

Allianz Risk Transfer (Bermuda) Limited

# Financial Condition Report

Year ended December 31, 2019

Allianz 

## **FINANCIAL CONDITION REPORT**

### **for ALLIANZ RISK TRANSFER (BERMUDA) LIMITED**

Allianz Risk Transfer (Bermuda) Limited ('ART Bermuda' or the 'Company') is a core part of Allianz Risk Transfer ('ART'), the centre of competence for alternative risk transfer business within the Allianz Group. Our strategy is to provide tailored insurance, reinsurance and other non-traditional risk management solutions to corporate and financial clients worldwide.

The Company's core business segments are comprised of the following:

#### **Capital Solutions**

Capital Solutions is a Global Line of Business of Allianz Global Corporate & Specialty ('AGCS'). Its purpose is twofold: 1) to act as a high margin profit generating unit for activities performed on behalf of third party investor clients and 2) to act as an enabler of the expansion of AGCS' (and Allianz Group's) underwriting appetite in partnership with investor clients.

The business activities of the AGCS Capital Solution group are aligned along the following three core distinct but mutually reinforcing activities:

- 1) Insurance Management
  - Portfolio Management Activities
- 2) Balance Sheet Services for Investors
  - Fronting
  - Financial Leverage
  - Loss Development/Collateral release structures
  - Clearing
- 3) Structuring and Strategic Investments for Allianz
  - Managing Strategic Facilities; Climate Interface with Capital Markets
  - Creating capacity structures with ILS Investors for expansion of Allianz group appetite
  - Innovating with new forms of risk to meet investor appetite (life, casualty, cyber)
  - Identifying and vetting strategic investment opportunities for Allianz in the ILS space

## **ART Line of Business**

Our product range includes traditional coverage, such as quota shares and multi-line aggregate excess coverage, as well as customized structures specifically designed to meet the risk transfer requirements of an individual client. The Company also seeks opportunities in dislocated areas of the market where capacity is in short supply.

Our corporate clients include leading companies in the energy, construction, pharmaceutical and apparel industries. We specialize in building customized multiyear and multi-line agreements covering a broad range of risks, leveraging both our own expertise in alternative risk transfer and the global capabilities of the Allianz Group. The Company helps corporations manage clients' complex risks over the long term, using a blend of creative risk transfer techniques and traditional insurance to fill gaps in risk management programs of its clients. We also offer captive fronting solutions which require working with sophisticated corporate partners to develop (re)insurance programs that aggregate and consolidate risk (multi-line programs) into the clients' captives.

Allianz Risk Transfer Line of Business ("LOB") underwriters also help clients protect against weather effects negatively impacting financial performance or interrupting or delaying business operations. The protection is tailored to the client's needs and can be structured in insurance or financial product form depending upon the regulatory requirements in the relevant jurisdiction. The weather business is global and deals with companies in any industry sector which is exposed to temperature, rain, snow or wind risks. These risks are P&C in nature but are usually contracted in non-insurance (derivative) form.

The Company is the center of competence within the Allianz Group for weather risk solutions. Our dedicated team of weather risk experts has created weather insurance products and derivatives since 2008. Our tailored solutions include coverage of wind chill, temperature and rainfall as well as weather-related indices such as ground freeze and crop yield.

The range of solutions provided by the Company can cover a wide range of lines of business as the underwriting team is focused on solutions rather than specific product lines. As a result, the Company writes business including, but not necessarily limited to, the following business lines:

- Property (including Property Cat)
- Liability
- Marine, Aviation and Transport
- Motor (all risks)
- Credit and Surety
- Miscellaneous Financial Loss

## Business and Performance

The Company's insurance business written by business segment and by geographical region for the year ended December 31, 2019 was as follows (all figures in this section sourced from the 2019 BSCR):

	<u>Gross Premium Written</u>	<u>Net Premium Written</u>
<b>Line of Business</b>		
Property Catastrophe	\$ 351,484,580	\$ -
Property	161,418,963	63,119,372
Credit / Surety	21,079,151	910,138
Credit / Surety Non-Proportional	5,200,039	5,200,039
Energy Offshore / Marine	22,534,967	-
US Casualty	67,521,170	2,016,511
International Casualty Non-Motor	<u>131,441,433</u>	<u>-</u>
<b>Total</b>	<b>\$ <u>760,680,303</u></b>	<b>\$ <u>71,246,060</u></b>

	<u>Net Premium Written</u>
<b>Geographical Location</b>	
Caribbean and Central America	\$ 22,376,716
North-East United States	6,208,693
South-East United States	353,338
Mid-West United States	41,646,185
Western United States	<u>661,128</u>
<b>Total</b>	<b>\$ <u>71,246,060</u></b>

The Company's insurance business written by business segment and by geographical region for the year ended December 31, 2018 was as follows (all figures in this section sourced from the 2018 BSCR):

	<u>Gross Premium Written</u>	<u>Net Premium Written</u>
<b>Line of Business</b>		
Property Catastrophe	\$ 421,489,668	\$ -
Property	111,341,516	17,573,241
Property Non-Proportional	617,512	617,512
Credit / Surety	30,280,459	929,230
Credit / Surety Non-Proportional	1,617,980	1,617,980
US Casualty	146,369,803	4,937,891
International Motor – Non-Proportional	<u>2,134,993</u>	<u>2,134,993</u>
<b>Total</b>	<b>\$ <u>713,851,931</u></b>	<b>\$ <u>27,810,847</u></b>

	<u>Net Premium Written</u>
<b>Geographical Location</b>	
Oceania	\$ 173,740
Northern Europe	2,412,618
Western Europe	(116,000)
North America (Excluding USA)	1,807,386
North-East United States	3,753,661
South-East United States	1,239,188
Mid-West United States	17,137,929
Western United States	<u>1,402,325</u>
<b>Total</b>	<b>\$ <u>27,810,847</u></b>

The Company's investment performance by asset class for 2019 was as follows:

PIMCO Total Return Bond Fund	8.96%
Unquoted Equities	0.00%
Catastrophe Bonds – USD	2.91%

The Company's investment performance by asset class for 2018 was as follows:

PIMCO Total Return Bond Fund	(1.06)%
Unquoted Equities	0.00%
Catastrophe Bonds – USD	3.72%

## Contacts and Structure

### Insurance Supervisor:

Name: Bermuda Monetary Authority

Jurisdiction: Bermuda

Email Address: insuranceinfo@bma.bm

Phone Number: 441-295-5278

### Group Supervisor

Organization: Federal Financial Supervisory Authority (“BaFin”)

Jurisdiction: Germany

Email address: www.bafin.de

### Approved Auditor

Organisation: PricewaterhouseCoopers

Name: Marisa Savage

Jurisdiction: Bermuda

Email address: marisa.savage@bm.pwc.com

Phone Number: 441-295-2000

### Corporate Secretary

Organisation: Walkers Corporate (Bermuda) Limited

Name: Heather Kitson

Jurisdiction: Bermuda

Email Address: heather.kitson@walkersglobal.com

Phone Number: 441-242-1519

### Ownership details:

Owner Name: Allianz Global Risks US Insurance Company.

