and material damage to the Insured hearing aid. The Cell's operating functional currency is Euro.

In December 2020 the MFSA authorised the PCC to incorporate a new cell, the Griffin Cell which is wholly owned by The Griffin Insurance Association Limited, a mutual insurance company seeking underwriting capabilities within the EU. The Cell has enabled the possibility to underwrite European Professional Indemnity insurance risk across EU and EEA countries through its incorporation within the PCC. The Cell's operating functional currency is Euro.

### **PCC Aggregate Cell Results**

The Cells retained similar levels of aggregated premium written.

The Cells results show an aggregate slow down on premium growth largely due to the three cells which have stopped writing new business.

The total premium written by the Cells for 2020 is reported in aggregate in the below table, highlighting the Amplifon Cell results separately which is ring fenced to the extent of not having recourse to the Core capital.

<b>Premium Written</b>	<b>Amplifon Cell</b>	<b>Other Cells</b>	<b>Aggregate</b>
	<b>Euro</b>	<b>Euro</b>	<b>Euro</b>
<b>2020</b>	-	<b>23,217,348</b>	<b>23,217,348</b>
<b>2019</b>	-	23,822,157	23,822,157
<b>Percentage Growth/-Diminution for 2018</b>	<b>0%</b>	<b>-3%</b>	<b>-3%</b>

The Amplifon Cell did not write any new reinsurance premium during 2020. The reason behind this is that, effective 1 April 2018, the Cell had stopped writing new business in line with the new business objectives of Amplifon SPA, the immediate parent. The Cell carries on its operations in servicing the existing reinsurance risk taken on by the Cell up to 31 March 2018.

The Cells' gross claims loss ratio for 2020 does not cause concern to management for any threats to the Core capital in view that all Cells have registered reasonably good net loss ratios.

This may be noted from the progression in the table reproduced below moving from gross to net claims loss ratios.

Gross Claims Loss Ratio	Amplifon		Other Cells		Aggregate	
	Euro	Euro	Euro	Euro	Euro	Euro
	2020	2019	2020	2019	2020	2019
Premium Earned	650,964	1,821,599	24,243,562	16,883,160	24,894,526	18,704,759
Claims Incurred	1,262,116	1,331,334	5,287,962	7,921,053	6,550,078	9,252,387
Gross Ratio	194%	73%	22%	47%	26%	49%
Net Claims Loss Ratio	Amplifon		Other Cells		Aggregate	
	Euro	Euro	Euro	Euro	Euro	Euro
	2020	2019	2020	2019	2020	2019
Premium Earned	650,964	1,821,599	9,718,639	9,151,477	10,369,603	10,973,076
Claims Incurred	1,262,116	1,331,334	5,287,962	5,001,124	6,550,078	6,332,458
Gross Ratio	194%	73%	54%	55%	63%	55%

### Atlas Healthcare Insurance Agency Limited (the Agency)

The Agency increased growth and profitability has continued to contribute to the Group's overall result allowing for the payment of increased dividend income.

Atlas Healthcare Insurance Agency Limited is authorised by the MFSA under the Insurance Distribution Act to act (Cap 487) as enrolled insurance agents for the Solo Undertaking. The Group retains a strong partnership with AXA PPP healthcare Limited as reinsurer for the health insurance portfolio. During the year under review the Agency sought to extend its authorisation from the MFSA to intermediate Long Term Business as agents for such business of IVALIFE Insurance Limited. Authorisation was received from the MFSA on 23 February 2021. The agency representation owns 100% equity in a Cell incorporated within Assikura Insurance Brokers PCC Limited.

The Agency's net asset value totalled €1,185,448 as on 31 December 2019 (31 December 2019 - €1,112,846), which result is in excess over regulated financial resources requirements under the Insurance Distribution Act (Cap 487).

### Eagle Star (Malta) Limited (ESL)

ESL's source of income is that of a structured remuneration in the form of a fee the handling of the run-off for Long Term business. ESL does not introduce new business to its principal, Zurich Assurance Limited.

This subsidiary manages its financial resources for the smooth running of the portfolio run-off. The net asset value of ESL is reported as on 31 December 2020 at €144,935 (31 December 2019 at €182,828).

## 1.2 System of Governance

The Atlas Group is captured for group regulatory reporting under the Solvency II regime.

As noted in the corporate structure reproduced under section 1.1 of this report Atlas Holdings Limited owns 100% of the PCC, Atlas Insurance PCC Limited, who in turn owns 100% of Atlas Healthcare Insurance Agency Limited and Eagles Star Malta Limited. Atlas Holdings Limited also owns 75% controlling interest in AISH Limited, a holding company which in turn owns 50% of Jesmond Mizzi Financial Advisors Limited. Furthermore the Parent owns 40% of the issued share capital in Assikura Insurance Brokers Limited.

The PCC is captured as an insurance undertaking under the Solvency II regime and the Solo Undertaking's Board of Directors, as appointed by Atlas Holdings in accordance with the PCC's Memorandum and Articles, is also responsible for the Group's Solvency II regulatory compliance as a whole.

The Atlas Group which is captured for group regulatory reporting under the Solvency II regime is responsible to ensure that appropriate governance procedures are set within the whole group.

The PCC's Board exercises accountability through oversight of a number of board committees who have the responsibility to oversee key functional areas of the PCC and the Group. The relevant Committees are:

- the Investment Committee;
- the Audit Committee;
- the Remuneration and Nominations Committee;
- the Risk and Compliance Committee, and
- the Information Technology Committee.

With due regard to the system of governance required by the Solvency II Directive and in considering the specific requirements of the PCC as a whole the Board also appoints the Protected Cells Committee and the Executive Committee.

Atlas believes that good risk management that is visible, repeatable and consistently applied to support decision making increases probability of success and reduces probability of failure and the uncertainty of achieving overall objectives.

The Group defines the following risk categories:

<b>Risk Category</b>	<b>Definition</b>
<b>Operational</b>	Potential losses resulting from inadequate or failed internal processes, people or systems, or from external events. Operational risk includes risks of internal and external fraud, as well as legal risks.
<b>Underwriting</b>	Risk of loss arising from the inherent uncertainties as to the occurrence, amount and timing of insurance liabilities. This is only applicable to Atlas PCC.
<b>Credit</b>	Risk of a financial loss if another party fails to perform its obligations or fails to perform them in a timely manner. Key counterparties include reinsurers, financial institutions, intermediaries, ceding companies & insureds.
<b>Market</b>	Risk that arises from fluctuations in values of, or income from, assets or interest or exchange rates. Credit risk associated with bonds is captured under this category, as is market concentration risks



	associated with equity, bonds and property. The Group considers Liquidity Risk (defined as the risk that the Group is unable to realise investments and other assets in order to settle financial obligations when they fall due) under the Market Risk category
<b>Strategic</b>	Risk of the current and prospective impact on earnings or capital arising from wrong business decisions, improper implementation of decisions, or lack of responsiveness to industry changes. The Group considers Reputational Risk (defined as the risk of a potential loss through the deterioration of the Group's reputation or standing due to a negative perception of the Group's image among policyholders, counterparties, shareholders and/or supervisory authorities) under the Strategic Risk Category

The categorisation follows best practice and current regulations.

The Group's Risk Management Policy defines the framework, strategy and guiding principles for risk management. In the implementation at the operational level, the Atlas Group adopts a three lines of defence approach, which is considered as best practice.

## 1.3 Risk Profile

Atlas Group takes and manages risks to achieve its objectives. The Board has set a risk appetite statement that broadly describes the types and amounts of risk which Atlas is willing to take in pursuit of these objectives.

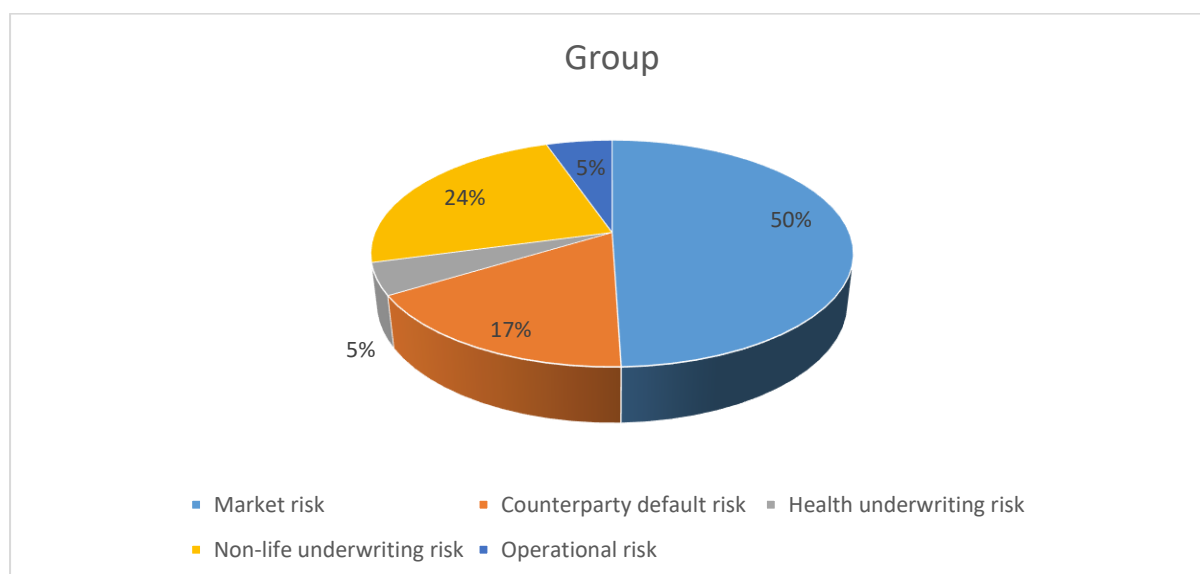
Atlas Group's objectives include achieving target performance and maximising shareholder value, preserving a level of solvency that would support the Group in challenging environments, maintaining adequate liquidity to satisfy obligations as they come due, and protecting all aspects of the Group's value, including its brand and reputation.

Underlying the Atlas Group's risk appetite are risk tolerances, high-level quantitative measures and qualitative assertions for the maximum risk allowed, set at corporate level and in line with the needs of its stakeholders. At the highest level, they are intended to maximise the likelihood of delivering on the Group's vision, mission, and values.

As is obligatory under the Solvency II regime the Group reserves equity so as to ensure that risk scenarios at a minimum confidence level will be sufficiently matched with appropriate assets matched to its existing and contingent liabilities. In so doing the PCC's Board has opted to adopt the standard formula for the PCC and the Group which is driven by European Union (EU) regulation as being the model in calculating the regulated equity required for the matching of its solvency positions.

Regulation requires all Cells to determine their individual notional Solvency Capital Requirement (nSCR) under "ring fenced funds" Solvency II rules. The PCC's Core Capital surplus over its own nSCR may also be utilised to cover any shortfall in each Cell's equity in matching their own individual nSCR with the exception of the Amplifon Cell, which Cell too reserves equity to match its own nSCR. As such the Group's Own Funds are also depleted by any shortfall that a Cell may have in matching its own nSCR.

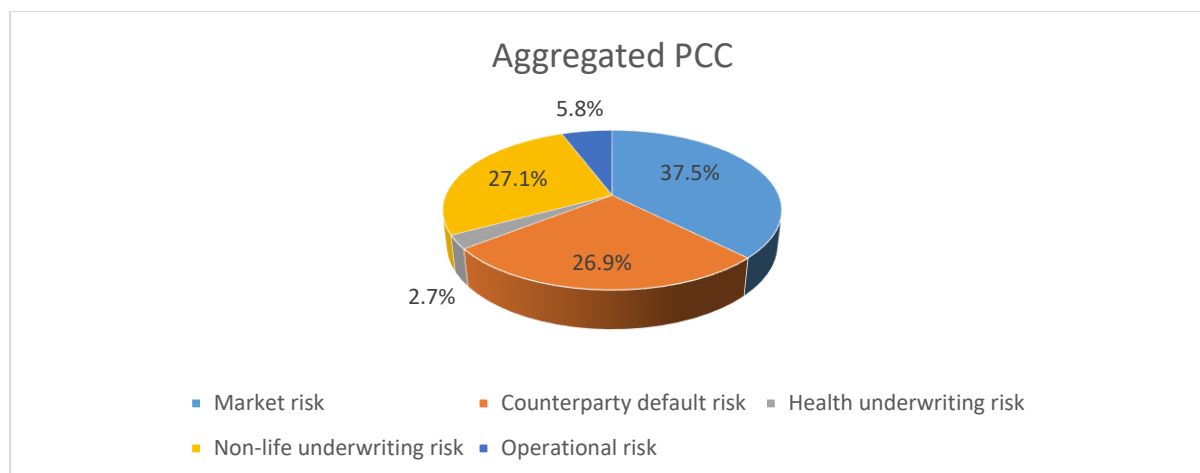
The Atlas Group's risk profile is simply reproduced and expressed in percentages of that calculated as on end 2020 solvency capital requirement (SCR) of €13,421,592 as follows:



As part of the Atlas Group's regulated Own Risk and Solvency Assessment (ORSA) the Group carries out a number of stress tests on various risk scenarios, while also comparing these results with those

produced under the standard formula. This reporting procedure to the Board of Directors is carried out by the Chief Risk and Compliance Officer of the Group.

Same as for the Group above, the PCC's aggregated risk profile inclusive of Cells is also being reproduced as calculated at year end 2020 and the solvency capital requirement (SCR) of €22,153,653 is split between risk components as follows:



Solvency II regulation requires that the Group is to match its SCR with an equal amount or more of Own Funds (Equity). It also defines Equity in three tiers, with Tier 1 ranking to its full capacity and Tiers 2 and 3 in aggregate allowed to apply for up to 50% of the nSCR. The Atlas Group matches its SCR with 100% Tier 1 Own Funds which total €37,104,276 as on 31 December 2020 (2019: €36,263,378).

Furthermore Solvency II regulations require a Group to ensure that it matches appropriate own funds to the Minimum Consolidated Group Solvency Capital Requirement at all times and may not fall below a 100% ratio of this threshold.

The Minimum Consolidated Group Solvency Capital Requirement is the result of the Solo's Minimum Capital Requirement (MCR) calculation for its Core. The regulations apply the principle of an Absolute Minimum Capital Requirement (AMCR) which is currently set at €3,700,000. The Group would be required to hold sufficient own funds in excess of the Core's MCR or AMCR whichever is the highest. As such the Group's MCR for 2020 is being reported at €3,700,000.

As may be seen under section 1.4 below, the Atlas Group's substantial own funds do not fall short of this requirement and notes material surplus capital over its SCR.

As part of the Atlas Group's regulated Own Risk and Solvency Assessment (ORSA) the Group carries out a number of stress tests on various risk scenarios, while also comparing these results with those produced under the standard formula. This reporting procedure to the PCC's Board of Directors is carried out by the Chief Risk and Compliance Officer of the Group.

## 1.4 Valuation of Assets and Liabilities

The preparation of the Atlas Group's financial statements is carried out in conformity with IFRSs as adopted by the EU and this requires the use of critical accounting estimates.

It requires the directors to exercise their judgement in the process of applying the Group's accounting policies. A higher degree of judgement for the complexity of the management of insurance and financial risk is also required where these areas of assumptions and estimates are significant to the consolidated financial statements.

### **Insurance risk**

The Atlas Group is exposed to insurance risk through the PCC's operations. The PCC recognises liabilities arising from its operations, and specifically identifies those arising from premium written and claims incurred, while also establishing recoverability from reinsurers.

The PCC uses various techniques in estimating liabilities arising from claims. A component of these estimation techniques is usually the estimation of the cost of notified but not paid claims. Large claims impacting each relevant business class are generally assessed separately, being measured on a case by case basis or projected separately in order to allow for the possible distortive effect of the development and incidence of these large claims.

The estimation of claims incurred but not reported (IBNR) is generally subject to a greater degree of uncertainty than the estimation of the cost of settling claims already notified to the PCC where more information about the claim event is generally available. Claims IBNR may often not be apparent to the insured until several years after the event. In calculating the estimate cost of unpaid claims, the PCC uses statistical analyses of historical experience in order to identify the IBNR component to be added to its known claims reserves.

Unearned premium reserves are formulated on a 365<sup>th</sup> time apportionment basis of calculation. This method of calculation proves to be most accurate in identifying arising liabilities at the time of Balance Sheet reporting. These liabilities are reflective of that amount of premium remaining unearned on an individual policy basis, aggregated to determine the PCC's total liability at any point in time.

Provision is also made for any deficiencies arising when unearned premiums, net of associated acquisition costs, are insufficient to meet expected claims and expenses after taking into account future investment return on the investments supporting the unearned premiums provision and unexpired risks provision. The expected claims are calculated having regard to events that have occurred prior to the balance sheet date.

### **Financial Risk**

The Atlas Group is exposed to financial risk through its financial assets and liabilities, reinsurance assets and insurance liabilities. The key financial risk is that the proceeds from its financial assets would not be sufficient to fund the obligations arising from its insurance contracts and investing activity. The most important components of the Group's financial risk are market risk (cash flow and fair value interest rate risk, equity risk, spread risk, concentration risk and currency risk), credit risk and liquidity risk. These risks mainly arise on open positions in interest rate, debt and equity products, and currency exposures, which are all subject to market movements.

The Group holds investments mostly in equity and debt securities, but also includes, for its investment strategy some properties held for rental income. Debt securities are subject to spread risk, interest rate risk and concentration risk. Equities are subject to equity risk and concentration risk. Foreign

denominated equity and debt securities are also subject to currency risk. As such both types of securities are fair valued for reporting the balance sheet in accordance with IFRS.

### **Solvency II values**

Solvency II regulation requires that differing criteria are applied to the valuation of Assets and Liabilities representing the Group's Equity in the Balance Sheet causing deviation from those represented under accounting principles.

The value of assets represented in the Solvency II balance sheet totalling €86 million differ from the total of the assets as represented under IFRS for the Group of €94 million (the Solo Undertaking – €107 million for Solvency II, IFRS - €138 million). The differences between the Solvency II values and those of IFRS arise due to different criteria of valuation for deferred acquisition costs, deferred taxation and reinsurance recoverables.

The Technical Provisions have been calculated as the sum of a best estimate plus a risk margin in accordance with the Commission Delegated Regulation (EU) 2015/35. The best estimate is calculated separately for the premium provision and for the claims provision. The claims provision is the discounted best estimate of cash flows relating to past claim events that occurred before the valuation date, whether reported or not. The cash flows include: future cash flows resulting from past claims events (including salvage and subrogation) and cash flows arising from allocated and unallocated expenses in respect of past claims events. The premium provision relates to future claims events covered by obligations falling within the contract boundary. Cash flow projections for the calculation of the premium provision includes benefits, expenses and premiums relating to these events. The methodology used to determine the best estimate and risk margin for technical provisions may be found under Section 5.3. This different approach results in the value of liabilities represented in the Solvency II balance sheet totalling €47 million having reduced from the total of the liabilities as represented under IFRS of €54 million (the Solo Undertaking – €52 million for Solvency II, IFRS - €84 million).

In arriving at the best estimate for technical provisions no transitional arrangements allowed under Solvency II regulation have been used by the actuaries.

### **COVID-19 Pandemic**

During the foreseeable future the Group's investment asset portfolio may still be significantly impacted as a result of global recession due to COVID-19. In April 2020, the Board of Directors stressed the PCC's cash flow projections, and other financial indicators such as asset values for the COVID-19 Pandemic. The results arising from the relevant shocks applied in their aggregate did negatively impact the expected results arising from the original 2020 budget. These results had been reported on in last year's annual report and in both the Group's and the PCC's Solvency and Financial Condition Report. The directors were satisfied that the strength of the Group's Balance Sheet and diversified revenue streams would allow the Group to sustain the extreme losses contemplated in the stress exercise.

By mid-year the PCC had reviewed actual performance and investment market trends and revised its outlook to a more positive one.

Atlas Group recognises the importance of optimising the balance between return and risk, whilst maintaining economic and regulatory capital in accordance with the risk appetite.

The Group adheres to a Capital Management Policy approved by the PCC's Board which includes procedures to ensure that the own funds items satisfy at issue the prescribed profiling of Solvency II regulated tiering under Article 93 of Directive 2009/13/EC of capital on an ongoing basis. Such Policy includes controls on issuance of new capital instruments and sets out the approach to managing dividends and distribution.

As on 31 December 2020 the Atlas Group's eligible own funds in matching the Group's SCR stood at a Solvency ratio of 295% of the required margin and this positioning is perfectly reflective of the prudence applied by the Atlas Group in ensuring sufficient reserves under own funds which totaled €39.4 million. This position also factors in any Cells' shortfall in matching their individual SCR within the PCC.

The PCC's Board are ultimately responsible for the establishment of such procedures and controls in order to provide reasonable assurance that the Atlas Group is adequately capitalised in the interest of all stakeholders. Adequate reporting by the Executive to the Board is routinely carried out.

The PCC's Board of Directors has also developed a Group wide medium-term capital management plan. This control is largely reflected in the Group's ORSA which factors in future year projections for both the Group and the Cells incorporated within the PCC. The ORSA approved by the Solo Undertaking's board carries forecasts that the Group will carry on to register high solvency margin ratios in excess of those required for the medium term.

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## Assessment of the Loss Absorbing Capacity of Deferred Tax (LACDT) adjustment

New requirements around the LACDT adjustment took effect from 1 January 2020, although these were already considered by the Atlas Group as at YE2019 assessment of capital requirements. These new requirements include the need to consider the impact that the current notional loss would have on future pricing, profitability and uncertainty.

Following scenario tests to determine profit recoverability following various severe scenarios, the extent that can be recovered from deferred tax assets from separate 1 in 200 year losses in insurance, market or counterparty risk (i.e. from the respective capital charges) is estimated. This is applied to both solvency and economic capital requirements.

The Group's assessment for the allowance of LACDT recoverability is being limited for insurance risk (non-life U/W and health U/W) charge to 20%, resulting in a 7% tax charge. Additionally, the LACDT recoverability has also been limited for the other risk categories to 80%, implying a 28% tax charge:

	Group
Market Risk	28%
Counterparty Risk	28%
Non-Life Insurance Risk	7%
Health NSLT	7%
Operational	28%

Over and above the recoverability limitation applied above, another layer of prudence is applied by limiting the future profitability over the 3-year business planning period under a stressed scenario. In this case, the amount that could be recovered is limited to the tax payable on 50% of future base profits in year 1 and 75% of future base profits in year 2. The recoverability period is also limited to 3 future years, in line with the business planning period.

The minimum resulting LACDT adjustment between the two methods is chosen.

The amount of LACDT adjustment allowed for in the assessment of the regulatory SCR for the 2020 valuation year is detailed below:

<b>2020</b>			
<b>Loss Absorbing Capacity of Technical Provision and Deferred Tax</b>	<b>-€4,217,754</b>		
<b>Losses predicted by SCR Model which can be recovered from future profits</b>	<b>-€4,217,754</b>	<b>Risk Charge</b>	<b>Applicable tax rate</b>
Market Risk	-€3,253,106	€11,618,237	28%
Counterparty Risk	-€1,101,572	€3,934,185	28%
Non-Life Insurance Risk	-€393,145	€5,616,358	7%
Health NSLT	-€74,249	€1,060,705	7%
Diversification (Market, Counterparty, Insurance)	€951,386		
Operational Risk	-€347,067	€1,239,527	28%
<b>LACDT Cappings:</b>			
35% x (BSCR+Op)	-€6,173,771		
35% x 3 Year Proj Profits Before Tax Net of Inv Income / 3 x 3 (3 yr)	-€5,906,948		
35% x 3 Year Proj Profits Before Tax Net of Inv Income - limited profitability: 50% yr 1, 75% yr 2, 100% yr 3	-€4,496,937		

As part of its annual Own Risk and Solvency Assessment (ORSA) exercise, the Group continues to test resilience of its capital adequacy under various stress scenarios. Any further potential impact of COVID-19 on own funds is likely to continue to be on the asset side as a result of the impact on investment assets. On the other hand, the impact on the SCR is not likely to be significant, as previous calculations of the SCR for stressed projections have shown offsetting results for reduced business volumes and reduced asset exposures.



