SPINNAKER BIDCO LIMITED

SOLVENCY AND FINANCIAL CONDITION REPORT

Reporting Period 2020

Date of publication: 20 May 2021

50 Cannon Street

London

EC4N 6JJ

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EXECUTIVE SUMMARY

Spinnaker Bidco Limited ("**Spinnaker**") is a UK insurance holding company whose subsidiaries carry on insurance and related activities (Spinnaker and its subsidiaries hereinafter referred to as the "**Group**"). The only insurance entity in the Group is Aetna Insurance Company Limited ("**AICL**"), which is an insurer licensed in the United Kingdom. The other significant entity within the Group is a regulated insurance mediation company, Aetna Global Benefits (UK) Limited ("**AGBUK**"), in the United Kingdom, whose principal activity in 2020 was to service the insurance business of AICL.

There are no published consolidated financial statements prepared at the Spinnaker Bidco Limited level. For preparing this report, consolidated financial statements were prepared by aggregating the financial statements for the entities in the Solvency II Group and eliminating any inter-company transactions between entities within the Solvency II Group. Similarly, the Solvency II valuation was prepared aggregating inputs for each of the entities in the Group and also eliminating inter-company transactions within the Group.

The harmonised European Union regulatory regime for insurance companies, known as Solvency II, came into force with effect from 1 January 2016. This report is the fifth Solvency and Financial Condition Report ("**SFCR**") that Spinnaker has been required to publish under the Solvency II regime. This report covers the following in relation to the Group during the reporting period 1 January 2020 to 31 December 2020 (the "**Reporting Period**"): its Business and Performance, its System of Governance, its Risk Profile, its Valuation for Solvency Purposes and its Capital Management. This Group report is presented in United Stated Dollars ("**USD**" or "**$**") and the figures stated herein are accordingly USD.

Business of the Group during 2020

The Group forms part of the Aetna International division ("**Aetna International**") of the CVS Health Corporation Group of companies (**"CVS Group"**).

The Group supports the Aetna International strategy to provide international private medical insurance ("**IPMI**") contracts to individuals and groups throughout the global market including Europe, the Middle East, Asia and Africa. The Group's support for the Aetna International strategy is effective through the business accepted by AICL, which includes business written on a direct basis and also on a reinsurance basis from fronting partners in those territories where AICL is not permitted to write business directly.

All IPMI plans sold by AICL are short term in nature and renewable by invitation on an annual basis.

There are two types of pricing structures:

a) Community rated

Community rated products include a pricing structure for a single population, with different price points depending on age and location. These will typically be purchased by individuals and small employer sponsored groups.

b) Experience rated

Experience rated products are offered to larger employer sponsored groups (100+ employees), where a target claims fund is set by reference to the historical claims experience. The claims funds for each experience rated group is reviewed on an annual basis.

The plan designs include a common architecture and structure for benefit tables across regional variation of plans sold, which facilitate the performance of claims analytics across the entire Aetna International block of business. The cost of medical treatments can be assessed and compared across the multiple locations, with AICL approving annual premium increases to cover medical cost inflation for the AICL products and/or to correct the AICL's claims exposure for experience rated groups. Premium adjustments are calculated and are effective from the date any changes are made to the number of employees or family members covered under the plan.

Business Performance

This report relates to the Group and in particular, the activities of AICL which is the only Solvency II insurance company in the Group. As noted above, AGBUK services the activities of AICL. The underwriting performance of the Group follows AICL as the sole insurance company within the Group.

The earned revenue for the year was $322,518k (2019: $325,672k) and the underwriting result was $114,962k (2019: $104,481K). Slower new business growth impacted earned revenue, whilst at the same time strong retention rates and reduced medical insurance claims costs contributed to the increase in the underwriting result.

Total costs were $128,531k (2019: $126,406k), which included a slight increase in acquisition costs which was offset by a slight reduction in administration costs due to impact of lockdown restrictions on (travel and office consumables). There were no changes to the rates for external acquisition costs and normal changes in business mix impacted the total cost incurred. The Group continues to maintain a tight discipline over recurring costs.

The Solvency II technical provisions were $136,253k (2019: $143,568k) and the main reason for the reduction relates to a reduction in insurance receivables between 2019 and 2020, as premium collection in 2020 was strong, evidenced by increased cash balances at end 2020. Although retention rates and underwriting performance were strong through the Coronavirus pandemic, the expected level of growth was not achieved.

Capital Management

The Group uses the Solvency II Standard Formula to calculate its Solvency Capital Requirement. This is appropriate given that the only insurance company within the Group, AICL, has a mono-line product with contracts are renewable on an annual basis. The Group also reviews the capital requirements against capital models from rating agencies and the Spinnaker Board of Directors is satisfied that the Solvency II Standard Formula is, and remains, the most appropriate method for determining the Group solvency requirements.

The Group's Solvency Capital Requirement (under the Solvency II Standard Formula) at 31 December 2020 is $83,304k (2019: $87,895k). The Group has $210,744k of eligible capital resources to meet its Solvency Capital Requirement, providing a surplus of $127,440k and a solvency ratio of 253%. Both metrics are defined by regulations to mean the excess of the Group's eligible own funds over its Solvency Capital Requirement.

Group – Solvency Capital Summary at 31st December 2020	2020 $000	2019 $000
Total eligible Own Funds	210,744	191,287
Standard Formula for Solvency Capital Requirement	83,304	87,895
Surplus	127,440	103,392
Solvency Ratio	**253%**	**218%**

Governance

Spinnaker's Board of Directors is responsible for the governance of Spinnaker. However, the governance processes of the Group principally exist within AICL as the sole Solvency II insurance company within the Group and the main operating company within the Group. These are detailed further below. The main source of income for AGBUK is the fees earned for administrating the AICL business. The AICL governance process includes oversight of AGBUK's activities as its service company. Notwithstanding, AGBUK's board of directors are responsible for and oversee its activities.

The AICL Board has responsibility for ensuring that AICL has an effective system of governance. It is responsible for overseeing the conduct of AICL's business and supervising the executive team which is responsible for its day to day management. The Aetna International Group Chief Finance Officer ("**Group CFO**") is a director of the Spinnaker Board of Directors.

The Group uses the risk management framework of AICL to manage its risks given that the primary activity of the Group is the insurance underwritten by AICL and therefore the Group's risk is driven by this. As noted above, in addition to AICL, the other material entity within the Group is AGBUK, which services the insurance business underwritten by AICL and its risks are therefore inherently linked to AICL. The Spinnaker Board of Directors is satisfied that the risk management framework adopted by AICL is appropriate for managing the risks of the Group as a whole. The Group CFO ensures that the AICL risk management framework appropriately considers risks at the AICL and Group level through his roles within the Group.

AICL's risk management system is fully integrated into the strategic planning and annual business plans approved by the AICL Board. The AICL Own Risk & Solvency Assessment process provides the Spinnaker Board of Directors with updates on the Group's risk profile and assists it to capital plan over a three-year horizon. A risk scorecard is used to report on risk tolerances and provide the baseline for risk scenario testing.

The Spinnaker Board of Directors is satisfied with the capital management process in place to ensure AICL and the Group meets its regulatory capital requirements and that it continues to do so as its business grows.

DIRECTORS' RESPONSIBILITY STATEMENT

The Spinnaker Board of Directors is responsible for the ensuring that this SFCR has been properly prepared in all material respects with the Prudential Regulation Authority rules **("PRA Rules")** and the Solvency II Regulations.

The Spinnaker Board of Directors is satisfied that:

(a) throughout the Reporting Period to which this SFCR relates, the Group has complied in all material respects with the PRA Rules and the Solvency II Regulations as applicable to it; and

(b) it is reasonable to believe that, at the date of publication of this SFCR, the Group has continued to so comply, and will continue to so to comply in the foreseeable future.

On behalf of the Spinnaker Board of Directors

Mark Howe

Director

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Report of the independent external auditor to the Directors of Spinnaker Bidco Limited ('the Company') pursuant to Rule 4.1(2) of the External Audit Part of the PRA Rulebook applicable to Solvency II firms

Report on the Audit of the relevant elements of the Group Solvency and Financial Condition Report

Opinion

Except as stated below, we have audited the following documents prepared by the Company as at **31 December 2020:**

- The 'Valuation for solvency purposes' and 'Capital Management' sections of the Group Solvency and Financial Condition Report of the Company as at **31 December 2020**, ('**the Narrative Disclosures subject to audit'**); and
- Group templates S.02.01.02, S.23.01.22, S.25.01.22, S32.01.22 ('**the Templates subject to audit'**).

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

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

- The 'Business and performance', 'System of governance' and 'Risk profile' elements of the Group Solvency and Financial Condition Report;
- Group templates S.05.01.02, S.05.02.01; and
- the written acknowledgement by management of their responsibilities, including for the preparation of the Group Solvency and Financial Condition Report ('**the Responsibility Statement**')

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

In our opinion, the information subject to audit in the relevant elements of the Group Solvency and Financial Condition Report of Spinnaker Bidco Limited as at 31 December 2020 is prepared, in all material respects, in accordance with the financial reporting provisions of the PRA Rules and Solvency II regulations on which they are based.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) including ISA (UK) 800 *(Revised) Special Considerations – Audits of Financial Statements Prepared in Accordance with Special Purpose Frameworks'* and ISA (UK) 805 *(Revised) Special Considerations -*

Audits of Single Financial Statements and Specific Elements, Accounts or Items of a Financial Statement', and applicable law. Our responsibilities under those standards are further described in the *Auditor's Responsibilities for the Audit of the relevant elements of the Group Solvency and Financial Condition Report* section of our report. We are independent of the Company in accordance with the ethical requirements that are relevant to our audit of the Group Solvency and Financial Condition Report in the UK, including the FRC's Ethical Standard as applied to public interest entities, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Conclusions relating to going concern

In auditing the relevant elements of the Group Solvency and Financial Condition Report, we have concluded that the Director's use of the going concern basis of accounting in the preparation of the Group Solvency and Financial Condition Report is appropriate. Our evaluation of the Directors' assessment of the Group's ability to continue to adopt the going concern basis of accounting primarily consisted of considering AICL's ability to continue to adopt the going concern basis of accounting as AICL is the only insurance entity in the Group and included:

- confirming our understanding of management's going concern assessment process and obtaining management's assessment which covers 12 months from the date of approval of the AICL financial statements;

- challenging the assumptions used in management's forecast and determining that the models are appropriate to enable management to make an assessment on the going concern of AICL;

- assessing the accuracy of management's forecast by testing the inputs and the clerical accuracy;

- evaluating the liquidity and solvency position of AICL by reviewing base case liquidity and solvency projections that incorporate an estimated view of the impacts of COVID-19;

- with support from actuarial team, obtaining and reviewing the latest Board approved ORSA, assessing whether the stress testing included in the ORSA was reasonable and considering the solvency position under each stress scenario;

- evaluating management's forecast analysis to understand how severe the downside scenarios would have to be to result in the elimination of solvency headroom and concluded the likelihood of such severe downside scenarios to be remote;

- assessing the plausibility of available management actions to mitigate the impact of the key risks by comparing them to our understanding of AICL;

- performing enquiries of management and those charged with governance to identify risks or events that may impact the AICL's ability to continue as a going concern. We also reviewed management's assessment as approved by the Board, minutes of meetings of the

Board and its committees, and made enquiries as to the impact of COVID-19 on the business; and

• assessing the appropriateness of the going concern disclosures by comparing the consistency with management's assessment and for compliance with the relevant reporting requirements.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Company's ability to continue as a going concern for a period of 12 months from when the relevant elements of the Group Solvency and Financial Condition Report are authorised for issue.

Our responsibilities and the responsibilities of the Directors with respect to going concern are described in the relevant sections of this report. However, because not all future events or conditions can be predicted, this statement is not a guarantee as to the Company's ability to continue as a going concern.

Emphasis of Matter – Basis of Accounting & Restriction on Use
We draw attention to the 'Valuation for solvency purposes', 'Capital Management' and other relevant disclosures sections of the Group Solvency and Financial Condition Report, which describe the basis of accounting. The Group Solvency and Financial Condition Report is prepared in compliance with the financial reporting provisions of the PRA Rules and Solvency II regulations, and therefore in accordance with a special purpose financial reporting framework. The Group Solvency and Financial Condition Report is required to be published, and intended users include but are not limited to the Prudential Regulation Authority. As a result, the Solvency and Financial Condition Report may not be suitable for another purpose.

This report is made solely to the Directors of the Company in accordance with Rule 2.1 of the External Audit Part of the PRA Rulebook for Solvency II firms. Our work has been undertaken so that we might report to the Directors those matters that we have agreed to state to them in this report and for no other purpose.

Our opinion is not modified in respect of these matters.

Other Information
The Directors are responsible for the Other Information contained within the Group Solvency and Financial Condition Report.

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

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

Responsibilities of Directors for the Group Solvency and Financial Condition Report
The Directors are responsible for the preparation of the Group Solvency and Financial Condition Report in accordance with the financial reporting provisions of the PRA rules and Solvency II regulations.

The Directors are also responsible for such internal control as they determine is necessary to enable the preparation of a Group Solvency and Financial Condition Report that is free from material misstatement, whether due to fraud or error.

In preparing the Group Solvency and Financial Condition Report, the Directors are responsible for assessing the Company's ability to continue in operation, disclosing as applicable, matters related to its ability to continue in operation and using the going concern basis of accounting unless the Directors either intend to cease to operate the Company, or have no realistic alternative but to do so.

Those charged with governance are responsible for overseeing the Company's financial reporting process.

Auditor's Responsibilities for the Audit of the relevant elements of the Group Solvency and Financial Condition Report
It is our responsibility to form an independent opinion as to whether the relevant elements of the Group Solvency and Financial Condition Report are prepared, in all material respects, with the financial reporting provisions of the PRA Rules and Solvency II regulations on which they are based.

Our objectives are to obtain reasonable assurance about whether the relevant elements of the Group Solvency and Financial Condition Report are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but it is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists.

Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the decision making or the judgement of the users taken on the basis of the Group Solvency and Financial Condition Report.

Explanation as to what extent the audit was considered capable of detecting irregularities, including fraud

Irregularities, including fraud, are instances of non-compliance with laws and regulations. We design procedures in line with our responsibilities, outlined above, to detect irregularities, including fraud.

The risk of not detecting a material misstatement due to fraud is higher than the risk of not detecting one resulting from error, as fraud may involve deliberate concealment by, for example, forgery or intentional misrepresentations, or through collusion. The extent to which our procedures are capable of detecting irregularities, including fraud is detailed below.

However, the primary responsibility for the prevention and detection of fraud rests with both those charged with governance of the Group and management.

- We obtained a general understanding of the legal and regulatory frameworks that are applicable to the Group and determined that the direct laws and regulations, related to elements of company law and tax legislation, and the financial reporting framework. Our considerations of other laws and regulations that may have a material effect on the financial statements and the Solvency and Financial Condition Report included permissions and supervisory requirements of the Prudential Regulation Authority ('PRA') and the Financial Conduct Authority ('FCA').

- We obtained a general understanding of how the Group complies with these legal and regulatory frameworks by making enquiries of management, internal audit, and those responsible for legal and compliance matters. We also reviewed correspondence between the Group and UK regulatory bodies; reviewed minutes of the Board and the Audit and Risk Committee; and gained an understanding of the Group's approach to governance, demonstrated by the Board's approval of the Group's governance framework and the Board's review of the Group's risk management framework ('RMF') and internal control processes.

- For direct laws and regulations, we considered the extent of compliance with those laws and regulations as part of our procedures on the related items in the financial statements and the Solvency II balance sheet.