Owner Percentage: 100%

Group organisation chart is attached at Schedule A

## **Governance Structure**

### **Board and Senior Executive**

The Board of Allianz Risk Transfer (Bermuda) Limited consists of five [4] Directors. Names, roles and responsibilities for the Directors and Officers are as follows:

***Thomas Schatzmann***                      ***Director***

Thomas joined Allianz Risk Transfer AG at its formation in 1997. After ten years of service as global Head of Accounting, Thomas became Chief Financial Officer with responsibility for Allianz Risk Transfer AG and subsidiaries in April 2007, serving on the executive board of management since that time. In January 2019, he was appointed to the board of directors of Allianz Risk Transfer (Bermuda) Limited. Thomas started his career with a professional apprenticeship at Winterthur Insurance, Switzerland in 1982 and has worked for more than thirty-five years in various roles within the insurance industry, primarily in an international environment.

***Douglas Randy Renn***                      ***Director***

Randy Renn has been the Chief Financial Officer, Allianz Global Corporate & Specialty (AGCS) North America and a member of the company's Board of Directors since 2007. Randy is responsible for all financial functions for North America, including reporting, financial planning, treasury, actuarial, and risk management. As a Six Sigma certified financial executive, Randy has led significant restructuring and business process reengineering initiatives at Allianz, GE Capital, Citi Group, and CNA Insurance.

Randy holds a Master's degree in Finance and Business Administration from the University of Illinois.

***Michael Zipper***                              ***Director***

Michael Zipper, in addition to being a Director of the Company for almost 15 years, is General Counsel for the business segments of Allianz that are written by the Company which has given Michael a broad view of the Company's operations. Since 2000 when Michael joined Allianz Group, he has engaged in and managed the alternative risk transfer legal and compliance team responsible for global transactional work at Allianz, as well as having been responsible for North American (which includes Bermuda) corporate and regulatory legal affairs. Prior to that, Michael held a variety of positions in the commercial insurance and reinsurance industry, including Senior Counsel at Capital Re Corporation and corporate and regulatory counsel for Travelers Insurance.



Michael went to law school in New York City at the Benjamin N. Cardozo School of law and attended college at the University of Michigan.

***Richard Morris***                      ***Director (resigned May 15, 2020)***

Richard Morris joined Allianz Risk Transfer as Chief Financial Officer, North America in 2008 and has global responsibility for the technical and financial accounting and reporting for all Line of Business transactions. Based in Bermuda, he also has served as Director and Principal Representative for Allianz Risk Transfer (Bermuda) Limited since 2008. Prior to Allianz Risk Transfer (Bermuda) Limited, Mr. Morris was Senior Vice President and Financial Controller of XL Financial Solutions.

Richard, a British Overseas Territory Citizen, is a Fellow of the Institute of Chartered Accountants in England and Wales (FCA), having qualified in 1992.

***David Brown***                              ***Director and President (effective May 26, 2020)***

David Brown joined Allianz Risk Transfer (Bermuda) Limited in 2010 and is currently responsible for the Insurance Linked Markets business team. David works with managers of third party capital to access (re)insurance risk. With over 15 years of industry experience, including both underwriting and brokering, David joined from Allianz Risk Transfer (UK) Limited. His early career was spent at Marsh, where he focused on structuring alternative risk transfer and captive solutions.

David is an Associate of the Chartered Insurance Institute and holds a Master's degree in Mathematical Trading and Finance from Cass Business School.

All Directors and Officers are Allianz employees and receive no specific additional fees for their services to the Board. As Allianz employees, they are subject to Allianz guidelines covering performance review and an element of overall remuneration is performance-based. There are no supplementary or early retirement schemes in place nor are there any material transactions with the board or senior executive.

## **Remuneration Policy**

The Company's remuneration program is in line with AGCS guidelines adapted to the specific requirements of the Bermuda market. It includes fixed annual base salary, competitive employee benefits and annual cash bonuses and (for senior management) long-term equity awards based on Group and individual performance.

The compensation program is designed to provide a balanced mix of salary, annual incentive compensation, and long-term incentive compensation, the realisation of which depends upon the attainment of a range of performance metrics.

Employees' performance is formally assessed at least twice a year and is graded against a target bonus based on a mix of financial and personal KPIs. There is an overall calibration as part of the year end compensation review.

The Allianz Group's long-term incentive plan currently consists of Restricted Stock Units (RSUs) that vest following a four-year vesting period.

## **Fitness and Propriety Requirements**

ART Bermuda follows the AGCS Fit and Proper Policy. This policy describes principles, criteria and processes designed to ensure that those people who actually control the Company and work in key functions do indeed meet the professional qualifications and demonstrate the required personal propriety.

Sound processes during recruitment and both regular and ad hoc reviews as well as appropriate training are necessary to ensure Fitness and Propriety. Based on the information gathered during recruitment, review or an outsourcing due diligence, each case must be assessed individually, considering the following:

**Fitness:** if it appears that a member of the Senior Management, a Key Function Member or a candidate to such a position suffers from a specific lack of knowledge, competencies or skills, it shall be considered whether this gap can be addressed through specific professional training and if so, the person must be provided with such training

**Propriety:** any sign of a possible lack of Propriety must be taken into account for the assessment, including factors such as the type of misconduct or conviction, the severity of the case, the level of appeal (definitive vs. non-definitive conviction), the lapse of time since and the person's subsequent conduct, as well as the person's level of responsibility within the Company and the relevance of the finding for the respective position (i.e. the position's exposure to integrity and fraud risks). Furthermore, any finding with respect to a person's Propriety must be shared with the compliance and legal department.