## 2. Business and Performance

### 2.1 Corporate form, Regulatory Supervision and Beneficial Owners

**Atlas Holdings Limited** is a limited liability Company incorporated in Malta (Company Registration no. C 23431) with registered office at 48-50, Ta'Xbiex Seafront, Ta'Xbiex, Malta. The Company is considered by the Solvency II Directive as being an "insurance holding company" as defined by Title III, Section 1, Article 212 1.f. of the Directive.

#### Supervision of the Group

As such the MFSA is the national regulator responsible for the Group Supervision of the Atlas Group. The MFSA offices are located at Notabile Road, Mriehel, Malta having its registered site website [www.mfsa.com.mt](http://www.mfsa.com.mt).

Under Group Supervision Regulation the Group is required to report on the consolidated results for the Atlas Group and for the authorised undertaking, **Atlas Insurance PCC Limited** and the PCC's **Cells**.

As highlighted under the Executive Summary of this report, the Cell's results are discarded for the reporting of the Group's consolidated results. The Cells are then also reported on separately.

#### External Auditors

The external auditors for the Atlas Group are PricewaterhouseCoopers (PWC) whose registered address is 78, Mills Street, Qormi, Malta and having their registered website [www.pwc.com/mt/en](http://www.pwc.com/mt/en). PWC have issued unqualified audit reports for the Atlas Group, and its subsidiaries, financial statements.

#### Shareholders and qualifying ultimate beneficial owners holding more than 10% holding of the Atlas Group

The Group is immediately owned by:

- Walter Camilleri Management Limited – 19.05%
- Catherine Calleja – 0.80%
- Albert Formosa – 19.85%
- John Formosa – 14.33%
- Brockland Holdings Limited – 26.97%
- Arva Holdings Limited – 8.00%
- Palico Holdings Limited – 0.15%
- Safaco Limited – 1.30%
- Earli Limited – 1.30%
- SIGA Limited – 5.50%
- Alf Mizzi & Sons Limited – 2.75%

Individuals holding shares amounting to more than 10% of the total issued shares as qualifying owners of Atlas Holdings Limited are:

- Mr Matthew von Brockdorff – 15.48% as shareholder of Brockland Holdings Limited

- Mrs Michelle Lundquist – 11.49% as shareholder of Brockland Holdings Limited
- Mr Robert and Mrs Elizabeth von Brockdorff – 26.97% in virtue of their controlling interest in Brockland Holdings Limited
- Mr Walter and Mrs Patricia Camilleri – 19.05% in virtue of their controlling interest in Walter Camilleri Management Limited
- Mr Albert Formosa – 19.85%
- Mr John Formosa – 14.33%

## 2.2 Business

### 2.2.1 Review of the Business

Atlas Group reports for its controlling interests in its subsidiaries and for its associate companies a consolidated profit before tax for the financial year ended 31 December 2020 of €7,064,403 (2019: €9,267,887).

The Group's profitability has been particularly influenced by the Solo Undertakings results for the year with positive technical results for its insurance operations and a marginal return on investments which had been impacted by the Pandemic in the earlier part of 2020.

When the outbreak of Covid-19 hit hard the stock markets at the end of March, it caused a drop of 9% on the Atlas Group's investment portfolio values from those of January 2020. The Group ended the year with a marked recovery to a marginal 1% negative return on investments by year end. Covid-19 did have a negative impact on the PCC's Core Travel and Commercial Insurance business. The overall financial performance was however favourably impacted by a good Core technical result driven by a highly motivated team of people many of whom went beyond the call of duty.

The PCC's Board of Directors continues to be vigilant about the recent developments of the pandemic and the negative impact this is having on the local and global economies. It is committed to managing the Group's positions during 2021 as it has during 2020.

All operations within the Group performed well during the year under review. The Solo Undertaking's robust technical results, the Agency's stable profit and the recognition of Associate Companies' results combine well in registering consolidated profitability for the Group. This is considered by the board of directors to be yet another good year working toward strengthening the Atlas Group's Balance Sheet and reserves.

The Group Companies' profit before taxation is summarised in the below table as follows:

<b>Profit before Taxation</b>	<b>2020</b>	<b>2019</b>
	<b>€</b>	<b>€</b>
Atlas Holdings Limited	<b>1,886,073</b>	2,224,957
Atlas Insurance PCC Limited - Core	<b>7,080,257</b>	9,674,992
Atlas Healthcare Insurance Agency Limited	<b>689,436</b>	830,123
AISH Limited	<b>276,940</b>	93,713
Share in Associate Companies' Results	<b>122,624</b>	234,552
Atlas Insurance PCC Limited - Aggregated Cells	<b>482,734</b>	688,107

The PCC continues to grow its premium income through its Core operation with premium written for the Core being reported at €42,077,465, an increase of 4% over the previous year which had been reported at €40,573,438. The result for the aggregate PCC premium written is reported for 2020 at €65,294,813 (2019: €64,395,595).

The aggregate Cellular premium written slowed down for growth in fact registering a marginal reduction on the prior year 2019. As reported earlier the PerfectHome Cell is in the process of being wound up whereas two other Cells are currently addressing their business plan for the way forward in 2022. These three cells in fact have not written any premium for 2020.

The aggregated Cells' premium underwritten by the PCC marginally decreased from €23,822,157 in 2019 to €23,217,348 in 2020.

The PCC continues to entertain interest from prospective cell shareholders and is expected to grow its Cells network to nine cells by year end. The PCC's executive has also positively addressed any threat to the PCC's continued operation that the now concluded exit of the UK from the EU may cause for its existing and new cellular operations in the United Kingdom. The PCC is intended to start its application process to the PRA for the authorisation of operating a branch in the UK during the second quarter 2021. The PCC is currently operating till the end of 2023 under the UK's Temporary Permission's regime. The branch would be regulated by the UK's FCA.

The Agency also saw its premium written grow for the year under review by 5% from €11,998,911 for 2019 to €12,562,808 for the year ended 31 December 2020. This increase in premium results in increased agency commission earned for the year under review.

## 2.2.2 Atlas Group Income Statement

The below statement, an extract from the Group's audited accounts, summarises the results for the Group after taxation and reports a consolidated profit of €4,812,514 accruing to the Atlas Holdings Limited shareholders for the year ended 31 December 2020.

### Group Consolidated Income statements

	2020 €	2019 €
Balance on the general business of insurance technical account	9,428,061	8,626,487
Revenue from non-insurance operations	389,460	451,684
Direct expenses	(431,014)	(412,653)
<b>Gross profit</b>	<b>9,386,507</b>	<b>8,665,518</b>
Other income		
Administrative expenses	(1,777,168)	(1,642,518)
<b>Operating profit</b>	<b>7,609,339</b>	<b>7,023,000</b>
Investment income/(expense)	(649,694)	2,024,933
Net interest expense	(17,867)	(14,598)
Share of results of associates	122,624	234,552
<b>Profit before tax</b>	<b>7,064,403</b>	<b>9,267,887</b>
Tax expense	(2,208,051)	(3,133,191)
<b>Profit for the year</b>	<b>4,856,352</b>	<b>6,134,696</b>
<b>Attributable to:</b>		
Owners of the Company	4,812,514	6,098,875
Non-controlling interests	43,838	35,821
	<b>4,856,352</b>	<b>6,134,696</b>

The Atlas Group underwrites insurance risk through its protected cell company, Atlas Insurance PCC Limited. As such the Group is also required to report on the Solo Undertaking and its incorporated Cells and in the below extract from the financial statements the Group is reproducing the PCC's aggregated results for the year ended 31 December 2020. Furthermore the Group is also required to report on the technical results of the PCC for its Core and Cells separately.

The PCC reports an aggregated profit before tax for the financial year ended 31 December 2020 of €7,562,991 (2019: €10,363,099).

The PCC continues to report sustained profitability in both its Core and individual cellular operations.

The PCC's aggregate profit before taxation is summarised in the below table as follows:

	Core		Cells		Total	
	2020 €	2019 €	2020 €	2019 €	2020 €	2019 €
<b>Balance on technical account – general business (page 22)</b>	<b>6,898,959</b>	<b>7,155,139</b>	<b>552,079</b>	<b>749,664</b>	<b>7,451,038</b>	<b>7,904,803</b>
Investment income	911,905	5,434,477	35,312	40,933	947,217	5,475,410
Investment expenses and charges	(319,872)	(239,217)	(35,533)	(4,167)	(355,405)	(243,384)
Allocated investment return transferred to the general business technical account	(280,745)	(2,449,337)	(2,814)	(19,731)	(283,559)	(2,469,068)
Administrative expenses	(129,990)	(226,070)	(66,310)	(78,592)	(196,300)	(304,662)
<b>Profit before tax</b>	<b>7,080,257</b>	<b>9,674,992</b>	<b>482,734</b>	<b>688,107</b>	<b>7,562,991</b>	<b>10,363,099</b>
Tax expense	(2,257,320)	(3,094,279)	(583,806)	(403,828)	(2,841,126)	(3,498,107)
<b>Profit for the year</b>	<b>4,822,937</b>	<b>6,580,713</b>	<b>(101,072)</b>	<b>284,279</b>	<b>4,721,865</b>	<b>6,864,992</b>

The Core has registered continued good profits for the year. The pure technical result achieved, resulting from the prudent underwriting measures adopted by the PCC is augmented by a marginal investment return result.

The Motor and Health classes continue to produce positive technical results for the year under review which combine well with good results in other classes. This resulted in a combined loss ratio of 83% (2019: 80%) across the Core's full portfolio.

The PCC's pool of Cells have also performed well. The aggregate results for the cells do report a reduction in aggregate profit due to varying circumstances of interrupted income. The PerfectHome Cell has, after having stopped underwriting insurance risk as from April 2019, has given notice to the MFSA that it is intended to wind up its incorporation within the PCC. The Cell received authorisation to proceed in February 2021 and is currently in process of winding up. As reported earlier the Griffin Cell was authorised and incorporated in December 2020, and has started writing business in January 2021.

The Amplifon Cell registers a combined loss ratio of 215% (2019: 89%). The Amplifon Cell continues to run-off reinsurance business risk which extends up to early 2022. The run-off positioning for the Cell is supported by its capital base which, notwithstanding the depletion in own funds for losses reported during 2020, is robust enough to match its regulated requirements for solvency capital.

Other Cells also performed well registering an aggregate combined loss ratio of 105% (2019: 97%) which result is impacted by one specific cell which is currently running off its claims reserves.

The PCC continues to grow its premium income through its Core operation with premium written for the Core being reported at €42,077,465, an increase of 4% over the previous year which had been

reported at €40,573,438. The result for the aggregate PCC premium written is reported for 2019 at €65,294,813 (2019: €64,395,595).

The aggregate Cellular premium written slowed down for growth in fact registering a marginal reduction on the prior year 2019. As reported earlier the PerfectHome Cell is in the process of being wound up whereas two other Cells are currently addressing their business plan for the way forward in 2022. These three cells in fact have not written any premium for 2020.

The aggregated Cells' premium underwritten by the PCC marginally decreased from €23,822,157 in 2019 to €23,217,348 in 2020.

The PCC continues to entertain interest from prospective cell shareholders and is expected to grow its Cells network to nine cells by year end. The PCC's executive has also positively addressed any threat to the Solo Undertaking's continued operation that the now concluded exit of the UK from the EU may cause for its existing and new cellular operations in the United Kingdom. The PCC is intended to start its application process to the PRA for the authorisation of operating a branch in the UK during the second quarter 2021. The PCC is currently operating till the end of 2023 under the UK's Temporary Permission's regime. The branch would be regulated by the UK's FCA.

The following two tables illustrate summarily the technical results for the PCC for both insurance and reinsurance operations.

Atlas Insurance PCC Limited - PCC Aggregate in Euro '000						
	Premium Written			Net Premium Earned	Net Claims Incurred	Net Claims Loss Ratio before other costs
	Gross	Reinsurer	Net			
Medical Expense Insurance	12,561,421	9,678,372	2,883,049	2,818,425	1,898,783	0.00%
Income Protection Insurance	600,265	5,363	594,903	588,930	34,444	5.85%
Motor Vehicle Liability Insurance	6,072,344	563,738	5,508,607	5,906,567	3,533,899	59.83%
Other Motor Insurance	6,971,108	-	6,971,108	6,326,263	2,221,984	35.12%
Marine, Aviation and Transport Insurance	1,459,305	852,981	606,324	599,973	225,324	37.56%
Fire and Other Damage to property Insurance	32,934,288	22,552,122	10,382,166	11,352,863	6,860,883	60.43%
General Liability Insurance	3,361,219	589,264	2,771,955	2,634,514	256,712	-9.74%
Miscellaneous Financial Loss Insurance	1,334,862	1,210,393	124,469	37,414	200,599	536.16%
<b>Total</b>	<b>65,294,813</b>	<b>35,452,233</b>	<b>29,842,580</b>	<b>30,264,950</b>	<b>14,719,204</b>	<b>48.63%</b>

Atlas Insurance PCC Limited - Core in Euro '000						
	Premium Written			Net Premium Earned	Net Claims Incurred	Net Claims Loss Ratio before other costs
	Gross	Reinsurer	Net			
Medical Expense Insurance	12,561,421	9,678,372	2,883,049	2,818,425	1,898,783	0.00%
Income Protection Insurance	600,265	5,363	594,903	588,930	34,444	5.85%
Motor Vehicle Liability Insurance	6,072,344	563,738	5,508,607	5,906,567	3,162,177	53.54%
Other Motor Insurance	6,971,108	-	6,971,108	6,326,263	2,221,984	35.12%
Marine, Aviation and Transport Insurance	1,459,305	852,981	606,324	599,973	225,324	37.56%
Fire and Other Damage to property Insurance	10,214,183	9,209,338	1,004,846	1,000,237	685,721	68.56%
General Liability Insurance	3,361,219	589,264	2,771,955	2,634,514	256,712	-9.74%
Miscellaneous Financial Loss Insurance	837,619	818,133	19,486	20,437	197,405	965.92%
<b>Total</b>	<b>42,077,465</b>	<b>21,717,188</b>	<b>20,360,277</b>	<b>19,895,347</b>	<b>8,169,126</b>	<b>41.06%</b>

At year end 2020 the PCC's Core registered an overall net claims loss ratio before other expenses of 41%, whereas the PCC registered an aggregated claims loss ratio before other expenses of 49%.

Solvency II rules require that quantitative information is reported under prescribed templates. Below, the Group is reproducing the Quantitative Reporting Templates (QRT) as required under regulation for the Group and the PCC's Aggregate.

**QRT Table 1 – Atlas Group in Euro ‘000**

**G.05.01.02**

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

		Line of Business for: <b>non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)</b>								Total
		Medical expense insurance	Income protection insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Miscellaneous financial loss	
		C0010	C0020	C0040	C0050	C0060	C0070	C0080	C0120	
Premiums written										
Gross - Direct Business	R0110	12,561	600	6,072	6,971	1,459	10,214	3,361	838	42,077
Gross - Proportional reinsurance accepted	R0120									
Gross - Non-proportional reinsurance accepted	R0130									
Reinsurers' share	R0140	9,678	5	564		852	9,158	589	870	21,717
Net	R0200	2,883	595	5,509	6,971	607	1,056	2,772	-32	20,360
Premiums earned										
Gross - Direct Business	R0210	12,327	594	6,509	6,326	1,452	10,013	3,237	859	41,318
Gross - Proportional reinsurance accepted	R0220									
Gross - Non-proportional reinsurance accepted	R0230									
Reinsurers' share	R0240	9,509	5	602		852	8,955	603	897	21,422
Net	R0300	2,818	589	5,907	6,326	601	1,058	2,635	-38	19,895
Claims incurred										
Gross - Direct Business	R0310	7,046	35	3,351	2,105	522	6,447	-253	3,210	22,465
Gross - Proportional reinsurance accepted	R0320									
Gross - Non-proportional reinsurance accepted	R0330									
Reinsurers' share	R0340	5,458		15		284	5,580	20	2,939	14,295
Net	R0400	1,588	35	3,336	2,105	238	868	-273	271	8,169
Expenses incurred	R0550	854	41	413	474	99	694	228	57	2,860
Other expenses	R1200									
Total expenses	R1300									2,860

**QRT Table 2 – PCC Aggregated Core and Cells in Euro '000**

S.05.01.02

Premiums, claims and expenses by line of business

		Line of Business for: <b>non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)</b>									Total
		Medical expense insurance	Income protection insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Assistance	Miscellaneous financial loss	
		<b>C0010</b>	<b>C0020</b>	<b>C0040</b>	<b>C0050</b>	<b>C0060</b>	<b>C0070</b>	<b>C0080</b>	<b>C0110</b>	<b>C0120</b>	<b>C0200</b>
<b>Premiums written</b>											
Gross - Direct Business	<b>R0110</b>	12,570	600	6,072	6,971	1,459	31,139	3,409	4	1,335	63,560
Gross - Proportional reinsurance accepted	<b>R0120</b>						1,734				1,734
Reinsurers' share	<b>R0140</b>	9,686	5	564		852	22,403	592	4	1,346	35,452
Net	<b>R0200</b>	2,884	595	5,509	6,971	607	10,470	2,817	0	-11	29,843
<b>Premiums earned</b>											
Gross - Direct Business	<b>R0210</b>	12,335	594	6,509	6,326	1,452	32,144	3,285	4	1,268	63,919
Gross - Proportional reinsurance accepted	<b>R0220</b>						2,293				2,293
Reinsurers' share	<b>R0240</b>	9,516	5	602		852	23,073	606	4	1,289	35,947
Net	<b>R0300</b>	2,819	589	5,907	6,326	601	11,364	2,679	0	-21	30,265
<b>Claims incurred</b>											
Gross - Direct Business	<b>R0310</b>	7,046	33	3,528	2,057	489	17,447	-242	0	3,009	33,367
Gross - Proportional reinsurance accepted	<b>R0320</b>						1,707				1,707
Reinsurers' share	<b>R0340</b>	5,458	0	100	16	284	11,533	20	0	2,944	20,355
Net	<b>R0400</b>	1,588	33	3,428	2,042	205	7,621	-262	0	64	14,719
<b>Expenses incurred</b>	<b>R0550</b>	1,991	95	962	1,105	231	4,573	533	0	102	9,592
<b>Other expenses</b>	<b>R1200</b>										-1,497
<b>Total expenses</b>	<b>R1300</b>										8,095



**QRT Table 3 – PCC Aggregated Core and Cells in Euro '000**

**Top 5 Countries other than Malta**

S.05.02.01

Premiums, claims and expenses by country

		Home Country	Top 5 countries (by amount of gross premiums written) - non-life obligations					Total Top 5 and home country
		C0010	C0020	C0030	C0040	C0050	C0060	C0070
	R0010		FR	CH	MT	FI	NL	
		C0080	C0090	C0100	C0110	C0120	C0130	C0140
<b>Premiums written</b>								
Gross - Direct Business	R0110	42,077			0	0	52	42,130
Reinsurers' share	R0140	21,717						21,717
Net	R0200	20,360			0	0	52	20,413
<b>Premiums earned</b>								
Gross - Direct Business	R0210	41,318			0	0	54	41,372
Gross - Proportional reinsurance accepted	R0220		130	79			370	579
Reinsurers' share	R0240	21,422						21,422
Net	R0300	19,895	130	79	0	0	423	20,529
<b>Claims incurred</b>								
Gross - Direct Business	R0310	22,465					3	22,467
Gross - Proportional reinsurance accepted	R0320		145	-31			1,410	1,524
Reinsurers' share	R0340	14,295						14,295
Net	R0400	8,169	145	-31			1,413	9,696
<b>Expenses incurred</b>	R0550	6,668	8	3	0	0	38	6,718
<b>Other expenses</b>	R1200							
<b>Total expenses</b>	R1300							6,718

## 2.3 Investment Performance

The Group reports on the results for investment return of the Atlas Group, and that of the PCC Core.

The Atlas Group reports a total investment loss inclusive of investment expenses for the year ended 31 December 2020 of €368,949 (2019 – Income €4,474,270).

The PCC Core registered total investment income net of investment expenses for the year ended 31 December 2020 of €592,033 (2019: €5,195,260). During 2019 the Core had reported important results for investment return, benefiting from the material increases in the fair value of investment securities held. The global economic crisis that emerged in spring 2020 due to the pandemic had its effect on the same gains registered during 2019 by causing a diminution of 9% in fair value on the securities held by end March 2020.

Notwithstanding this downturn registered at the end of the first quarter 2020 the prudent structuring of the PCC's investment portfolio assisted in the recovery by year end. As such the Board of Directors continues to apply an investment policy which allows for reasonable return on investment while safeguarding through prudence appropriate spread in its allocation, and largely placing investments in high grade securities.

The Atlas Group consolidated results differ from those of the PCC Core due to two Group Accounting rules. These are:

- The write back of the PCC's dividend income arising from subsidiary companies upon consolidation within the Atlas Group;
- The inclusion of Associate Company results in the Group's reporting.

A summary of the investment portfolio performance is included in the below table.

<b>Atlas Group</b>	<b>Group</b>		<b>PCC Core</b>	
<b>Investment Performance in Euro</b>	<b>2020</b>	<b>2019</b>	<b>2020</b>	<b>2019</b>
Interest receivable from financial assets that are not held at fair value through profit or loss	<b>14,240</b>	32,498	<b>40,182.00</b>	34,781
Net gains from financial assets held at fair value through profit or loss				
- dividend income	<b>123,574</b>	214,636	<b>243,985</b>	724,106
- net fair value gains	<b>(728,607)</b>	3,333,471	<b>(858,109)</b>	2,803,309
Dividend from subsidiary undertaking			<b>953,846</b>	725,000
Fair value gains on investment property	-	519,050	<b>0</b>	519,050
Gain on disposal of investment property	-	264,532	<b>0</b>	264,532
Exchange differences	-	-	<b>1,435</b>	54,020
Rental income from investment property	<b>541,716</b>	349,300	<b>541,716</b>	349,300
Investment expenses	<b>(319,872)</b>	(239,217)	<b>(331,243)</b>	(242,072)
<b>Total</b>	<b>(368,949)</b>	4,474,270	<b>591,812</b>	5,232,026
<b>Percentage Return as on 31 December</b>	<b>-0.82%</b>	9.88%	<b>1.30%</b>	11.36%

<b>Atlas Group</b>	<b>Group</b>		<b>PCC Core</b>	
<b>Investment Portfolio held in Euro</b>	<b>2020</b>	<b>2019</b>	<b>2020</b>	<b>2019</b>
- land and buildings	<b>10,499,167</b>	11,220,883	<b>10,499,166</b>	11,220,883
- investment in subsidiaries	-	-	<b>748,058</b>	748,058
- other financial investments	<b>34,430,290</b>	34,073,942	<b>34,430,290</b>	34,073,942
<b>Total</b>	<b>44,929,457</b>	45,294,825	<b>45,677,514</b>	46,042,883

The PCC's Board of Directors' prudence in its investment strategy for protecting the stakeholders' interest which is applied across the Group was key in overcoming potential major losses during the year. The principle of prudence applied here is elaborated on under sections 3 and 4 of this report.

## 2.4 Performance of other activities

The Group reports other income totalling €389,460 for the year ended 31 December 2020 (2019: €451,684). The additional revenue reported is distinct from its Solo Undertaking technical results and as such is reported from its various subsidiaries on consolidation. The below table defines the components making up such results.

Other Income in Euro	Atlas Group	
	2020	2019
Commissions	346,248	363,628
Survey and other Fees	43,212	88,056
<b>Total</b>	<b>389,460</b>	<b>451,684</b>

The Group receives commissions for its subsidiary run off of a long term business portfolio.

The PCC Core receives Cell facility, insurance management and oversight fees for the hosting and management of the Cells, while also recognising income derived from its expert surveying resources. These are classified as Survey and Other Fees for the purpose of the above table.

