

Travelers Insurance Designated  
Activities Company

2022  
ANNUAL REPORT

TRAVELERS 



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## The Company

### *Directors*

<b>Brian Lehane</b>	Ireland (Independent Non-Executive)
<b>Ian Britchfield</b>	Ireland (Independent Non-Executive)
<b>James Liston</b>	Ireland (Executive)
<b>Kevin Smith</b>	USA (Non-Executive) (resigned 17 February 2022)
<b>Maria Olivo</b>	USA (Non-Executive)
<b>Mike Lawton</b>	UK (Non-Executive)

### *Company Secretary*

<b>Esterina Fiore</b>	UK
<b>John Abramson</b>	UK (resigned 30 September 2022)

### *Registered Office*

Third Floor Block 8, Harcourt Centre, Charlotte Way, Dublin 2, Ireland

Registered in Ireland No. 620416

### *Bankers*

Barclays Bank Plc, 1 Molesworth St, Dublin 2, Ireland  
Citibank N.A., CGC Centre, Canary Wharf, London, UK

### *Auditor*

Mazars  
Chartered Accountants and Statutory Audit Firm  
Harcourt Centre, Block 3, Harcourt Road, Dublin 2, Ireland

### *Solicitors*

Matheson  
70 Sir John Rogerson's Quay, Dublin 2, Ireland

## Directors' Report

The Directors present their annual report together with the audited financial statements for the year ended 31 December 2022.

### Principal activity

In 2022, Travelers Insurance Designated Activity Company (the "Company") wrote commercial lines insurance in the Republic of Ireland, and in the United Kingdom ("UK") through its branch located in London. The Company also covered risks located outside of Ireland and the UK, on a freedom of services basis (in the EEA) or by facultative reinsurance (outside of the EEA), generally in support of its Irish and UK based insureds.

### Business review and results for the year

In 2022, the Company reported a profit after tax of €10.2million (2021 profit after tax €2.9 million) and a combined ratio of 77.2% (2021 88.5%).

Gross premiums written ("GWP") were €239.1 million (2021 €215.8 million). The two most material lines of business were Third Party Liability and Fire and Other Damage to Property, which respectively comprised 71.6% (2021 71.2%) and 21.8% (2021 22.7%) of GWP in 2022. Further information on the split of GWP by line of business and geographical location of insurance risk can be seen in Note 4. The increase in GWP year on year is predominantly driven by growth in Third Party Liability lines of business due to strong retention and rate, leveraging from the significant rate and new business achievements in 2021 on Financial Line classes.

Net earned premiums ("NEP") were €41.4 million for 2022 (2021 €34.2 million). Claims incurred and operating expenses were €23.2 million (2021 €20.7 million) and €8.7 million (2021 €9.5 million) respectively, with a loss ratio of 56.1% (2021 60.6%) and an expense ratio of 21.1% (2021 27.9%).

While the Company continues to monitor developments as a result of the Covid-19 pandemic ("Covid-19"), the rulings of the UK Supreme and Irish High court early in 2021 were in line with the Company's expectations and consistent with its reserving assumptions and there have been no further developments of this position in 2022. On this basis no additional reserving actions with respect to Covid-19 were taken in 2021 or 2022. The loss ratio improvement reflects favourable prior year development, netting against reserve actions taken to accommodate uncertainty within the current economic environment.

Following the onset of Covid-19 in 2020, the Company's immediate priorities were the safety and health of our staff and providing a continuity of service to our insureds and brokers. Throughout 2021 and 2022, we have maintained our dedication to ensuring the well-being of our staff, including continuing to offer mental health support and enhanced levels of communication from management at all levels.

A geopolitical conflict in Ukraine arose in early 2022, which resulted in the Company assessing any potential material exposures to Russia and Ukraine. No material exposures were identified, and controls were put in place to identify any potential exposure to new risks. The Company has not had material exposures to Russia and Ukraine in 2021 or 2022.

### Key Performance Indicators ("KPIs")

The below table show the most relevant KPIs the Directors use to manage the business. These KPIs are discussed further in the financial results section of the Business review and results above.

	2022 €000	2021 €000
Gross premiums written	239,136	215,800
Profit for the financial year	10,201	2,941
Loss ratio	56.1%	60.6%
Expense ratio	21.1%	27.9%
Combined ratio	77.2%	88.5%

The loss ratio represents the claims incurred as a percentage of earned premium, both net of reinsurance. The expense ratio represents the commission and operating expenses as a percentage of earned premium, both net of reinsurance. The combined ratio is the loss ratio plus expense ratio.

### Financial instruments

The investment return was a gain of €1.0 million (2021 gain €0.5 million). The Company invests in high quality corporate and government bonds with an average credit quality of AA. Investments under management at 31 December 2022 totalled €184.2 million (2021 €144.8 million). In 2022 there was volatility in investment markets as a result of ongoing supply chain disruption, geopolitical conflict and fiscal measures put in place due to high inflationary environments. This volatility underlines the importance of achieving underwriting profits to achieve target level of returns. The impact of these conditions resulted in an increase in the unrealised loss position by €14.7 million (2021 €2.2 million). It is anticipated the increase in interest rates by Central Banks will benefit the Company's future investment returns. While the unrealised loss position is being monitored, at present no change to the Company's investment strategy is deemed necessary.