The members of the Board and senior management shall collectively possess qualification, knowledge and expertise about:

- Insurance and/or asset management and financial markets, i.e. an understanding of the business, economic and market environment in which the Company operates;
- The business strategy and business model of the Company;
- ART Bermuda's system of governance, i.e. an understanding of the risks the Company is facing and the capability of managing them and of assessing the capacity of the Company to deliver effective governance, oversight and controls;
- Financial and actuarial analysis, i.e. the ability to interpret the Company's financial and actuarial information, identify key issues, put in place appropriate controls and take necessary measures based on this information; and
- Regulatory framework and requirements, i.e. an understanding of the regulator.

## Risk Management and Solvency Self-Assessment

As a provider of financial services, ART Bermuda considers risk management to be one of its core competencies. It is therefore an integral part of its business process. The Company's risk management framework is fully integrated into the risk management framework of the AGCS Group and covers, on a risk-based approach, all operations including IT, processes, products, and departments. The key elements of the risk management framework are:

- Promotion of a strong risk management culture, supported by a robust risk governance structure.
- Consistent application of a risk capital framework (using the Bermuda Solvency Capital Requirement model) to protect the company's capital base and support effective capital management.
- Integration of risk considerations and capital needs into management and decision-making processes.

The framework ensures that risks are identified, analyzed, assessed, and managed in a consistent manner. The risk appetite of ART Bermuda is defined by a risk strategy and limit structure. Close risk monitoring and reporting allows detection of potential deviations from the risk tolerance at an early stage.

For the benefit of shareholders and policyholders alike, the risk management framework adds value through the following four primary components:

*Risk underwriting and identification:* A sound risk underwriting and identification framework forms the foundation for adequate risk-taking and management decisions such as individual transaction approvals and strategic asset allocations. The framework includes risk assessments, risk standards, valuation methods, and clear minimum standards for underwriting.

*Risk reporting and monitoring:* The qualitative and quantitative risk reporting and monitoring framework provides management with the transparency and risk indicators to help them decide on our overall risk profile and whether it falls within delegated limits and authorities.

*Risk strategy and risk appetite:* The risk strategy defines the risk appetite of ART Bermuda. It ensures that rewards are appropriate for the risks taken and that the delegated authorities are in line with the overall risk-bearing capacity. The risk-return profile is improved through the integration of risk considerations and capital needs into decision-making processes. This also keeps risk strategy and business objectives consistent with each other and allows the company to take opportunities within its risk tolerance.

*Communication and transparency:* Finally, transparent and robust risk disclosure provides the basis for communicating this strategy to internal and external stakeholders, ensuring a sustainable positive impact on valuation and financing. It also strengthens the risk awareness and risk culture throughout the Company.

## **Strategy and objectives**

The risk strategy of ART Bermuda is aligned with and embedded in the overall risk strategy of AGCS and is a core element of the ART Bermuda risk management framework that defines a strategy for the management of risks that the company faces during the pursuit of its broader business plan. With the risk strategy, ART Bermuda aims to:

- protect the Allianz brand and reputation,
- remain solvent even in the event of extreme worst-case scenarios,
- maintain sufficient liquidity to always meet its obligations, and
- provide resilient profitability.

Implementation of the risk strategy is supported through the risk appetite, which establishes in more concrete terms the risk tolerance level of the company with respect to all material qualitative and quantitative risks in a manner that takes into account requirements imposed by regulators and rating agencies and shareholders' expectations.

In line with Allianz Group requirements, risk appetite is defined through the following five core elements:

- setting target ratings for top risks,
- defining minimum (target) capital ratios,
- managing liquidity to ensure flexibility,
- defining quantitative financial limits, and
- defining corporate rules that govern the conduct of business (i.e. policies, standards and functional rules).

## **Risk strategy process**

The alignment of the Company's business strategy and the risk strategy is integrated into the annual "Strategic Dialogue" and "Planning Dialogue" processes for the AGCS Group.

In the Strategic Dialogue, which takes place in the first half of a financial year, a top down indication of the operating profit and cost targets for the year are agreed. The targets are an update of the prior year's planning, based on actual results, changes in the portfolio, market expectations, new business strategies and their corresponding risks, and other management actions.

Following this outcome, a detailed business plan for a three-year time horizon is developed, and the plan is agreed during the Planning Dialogue in the second half of the financial year. The planning reflects the development of the technical result, taking into account both in-force business as well as new business, and involves planning of capital, dividends, investments and tax. The capital planning process ensures that the business plan is in line with the Company's risk-bearing capacity.

## **Overall risk organization and roles in risk management**

A comprehensive system of risk governance is achieved by setting standards related to organizational structure, risk strategy and appetite, written policies, limit systems, documentation, and reporting. These standards ensure the accurate and timely flow of risk-related information and a disciplined approach towards decision-making and execution. Allianz Risk Transfer (Bermuda) Limited, fully integrated in the risk governance framework the AGCS Group, adopts relevant policies, standards and functional rules of them.

As a general principle, the “first line of defense” rests with business managers. They are responsible, in the first instance, for both the risks of and returns on their decisions. The “second line of defense” is made up of independent oversight functions such as Risk, Actuarial, Compliance and Legal. “Second line of defense” functions support, challenge and have the oversight of business functions through proactive risk management. Internal Audit forms the “third line of defense”.

The risk officer of ART Bermuda operates under the direction of the AGCS Chief Risk Officer, and is independent from the business line management. The risk officer supports the Company’s Board of Directors as the primary risk controlling body. The risk officer maintains an independent risk oversight that includes all short and long term risks faced by ART Bermuda and drives the development of an adequate risk framework and a robust risk reporting. The risk officer shall be informed about all major risk related decisions.

## **Principles for risk management**

Risk management at ART Bermuda is based on a common understanding of the risks and comprehensively defined risk management and control processes with clear organizational structures, whereby the following principles apply.