## 3. System of Governance

### 3.1 General Information on the system of governance

As noted in the executive summary the Group is captured for group regulatory reporting under the Solvency II regime. As is required under Solvency II for the Atlas Group's regulatory requirements under group supervision rules the Solo Undertaking's Board of Directors is entrusted to oversee the Group's compliance with all three Pillars under the Solvency II regime besides that of the PCC. As such it is also responsible to ensure that appropriate governance procedures are set within the whole group.

The Group's system of governance is best reported on by addressing the whole structure and organisation put in place for the Group as a whole. Such system of governance addresses all companies within the Atlas Group but also extending to all cells included in the PCC.

The following is a brief outline of how the Atlas Group proceeds in addressing its system of governance by applying appropriate corporate procedures in achieving its business objectives. It is the responsibility of the PCC's Board of Directors to oversee that a system of good corporate governance is in place and complied with throughout the whole Group.

#### **Relations with Policy Holders**

Atlas Group adheres to all regulated requirements as regards the policyholder and the public in general. The Group welcomes all enquiries on this report after having assessed the relevance and appropriateness of such enquiries. Senior management, including executive board members, make themselves available to any reasonable scrutiny by the policy holder and the public. At all times such communication of information is carried responsibly by the management of the Group so as to ensure appropriate disclosure.

The Group adheres to a strict complaints procedure as directed by Chapter 12 of the Insurance Rule Book under the Insurance Business Act and operates its Complaints Management Policy through Complaints Management Function. Feedback from customers is ongoing with constant research through online questionnaires, analysis of the research including Net Promotor Score monitoring, feedback to customers following issues raised and root cause analysis of concerns raised.

#### **Relations with Shareholders**

Recognising the importance of keeping open communication with shareholders, the level of disclosure with these important stakeholders within the Atlas Group is in excess of statutory requirements under the Companies Act. An Annual General Meeting for shareholders of Atlas Holdings Limited is held each year and, besides the statutory business of the Annual General Meeting as laid down in the memorandum and articles of the Company, information on group performance is presented routinely to both the Group's Board of Directors and the PCC's Board of Directors. The Chairman of the PCC also communicates with shareholders through his directorship as Chairman on the Atlas Holdings Limited Board which convenes three times a year and where the PCC Core's major shareholding groups are represented. This structure also ensures that directors of the Company are kept aware of the priorities of the shareholders, and that this is transmitted down through to all subsidiaries.

The Board of Directors of Atlas Holdings Limited who are appointed by the shareholders in accordance with the Company's Memorandum and Articles are:

Lawrence Zammit MA (Econ) – Chairman  
Jackie Attard Montalto  
Catherine Calleja BA (Hons), ACII  
Michael Gatt  
Albert Formosa  
John Formosa  
Brian Valenzia  
Matthew von Brockdorff FCII  
Robert von Brockdorff

Cellular shareholders within the PCC are also addressed by the PCC's Board as is explained in the following sub sections.

### **Atlas Group Systems of Governance**

It has been reported earlier that Atlas Holdings Limited is captured as an insurance holding company under the SII directive and within its corporate structure owns 100% of the Core of Atlas Insurance PCC Limited. The PCC adopts the MFSA Corporate Governance Guidelines for Public Interest Companies, a public interest company. As a public interest company as well as a large private company as defined under these Guidelines, the PCC highlights adherence to this Code in its Annual Report. For this reason the PCC's Board ensures that the Group also adopts the MFSA's principles of good corporate governance for Public Interest Companies. Additionally the Group also adheres to various rules issued under the Insurance Business Act (Cap 403) and is guided by the EIOPA Guidelines on Systems of Governance and other international models of best practice.

## 3.2 Responsibilities, reporting lines and allocation of functions

The Solo Undertaking's members of the Board of Directors are elected by the shareholder at the Annual General Meeting of the PCC

There is a clear division of responsibilities at the Solo Undertaking between the running of the board and the executive responsibility for the running of the business. The separation of the Chair and Chief Executive Officer roles increases the board's independence from management and leads to better monitoring and oversight and, ultimately, to board independence. The primary role of the Chairman of the board is to focus the board on the ongoing development and determination of the Group's strategy and direction. The Chairman creates and maintains the right conditions for constructive discussion and the participation of all directors to enable each director to play a full and constructive role in the affairs of the Group.

The Board of Directors establishes committees with delegated authority and clear reporting lines as described in sub-section 1.2 above and further elaborated under sub-section 3.2.1 below.

### 3.2.1 Responsibilities and reporting lines

#### **The PCC's Board of Directors**

The Atlas Board of Directors is appointed annually and assessed in order to ensure that members continue to be fit and proper and collectively have the required diversity of knowledge, judgement and experience to complete their tasks. Together, the board members are judged to have complementary skills and the necessary background in governance and corporate strategy, insurance, financial markets, risk management, financial and actuarial analysis, legal and regulatory frameworks as well as information technology and human resources management.

The board is appointed at the Annual General Meeting as per the Memorandum and Articles of Association of the PCC and during 2020, Mr Michael Gatt retired as Managing Director and was re-appointed as a non-executive director on the board. From April 2020, the board was thus composed of a majority of five Non-Executive Directors (NEDs), four of which being independent, and two Executive Directors one of whom was the newly appointed Managing Director and Chief Executive Officer (CEO) of the Solo Undertaking, Mr Matthew von Brockdorff. The other Executive Director on the board was the Group Company Secretary, who brings additional knowledge and experience to the table.

The current board members appointed by Atlas Holdings Limited are:

Lawrence Zammit M.A. (Econ.) – Chairman

Franco Azzopardi M.Sc. (Leicester), F.I.A., C.P.A. – Non Executive

Andre Camilleri LL.D, Dip. Econ. & Ind. Law (Milan) – Non Executive

Catherine Calleja B.A.(Hons.), A.C.I.I. – Executive and Company Secretary

Michael Gatt – Non Executive

Philip Micallef B.Sc.(Eng.), M.I.E.E., C.Eng., Eur. Ing., M.B.A. (Warwick) – Non Executive

Matthew von Brockdorff F.C.I.I. – Managing Director and Chief Executive Officer

The board maintains close links with senior management both through the active board committees but also through various joint meetings on various issues from information sessions on new legislative developments to aspects of strategy development. This enables the board to be able to continuously

assess the Group's key results, its current and future strengths and weaknesses as well as being able to have enough information to be able to develop informed assessment of ongoing performance, constructively challenge and develop strategy as well as satisfy itself on the integrity of the financial information, internal controls and risk management systems in place. The board is fully involved in significant decision taking including the budgetary and Own Risk and Solvency Assessment (ORSA) processes and regularly meets with key function holders including the PCC's actuaries.

The positions of the independent Chairman and Managing Director remain separate and there is a clear division of responsibilities between the running of the board and the executive responsibility for the running of the Group's business. The independent Chairman serves as a valuable sounding board and mentor for the CEO, which role had increased significance during this year of transition. The four other non-executive directors appointed are of sufficient calibre and standing to balance the strength of character of the Chair and executive directors. The Chair encourages discussion and participation of all directors during discussions as well as constructive relations between executive and non-executive directors.

As provided for in the Memorandum and Articles of the PCC and in line with the System of Governance requirements under the Solvency II Directive and the Commission Delegated Regulations, the board has delegated specific responsibilities to board committees. Non-executive directors chair five board committees being the Audit, Investments, Risk and Compliance, IT and Remuneration and Nominations Committees. Through these committees, non-executive directors can take more active roles in the development of strategy in the different areas of the organisation under review, recognise and support innovation within the management of the Group, always striking a balance between enterprise and control at Atlas. The involvement in the committees allows non-executive directors to further scrutinise performance, key risks as well as to satisfy themselves that financial controls and risk management systems are well established.

The primary role of the Chair is to focus the board on the determination of the Group's strategy and direction. He leads the board and sets the agenda and the order of that agenda, in collaboration with the Company Secretary. The Chair ensures that the board receives precise, timely and clear information, where possible directs discussion to the emergence of a consensual view and sums up discussions to ensure the accurate recording and follow up of the key decisions taken. Mr Lawrence Zammit, as Chair of the board, also chairs the Atlas Holdings board where the significant shareholding groups of the Company appoint directors. This ensures effective communication with shareholders.

Dr Andre Camilleri is the Senior Independent director, providing a sounding board for the Chairman and CEO on board matters, as well as a trusted intermediary, if required, for other non-executive directors. This Senior Independent Director is also available to address the concerns of shareholders or members of staff, through the Group's raising a Concern (Whistleblowing) Policy. He also annually administers the board evaluation process during the last quarter. This includes discussing the results of the board committee evaluation questionnaires, an important component of the board's annual review process and leads to setting the board objectives, including learning and development goals for the following year. The Senior Independent Director also chairs the Risk and Compliance Committee.

The CEO is responsible for the overall success of the Group and is answerable to the board for the realisation of the Group strategy. He also chairs the Executive Committee and Protected Cells committees.



Board and board committee meetings are scheduled prior to the start of each year and, during 2020, the board met 13 times, several extra ad hoc meetings being held for the board to be able to closely monitor the COVID-19 related developments. Three meetings were dedicated to specific matters of strategic importance including the Group Own Risk and Solvency Assessment process.

### **Executive Committee (EXCO)**

This Committee is chaired by the Chief Executive Officer. From 2020, besides the two executive directors, the Chief Underwriting Officer, the Group Chief Financial Officer, the Chief Strategy Officer, the Chief Information Officer, the Chief Commercial Officer and the Chief Officer – Personal Insurance Operations sit on the committee.

This Committee met eleven times in 2020 but also met on specific issues with the board on several other occasions during the period especially during the initial period of the COVID semi-lockdown. It also participated in several board education initiatives. The minutes of the meetings of this Committee are copied to board members, and matters arising are regularly discussed at board meetings.

The Executive Committee is responsible for implementing the strategy of the Group developed with the board. This involves development and deployment of business plans and detailed budgets on an annual basis to achieve the key results developed with the Board of Directors. It is also heavily involved in policy development and change in various areas of the Group including information systems planning, human resources development and talent management, sales and marketing, and the consideration of new business opportunities.

### **Other Board Committees**

The board delegates specific responsibilities to a number of board and executive committees, notably the Audit, Risk and Compliance, Remuneration and Nominations, Investment, Information Technology and the Protected Cells Committees.

These committees have charters which are set and regularly reviewed by the board. Committee meeting progress and matters arising from minutes of meetings are regularly discussed at board level.

### **COVID-19 Pandemic**

The PCC's Board of Directors recognised the gravity of the developing pandemic in Europe in early 2020 and, through its executive, invoked the Group's Business Continuity Plan. A dedicated COVID-19 response team was set up in order to monitor developments on a daily basis. Atlas' readiness in terms of business continuity meant that disruptions to the daily operations were kept to a minimum. Atlas continues to look at the longer term impact on its risk management & internal control systems, as the risks that the Group faces may change in the light of the continuing economic crisis.

Atlas maintains ongoing communication with the various cell owners to understand and review the mitigation measures undertaken during the 2020 to ensure continuity of the operations of the cells.

## **3.2.2 Group structure and allocation of responsibilities**

The Board of Directors of the PCC have identified key function areas of responsibilities as defined in Chapter 6 under Malta's insurance regulations. These key function areas of responsibility are those identified as the:

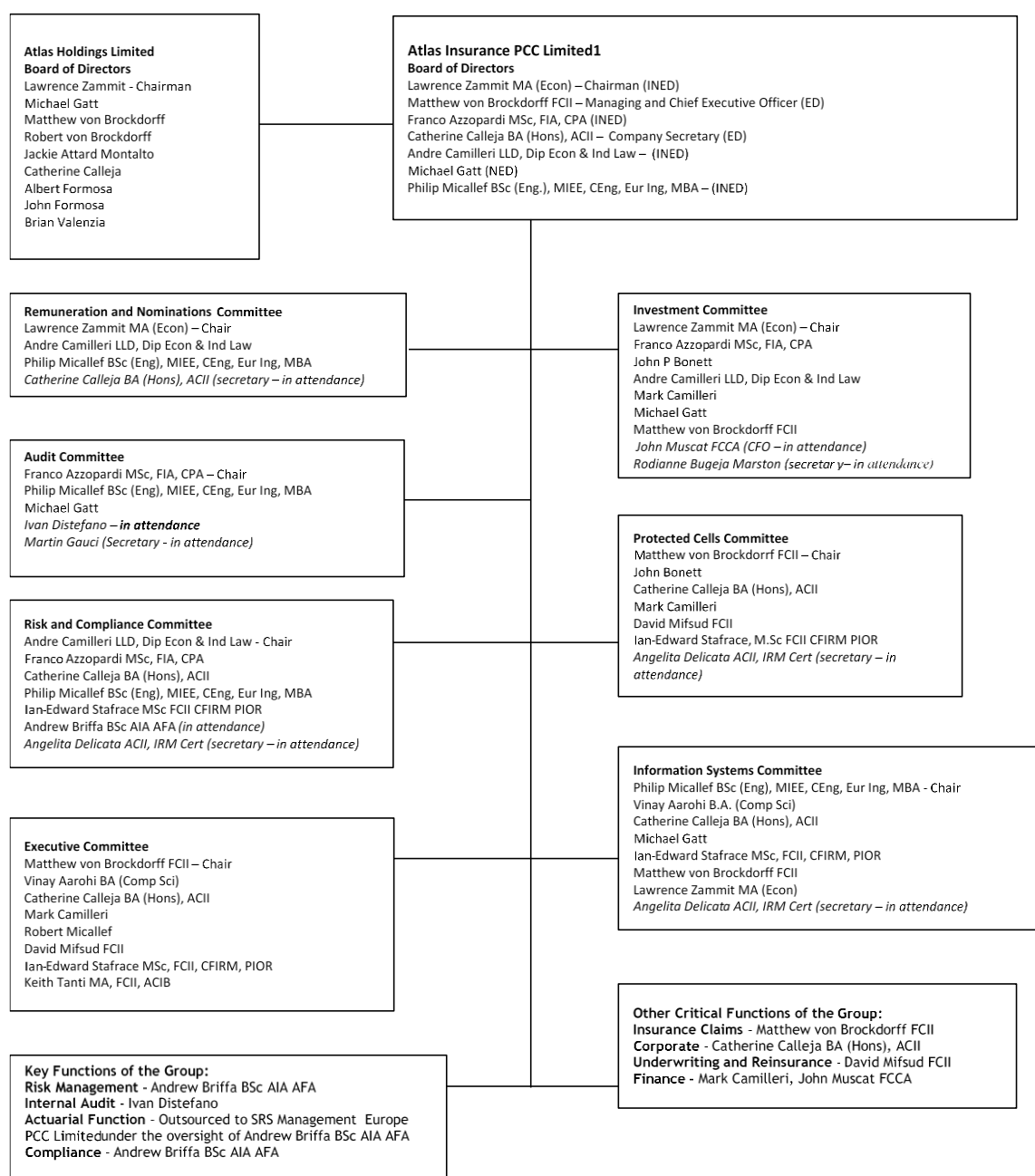
- Actuarial Function

- Risk Management Function
- Internal Audit Function
- Compliance Function

The Board of Directors has also identified other critical functions of the Group and these are:

- Insurance Claims
- Corporate
- Underwriting and Reinsurance
- Finance
- Information Systems
- Marketing and HR
- Complaints Handling
- Investments

## Atlas Group Governance Structure



### Key

INED: Independent Non-Executive Director, NED: Non-Executive Director, ED: Executive Director

### 3.2.3 Board committees

As provided for in the PCC's Memorandum and Articles and in line with the System of Governance requirements under the Solvency II Directive and the Commission Delegated Regulations, the board has delegated specific responsibilities to board committees. The Audit Committee, the Remuneration and Nominations Committee, the Risk and Compliance Committee, IT Committee and the Investments Committee are all chaired by independent directors and oversee policy and controls in these important areas.

The Protected Cells Committee, the Information Technology Committee and the Executive Committee provide additional support and information to the board. Appointment to all the above mentioned committees is the prerogative of the board of directors. Each committee enables a high level of interaction with key functions reporting to such committees and to the boards of group companies. The board is also copied with minutes of the committee meetings and matters arising from such committees are a standard agenda item at board meetings. The committees also have charters, which are set and annually reviewed by the board and they also annually review their performance.

### **Audit Committee**

The committee met six times during 2020. The committee, composed entirely of non-executive directors, is chaired by Mr Franco Azzopardi who has the required competence in financial literacy and expertise in accounting, internal controls and auditing to perform this function. Other members of the committee are Mr Philip Micallef, and Mr Michael Gatt who joined this committee in April 2020. Mr Lawrence Zammit resigned from the committee in April 2020 upon the appointment of Mr Michael Gatt. During the period under review the committee also commissioned an external review of the internal audit operations.

The Committee has oversight of the independent audit of the financial statements as well as the audit scope and approach, the performance of the Group's external auditors as well as that of the Group's internal audit function and internal control systems. It also reviews and assesses the qualitative aspects of financial reporting to shareholders and discusses significant accounting and reporting issues. It meets with external auditors, to review any problems or difficulties they encounter as well as to review audit plans prior to the commencement of audit cycles and finally to review financial statements prior to their presentation to the board. The Committee also takes responsibility for the selection process for external auditors as well as reviewing and monitoring the independence of the external auditors. It also pre-approves any permitted non-audit services to be performed by the auditors.

As part of its oversight of the internal audit function, the Committee is involved in the setting of risk based annual internal audit plans for the Group. It ensures that the internal audit plan takes into account all the activities and the complete system of governance as well as expected developments of activities and innovations. It also reviews the internal audit function's performance relative to the plan, documentation produced and information on achievement of previous audit recommendations. Regular liaison with the Risk function and indeed the collaboration with the Risk and Compliance Committee enables the Audit Committee to obtain input and contribute towards setting priorities aligned with the Group's risk register and risk appetite. The Committee also reviews protected cell issues and monitors results of cell inspections and related internal control systems. Meetings between the Committee, other board committee members and members of senior management also take place, especially in the area of financial controls.

The Internal Auditor reports directly to the Audit Committee which in turn ensures that the function is free to work independently and objectively. The committee also ensures that the internal auditor has the necessary resources and access to information to fulfil the mandate of the function and does not perform any operational functions. The committee benchmarks the function's activities against recognised standards such as, inter alia the Institute of Internal Auditors and the International Standards for Professional Practice of Internal Auditing as well as Regulatory requirements. The Internal Audit function, through the Audit Committee and its Chairman, has direct access to the Board of Directors and meets regularly with the Group's Chief Risk and Compliance Officer.

During 2020, the Audit Committee Chair regularly held additional meetings with the Internal Auditor, Mr Ivan Distefano. These meetings give guidance, serve as an opportunity to receive feedback, and

ensure the continued independence of the internal auditor as well as his continuing professional development. The oversight of related party transactions is also the responsibility of this Committee.

### **Remuneration and Nominations Committee**

This committee, composed entirely of independent non-executive directors, met four times during 2020. The board Chair also chairs this Committee and is considered by the board to have the required knowledge, experience and skills for this position. Dr Andre Camilleri, the Senior Independent Director, and Mr Philip Micallef are the other two non-executive Directors appointed to sit on the Committee. Executive Directors and the Chief HR Officer attend meetings by invitation as and when required.

As per the EIOPA Guidelines on Systems of Governance, this Committee is established to exercise competent and independent judgement on the Group's Remuneration policy and its oversight. The Committee also assists and advises the board on matters relating to the remuneration of the board and senior management and, in particular, determines the remuneration of the Executive Directors and members of the Executive Committee. The Committee approves the structure and design of performance related pay schemes and approves annual payments made under this policy. The Committee also ensures that provisions regarding disclosure of remuneration are fulfilled and that the Remuneration Policy is applied consistently across the Group and complies with legal requirements. Furthermore it ensures that material risks at Group level linked to remuneration issues are managed and that regular benchmarking exercises of senior management salaries are carried out.

In terms of Article 8(1) of the Insurance Business Act and, more specifically, as per Insurance Rulebook's Chapter 2: Fit and Proper Criteria, Notification and Assessment, the Group ensures that all persons who effectively run the undertaking or have other key functions are at all times 'fit and proper' persons. The Committee oversees the process of ensuring the continuing fitness and properness of relevant individuals. Questionnaires are completed and independent checks using various sources are also carried out on an annual basis.

The size and complexity of the Group does not necessitate a separate nominations committee and the remuneration committee also leads the process of succession planning for board appointments and as such makes recommendations to the board and shareholders for such appointments.

### **Risk and Compliance Committee**

Dr Andre Camilleri, as the designated director for oversight of the risk management system, chairs this committee. The committee met four times in 2020. Mr Franco Azzopardi, Ms Catherine Calleja, Mr Philip Micallef, Mr Ian-Edward Stafrace form part of the Committee. Mr Andrew Briffa, an Associate Actuary of the UK Institute and Faculty of Actuaries and the Chief Risk and Compliance Officer (CRCO), regularly attends meetings.

With the support of the CRCO, the Committee coordinates, facilitates and has oversight of the risk management function including the development of the Group's risk appetite and ongoing risk strategy and governing policies. The Committee also oversees risk management at Group level, monitoring developments in the Group's policies, strategy, operations, and environment that may significantly affect uncertainties faced by the organisation. It also reviews quarterly status reports on the Group's risk appetite in the major risk categories, as well as regular reports relating to the various risk areas of accountability assigned across the organisation and any significant incidents including any near misses, both in the core and in cell operations. The committee also has oversight of the Compliance function ensuring that the Group continues to maintain its systems to ensure regulatory compliance and readiness for anticipated regulatory changes in various areas.

The Committee, together with the board, continues to develop its role in evolving the methodology and assumptions underlying the models for determining the Group's economic and regulatory capital requirements as assessed under the ORSA (Own Risk and Solvency Assessment) process. Key members of the senior management team are invited where relevant to the discussion and regular attendance from external experts such as those in the area of Cyber risk is also a feature of the committee meetings. The committee continued to monitor closely the Group's adherence to the highest of standards in cyber security, which became even more crucial during the COVID period, for Group Companies, TILs and outsourced functions. The committee also reviews customer complaints and the related root cause analysis, as well as relevant training in various areas of compliance and risk management.

### **Investments Committee**

This Committee ensures that the Group's investment management is conducted according to the Investments Policy, the Asset Liability Management Policy and the Board's Risk Appetite Statement. The Committee acts in accordance with the Prudent Person Principle as stipulated in Article 132 of the Solvency II Directive.

The Committee met four times in 2020 and Mr Lawrence Zammit continued to chair the Committee during the period under review. Members included Dr Andre Camilleri, Mr Franco Azzopardi, Mr Michael Gatt and Mr Matthew von Brockdorff, Chief Executive Officer, as directors on the committee while the Group Chief Financial Officer, Mr Mark Camilleri and Mr John Bonett are additional members. The Chief Financial Officer Mr John Muscat also attends meetings by invitation as and when required.

The Committee sets investment parameters, mandates with discretionary managers, and asset allocations in line with the Investment Policy, the Asset Liability Management Policy and the Board's Risk Appetite Statement. It annually reviews the Investment Policy, the Asset Liability Management Policy and the relevant parts of the Risk Appetite Statement to ensure alignment between these policies and regulatory requirements.

The Committee also engages, after board appointment, investment services providers entrusted to manage the investment portfolio on a discretionary basis, and reviews the performance of such managers. Managers regularly address and report to the Committee and other board and Executive Committee members attend these presentations. Detailed performance reports are provided to Investment Committee members at committee meetings and summary performance reports provided to the board at board meetings. Any investments made in excess of their mandate are always referred and subject to the Board's Risk Appetite or with the Board's exceptional approval. The Committee also oversees the PCC's property investments and recommends action to the board. The committee has also embarked on the journey to build sustainability into its investment strategy.