- For both direct and other laws and regulations, our procedures involved: making enquiry of those charged with governance and senior management for their awareness of any non-compliance of laws or regulations, inquiring about the policies that have been established to prevent non-compliance with laws and regulations by officers and employees, inquiring about the Group's methods of enforcing and monitoring compliance with such policies and inspecting significant correspondence with the FCA and PRA.

- We assessed the susceptibility of the Group's financial statements and the Solvency and Financial Condition Report to material misstatement, including how fraud might occur, by considering the controls that the Group has established to address risks identified by the entity, or that otherwise seek to prevent, deter or detect fraud. We also considered areas of significant judgement, and the impact these have on the control environment. Where this risk was considered to be higher, we performed audit procedures to address each identified fraud risk, including the procedures over the actuarial assumptions used to calculate the technical provisions as well as testing manual journals over revenue accounts. These procedures were designed to provide reasonable assurance that the financial statements and the Solvency and Financial Condition Report were free from fraud or error.

- The Group operates in the insurance industry which is a highly regulated environment. As such the Senior Statutory Auditor considered the experience and expertise of the engagement team to ensure that the team had the appropriate competence and capabilities, which included the use of specialists where appropriate.

A further description of our responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at: https://www.frc.org.uk/auditorsresponsibilities**.**This description forms part of our auditor's Report on the Group Solvency and Financial Condition Report.

Report on Other Legal and Regulatory Requirements.

Other Information

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

Ernst & Young LLP

Ernst & Young LLP
Bristol
20 May 2021

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

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

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

A. BUSINESS PERFORMANCE

A.1 Business

Company and its subsidiaries

Spinnaker Bidco Limited (hereinafter referred to as "**Spinnaker**") is a private company limited by shares which is incorporated in England with company number 06078307. Its registered address is 50 Cannon Street, London, EC4N 6JJ, United Kingdom ("**UK**") and the nature of its business is an insurance holding company.

Spinnaker has the following wholly owned subsidiary companies (Spinnaker and the subsidiaries hereinafter referred to as the "**Group**"):

- **Aetna Holdco (UK) Limited**

  This is a private company limited by shares which is incorporated in England with company number 06030487. Its registered address is 50 Cannon Street, London, EC4N 6JJ, UK and the nature of its business is an insurance holding company.

- **Aetna Insurance Company Limited ("AICL")**

  AICL is a private company limited by shares which is incorporated in England with company number 05956141. Its registered address is 50 Cannon Street, London, EC4N 6JJ, UK and its principal place of business is 25 Templar Avenue, IQ Farnborough, Farnborough, Hampshire, GU14 6FE, UK. It is a UK authorised insurance company providing international private medical insurance for individuals and groups. AICL also has a branch registered in Singapore.

- **Aetna Global Benefits (UK) Limited ("AGBUK")**

  AGBUK is a private company limited by shares which is incorporated in England with company number 03554885. Its registered address is 50 Cannon Street, London, EC4N 6JJ, UK and its principal place of business is 25 Templar Avenue, IQ Farnborough, Farnborough, Hampshire, GU14 6FE, UK. It is a UK authorised insurance administrator and service company. AGBUK has branches registered in Singapore and in South Africa.

Regulators

Within the Group there are two UK regulated subsidiaries:

- AICL is a UK insurance company authorised by the Prudential Regulation Authority ("**PRA**") and regulated by both the PRA and the Financial Conduct Authority ("**FCA**") with firm reference number 458505; and
- AGBUK is a UK insurance administrator authorised to carry on insurance mediation activity by the FCA with firm reference number 312279.

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

http://www.bankofengland.co.uk/pra/Pages/default.aspx

https://www.fca.org.uk/

AICL also maintains a branch in Singapore which is separately authorised and regulated by the Monetary Authority of Singapore ("**MAS**") (http://www.mas.gov.sg/).

External Auditors

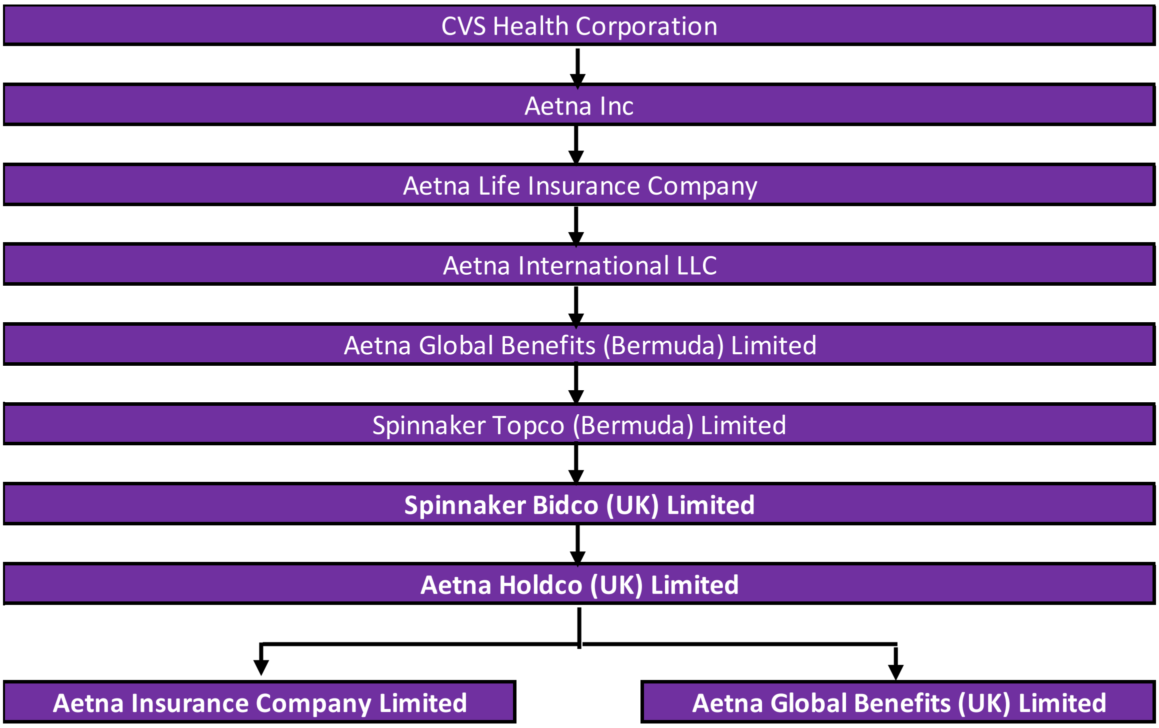
The Group's external auditor is Ernst & Young LLP whose address is The Paragon, 32 Counterslip, Bristol BS1 6BX, United Kingdom

Legal Structure & Qualifying Holdings

The Group forms part of the Aetna International division of the CVS Group which sits under CVS Health Corporation, a company incorporated in Delaware (USA).

The simplified group structure diagram on the next page shows the holders of qualifying holdings in Spinnaker. It also shows those other companies within the Company's Group Supervision under the Group Supervision Part of the PRA Rulebook for Solvency II Firms ("Solvency II Group Supervision"), hereinafter referred to as the "**Solvency II Group**".

Legal Entity Structure Chart as at 31st December 2020 (extract)



Method of Consolidation

The consolidated data for the purposes of the Group solvency calculation includes full consolidation of Aetna Holdco (UK) Limited, full consolidation of the insurance undertaking, AICL, and full consolidation of AGBUK, the insurance service undertaking, which are subsidiaries of Spinnaker. The Solvency II valuation rules are applied to the assets and liabilities in the consolidated balance sheet.

Employees

The only company within the Group which has employees in the UK is AGBUK. AGBUK's employees principally service the activities of AICL and a sister company within the CVS Group, Aetna Life & Casualty (Bermuda) Limited (**"AL&C"**).

Business and significant events in the Reporting Period

This report relates to the Group and, in particular, the activities of AICL which is the only Solvency II insurance company in the Group. Spinnaker supports the Aetna International strategy through its ownership of AICL. As noted above, AGBUK services the activities of AICL and AL&C. AGBUK continues to use the cost-plus methodology adopted in 2017 to recover its incurred costs from AICL and AL&C.

A separate solo SFCR has been published for AICL and can be found on the Aetna International website (www.aetnainternational.com).

AICL provides international private medical insurance contracts to individuals and groups throughout the global market including Europe, the Middle East, Asia and Africa. In addition to accepting business directly, AICL also accepts international private medical insurance business on a reinsurance basis from its business partner in the United Arab Emirates (**"UAE"**), Al Ain Ahlia Insurance Co. (PSC) (**"AAA"**).

The CVS Group continues to maintain the cost base and infrastructure to support planned business growth of the Aetna International business in the future. The total costs were $128,531k (2019: $126,406k).

The total recurring costs for the service company were $92,858k (2019: $94,471k) where the main reductions between 2019 and 2020 related to lower travel and office consumable costs during lockdown periods. In addition, there were reductions to internal costs to offset against direct costs incurred with migration of services to a third-party administrator in the United Arab Emirates. The agreement to transfer some administration services and claims processing was signed in 2019, with the migration of services for risks located in the United Arab Emirates taking full affect in 2020

There was no additional capital contribution in 2020 as the Group is sufficiently capitalised for the planned future growth.

A.2 Underwriting Performance

The underwriting performance of the Group follows AICL as the sole insurance company within the Group.

AICL has a single product, international private medical insurance. It is positioned to support the Aetna International strategy to provide international private medical insurance to employer sponsored groups and individuals in multiple locations. The business accepted by AICL is viewed as one single growth market within the Aetna Inc. Group.

The following table summarises the movement in the underwriting result for AICL between the year ended 31 December 2020 and the year ended 31 December 2019 for comparison:

	2020 $000	2019 $000
Net Written Premiums	296,309	339,457
Earned Revenue	322,518	325,672
Net Incurred Medical Costs	207,556	221,191
Underwriting Result	**114,962**	**104,481**
Medical Benefit Ratio ("MBR")	64.4%	67.9%

The total underwriting result in the above table includes risks in multiple locations and the business is substantially similar across the different geographies.

The reduction in the written premium reflects the impact of Covid-19, where although retention rates were strong, there were fewer opportunities for additional new business. In addition, the largest single scheme written in 2019 (circa $25m GWP) transferred to a self-insured scheme in July 2020. This scheme continues to be serviced by AICL and will transfer back to a fully insured scheme in 2021. The change in the incurred claims loss ratio 64.4% (2019: 67.9%) is the main driver for the increase in the underwriting result. The main driver for the lower claim's loss ratio was suppressed claims activity during Covid-19 lock down restrictions.

The Board is satisfied that underwriting disciplines and the operating model for robust management of claims operations will ensure appropriate underwriting margins are achieved going forward.

AICL does not report its results by business segment in the financial statements and shows the total underwriting result for the single product line in the profit and loss account. The notes to the financial statements include additional information on premiums, including the home country, the UK, and top 5 other geographic territories, which is shown in the table below:

Gross Written Premiums $000	United Arab Emirates	Singapore	United Kingdom	Viet Nam	Netherlands	Thailand	Kuwait
2020	159,537	58,586	37,629	6,603	3,608	-	-
2019 Restated	146,727	57,165	40,430	-	-	10,796	9,171
2019	107,674	78,185	51,170	-	-	9,470	10,803

The written premium for the largest territories is largely in line with the prior period, with mix changes for the territories with lower exposures.

In the prior year, the company accepted the reinsurance risk for Aetna International business in Thailand and in 2020, the international plans were migrated to the company's related party in the CVS Group, Aetna Health Insurance Thailand. The reduction to written premium for Kuwait relates to one large government scheme, which switched to a self-insured basis in November 2020.

A.3 Investment Performance

The Group's invested assets are owned by AICL.

All assets are invested in a manner that ensures the security, quality, liquidity, and profitability of the portfolio. AICL maintains assets to match its policyholder liabilities. The AICL Board has outsourced the management of its investments to the CVS Group Treasurer which manages its investments in accordance with the AICL Board approved risk parameters and liquidity requirements. This places emphasis on low risk (minimum rating A-) and highly liquid assets with minimum appetite (less than 10% of total invested assets) for higher risk equity type investments. The AICL Board has approved a target 50:50 mix for invested assets in government bonds and commercial paper or corporate bonds with minimum credit rating of A-, and the weighting of the invested assets in commercial paper and corporate bonds is 40% (2019: 43.3%).

The assets held by AICL in its investment portfolio as at 31 December 2020 (with those held as at 31 December 2019 for comparison) are listed in the table below:

Summary Invested Assets	2020 $000	2019 $000
US Government Bonds	70,006	69,264
Singapore Government Bond	48,731	41,844
Commercial Paper and Corporate Bonds	65,004	84,620
Cash Deposits	51,119	18,186

The value of assets under management is affected by asset and currency performance. Investment income comprises interest, realised gains and losses on investment and unrealised gains and losses. Movements are recognised in the profit and loss account in the period in which they arise. Interest is accounted for on a time proportion basis using the effective interest method.

The table below provides an overview of the income and expense arising from the Group's investment assets:

TA3.2 Investment return – Bonds	2020 $000	2019 "Restated" $000	2019 $000
Interest Income	4,000	4,539	4,539
Net gains on financial investments	1,116	2,846	2,199
Investment return – Bonds	**5,116**	**7,385**	**7,057**

The investment return reflects the conservative strategy adopted by the Board and the low yield reflects the current interest rate environment. The income on the invested assets decreased as maturing bonds were replaced with lower coupon bonds. The investment strategy was reviewed with the Board during 2020 and no changes were made to the target investment allocation, which allow 50% of the investments to be placed in corporate bonds or commercial paper, with the balance retained in government bonds.

The cash on deposit is placed on a very low yield basis, allowing for cash to be withdrawn on demand. Interest earned in the period was $72k (2019: $319k).

Other assets and liabilities held in currencies other than the reporting currency, USD, are subject to foreign currency revaluation changes when valued in the reporting currency. The foreign currency unrealised gains included in the total financial return was $1,144k (2019: $878k) with the FX gain mainly attributable to revaluation of the Singapore Branch assets and liabilities.

The total financial income is shown in the table below:

TA3.3 - Total Financial Income Return	2020 $000	2019 $000
Invested Assets	5,116	6,738
Cash at bank	72	319
Other assets/liabilities - Foreign Currency Retranslations	1,143	876
Total Financial Income Return	**6,331**	**7,933**

A.4 Performance of Other Activities

The Group's only activities during the Reporting Period have been insurance and related activities through its subsidiaries, AICL and AGBUK.

In addition to AICL's premium, AICL charges administration fees for premiums paid by instalment and the administration fees received in the Reporting Period were $245k (2019: $195k).

Operating costs for the Group include operating costs incurred by AGBUK and administration expenses directly incurred by AICL, including audit and banking fees. The administration costs retained by the Group are shown net of intra-group management fees ($27,357k) recovered from AL&C.

The table below provides an overview of these costs for the Reporting Period (and a comparison with the year ended 31st December 2019):

Total Costs Summary	2020 $m	2019 $m
Acquisition costs	35,673	31,394
Administration costs	92,858	94,471
Costs recovered from AL&C	- 27,357	- 26,388
Net Costs	**101,174**	**99,477**

The acquisition costs have increased year on year due to a change in business mix, where one large scheme written in 2019 with no external acquisitions switched to an administration scheme in 2020 (no written premium) and was replaced with new business sold through brokers. The effective acquisition cost rates relative to business written via external advisors is constant between 2019 and 2020.

The total recurring costs for the service company have reduced between 2019 and 2020 with some reductions due to restricted travel and lower office consumable costs during lockdown periods. In addition, there were reductions to internal costs to offset against direct costs incurred with migration of services to a third-party administrator in the United Arab Emirates. The agreement to transfer some administration services and claims processing was signed in 2019, with the migration of services for risks located in the United Arab Emirates taking full affect in 2020.