### **Principle 1: Board of Directors is responsible for the risk strategy**

The ART Bermuda Board of Directors is responsible for establishing and adhering to a risk strategy for its respective business which is derived from, and consistent with, the AGCS Group business strategy. The risk strategy reflects the tolerance of risk, and thereby the desired level of confidence, in relation to clearly defined risk and performance criteria. The risk strategy is reviewed at least once a year and, if deemed necessary, adjusted and communicated to all impacted parties.

### **Principle 2: Risk capital as a key risk indicator**

The risk capital based on the BSCR model is the central parameter used to define risk tolerance. It serves as key indicator in the decision-making and risk management process with respect to capital allocation and limits. Capital is to be understood as risk-bearing capacity or available financial resources. Where relevant, ART Bermuda considers its impact on risk capital when taking material business decisions.

### **Principle 3: Clear definition of the organizational structure and risk processes**

An organizational structure is established at ART Bermuda, inclusive of the roles and responsibilities of all persons involved in the risk management process, which is clearly defined and which covers all risk categories. The structure shall be documented and communicated in a clear and complete manner to all relevant addresses

### **Principle 4: Measurement and evaluation of risks**

All material risks, including both single risks and risk concentrations across one or more risk categories, are measured using consistent quantitative and qualitative methods. Quantifiable risks are covered within the scope of the risk capital framework of the BSCR model. Risks that cannot be quantified based on the risk capital methodology, as well as complex risk structures resulting from a combination of multiple risks from one or more risk categories are assessed with the help of qualitative criteria and/or scenario analysis.

### **Principle 5: Development of limit systems**

A consistent limit system is in place to ensure adherence to the risk appetite and to manage concentration risk exposure and, where appropriate, assist with capital allocation. The limit system is to be based on relevant risk measures where applicable but should also be complemented by steering limits based on accounting or position information, and shall be regularly reviewed by the ART Bermuda Ltd. Board of Directors against the background of the defined risk strategy.

### **Principle 6: Mitigation of risks exceeding the risk appetite**

Appropriate risk mitigation techniques are employed to address instances where identified risks exceed, or otherwise breach, the established risk appetite. Where such cases occur, clear courses of action designed to resolve the breach are initiated, such as the adjustment of the risk appetite following a business review, the purchase of (re-) insurance, a strengthening of the control environment, or a reduction in, or hedging against, the underlying asset or liability giving rise to the risk.

### **Principle 7: Consistent and efficient monitoring**

Risk appetite and risk strategy are transferred into standardized limit management processes covering all quantifiable risks throughout the AGCS Group and taking into account the effects of risk diversification and risk concentration. A clearly defined and strict limit breach reporting and escalation process ensures that risk tolerance limits and target ratings for top risks (including for non-quantifiable risks) are adhered to and that, as appropriate, remediation activities are taken immediately if limits are exceeded. Early warning systems such as the monitoring of limits for high risks and emerging risk assessment are established to identify new and emerging risks, including complex risk structures, and identified risks are subject to continuous monitoring and regular reviews.

### **Principle 8: Consistent risk reporting and risk communication**

The risk officer of ART Bermuda generates internal risk reports at both predefined regular intervals and on an ad hoc basis, which contain relevant, risk-related information in a clear and concise form. Internal risk reporting is supplemented by duties of disclosure concerning emerging risks relevant to external stakeholders or constituents (e.g. regulators, rating agencies, shareholders, society).

### **Principle 9: Integration of risk management into business processes**

Risk management processes are embedded wherever possible directly within business processes, including strategic, tactical as well as day to day decisions impacting the risk profile. This approach ensures that risk management exists foremost as a forward looking mechanism to steer risk and only secondarily as a reactionary process.

### **Principle 10: Comprehensive and timely documentation**

All relevant methods, procedures, structures and processes are documented in a comprehensive and timely manner in order to ensure clarity and transparency.

### **Internal Controls**

ART Bermuda has implemented a formalized internal control system, the Enterprise-wide Risk-based Integrated Control (ERIC) System to manage significant operational risks to ART Bermuda through control activities on an ongoing basis and to ensure effectiveness of key controls at all times. In compliance with legal and regulatory as well as Allianz SE requirements, and following internationally recognized control frameworks such as Committee of Sponsoring Organizations of the Treadway Commission (COSO) this approach is designed to ensure that:

- The achievement of strategic business objectives is effectively supported and ART Bermuda's ability to conduct business is safeguarded
- Governance elements and business operations are effective



- Internal and external financial reporting and regulatory reporting processes produce complete and accurate information to support effective internal management decisions and to meet expectations of external stakeholders

The ERIC System formalizes key controls required to mitigate significant operational risks to ART Bermuda. A holistic view on these risks and controls is facilitated, and reasonable assurance is provided to The Board of ART Bermuda with regards to meeting the above objectives. Through the harmonized approach when engaging with the individual functions for operational risk and control assessments, the ERIC System also fosters the collaboration and information sharing across the Key Governance Functions: Compliance, Risk Management, Actuarial and Internal Audit.

Furthermore, the ERIC System creates risk and control awareness across the organization and provides transparency with respect to risk and control ownership. The quality of key controls is assessed in a structured and efficient manner. Supported by an effective Operational Risk Management Framework, potentially significant operational risks are identified early and measures are taken to avoid or mitigate these risks, in order to meet the operational risk tolerance defined by The Board of ART Bermuda through the ART Bermuda Top Risk Assessment.

The following key principles are the basis of the ERIC System:

- Focus on significant risks
- Focus on key controls
- Foster and enhance a positive risk and control culture
- Effectiveness of key controls
- Documentation of risks, controls and business processes
- Use of internal or external Providers and integrating them into the Internal Control System
- Control strategies such as segregation of duties and four-eyes-principle.

Risk and control assessment programs form the fundamental procedures to determine those operational risks that are in scope of the ERIC System; they set the focus on the significant risks to the objectives defined above. The programs provide individual views on the ART Bermuda risk and control landscape and complement each other. A balanced combination of these programs ensures a comprehensive coverage through the ERIC System while still being efficient and manageable.

Significant risks and key controls are identified and assessed along three levels:

- Management level (e.g. Entity-Level Controls, Top Risk Assessments, Global Operational Risk Assessment programs)
- IT level (e.g. IT General Controls)
- Process level (e.g. Financial and Regulatory Reporting Processes)

Through these assessment programs, significant risks are first identified and evaluated and then existing associated key controls are explicitly identified and assessed in terms of their appropriateness. Furthermore, operating effectiveness of key controls is assessed through control testing under the ERIC System.