### **Information Technology Committee**

This Committee addresses strategic issues relating to Information Technology and digital transformation. The committee is chaired by Mr Philip Micallef and the members are Mr Lawrence Zammit, Mr Michael Gatt, Mr Matthew von Brockdorff, Ms Catherine Calleja Mr Ian Stafrace and Mr Vinay Aarohi who is the Chief Information Officer. The committee met seven times during 2020 and has been very involved in the Atlas digital transformation process.

This Committee's mandate is to ensure that IT priorities, particularly during the deployment of this new digital platform, are aligned with the Group's strategy and that the major IT investment and expenditure deliver the expected results. The committee supports Atlas Management on IT policy, strategy and governance and reviews the reports obtained by external consultants in this area.

### **Protected Cells Committee**

This Committee proposes policy to the board in relation to underwriting policy for the acceptance of protected cells within the Solo Undertaking. It has oversight over the operational and financial progress of each cell, including its solvency and any potential impact on the solvency of the Atlas core and also ensures that regular cell inspections are carried out. The Committee also, where applicable, oversees relationships with cell managers and quarterly cell KPIs are submitted to the board of directors as part of the financial reporting process. During 2020 there was increased activity in this area of the business and detailed cell application proposals were presented to the board for approval, prior to submitting them to the Regulator. The committee has overseen the process of the PCC's acceptance into the UK's Temporary Permissions Regime by the UK FCA/PRA which ensured the continued right to write UK business following December 2020.

The CEO continues to chair the Committee, which met four times in 2020. The committee was composed of the two Executive Directors as well as the Chief Underwriting Officer, the Chief Strategy Officer and the Group Chief Financial Officer, as well as Mr John Bonett during 2020.

The Chief Underwriting Officer and Group Chief Financial Officer, as representatives of the Committee, form part of the cell committees of the individual cells. Cell owners and managers where relevant also form part of the individual cell committees which meet regularly to review underwriting results, financial performance and risk management and compliance issues. The Committee is delegated with the responsibility to approve charters and membership of the said cell committees, which are central to the maintenance of the positive ongoing relationship with cell shareholders as well as to ensure a deeper understanding of the cell performance and any potential risks to the core.

### **Individual Cell Committees**

Each Cell Committee includes the PCC's Chief Underwriting Officer and Group Chief Financial Officer with delegated authority approved by the Board. These two officers of the PCC are also supported by the Chief Strategy Officer and the Chief Financial Officer. The other members could include representatives of the cell owner and where applicable of the insurance management company.

The Chief Underwriting Officer and Group Chief Financial Officer, as representatives of the Committee, form part of the cell committees of the relative cells, which review financial performance, risk management and compliance issues relating to cells together with cell owners and managers. The members of each individual Committee also approve charters of the said cell committees, which are central to the maintenance of the positive ongoing relationship with cell shareholders.

The individual Cell Committees are part of the first line of defence in managing the risks of the respective cells. Atlas requires Cell Committees to have as a minimum a standing agenda item to "Review progress of outstanding items on past cell site inspections, audits or compliance visits" where outstanding items apply. Cell Committee meetings predominantly discuss arising/pending risk and compliance items besides general performance, however a general item "other risk and compliance matters" must be kept as a standing item in each agenda.

### 3.3 Fit and proper requirements

As a supervised Group, the Atlas Group must apply fit and proper criteria on an ongoing basis for all persons who effectively run the operation or hold other key functions. In terms of article 8(1) of the Insurance Business Act and more specifically as per Insurance Rules Chapter 2: Fit and Proper Criteria, Notification and Assessment, Atlas Group should ensure that all persons who effectively run the undertakings or have other key functions are at all times 'fit and proper' persons.

Atlas Group's Fit and Proper Policy regulates the compliance procedures which are implemented within the Group. To ensure that the foregoing policy statement is carried out, and to ensure adherence with all related legislation, the Atlas Holdings Limited Board of Directors established and approved such Policy for the Group.

The Atlas Holdings Board has delegated to the PCC's Board and eventually to the Group's Remuneration and Nomination Committee authority and responsibility for fitness and properness requirements in accordance with the Committee Charter approved by the Atlas Board.

#### 3.3.1 Applicability

The Policy applies to:

- a) Persons who effectively run the Atlas Group i.e. Directors (Executive and Non-Executive, including directors responsible for distribution activities), Controllers or Chief Executive Officers;
- b) Persons responsible for the key functions or overseeing key functions where the function is outsourced ('key function holders');
- c) Qualifying shareholders of the Atlas Group, including Cell Owners in the case of a cell company;
- d) Persons registered in the Agents or Managers register and carrying out insurance distribution activities
- e) Managers and Individuals who are responsible for the effective management of Atlas Group's Branches;
- f) Money Laundering Reporting Officer;
- g) Atlas Group's Tied Insurance Intermediaries and Ancillary Insurance Intermediaries;
- h) Members of Atlas Group's various Board Committees;
- i) Persons within the management structure designed to be responsible for the distribution of insurance products ('relevant persons') in terms of Chapter 6 of the Insurance Distribution Rules;
- j) Investment advisors.



### 3.3.2 Requirement of fitness and properness and implementation

In terms of article 8(1) of the Insurance Business Act and more specifically as per Insurance Rule's Chapter 2: Fit and Proper Criteria, Notification and Assessment, Atlas Group should ensure that all persons who effectively run the undertakings or have other key functions are at all times 'fit and proper' persons.

In deciding whether a person is 'fit and proper', Atlas Group should be satisfied that the persons listed indicated above:

- a) Have the personal characteristics, including that of being of good repute and integrity (proper);
- b) Have the professional qualifications, and possess the adequate level of competence, knowledge and experience, as well as being financially sound (fit),

so as to enable such persons to carry out their duties and perform the key function effectively and to enable sound and prudent management of the relevant Companies.

Prior to the appointment of any person mentioned above, the Group conducts due diligence procedures in order to ensure they are fit and proper by conducting checks on:

- Integrity and reputation
- Identity verification
- Ability to work in Malta from a regulatory perspective
- Reliability based on past working experience
- Financial stability
- Conflict of interest

Furthermore, Atlas Group ensures that the persons proposed/performing a key function are in possession of relevant qualifications.

Key function	Qualification
<b>Risk Management function</b>	<ul style="list-style-type: none"><li>- Risk Management qualification from a reputable professional or tertiary education institution; or</li><li>- Financial services qualification from a reputable professional or tertiary education institution; or</li><li>- Engineering/Scientific qualification from a reputable professional or tertiary education institution.</li></ul>
<b>Compliance function</b>	<ul style="list-style-type: none"><li>- Legal qualification from a reputable professional or tertiary education institution; or</li><li>- Financial services compliance qualification from a reputable professional or tertiary education institution; or</li><li>- Other financial services qualification from a reputable professional or tertiary education institution.</li></ul>

<b>Internal Audit function</b>	<ul style="list-style-type: none"> <li>- Internal/Quality auditing qualification from a reputable professional or tertiary education institution; or</li> <li>- Financial services (including accounting) qualification from a reputable professional or tertiary education institution; or</li> <li>- Scientific qualification from a reputable professional or tertiary education institution.</li> </ul>
<b>Actuarial function, where the insurance undertaking carries on life insurance business (not writing with-profits business and/or life insurance business with guarantees) and/or non-life companies</b>	<ul style="list-style-type: none"> <li>- Fellow of the Institute and Faculty of Actuaries (UK) or actuarial qualifications of similar standing from a reputable institute</li> <li>- Certified Actuarial Analyst (CAA) offered by the Institute and Faculty of Actuaries (UK) or actuarial qualifications of similar standing from a reputable institute</li> </ul>

If a company within Atlas Group outsources its key functions, fit and proper procedures are carried out in assessing persons employed by the services providers or sub-service providers to perform an outsourced key function.

### Implementation and Controls

In order to ensure that this policy is fully implemented and controlled Atlas Group has delegated to the Company Secretary the responsibility for Compliance in respect of the above regulatory requirements. In the Atlas' Group Compliance Control Calendar the following controls have been set:

- The Company Secretary is responsible for correspondence with MFSA in matters relating to appointment of new individuals listed above and their ongoing monitoring, where required,
- The responsibility for the notification to the MFSA that any such person has ceased to hold such a position or changed also rests with the said Company Secretary.
- Any person who no longer meets any of the Fitness and Propriety criteria will need to be referred to the Remuneration, Nomination and Related Parties Committee for discussion as to their future position within the Group.

Furthermore the Group also has a performance management system whereby roles and responsibilities of all persons holding positions of responsibility including board members and management are clearly defined and regularly assessed.

The Group also carries out certain procedures which are specific to the relevant position. In this regard, when it comes to **persons holding a key function** position, the Group ensures that they hold recognised qualifications by obtaining a copy of the certificate/transcript/ records evidencing the qualifications. The Group also monitors compliance with ongoing continuing professional development (CPD) requirements.

In this regard a “Fitness and Properness Questionnaire” is requested by the Group to be filled in by the persons involved on an annual basis and the questionnaire is submitted to the Group’s Company Secretary who, together with the Group Chief Risk and Compliance Officer, carries out the assessment. Regular related checks on involvement in litigation, creditworthiness and listing in sanctions lists and conflicts of interest are also carried out.

In addition, fitness and properness of the Group’s Tied Insurance Intermediaries is controlled by the completion of a Specific Tied Insurance Intermediary Questionnaire. Such Tied Insurance Intermediaries need to complete such Questionnaire on an annual basis and submit it to the Group’s Branches and Intermediaries Manager who, together with the Company Secretary and the Group Chief Risk and Compliance Officer, assess the fitness and properness of such Tied Insurance Intermediaries.

## 3.4 Risk management system, including the Own Risk and Solvency Assessment

### 3.4.1 Governance framework

The PCC's Board of Directors follows a Group wide Risk Management Policy and this Section outlines key elements of the Risk Management Framework adopted by Atlas Group.

For the purposes of regulatory compliance with Solvency II regulations and guidelines, the Risk Management Policy addresses the requirements to have in place strategies, processes and reporting procedures necessary to identify, measure, monitor, manage and report, on a continuous basis, the risks, both at an individual and at an aggregated level, to which Atlas Group is or could be exposed.

This policy covers internal controls, operational RM, strategic RM, reputational RM as well as the Own Risk and Solvency Assessment (ORSA) process. The ORSA process itself is a key element towards the Enterprise Risk Management (ERM) approach adopted by Atlas.

This policy is reviewed on a yearly basis and should reflect any regulatory, organisational and risk environment changes. It is also the RM Function's objective to regularly review the risk management processes and procedures, as well as risk management practices, tools and methodologies.

Related policies, charters (terms of reference) and other documents that also contribute to having in place an effective RM system are:

#### Governance & Strategy

- Business Planning Cycle and Atlas Group Strategy
- Risk & Compliance Committee Charter
- Audit Committee Charter
- Internal Audit Policy
- Investments Committee Charter
- Actuarial Governance Policy and Terms of Reference

#### General

- Risk Appetite Statement
- Risk Register
- Capital Management Policy
- Fit & Proper Policy
- Remuneration Policy
- Outsourcing Policy
- Business Continuity Management Policy
- Common Risk Language

#### Risk Specific

- Asset Liability Management Policy
- Credit Risk Policy
- Investment Policy
- Liquidity Risk Policy
- Underwriting & Reinsurance Policy
- Claims Management Policy
- Compliance Policy

#### Protected Cells

- Cells Committee Terms of Reference
- Committee Terms of Reference of individual Cells
- Operations Manuals of individual Cells

Board policies are reviewed on a yearly basis to reflect regulatory, organisational and risk environment changes.

### Risk Strategy and Guiding Principles

***"Atlas Group believes that good risk management that is visible, repeatable and consistently applied to support decision making increases probability of success and reduces probability of failure and the uncertainty of achieving overall objectives."***

The risk strategy defines the extent to which the Group is prepared to incur risks. The risk strategy describes the extent to which a risk is desirable and, consequently, whether it is acceptable or must be mitigated through risk limits or budgets, risk controls or risk transfer. The risk strategy is therefore determined by the risk appetite, which in turn is defined by a series of risk criteria.

Atlas' approach to risk management is guided by a number of principles. These include risk transparency, proportionality, management accountability, independent oversight, fit and proper as well as risk awareness and culture. Risk management is embedded into the culture of the organisation with all staff playing an active role in the management of risk as defined within their accountability profiles.

The implementation of risk management at the operational level includes the identification, evaluation and assessment of risks, and the resulting risk response and monitoring. This broad four-stage RM Process is emphasised with all Atlas staff in training and workshops that is to be also applied in decision-making, objective setting and project management with the aim of ensuring such is embedded into the Group's risk culture:



1. The **risk identification** process produces a comprehensive list of risks that are organised by risk category and sub-category within the Risk Register. The quantitative component of risks is identified by means of appropriate systems and indicators, and these are supplemented by expert judgment and assessments by the Risk Manager and the Risk Committee to further assess the qualitative component.

2. The **risk assessment** process has the purpose of determining how big the risks are, both individually and collectively, in order to focus management's attention on the most important threats and opportunities, and to lay the groundwork for risk response. Risk assessment is all about measuring and prioritizing risks so that risk levels are managed within the defined tolerance thresholds.

3. The **risk response** process involves determining how to respond to the assessed relevant risks. Responses include risk avoidance, reduction, sharing, and acceptance. In considering the type of response, an assessment of the effect on risk likelihood and impact as well as on costs and benefits need to be carried out, selecting a response that brings residual risk within the desired risk tolerance limits.

As with assessing inherent risk, residual risk may be assessed qualitatively or quantitatively. Generally, the same measures used in assessing inherent risk are used in assessing residual risk.

4. The **monitoring** process involves reviewing the entirety of the risk management processes and procedures and to make modifications where necessary. This is accomplished through ongoing monitoring activities, separate evaluations, or a combination of the two.

Some risks are dynamic and require continual ongoing monitoring and assessment. Other risks are more static and require reassessment on a periodic basis with ongoing monitoring triggering an alert to reassess sooner should circumstances change.

A key consideration in the above processes is the availability of information. Information is needed in all functions and in all processes to identify, assess, and respond to risks. In this respect, internal communication is fundamental to create the right internal environment and have adequate information flows.

### Roles and Responsibilities

Atlas adopts a three lines of defence approach considered as best practice. Responsibilities are defined in the Risk Management Policy along this approach:



As a first line of defence, all individuals are responsible for the management of risks in their respective areas. Risk owners and management have ownership, responsibility and accountability for identifying, assessing, controlling and mitigating risks together with maintaining effective internal controls. Risk management responsibilities are accordingly incorporated in the accountabilities of the individuals concerned. The second line of defence facilitates and monitors the implementation of effective risk management practices by operational management and risk owners. As a third line of defence, the internal audit function, through a risk-based approach, provides independent assurance to the organisation's board and senior management, on how effectively the organisation assesses and manages its risks, including the manner in which the first and second lines of defence operate.

In this regard the Group adopts a four-eyes principle whereby significant decisions are required to be supported by at least two persons having major decision-taking powers. Sufficient segregation of duties is required to be maintained to ensure persons performing tasks are not also responsible for monitoring and controlling the adequacy of this performance. Where such is not possible then any potential conflicts of interest are managed appropriately to safeguard proper decision-taking or task execution.

### 3.4.2 Risk register

The central active risk management document used by the Group is the Risk Register, which comprehensively captures the risks the organisation is exposed to under all Risk Categories, and for each risk identified it establishes:

- The Risk Category and detailed risk description;
- The Risk Owner (and assistants to the risk owner where applicable) responsible for the risk as part of the Group's first line of defence;
- The Atlas Group companies in scope if not Group wide
- Evaluation of risk's inherent and residual likelihood and severity together with its ranking in relation to other risks;
- Risk Appetite and Key Risk Indicators (qualitative &/or quantitative);
- The associated internal controls;
- Any planned future controls of the risk.

The risk register is in constant evolution, due to the ongoing processes of identification of new risks, changes to existing risks, changes to risk owners, formalisation or improvement of risk controls and internal audit exercises.

The risk register is maintained by the CRCO through input from Risk Owners, Senior Managers and staff in general in accordance with the established roles and responsibilities, and is reviewed by the Risk & Compliance Committee.

### 3.4.3 Risk evaluation

The Group defines the following risk categories:

<b>Risk Category</b>	<b>Definition</b>
<b>Operational</b>	Potential losses resulting from inadequate or failed internal processes, people or systems, or from external events. Operational risk includes risks of internal and external fraud, as well as legal risks.
<b>Underwriting</b>	Risk of loss arising from the inherent uncertainties as to the occurrence, amount and timing of insurance liabilities. This is only applicable to Atlas PCC.
<b>Credit</b>	Risk of a financial loss if another party fails to perform its obligations or fails to perform them in a timely manner. Key counterparties include reinsurers, financial institutions, intermediaries, ceding companies & insureds.
<b>Market</b>	Risk that arises from fluctuations in values of, or income from, assets or interest or exchange rates. Credit risk associated with bonds is captured under this category, as is market concentration risks associated with equity, bonds and property. The Group considers Liquidity Risk (defined as the risk that the Group is unable to realise investments and other assets in order to settle financial obligations when they fall due) under the Market Risk category
<b>Strategic</b>	Risk of the current and prospective impact on earnings or capital arising from wrong business decisions, improper implementation of decisions, or lack of responsiveness to industry changes. The Group considers Reputational Risk (defined as the risk of a potential loss through the deterioration of the Group's reputation or standing due to a negative perception of the Group's image among policyholders, counterparties, shareholders and/or supervisory authorities) under the Strategic Risk Category

The categorisation follows best practice and current regulations.

The Group identifies its **Credit risk** through the review and measurement of the factors that could affect the credit rating of its counterparties, intermediaries and insureds.

Atlas Group assesses the creditworthiness of all reinsurers, intermediaries and customers by using credit grade references provided by rating agencies, and other publicly available financial information. Where this information is not available the granting of credit facilities to customers and intermediaries would be dependent on trends and historical data in order to obtain comfort on creditworthiness.

#### 3.4.4 Risk appetite

The Atlas Group takes on and manages risks to achieve its objectives. The Board has set a risk appetite statement that broadly describes the types and amounts of risk which the Group is willing to take in pursuit of these objectives.

The Group's objectives include achieving target performance and maximising shareholder value, preserving a level of solvency that would support the Group in challenging environments, maintaining adequate liquidity to satisfy obligations as they come due, and protecting all aspects of Atlas Group's value, including its brand and reputation.

Underlying the Group's risk appetite are risk tolerances, high-level quantitative measures and qualitative assertions for the maximum risk allowed, set at corporate level and in line with the needs of our stakeholders. At the highest level, they are intended to assure we maximise the likelihood of delivering on our mission, strategy and objectives.

Risk Appetite is cascaded down by senior management into more detailed expressions of appetite or limits applicable to each business function and each risk described in the Risk Register. This facilitates risk-taking decisions of all employees.

#### 3.4.5 Reporting processes for the risk management system

As already expressed in this report the Group adopts a wide and detailed reporting process with the Board of Directors ultimately having full overview.

The Risk and Compliance Committee reviews updates given by the Risk Management Function through reports dealing:

- Risk appetite status updates
- Periodic status updates on risk and compliance objectives and initiatives
- Updates on the risk and control reporting given by the Risk Owners
- Escalation of risk notifications from staff and management
- Updates on other risk events and near misses logged on the Risk Events Register
- Matters related to risks listed in the Risk Register and potential new risks being identified
- Matters related to the ORSA process
- The Own Risk and Solvency Assessment (ORSA) which is prescribed under regulation forms an integral part of the Group's reporting procedures on Risk Management Systems. The process is detailed under section 3.4.6 of this report.



### 3.4.6 Own Risk and Solvency Assessment

The Own Risk and Solvency Assessment (ORSA) is a continuous forward-looking process by which the Atlas Group, through an internal self-assessment, can assess all its present and prospective material risks and formulates its own required Economic Capital Requirements to mitigate these risks.

Article 45 of the Solvency II Directive states that as part of its risk-management system every insurance undertaking shall conduct its ORSA and that such shall include:

- a) the overall solvency needs taking into account the specific risk profile, approved risk tolerance limits and the business strategy of the undertaking;
- b) the compliance, on a continuous basis, with the regulatory capital requirements and with the requirements regarding technical provisions;
- c) the significance with which the risk profile of the undertaking deviates from the assumptions underlying the SCR.

The directive also states that the ORSA shall be an integral part of the business strategy and shall be taken into account on an ongoing basis in the strategic decisions of the undertaking.

The purpose of the ORSA report is to record the ORSA and present the results of that assessment. This includes the following for the year under review:

- a) Qualitative and quantitative results of the ORSA and the conclusions drawn from those results
- b) Methods and assumptions used
- c) Comparison between the overall solvency needs, the regulatory capital requirements and Atlas' own funds
- d) The capital requirements positions under stressed scenarios, as defined and chosen yearly by the Board for the specific ORSA process under review
- e) Sensitivity testing to identify potential vulnerabilities

The ORSA process produces a holistic enterprise-wide risk management evaluation and evidence of capital adequacy. It gives both the Board and senior management an effective tool to identify appropriate actions to influence the Group's risk profile and Economic Capital Requirements.

The process is steered by the Board and executed by the CRCO with input from the Actuarial Function. It is repeated at least once annually and whenever there is a material business change or strategic plan considered in accordance with the Risk Management Policy.

### 3.4.7 Risk management strategies, objectives and processes

The ORSA is required to reflect the business strategy. Hence, when performing the ORSA, Atlas Group takes into account the business strategy and any strategic decisions influencing the risk situation, regulatory capital requirement as well as overall solvency needs. A key input is any material update to Atlas' 3-Year Rolling Strategic Plan. The Board needs to be aware of the implications that strategic decisions have and to consider whether these effects are desirable, affordable and feasible over the business planning period, also considering the quantity and quality of Atlas' own funds.

Any strategic or other major decisions that may materially affect the Atlas Group's risk or own funds' position therefore needs to be considered through the ORSA before such a decision is taken. This does not necessarily imply a full performance of the ORSA. Atlas Group considers how the output of the last assessment of the overall solvency needs would change if certain decisions were taken and how these decisions would affect the regulatory capital requirements.

Where the Group is relying on management processes, in particular systems and controls, in order to mitigate risks, it considers the effectiveness of those systems and controls in a stress situation.

### 3.5 Internal control system

The internal controls environment is an integral part of Atlas Group's Risk Management. It encompasses controls relating to key processes and aims to ensure compliance with current law as well as operational efficiency. The ultimate responsibility for the internal controls environment lies with the PCC's Board of Directors. However, all employees play a key role in maintaining and improving the control system as part of its first line of defence.

In the Group's second line of defence, the internal controls, risk management and compliance functions are supported, facilitated and reviewed by the Risk & Compliance Committee.

As per defined roles & responsibilities, Atlas Group's third line of defence includes the key function of the internal audit that provides the required independent assurance and challenge across all business functions in respect of integrity and effectiveness of the risk management framework and its internal controls.

The organisation's internal controls environment is founded on a culture of ethical behaviour and accountability of processes. Based on the Fit and Proper Policy, all the key functions, including other critical functions, are assessed in terms of competence and ethical standards. Each employee and each process owner contributes to the internal controls environment by fulfilling an ongoing control function through everyday activity. The accountability profile of each employee includes the responsibility to "report systematically and promptly to senior management any perceived new risks or failures of existing control measures". The Board maintains a culture of openness within the Group to ensure employees report on potential threats and failures.

The Board of Directors sets the strategy for all the Group Companies and controls its implementation. The strategy is detailed in objectives, which are clear and measurable.

Additional internal control activities and monitoring mechanism include:

- a) Internal controls and audit mechanisms per risk as described in the Risk Register
- b) Intranet site documenting internal procedures and controls specific to each respective function and department
- c) Risk Owner annual reports
- d) Risk control calendar that is updated with any key controls that happen quarterly or less frequently
- e) Risk events register
- f) Quarterly Risk appetite status reporting

#### **Compliance Function**

Every authorised undertaking is required to identify an individual who will be responsible for ensuring adherence by the Group to all the requirements under the Act and under the Directive. Atlas Group has appointed for Compliance matters a Chief Risk and Compliance Officer as required under regulation. The compliance function plays a very important role in the Group's internal control processes with an emphasis on regulation. As previously stated, this responsibility falls within the remit of the Group's Chief Risk and Compliance Officer.