The Group has maintained a cost-plus methodology for charges between related parties in the Aetna Inc. Group, which includes the adoption of cost-plus methodology for services provided by AGBUK. The table above reflects the increased investment in AGBUK and the recovery of costs from AL&C.

No dividends were paid during the Reporting Period (2019: $nil).

A.5 Any other information

COVID-19

The Coronavirus Disease 2019 ("COVID-19") pandemic is continuing to have an impact on the global economy, with businesses experiencing reduced customer traffic and, where governments mandated, temporary suspension of traffic and some public facilities. The adverse impact for the Company was mostly realised in slower growth for 2020, which was offset by strong customer retention, lower medical claims costs and no increase to credit risk as customers continue to settle their premiums within agreed credit terms.

The COVID-19 pandemic continues to evolve. The Company believes COVID-19's impact on the Company's business, operating results, cash flows and/or financial condition primarily will be driven by the geographies impacted and the severity and duration of the pandemic; the pandemic's impact on the global economies and consumer behavior and health care utilization patterns; and the timing, scope and impact of stimulus legislation as well as other governmental responses to the pandemic. Those primary drivers are beyond the Company's knowledge and control. As a result, the impact COVID-19 will have on the Company's business, operating results, cash flows and/or financial condition is uncertain, but the impact could be adverse. COVID-19 also may result in legal and regulatory proceedings, investigations and claims against the Company.

There is no other material information to report in relation to the Company's business and performance during the Reporting Period (save as otherwise covered elsewhere in this report).

B. SYSTEM OF GOVERNANCE

B.1 General Information on the System of Governance

Spinnaker Board

Spinnaker's Board of Directors is responsible for the governance of Spinnaker. The Board is comprised of two directors:

- Mark Howe - he is the Group CFO for Aetna International.
- Damian Connolly – he is the General Counsel and Company Secretary for Aetna International.

The Spinnaker Board does not have any sub-committees.

Spinnaker's Board of Directors is responsible for the governance of Spinnaker. However, the governance processes of the Group principally exist within AICL as the sole Solvency II insurance company within the Group and the main operating company within the Group. These are detailed further below. The main source of income for AGBUK is the fees earned for administrating the AICL business. The AICL governance process includes oversight of AGBUK's activities as its service company. Notwithstanding, AGBUK's board of directors are responsible for and oversee its activities.

The AICL Board, its sub-committees and executive management

The Board has overall responsibility for ensuring that it has an effective system of governance. It is responsible for overseeing the conduct of AICL's business and supervising the executive team which is responsible for its day to day management. The Board manages its affairs in accordance with the constitution of AICL, its terms of reference and the legal & regulatory framework in which AICL operates. The Board was comprised of six directors as at 31 December 2020: three non-executive directors and three executive directors, as well as the company secretary.

The Board has delegated certain of its responsibilities directly to the executive management team and its sub-committees. During the Reporting Period, there was one Board sub-committee with terms of reference which set out its roles and responsibilities:

- **Audit & Risk Committee**

  The committee has responsibility for the oversight of AICL's financial reporting process, its audit process, its system of internal controls, compliance with laws & regulations and risk exposure (including determining risk appetite and tolerance).

  The finance, compliance, risk management and internal audit functions all provide quarterly updates on their activity to this committee.

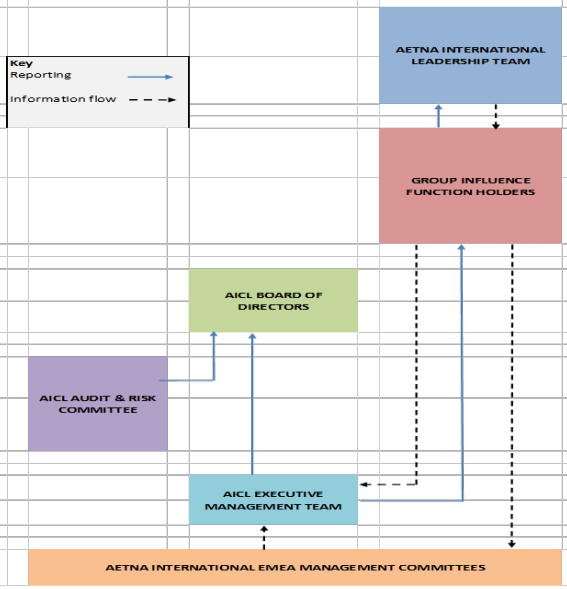
- **Executive Management Team**

  During the Reporting Period, AICL's executive management team was comprised of the Chief Executive Officer, the Chief Risk Officer and the Chief Finance Officer. They had overall management accountability for the day to day business of AICL and were responsible for reporting on such matters to the Board & its sub-committees. The executive management team are supported by three functional committees (Sales and Marketing, Operations and Finance, Compliance & Risk) which facilitate process management, awareness and appropriate governance amongst the key functions of the business.

AICL's executive management team remain directly responsible for implementing any group strategy at the company level and decisions with respect to how the company should conduct its UK regulated business.

An overview of the key functions of AICL and its key function holders (including their respective company reporting lines) is shown in the diagram on the next page.

CORPORATE GOVERNANCE STRUCTURE AND INTERACTION WITH GROUP



AETNA INTERNATIONAL LEADERSHIP TEAM	* Led by the Aetna International Chief Executive, Richard di Benedetto, who is accountable to and reports to the CEO of the CVS Group in respect of the activity of Aetna International and its group strategy * AI EMEA RGM (David Healy) is a Group Influence Function Holders (SMF7) and a member of International Leadership Team * The International Leadership Team sets and monitors the strategy for the Aetna International * It has strategic and operational committees established to support Aetna International strategy
GROUP INFLUENCE FUNCTION HOLDERS	*AI EMEA RGM (David Healy) is a Group Influence Function Holders (SMF7) and a member of International Leadership Team * EMEA RGM is responsible for reporting to the International Leadership team on EMEA business activity and relaying group strategy to his direct reports * AICL Chief Executive Officer (Damian Lenihan) ("CEO") reports into EMEA RGM
AICL BOARD OF DIRECTORS	* Duties and responsibilities set by terms of reference and UK legal/ regulatory framework * Meets quarterly * Currently comprised of 3 executive and 3 non-executive members * Oversee the conduct of the company's business and supervision of management * Agree and monitor strategy within the Aetna International Group strategy parameters
AICL AUDIT & RISK COMMITTEE	* Duties and responsibilities set by terms of reference and UK legal/ regulatory framework * Meets quarterly * Currently comprised of 3 independent non-executive members * Oversight of financial reporting, audit/ auditors (external and internal), compliance, internal controls and risk management * Chair of Committee reports to the Board * Compliance, Risk Management and Internal Audit functions report to this committee on a quarterly basis
AICL EXECUTIVE MANAGEMENT TEAM	* Overall management accountability for AICL * Responsible for implementing company and Aetna International Group strategy in UK * Comprised of the company's CEO, CFO and CRO * Responsible for reporting to AICL Board (and its sub-committee)
AETNA INTERNATIONAL EMEA MANAGEMENT COMMITTEES	
EMEA SALES, MARKETING & ACCOUNT MANAGEMENT COMMITTEE	*Meets 8 times per year *Develop Aetna International EMEA sales strategy *Review progress vs. targets and financial review vs. earnings *Pipeline and retention management activity *Alternative distribution initiatives and updates *Proactive management and planning for product development *Composition includes EMEA RGM, CFO, CEO, CRO and representatives from sales, operations, underwriting,
EMEA LEGAL, AUDIT, RISK & COMPLIANCE COMMITTEE	*Meets bi-monthly *Oversees and approves the region-wide risk & compliance management practices *Identify and evaluate the EMEA's principal operational, business and compliance risks, including the company's risk management framework and the policies, procedures and practices employed to manage risks, and the region's ethics and compliance programs *Composition includes EMEA RGM, CRO and representatives from legal, compliance and internal audit
EMEA EXECUTIVE - BUSINESS PERFORMANCE FORUM	*Meets monthly *Review financial reporting *Provide oversight of the finance function within EMEA *Management of expenses versus budget and delivery of cost control initiatives *Report on financial performance and regulator issues to the International Leadership Team on a monthly basis *Composition includes EMEA RGM, CFO, CEO, CRO and representatives from sales, operations, underwriting, marketing and product
EUROPE CREDIT CONTROL COMMITTEE	*Meets twice a month *The purpose is to ensure all debts are collected in a timely manner to reduce credit exposure and improve cash flow *Escalation point for any issues relating to invoicing or delays in collections *Reviews Accounts Receivable Reports *Composition includes CFO, CEO, CRO and representatives from sales, operations and finance
UNDERWRITING COMMITTEE	*Meets monthly *Provides management oversight and risk analysis of the execution of underwriting strategy against plan * Mixture of Quarterly Deep Dives on actions/trends and spotlight meetings giving high level updates/ key issues driven by regional requirements *Composition includes, inter alia, EMEA RGM, Chief Underwriting Officer, Central Underwriting KFH, CFO, CEO and Head of Operations

Remuneration policy and practices

As noted above, the only company within the Group which has employees in the UK is AGBUK. AGBUK's employees principally service the activities of AICL.

The CVS Group establishes the remuneration policy for all employees within its group of companies (including AGBUK), which includes a mixture of fixed pay and bonus incentives.

The CVS Group Human Resource function completes market research for CVS Group employees to set bench marked pay ranges for fixed pay. The market review also reviews additional market-based benefits which can be added to the basic compensation package.

The CVS Group offers defined pension contributions for employees and the contribution rates are set based on market research. The bonus incentives are linked to personal performance and the performance of the CVS Group. Funding for bonus awards is approved by the Board of Directors of Aetna Inc. The performance of AICL is included in the total performance calculations for determining bonus funding approved by the CVS Group and there are no incentives directly linked specifically to the performance of AICL or any other companies within the Group.

The Chairman and Chief Executive Officer of AICL meet on an annual basis to review the CVS Group remuneration policy to ensure it is appropriate for the company.

Material transactions with Shareholder

The Spinnaker Group remains sufficiently capitalised to meet its growth targets and maintain its solvency position. Consequently, there were no additional capital contributions in the period.

Assessment of Corporate Governance Structure

The governance structure has been designed to ensure that management can provide the necessary oversight of the business and make decisions, whilst also supporting the responsibilities of the AICL Board. The AICL Board has clearly defined responsibilities and delegated authorities to its sub-committees.

The CVS Group sets the broad business strategy for the Group. The AICL Board reviews AICL's strategy and annual business plan, which is prepared by the executive management team taking into account the broad strategic direction from the CVS Group.

The AICL Board scrutinises the strategy and business to assess its risk and benefits and determine if its implementation is in accordance with:

- the company's risk appetite
- the company's short term and long-term strategy
- the company's legal and regulatory responsibilities; and
- the fair treatment of the company's policyholders.

The governance structure provides a mechanism for the company to anticipate and respond to potential changes in the business environment or its risk profile in an appropriate amount of time. The risk management structure integrates risk assessment into the strategic and business planning cycles, which enables AICL and therefore the Group (including its other subsidiaries) to maintain a manageable risk profile.

B.2 Fit and proper requirements

The Group has a robust recruitment process and performs appropriate employment checks on all employees operating within its subsidiaries. This is overseen by the Human Resources team with relevant senior management.

In accordance with UK regulatory requirements, AICL has a documented procedure for ensuring that all senior management functions (**"Key Function Holders"**) are, and remain, fit and proper in accordance with UK regulatory requirements.

In assessing whether a person is fit and proper to be a Key Function Holder, AICL considers the following regulatory prescribed criteria in relation to that person:

a) personal characteristics (including being of good repute, honesty, integrity and financial soundness)
b) the level of competence, knowledge & experience
c) qualifications and professional standards; and
d) the training undertaken or to be undertaken by that person.

In relation to (a) and (b), AICL looks for evidence that the person has:

- appropriate qualifications
- experience and knowledge in insurance and financial markets
- an understanding of AICL's business strategy, business model and system of governance
- an understanding of financial and actuarial analysis (to the extent applicable)
- knowledge of the legal and regulatory framework and requirements applicable to AICL and its business; and
- the ability to adequately support the sound and prudent management of AICL.

The above criteria are assessed prior to the person's appointment as a Key Function Holder through self-assessment questionnaires, interviews with the Human Resources team, senior management and third-party background checks (covering employment references, criminal records checks, credit checks and academic/professional body checks), as appropriate to the function concerned.

Once appointed, the person is subject to periodic fitness and propriety checks by AICL. This fit and proper process and the appointment of Key Function Holders is overseen by the AICL Board.

As indicated above, any other employees operating within the key functions of AICL's business will be subject to a robust recruitment process and appropriate employment checks. This is overseen by the AICL Chief Executive Officer in conjunction with the Human Resources team.

B.3 Risk Management System including the Own Risk and Solvency Assessment

Risk Management Function and System

The Group has adopted the risk management framework of AICL given that the primary activity of the Group is the insurance underwritten by AICL. As noted above, in addition to AICL, the other material entity within the Group is AGBUK, which services the insurance business underwritten by AICL and its risks are therefore inherently linked to AICL. The Spinnaker Board of Directors is satisfied that the risk management framework adopted by AICL is appropriate for managing the risks of the Group as a whole. The Group CFO ensures that the AICL risk management framework appropriately considers risks at the AICL and Group level.

The AICL Board delegates oversight of the risk management system to the AICL Audit & Risk Committee. The Group CFO is responsible for discharging, managing, and the day to day oversight of AICL and the Group's risk management function, including reporting to the AICL Audit & Risk Committee in respect of the same. The risk management function is responsible for the implementation of the Group and AICL's risk management system.

The AICL Audit & Risk Committee has approved the implementation of a risk management system to identify, measure and track risk indicators for AICL and the Group. The risk management system includes a risk appetite statement, risk register, risk tolerances and a risk scorecard for monitoring performance against qualitative and quantitative tolerances. The Group CFO chairs the management risk committee, which meets regularly to review business performance metrics, business developments and other material changes which could impact the risk profile of the business.

The risk management function presents quarterly risk updates to the AICL Audit & Risk Committee, which includes:

- executive summary of the business issues reviewed by the management risk committee
- risk scorecard summary
- risk tolerances summary
- solvency capital summary; and
- an overview of the risk management process.

The Group's risk management ("**RM**") process as managed by AICL can be summarised using the following diagram:

Own Risk Solvency Assessment ("ORSA")

Process

The Spinnaker Board is responsible for the Group ORSA. The Spinnaker Board has considered the risk profile and activities of the Group and is satisfied that the material risks of the Group arise from the insurance activities of AICL and AGBUK through its support of the insurance business of AICL and the Group. The Group ORSA notes the reliance on the AICL risk management process and the AICL ORSA for managing the material risks in the Group.

The AICL ORSA process which encompasses the ORSA process adopted for the Group is described in detail below.

The ORSA is a forward-looking risk assessment of all of AICL's material risks in the context of its business strategy and risk appetite, in order to determine current and future solvency needs of the business. AICL's ORSA process is governed by its ORSA policy, which describes the purpose, process and governance over the ORSA.

The AICL Board is responsible for the AICL ORSA and ensuring that it is performed in accordance with the ORSA policy and applicable law and regulation.

The ORSA process is coordinated by the Group CFO and the risk management function. The objective of the ORSA process is to assess its capital adequacy in light of its assessment of its risks and the potential impacts of its risk environment and enable it to make strategic decisions.

The risk management cycle and reporting to the AICL Audit & Risk Committee supports the objectives of the ORSA by presenting regular updates on the company's risk profile. The risk scorecard is used to track emerging risk issues that impact the company's ability to manage its solvency capital. The tracking includes new business opportunities which could trigger requirements for additional capital.