If the level of risk is not acceptable (e.g. due to missing or ineffective key controls or due to inappropriate design of key controls), remediation activities will be defined and taken to meet the risk tolerance.

The ERIC Core Process follows an annual cycle consisting of four steps:

- Risk scoping
- Risk and control assessments including remediation and control updates
- Control testing and deficiencies
- Monitoring and reporting

ART Risk Management and the ART Bermuda Management Team has the oversight of the above mentioned steps

On a regular basis they form an opinion on:

- the ERIC System with respect to comprehensiveness and consistency
- the existence and execution of clear and consistent operational responsibilities and processes for the ERIC System
- the appropriateness and comprehensiveness of the focus of the risk and control assessment activities (e.g., annual risk focus/improvement areas, key business operations, risk scope, control testing scope);
- the effectiveness of the ERIC System particularly including the materiality of identified control deficiencies

## Risk Scoping

Proper risk scoping is crucial to focus risk and control assessment efforts on the significant risks and associated key controls. The scoping is an annual process following a top-down approach coordinated by the ART Risk Management function. Various aspects are considered in this context to ensure comprehensiveness, particularly the consideration of known weaknesses of controls and processes.

## Integrated Risk and Control Assessments and Remediation

Based on expert judgment, the inventory of the ERIC risks and controls are regularly reviewed and updated. In particular, all in-scope risks and associated key controls are assessed with respect

to their potential negative impact on the ERIC objectives during integrated Risk and Control Assessments.

### Control Testing and Deficiencies

Control testing is crucial to demonstrate the effectiveness of ART Bermuda's internal controls to external stakeholders and to build and maintain the trust of stakeholders in the reliability of these efforts. Clear and up-to-date documentation of key controls forms the basis for efficient control testing.

The ART Risk Management function proposes a structured and risk-based control testing scope, considering the outcome of the risk and control assessments. Further aspects such as identified deficiencies and significant changes in processes, controls or IT systems are also considered. The scope is reviewed by the ART Bermuda Management Team with respect to its appropriateness and comprehensiveness.

Following this scope, individual key controls are tested to ensure the effectiveness of risk mitigation activities. Based on documented evidence it is concluded whether or not the control is designed appropriately to mitigate the underlying risks (test of design) and whether or not it is operating effectively (test of operating effectiveness). Control testing activities are carried out through "independent testing" by risk management.

Missing key controls, or key controls that are not deemed to be designed appropriately or operating effectively, lead to a deficiency and require remediation. With the involvement of risk management, the materiality of the deficiency is assessed, and a realistic and detailed remediation plan is set up. When a control deficiency is considered to be remediated, the control needs to be re-tested.

### Monitoring and Reporting

On an annual basis, the AGCS Risk Management function prepares the global ERIC report with explicit consideration of ART Bermuda. This report is complemented by the ART Bermuda supplemental letter to the ERIC report, which is prepared by ART Risk Management. The ERIC report as well as the supplemental letter is provided to the ART Bermuda Management Team for signing off the overall effectiveness of the ERIC System. Finally the ART ERIC Report is distributed to the Board of Allianz Risk Transfer (Bermuda) Limited for review and approval.

### Compliance Function

On a regular basis, the Compliance Function identifies and assesses the compliance risk associated with the Company's business activities for the assigned/attribution risk areas. This is usually conducted in association with the annual Top Risk Assessment led by the Company's risk officer. The Compliance Function supports the Risk Management function in the various risk and control assessment programs under the ERIC Framework (e.g. through providing input to the scoping or

assuming risk / control owner responsibilities). The Compliance Function reports on a regular basis to the Board of Directors. This includes reporting on the results of the preceding Compliance Risk Assessment, any changes in the compliance risk profile, a summary of identified breaches and/or deficiencies and the recommended corrective measures.

### **Internal Audit**

The Company outsources the Internal Audit function to Allianz Internal Audit. As a separate unit within Allianz, their stated mission is to enhance and protect organizational value and aligning business improvement with customer and strategic focus by providing independent, objective assurance, advice, and insight, overall assisting the company in improving its internal control system. To accomplish the mission, they endeavor to act as an equal partner who faces conflicts constructively and clearly communicates recommendations and responsibilities.

### **Actuarial Function**

The Actuarial Function of ART Bermuda is embedded in the overall ART Corporate Actuarial function, which is led by the Appointed Actuary (Loss Reserve Specialist) of ART Bermuda, who is at the same time the Appointed Actuary of Allianz Risk Transfer AG. In order to avoid potential conflicts of interest, business actuaries (i.e. actuaries that perform first line of defense tasks in Underwriting) are not part of ART Corporate Actuarial. ART Corporate Actuarial covers the main areas Reserving/Analysis, Actuarial Diagnostics, Actuarial Risk Modeling and Actuarial Pricing Analytics.

As part of ART Corporate Actuarial, the Actuarial Function fulfills its duties in line with regulatory requirements. The Actuarial Function chairs the Loss Reserve Committee, which decides upon the level of reserves required under GAAP, and provides to the committee the recommended actuarial best estimate reserve level. Within the Loss Reserve Committee, the Actuarial Function is represented by the Loss Reserve Specialist as a voting member. Additionally, the Actuarial Function sets the technical reserves for the EBS and analyzes the sensitivity and the uncertainties around the technical provisions. The Actuarial Function has interfaces and works closely with other functions, in particular with the Risk Management Function, and takes an active role in the Risk Management processes of the Company. Among others, the Actuarial Function provides several inputs and conducts stress tests and scenario analysis for the Solvency Capital calculations under the BSCR and EBS capital models.

### **Outsourcing**

The Company follows the standards of the AGCS Outsourcing policy. Allianz defines Outsourcing, as an arrangement between an Outsourcing Operating Entity ('OE') and a different legal entity (Provider), be it Allianz Group internal or external, by which that Provider performs a certain process or activity (Function or Service) for a period of time, which would otherwise be

performed by the Outsourcing Operating Entity itself. As a result, the arrangement transfers the operational tasks of the activity to the Provider.