The Group's Risk and Compliance Officer makes use of the following internal control systems to ensure that the Group is abiding by all the Laws and Regulations:

- Compliance risk register
- Compliance Control Calendar
- Compliance Annual Reports received from the process owners
- Compliance Audits within the various departments by the Internal Auditor and followed by a Compliance/ Internal Audit Report
- Compliance Training Sessions
- Tied Insurance Intermediaries' (TIIs) Audits conducted by the Branches and Intermediaries team and followed by a Compliance Audit report
- Tied Insurance Intermediaries' Compliance Training Sessions
- Frequent updates on Compliance Matters to all Staff and Tied Intermediaries
- Drafting of various Guidelines made available to all Staff Tied Intermediaries
- Traffic Lights Reporting on compliance areas

### 3.6 Internal audit function

The Group Internal Auditor is responsible for conducting activities in accordance with international Internal Audit Standards and international best practices. For this purpose adherence to the Institute of Internal Auditors' (IIA) Code of Ethics, Standards for the Professional Practice of Internal Auditing and guidance position papers (as at January 2009 and October 2010), shall be construed as adherence to best International practices in the Internal Auditing field.

The Group Internal Auditor reports to the PCC's Audit Committee. For day-to-day operational purposes, liaison is with the PCC's Chief Executive Officer.

The organisational status promotes the independence of the function as a whole and allows the internal auditor to form their judgment objectively. The internal audit function has free and unrestricted access to management, employees, activities, physical locations and to all information considered necessary for the proper execution of the Group Internal Auditor's work. The Internal Auditor directs audit resources in a manner that ensures the delivery of the Internal Audit plan that is prepared by end October of each year. The Group Internal Auditor has full and unrestrictive access to the audit committee.

In fulfilling his responsibility in accordance with the above, the Group Internal Auditor:

- generally assumes an advisory role in the design, installation and operation of control procedures. Established controls are reviewed periodically in order to assess their continued effectiveness and application;
- is fundamentally concerned with the evaluation of the Group's management of risk. Its role in this respect is to provide assurance to management that key risks are effectively being taken into consideration by the Group's Risk Management Framework;
- reports diverging points of view with management and instances in which a request for access or response is not granted or provided in a reasonable time, format and manner to Senior Management and the Audit Committee;
- holds data and information obtained during the course of its audit activities with due care and the appropriate level of confidentiality. The Group Internal Auditor has the authority to grant, limit and restrict access to work papers and records;
- does not:
  - perform any operational duties for the organisation or its affiliates, and/or
  - initiate or approve accounting transactions external to the Internal Audit Function.
- co-ordinates the work with other internal functions and third parties that provide assurance on controls as a result of their activities. Generally, this includes the risk management and compliance functions within the Group and the external auditors and regulator/s as external parties.
- During the year under review, an external review of the Internal Audit function was carried out as required by regulation.

### 3.7 Actuarial Function

Article 48 of the Solvency II Directive places the Actuarial Function on a statutory basis covering, inter alia:

- Skill sets required for those working within the Actuarial Function;
- Tasks & responsibilities assigned to the Actuarial Function;
- Actuarial Function interactions with other prescribed functions under Solvency II (Risk and Compliance Function, Finance Function, Internal Audit Function); and
- Prescribed outputs & reporting required from the Actuarial Function on an ongoing basis.

The Group is required to have an Actuarial Function. The Board of Directors oversees that the Actuarial Function policy in place is adhered to.

In accordance with EIOPA guidelines, Atlas Group requires the actuarial function to provide input as to whether the Group and the Solo Undertaking would comply continuously with EIOPA requirements regarding the calculation of technical provisions and identify potential risks arising from the uncertainties connected to this calculation. The Actuarial Function is tasked to:

- a) apply methodologies and procedures to assess the sufficiency of technical provisions and to ensure that their calculation is consistent with the requirements set out in Articles 75 to 86 of the Solvency II Directive;
- b) assess the uncertainty associated with the estimates made in the calculation of technical provisions;
- c) ensure that any limitations of data used to calculate technical provisions are properly dealt with;
- d) ensure that the most appropriate approximations for the purposes of calculating the best estimate are used in cases referred to in Article 82 of the Solvency II Directive;
- e) ensure that homogeneous risk groups of insurance and reinsurance obligations are identified for an appropriate assessment of the underlying risks;
- f) consider relevant information provided by financial markets and generally available data on underwriting risks and ensure that it is integrated into the assessment of technical provisions;
- g) compare and justify any material differences in the calculation of technical provisions from year to year; and
- h) ensure that an appropriate assessment is provided of options and guarantees included in insurance and reinsurance contracts.

The Group's Actuarial Function is currently outsourced under an agreement with SRS Management Europe PCC Limited.

As Actuarial Function Holder, SRS are responsible to prepare the annual Actuarial Function Report, and to ensure that the results contained therein are accurate. The Certified Actuary remains Cherry Chan from Barnett Waddingham, UK, who is also supported by senior actuaries who run the valuation processes for the Group. Andrew Briffa has been appointed within Atlas to oversee the outsourced actuarial function.

Carrying out the tasks required of the Actuarial Function requires the application of expert judgement, including judgement on the choice of assumptions and methodologies adopted. Further detail of the methodologies and approach on these procedures are detailed under Section 5.3 of this report.

### 3.8 Outsourcing

Atlas Group oversees services provided to Group Companies by third parties on a continuous basis, which would otherwise be performed by the Atlas Group. The Group follows the Board approved Outsourcing policy.

Outsourcing of critical or important functions (key operational activities) is subject to particular oversight and approval by the regulator. Critical or Important Functions are fundamental activities of the firm, without which it would be unable to deliver its services to policyholders. Examples of such activities include pricing insurance products, investment management, claims handling, actuarial assessments and risk management. Any outsourcing agreement which could materially impact the performance or materially increase operational risk for Atlas Group would also be classified as material function.

#### **Due Diligence**

Before outsourcing any key or critical & important function, Atlas Group carries out a due diligence process on the service provider, irrespective of whether it is a supervised entity.

The due diligence process should assess:

1. the technical and financial ability of the service provider and its capacity to perform the outsourced function;
2. the internal control system of the service provider;
3. any conflicts of interest that may exist between Atlas Group and the service provider or arrangements with competitors;
4. track record;
5. reputation;
6. confidentiality/data protection concerns;
7. business continuity plans;

The results of the due diligence should enable Atlas Group to assess the level of risk it is facing as a result of the outsourcing. The due diligence exercise performed by the Group Companies and its outcome are documented to enable subsequent review at any time.

#### **Approval and Monitoring**

Outsourcing of key or critical/important functions is approved by the Board. Other outsourced functions can be approved by the CEO of the relevant Group company.

Approval is based on a business case specifying the scope and content of the outsourced function, the related costs and potential risks to the firm. The Board shall only grant approval of critical/important functions if it deems the governance requirements defined in this Outsourcing Policy are fulfilled.

The Compliance function maintains a Register of outsourced functions. A list of all outsourced functions is presented once a year to the Board through the Atlas Group's Risk and Compliance Committee. The Board reviews on a yearly basis whether the governance criteria and economic rationale for existing agreements are still met.



## **Control**

As Atlas Group remains fully responsible for all outsourced functions and activities it needs to include in its risk management systems and controls a process for monitoring and reviewing the quality of the service provided.

The Function Owners as identified within the 'Register of Outsourced Functions' are the persons responsible for overseeing and controlling the outsourced activities in terms of risks and performance. Such persons must monitor and review the service providers on an on-going basis and ensure the functions under their control are performed in accordance with the agreed terms. On a yearly basis, the Function Owners confirm to the Group Chief Risk and Compliance Officer that the terms of the outsourcing agreements are actually being adhered to by the providers of the outsourced functions.

### 3.9 Any other information

The Atlas Group and the PCC follow all requirements of Directive 2009/138/EC (Solvency II Directive) and the Commission Delegated Regulation (EU) 2015/35. All governance structures in place as defined under this section also apply the principle of proportionality related to its business nature, scale and complexity of the risks attaching to its operations.

Furthermore the Group applies all governance procedures to the PCC as a whole, but also to its individual Cells incorporated within the PCC.

## 4. Risk profile

Atlas Group takes and manages risks to achieve its objectives. Risk is accepted as a potential cost of being open for new business, and servicing existing business. The cost of controlling all risks to a “minimal” level could easily outweigh any benefits derived from reducing the cost of risk events. The Group does accept some volatility in operational profit in order to generate profits over the long term.

The risk profile of the Group is defined by the Risk Appetite Statement and approved risk tolerance limits. Risk Appetite is the expression of the level of risk to be pursued (propensity to take risk), the maximum level of risk to be tolerated in pursuit of the Group’s objectives (propensity to exercise control) and the level of risk that is unacceptable, as defined by the Board of Directors and Senior Management. Risk appetite reflects the Group’s willingness to take on risk as derived from its capacity to bear risk and the philosophy and attitude toward risk taking. Atlas’ philosophy, guiding principles and approach to Enterprise Risk Management is described in its Risk Management Policy. Its objectives include achieving target performance and maximising shareholder value, preserving a level of solvency that would support the Group in challenging environments, maintaining adequate liquidity to satisfy obligations as they come due, and protecting all aspects of the Group’s value, including its brand and reputation.

Underlying Atlas Group’s risk appetite are risk tolerances, high-level quantitative measures and qualitative assertions for the maximum risk allowed, set at corporate level and in line with the needs of its stakeholders. At the highest level, they are intended to assure that the undertakings maximise the likelihood of delivering on set missions, strategies and objectives.

To the extent pragmatically possible, the framework is based on quantitative risk measures. Qualitative risk measures are also used as applicable for risks that are difficult and not practical to quantify.

### **COVID-19 Pandemic**

Increased exposures to market, credit and liquidity risks as a result of the pandemic remains a global threat. Investment markets had been hit hard by a global recession as early as end March 2020. The economic outlook remains stressed and continues to create supply chain issues as a result of liquidity constraints.

Countries continue to enter into and out of controlled lockdown situations with an end to abating the pandemic. Albeit that the Group has reported positive results for the year, the impact on business and performance as a result of possible reduced consumption may still potentially impact underwriting risk.

Operational risk tends to increase as a result of the effects of employees working remotely. In early spring 2020, the Group immediately rolled out its BCP. As contemplated in the plan the executive set up a crisis response team headed by the CEO, Matthew von Brockdorff, which will continue to operate during the upcoming year. Its focus has been, and will continue to be, that of ensuring appropriate health and safety measures remain in place, pandemic update communications to the Group’s staff complement, training of staff with a focus on awareness of the pandemic and staff relocation for home remote working arrangements being deployed as and when these were and may be required.

In respect of the cells, the impact of the pandemic on business and performance experiences has been very similar to that of the Group.

## 4.1 Underwriting risk

The Group through its PCC issues contracts that transfer significant insurance risk and that are classified as insurance contracts. As a general guideline, the PCC defines as significant insurance risk the possibility of having to compensate the policyholder if a specified uncertain future event (the insured event) adversely affects the policyholder.

### 4.1.1 Insurance contracts - general business

The results for direct business are determined on an annual basis whereby the incurred cost of claims, commissions and related expenses are charged against the earned proportion of premiums, net of reinsurance, as follows:

- (i) Premiums earned relate to business incepted during the year together with any differences between the booked premiums for prior years and thus previously accrued, less cancellations.
- (ii) Unearned premiums represent the proportion of premiums written in the year that relate to unexpired terms of policies in force at the balance sheet date, calculated on a time apportionment basis.
- (iii) Commissions and other acquisition costs that vary with and are related to securing new contracts and renewing existing contracts are deferred over the period in which the related premiums are earned. These are capitalised and are shown as deferred acquisition costs ("DAC") in the balance sheet. DAC is amortised over the term of the policies as the premium is earned. All other costs are recognised as expenses when incurred.
- (iv) Claims incurred comprise claims and related expenses paid in the year and changes in the provision for outstanding claims, including provisions for claims incurred but not reported ("IBNR") and related expenses, together with any other adjustments to claims from previous years. Where applicable, deductions are made for salvage and other recoveries.
- (v) Provision is made at the year-end for the estimated cost of claims incurred but not settled at the balance sheet date, including the cost of claims incurred but not yet reported to the PCC. The estimated cost of claims includes expenses to be incurred in settling claims and a deduction for the expected value of salvage and other recoveries. The PCC takes all reasonable steps to ensure that it has appropriate information regarding its claims exposures. However, given the uncertainty in establishing claims provisions, it is likely that the final outcome will prove to be different from the original liability established. Liabilities for unpaid claims are estimated using the input of assessments for individual cases reported to the PCC and statistical analyses for the claims incurred but not reported. The PCC does not discount its liabilities for unpaid claims.

The estimation of claims IBNR is generally subject to a greater degree of uncertainty than the estimation of the cost of settling claims already notified to the PCC, where more information about the claim event is generally available.

- (vi) Provision in the form of an unexpired risk provision will be made for any deficiencies arising when unearned premiums, net of associated acquisition costs, are insufficient to meet expected claims and expenses after taking into account future investment return on the investments supporting the unearned premiums provision and unexpired risks provision. The expected claims are calculated having regard to events that have occurred prior to the balance sheet date.

#### 4.1.2 Reinsurance contracts held

Contracts entered into by the PCC with reinsurers under which the PCC is compensated for losses on one or more contracts issued by the PCC and that meet the classification requirements for insurance contracts are classified as reinsurance contracts held. Insurance contracts entered into by the PCC under which the contract holder is another insurer (inwards reinsurance) are included with insurance contracts.

The benefits to which the PCC is entitled under its reinsurance contracts held are recognised as reinsurance assets. These assets consist of short-term balances due from reinsurers (classified within receivables), as well as longer term receivables (classified within reinsurers' share of technical provisions) that are dependent on the expected claims and benefits arising under the related reinsured insurance contracts. Amounts recoverable from or due to reinsurers are measured consistently with the amounts associated with the reinsured insurance contracts and in accordance with the terms of each reinsurance contract. Reinsurance liabilities are primarily premiums payable for reinsurance contracts and are recognised as an expense on an accruals basis.

The PCC assesses its reinsurance assets for impairment on a regular basis. If there is objective evidence that the reinsurance asset is impaired, the PCC reduces the carrying amount of the reinsurance asset to its recoverable amount and recognises that impairment loss in the profit and loss account. The PCC gathers the objective evidence that a reinsurance asset is impaired using the same process adopted for financial assets held at amortised cost. The impairment loss is also calculated following the same method used for these financial assets.

#### 4.1.3 Receivables and payables

Receivables and payables are recognised when due. These include amounts due to and from agents, brokers and policyholders.

If there is objective evidence that an insurance receivable is impaired, the Group reduces the carrying amount of the insurance receivable accordingly and recognises that impairment loss in the profit and loss account. The PCC gathers the objective evidence that an insurance receivable is impaired using the same process adopted for financial assets held at amortised cost. The impairment loss is calculated following the same method used for these financial assets.

#### 4.1.4 Management of insurance risk

The risk under any one insurance contract is the uncertainty of whether the insured will sustain the contingency insured against. If that happens, then further uncertainty lies in how many times this can happen and how much it will cost, i.e. the frequency and severity of resultant claims.

Insurance risk is by its nature random and unpredictable. Consequently the Solo Undertaking writes portfolios of risk with the intention of taking refuge within the theory of probability (large numbers) and thus being able to correctly construct pricing of its insurance contracts.

The risk the PCC faces however remains that actual claims incurred exceed the amounts of such provisions since the frequency and severity incurred exceed the estimated ones.

Insurance events, due to their random nature, can vary in severity and frequency from year to year. However the larger the portfolio involved, the lower the deviation from estimates which is why the PCC endeavours to acquire growth in areas of insurance risk which it deems attractive.

Another method used to mitigate random deviations is that of diversification in portfolio characteristics. Atlas Insurance PCC Limited is not unduly dependant on one class or sector of business and in fact is deemed to be privileged with a balanced mix of various classes of Motor, Liability, Marine, Miscellaneous Accident, Property, Private Medical and Travel and Personal Accident. Furthermore, the PCC's portfolio is spread between personal lines and commercial lines business.

The PCC has a rather even geographical spread of property risks within the Maltese isles and is well spread among the various sectors of commerce e.g. tourism and hotel accommodation; manufacture; services and it is not unduly dependent on one sector alone.

Once again this diversification ensures that the type and amount of risks presented are spread out without there being undue concentrations in one area alone. The benefits of such diversification were manifest in 2020 when the hospitality sector was severely impacted by the pandemic.

During the year the PCC licensed one new cell on the 31<sup>st</sup> December. The Griffin Cell writes professional indemnity risks in Europe. Gemini Cell, L'Amie Cell, Ocado Cell, Amplifon Cell (in run-off) and TVIS Cell carried on business during the year in accordance with their licence conditions.

PerfectHome Cell proceeded with the exercise of being unwound which is expected to be concluded by Q2 in 2021. Yet again the Amplifon Cell and the Ocado Cell did not write new business in 2020.

The pandemic has led to a reduction in the growth of existing cells but generally had a beneficial effect on claims activity.

L'Amie Cell started writing handset insurance in Croatia in late 2020 and remains active in its other markets though the Travel class growth was stunted in 2020.

The other cells are also licensed to write property, accident, sickness, motor, general liability and motor liability and miscellaneous financial risks in the United Kingdom. The property risks are equally well-spread geographically.

#### **Frequency and severity of claims**

##### *Motor and liability*

The danger is that competition restrains average premium growth while the frequency and severity of claims may be seriously affected by:

- (i) the long lifetime which motor and other liability claims tend to have and which can lead to negative effects of inflation on claim amounts;

- (ii) changes in traffic management and density and the increased presence of more vulnerable road users;
- (iii) increased court awards arising from increased sensitivity of courts to the plight of accident victims spurred also by EU directives and “pro-victim” court/legislative tendencies in other EU jurisdictions; and
- (iv) increased responsibilities of employers and business owners in the light of health and safety and consumer legislation; and
- (v) the latent effect of disease claims on the employers liability and products liability portfolio
- (vi) the effect of inflation on motor repair costs
- (vii) the effect of natural hazards affecting comprehensive motor results.

The PCC’s gross motor performance seems to have benefitted from the general reduction in traffic volumes resulting from the pandemic restrictions including home-working and reduced tourist numbers.

The review of Maltese law on civil damages in tort remains un-concluded while legal judgements remain relatively consistent.

#### *Property (including Business Interruption)*

The gross property result sustained the impact of the increase in incurred value of the same large single claim which occurred late in 2019 and a number of other claims. In all cases the effects of the claims were very much mitigated by reinsurance.

#### *Miscellaneous accident*

The nature of claims on Money, Glass, Goods in Transit and Fidelity relate very much to the prevalence of crime in Malta and 2020 showed no extraordinary experience in this respect.

#### *Personal accident and travel*

Travel class was severely impacted by the pandemic both in terms of reduced turnover and cancellation claims.

#### *Marine*

The marine portfolio in 2020 experienced a deterioration in hull results but a satisfactory result overall.

#### *Health*

The health account performed satisfactorily in 2020.

The PCC manages all the above via:

##### *(a) Underwriting strategy*

The PCC follows strict risk acceptance selection processes and only accepts risks that possess characteristics which the PCC feels will lead to low or average frequency and severity of losses. This criteria applies across all classes and for this purpose the PCC uses underwriting guidelines and sets limits on the overall retention of the risks it writes.

The PCC inserts certain exclusions in its contracts to enforce underwriting criteria. For example, in the context of liability exposures, the PCC applies asbestos liabilities exclusions on all liability policies.

The PCC closely scrutinises the business activities of its client base to determine any undue exposure to long-term industrial disease claims and to assist in this process and that of analysing other potential

exposures, the PCC normally views several property, accident and liability risks firsthand via its policy of risk surveying (in-house and external).

The PCC also has a regular renewal analysis and reserves the right to reassess each contract based on its claims experience and any other changes in material information. The majority of the marine cargo account is based on open covers. Thorough controls on each marine open cover are carried out regularly ensuring that performance is acceptable.

Malta's storm and flood exposure is localised in particular areas of flash flood exposure. With the PCC's pre-risk survey strategy and with the added knowledge of flood-prone areas, the PCC filters the incoming new business portfolio or alternatively manages the risk of storm. The PCC is also conscious of the susceptibility of certain locations to windstorm and endeavours to limit shoreline exposures.

The PCC, as a standard, applies limits on all motor and liability policies. The only area of unlimited liability is that of Motor EU use (in line with legislation in certain EU countries). The PCC's internal underwriting authority limits mean that authority to bind is delegated in a controlled manner. The Solo Undertaking's branches likewise follow and are subject to specific underwriting limitations beyond which they must seek head office approval.

The risks underwritten by the PCC may also be in the form of reinsurance contracts issued on a proportional basis whereby it assumes a portion of the risk which the ceding insurance undertakings undertake with their direct clients.

#### (b) Reinsurance

The PCC places its reinsurance programme with overseas reinsurers who all meet the financial approval of the local regulator. It is generally the PCC's policy for reinsurance to be placed in the Lloyd's market or with listed multinational reinsurance companies whose credit rating is not less than A-. The Core's health portfolio is reinsured with AXA PPP healthcare Limited. The portfolio programme is a mix of proportional and non-proportional protection which also includes protection from industrial disease losses incurred but not reported during the years prior to the portfolio transfers in 2004 and 2005 from AXA Insurance plc to the Solo Undertaking.

The PCC's decision on the type of reinsurance obtained, the level of retention and the width of cover are recommended by the PCC's own technical personnel in collaboration with overseas consultants and the board of directors approves the reinsurance programme on an annual basis.

The effectiveness of reinsurance protection in place for the PCC has worked towards reducing the impact of net retained losses for the year by the Solo Undertaking.

#### (c) Claims techniques

Reported claims are handled and reserved on a claim-by-claim basis. The PCC employs in-house specialised claims personnel. In addition to having in place authority levels for its staff to negotiate claims, it also employs a panel of external loss adjusters and technical experts who are regularly utilised in the PCC's quest for sound and equitable claim handling. In the case of cells, the PCC outsources claims handling to specialised third party administrators who, where necessary, may be permitted to sub-outsource certain services e.g. mobile phone repairs.

The PCC has a policy of analysing claims progressions and thus determines if reserving policies adopted in the past have been successful. This procedure has pre-dated the setting up of the PCC as an underwriter.

The PCC actively pursues early settlement of all claims to reduce exposure to unpredictable developments and equally the PCC maintains a proactive system that ensures that timely action is taken on all claims and reviews are carried out when required. This is particularly important in the context of motor and liability claims and in the case of such claims arising from cells, this function is performed by the outsourced specialist administrators and supervised by the relevant cell committee.



In the context of reserving active use is made of a panel of legal advisors and full acquaintance is made with courtroom developments by our specialist claims team supervised by the chief underwriting officer.

#### *Sources of uncertainty in estimation of future claims payments*

Owing to the fact that liability claims are normally payable on a *claims occurrence* basis, a claim is payable if the accident occurred in the year of insurance even if the damage is manifested long afterwards. This is accentuated in the context of employers' liability claims where cover is provided on a *loss caused* basis. Therefore not only can the extent of reported liability claims take longer to be fully known and for such claims to be settled owing also to possible lengthy court proceedings, but, additionally, claims can take long to be even reported. For this reason, claims outstanding provisions for known claims must be adequately increased by provisions for IBNR (incurred but not reported) claims.