The key risk assurance functions which provide updates to the AICL Audit & Risk Committee as part of the ORSA process are:

- the risk management function which manages the ORSA process and its outputs, which identifies the key risks; and
- the actuarial function which runs tests on the company's balance sheet, for capital adequacy and produces the resultant output.

The AICL Board reviews the report following completion of the ORSA process and considers the need for any management actions to be incorporated into the final ORSA report, such as:

- assessment of the appropriateness of the Solvency II Standard Formula for determining the Solvency Capital Requirements of the company
- review of the company's solvency capital calculations and scenarios
- decisions in relation to its capital
- reassessment of the company's risk profile and appetite
- additional risk mitigation actions; and
- reassessment of the company's investment strategy.

The results and conclusions contained in the final ORSA report and the AICL Board's resultant actions and decisions, are communicated to all relevant staff, including outsourced control functions, once the report has been considered and approved by the AICL Board.

Frequency

The ORSA process is repeated and an ORSA report prepared annually or earlier when certain material trigger events occur, as decided upon by the AICL's Audit & Risk Committee in concert with the AICL Board and in accordance with the ORSA policy.

Interaction of solvency and capital management with risk profile

The capital management process monitors the capital requirements for AICL and the Group on a quarterly basis. As part of this, the risk management function prepares risk scorecard summaries, which include tolerances for monitoring the Own Funds available to meet AICL and the Group's Solvency Capital Requirement and Minimum Capital Requirement.

The solvency monitoring is reviewed under the capital management process so that any changes in business circumstances or its risk profile can be tracked for additional capital requirements.

AICL determined that the Solvency II Standard Formula would be used to calculate the required solvency capital and to assess the overall solvency needs. AICL administers a mono-line product with a short tail risk and the Solvency II Standard Formula is appropriate for the level of complexity in the AICL's business. The AM Best capital model was also used to check capital requirements and the capital assessment under this model was slightly lower than the capital requirements under the Solvency II Standard Formula.

B.4 Internal Control System

Group Internal Control System Overview

The Board of each company within the Group is responsible for implementing internal controls which are appropriate and proportionate to its business, its legal and regulatory obligations and the risk which it poses to the Group as a whole. Within each company there will always be a minimum level of reporting to the Board and accounting procedures to enable compliance with applicable company law and to provide appropriate oversight of the business undertaken.

The primary focus of the Group internal control system is in respect of its UK regulated entities, AICL and AGBUK, which carry on insurance business and insurance mediation respectively. The structure of the AGBUK internal control system largely follows that of AICL with differences to reflect that it is an insurance administrator and service company acting principally for AICL. We have outlined below the AICL internal control system.

AICL Internal Control System Overview

AICL operates a "three lines of defence" internal control system:

First line – Business Controls

The AICL Board owns and manages the risks of AICL and has responsibility for AICL's compliance with the requirements associated with the legal and regulatory environment in which it operates.

The AICL Board has implemented systems and controls, including appropriate internal policies and procedures, to comply with such requirements and to manage risks and monitor these alongside the development of its business strategy. The AICL Chief Executive Officer has been delegated responsibility by the AICL Board for management of compliance with business controls and is responsible for reporting on such matters to the AICL Board and its sub-committees.

Second line – Internal Control Functions

The compliance and risk management functions form the second line of defence to ensure that the company has an effective risk management control system. Further detail on the company's compliance function is provided below.

Third line - Internal Audit function

The internal audit function forms the final layer of the internal control system and is an independent and objective function which is ultimately responsible for providing the AICL Board with assurance that the company has effective internal controls. Further detail on the AICL's internal audit function is provided in Section B5 below.

Compliance Function

The Compliance Function is responsible for:

- ***Compliance Risk Monitoring***

The Compliance Function identifies, assesses, monitors and reports to the Board (via the Audit & Risk Committee) on AICL's compliance risks (including the risk of it incurring legal and regulatory sanctions, significant financial loss, significant strategic or operational disruption, significant policyholder detriment or damage to reputation as a result of AICL's failure to comply with applicable laws and regulations). This includes reporting on any material non-compliance by AICL with such measures and/or any applicable law and regulation.

- ***Supporting the implementation of legal & regulatory changes and internal controls***

The Compliance Function assists the business with the implementation of controls to address changes in the legal and regulatory environment and manage compliance risk. This includes advising the Board on AICL's compliance with the rules and other laws, regulations and administrative provisions adopted in accordance with the PRA Rulebook for Solvency II firms.

- ***Regulatory reporting and correspondence***

The Compliance Function coordinates and oversees the preparation and filing of non-finance related regulatory reports, non-product filings and correspondence with AICL's regulators.

The Chief Compliance Officer is responsible for discharging, managing and overseeing AICL's Compliance Function. He or his delegate reports to the Audit & Risk Committee on compliance matters on a quarterly basis – this includes details of any material compliance breaches and any corrective action undertaken in the previous reporting period.

The Compliance Function also provides updates on compliance activity at monthly Finance, Risk and Compliance management committee meetings, which are comprised of senior management and individuals from other key functions.

The Compliance Function also has a reporting line into the AICL Chief Executive Officer in respect of day to day compliance matters. It otherwise operates independently from the business teams of the company as a second line of defence and the Chief Compliance Officer has a separate group reporting line into the Chief Ethics and Compliance Officer of Aetna Inc. This ensures that the compliance function is an effective and impartial compliance risk governance operation.

There is a compliance policy which is due for review annually and approved by the AICL Board. The Chief Compliance Officer is responsible for this policy and ensuring that it is implemented. The AICL Board ensures that the compliance function has the necessary access to all personnel (including third parties whom the company deals with), systems and records in order that it can perform its role in full support and adherence of the compliance policy.

B.5 Internal Audit Function

The internal audit function of AICL is responsible for providing its Board with independent and objective assurance in respect of AICL's system of governance; in particular, it assists the company in accomplishing its objectives by bringing a systematic and disciplined approach to evaluate and improve the effectiveness of the organisation's governance, risk management, internal control.

There is a dedicated internal audit team in the UK which has a primary focus on Aetna International's business and specifically covers AICL. This team forms part of the wider Aetna Inc. Group internal audit function which is headed by the Aetna Inc. Group Head of Internal Audit. The AICL Head of Internal Audit is primarily responsible for overseeing and discharging AICL's internal audit function with the support of the local internal audit team and reports to the Aetna Inc. Group Head of Internal Audit.

The AICL Head of Internal Audit and/or his delegate reports to AICL's Audit & Risk Committee on a quarterly basis. This reporting structure ensures that audit issues and action plans receive adequate consideration and effective action.

AICL's internal audit charter also provides a mechanism for the Chairman of the Audit & Risk Committee to engage directly with the head of the internal audit function, independent of the executive management.

The planning process includes management input, a review of emerging risks and professional auditor judgment. The internal audit charter for the company also provides for the Audit & Risk Committee to request ad-hoc or specific internal audit reviews for AICL, if the Audit & Risk Committee deems this necessary. The AICL Audit & Risk Committee approves the annual internal audit plan for AICL.

Results and conclusions of audit work are reviewed with operating and financial management directly responsible for the activity being evaluated and other management, as deemed appropriate. The purpose of reviewing results is to reach an agreement as to the facts presented by the auditors and to obtain management action plans to address issues. Communications include the engagement's objectives and scope, as well as applicable conclusions, recommendations, and action plans.

Once an audit is completed and results are communicated, the internal audit function follow-up to ensure that management action plans ("**MAPs**") are effectively implemented. The status of all management action plans are reported quarterly to the company's senior management and AICL Audit & Risk Committee, with specific details around any MAPs delayed past their due date.

B.6 Actuarial Function

The actuarial function's activities relate principally to AICL as the only insurance company within the Group. It provides the Group as a whole with support in relation to the Group solvency position, capital planning and risk management.

AICL's actuarial function is responsible for the following AICL and Group activities:

- co-ordination of the calculation of technical provisions. This consists of assessing the sufficiency of the provisions, assessing the uncertainty in the estimates and justifying the differences between successive periods
- reviewing the appropriateness of the models and assumptions, considering the sufficiency and quality of data, and interpreting deviations of best estimates against experience. There is also a requirement to consider the verifiability of assumed management actions
- providing opinions on underwriting policy and reinsurance arrangements
- contributing to the effective implementation of the risk management system of the company. In particular:
    - in relation to the Solvency Capital Requirement ("**SCR**") and Minimum Consolidated Group Solvency Capital Requirement ("**MCGSCR**"), the company's Chief Actuary reviews the output of the model used by AICL to calculate the SCR and MCGSCR. Specifically, any perceived or possible inconsistencies or issues identified in the model results are raised; and
    - the Chief Actuary approves the preparation of the ORSA presented to AICL's Audit & Risk Committee in conjunction with the risk management function.

The Chief Actuary is responsible for discharging, managing and overseeing the actuarial function. In addition to ad-hoc updates to the AICL Board and Audit & Risk Committee (as may be required from time to time), the Chief Actuary is required to produce an annual report for the AICL Board. This report covers all of the information necessary for the AICL Board to form its own opinion on the adequacy of technical provisions and on the underwriting and reinsurance arrangements of the company.

B.7 Outsourcing

The Group outsources and enters into outsourcing arrangements only where there is a sound commercial basis for doing so, and where the risk can be effectively managed. A due diligence process is undertaken prior to any final decision being made as to whether to outsource a material business activity. This addresses all material factors that would impact on the potential service provider's ability to perform the business activity.

The Group has appropriate policies with respect to the outsourcing of activities to third parties and the due diligence which should be undertaken before contractual arrangements with third parties are confirmed. AICL has established an Outsourcing Policy setting out the requirements for identifying, justifying and implementing material outsourcing arrangements in accordance with its Solvency II obligations. This Policy has been adopted by AICL and covers the following:

- definition of outsourcing
- risk mitigation strategies
- Board and management responsibility
- internal control procedures
- due diligence
- business continuity management
- contractual agreements
- management and control of the outsourcing relationship; and
- final approval.

AICL's outsourcing arrangements are subject to an annual review and a report with any findings from that review are presented to the AICL Board.

The table on the following page details the critical or important operational functions the Group (and in particular AICL) has outsourced together with the jurisdiction in which the providers of such functions or activities are located.

Outsourced Provider	Service Outsourced	Intra-Group/ Third Party	Jurisdiction	Outsourcing Manager
Aetna Global Benefits (UK) Limited	Operations (including claims management Sales Actuarial Finance Underwriting Internal Audit Risk Management Legal Compliance Tax Information Technology and Infrastructure	Intra-Group	United Kingdom	Chief Executive Officer/ Chief Finance Officer
Aetna Life Insurance Company	Investment Management	Intra-Group	United States of America	Chief Finance Officer
PWC	Tax compliance services	Third Party	United Kingdom	Chief Finance Officer
HGS	Claims processing	Third Party	India	Chief Executive Officer
Genpact	Call Centre	Third Party	Manila	Chief Executive Officer
Microsoft	Cloud services (Azure) for information systems, networking & disaster recover.	Third Party sub-contractor	UK	Aetna International IT Director - Dan Veitch

Note: Intra-Group for the purpose of the above table means transactions between any related party in the CVS Group and not just related parties within the Spinnaker Solvency II Group.

B.8 Any other information

Each company in the Group has assessed its system of governance and has concluded that it effectively provides for the sound and prudent management of their business and that it is proportionate to the nature, scale and complexity of their operations.

There were no material changes to the system of governance of the Group during 2020 (save as those noted elsewhere in this report).

C. RISK PROFILE

Risk management objectives and risk policies overview

<u>Group Risk Management</u>

The Board of each company within the Group is ultimately responsible for its risk management and ensuring that it is appropriate and proportionate to its business, its legal and regulatory obligations and the risk which it poses to the Group as a whole.

AICL has a risk management framework which is used for the Group as a whole and is described in some detail below.

In addition, AICL completes the Group solvency calculation and monitors Group solvency on behalf of Spinnaker and liaises with the Spinnaker Board as necessary to ensure the Group SCR is met and that risks to the Group solvency are monitored and managed.

The Board approves the use of the Standard Formula to calculate the level of risk margin required to manage the key risks. A quantitative analysis of the risk margin required for each key risk is shown in the table below, with comparative figures for the prior year.

SCR Calculation	2020 $000	2019 $000
Market Risk	32,179	34,159
Default Risk	13,849	22,668
Health Risk	52,418	50,791
Diversification	(24,933)	(29,575)
Basic Solvency Capital Requirement	**73,513**	**78,043**
Operational Risk	9,791	9,852
SCR	**83,304**	**87,895**
Surplus Solvency Margin	127,440	103,392
Total Eligible Own Funds after restriction for Singapore RFF	**210,744**	**191,287**
SCR Ratio	253%	218%
Minimum Solvency Requirement	20,310	22,310

AICL Risk Management System

AICL is exposed to a variety of risks when undertaking its activities. The AICL Board has policies in place to identify and manage the key risks in accordance with its risk appetite. The key risks that AICL is exposed to are as follows:

- underwriting (insurance) risk
- market risk
- credit risk
- liquidity risk
- operational risk; and
- Regulatory risk and capital management

The following sections outline AICL's views on each of these risks and the measures and controls in place to manage them.

C.1 Underwriting Risk

AICL experienced a slight reduction in the period, where although retention rates were strong, new business opportunities were impacted by the Coronavirus pandemic. Targeted renewal increases were achieved to cover expected medical cost inflation. The business accepted was in line with the Company's underwriting protocols and underwriting risk appetite.

The key elements of the Company's insurance risk management framework are its underwriting risk, reserving risk, reinsurance risk and lapse risk.

Underwriting strategy

AICL's underwriting strategy is to maintain and grow a balanced portfolio of international private medical insurance contracts with an appropriate spread of risk which will yield a targeted return on risk capital for its shareholders.

Underwriting direction is established during the annual business planning process, when the upcoming underwriting year's target portfolio is structured. The strategy, and associated business targets, is communicated to business managers and appropriate underwriting authorities and controls implemented to ensure the desired risk profile is achieved. Adherence to underwriting guidelines and authorities is achieved through monitoring and review controls established by the executive management team.

Premium Risk Premium risk arises from the failure of pricing strategies. It encompasses the risk of loss due to the potential timing, severity and frequency of covered claims differing from the assumptions at the time the risk was underwritten and priced.	**Reserve Risk** Reserve risk arises from failing to set sufficient cash reserves to cover the uncertainty surrounding the timing, frequency and severity of claims costs.
Catastrophe Risk Catastrophe risk arises from the failure to manage risk aggregation or accumulation that may result in an increased exposure to catastrophe losses.	**Lapse Risk** Lapse risk reflects the risk of loss, or of adverse change in the value of insurance liabilities, arising from the discontinuation of a policy.

Further review of the portfolio, its composition and yield, is formally undertaken by the AICL Board. The short tail nature of international private medical insurance results in the ultimate expected losses associated with a given insurance contract, or portfolio of contracts, being known within a relatively short timeframe after conclusion of the associated contract indemnity term.

Reserving risk

To manage reserving risk and ultimate reserves risk, management employs a number of techniques to monitor premium and claims development patterns. An external independent actuary also performs an annual review of the AICL claims reserves.

The objective of AICL's reserving policy is to produce accurate and reliable estimates that are consistent over time.

Reinsurance strategy

AICL has structured a reinsurance program that is designed to reduce the impact of adverse loss experience on equity to a tolerable level. The Company is exposed to the risk of adverse loss experience on a frequency and severity basis and has structured its reinsurance program to appropriately respond to such risks in both individual and catastrophic loss scenarios.