The Outsourcing process consists of four major phases:

- Decision phase
- Implementation phase
- Operational phase, and
- Exit phase

Group guidance includes the following:

It is incumbent on the Outsourcing OE to remain fully responsible for the proper execution of the outsourced Functions and Services as if the outsourced Functions and Services had not been outsourced. The OE must ensure compliance with all applicable laws and regulations and internal corporate rules. Notwithstanding this, the OE must have in place corporate rules, procedures and processes to the Outsourcing of Functions and Services that are appropriate in relation to the size and scope of the OE's business operations; it shall adopt relevant Group requirements and must enable an effective management of the risks associated with Outsourcing. Before implementing and executing Outsourcing Agreements, all necessary (internal and external) approvals must be obtained and documented. The initial Outsourcing of Functions shall require the approval of the OE's Board of Management, while for the initial Outsourcing of Services, as well as renewals of Outsourcing Agreements with regard to Functions or Services, the approval by the responsible member of the Board of Management may suffice.

Allianz Risk Transfer centralizes certain key functions, and the managers responsible for actuarial and risk management services are based in operating affiliates of ART Bermuda. There are no material functions that have been outsourced to a third party.

## Risk Profile

### Key risks/risk categories:

Allianz Risk Transfer (Bermuda) Limited is exposed to quantifiable and non-quantifiable risks. Quantifiable risks consist of the following risk categories: market risk, credit risk, underwriting risk and operational risk. Non-quantifiable risk categories are: liquidity risk, business risk, reputational risk and strategic risk.

Market risk comprises fixed income risk, equity risk, interest rate risk, currency risk and concentration risk. Fixed income risk reflects investment risk from fixed income instruments. Equity risk results from fluctuation in the value of or the income from equity investments. Interest rate risk refers to risk resulting from interest rate changes. Currency risk stems from movements in foreign currency exchange rates. Concentration risk means the risk of exposure to losses associated with inadequate diversification of portfolios of assets or obligations.

Credit risk includes the risk of loss arising from an inability of Allianz Risk Transfer (Bermuda) Limited to collect funds from debtors.

Underwriting risk (synonymously called insurance risk) consists of premium risk, reserve risk and catastrophe risk. Premium risk means the risk that premium is insufficient to meet future obligations. Reserve risk means the risk that an insurer's technical provisions may be insufficient to satisfy its obligations. Catastrophe risk means the risk of a single catastrophic event or series of catastrophic events that lead to a significant deviation in actual claims from the total expected claims.

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

Liquidity risk stems from unexpected financial losses due to a failure to meet, or to meet based on unfavorable altered conditions, short-term current or future payment obligations, as well as the risk that in the event of a liquidity crisis of Allianz Risk Transfer (Bermuda) Limited refinancing is only possible at higher interest rates or by liquidating assets at a discount.

Business risk results from unexpected decrease in actual results compared to business assumptions, which lead to a decline in income without a corresponding decrease in expenses; this includes lapse risk.

Reputational risk is defined as an unexpected drop in the value of Allianz share price, value of in-force or future business caused by a decline in the reputation of Allianz Group or one or more of its specific organizational entities from the perspective of its stakeholders.

Strategic risk is caused by unexpected negative changes in value of the Company arising from the adverse effect of management decisions regarding business strategies and their implementation.

### Risk profile/materiality of risks – BSCR view

ART Bermuda measures the quantifiable risks using the BSCR model

In the BSCR model, the largest risk exposures are premium risk, reserve risk, catastrophe risk and credit risk. Other contributors to the risk exposure are fixed income investment risk, equity investment risk, interest rate/liquidity risk, currency risk, concentration risk.

### Risk profile/materiality of risks – TRA view

The BSCR model is complemented by way of an annual Top Risk Assessment (TRA) conducted by ART Risk Management jointly with senior management of the company. The TRA is an integrated, comprehensive assessment of all material quantifiable and non-quantifiable eight risk categories to which ART Bermuda is exposed. The focus of the TRA is not on tail events (being reflected by the enhanced capital requirement in the BSCR model), but on the analysis of scenarios occurring once every 25 years or less. Within the TRA, results from internal economic risk modelling are taken into account.

The main risks identified are detailed below. The risk profile for the measurable risk categories emerging based on TRA and the BSCR model are generally in line.

For the Company, insurance risk is the primary risk whereas individual large transactions show high impact at the 1-in 10 years return period.

Based on the AGCS Standard for Operational Risk, the operational risk category includes legal risk, compliance risk and financial reporting risk. Based on occurrence and financial impact considerations legal risk is deemed higher than compliance and financial reporting risk.

Business risk includes the risk of changing regulations impacting operational efficiency. Overall, business risk is seen as a moderate risk with regards to the return period and financial impact.

Reputational risk is viewed to emerge primarily from underwriting or investment practices. In view of the reputational risk referral process implemented in the Allianz Group, which is also followed by ART Bermuda, the bottom-line impact is deemed low, with an unlikely occurrence probability.

Strategic decisions are part of an active management of the company. Management needs to take decisions regarding strategic market positioning, new business segments, underwriting risk appetite and resources. Any such decision may have positive or negative mid-long-term effects, both in terms of Income Statement impact and opportunity cost. Strategic risks are assessed to be unlikely, but may have a significant financial impact.

### Risk Mitigation

ART Bermuda has adopted the AGCS Risk Policy. The Risk Policy defines the broad risk categories described above, which are observed throughout the management and reporting of risks.



The approach for risk mitigation depends on the risk category.

Minimum and target capital ratios for quantifiable risks:

Quantifiable risks (i.e. insurance risk, market risk, credit risk and operational risk) are captured in the BSCR model. For managing the BSCR capital adequacy of ART Bermuda and to ensure adequate capitalization at all times, even following a significant adverse event, minimum (“red”) capital ratios and target (“amber”) capital ratios are defined. The Minimum Capital Ratio represents a capitalization level above the external capital requirements that is targeted not to be breached. It is defined in such a way that the buffer over the external capital requirements adheres to the following. It is:

- large enough such that a breach of the Minimum Capital Requirement does not generally occur in tandem with a breach of the external capital requirement so as to require remediating capital management actions
- while not being too large to avoid an unnecessary level of prudence of the Management Ratio.