Therefore when estimating the cost due to be paid in future the Solo Undertaking looks at:

- (i) the monetary provision necessary for pending non-liability claims based on the latest available facts and estimates
- (ii) the monetary provision for the future payment of claims for bodily injuries to employees or third party victims of accidents. This is based on the accepted basis of:
  - (a) loss of future earnings as a result of disability percentages along with estimated rehabilitation expenses;
  - (b) an element of direct damages; and
  - (c) costs of settlement including legal and other fees and court expenses; and

to the above provisions for known reported claims, the PCC adds the IBNR provision. The PCC also makes a provision for the unexpired period of cover of policies running at the time of the balance sheet date.

Large claims are also assessed on a case-by-case basis, and Atlas takes a prudent approach to determining outstanding reserves based on legal precedent (of particular relevance to motor and liability class) and similar cases. The Solo Undertaking also notes current trends.

The PCC takes care to ensure it is in possession of knowledge on all bodily injury claims notified and carries out active reviews of the larger/more serious bodily injury cases on motor and liability classes.

IBNR reserves are determined using the historical actual development of incurred claims and absolute IBNR levels are then expressed as a proportion of claims outstanding by individual class in order to have an ongoing level of IBNR reserves. Such percentages are reviewed and reassessed annually.

Uncertainty on the estimation of claim payments on property classes is considerably lower than that on motor and liability classes. The same can be said of personal accident, health, travel and miscellaneous accident.

Uncertainty in general is reduced by ensuring thorough knowledge of the circumstances and extent of losses reported; and through the use of medical and loss assessors and adjusters to ensure correct reserving.

A high degree of certainty on marine claims is achieved via collection of survey evidence and value documentation.

## 4.2 Financial risk

**Atlas Group is exposed to financial risk through its financial assets and liabilities, reinsurance assets and insurance liabilities.** The key financial risk is that the proceeds from its financial assets would not be sufficient to fund the obligations arising from its insurance contracts and investing activity. The most important components of the PCC's financial risk are market risk, credit risk and liquidity risk identifying the following areas:

- cash flow and fair value interest rate risk,
- equity price risk;
- currency risk
- credit risk; and
- liquidity risk.

These risks mainly arise on open positions in interest rate, debt and equity products, and currency exposures, which are all subject to market movements.

The Group's financial risk management and investment strategy reflects its profile of liabilities to ensure that sufficient assets of appropriate nature, term and liquidity enable it to meet the liabilities as they become due.

### 4.2.1 Market risk

The Group is exposed to market risk and mitigates exposures by implementing controls for interest rate risk, equity risk, property risk, spread risk and currency risk.

#### **Interest Rate risk**

In general the Group through its PCC is exposed to risk associated with the effects of fluctuations in the prevailing levels of market interest rates. Financial instruments issued at variable rates expose the Atlas to cash flow interest rate risk. Financial instruments issued at fixed rates expose the Group to fair value interest rate risk. The PCC holds investments mostly in equity and debt securities. Debt securities are subject to interest rate risk.

Fair value interest rate risk is the risk that the relative value of a security will worsen due to an interest rate increase. Interest rate risk is mitigated through the distribution of fixed interest investments over a range of maturity dates. Moreover, the Group's asset allocation policy limits the amount of investment in any one asset or towards any one counterparty.

Bank and other borrowing facilities are not commonly availed of and the directors traditionally sanction the use of such facilities for short-term operational cash flow bridging as and when the requirement arises. The exposure to interest rate risk in respect of borrowings is accordingly not material.

Cash at bank subject to floating interest rates expose the Group to cash flow interest rate risk. Such deposits with banks or financial institutions potentially expose the PCC to fair value interest rate risk. However, since these instruments are not fair valued, a change in interest rates will not have an effect on profit or loss or other comprehensive income. Cash at bank subject to floating interest rates expose the Group to cash flow interest rate risk.

The PCC carries out sensitivity analyses for interest rate risk which illustrate how changes in the fair value or future cash flows of a financial instrument will fluctuate because of changes in market interest rates at the reporting date.

At 31 December 2019 the PCC was mainly exposed to fair value interest rate risk on listed fixed interest rate debt securities.

If interest rates at that date would have been 50 basis points (2019: 50 basis points) lower with all other variables held constant, pre-tax profit for the year would have been €289,845 higher (2019: €155,273 higher). An increase of 50 basis points (2019: 50 basis points), with all other variables held constant, would have resulted in pre-tax profits being €60,241 lower. (2019: €201,470 lower). Up to the end of the reporting period the Group did not have any hedging policy with respect to interest rate risk on other financial instruments as exposure to such risks was not deemed to be significant by the directors.

Up to the end of the reporting period the PCC did not have any hedging policy with respect to interest rate risk on other financial instruments as exposure to such risks was not deemed to be significant by the directors.

### **Equity risk**

The Group through its PCC is exposed to market price risk on its equity investments. These investments are subject to stock market volatility and the value can decline significantly in response to adverse political, market or economic developments. The PCC reduces this risk by diversifying its investments in different countries and in different sectors.

The fair value of financial instruments traded in active markets is based on quoted market prices at the balance sheet date. A market is regarded as active if quoted prices are readily and regularly available from an exchange, dealer, broker, industry group, pricing service, or regulatory agency, and those prices represent actual and regularly occurring market transactions on an arm's length basis. The quoted market price used for financial assets held by the PCC is the current bid price. These instruments are included in level 1. At 31 December 2020 and 2019, the carrying amount of the Group's other financial assets and liabilities approximate their fair value in view of their short-term maturity.

The markets affected the portfolio negatively due to Covid-19 at worst experiencing a fair value loss of 9% on the opening balance at the beginning of 2020. By 31 December the portfolio recovered to a fair value loss of just over 1%.

The Group's investment portfolio is overseen by the Investment Committee that meets on a regular basis in order to review the position of its investments and to plan its investment strategy in accordance with established guidelines. Investment decisions are taken on the basis of an Investment Policy approved by the Board. The Investment Policy includes benchmarks and guidelines on various aspects of portfolio management, including currency, instrument, rating, localisation, concentration and maturity. It is periodically reviewed by the Investment Committee and, subject to Board approval, amended as necessary so as to reflect the Group's overall investment objective, which is principally the preservation of capital and liabilities.

The sensitivity for equity price risk illustrates how changes in the fair value of equity securities will fluctuate because of changes in market prices, whether those changes are caused by factors specific to the individual equity issuer, or factors affecting all similar equity traded in the market. The sensitivity for equity price risk is derived based on global equity returns, assuming that currency exposures are hedged. A 10% positive or negative movement in equity prices is considered to be an appropriate benchmark for sensitivity purposes. An increase or a decrease of 10% (2019: 10%) in equity prices, with all other variables held constant, would result in an impact on the Core pre-tax profit for the year of €2,540,368 (2019: €2,451,125). An increase or a decrease of 10% (2019: 10%) in equity prices, with all other variables held constant, would result in an impact on the Cells pre-tax profit for the year of €283,321 (2019: €525,779).

## **Property Risk**

Atlas Group is exposed to property risk through its PCC and this risk only affects the group and core with practically the entire balance sheet values of Tangible Assets – Land, Buildings & Improvements and Investments – Land & Buildings pertaining to the Solo Undertaking.

The PCC's property used in operations and investment property was revalued during 2020 based on professional independent valuations.

The property is valued on periodic valuation by the directors after seeking professional advice from independent professionally qualified valuers who hold a recognised relevant professional qualification and have the necessary experience in the location and segments of the property being valued. When external valuations are carried out in accordance with this policy, the valuer reports directly to the board of directors and discussions on the valuation technique and its results, including an evaluation of the inputs to the valuation, are held between these parties.

At the end of every reporting period during which an external valuation is not carried out, the directors also assess whether any significant changes in actual circumstances and developments have been experienced since the last external valuation. An adjustment to the carrying amount of the property is only reflected if it has been determined that there has been significant change.

Based on the valuation carried out in December 2020 the Directors do not consider that there has been a change since the last valuation position.

## **Currency risk**

Currency risk relates to the risk of fluctuations in the value of financial instruments and assets and liabilities due to changes in exchange rates. The PCC may experience losses arising from a decrease in values of its assets held in foreign currency or an increase in value of its technical reserves denominated in foreign currencies. The board of directors implements a policy of currency matching rules thus minimising the Group's exposure to such risk.

As the Core's net technical reserves arising from its operations are largely denominated in Euro due to the fact that the net contingent value of its policies are written in euro, or naturally hedged in their original currency, the funds covering such liabilities are largely invested in euro instruments.

Similarly, in managing its cells, the PCC applies the same currency matching policy by identifying the currency in which cellular technical provisions arise and as such administers a balance of matched assets with a natural hedge. The standard formula under S II is not sensitive to this "natural hedge" and on that basis, the Cells operating in a currency other than Euro which is the capital denominating cellular incorporation under the Companies Act, requires that a "shock" margin of capital is maintained to mitigate this inexistent risk.

In an effort to maximise return on investment the Board directs its investments committees to prudently apply a certain degree of flexibility which is limited to the extent of not compromising the Group's financial strength in matching its liabilities, primarily its insurance technical provisions.

At 31 December 2020, foreign currency exposure, principally comprising a mix of US Dollar and UK Pound, amounted to €2,139,743 (2019: €1,775,555). If the above currencies had weakened or strengthened by 15% against the euro with all other variables held constant, pre-tax profit for the year would have been lower by €377,602 (2019: €313,333) or higher by €279,097 (2019: €231,594).

#### 4.2.2 Credit risk

Atlas Group is exposed to credit risk, that risk of loss due to a counterparty being unable to pay amounts in full when due. The following are the areas where credit risk is identified:

- (i) reinsurers' share of insurance technical provisions;
- (ii) amounts due from reinsurers in respect of claims already paid;
- (iii) amounts due from insurance contract holders;
- (iv) amounts due from insurance intermediaries; and
- (v) investments and cash and cash equivalents.

Limits of authority and segregation of duties in the granting of credit are in place to maintain objectivity, independence and control over new and existing lending exposures.

The credit risk management team assesses the creditworthiness of all reinsurers, intermediaries and customers by using credit grade references provided by rating agencies, and other publicly available financial information. Where this information is not available, detailed analysis is carried out by investigating both financial strength and market repute. The Group experiences a low level of bad debts and concentration of credit risk with respect to debts is limited due to the large number of customers comprising the Group's debtor base.

Routine reviews of payment history and the status of any ongoing negotiations with counterparties is carried out by the credit risk management in order to detect any deterioration in the creditworthiness of individual counterparties.

In view of the ongoing pandemic the credit risk management team stepped up the frequency of its reviews during 2020 and will do so during 2021.

While reinsurance is used to manage insurance risk, this does not discharge the PCC's liability as primary insurer. If a reinsurer fails to pay a claim for any reason, the PCC remains liable for the payment to the policyholder. The creditworthiness of reinsurers is considered by the directors on an ongoing basis by reviewing their financial strength within the terms of their credit ratings.

Atlas Group is also exposed to credit risk for its investments and its cash at bank. The Group's cash is placed with quality financial institutions. Credit risk in respect of investments is not considered by the directors to be significant in view of the credit standing of the issuers.

The Investment Committee takes account of the credit risk inherent in the PCC's investment portfolio by adopting similar cautious practices in identifying investment opportunities and monitoring portfolio performance. There are certain instances whereby the committee may opt for placing these funds in B-rated and unrated securities only once the circumstances of such an opportunity are fully assessed and are beneficial to the performance of the investment portfolio. These circumstances will only be considered once they fall within the Group's risk appetite and within the investment policy board approved risk parameters.

Credit risk in relation to cells is not considered to be significant when considering payment patterns and/or assessment of counterparties and contractual arrangements.

#### 4.2.3 Liquidity risk

The Atlas Group's exposure to liquidity risk arises from the eventuality that the frequency or severity of claims are greater than estimated. Liquidity risk is the risk that cash may not be available to pay obligations when due at a reasonable cost.

The directors do not consider this risk as significant given the nature of the Group's financial assets and liabilities. The Group's financial assets are considered to be readily realisable as they consist of local and foreign securities listed on recognised stock markets and deposits held with first-class-rated credit institutions. Moreover, the Group ensures that a reasonable level of funds is available at any point in time for unexpected large claims and the Group may also resort to an overdraft facility which provides a short-term means of finance.

### 4.3 Operational risk

Operational risk is the risk of loss resulting from inadequate or failed internal processes, people or systems, or from external events.

Strategic Risk is the risk to the realisation of “goodwill” value of the Group in relation to future new business as well as projects to reduce costs and optimise risk profile. This covers risks:

- leading to actual strategic outcomes differing adversely to expectations;
- which may inhibit strategy and strategic choices; and
- that the strategy chosen is sub-optimal

Previously Atlas considered Strategy Risk as a sub-category of Operational Risk. In the annual review of the risk register during 2020, Strategy Risk has been considered as a separate risk category. Also, as part of enhancing the Risk & Internal Control Frameworks of the Group, a review of the utilised risk classification within the risk register was carried out. To this end, standardized risk classifications were applied to split both Operational and Strategic Risk categories into risk groups, which, in turn, were further opened into risk sub-groupings. The intention of having Atlas-specific operational and strategic risk exposures categorized into standardized risk classifications was to enhance both internal and external risk reporting as well as to facilitate the risk identification and review processes within the ongoing risk management framework.

Strategy risk is split into external factors relating to external threats to strategy and internal factors relating to internal constraints and failings, including project failure. These risk groups are then further split into risk sub-groupings:

- (a) External Strategic Risks;
  - Market Risk Strategic Impacts
  - Macroeconomic Risk
  - Lack of Innovation
- (b) Internal Strategic Risks;
  - Reputation Risk
  - Product Risk
  - Service Risk
  - Project Risk
  - Lack of Innovation

Operational risk is split into (a) Internal Fraud, (b) External Fraud, (c) Employment Practices and Workplace Safety, (d) Clients, Products & Business Practices, (e) Damage to Physical Assets, (f) Business Disruption and System Failures, (g) Execution, Delivery & Process Management, (h) Compliance – Legal and Regulatory Risk. Each of the above risk groups, are then split further into risk sub-groupings:

- (a) Internal Fraud;
  - Unauthorised Activity
  - Theft and Fraud
- (b) External Fraud;
  - Theft and Fraud
  - Cyber Security
- (c) Employment Practices and Workplace Safety
  - Employee Relations

- Health and Safety
- Diversity and Discrimination
- (d) Clients, Products & Business Practices
  - Suitability, Disclosure & Fiduciary
  - Improper Business or Market Practices
  - Product Flaws
  - Selection, Sponsorship & Exposure
  - Advisory Activities & Mis-selling
- (e) Damage to Physical Assets
- (f) Business Disruption and System Failures
- (g) Execution, Delivery & Process Management
  - Customer Intake and Documentation
  - Transaction Capture, Execution & Maintenance
  - Customer/Client Account Management
  - Monitoring and Reporting
  - Trade Counterparties
  - Vendors & Suppliers
- (h) Compliance – Legal and Regulatory Risk
  - Authorisation
  - Company Law
  - Complaints handling
  - Conduct (Marketing, Distribution, POG)
  - Data Protection
  - Distribution
  - Employment
  - Fees
  - Governance
  - Health and Safety
  - Marketing
  - Outsourcing
  - Passporting
  - Reporting
  - Regulatory
  - Tax

Operational Risk can be challenging to quantify. EIOPA recognises this and the standard formula in effect assesses Operational Risk as a function of premium and technical provisions and therefore is not particularly risk sensitive. For the purposes of determining the operational risk charge under the Economic Capital Requirement, Atlas bases the assessment on the Risk Register. The approach that Atlas adopts is to determine worst case costs for each of the risk categories defined above, through reference of own experience of operational risk events and/or the application of expert judgement on possible loss scenarios.



### **Cellular Solvency Capital Deficit Risk**

In line with EU regulations, EIOPA guidelines on ring fenced funds and MFSA's Guidance Note on solvency requirements in relation to PCCs, other than for cells with a non-recourse provision, cells would be allowed to be in deficit on capital requirements so long as there are sufficient unrestricted surplus funds in the PCC Core and in the Group to meet such cellular deficits.

Regulations correctly do not allow for consideration of any surplus funds in cells when calculating the solvency position of the PCC as a whole, since such funds can only be used in respect of the specific cell to which the funds appertain. Regulations also do not allow for any diversification benefits to accrue between the Cells and the Core.

## 4.5 Any other information

Atlas Group diversifies its operations with an end to minimise risks that may threaten the financial stability of the Group and its stakeholders.

Mitigation of risk ranks highly in priority in all the various Board of Directors business within the Group as evidenced throughout this report. The key highlights for mitigating the risks identified are:

- A diversified and balanced insurance risk portfolio;
- Diversification in its operations taking opportunity of the leading regulatory positioning of Malta as a primary financial services provider within the European Union;
- Prudent application of risk management techniques and risk mitigation policies;
- Absolute prudence applied through its investment policy and strategy for its asset base;
- Investment in its human resources for their personal development through both external and in-house training of staff;
- The reserving of capital that goes beyond the regulatory driven requirement. This financial strategy is further enhanced through the Group's detailed ORSA which reviews and promotes the use of "economic capital" in matching all risks.

Both reporting processes for the Group under insurance regulation and financial requirements set under the Group's Act are complete. All insurance technical contingent liabilities are recognised under the Solo Undertakings reporting of technical provisions and more than adequately reserved as reported in the Balance Sheets reproduced in this report. Furthermore all other contingent liabilities are disclosed in the PCC's and the Atlas Group financial statements for the year under review as evidenced by the external auditor report attaching to the respective financial statements.

## 5. Valuation of assets and liabilities for solvency purposes

The financial statements of Atlas Group are prepared in accordance with International Financial Reporting Standards (IFRS) as adopted by the EU and in accordance with the requirements of the Companies Act (Cap. 386). They also consider the requirements of the Insurance Business Act, (Cap. 403) in consolidating the results of Atlas Insurance PCC Limited where appropriate. As such they are prepared under the historical cost convention as modified by the fair valuation of Investment property, Land and buildings – property, plant and equipment, and financial assets are recognised at fair value through profit or loss.

Assets and liabilities under Solvency II are valued in accordance with the SII Directive and the Commission Delegated Regulation 2015/35Act. Article 75 of Directive 2009/138/EC requires an economic, market-consistent approach to the valuation of assets and liabilities. According to the risk-based approach of Solvency II, when valuing balance sheet items on an economic basis, undertakings need to consider the risks that arise from a particular balance sheet item, using assumptions that market participants would use in valuing the asset or the liability.

The Group is required to report on such valuations for both the Atlas Group and the Solo Undertaking, Atlas Insurance PCC Limited.

### **COVID-19 Pandemic**

As stated in the previous section, the Group's investment asset portfolio may still be significantly impacted as a result of the ongoing threat of global recession due to COVID-19. Atlas Group has in the past carried out stress and scenario testing on its PCC's investments and assessed the impact this will have on its financial projections. When considering stress and scenario testing carried out as part of the Group's ORSA (Own Risk Solvency Assessment) process on its market and capital positions, the directors consider that Atlas Group is able to withstand potential longer term adverse impact on its assets. Whilst as at 31 March 2020, the Group had registered a 9% diminution in the value of its financial assets, these assets recovered well by year end 2020.

At year end the PCC's investment properties were professionally valued. This was done using a combination of techniques applying the discounted cashflows approach and the capitalisation approach. This confirmed that the value of the properties held on the balance sheet at year end do not materially differ from the professional valuation and is in line with the valuation outputs.

The Group continues to monitor underlying insurance operations by line of business, including the potential for reduced premium or increased claims exposure for certain lines of business at the same time. Atlas considers that its reinsurance strategy and the current high grade quality of its reinsurance panel protects the PCC from material exposure for such risk. The downgrading of reinsurers cannot be excluded for the pandemic.

Up and until March 2021 the Group's operations report results substantially in excess of budget expectations. The Group's financial assets have held opening values for the year with negligible diminutions registered which are offset by realised income.

The Directors' assessment has primarily focused on the Core's business.

## 5.1 Assets

The Atlas Group total Assets are represented in the below table showing IFRS values which have been adjusted for Solvency II purposes.

Atlas Group in Euro '000		2020		2019
Assets	IFRS	Solvency II Adjustment	Solvency II value	Solvency II value
Deferred acquisition costs	920	-920	0	0
Intangible assets	659	-659	0	0
Property, plant & equipment held for own use	8,391	0	8,391	8,660
Investments (other than assets held for index-linked and unit-linked)				
Property (other than for own use)	10,499	0	10,499	11,221
Holdings in related undertakings, including participations	1,649	0	1,649	1,516
Equities				
Equities - listed	4,261	6,101	10,362	9,696
Equities - unlisted	0	1,940	1,940	3,094
Bonds				
Government Bonds	408	1,436	1,844	3,610
Corporate Bonds	7,645	11,846	19,491	16,866
Collective Investments Undertakings	21,205	-21,205	0	0
Deposits other than cash equivalents	269	-1	269	370
Loans and mortgages				
Other loans and mortgages	740	0	740	778
Reinsurance recoverables from:				
Non-life and health similar to non-life				
Non-life excluding health	22,927	-7,215	15,712	15,292
Health similar to non-life	2	3,149	3,151	2,978
Insurance and intermediaries receivables	4,203	-1,599	2,603	2,693
Reinsurance receivables	54	0	54	0
Receivables (trade, not insurance)	2,201	-118	2,083	1,853
Cash and cash equivalents	7,700	0	7,700	4,315
<b>Total assets</b>	<b>93,733</b>	<b>-7,244</b>	<b>86,489</b>	<b>82,943</b>

You will note that adjustments are carried to IFRS values in arriving at Solvency II Balance Sheet values. The following are the explanations for the movements arising therefrom which result in a reduction in total assets held for the Group of €7.24 million (€7.83 million for 2019).

Atlas Group in Euro '000		2020		2019
Deferred acquisition costs and intangible assets	IFRS	Solvency II Adjustment	Solvency II value	Solvency II value
Deferred acquisition costs	920	-920	0	0
Intangible assets	659	-659	0	0
	<b>1,579</b>	<b>-1,579</b>	<b>0</b>	<b>0</b>

Deferred acquisition costs, which are recognised under IFRS as being a cost carried forward in the Balance Sheet for the future earning of premium, have been removed in total from the asset base as these are considered in arriving at the best estimate valuations for technical provisions. As such the asset does not carry any value within the Solvency II asset base of the Core and its Cells.

For the Solvency II balance sheet the intangible asset values recognised under IFRS are also removed. The IFRS assets are recognised for goodwill (value for business acquired which is impaired in accordance with IFRS) and computer software (depreciated in accordance with IFRS rules). The Group does not hold any goodwill assets as on the reporting period. This regulation also requires that any intangible asset other than goodwill must carry a value equal to its resale value. The Atlas Group does not consider any resale value for its computer software.

Atlas Group in Euro '000		2020		2019
Fixed income securities	IFRS	Solvency II Adjustment	Solvency II value	Solvency II value
Bonds				
Government Bonds	408	1,436	1,844	3,610
Corporate Bonds	7,645	11,846	19,491	16,866
Collective Investments Undertakings	21,205	-21,205	0	0
	29,258	-7,923	21,335	20,476

Fixed income securities are reported in the IFRS balance sheet at fair value to profit and loss. For the purpose of Solvency II balance sheet valuation accrued income has been added to such fair value. This, together with the “look through” procedure to identify bonds within funds, accounts for the increase in Solvency II balance sheet values.

The exposures to fixed income securities reported for the Atlas Group are equal to those reported for the PCC. The incorporated cells within the PCC do not carry any such exposures.

Collective investment undertakings (funds) are reported in the IFRS balance sheet at fair value to profit and loss. Solvency II regulations allow for a “look through” procedure where the funds’ securities are identified and reclassified according to their nature and valued accordingly. This mainly accounts for the adjustments to equities and bonds in the table above.