The existing reinsurance program restricts AICL's losses per claim to a maximum of $250k. AICL only contracts with reinsurers that are considered to have an appropriate level of financial standing and credit worthiness, as determined by the AICL Board.

In addition, AICL is exposed to the risk that claims provisions do not meet the ultimate cost of settling claims through claims management risk and reserving risk.

Lapse risk

AICL monitors the mix of individual risk business (where premium refunds may apply for early cancellation) and group risks (where there is likely to be some claims activity resulting in no premium refund). Most of the business underwritten is group risk business and therefore the potential losses arising from early cancellations are not material.

Material changes to the measures used to assess underwriting risk

There were no material changes to the measures used to assess underwriting risk in the period.

C.2 Market Risk

Market risk is the risk that changes in market prices, such as interest rate, foreign exchange rates and prices will affect the value of AICL's assets, the amount of its liabilities and/or AICL's income.

The AICL Board approved investments parameters recognise the "prudent person principle" in relation to the management of assets held by AICL, including selection criteria to ensure the assets selected meet clearly identifiable, easily tradable, meet minimum credit rating criteria and that the market valuation can easily be verified by an independent party.

The components of AICL's market risk are shown below.

Market Risk Component	**Description**
Spread risk	The potential financial loss due to the increase in spread that an asset trades at relative to comparable government bonds.
Currency risk	The potential financial loss due from the change in currency exchange rates causing an adverse change in value of the liabilities compared to assets held.
Interest rate risk	The potential financial loss due to a reduction in value of the investment portfolio due to a change in interest rates.

Spread risk mitigation

There are investment parameters approved by the AICL Board, which focus on high quality debt instruments. The investment assets include a bias towards highly liquid, sovereign government bonds. The AICL Board reviews performance against the investment parameters and their effectiveness on a quarterly basis and the investment parameters are reviewed and approved by the AICL Board annually. The current investment parameters are an effective control against a market change in spread risk.

Currency risk mitigation

Management reviews the matching of assets and liabilities regularly and reports to the AICL Board (who discusses the effectiveness of the mitigation) on a quarterly basis. There are no material market currency risks which require action.

Interest rate risk mitigation

Interest rate risk is the risk the unfavourable movements in interest rates could adversely impact on the capital values of AICL's financial assets and liabilities.

The investment strategy approved by the AICL Board is focused on high quality, short duration debt instruments. An analysis of AICL's invested assets is detailed in the table below:

Bonds to Maturity $000	< 3 months	4-6 months	6-12 months	Over 12 months	Total
US Government Bonds	14,606			55,400	70,006
Singapore Government Bonds	48,731				48,731
Corporate Bonds and Commercial Paper	34,682	5,338	4,033	47,568	91,621
Total	**98,019**	**5,338**	**4,033**	**102,968**	**210,358**

Whilst AICL transacts business with insureds who are domiciled in countries outside of the UK, it principally denominates its insurance contracts in USD, its functional currency.

As illustrated above AICL invests in in short term government bonds, corporate bonds and commercial paper. Since the funds are short term they are not subject to large movements from changes in interest rates. AICL does not hold any external borrowings as part of its financial liabilities profile at the balance sheet date so is not exposed to any movement in market interest rates.

The AICL Board reviews performance against the investment strategy and their effectiveness on a quarterly basis and the investment strategy is reviewed and approved by the Board annually. The quarterly monitoring of asset duration is effective for mitigating against changes in interest rates.

Any interest rate risk arising on AICL is considered to be minimal.

Material changes to the measures used to assess market risk

There are no material changes to the measures used to assess market risk in the period.

C.3 Credit Risk

AICL defines credit risk as the risk of financial loss to AICL should a counterparty fail to meet its contractual obligations.

AICL only holds investment and cash balances in accordance with the credit ratings specified in the Board approved investment parameters (which as noted earlier recognise the "prudent person principle") to mitigate the risk of financial loss from counterparty default. AICL has used credit quality steps based on ratings from its nominated External Credit Assessment Institutions ("**ECAIs**") when calculating its counterparty default risk.

AICL's investments and cash ratings are represented in the table below:

Asset Class	Credit Rating	ECAI	% Held	Solvency II Credit Quality Step
Investment Bonds	AAA	Moody	40%	1
Investment Bonds	AA	Moody	4%	2
Investment Bonds	A	Moody	5%	2
Investment Bonds	A	Fitch	1%	2
Investment Bonds	A	Standard & Poor	1%	2
Investment Bonds	AA	Standard & Poor	17%	2
Cash	AA	Moody	17%	2
Cash	A	Moody	13%	2
Reinsurance asset	A	AM Best	1%	2

An update of AICL's investments and cash ratings are presented to the AICL Board on a quarterly basis and the AICL Board monitors the effectiveness of, and compliance with, the investment parameters. The risk appetite for the range of credit ratings allowable for investments and the quarterly monitoring is effective in managing the default risk from counterparties. There were no material changes in the mix of credit ratings attaching to AICL's assets during the Reporting Period.

Policyholder receivable balances are diversified, but unrated, and are continually monitored by AICL's credit control function for impairment, with policies suspended and or cancelled in the event a policyholder breaches premium payment terms.

C.4 Liquidity Risk

Liquidity risk is the risk that AICL does not have timely access to sufficient cash reserves in order to satisfy its obligations as they fall due.

AICL's principal obligations relate to the settlement of claims arising on its insurance contracts. The nature of AICL's insurance activities is such that the profile of claims incurred follows a high frequency, low severity profile.

Such a profile lends itself more readily to cash requirement forecasting than low frequency high severity insurance lines of business such as property catastrophe, thereby reducing inherent liquidity risk.

The Aetna International Group Capital Committee monitors the solvency position of AICL and AGBUK on a quarterly basis, including forward looking solvency and liquidity forecasts. AICL's finance function forecasts cash requirements on a monthly basis and quarterly cash forecasts are reviewed with the investment manager. The forecasting process takes into account the nature and duration of technical provisions in accordance with the "prudent person principle" under Solvency II rules. The liquidity analysis on the next table, shows that AICL has cash and cash equivalents of $89,670k currently available to meet the technical provisions of $136,253k.

The level of cash retained versus cash released for investment is monitored and reported to the AICL Board. The AICL Board sets minimum cash balances to be maintained, depending on the volatility expected in the cash flow forecasts. The AICL Risk Appetite Statement includes specific measures in relation to the liquidity requirements and the liquidity risk tolerance is reported in a quarterly risk scorecard to the AICL Board.

Allied to this is AICL's strategy of investing a large proportion of insurance funds in high credit quality short duration securities, $98,019k, which provides access to substantial immediate liquidity should this become necessary.

In the discussion on stress tests in section C.6 below, AICL has considered the potential impact for any short-term volatility on premium collection and stress tested the current accounting provision for aged debts by 100%. The stress tests discussed in section C.6 also include additional volatility in claims medical costs. It is noted that 40% of the total liquid assets available to meet technical provisions are invested in AAA government bonds. Premium collection will be monitored very closely over the coming months due to possible impacts from COVID-19 on timely collection of premiums and there are sufficient liquid assets to cover liquidity requirements throughout 2021.

The table below provides details of the liquidity and duration of AICL's financial assets as at 31 December 2020:

Summary Liquidity Analysis	$000	% Total
Cash on demand	38,551	13%
Cash on deposit (redeemable within 1 month)	51,119	17%
Investment Bonds < 3 months to maturity	98,019	33%
Investment Bonds > 3 months to maturity	112,339	37%
Total	300,028	100%

Change in measures used to assess liquidity requirements

The calculation of the technical provisions only includes anticipated margin on the unwinding of future cash flows, with full provision maintained for past due premiums.

C.5 Operational Risk

Operational risk is the risk of direct or indirect loss arising from a wide variety of causes associated with AICL's processes, personnel, technology and infrastructure, and from external factors other than credit, market and liquidity risks, such as those arising from legal and regulatory requirements and generally accepted standards of corporate behaviour.

Operational risks arise from all of AICL's operations and are faced by all business entities. AICL's objective is to manage operational risk so as to balance the avoidance of financial losses and damage to AICL's reputation with overall cost effectiveness and to avoid control procedures that restrict initiative and creativity.

The primary responsibility for the development and implementation of controls to address operational risk is assigned to senior management and is overseen by the AICL Board. Compliance with AICL's standards is supported by a programme of periodic reviews undertaken by the internal audit function.

The results of internal audit reviews are discussed with the management teams, with summaries submitted to the AICL Audit & Risk Committee and senior management of AICL.

The Group CFO has considered the material operational risks identified by the AICL risk management process, including IT operations, office infrastructure and key person dependencies. The Group CFO has noted the controls in operation to mitigate against the material operational risks and is satisfied that the risk mitigation techniques are operating effectively and that there are no additional operational risks for the Group. The Group CFO also reviewed the stress testing scenarios completed for AICL, including failure of IT operating platforms, loss of key talent and the loss of Farnborough office. The CVS Group maintains strict security protocols for all hardware and software used within the Group, whereby all Group sites are subject to Group protocols in relation to the installation of IT software and IT infrastructure. The Group IT Security function operates scanning controls across all applications and software used by AICL and AGBUK. There are escalation procedures in place for any identified Cyber Threats and the Group IT Security function provides summary IT security reports to the AICL Board on a quarterly basis. The AICL Board has approved risk tolerances for the level of IT security breaches and these are included in the quarterly risk scorecard presented to the Board.

There are documented controls included in the AICL ORSA which mitigate against the loss of operations for these key risks. There are documented procedures for the key controls and monitoring processes.

Under the reverse stress tests documented in the AICL ORSA, the most extreme and unlikely event to impact the operations of AICL, would be if the CVS Group was unable to continue operations. A secondary event which could disrupt operations would be a major incident at the Farnborough office. However, the disruption caused by such an event would be reduced by activating the business continuity plan, which is regularly tested and documented.

There were no material changes to AICL or the Group’s outsourcing risk profile during the period.

C.6 Stress Testing and Sensitivities

The Group has considered the material risks to which it is exposed and has performed stress and scenario testing of the material risks to which it is exposed within the AICL entity. AICL has sufficient Own Funds to meet its SCR. There are no realistic stress scenarios that could bring AICL's Own Funds below its SCR and AICL is more than adequately capitalised to absorb losses.

AICL also completes reverse stress tests on an annual basis to examine the conditions that would render AICL's business model unviable

The table below provides summary details of the stress and scenario testing completed:

Type of Test	Risks Covered	Timeline
Stress & Scenario Testing:		
Business Planning	Material risks over 1-year planning period	Annually
	Material risks over 3-year planning period	Annually
Strategic Planning	All risks	Annually
Risk specific	Liquidity risks	Monthly
	Operational risks	Monthly
	Underwriting risks	Monthly
	Market risks	Quarterly
Reverse Stress Testing:		
Business Planning	Solvency & Capital	Annually
	Liquidity	Annually
Strategic	Strategic & reputational	Annually

In order to monitor the severity and impact of material risks on AICL, the stress tests detailed in the table below were included as part of AICL's ORSA:

Material Risks	Stress Scenario	Projected SCR $'000	Projected Own Funds $'000	Projected Solvency Coverage %	Change in SCR (from base)	Change in Surplus Own Funds (from base)	Mitigating Management Actions
Base	Base position	87,702	197,840	226%	-	0	
Underwriting Risk	Unexpected increases to medical claims volumes and/or medical claims costs results in **5%** deterioration to the loss ratio, impacting own funds and the Health Underwriting Risk SCR	88,398	179,885	203%	695	(18,650)	Robust and frequent monitoring: - monthly performance monitoring - quarterly forecasts of financials including renewal and new business volumes, premium rate increases and claims experience - detailed analysis to support annual pricing reviews
Market Risk	Increased value of AED/USD foreign currency mismatch amounting to two months' worth of AED premiums (decrease in AED assets) increases currency risk in the SCR. Even though AED is pegged to USD, the SCR assumes currency matching benefit can only be obtained for Euro pegged currencies.	91,233	197,840	217%	3,530	(3,530)	All foreign currency exposures and the timing of foreign currency settlements are monitored to ensure net exposures are maintained at target levels
Credit Risk	Delays in receipt of premiums, increasing the total premiums receivable by $12m (with the entire increase amounts allocated to amounts owed for over 3 months) increases Counterparty Default Risk	93,399	197,840	212%	5,697	(5,697)	Existing Credit controls operate to mitigate risk: - monthly credit control reviews - escalation of management reviews for larger debts - engagement with customers
Liquidity Risk	Liquidity stress requires AICL to convert $20m of financial investments to cash, reducing interest rate and spread risk and increasing counterparty default risk	88,164	197,840	224%	461	(461)	Existing credit controls maintained to ensure premiums collection cycle in line with liquidity management forecasts
Total	**Aggregate of Stress Scenarios**	**98,036**	**179,885**	**183%**	**10,334**	**(28,289)**	**Own Funds surplus is enough to maintain solvency margin**

The test results were performed using business planning data from the 2021 business plan originally prepared in quarter 4 2020. The assumptions in the 2021 business plan and the actual results shown in Sections D&E below have been defined as the base position for the stress testing.

In addition to the stress tests completed above, AICL also identified circumstances that could potentially render its business model unviable, including the effects of the failure of the parent company and the impact of significant operational failures or regulatory interventions on the business that could result in business failure. There were no results creating additional actions for AICL or the Group.

C.7 Regulatory risk and capital management

Regulatory risk is the risk that the Group breaches the requirements of local regulatory bodies, most notably the Prudential Regulation Authority (PRA) and the Financial Conduct Authority (FCA). The company mitigates this risk through the effective operation of defined governance structures and effective capital management. The Group is required to hold sufficient capital to comply with the capital requirements applicable to Solvency II firms under the PRA rulebook. The Group has complied with these capital requirements throughout the period. Management also carries out its own assessment of the level of capital resources it regards as appropriate in excess of these regulatory minima.

C.8 Other Material Risks

Brexit

With effect from the 1st October 2020, AICL commenced the migration of approximately 10% of its portfolio to its sister company incorporated in Ireland, Aetna Health Insurance Company of Europe DAC. This migration will ensure that Aetna's EEA customers are underwritten by a company authorised in the European Union post Brexit. The Group has already invested capital in the Irish company to support the migration of risk from the Company. The remaining portfolio in AICL will not be directly impacted by Brexit.

Covid-19

The Group continues to actively monitor the impact of the Covid-19 virus. The Group have implemented a policy for staff to work at home and these arrangements were tested before the policy was implemented.

AICL has reviewed its underwriting practices to make sure all risks continue to be accepted in accordance with its underwriting risk appetite. AICL has considered potential impact to claims costs but does not anticipate any material impact to the Solvency surplus at this time.

There may be some impact for AICL's customers and AICL will continue to regularly assess any potential impact to expected business growth and liquidity. However, it has noted that cash collection was strong in 2020 as customers with no material increase in the credit risk for premiums past due

C.9 Other material information

The information presented in Section C represents the Company's risk profile. There is no other additional information to disclose.

D. VALUATION FOR SOLVENCY PURPOSES

There are no published consolidated financial statements prepared at the Spinnaker Bidco Limited level. For preparing this report, consolidated financial statements were prepared by aggregating the financial statements for the entities in the Solvency II Group and eliminating any inter-company transactions between entities within the Solvency II Group. Similarly, the Solvency II valuation was prepared aggregating inputs for each of the entities in the Group and also eliminating inter-company transactions within the Group.

The Group has prepared a full consolidated balance sheet for the subsidiary holding company, Aetna HoldCo (UK) Limited, the insurance undertaking subsidiary, AICL, and AGBUK, the insurance service entity that is treated as an ancillary service undertaking under Solvency II.