The target capital ratio is defined in such a way that there is a reasonable buffer over the Minimum Capital Requirement taking into consideration the typical volatility of the capital ratio, plausible stress scenarios as well as the availability of remediation measures and the timeliness of their implementation.

Adherence to the minimum and target capital ratios is monitored at least annually by the ART Corporate Finance & Treasury Function (CF&T). If the capital ratio drops below the target capital ratio, an action plan is established and followed to ensure that the capital ratio does not decrease further to or below the minimum capital ratio, and how to increase the capital ratio above the target capital ratio in the mid-term (1 year). If the capital ratio drops below the minimum capital ratio an action plan is set up to ensure that the capital ratio increases above the target capital ratio in the mid-term (1 year).

Quantitative limits for underwriting risk:

Quantitative limits for insurance risks are defined in AGCS Functional Rule for Alternative Risk Transfer and Capital Solutions Business Three risk limits are defined for ART and Capital Solutions LoB. These limits define the risk appetite framework of ART and Capital Solutions LoB as stipulated in the AGCS UW Standard:

- gross limit for each contract that binds an AGCS legal entity to a risk written within the Alternative Risk Transfer portfolio; and
- a net limit for each transaction (one or more contracts that constitute an “UW Case”);
- a net portfolio limit for the Alternative Risk Transfer portfolio, and



- Adherence to the limits is monitored at the inception.

#### Quantitative limits for market and credit risk:

Quantitative limits for market and credit risk are defined for Allianz Risk Transfer (Bermuda) Limited. The limits refer to the asset allocation, duration and risk concentrations. Adherence to the limits is monitored centrally by AGCS CF&T at least on a quarterly basis.

#### Underwriting Risk:

Underwriting risk is mitigated not only by means of limits (see above), but also by following the global underwriting process of the ART and Capital Solutions LoB which includes a thorough risk assessment.

With respect to the residual risks, ART Bermuda regularly monitors the development of technical provisions at the individual contract level. In addition, ART Bermuda carries out annual reserve uncertainty analyses in order to analyze the sensitivity of reserves to the assumptions underlying their calculations.

Excessive risks are mitigated by reinsurance contracts.

#### Operational Risk:

Operational risk is mitigated through controls in the AGCS Enterprise-wide Risk-based Integrated Control (ERIC) system, which is also implemented for ART Bermuda. The ERIC system is subject to an annual independent testing of the design and operating effectiveness of the controls through Risk Management.

#### Reputational risk:

ART Bermuda adheres to the AGCS Standard for Reputational Risk and Issues Management. In addition, there are established robust compliance and financial crimes prevention procedures on an individual transaction level. Reputational risk is assessed in the course of the underwriting and transaction approval process.

#### Liquidity, business and strategic risk:

Liquidity risk is considered to be a secondary risk following loss events, financial market distresses or other events that may generate payments under the company's transactions. The risk of cost for liquidity is strongly mitigated by investments in cash and liquid bonds and access to the Allianz Group cash pool.

Business and strategic risk are assessed through the annual TRA process. Mitigants are implemented by the Board of Allianz Risk Transfer (Bermuda) Limited as required, based on the bespoke top risk scenario identified.

The effectiveness of the mitigation methods is ensured through the ERIC system, which includes controls on entity level as well as on process level. The effectiveness of the ERIC system is globally assessed by the AGCS Advisory Group.

#### Stress Testing and Sensitivity Analysis

Stress testing and sensitivity analyses are performed as part of the annual BSCR submission in line with the guideline for stress/scenario analysis for class 3A (re)insurers published by the BMA. This analysis includes stress scenarios predefined by BMA covering e.g. a financial market stress, a rating downgrade of ART Bermuda and aggregate worst-case aggregate loss scenarios. Moreover, the analysis covers underwriting scenarios defined by ART Bermuda and a reverse stress test scenario.

The worst case financial market scenario is the stress event R5 described in the guideline for stress/scenario analysis for class 3A (re)insurers published by the BMA. This stress is related to a combination of R1, R2, R3 & R4 consisting of decline in equity prices, investment holdings in investment holdings that cannot be characterized as equity, bonds, cash, foreign exchange and mutual funds, extreme yield curve widening and general widening of credit spreads. The stress event R5 leads to a modeled loss of USD 9.6mn.

The considered worst case underwriting scenario resembles the maximum modelled loss in the stochastic model for the most material excess liability contract. This scenario leads to a net loss impact of USD 45.4mn.

As part of the underwriting process, stress tests and sensitivity analyses are performed for individual transactions as required. Each transaction model is subject to an independent analytic review and sign-off.

## Solvency Valuation

The valuation bases, assumptions and methods used to derive the value of each asset class are as follows:

Cash and cash equivalents are carried at cost.

Quoted investments: Fixed maturity investments are classified as available for sale or held for trading and recorded at fair value. Changes in unrealized gains or losses, net of related tax effects, for investments classified as available for sale are reflected in the statutory statement of capital and surplus and for investments classified as held for trading in the statement of income. The fair value of fixed maturity securities is based upon quoted market values where available, “evaluated bid” prices provided by third party pricing services (“pricing services”) where quoted market values are not available, or by reference to broker or underwriter bid indications where pricing services do not provide coverage for a particular security. Investment income, net of investment expenses, is accrued to the balance sheet date and includes amortization of premiums or discount on fixed maturity securities purchased at amounts different from their par value.

Unquoted Equity securities are accounted for using the cost method of accounting.

Unquoted Bonds and Debenture securities are held at amortised cost.

Unquoted Investments in mutual funds are recorded at the net asset value of the fund at the balance sheet date.

Investments with unrealized losses considered to be other than temporary are written down to fair value, creating a new cost basis for the investment. The impairment is recorded within realized losses on the statutory statement of income.

Investments in and advances to affiliates, Accounts and Premiums Receivable and Reinsurance Balances Receivable are recorded at the recoverable amount.