Atlas Group in Euro '000		2020		2019
Reinsurance recoverables	IFRS	Solvency II Adjustment	Solvency II value	Solvency II value
Reinsurance recoverables from:				
Non-life and health similar to non-life				
Non-life excluding health	22,927	-7,215	15,712	15,292
Health similar to non-life	2	3,149	3,151	2,978
	22,929	-4,065	18,863	18,271

### Reinsurance Recoverables

According to the PCC’s Reinsurance Policy, all reinsurers require a minimum S&P credit rating of A- (or equivalent) other than for specific risks locally placed with Maltese authorised reinsurance companies. This is consistent with the Risk Appetite which has an appetite of A and a floor of A-. Lower or unrated reinsurers may be used if agreed by both the Chief Underwriting Officer and Chief Executive Officer provided the board is notified at the next available board meeting.

All of the reinsurers treaties comply with the above requirement, with an accordingly approved BBB reinsurer covering a single cell’s insurance portfolio.

Reinsurance recoverables from such reinsurers have a direct relationship with the gross technical provisions shown in the liabilities section of the balance sheet and arise as a direct consequence of the valuations of such technical provisions reserved in the balance sheet. As such the reduction in recoverables for Solvency II valuations follows the modelling of “Best Estimate” calculations carried out on the gross technical provisions in accordance with the different reinsurance treaties in place. Please see notes under subsection 5.2.1.

Atlas Group in Euro '000		2020		2019
Insurance receivables and other trade receivables	IFRS	Solvency II Adjustment	Solvency II value	Solvency II value
Insurance and intermediaries receivables	4,203	-1,599	2,603	2,693
Receivables (trade, not insurance)	2,201	-118	2,083	1,853
	6,404	-1,717	4,687	4,546

Atlas Group operates its insurance underwriting either on a direct line of business with negotiation carried out with its policy holders on a direct basis or through a network of intermediaries. This gives rise to timing differences for the collection of premium. Any balances that are not yet due are considered to be future cash flows under the Solvency II balance sheet and therefore reclassified to technical provisions in the calculation of “best estimate” values for such provisions. IFRS valuation

considers the amounts receivable at amortised cost less any provision for doubtful debts. The adjustment to technical provisions is shown in the above table.

Receivables which are not classified as insurance receivables include accrued income and prepayments under IFRS valuations. For the purpose of Solvency II valuation the amount of accrued income arising from interest to be earned on fixed income securities is reclassified to the fair value for such securities.

As stated earlier, the Group will also report on the Solo Undertaking's results and for this purpose below you will find tables showing the Core's IFRS Balance Sheet movements to Solvency II Balance Sheet values. These are reproduced as an extract from the Solo Undertaking's Solvency and Financial Condition Report.

PCC Core in Euro '000		2020		2019
Assets	IFRS	Solvency II Adjustment	Solvency II value	Solvency II value
Deferred acquisition costs	1,812	-1,812	0	0
Intangible assets	535	-535	0	0
Property, plant & equipment held for own use	8,391	0	8,391	8,641
Investments (other than assets held for index-linked and unit-Property (other than for own use)	10,499	0	10,499	11,221
Holdings in related undertakings, including participations	1,127	0	1,127	1,127
Equities				
Equities - listed	4,261	6,090	10,351	9,689
Equities - unlisted	0	1,931	1,931	2,635
Bonds				
Government Bonds	408	1,435	1,844	3,609
Corporate Bonds	7,609	11,804	19,413	17,233
Collective Investments Undertakings	21,142	-21,142	0	0
Deposits other than cash equivalents	269	1	269	371
Loans and mortgages				
Other loans and mortgages	740	0	740	778
Reinsurance recoverables from:				
Non-life and health similar to non-life				
Non-life excluding health	22,927	-7,215	15,712	15,292
Health similar to non-life	2	3,149	3,151	2,978
Insurance and intermediaries receivables	4,203	-1,600	2,603	2,693
Re-Insurance receivables	54	0	54	0
Receivables (trade, not insurance)	1,454	-117	1,336	570
Cash and cash equivalents	6,114	0	6,114	3,108
<b>Total assets</b>	<b>91,548</b>	<b>-8,012</b>	<b>83,536</b>	<b>79,945</b>

For Deferred Tax Assets please see note under subsection 5.2.2 "Deferred Tax Liabilities".

## 5.2 Total liabilities

The Atlas Group total liabilities are represented in the below table showing IFRS values which have been adjusted for Solvency II purposes.

Atlas Group in Euro '000		2020		2019
Liabilities	IFRS	Solvency II Adjustment	Solvency II value	Solvency II value
Technical provisions – non-life				
Technical provisions – non-life (excluding health)	43,377	-43,377	0	0
Best Estimate	0	30,769	30,769	30,367
Risk margin	0	799	799	797
Technical provisions - health (similar to non-life)	379	-379	0	0
Best Estimate	0	5,101	5,101	4,299
Risk margin	0	67	67	44
Deferred tax liabilities	2,143	137	2,281	2,991
Debts owed to credit institutions	0	0	0	344
Insurance & intermediaries payables	974	-437	536	877
Reinsurance payables	588	-178	410	206
Payables (trade, not insurance)	6,579	0	6,579	6,756
<b>Total liabilities</b>	<b>54,041</b>	<b>-7,499</b>	<b>46,542</b>	<b>46,681</b>

The following Liabilities Tables represents the aggregated total liabilities for the PCC as a whole and its individual components as an extract from the PCC's Solvency and Financial Condition Report.

PCC Core in Euro '000		2020		2019
Liabilities	IFRS	Solvency II Adjustment	Solvency II value	Solvency II value
Technical provisions – non-life				
Technical provisions – non-life (excluding health)	43,377	-43,377	0	0
Best Estimate	0	30,769	30,769	30,367
Risk margin	0	789	789	785
Technical provisions - health (similar to non-life)	379	-379	0	0
Best Estimate	0	5,101	5,101	4,299
Risk margin	0	66	66	43
Deferred tax liabilities	1,958	-128	1,831	2,551
Debts owed to credit institutions	0	0	0	344
Insurance & intermediaries payables	974	-438	536	877
Reinsurance payables	588	-178	410	206
Payables (trade, not insurance)	5,617	0	5,617	5,481
<b>Total liabilities</b>	<b>52,894</b>	<b>-7,775</b>	<b>45,119</b>	<b>44,952</b>

### 5.2.1 Technical provisions

Technical provisions as reported under IFRS are revalued under Solvency II requirements. The best estimate technical provisions comprise of the claims provision and premium provision.

The claims provision is the discounted best estimate of cash flows relating to past claim events that occurred before the valuation date, whether reported or not. The cash flows include: future cash flows resulting from past claims events (including salvage and subrogation) and cash flows arising from allocated and unallocated expenses in respect of past claims events.

The premium provision is the discounted best estimate of cash flows relating to future claim events that have not yet occurred, but that are covered by existing and legally binding pre-inception contracts.

There is a limitation upon the accuracy of best estimates in that there is an inherent uncertainty in the estimates of loss amounts that underlie the calculations. This arises as the ultimate liability for claims is subject to the outcome of events yet to occur, including changes in the attitudes of courts and claimants towards the settlement of claims. In applying expert judgement, we have employed techniques and assumptions that are appropriate, given the information currently available. It should be recognised that future loss emergence is likely to deviate from our estimates. Uncertainty is likely to increase in cases where there is limited historical data. Moreover, the ongoing pandemic creates additional uncertainty due to possible changes in exposure and claims profile. Management recognises the presence of uncertainty and carry out careful monitoring to address this on a routine basis. In this regard, assumptions are continuously reviewed and updated as new information becomes available. Therefore management remains confident that any emergence of uncertainty is addressed immediately.

The following is a description of each step of the change in technical provisions:

A description of each step of the change in technical provisions as reported in the above tables is as follows:

#### **Claims Provision adjustment**

- a) Best estimate of claims reserves have been calculated using standard actuarial techniques including: Paid & incurred Chain Ladder or Link Ratio Method, Bornhuetter Ferguson Method and Bootstrap Method.
- b) Future allocated expenses are implicitly allowed for in the technical provisions. An explicit allowance has been made for unallocated loss adjustment expenses which include projected investment management expenses, administration expenses and other overhead expenses.
- c) An explicit allowance has been made for Events Not in Data (ENIDs).

#### **Premium Provision**

- a) Cash flows resulting from future claims events have been estimated by applying assumed loss ratios to year-end unearned premium reserves. The loss ratio assumption is based on historic loss ratio experience arising from the claims provision analysis.
- b) An allowance for ENIDs is included in the claims cash flows.
- c) Expenses associated with servicing of in force policies has been made.
- d) Future premium cash flows have been included.

#### **Discounting**

Both claims and premium provisions cash flows were modelled using payment patterns derived from historic experience. These were discounted by the year end 2020 yield curves as published by EIOPA.



## Risk Margin

The risk margin was calculated by approximating the future SCRs to be projected in line with the projected cashflows of the best estimate technical provisions. This was then discounted using the year end 2020 yield curve and a 6% cost of capital was applied.

## Reinsurers' share of SII Technical Provisions (Section 5.1 – Reinsurance recoverables)

This was calculated based on the gross less net best estimate liabilities, where the net claims liabilities have been derived based on netting down ratios (for example net to gross premiums / paid or incurred claims) and allowance for an additional reinsurance cash flows. An allowance for the reinsurers default has been included.

## Valuation principles

The Technical Provisions have been calculated as the sum of a best estimate plus a risk margin in accordance with the Solvency II Directive and associated texts.

## Segmentation

The technical provision analysis is performed based on the following line of business segmentation:

Motor vehicle liability insurance ("MTPL"), Other motor insurance, Fire and other damage to property insurance ("Fire"), General liability insurance, Income protection insurance, Marine, aviation and Transport, Miscellaneous financial loss and Medical expenses.

## Contract boundaries

Under Solvency II, undertakings shall only recognise the obligations within the boundary of the contract. A contract boundary is defined as where the insurance or reinsurance undertaking has at a future date:

- A unilateral right to terminate the contract or a part of it;
- A unilateral right to reject premiums payable under the contract; or
- A unilateral right to amend the premiums or the benefits payable under the contract such that the premiums of the portfolio fully reflect the risk.

The assumption here is that the policy renewal date is the contract boundary since the PCC has the ability to re-price policies at each renewal date.

The following Technical Provisions extracted from the total liabilities tables highlight the Balance Sheet component movements of the Group explained above.

Atlas Group in Euro '000		2020		2019
Technical provisions	IFRS	Solvency II Adjustment	Solvency II value	Solvency II value
Technical provisions – non-life				
Technical provisions – non-life (excluding health)	43,377	-43,377	0	0
Best Estimate	0	30,769	30,769	30,367
Risk margin	0	799	799	797
Technical provisions - health (similar to non-life)	379	-379	0	0
Best Estimate	0	5,101	5,101	4,299
Risk margin	0	67	67	44
	43,756	-7,020	36,736	35,506

In line with the requirements for Group Solvency II Balance Sheet value movements put forward above, below you will find tables attaching to the Core.

PCC Core in Euro '000			2020		2019
Technical provisions	IFRS		Solvency II Adjustment	Solvency II value	Solvency II value
Technical provisions – non-life					
Technical provisions – non-life (excluding health)	43,377	▼	-43,377	0	0
Best Estimate	0	▼	30,769	30,769	30,367
Risk margin	0	▼	789	789	785
Technical provisions - health (similar to non-life)	379	▼	-379	0	0
Best Estimate	0	▼	5,101	5,101	4,299
Risk margin	0		66	66	43
	43,756		-7,031	36,725	35,494

Below we are reproducing the Quantitative Reporting Templates (QRT) as required under regulation for the Group and the PCC's Aggregate.

**QRT Table 4 – PCC Aggregated Core and Cells in Euro '000**

S.17.01.02

Non-life Technical Provisions

		Direct business and accepted proportional reinsurance							Total Non-Life obligation	
		Medical expense insurance	Income protection insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance		Miscellaneous financial loss
		C0020	C0030	C0050	C0060	C0070	C0080	C0090		C0130
Technical provisions calculated as a whole	R0010									
Technical provisions calculated as a sum of BE and RM										
Best estimate										
Premium provisions										
Gross	R0060	3,353	14	1,653	1,594	152	-879	332	-36	6,183
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140	2,092	-2	-32	-36	87	-1,223	29	-93	823
Net Best Estimate of Premium Provisions	R0150	1,261	16	1,685	1,631	65	344	302	57	5,360
Claims provisions										
Gross	R0160	1,577	157	7,606	314	253	12,370	4,481	3,952	30,711
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240	1,062	0	632	15	121	9,499	807	3,568	15,703
Net Best Estimate of Claims Provisions	R0250	516	157	6,974	299	132	2,870	3,675	385	15,008
Total Best estimate - gross	R0260	4,930	171	9,258	1,908	406	11,491	4,813	3,917	36,894
Total Best estimate - net	R0270	1,777	173	8,659	1,930	197	3,214	3,977	442	20,368
Risk margin	R0280	59	8	464	79	7	365	205	160	1,347
Amount of the transitional on Technical Provisions										
Technical Provisions calculated as a whole	R0290									
Best estimate	R0300									
Risk margin	R0310									
Technical provisions - total										
Technical provisions - total	R0320	4,989	178	9,722	1,987	413	11,856	5,018	4,077	38,241
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	R0330	3,154	-2	600	-22	209	8,276	836	3,475	16,526
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	R0340	1,836	180	9,123	2,008	204	3,579	4,182	602	21,715

**QRT Table 5 – PCC Aggregated Core and Cells in Euro '000**

S.19.01.21

**Non-life Insurance Claims Information**

**Total Non-Life Business**

Accident year / Underwriting year	<b>Z0020</b>	Accident year [AY]
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**Gross Claims Paid (non-cumulative)**

(absolute amount)

	Year	Development year										In Current year	Sum of years (cumulative)		
		1	2	3	4	5	6	7	8	9	10 & +				
Prior	R0100	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0170	C0180	
2011	R0160	305	139	27	13	-3	1	0	2		0		-24	-24	
2012	R0170	357	213	36	-5	1	3	0	0	0			0	484	
2013	R0180	203	112	25	5	0	0	1	-6				-6	606	
2014	R0190	231	191	15	0	-1	0	0					0	339	
2015	R0200	513	4	50	-7	0	0						0	436	
2016	R0210	214	229	40	1	-6							-6	560	
2017	R0220	626	182	13	14								14	477	
2018	R0230	821	318	6									6	834	
2019	R0240	4,691	1,064										1,064	1,145	
2020	R0250	6,471											6,471	5,754	
Total												R0260	7,518	6,471	17,082

**Gross undiscounted Best Estimate Claims Provisions**

(absolute amount)

												Year end (discounted data)		
Year	Development year													
	C0200	1 C0210	2 C0220	3 C0230	4 C0240	5 C0250	6 C0260	7 C0270	8 C0280	9 C0290	10 & + C0300			
Prior	R0100											17	R0100	14
2011	R0160	256	76	34	3	2	1	2	0	0	0		R0160	0
2012	R0170	464	126	44	22	17	14	14	14	2			R0170	2
2013	R0180	191	86	48	27	29	26	21	19				R0180	18
2014	R0190	525	92	14	11	8	0	0					R0190	0
2015	R0200	230	125	49	43	32	7						R0200	6
2016	R0210	384	107	32	17	1							R0210	0
2017	R0220	419	165	35	15								R0220	13
2018	R0230	541	81	62									R0230	51
2019	R0240	290	111										R0240	101
2020	R0250	265											R0250	1,783
Total													R0260	1,988

## 5.2.2 Other liabilities

Section 5.2 above provides the reporting for the Atlas Group's and the Core's total liabilities. The following section reports on the movements for other liabilities. Liabilities arising from technical provisions have been reported on under Section 5.2.1 of this report.

Atlas Group in Euro '000				
Other liabilities	IFRS	2020 Solvency II Adjustment	Solvency II value	2019 Solvency II value
Deferred tax liabilities	2,143	137	2,281	2,991
Insurance & intermediaries payables	974	-437	536	877
Reinsurance payables	588	-178	411	207
Payables (trade, not insurance)	6,579	0	6,580	6,756
<b>Total liabilities</b>	<b>10,285</b>	<b>-479</b>	<b>9,808</b>	<b>10,832</b>

### Deferred tax liabilities

Atlas Group recognises deferred tax liabilities under IFRS using the liability method, on temporary differences arising between the tax bases of assets and liabilities and their carrying amounts in the financial statements. However, deferred tax liabilities are not recognised if they arise from the initial recognition of goodwill; deferred tax is not accounted for if it arises from initial recognition of an asset or liability in a transaction other than a business combination that at the time of the transaction affects neither accounting nor taxable profit or loss. Deferred tax is determined using tax rates (and laws) that have been enacted or substantially enacted by the balance sheet date and are expected to apply when the related deferred tax asset is realised or the deferred tax liability is settled.

The transition of IFRS balance sheet values to those of Solvency II as reported do cause balance sheet movements adjusting the net asset value reported in both the Group's Solvency II balance sheet and that of the PCC. Such movement gives rise to the recognition of a deferred tax asset/liability adjustment for such movements in the Solvency II Balance Sheet.

### Insurance and intermediaries, and reinsurance payables

Insurance and intermediaries payables and reinsurance payables Solvency II are considered to be future cash flows and therefore reclassified to technical provisions in the calculation of "best estimate" values for such provisions. IFRS valuation considers fair value for the amounts receivable.

The following tables report on the PCC components arriving at the PCC's aggregate Other Liabilities.

PCC Core in Euro '000				
Other liabilities	IFRS	2020 Solvency II Adjustment	Solvency II value	2019 Solvency II value
Deferred tax liabilities	1,958	-128	1,831	2,551
Insurance & intermediaries payables	974	-439	536	877
Reinsurance payables	588	-178	410	206
Payables (trade, not insurance)	5,617	0	5,617	5,481
	<b>9,138</b>	<b>-744</b>	<b>8,394</b>	<b>9,115</b>

## 5.3 Alternative methods for valuation

The Atlas Group or the PCC does not use any alternative methods for the calculation of the arising liabilities.

Below we are reproducing the Quantitative Reporting Templates (QRT) as required under regulation.

**QRT Table 6 – Atlas Group in Euro '000**

### G.02.01.02

#### Balance sheet

##### Assets

Property, plant & equipment held for own use
Investments (other than assets held for index-linked and unit-linked contracts)
Property (other than for own use)
Holdings in related undertakings, including participations
Equities
Equities - listed
Equities - unlisted
Bonds
Government Bonds
Corporate Bonds
Deposits other than cash equivalents
Loans and mortgages
Other loans and mortgages
Reinsurance recoverables from:
Non-life and health similar to non-life
Non-life excluding health
Health similar to non-life
Insurance and intermediaries receivables
Reinsurance receivables
Receivables (trade, not insurance)
Cash and cash equivalents
<b>Total assets</b>

##### Liabilities

Technical provisions – non-life
Technical provisions – non-life (excluding health)
Best Estimate
Risk margin
Technical provisions - health (similar to non-life)
Best Estimate
Risk margin
Deferred tax liabilities
Debts owed to credit institutions
Insurance & intermediaries payables
Reinsurance payables
Payables (trade, not insurance)
<b>Total liabilities</b>
<b>Excess of assets over liabilities</b>

	Solvency II value
	C0010
<b>R0060</b>	8,391
<b>R0070</b>	46,054
<b>R0080</b>	10,499
<b>R0090</b>	1,649
<b>R0100</b>	12,302
<b>R0110</b>	10,362
<b>R0120</b>	1,940
<b>R0130</b>	21,335
<b>R0140</b>	1,844
<b>R0150</b>	19,491
<b>R0200</b>	269
<b>R0230</b>	740
<b>R0260</b>	740
<b>R0270</b>	18,863
<b>R0280</b>	18,863
<b>R0290</b>	15,712
<b>R0300</b>	3,151
<b>R0360</b>	2,603
<b>R0370</b>	54
<b>R0380</b>	2,083
<b>R0410</b>	7,700
<b>R0500</b>	86,489
	Solvency II value
	C0010
<b>R0510</b>	36,736
<b>R0520</b>	31,567
<b>R0540</b>	30,769
<b>R0550</b>	799
<b>R0560</b>	5,168
<b>R0580</b>	5,101
<b>R0590</b>	67
<b>R0780</b>	2,281
<b>R0800</b>	0
<b>R0820</b>	536
<b>R0830</b>	410
<b>R0840</b>	6,579
<b>R0900</b>	46,542
<b>R1000</b>	39,947

**QRT Table 7 – PCC Aggregated Core and Cells in Euro '000**

**S.02.01.02**

**Balance sheet**

**Assets**

Deferred tax assets
Property, plant & equipment held for own use
Investments (other than assets held for index-linked and unit-linked contracts)
Property (other than for own use)
Holdings in related undertakings, including participations
Equities
Equities - listed
Equities - unlisted
Bonds
Government Bonds
Corporate Bonds
Collective Investments Undertakings
Deposits other than cash equivalents
Loans and mortgages
Other loans and mortgages
Reinsurance recoverables from:
Non-life and health similar to non-life
Non-life excluding health
Health similar to non-life
Deposits to cedants
Insurance and intermediaries receivables
Reinsurance receivables
Receivables (trade, not insurance)
Cash and cash equivalents

**Total assets**

**Liabilities**

Technical provisions – non-life
Technical provisions – non-life (excluding health)
Best Estimate
Risk margin
Technical provisions - health (similar to non-life)
Best Estimate
Risk margin
Deferred tax liabilities
Insurance & intermediaries payables
Reinsurance payables
Payables (trade, not insurance)

**Total liabilities**

**Excess of assets over liabilities**

	Solvency II value
	C0010
<b>R0040</b>	38
<b>R0060</b>	8,391
<b>R0070</b>	48,277
<b>R0080</b>	10,499
<b>R0090</b>	1,127
<b>R0100</b>	12,282
<b>R0110</b>	10,351
<b>R0120</b>	1,931
<b>R0130</b>	21,257
<b>R0140</b>	1,844
<b>R0150</b>	19,413
<b>R0180</b>	2,833
<b>R0200</b>	279
<b>R0230</b>	740
<b>R0260</b>	740
<b>R0270</b>	16,526
<b>R0280</b>	16,526
<b>R0290</b>	13,374
<b>R0300</b>	3,152
<b>R0350</b>	125
<b>R0360</b>	6,682
<b>R0370</b>	54
<b>R0380</b>	4,874
<b>R0410</b>	21,003
<b>R0500</b>	106,709
	Solvency II value
	C0010
<b>R0510</b>	38,241
<b>R0520</b>	33,073
<b>R0540</b>	31,793
<b>R0550</b>	1,280
<b>R0560</b>	5,168
<b>R0580</b>	5,101
<b>R0590</b>	67
<b>R0780</b>	2,591
<b>R0820</b>	1,836
<b>R0830</b>	2,490
<b>R0840</b>	6,937
<b>R0900</b>	52,094
<b>R1000</b>	54,615

## 6. Capital management

The value of own funds reduces under Solvency II valuations due to the changes in values for assets and liabilities. The differences between the financial statements balance sheet and the solvency II balance sheet have been reported under Section 5 of this report.

In order to maintain or adjust the capital structure when required, the Group may issue new shares or capitalise contributions received from its shareholders. The PCC applies the same policy for its cellular shareholders.

The Group and PCC are required to hold regulatory capital for its general insurance business in compliance with the rules issued by the MFSA. The minimum capital requirement must be maintained at all times throughout the year. The Group monitors its capital level, and that of the cells, on a regular basis at least once a month through detailed reports compiled from management accounts. Such reports are circulated to the Boards and senior management. Any transactions that may potentially affect the Group's or the PCC's solvency position are immediately reported to the directors for resolution prior to notifying the MFSA.

### **Covid-19 Pandemic**

As part of its annual ORSA exercise, Atlas Group continues to test resilience of its capital adequacy under various stress scenarios. The most significant impact of COVID-19 on own funds continues to be likely on the asset side as a result of the impact on investment assets. On the other hand, the impact on the SCR is not likely to be significant, as previous calculations of the SCR for stressed projections have shown offsetting results for reduced business volumes and reduced asset exposures. This means that the main driver impacting the solvency cover is the possible reduction in own funds mentioned earlier and above.