The following table analyses the Group's assets and liabilities on 31 December 2020, showing the movement between the IFRS valuation and the Solvency II valuation.

Net Assets $000	Section Notes	IFRS 2020	Valuation & Reclassification Adjustments 2020	Solvency II 2020	Solvency II 2019
Deferred Acquisition Costs	1	14,147	(14,147)	-	-
Intangible Asset	2	904	(904)	-	-
Property, Plant & Equipment held for own use	3	8,097	(2,462)	5,635	6,989
Deferred Tax	4	-	-	-	-
Financial Investments:	5				
Government Bonds		118,737	648	119,385	111,858
Corporate Bonds		91,621	-	91,621	84,620
Cash Deposit		-	51,119	51,119	18,186
Reinsurance recoverable	6	1,829	887	2,716	(239)
Insurance receivables	7	104,206	(62,149)	42,057	104,624
Reinsurance receivables	8	3,851	(3,159)	692	3,334
Trade receivables	9	4,693	(2,700)	1,993	2,768
Cash and cash equivalents	10	114,262	(51,119)	63,143	38,790
Other receivables	11	1,759	-	1,759	976
Total Assets		**464,106**	**(83,986)**	**380,120**	**371,906**
Technical Provisions	11	180,176	(43,923)	136,253	143,568
Insurance Balances payable	12	34,945	(34,945)	-	7,894
Reinsurance payables	13	161	-	161	1,700
Trade and other payables	14	21,404	(1,028)	20,376	12,289
Other Liabilities	15	12,586	-	12,586	14,475
Total Liabilities		**249,272**	**(79,896)**	**169,376**	**179,926**
Net Assets/Own Funds		**214,834**	**(4,090)**	**210,744**	**191,980**

D.1 Assets

The Group consolidated balance sheet includes assets and liabilities in the consolidated balance sheet, which have been subject to solvency valuation rules on a solo entity basis, and there is no difference in the solvency valuation rules applied to the Group compared to the AICL solo valuation. Related party transactions between subsidiaries within the Solvency II Group are eliminated in the consolidated balance sheet prepared on an accounting basis and for the Solvency II valuation of assets and liabilities.

Group assets are valued at the amounts for which they could be exchanged between knowledgeable willing parties in an arm’s length transaction. The classes of assets stated in the economic balance sheet are valued individually. The Group monitors the valuation of assets and considers if there are any changes in circumstances which might require a change in the valuation applied. Such changes might include:

- new market developments that change market conditions
- new information
- information previously used is no longer available; and
- improvements to valuation techniques.

The Group also applies the materiality principle, applying judgements to estimates and estimation methods where necessary. The principles that have been applied to the valuation of the financial assets is detailed further below.

In 2019, AGBUK implemented the IFRS16 rules in respect of operating leases applicable to the properties used for business purposes. The Group has applied the IFRS16 rules for both Solvency II and IFRS valuation.

There were no other changes to the recognition and valuation bases used or to estimations during the reporting period..

Note 1: Deferred Acquisition Costs

Deferred acquisition costs of $14,147k are excluded from the valuation of assets for solvency purposes. Under Solvency II rules, the value of deferred acquisition costs was recognised at nil.

Note 2: Intangible Assets

Intangible Assets representing the amortisation of a premium paid for renewal rights on a portfolio are excluded from the valuation of assets for solvency purposes.

Under solvency valuation rules the intangible assets are recognised at nil.

Note 3: Property, Plant & Equipment

The IFRS16 cost-based valuation has been used for Solvency II valuation of leases on the basis that is not considered by management to be materially different from an IFRS market consistent valuation.

The accounting valuation of property, plant and equipment includes the capitalisation of costs for the fit-out of the UK offices, which does not have any economic value if the Group were to relocate offices and therefore has been excluded from the Solvency II valuation.

The accounting valuation of property plant and equipment includes furniture and IT equipment, which is moveable and could be exchanged between two knowledgeable and willing parties in an arm's length transaction. However, the value of the furniture and IT equipment is not considered material at the balance sheet date and has been excluded in the valuation of assets for solvency purposes.

Note 4: Deferred Tax

Deferred tax is estimated using the balance sheet method, providing for temporary differences between the carrying amounts of assets and liabilities for financial reporting purposes and the amounts used for taxation purposes. Detailed tax computations have been prepared for AICL and AGBUK, and both entities have tax losses carried forward. A deferred tax asset is not recognised in the Group 2020 Solvency II balance sheet (2019: Nil) as there is insufficient evidence at the reporting date in relation to the timing of the future economic benefits for the utilisation of the cumulative tax losses. This position will be reviewed when profits are reported in future periods.

The net growth in AICL in the last 4 years has mainly stemmed from business migrating to AICL from other related parties within Aetna International. The total business remains a single product and there is track record for positive underwriting margins on the business migrated to AICL.

The unrecognised deferred tax asset for AICL in 2020 is $10,917k (2019: 11,911k). There is an increase in net assets under the AICL entity Solvency II valuation rules $425k which gives rise to a potential deferred tax liability of $81k in AICL. The deferred tax liability largely relates to changes in the value of insurance technical provisions for the UK and Singapore branch business. The Singapore branch business is also taxed in the UK and so available for offset against the unrecognised deferred tax asset for UK trading losses carried forward.

The future UK profits on the unwinding of the deferred AICL tax liability should be available for offset against the unrecognised AICL deferred tax asset on the AICL trading losses carried forward of $57.46m (2019: $70.06m), subject to any restrictions on the timing of the unwind of future profits. As such, there is no net deferred tax liability recognised in the AICL SFCR or this consolidated SFCR.

The AICL underwriting margins are expected to exceed the costs attributable to running the AICL business in future periods and generate future profits.

The unrecognised tax asset for AGBUK is $3,207k (2019: $3,023k) that relates to the origination and reversal of timing differences. The unutilised tax losses may still be recovered against future profits and the Group will review the recognition of a deferred tax assets when further profits are reported in a future period.

There are no other unrecognized deferred tax assets in the Solvency II Group. This is due to the brought forward tax losses being extinguished following a significant increase in share capital following the change in ownership (the ultimate parent as acquitted by CVS Health Group in November 2018).

At the consolidated level, there is a decrease in net assets under the Solvency II valuation rules of $4,090k because of consolidation adjustments which gives rise to a potential deferred tax asset on these deductible temporary timing differences of $777k. A deferred tax asset is not recognized for these deductible temporary timing differences in the Group Solvency II balance sheet (2019: Nil) as there is in-sufficient evidence at the reporting date in relation to the timing of the future economic benefit on utilization. This position will be review when profits are reported in future periods.

Note 5: Financial Investments

The financial assets include investments in government bonds, corporate bonds and commercial paper in accordance with the Board approved investment parameters. The assets are included at fair value using a mark to market approach, based on readily available market prices that are sourced independently. Quotations are considered as active market prices if the quoted prices or rates represent actual and regularly occurring transactions that are available from a stock exchange, dealer or broker.

The investments are valued under the IFRS Level 1 (56% of total value of financial investments) and the Level 2 tier of fair value hierarchy, which link into the Solvency II valuation hierarchy.

The Levelling hierarchies are as follows:

Level 1: quoted prices (Unadjusted) on an active market for identical assets and liabilities

Level 2: inputs other than quoted prices included in Level 1 that are observable for the asset or liability, either directly (i.e. as prices) or indirectly (i.e. derived from prices).

Accrued income included in trade receivables under IFRS rules, is added to the market value of the investment bonds under Solvency II valuation rules. There has been no adjustment to the valuation of the financial investments in the Company's financial statements for the Reporting Period and the valuation is based on quoted market prices at the valuation date.

Cash held on fixed term deposit is valued at fair value, representing the valuation of the cash that could be exchanged between two knowledgeable parties in an arm's length transaction. The deposits are renewed monthly for fixed terms. Consequently, there is less than 12 months to maturity and the value of the deposit has not been discounted. These fixed term cash deposits are reclassified as financial assets in the Solvency II balance sheet.

Financial investments $000	**IFRS**	**Valuation & Reclassification Adjustment**	**Solvency II**
Government Bonds	118,737	648	119,385
Corporate Bonds & Commercial Paper	91,621	-	91,621
Deposits other than Cash Equivalents	-	51,119	51,119
Total Financial Investments	**210,358**	**51,767**	**262,125**

Note 6: Reinsurance recoverable

For this approach, the actuarial reserving director has reviewed the events that create a recoverable cash flow and the amounts included in the valuation are consistent with the terms of the reinsurance agreement.

It is assumed that reinsurance recoveries on incurred but not reported ("**IBNR**") claims are only relevant for the events not in data ("**ENID**") allowance (which is an estimate of the value of future claims in excess of the $250k retention). The reinsurance recoverable on IBNR is estimated at 17.5% of the ENID amount. This was parameterized by an independent consultancy and validated by considering that the result is similar to that of a small number of large claims that could reasonably be expected to relate to the claims reserve.

Reinsurance recoveries on the premium reserve are estimated as a percentage of the total premium provision before expenses and other non-claims cash flows (such as premiums receivable), based on an historical analysis of claims.

A default allowance of 1.23% is applied based on average credit spreads based on Standard & Poor's default rates from their 2012 corporate bond study for issuers of a similar credit rating to the Company's reinsurer. This adjustment is immaterial but included for completeness.

Reinsurance recoveries were assumed to occur at the same time as the underlying claim payments to members. Due to the small lag between these payments and receipt of cash from the reinsurer (Aetna Life & Casualty (Bermuda) Limited, another CVS Group insurance company), this was considered immaterial (reinsurance recoverable $1,828K less reinsurance payable $2,223k on future premiums , net outflow ($395k), and assuming a discounting lag of 1 year at 1% yield would result in only a $20k change in value).

The amount disclosed in the financial statements for reinsurance recoverable in respect of unearned premiums ($1,170k) is not included in the solvency II valuation of reinsurance recoverable, which was partially offset by the solvency II revaluation increase to claims recoverable of $728k.

Note 7: Insurance Receivables

Insurance receivables comprise amounts past due at the valuation date. The reclassification adjustment below represents the movement of premiums not due at the valuation date out of non-technical assets and into the calculation of the technical provisions under Solvency II valuation rules.

The balance decreased between 2020 and 2019 due to strong premium collections in 2020, which is evidenced in the increased cash balances at end 2020.

There are controls and procedures in place to check to ensure the accuracy of invoicing and the monitoring of premiums collected. Summary reports and analysis on the recoverability of debts is provided to senior management and the Board. The valuation of the asset takes into account the effectiveness of the controls and includes an allowance for unrecoverable debts. The valuation included in the Solvency II balance sheet represents cash flows management expect to recover in less than 12 months from the valuation date.

The insurance balances receivable in the AICL financial statements also include insurance balances recoverable from related parties within the CVS Group $1,030k (2019: $1,020k). These balances are also past due and will be recovered within 12 months from the valuation date.

$000	IFRS	Valuation & Reclassification Adjustments	Solvency II Valuation Adjustments	Solvency II 2020	Solvency II 2019
Insurance Receivables	104,206	(62,149)	-	42,057	104,624

Note 8: Reinsurance receivables

Reinsurance recoveries on claims already paid by the Company (but for which payment is yet to be received from the reinsurer), are treated as "reinsurance receivables". There are procedures and controls in place to ensure the accurate recording of claims paid and recorded for recovery under the excess of loss reinsurance treaty. Summary reports are provided and discussed with the related party reinsurer. Balances receivable are settled on a regular basis.

Note 9: Trade receivables

The receivables (trade, not insurance balances) relate to receivables which are due within 1 year and carrying value are taken to approximate fair values under Solvency II valuation rules. The value stated represents the amount that could be exchanged between two knowledgeable and willing parties in an arm's length transaction.

The reclassification and valuation adjustments include $648k accrued interest on the investment bonds, which is reclassified as financial asset under Solvency II valuation rules, and a valuation adjustment of $2,052k (2019: $1,654k) in respect of IFRS prepayments which are not recognised under Solvency II valuation rules.

$000	IFRS	Valuation & Reclassification Adjustments	Solvency II 2020	Solvency II 2019
Trade Receivables	4,693	(2,700)	1,993	2,768

Note 10: Cash and cash equivalents

Cash and cash equivalents comprise cash on hand and demand deposits with banks. Cash and cash equivalents are considered to be held at fair value under Solvency II. The cash on fixed term deposit has been reclassified in the Solvency II balance sheet as financial investments, per note 5 above.

	IFRS	Valuation & Reclassification Adjustments	Solvency II 2020	Solvency II 2019
Cash and cash equivalents	114,262	(51,119)	63,143	38,790
Total cash	**114,262**	**(51,119)**	**63,143**	**38,790**

Note 11 – Other Receivables

There outstanding group receivables (trade, not insurance balances) relating to AGBUK receivables from related party entities outside the Solvency II group were $1,759k (2019: $976k).

The amounts are due within 1 year and carrying value is taken to approximate fair value under Solvency II valuation rules.

D.2 Technical Provisions

Note 12

The technical provisions are calculated for the AICL's single line of business, Medical Expenses Insurance. The technical provisions comprise the Best Estimate Liabilities ("**BEL**") and the risk margin, under Solvency II rules. At 31st December 2020, the technical provisions were:

Technical Provisions	2020 $000	2019 $000
Best Estimate Liabilities (BEL)	130,965	138,325
Risk Margin	5,288	5,243
Total	**136,253**	**143,568**

The main impact for the decrease in value of the 2020 technical provisions was the reduction in business volumes between 2019 and 2020.

AICL does not make use of the matching adjustment, volatility adjustment, transitional risk-free interest rate-term structure or the transitional measure on technical provisions.

There are no other material changes to inputs and assumptions used for the valuation of the technical provisions.

BEL

The BEL is calculated as the sum of a Gross Premium Reserve and Gross Claims Reserve.

Gross Claims Reserve

The best estimate of provisions for claims outstanding (referred to as the Gross Claims Reserve) is the expected present value of all future claim and expense cash flows related to claim events that occurred prior to the valuation date. Any explicit prudence included the IFRS Outstanding Claims reserve is removed to calculate the best estimate Gross Claims Reserve. Claims cashflows are then projected based on historical payment patterns of the business.

An allowance is included for the best estimate value of expenses (including direct and indirect costs) relating to the settling of these claims.

An adjustment is also made to include other accounting liabilities representing future claims cash flows, such as claims payable that are not already included in the IFRS Outstanding Claims reserve and ENIDs.

Gross Premium Reserve

The Gross Premium Reserve is the expected present value respect of future claim, expense and premium cash flows relating to claims events occurring after the valuation date and before the end of the insurance coverage period for the relevant policies. This includes a transfer from insurance receivables for future premium cashflows due under policy contracts issued at the valuation date.

The claims cash flows for this reserve are calculated by projecting the future premiums to be earned on business that is legally bound at the valuation date (including business not yet incepted at the valuation date) to the end of the coverage period of the relevant policies.

Future expected incurred claims are projected by applying an appropriate loss ratio to the future earned premium; the corresponding claims cash flows are then projected based on historical payment patterns.

An allowance is included for the best estimate value of expense cash flows (including direct and indirect costs) relating to the settling of these claims and future administration of these policies. The Gross Premium Reserve includes allowance for the value of premiums not yet due and other relevant insurance receivables or payables.

The BEL claims cash flows include allowance for ENIDs so that the BEL reflects an expected probability-weighted average of future cash flows.

The cashflows for the Gross Claims Reserve and Gross Premium Reserve are then discounted at yields provided by EIOPA, depending on the projected timing and currency of the cashflows.