Derivative instruments are recorded at fair value. The fair values of derivatives are estimated by management. The estimation of fair value is complex and requires management to exercise significant judgment. The fair values of derivatives are recorded as assets or liabilities as appropriate and changes in fair values are recorded in current earnings

The insurance portfolio of ART Bermuda consists of multiple (re-)insurance transactions. The technical provisions are estimated per transaction, using well-known actuarial techniques, for which the initial expected loss ratio and the actual claims development are key inputs. The discount rates used are Solvency II risk free discount curves as published by EIOPA<sup>1</sup>. These discount curves meet the same overall objectives as the rates supplied by the BMA. The Risk Margin has been calculated following the principles issued by the BMA and amounts to USD 4.4m as per year end

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<sup>1</sup> The European Insurance and Occupational Pensions Authority

2019. The amount of (net) Technical Provisions (excluding Risk Margin) amounts to USD 81.2m as per year end 2019. Since the book of business has not changed much compared to previous year, the uncertainty within the estimation of the best estimate reserves remains mostly unchanged compared to previous year, and is overall at a moderate level.

Recoverables from reinsurance contracts includes the unearned portion of premiums written on ceded reinsurance contracts and loss reserves recoverable under those contracts.

Other liabilities are recorded at the payable amount, or, in the case of accruals, the unexpired portion of an accrued expense.

## Capital Management

### Eligible Capital

The Company uses the BSCR model to determine capital needs for business planning. There have been no material changes during the course of the reporting period.

The Company's eligible capital by categories is as follows:

### Tier 1 and Tier 2 Eligible Capital

Fully paid common shares	\$ 120,000
Contributed Surplus	49,880,000
Statutory Economic Surplus (Tier 1)	1,648,122
Statutory Economic Surplus (Tier 2)	<u>39,905,002</u>
<b>Total</b>	<b><u>\$ 91,553,124</u></b>

The categorisation above is in accordance with the Eligible Capital Rules used to meet the Enhanced Capital Requirement and the Minimum Margin of Solvency.

Differences in shareholder's equity as stated in the condensed financial statements versus available statutory capital and surplus arise as a result of the net after tax impact of the accounting treatment of prepayments and lease liabilities.

### Regulatory Capital Requirements

As at December 31, 2019, Regulatory Capital Requirements were as follows:

Enhanced Capital Requirement ('ECR')	\$ 60,699,998
Minimum Margin of Solvency	\$ 18,016,410

The Company is in compliance with the regulatory capital requirements.

Approved Internal Capital Model used to derive the ECR.

The BSCR model is used for the calculation of all risks; see Risk Profile section for a detailed description of the Company's risk evaluation methodology.

## **Subsequent Event**

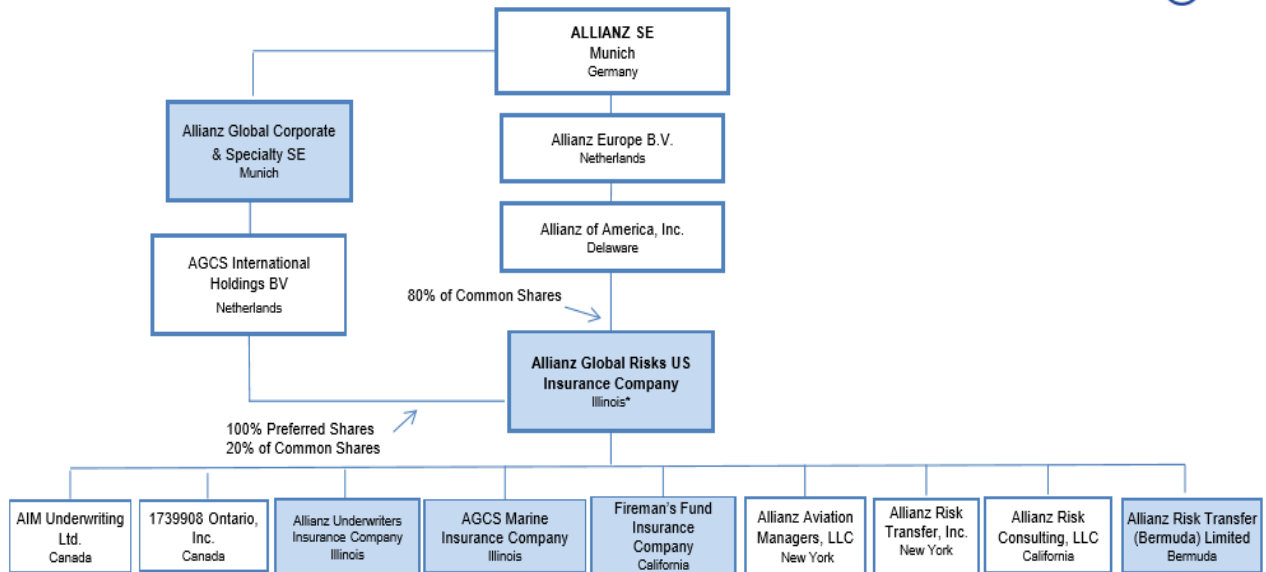
No significant events have occurred, other than noted below, since the balance sheet date up to the date of filing this report.

To date in 2020 COVID-19 has evolved into an unprecedented public health emergency around the world, causing disruption to business and economic activity. The Company considers this outbreak to be a non-adjusting post balance sheet event.

The situation remains dynamic as governments around the globe take unprecedented measures to slow the spread and mitigate the human tragedy. Management is still assessing the potential impacts and as the circumstances are evolving rapidly, we do not consider it practicable to provide a quantitative measure of the potential impacts on the Company.

## SCHEDULE A – Group Organisation Chart

### AGCS NA Corporate Organization Structure



Note: Subsidiary relationships are 100% owned except where indicated

\*Allianz Global Risks US Insurance Company has a branch office domiciled in Ontario, Canada.

**DECLARATION ON THE FINANCIAL CONDITION REPORT of  
ALLIANZ RISK TRANSFER (BERMUDA) LIMITED (the “Company”)**

We, Thomas Schatzmann, Director, and David Brown, President, of Allianz Risk Transfer (Bermuda) Limited, **DO SOLEMNLY DECLARE THAT** to the best of our knowledge and belief, the Financial Condition Report fairly represents the financial condition of the Company in all material respects.

Signatory \_\_\_\_\_DB\_\_\_\_\_

Print Name David Brown  
Director  
Allianz Risk Transfer (Bermuda) Limited

Date 25 June, 2020

Signatory \_\_\_\_\_TS\_\_\_\_\_

Print Name Thomas Schatzmann  
Director  
Allianz Risk Transfer (Bermuda) Limited

Date 25 June, 2020