With a cover of 280% resulting in surplus eligible own funds of €24 million over the SCR for the Group, the Board of Directors considers that the Group is sufficiently capitalised to withstand the risk of diminution of values for its investment portfolio, and still retain an adequate solvency cover, and on this basis does not consider the going concern basis to be uncertain. Atlas Group is committed to monitor its capital adequacy positions on an ongoing basis. At the same time, the Directors acknowledge that the global and local economic environment remain uncertain.

As stated under section 2 the Board of Directors will continue to be vigilant for the developing pandemic and any potential negative impact this may have on the Group's operations. The Board is committed to managing the Group's finances during 2021 as it has during the year under review.



## 6.1 Own Funds

A major component of the Own Funds of the Atlas Group and the PCC is that of Tier 1 Capital, which include:

- a) **Paid-in Ordinary Share Capital** of the highest quality Own Funds which can be relied on to absorb losses on a going-concern basis. Such shares are issued directly by Atlas Holdings Limited and the PCC with the prior approval of its shareholder and, where applicable, of the Atlas Core and cell shareholders, and ultimately the approval of the MFSA.
- b) **Reconciliation Reserve** which is the resultant variance in Own Funds between the Solvency II and the IFRS Balance Sheet with an allowance for Deferred Tax Assets/ Liability movements is also to be factored in the Group's and the PCC's (where applicable) Own Funds total as Tier 1 Capital.
- c) **Other Reserves** which include reserves in equity being the resultant movement in property revaluation under IFRS as per the Group's Audited Annual Financial Statements.
- d) **Retained Earnings** which include accumulated profit reserves after the payment of dividends as confirmed through the Group's and the PCC's Audited Annual Financial Statements.
- e) **Functional Currency Exchange Reserve** which is the resulting difference between functional and reporting currencies arising from the cellular operations. Such reserve is also audited on an annual basis by the external auditors.

As per the Commission Delegated Regulation 2015/35 on Solvency II, the Atlas Group's boards may consider in future the use of Share Premium accounts and Capital Contributions as a form of Own Funds eligible as Tier 1 Capital. It may also make recommendations to the Atlas Holdings Limited Board to accept such capital instruments. Under regulation the PCC is obliged to seek regulatory approval for such instruments.

Another component of the Own Funds of the Group and the PCC is that of ancillary own funds qualifying as Tier 2 Capital. Preferred instruments by the Group are in the form of unpaid ordinary share capital. Under special circumstances the Group's Board will also consider Letters of Credit. It is the responsibility of the Board to review and ensure the substance and ultimate financial strength underlying the capital instruments which qualify as ancillary own funds under Tier 2 capital.

The total own funds for the Atlas Group in matching the Solvency Capital Requirement as on 31 December 2020 is equal to €37.65 million (2019: €36.26 million). The Group does not consider any ancillary own funds.

Under Solvency II regulation certain components for equity recognised under IFRS are reclassified to a reconciliation reserve, which reserve also accounts for the movements carried out to the net asset value in the Solvency II balance sheet. Such movement is considered to be an unrealised gain/loss in valuation and on that basis recognises this movement net of deferred taxation. Clearly this is a dynamic component for Own Funds in that the value is the product of Balance Sheet Net Asset Value movements from IFRS reporting that of Solvency II.

All the Group and PCC's Core own funds are classified under Solvency II as Tier 1 capital since they are considered to be of high quality.

The Own Funds applied in matching the Solvency Capital Requirements are detailed in the below table for the Group.

Atlas Group in Euro '000		2020		2019
Own funds	IFRS	Solvency II Adjustment	Solvency II value	Solvency II value
Paid up ordinary shares	5,325	0	5,325	5,325
Revaluation reserves	5,069	-5,069	0	0
Other reserves	-614	614	0	0
Retained earnings	30,071	-30,071	0	0
Non-controlling interests in equity	-160	160	0	0
Adjustment for restricted own funds	0	0	0	0
Reconciliation reserve	0	32,322	32,322	30,938
	39,691	-2,044	37,647	36,263

During the year under review, the directors of the Company declared the payment of an interim dividend of €1,000,000 net of tax.

The PCC is the main driver for dividend income receivable by the Company. In following the European Systemic Risk Board and MFSA guidance for the preservation of capital during the pandemic in 2020, and in applying prudence, the PCC's Board of Directors did not propose the payment of further dividends to the shareholder during the year and for that reason the Company's Board followed suit in its positioning on dividend distribution.

A communication from the MFSA received by the local insurance market in December 2020 gives guidance that, in moving forward, the MFSA continues to recommend that insurance undertakings apply due prudence in preserving their capital reserves but that it would consider applications for the payment of dividends on a case by case basis.

In view of this and the positive results achieved by the Group during 2020, on 16 February 2021 a net interim dividend of €1,300,000 was paid to the shareholder. The directors propose the payment of a final dividend of €1,000,000 to the shareholder of the Company.

#### **Application and review of own funds.**

It is also the responsibility of the Board of Directors of the PCC to monitor on a continuous basis the adequacy of Eligible Own funds according to the medium-term capital management plan and it is its responsibility to ensure before issuance of any own fund items that it can satisfy the criteria for the appropriate tier on a continuous basis, where this is applicable.

The Group Chief Financial Officer liaises with the Company Secretary, where applicable, to support backing calculations showing the effect of any proposed increase in paid/unpaid share capital for Atlas Holdings Limited, the Core or the Cells on the own funds for approval by the respective Boards of the Atlas Group.

This procedure is to be also followed by the Group Chief Financial Officer in the event that any Regulatory Solvency shortfalls are identified to be matched by financial instruments other than capital instruments. An example of this would be bankers' guarantees issued by shareholders.

#### **Medium-Term Capital Management Plan**

The Group adopts a medium term capital management plan which is consistently reflected in other risk management policies and procedures set by the Board.

This plan considers the various disciplines and parameters which govern the underlying asset exposures to the Group Companies' balance sheets and incorporated cells within the PCC. Priority is given to the loss absorbency aspects of these assets. They are driven by:

- The Group's policy on Risk Management and the risk register arising therefrom;
- The Group's Investment Policy; and
- The Group's Asset Liability Management Policy and set investment parameters arising therefrom which include consideration for:

- Counterparty default risk;
- Currency risk;
- Market risk;
- Liquidity risk;
- Concentration risk

Below we are reproducing the Quantitative Reporting Templates (QRT) as required under regulation for the Group and the PCC's Aggregate.

**QRT Table 8 – Atlas Group in Euro '000**

**G.23.01.22**

**Own funds**

**Basic own funds before deduction for participations in other financial sector**

Ordinary share capital (gross of own shares)

Reconciliation reserve

**Total basic own funds after deductions**

**Own funds when using the D&A, exclusively or in combination of method 1**

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 )

Total available own funds to meet the minimum consolidated group SCR

Total eligible own funds to meet the consolidated group SCR (excluding own funds from other financial sector and from the undertakings included via D&A )

Total-eligible own funds to meet the minimum consolidated group SCR

**Minimum consolidated Group SCR**

**Ratio of Eligible own funds to Minimum Consolidated Group SCR**

**Total eligible own funds to meet the group SCR (including own funds from other financial sector and from the undertakings included via D&A )**

**Group SCR**

**Ratio of Eligible own funds to group SCR including other financial sectors and the undertakings included via D&A**

**Reconciliation reserve**

Excess of assets over liabilities

Forseeable dividends, distributions and charges

Other basic own fund items

**Reconciliation reserve before deduction for participations in other financial sector**

	<b>Total</b>	<b>Tier 1 - unrestricted</b>
	<b>C0010</b>	<b>C0020</b>
<b>R0010</b>	5,325	5,325
<b>R0130</b>	32,322	32,322
<b>R0290</b>	37,647	37,647
<b>R0520</b>	37,647	37,647
<b>R0530</b>	37,647	37,647
<b>R0560</b>	37,647	37,647
<b>R0570</b>	37,647	37,647
<b>R0610</b>	3,700	
<b>R0650</b>	1017.50%	
<b>R0660</b>	37,647	37,647
<b>R0680</b>	13,422	
<b>R0690</b>	280.50%	
	<b>C0060</b>	
<b>R0700</b>	39,947	
<b>R0720</b>	2,300	
<b>R0730</b>	5,325	
<b>R0760</b>	32,322	

**QRT Table 9 – PCC Aggregated Core and Cells in Euro '000**

**S.23.01.01**

**Own funds**

**Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation (EU) 2015/35**

Ordinary share capital (gross of own shares)

Reconciliation reserve

Other own fund items approved by the supervisory authority as basic own funds not specified above

**Total basic own funds after deductions**

**Ancillary own funds**

Unpaid and uncalled ordinary share capital callable on demand

**Total ancillary own funds**

**Available and eligible own funds**

Total available own funds to meet the SCR

Total available own funds to meet the MCR

Total eligible own funds to meet the SCR

Total eligible own funds to meet the MCR

**SCR**

**MCR**

**Ratio of Eligible own funds to SCR**

**Ratio of Eligible own funds to MCR**

**Reconciliation reserve**

Excess of assets over liabilities

Foreseeable dividends, distributions and charges

Other basic own fund items

Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds

**Reconciliation reserve**

	Total	Tier 1 - unrestricted	Tier 2
	C0010	C0020	C0040
<b>R0010</b>	24,313	24,313	
<b>R0130</b>	19,775	19,775	
<b>R0180</b>	500	500	
<b>R0290</b>	44,588	44,588	
<b>R0300</b>	1,844		1,844
<b>R0400</b>	1,844		1,844
<b>R0500</b>	46,432	44,588	1,844
<b>R0510</b>	44,588	44,588	
<b>R0540</b>	45,368	44,588	780
<b>R0550</b>	44,588	44,588	
<b>R0580</b>	22,154		
<b>R0600</b>	5,538		
<b>R0620</b>	204.79%		
<b>R0640</b>	805.07%		

	C0060
<b>R0700</b>	54,615
<b>R0720</b>	2,350
<b>R0730</b>	24,813
<b>R0740</b>	7,677
<b>R0760</b>	19,775

## 6.2 SCR & LACDT Allowance, and MCR

Atlas Group does not make use of internal models, partial internal models or undertaking specific parameters in calculating its solvency capital requirement (SCR). The PCC calculates its respective nSCR's and ultimate aggregated SCR utilising the standard formula.

Individual cells are not obliged to hold the absolute minimum capital requirement (AMCR of €3.70 million) as this is an obligation imposed on the PCC's Core, nor is an individual cell obliged under regulation to match its own nSCR with its own funds for as long as that Cell has financial recourse to the Core's own funds. Under the Companies Act (Cell Companies Carrying on Business of Insurance) Regulations, the PCC may impose non-recourse for cells authorised to carry on Captive insurance business and/or Reinsurance business. Under such circumstances these cells would have to match their own nSCR with its own funds. The PCC has the Amplifon Cell which is authorised to carry on the business of reinsurance where non-recourse is in place and on that basis matches its own funds to its nSCR with a solvency ratio of 227%.

The following table illustrates in Euro '000 the various risk components making up the SCR requirements for both the Group and the PCC.

### 2020

Solvency Capital Requirement	Group Euro '000	Core Euro '000	Amplifon Euro '000	Other Cells Euro '000	Aggregate Euro '000
Market risk	11,618	11,505	51	2,125	13,681
Counterparty default risk	3,934	3,597	71	4,840	8,509
Health underwriting risk	1,061	1,061	0	0	1,061
Non-life underwriting risk	5,616	5,616	269	3,578	9,463
Operational risk	1,240	(5,680)	(63)	(1,771)	(7,514)
Diversification	(5,830)	1,240	26	765	2,031
LACDT	(4,218)	(4,137)	0	(940)	(5,077)
<b>Total SCR</b>	<b>13,422</b>	<b>13,202</b>	<b>354</b>	<b>8,597</b>	<b>22,154</b>

### 2019

Solvency Capital Requirement	Group Euro '000	Core Euro '000	Amplifon Euro '000	Other Cells Euro '000	Aggregate Euro '000
Market risk	11,416	11,148	126	2,227	13,500
Counterparty default risk	3,033	2,841	308	5,006	8,155
Health underwriting risk	709	709	0	0	710
Non-life underwriting risk	5,547	5,547	884	3,688	10,119
Operational risk	1,228	1,228	72	754	2,055
Diversification	(5,158)	(5,044)	(205)	(1,880)	(7,128)
LACDT	(4,977)	(4,404)	0	(867)	(5,271)
<b>Total SCR</b>	<b>11,799</b>	<b>12,026</b>	<b>1,185</b>	<b>8,928</b>	<b>22,140</b>

Supervised Groups and Authorised insurance undertakings are required to also report on the minimum capital requirement (MCR) which is required to be matched at all times by own funds. This regulation allows exception for cells incorporated within a PCC as this is covered by the PCC as a whole.

The Minimum Consolidated Group Solvency Capital Requirement for the Atlas Group is the result of the Solo's Minimum Capital Requirement (MCR) calculation for its Core. The regulations apply the principle of an Absolute Minimum Capital Requirement (AMCR) which is currently set at €3.70 million. The Group would be required to hold sufficient own funds in excess of the Core's MCR or AMCR whichever is the highest. As such the Group's Minimum Consolidated Group Solvency Capital Requirement for 2020 is being reported at €5.54 million.

In both cases the own funds reported for Solvency II comfortably exceed the above MCR requirements.

#### **Assessment of the Loss Absorbing Capacity of Deferred Tax (LACDT) adjustment**

New requirements around the LACDT adjustment took effect from 1 January 2020, although these were already considered by Atlas Group as at YE2019 assessment of capital requirements. These new requirements include the need to consider the impact that the current notional loss would have on future pricing, profitability and uncertainty.

Following scenario tests to determine profit recoverability following various severe scenarios, the extent that can be recovered from deferred tax assets from separate 1 in 200 year losses in insurance, market or counterparty risk (i.e. from the respective capital charges) is estimated. This is applied to both solvency and economic capital requirements.

The Group's assessment for the allowance of LACDT recoverability is limited for insurance risk (non-life U/W and health U/W) charge to 20%, resulting in a 7% tax charge. Additionally, the LACDT recoverability has also been limited for the other risk categories to 80%, implying a 28% tax charge:

	Group
Market Risk	28%
Counterparty Risk	28%
Non-Life Insurance Risk	7%
Health NSLT	7%
Operational	28%

Over and above the recoverability limitation applied above, another layer of prudence is applied by limiting the future profitability over the 3-year business planning period under a stressed scenario. In this case, the amount that could be recovered is limited to the tax payable on 50% of future base profits in year 1 and 75% of future base profits in year 2. The recoverability period is also limited to 3 future years, in line with the business planning period.

The minimum resulting LACDT adjustment between the two approaches described above is chosen. The amount of LACDT adjustment allowed for in the assessment of the regulatory SCR for the Group for the 2020 valuation year is detailed below:

## 2020

<b>Loss Absorbing Capacity of Technical Provision and Deferred Tax</b>	<b>-€4,217,754</b>		
<b>Losses predicted by SCR Model which can be recovered from future profits</b>	<b>-€4,217,754</b>	<b>Risk Charge</b>	<b>Applicable tax rate</b>
Market Risk	<b>-€3,253,106</b>	<b>€11,618,237</b>	28%
Counterparty Risk	<b>-€1,101,572</b>	€3,934,185	28%
Non-Life Insurance Risk	<b>-€393,145</b>	€5,616,358	7%
Health NSLT	<b>-€74,249</b>	€1,060,705	7%
Diversification (Market, Counterparty, Insurance)	€951,386		
Operational Risk	<b>-€347,067</b>	€1,239,527	28%
<b>LACDT Cappings:</b>			
35% x (BSCR+Op)	<b>-€6,173,771</b>		
35% x 3 Year Proj Profits Before Tax Net of Inv Income / 3 x 3 (3 yr)	<b>-€5,906,948</b>		
35% x 3 Year Proj Profits Before Tax Net of Inv Income - limited profitability: 50% yr 1, 75% yr 2, 100% yr 3	<b>-€4,496,937</b>		

The maximum allowable LACDT in relation to the calculated BSCR and operational risk charge amounts to €6.2m. When this is assessed against the projected future profitability over the 3-year business planning period, the amount is capped at €5.9m. This is further limited by considering the future profitability under a stressed position in the first and second projected years, resulting in an allowance of €4.5m. Finally, this is compared to the limitation on the tax charge as described above, resulting in the LACDT adjustment of €4.2m.

Authorised insurance undertakings are required to also report on the minimum capital requirement (MCR) which is required to be matched at all times by own funds.

Below we are reproducing the Quantitative Reporting Templates (QRT) as required under regulation.



**QRT Table 10 – Atlas Group in Euro '000**

**G.25.01.22**

**Solvency Capital Requirement - for groups on Standard Formula**

		<b>Gross solvency capital requirement</b>
		<b>C0110</b>
Market risk	<b>R0010</b>	11,618
Counterparty default risk	<b>R0020</b>	3,934
Health underwriting risk	<b>R0040</b>	1,061
Non-life underwriting risk	<b>R0050</b>	5,616
Diversification	<b>R0060</b>	-5,830
<b>Basic Solvency Capital Requirement</b>	<b>R0100</b>	16,400
<b>Calculation of Solvency Capital Requirement</b>		<b>C0100</b>
Operational risk	<b>R0130</b>	1,240
Loss-absorbing capacity of deferred taxes	<b>R0150</b>	-4,218
<b>Solvency capital requirement excluding capital add-on</b>	<b>R0200</b>	13,422
<b>Solvency capital requirement</b>	<b>R0220</b>	13,422
<b>Other information on SCR</b>		
Minimum consolidated group solvency capital requirement	<b>R0470</b>	3,700
<b>Solvency capital requirement</b>	<b>R0570</b>	13,422

**QRT Table 11 – PCC Aggregated Core and Cells in Euro '000**

**S.25.01.21**

**Solvency Capital Requirement - for undertakings on Standard Formula**

		<b>Gross solvency capital requirement</b>
		<b>C0110</b>
Market risk	<b>R0010</b>	14,498
Counterparty default risk	<b>R0020</b>	9,017
Health underwriting risk	<b>R0040</b>	1,124
Non-life underwriting risk	<b>R0050</b>	10,028
Diversification	<b>R0060</b>	-9,468
<b>Basic Solvency Capital Requirement</b>	<b>R0100</b>	25,200
		<b>C0100</b>
<b>Calculation of Solvency Capital Requirement</b>		
Operational risk	<b>R0130</b>	2,031
Loss-absorbing capacity of deferred taxes	<b>R0150</b>	-5,077
<b>Solvency capital requirement excluding capital add-on</b>	<b>R0200</b>	22,154
<b>Solvency capital requirement</b>	<b>R0220</b>	22,154
<b>Other information on SCR</b>		
Total amount of Notional Solvency Capital Requirement for remaining part	<b>R0410</b>	13,202
Total amount of Notional Solvency Capital Requirements for ring fenced funds	<b>R0420</b>	8,951
		Yes/No
		<b>C0109</b>
<b>Approach to tax rate</b>		
Approach based on average tax rate	<b>R0590</b>	2 - No
		LAC DT
		<b>C0130</b>
<b>Calculation of loss absorbing capacity of deferred taxes</b>		
LAC DT	<b>R0640</b>	-5,077
LAC DT justified by reversion of deferred tax liabilities	<b>R0650</b>	-349
LAC DT justified by carry back, future years	<b>R0680</b>	-4,728

**QRT Table 12 – PCC Aggregated Core and Cells in Euro '000**

**S.28.01.01**

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

**Linear formula component for non-life insurance and reinsurance obligations**

		<b>C0010</b>		
MCR <sub>NL</sub> Result	<b>R0010</b>	4,267		
			Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
			<b>C0020</b>	<b>C0030</b>
Medical expense insurance and proportional reinsurance	<b>R0020</b>	1,777	2,884	
Income protection insurance and proportional reinsurance	<b>R0030</b>	173	595	
Motor vehicle liability insurance and proportional reinsurance	<b>R0050</b>	8,659	5,509	
Other motor insurance and proportional reinsurance	<b>R0060</b>	1,930	6,971	
Marine, aviation and transport insurance and proportional reinsurance	<b>R0070</b>	197	607	
Fire and other damage to property insurance and proportional reinsurance	<b>R0080</b>	3,214	10,470	
General liability insurance and proportional reinsurance	<b>R0090</b>	3,977	2,817	
Assistance and proportional reinsurance	<b>R0120</b>	0	0	
Miscellaneous financial loss insurance and proportional reinsurance	<b>R0130</b>	442		
<b>Overall MCR calculation</b>				
		<b>C0070</b>		
Linear MCR	<b>R0300</b>	4,267		
SCR	<b>R0310</b>	22,154		
MCR cap	<b>R0320</b>	9,969		
MCR floor	<b>R0330</b>	5,538		
Combined MCR	<b>R0340</b>	5,538		
Absolute floor of the MCR	<b>R0350</b>	3,700		
		<b>C0070</b>		
<b>Minimum Capital Requirement</b>	<b>R0400</b>	5,538		

### 6.3 Use of the duration-based equity risk sub-module in the calculation of Solvency Capital Requirement

Both the Atlas Group and the PCC did not use the duration-based equity risk sub module set out in Article 304 of the Directive for the calculation of its Solvency Capital Requirement.

#### 6.4 Differences between the Standard Model and any Internal Model used

Both the Atlas Group and the PCC do not make use of the possibility allowed under the Solvency II Directive to apply internal or partial internal models and on this basis have nothing to report.

## 6.5 Non-compliance with the Minimum Capital Requirement and non-compliance with the Solvency Capital Requirement

As on 31 December 2020 the Group reports a Solvency Ratio of 280% for Solvency II Own Funds over the Solvency Capital Requirement. As such there is no non-compliance issue to report.

## 6.6 Any other information

As noted throughout the report the Atlas Group reports its results for all its subsidiaries and the PCC under regulation.

Below we are reproducing the Quantitative Reporting Templates (QRT) as required under regulation.

**QRT Table 13 – Atlas Group**

G.32.01.22

Undertakings in the scope of the group

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	Criteria of influence					Inclusion in the scope of consolidation	Group solvency calculation
								% capital share	% used for the establishment of consolidated accounts	% voting rights	Level of influence	Proportional share used for group solvency calculation	YES/NO	Method used and under method 1, treatment of the undertaking
C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0180	C0190	C0200	C0220	C0230	C0240	C0260
MT	5299009OC7HGHKVM2254	LEI	Atlas Holdings Limited	5	Limited liability company	2	MFSA						1	1
MT	529900F52D5B51ONO136	LEI	Atlas Insurance PCC Limited	2	Limited liability company	2	MFSA	100.00%	1	100.00%	1	100.00%	1	1
MT	529900ETP4ZUO613S537	LEI	AISH Limited	99	Limited liability company	2	MFSA	75.00%	1	75.00%	1	75.00%	1	1
MT	529900N7YYVZLTVTZ734	LEI	Jesmond Mizzi Financial Advisors Limited	99	Limited liability company	2	MFSA	37.50%		37.50%	2	37.50%	1	1
MT	529900FSDRG7F53V7G49	LEI	SRS Management Europe PCC Limited	99	Limited liability company	2	MFSA	17.50%	1	17.50%	1	17.50%	1	1
MT	529900QZNMH0YY2B9Z44	LEI	Atlas Healthcare Insurance Agency Limited	99	Limited liability company	2	MFSA	100.00%	1	100.00%	1	100.00%	1	1
MT	C35771	SC	Stuart Property Development Limited	99	Limited liability company	2	MFSA	25.00%		25.00%	1	25.00%	1	1
MT	C28074	SC	Assikura Insurance Brokers PCC Limited	99	Limited liability company	2	MFSA	40.00%	0	40.00%	1	40.00%	1	1
MT	C104	SC	Eagle Star (Malta) Limited	99	Limited liability company	2	MFSA	100.00%	1	100.00%	1	100.00%	1	1
MT	C94404	SC	IVALIFE Insurance Limited	99	Limited liability company	2	MFSA	25.00%	0	25.00%	2	25.00%	1	1

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