### Trading environment and future developments

Due to ongoing developments with respect to Covid-19, the geopolitical conflict between Russia and Ukraine and the high inflationary environment, there was uncertainty surrounding the trading environment entering into 2022. The Company continued to focus on improving underwriting profitability through managing the mix of business written towards higher margin products. While European and UK Financial Line markets softened during the year, the Company continued to achieve strong retention and rate, leveraging from the significant rate and new business achievements in 2021 on these classes, to maintain its underwriting profitability.

## Directors' Report *continued*

### Trading environment and future developments

*continued*

The markets the Company operates in remain competitive. The Company will continue to focus on maintaining underwriting profitability through managing the mix of business and risks throughout Europe and the UK.

### Capital management

The Company was in compliance with its regulatory capital requirements throughout the year and through to the date of this report.

The Company's financial strength is strong with net assets at 31 December 2022 of €127.1 million (2021 €96.3 million). As of the date of this report the Company's financial strength ratings are A++ (Superior) from AM Best and AA- from Standard and Poor's.

During 2022, the parent company, Travelers Insurance Company Limited ("TICL") provided a capital injection of €35.0 million in return for the issuance of 35 million new €1 ordinary shares in order to support the Company's ongoing growth. Following this issuance of share capital the Company had issued €100m approved allocated share capital. On 15 February 2023, an increase in the allocated share capital to €200m was approved.

### Dividends

During 2022 the Company did not pay a dividend (2021 €nil).

### Brexit

The Company was established as a subsidiary of TICL in 2018 in order to enable the European operations of the ultimate parent company, The Travelers Companies, Inc., to continue servicing its European customers. The Company received its authorisation from the Central Bank of Ireland on 28 January 2019 and commenced trading from 1 April 2019. The establishment of the Company allows Travelers Europe to continue to access the European market on a freedom of services basis following the departure of the UK from the European Union ("EU").

The UK exit from the EU was effective from 11pm on 31 December 2020, at which time the Brexit transitional arrangement ended. The Company had appropriate arrangements in place in order to enable the Travelers Companies, Inc. to continue trading within the EU and UK. The Company has a UK branch which is authorised by the Prudential Regulation Authority ("PRA") and Financial Conduct Authority ("FCA") in the UK under the Temporary Permissions Regime ("TPR"). The Company's third country branch application to the PRA was made in 2022, with authorisation anticipated in 2023.

### Principal Risks and Uncertainties

The Board sets the risk appetite and reviews it on a formal basis annually as part of the business planning process. This is reviewed on an ongoing basis as part of its regular business review processes. The Company has a Board Risk and Remuneration Committee and management participates in a European Executive Risk Committee which meet regularly to review and update risks and issues arising from the risk register and to monitor performance against risk appetite using a series of key risk indicators. The European Executive Risk Committee consists of members of management from The Travelers Companies, Inc. European operations. The principal risks and uncertainties facing the Company are as set out below.

#### Insurance risk

Insurance risk relates to underwriting, claims management and the risk that arises from the inherent uncertainties as to the occurrence, amount and timing of insurance liabilities.

The Company manages insurance risk by setting an appetite annually through the business planning process, which sets down targets for underwriting volumes, pricing sufficiency and retentions by class of business. Management monitors performance against the business plan throughout the year. The Company uses catastrophe modelling software to model the maximum probable loss from catastrophe exposed business. Reserve adequacy is monitored through quarterly internal actuarial review. The European Underwriting Committee oversees underwriting risk and the Finance Committee oversees reserving risk. The European Underwriting Committee consists of members of management from The Travelers Companies, Inc. European operations.

One aspect of insurance risk is the risk of changing climate conditions. This is discussed further below.

#### Inflation risk

There was a high inflationary environment throughout 2022. The Company continually monitors and reviews the potential effect of inflation on the value of its insurance liabilities and pricing of risks. The Company has considered the effects of inflation in pricing risks, including in 2022. The Company's insurance liabilities include the effects of inflation as well as other societal and economic factors, and inflation has not caused a material impact on its results to date. The Company has carefully considered the impact of the current inflationary environment on its business plan and has reviewed the inflation assumptions for all classes. The key assumptions impacting the loss ratios are the excess inflation, the proportion of the exposure inflation assumed to be captured within pricing, and how long the higher inflationary environment lasts.

## Directors' Report *continued*

### Principal Risks and Uncertainties

*continued*

#### Credit risk

The primary source for credit risk arises from the risk of default by one or more of the Company's reinsurers or investment counterparties. The Company benefits from The Travelers Companies, Inc. European policy for the selection of reinsurers and managing the quantum of exposure ceded to an individual reinsurer. Exposures to individual investment counterparties are monitored against agreed limits and the overall investment portfolio has an average credit quality of AA. The Finance Committee oversees this risk type.