Risk Margin

The risk margin is calculated using the following assumptions:

- the business, including reinsurance, is transferred to a reference undertaking with no other insurance obligations or own funds before the transfer, and which does not write any further business (including renewals of existing business)
- the reference undertaking is capitalized as described under Solvency II rules and
- The assets are selected to minimize market risk

The SCR under the above assumptions is projected for future years using key risk drivers. The risk margin is calculated by multiplying the projected SCRs by a 6% Cost of Capital and discounting to the valuation date.

IFRS value of technical reserves vs Solvency II Technical Provisions

The quantification of the difference between the IFRS value of technical reserves and the Solvency II Technical Provisions for the Company (which consists only of Medical Expenses business) is shown below:

Technical Provisions	2020 $000	2019 $000
IFRS Outstanding Claims Reserve (OCR)	46,782	58,636
IFRS Unearned Premium Reserve (UPR)	133,394	158,732
IFRS Technical reserve	**180,176**	**217,368**
Remove:		
Prudence in IFRS Outstanding Claims Reserve	(3,264)	(4,090)
Unearned Premium Reserve	(133,393)	(158,732)
Premiums not yet due and other receivables/payables	(27,204)	(55,229)
Add:		
Project Gross Premium Reserve claims (excluding Business Bound Not Incepted)	97,904	121,678
Additional allowance for Events Not In Data	5,836	5,364
Best estimate expense allowance for incepted contracts	24,451	25,812
Net Bound But Not Incepted (BBNI) cashflows	(13,521)	(12,360)
Discounting of claims and expense cashflows	(20)	(1,486)
Total IFRS to Solvency II Best Estimate adjustments	**(49,211)**	**(79,043)**
Best Estimate Liability	**130,965**	**138,325**
Add Risk Margin	5,288	5,243
Technical Provisions	**136,253**	**143,568**

Technical Provisions – Uncertainty

The main sources of uncertainty in the technical provisions relate to cases where actual claims or expense experience may emerge to be worse than expected. The following are key areas where actual experience may differ from that assumed in the technical provision calculation:

- Actual claims experience for past dates of treatment could be higher than that estimated in the claims reserve
- Claims experience on incepted and bound but not incepted contracts for future dates of treatment could be higher than that estimated in the premium reserve
- Actual expense costs relating to claims yet to be paid could be higher than expected

Note that several factors may affect the actual emerging experience in the above areas, such as individual large claims, particular population-based trends in a region or operational aspects such as delays in claims submissions from providers.

Illustrative sensitivities of the Best Estimate Liability to these factors, based on provisional annual results to be submitted to the PRA, are set out in the table below, together with two combination sensitivities (items d and e) which represent a high and low estimate for plausible deviations in actual experience from that assumed:

	Unaudited Best Estimate ($ m)	Unaudited Change in Best estimate ($ m)
YE20 Best Estimate	130.9	
a) Unearned MBR +1%	132.3	1.3
b) Earned MBR +1%*	133.9	1.6
c) Expenses + 10%	136.3	2.4
d) High sensitivity	139.0	8.0
e) Low sensitivity	127.0	(4.0)

The high sensitivity assumes that each of the scenarios described below occur within 12 months

- The actual MBR on Unearned exposure is 3% higher than the Solvency II Best Estimate
- The MBR on Earned exposure is 1% higher than the Solvency II best estimate assumption for each segment of business for the last six treatment months of 2020
- Expenses rise 10% above the best estimate assumption

In this case, the Best Estimate Liability would increase by $8.0m. Although the solvency of AICL is beyond the scope of this paper, it is worth noting that for such an increase in TP (assuming no change in Solvency Capital Requirement) the AICL solvency ratio would still remain comfortably above its risk appetite target.

The low sensitivity assumes that only one of the scenarios described above occurs within 12 months, being a 3% decrease in MBR on Unearned Exposure.

D.3 Other Liabilities

Note 13: Insurance Balances payable

The insurance balances payable included in the Financial Statements have been included in the technical provisions. Claims liabilities included under insurance balances payable in the IFRS balance sheet are included in the calculation of the Technical Provisions under Solvency II valuation rules.

The technical provisions also include allowances for broker commissions and premium taxes payable.

There are no insurance balances liabilities presented as past due at the valuation date (2019: $7,894k). The balance presented for 2019 did include provisions for commissions and taxes, which were not all past due at the valuation date.

$m	IFRS	Valuation & Reclassification Adjustments	Solvency II Valuation Adjustments	2020 Solvency II	2019 Solvency II
Insurance Balances Payable	34,945	(34,945)	-	-	7,894

Note 14: Trade and Other payables

Trade payables include amounts due to suppliers, public entities, etc, and which are not insurance related. Trade payables solely comprise amounts which fall due within 12 months and are considered to be held at fair value, representing the value at which the balances could be exchanged between two knowledgeable and willing parties in an arm's length transaction.

Note 15: Other liabilities

Other liabilities include amounts payable to related parties within the CVS Group, excluding transactions between related parties in the Solvency II Group. These liabilities are measured as past due at the valuation date and therefore represent the amount expected to be paid.

Other liabilities include also include the operating lease liability which is based on IFRS16 for the Solvency II valuation.

There were no changes to the recognition and valuation base assumptions used or to estimation of liabilities for the Reporting period.

D.4 Alternative Valuation Methods

There are no alternative valuation methods applied to the valuation of the Group assets.

D.5 Other Material Information

There is no additional material information to disclose other than that disclosed in Sections D.1 to D.4.

E. CAPITAL MANAGEMENT

E.1 Own Funds

This section provides information on Spinnaker's Own Funds and the Solvency Capital Requirement ("**SCR"**) and Minimum Consolidated Group SCR (**"MCGSCR"**), including changes over the reporting period together with explanation of the material differences between net assets under IFRS and the Solvency II excess of assets over liabilities.

The Solvency II capital assessment involves valuation of Own Funds in line with the Solvency II regulations. Solvency II surplus is the excess of Eligible Own Funds over the SCR

The capital position for the Group is presented in the table below:

Composition and quality of own funds

Under Solvency II regulation, capital is referred to as Own Funds and the regulation distinguishes between Basic Own Funds (BOF) and Ancillary Own Funds (AOF). There are tiers of Own Funds and restrictions applied to the extent to which the various components of Own Funds can be used to meet the capital requirements.

Eligible Own Funds to cover SCR/MCR	2020 $000	2019 $000
Eligible Own Funds	210,744	191,287
SCR	83,304	87,895
Solvency II Surplus	127,440	103,392
Ratio of eligible Own Funds to SCR	253%	218%
MCGSCR	20,310	22,310
Ratio of eligible Own Funds to MCGSCR	1038%	857%

The analysis of the Solvency Position is shown in the table below:

Equity in Financial Statements $000	Tier 1 Un-restricted	Total 2020	Total 2019
Ordinary Share Capital	213,768	213,768	213,768
Share Premium paid	88,327	88,327	88,327
Reconciliation Reserve	(91,351)	(91,351)	(110,115)
Excess of Assets & Liabilities	210,744	210,744	191,980
Deferred Tax Asset	-	-	-
Ring Fenced Adjustment	-	-	(693)
Eligible Own Funds available to meet SCR/MCR	210,744	210,744	191,287
Ratio of Eligible Own Funds to meet SCR	253%	253%	218%

Spinnaker's ordinary share capital and the related share premium amount are classified as Tier 1 capital since Spinnaker's Articles of Association do not prohibit the cancellation of dividends after they have been declared.

Additional information on the calculation of Spinnaker's Own Funds:

- Spinnaker is an insurance holding company
- all the ordinary shares were issued by Spinnaker in the UK
- there is a restriction to Own Funds eligible to cover the Group in respect of a ring-fencing adjustment for the AICL Singapore branch, however this restriction is nil for 2020
- Spinnaker's Own Funds have been calculated on the fully consolidated Solvency II balance sheet, prepared under the Solvency II method I rules of consolidation.

The Company has no restricted Tier 1 capital. There is just once class of ordinary share issued by the Company. All the issued shares and attaching share premium are fully paid up. There are no other classes of shares issued, nor any subordinated loans issued by the Company.

Approach to Capital Management

Capital management focuses on ensuring that there is sufficient capital retained to meet the regulatory requirements (MCR and SCR) for AICL. The finance function monitors the AICL and Group capital position, checking the Group surplus in line with internal, regulatory and rating agency capital requirements. The finance, risk management and actuarial functions collaborate to provide the AICL Board with internal and regulatory stress testing.

The AICL Capital Plan aims to:

- document the regulatory and minimum capital levels under baseline and stress scenarios; and
- describe the capital implications and actions required in the event that a stress scenario occurs.

The Group Capital Plan is an analysis of AICL's capital sources and uses a three-year time frame that takes into consideration:

- macroeconomic and financial market scenarios
- business and strategic plan
- applicable regulations; and
- capital resources calculated under future scenarios using the Solvency II standard formula.

The Group has sufficient capital to support its strategic growth targets and there were no additional capital contributions in 2020.

Details of the movements in Eligible Own Funds during the period are shown in the table below:

Tier 1 Capital Issued $000	Eligible Own Funds after Ring Fenced Fund Restriction
Group Eligible Own Funds - 31st December 2019	**191,287**
Reverse 2019 SII Valuation Adjustments	4,887
Reverse Ring Fenced Restriction	693
Closing 2019 IFRS Net Assets	**196,867**
2020 Movements:	
IFRS Earnings	17,657
Group Foreign Exchange Movements	310
Capital Contributions	-
Closing IFRS Net Assets	214,834
Group Solvency II Valuation Adjustments	(4,090)
Ring Fenced Fund Restriction	-
Closing Group Eligible Own Funds 31st December 2020	**210,744**

The total eligible amount of own funds to cover the **SCR** is $210,744k (2019: $191,287k) and the total amount of unrestricted Tier 1 own funds to cover the **MCGSCR** is $210,744k (2019: $191,287k) and there is no requirement for a ring fencing adjustment to Own Funds in respect of the AICL's Singapore branch (2019: $693k) because the SCR calculated for the Singapore Branch is higher than the base capital requirement under local rules.

Ring Fencing of Singapore Branch

AICL operates a branch in Singapore which is subject to local regulations and solvency requirements set by the Monetary Authority in Singapore ("MAS"). The Group has interpreted the Solvency II valuation rules to mean that the funds held to meet the minimum MAS capital requirements for the branch must be ring fenced. The Group methodology for calculating the ring-fenced capital requirement compares the calculation of the Singapore branch SCR with the MAS minimum capital requirement (2019: MAS minimum capital requirement used). MAS introduced new risk-based capital model methodology in 2020 and the branch capital requirement was reduced under the new methodology, with no material reduction to the level of business in the Singapore branch.

The ring-fencing is treated as follows in the Solvency II calculations:

- an SCR is calculated separately for the branch and the rest of the business. The total SCR is the sum of these two SCRs (this disallows diversification between the two sets of business);
- as the branch SCR is higher than the minimum MAS capital requirements, there is no adjustment for ring fenced funds to the Own Funds available to meet the SCR (2019: 693k); and
- the value of assets and liabilities in the branch is fully included in the overall own funds of the Company.

The year end 2020 calculation is shown below:

Summary Ring Fenced Calculation	2020 $000	2019 $000
Singapore Local MAS Minimum Capital Requirement	10,046	17,389
Assets subject to ring-fencing restriction	10,046	17,389
Singapore Branch SCR calculation	19,907	16,696
Ring Fencing Deduction to Own Funds	-	**693**

The following table reconciles to the bridge between IFRS and Solvency II as shown in table D1, in section D of this document. The main driver for the change in the reconciliation reserve, is the change in the valuation of technical provisions. There are no material changes to the inputs or assumptions used for the valuation of the technical provisions and the change in value between 2020 and 2019 is driven by volume changes in the business.

Reconciliation of IFRS equity to excess of assets & liabilities	2020 $000	2019 $000
Net Equity IFRS basis	**214,834**	**196,867**
SII Valuation Differences:		
Assets increase/(decrease)		
Deferred Tax Asset	-	-
Deferred Acquisition Costs	(14,147)	(14,816)
Intangible Assets	(904)	(1,536)
Property Plant & Equipment	(2,462)	(4,324)
Reinsurance recoverable	887	(5,748)
Insurance receivables	(62,149)	(85,739)
Reinsurance receivables	(3,159)	3,334
Trade receivables	(2,052)	(1,655)
Total asset valuation differences	(83,987)	**(110,484)**
SII Liabilities (increase)/decrease		
Technical Provisions	43,923	73,800
Insurance balances payable	34,945	30,511
Reinsurance payables	-	-
Trade and other payables	1,028	1,286
Total Liabilities Valuation Difference	**79,897**	**105,597**
Excess of assets over liabilities	**210,744**	**191,980**

The following table includes a summary of the reconciliation reserve. The excess of assets over liabilities includes impacts for the best estimate calculation of the technical provisions. Section D discusses uncertainties associated with the calculation of the technical provisions and therefore there is some potential volatility in the reconciliation reserve shown in the table below

Reconciliation Reserve	2020 $000	2019 $000
Excess of Assets over Liabilities in Solvency II Balance Sheet	**210,744**	**191,980**
Less:		
Ordinary Share Capital	(213,768)	(213,768)
Share Premium Account	(88,327)	(88,327)
Reconciliation Reserve pre-availability restrictions	(91,351)	(110,115)
Adjustments for restricted Own Funds in respect of RFF	-	(693)
Reconciliation Reserve total (as shown in Own Funds QRT)	**(91,351)**	**(110,808)**

E.2 SCR and MCGSCR

The amount of Spinnaker's SCR and MCGSCR at the end of the Reporting Period are $83,304k (2019: $87,895k) and $20,310k (2019: $22,310k) respectively.

SCR

The table below shows the components of the SCR (using the Standard Formula) at 31st December 2020.

SCR Calculation	$000 2020	$000 2019
Market Risk	32,179	34,159
Default Risk	13,849	22,668
Health Risk	52,418	50,791
Diversification	(24,933)	(29,575)
Basic Solvency Capital Requirement	**73,513**	**78,043**
Operational Risk	9,791	9,852
SCR	**83,304**	**87,895**
MCGSCR	20,310	22,310

The Total SCR of $83,304k (2019: $87,895k) has decreased by $4,591k with an increase in the Health Risk margin offset by a reduction in the default risk margin due to lower outstanding insurance receivables $42,057k (2019: $104,624k). Some large scheme debts at end 2019 were paid in full in early 2020 and overall premium collection was strong during 2020. This was the main change in SCR for the period.

MCGSCR

The MCGSCR was calculated using the following inputs:

- net of reinsurance BEL $131,960k
- net of reinsurance written premiums in the 12 months to 31 December 2020 of $296,309k; and
- AICL SCR of $81,241k.

These inputs were used in the calculation according to Articles 248-253 of the Solvency II Commission Delegated Regulation. The resulting MCR is equal to solo MCR of AICL, being the only insurance undertaking in the Group.

The minimum base floor MCR is lower than the minimum applicable to AICL for its permissions and therefore the minimum USD $4,328k (ERU 3.7m) applies.

Material Changes in the SCR and MCGSCR over the Reporting Period

There has been no material change in the methodology used to calculate AICL's MCGSCR and SCR during the Reporting Period. The SCR is calculated using the Standard Formula with no undertaking specific parameters applied.

SCR /MCR	2020 $000	2019 $000
SCR	**83,304**	**87,895**
MCGSCR	20,310	22,310

The SCR primarily decreased due to the lower default risk charge discussed above. The Group continues to plan for growth of the business through its forward-looking capital management process and there is sufficient levels of retained capital to support the projected additional business in future periods.

E.3 Use of duration-based equity sub-module in the calculation of the SCR

The Group did not make use of the duration-based equity risk sub-module in the reporting during the Reporting Period.

The Group also did not apply any simplified calculations in the use of the Standard Formula to calculate the risk margins in the SCR

E.4 Differences between the Standard Formula and Internal Model used

The Group uses the Standard Formula to calculate the SCR and therefore no difference exists.

E.5 Non-Compliance

During the Reporting Period, there were no instances of non-compliance with the Solvency II capital requirements.

It is also noted that the PRA have not applied any capital add-ons to the SCR calculated by Spinnaker.

This document is available on the Aetna International website

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Balance sheet

		Solvency II value
		C0010
Assets		
Goodwill	R0010	
Deferred acquisition costs	R0020	
Intangible assets	R0030	-
Deferred tax assets	R0040	-
Pension benefit surplus	R0050	-
Property, plant & equipment held for own use	R0060	5,635
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	262,125
Property (other than for own use)	R0080	
Holdings in related undertakings, including participations	R0090	
Equities	R0100	
Equities - listed	R0110	
Equities - unlisted	R0120	
Bonds	R0130	211,006
Government Bonds	R0140	119,385
Corporate Bonds	R0150	91,621
Structured notes	R0160	-
Collateralised securities	R0170	
Collective Investments Undertakings	R0180	-
Derivatives	R0190	
Deposits other than cash equivalents	R0200	51,119
Other investments	R0210	
Assets held for index-linked and unit-linked contracts	R0220	
Loans and mortgages	R0230	
Loans on policies	R0240	
Loans and mortgages to individuals	R0250	
Other loans and mortgages	R0260	
Reinsurance recoverables from:	R0270	
Non-life and health similar to non-life	R0280	2,716
Non-life excluding health	R0290	-
Health similar to non-life	R0300	2,716
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	
Health similar to life	R0320	
Life excluding health and index-linked and unit-linked	R0330	
Life index-linked and unit-linked	R0340	
Deposits to cedants	R0350	
Insurance and intermediaries receivables	R0360	42,057
Reinsurance receivables	R0370	692
Receivables (trade, not insurance)	R0380	1,993
Own shares (held directly)	R0390	-
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	-
Cash and cash equivalents	R0410	63,143
Any other assets, not elsewhere shown	R0420	1,759
Total assets	**R0500**	**380,120**

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Balance sheet

		Solvency II value
		C0010
Liabilities		
Technical provisions – non-life	R0510	
Technical provisions – non-life (excluding health)	R0520	
Technical provisions calculated as a whole	R0530	
Best Estimate	R0540	
Risk margin	R0550	
Technical provisions - health (similar to non-life)	R0560	136,253
Technical provisions calculated as a whole	R0570	-
Best Estimate	R0580	130,965
Risk margin	R0590	5,288
Technical provisions - life (excluding index-linked and unit-linked)	R0600	-
Technical provisions - health (similar to life)	R0610	-
Technical provisions calculated as a whole	R0620	-
Best Estimate	R0630	-
Risk margin	R0640	-
Technical provisions – life (excluding health and index-linked and unit-linked)	R0650	-
Technical provisions calculated as a whole	R0660	-
Best Estimate	R0670	-
Risk margin	R0680	-
Technical provisions – index-linked and unit-linked	R0690	-
Technical provisions calculated as a whole	R0700	-
Best Estimate	R0710	-
Risk margin	R0720	-
Other technical provisions	R0730	
Contingent liabilities	R0740	-
Provisions other than technical provisions	R0750	-
Pension benefit obligations	R0760	-
Deposits from reinsurers	R0770	-
Deferred tax liabilities	R0780	-
Derivatives	R0790	-
Debts owed to credit institutions	R0800	-
Financial liabilities other than debts owed to credit institutions	R0810	-
Insurance & intermediaries payables	R0820	-
Reinsurance payables	R0830	161
Payables (trade, not insurance)	R0840	20,376
Subordinated liabilities	R0850	-
Subordinated liabilities not in Basic Own Funds	R0860	-
Subordinated liabilities in Basic Own Funds	R0870	-
Any other liabilities, not elsewhere shown	R0880	12,586
Total liabilities	**R0900**	**169,376**
Excess of assets over liabilities	**R1000**	**210,744**

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Premiums, claims and expenses by line of business

Non-Life (direct business/accepted proportional reinsurance and accepted non-proportional reinsurance)

		Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)												Line of Business for: accepted non-proportional reinsurance				
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Health	Casualty	Marine, aviation, transport	Property	Total
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0200
Premiums written																		
Gross - Direct Business	R0110	130,939																130,939
Gross - Proportional reinsurance accepted	R0120	169,022																169,022
Gross - Non-proportional reinsurance accepted	R0130																	-
Reinsurers' share	R0140	3,653																3,653
Net	R0200	296,309																296,309
Premiums earned																		-
Gross - Direct Business	R0210	163,346																163,346
Gross - Proportional reinsurance accepted	R0220	163,130																163,130
Gross - Non-proportional reinsurance accepted	R0230																	-
Reinsurers' share	R0240	3,958																3,958
Net	R0300	322,518																322,518
Claims incurred																		-
Gross - Direct Business	R0310	104,067																104,067
Gross - Proportional reinsurance accepted	R0320	109,752																109,752
Gross - Non-proportional reinsurance accepted	R0330																	-
Reinsurers' share	R0340	6,263																6,263
Net	R0400	207,556																207,556
Changes in other technical provisions																		-
Gross - Direct Business	R0410	927																927
Gross - Proportional reinsurance accepted	R0420	(176)																(176)
Gross - Non- proportional reinsurance accepted	R0430																	-
Reinsurers' share	R0440	-																-
Net	R0500	751																751
Expenses incurred	R0550	102,839																102,839
Other expenses	R1200																	-
Total expenses	R1300																	102,839

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Premiums, claims and expenses by country

		Home Country - non-life obligations	**Top 5 countries (by amount of gross premiums written) - non-life obligations**					**Total Top 5 and home country - non-life obligations**
		Home country	United Arab Emirates	Singapore	Netherlands	Greece	Viet Nam	Total Top 5 and home country
		C0080	C0080	C0080	C0080	C0080	C0080	C0140
Premiums written								
Gross - Direct Business	R0110	38,176	(742)	58,424	3,665	3,157	65	102,745
Gross - Proportional reinsurance accepted	R0120	(62)	159,930	(2)	-	-	6,508	166,373
reinsurance accepted	R0130	-	-	-	-	-	-	-
Reinsurers' share	R0140	-	-	-	-	-	-	-
Net	R0200	38,113	159,188	58,424	3,665	3,157	6,572	269,119
Premiums earned								
Gross - Direct Business	R0210	36,639	(900)	58,281	3,429	3,371	244	101,064
Gross - Proportional reinsurance accepted	R0220	(61)	150,284	(2)	-	-	6,241	156,462
reinsurance accepted	R0230	-	-	-	-	-	-	-
Reinsurers' share	R0240	(449)	(1,833)	(715)	(42)	(41)	(80)	(3,161)
Net	R0300	37,027	151,218	58,995	3,471	3,412	6,564	260,687
Claims incurred								
Gross - Direct Business	R0310	(16,201)	(200)	(42,230)	(1,475)	(1,748)	(144)	(61,999)
Gross - Proportional reinsurance accepted	R0320	(5)	(105,839)	403	-	-	(3,577)	(109,018)
reinsurance accepted	R0330	-	-	-	-	-	-	-
Reinsurers' share	R0340	-	-	-	-	-	-	-
Net	R0400	(16,206)	(106,039)	(41,827)	(1,475)	(1,748)	(3,721)	(171,016)
Changes in other technical provisions								
Gross - Direct Business	R0410	166	6	463	3	17	(0)	656
Gross - Proportional reinsurance accepted	R0420	-	(384)	-	-	-	(42)	(426)
reinsurance accepted	R0430	-	-	-	-	-	-	-
Reinsurers' share	R0440	-	-	-	-	-	-	-
Net	R0500	166	(378)	463	3	17	(42)	230
Expenses incurred	R0550	7,259	47,980	15,235	2,380	701	3,211	76,766
Other expenses	R1200							-
Total expenses	R1300							76,766

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Own funds

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector						
Ordinary share capital (gross of own shares)	R0010	213,768	213,768			
Non-available called but not paid in ordinary share capital at group level	R0020					
Share premium account related to ordinary share capital	R0030	88,327	88,327			
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040					
Subordinated mutual member accounts	R0050					
Non-available subordinated mutual member accounts at group level	R0060					
Surplus funds	R0070					
Non-available surplus funds at group level	R0080		-			
Preference shares	R0090					
Non-available preference shares at group level	R0100					
Share premium account related to preference shares	R0110					
Non-available share premium account related to preference shares at group level	R0120					
Reconciliation reserve	R0130	(91,351)	(91,351)			
Subordinated liabilities	R0140					
Non-available subordinated liabilities at group level	R0150					
An amount equal to the value of net deferred tax assets	R0160					
The amount equal to the value of net deferred tax assets not available at the group level	R0170					
Other items approved by supervisory authority as basic own funds not specified above	R0180					
Non available own funds related to other own funds items approved by supervisory authority	R0190					
Minority interests (if not reported as part of a specific own fund item)	R0200					
Non-available minority interests at group level	R0210					
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds						
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220					
Deductions						
Deductions for participations in other financial undertakings, including non-regulated undertakings carrying out financial activities	R0230					
whereof deducted according to art 228 of the Directive 2009/138/EC	R0240					
Deductions for participations where there is non-availability of information (Article 229)	R0250					
Deduction for participations included by using D&A when a combination of methods is used	R0260					
Total of non-available own fund items	R0270					
Total deductions	R0280					
Total basic own funds after deductions	R0290	210,744	210,744			
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300					
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310					
Unpaid and uncalled preference shares callable on demand	R0320					
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330					
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340					
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350					
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360					
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370					
Non available ancillary own funds at group level	R0380					
Other ancillary own funds	R0390					
Total ancillary own funds	R0400					
Own funds of other financial sectors						
Credit institutions, investment firms, financial institutions, alternative investment fund managers, UCITS management companies – total	R0410					
Institutions for occupational retirement provision	R0420					
Non regulated entities carrying out financial activities	R0430					
Total own funds of other financial sectors	R0440					
Own funds when using the D&A, exclusively or in combination of method 1						
Own funds aggregated when using the D&A and combination of method	R0450					
Own funds aggregated when using the D&A and combination of method net of IGT	R0460					
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)	R0520	210,744	210,744			
Total available own funds to meet the minimum consolidated group SCR	R0530	210,744	210,744			
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)	R0560	210,744	210,744			
Total eligible own funds to meet the minimum consolidated group SCR	R0570	210,744	210,744			
Minimum consolidated Group SCR	R0610	20,310				
Ratio of Eligible own funds to Minimum Consolidated Group SCR	R0650	1037.6%				
Total eligible own funds to meet the group SCR (including own funds from other financial sector and from the undertakings included via	R0660	210,744	210,744			
Group SCR	R0680	83,304				
Ratio of Eligible own funds to group SCR including other financial sectors and the undertakings included via D&A	R0690	252.98%				

		C0060
Reconciliation reserve		
Excess of assets over liabilities	R0700	210,744
Own shares (held directly and indirectly)	R0710	
Foreseeable dividends, distributions and charges	R0720	
Other basic own fund items	R0730	302,095
Adjustment for restricted own fund items in respect of matching adjustm	R0740	0
Other non available own funds	R0750	
Reconciliation reserve	R0760	(91,351)
Expected profits		
Expected profits included in future premiums (EPIFP) - Life business	R0770	
Expected profits included in future premiums (EPIFP) - Non-life business	R0780	4,756
Total Expected profits included in future premiums (EPIFP)	R0790	4,756

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Solvency Capital Requirement - for groups on Standard Formula

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Basic Solvency Capital Requirement

		Gross solvency capital requirement	Simplifications
		C0110	C0120
Market risk	R0010	32,179	
Counterparty default risk	R0020	13,849	
Life underwriting risk	R0030	-	
Health underwriting risk	R0040	52,418	
Non-life underwriting risk	R0050	-	
Diversification	R0060	- 24,933	
Intangible asset risk	R0070		
Basic Solvency Capital Requirement	R0100	73,513	

Basic Solvency Capital Requirement (USP)

		USP
		C0090
Life underwriting risk	R0030	
Health underwriting risk	R0040	
Non-life underwriting risk	R0050	

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Calculation of Solvency Capital Requirement

		Value
		C0100
Operational risk	R0130	9,791
Loss-absorbing capacity of technical provisions	R0140	
Loss-absorbing capacity of deferred taxes	R0150	
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	
Solvency Capital Requirement excluding capital add-on	R0200	83,304
Capital add-ons already set	R0210	
Solvency capital requirement for undertakings under consolidated method	R0220	83,304
Other information on SCR		
Capital requirement for duration-based equity risk sub-module	R0400	
Total amount of Notional Solvency Capital Requirements for remaining part	R0410	63,312
Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420	19,992
Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	R0430	
Diversification effects due to RFF nSCR aggregation for article 304	R0440	
Minimum consolidated group solvency capital requirement	R0470	20,310
Information on other entities		
Capital requirement for other financial sectors (Non-insurance capital requirements)	R0500	
Capital requirement for other financial sectors (Non-insurance capital requirements) - Credit institutions, investment firms and financial institutions, alternative investment funds managers, UCITS management companies	R0510	
Capital requirement for other financial sectors (Non-insurance capital requirements) - Institutions for occupational retirement provisions	R0520	
Capital requirement for other financial sectors (Non-insurance capital requirements) - Capital req	R0530	
Capital requirement for non-controlled participation requirements	R0540	
Capital requirement for residual undertakings	R0550	
Overall SCR		
SCR for undertakings included via D and A	R0560	
Solvency capital requirement	R0570	83,304

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Undertakings in the scope of the group

							Criteria of influence						Inclusion in the scope of Group supervision		Group solvency calculation
Identification code and type of code of the undertaking	Country	Legal Name of the undertaking	Type of undertaking	Legal form	Category (mutual/non mutual)	Supervisory Authority	% capital share	% used for the establishment of consolidated accounts	% voting rights	Other criteria	Level of influence	Proportional share used for group solvency calculation	Yes/No	Date of decision if art. 214 is applied	Method used and under method 1, treatment of the undertaking
C0020	C0010	C0040	C0050	C0060	C0070	C0080	C0180	C0190	C0200	C0210	C0220	C0230	C0240	C0250	C0260
LEI/213800TFKO1YDOJNQ602	UNITED KINGDOM	Aetna Insurance Company Limited	3 - Non-Life undertakings	Company limited by shares	2 - Non-mutual	Prudential Regulation Authority	100	100	100	-	1 - Dominant	100	Included into scope of group supervision		Method 1: Full consolidation
SC/213800B2XML69WGYEH58/GB/00002	UNITED KINGDOM	Aetna Global Benefits (UK) Limited	Ancillary services undertaking as defined in Article 1 (53) of Delegated Regulation (EU) 2015/35	Company limited by shares	2 - Non-mutual	Financial Conduct Authority	100	100	100	-	1 - Dominant	100	Included into scope of group supervision		Method 1: Full consolidation
SC/213800B2XML69WGYEH58/GB/00003	UNITED KINGDOM	Aetna Holdco (UK) Limited	Insurance holding company as defined in Art. 212§ [f] of Directive 2009/138/EC	Company limited by shares	2 - Non-mutual		100	100	100	-	1 - Dominant	100	Included into scope of group supervision		Method 1: Full consolidation
LEI/213800B2XML69WGYEH58	UNITED KINGDOM	Spinnaker Bidco Limited	Insurance holding company as defined in Art. 212§ [f] of Directive 2009/138/EC	Company limited by shares	2 - Non-mutual								Included into scope of group supervision		Method 1: Full consolidation