In addition, the Company has an 80% Whole Account Quota Share ("Quota Share") arrangement in place with TICL, its immediate parent. The net premiums paid by the Company to TICL are held within an escrow account. The assets held within the escrow account cannot be released to TICL until the assets within the account exceed the associated liabilities and not before 31 December 2022, and from thereafter on a bi-annual basis. Claims payable relating to the Quota Share can be funded from the escrow account.

#### Market risk

The primary source of market risk is the risk of adverse movements in net assets due to movements in interest rates, currency rates and the market value of securities. Market risk exposures are monitored through the Finance Committee.

One aspect of market risk is the risk of changing climate conditions. This is discussed further in the Directors report.

In 2022 there was volatility in investment markets as a result of ongoing supply chain disruption, geopolitical conflict and fiscal measures put in place due to high inflationary environments. The impact of these conditions resulted in a decrease in the market value of the investment portfolio, while an increase in interest rates will benefit the Company's investment returns.

#### Operational risk

The primary source of operational risk is the failure of people, processes or systems. These risks are managed through well documented policies and procedures, sound internal control processes and business continuity management procedures. Operational risks are monitored by the European Executive Risk Committee.

#### Regulatory risk

Regulatory risk comprises the failure to comply with relevant regulations and laws. During the year the Company was in full compliance with the capital requirements required by its regulator, the Central Bank of Ireland. There were no changes in the Company's approach to capital risk management during the year.

#### Conduct risk

Conduct risk is the risk that the Company (or its agents) will fail to pay due regard to the interests of its customers or will fail to treat them fairly at all times. Conduct risk exposures are monitored through the European Executive Risk Committee.

#### Liquidity risk

Liquidity risk is the risk that the Company is unable to meet operational cash flow requirements. Liquidity risk is monitored through the Finance Committee.

### Directors and secretaries' interests

The Directors and secretaries are set out on page 2. The Directors and secretaries who held office at 31 December 2022 and 31 December 2021 had no interests greater than 1% in the shares of, or debentures or loan stock of, the Company or group companies at the beginning (or date of appointment, if later) or end of the year.

### Disclosure of information to the auditors

The Directors who held office at the date of approval of this Directors' Report confirm that, so far as they are aware, there is no relevant audit information of which the Company's auditor is unaware, and each Director has taken all the steps that ought to have been taken as a director to be aware of any relevant audit information and to establish that the Company's auditor is aware of that information.

### Audit committee

The Board has an established Audit Committee (the "Committee"). The Committee meets at least four times a year. The Committee comprises of two independent non-executive directors. Brian Lehane has been Chairman of the Audit Committee throughout 2022. The Committee's terms of reference require it to take an independent view of the Company's external financial reporting, accounting policies and practices. It considers the appointment and fees, both audit and non-audit, of the external auditors. The Committee also reviews the annual plans of both the external and internal auditors and reviews reports received from both in respect of their findings. The Chief Financial Officer, Head of Internal Audit, Head of Actuarial Function and the Company Secretary usually attend the Committee meetings. At least once a year the Committee will meet, both on its own and with the external auditors, without executive management being present.

## Directors' Report *continued*

### Going concern

The Directors have assessed the suitability of using the going concern assumption in preparing these accounts. In making this assessment they have looked forward for a period of twelve months from the date that these accounts are signed. Due to the nature of the business, and the investment and planning periods involved, there are no dates after this period that are material to the assessment of going concern. The Company does not have any external debt nor is it dependent on any banking facilities. The Directors have prepared these accounts on the going concern basis. In doing so the Directors considered the latest three year business plan and the likely trading environment. The Directors concluded that it remained appropriate to continue to prepare the Company's financial statements using the Going Concern assumption.

### Accounting records

The Directors believe that they have complied with the requirements of Sections 281 to 285 of the Companies Act 2014 with regard to adequate accounting records by employing accounting personnel with appropriate expertise and by providing adequate resources to the financial function. The accounting records of the Company are maintained at Third Floor, Block 8, Harcourt Centre, Charlotte Way, Dublin 2, Ireland.

### Post balance sheet events

On 14 March 2023, an increase of €1 authorised ordinary shares from 100 million to 200 million was approved by the Board.

### Indemnity insurance

The Directors benefited from qualifying third party indemnity provisions in place during the financial year and as at the date of this report.

### Supplier payment policies

All third party supplier invoices are settled on the Company's behalf by Travelers Management Limited ("TML"), an affiliate of the Company. The average payment terms are disclosed in that Company's accounts. The Company also has a management agreement with TML, who employs some of the Company's personnel. The Company employs 6 personnel directly who are paid by TML for which the expenses are charged to the Company. The employment policies are also disclosed in TML's accounts.

### Climate reporting

The Company follows The Travelers Companies, Inc. in its approach to climate-related risks and opportunities. The approach is multi-faceted and allows the Company to mitigate exposure to climate-related risks and provide products and services that both help customers mitigate those risks and support the transition to a low carbon economy. In the latter regard, the Company provides insurance coverage to the Renewable Energy Sector.

As part of its regular risk management activities, the Company's Board of Directors and its Risk and Remuneration Committee consider changing climate conditions, including changes in frequency and severity of catastrophe losses and uncertainty surrounding weather volatility and climate-related risk, and the impact on investment valuations that may occur as part of the transition to a low carbon economy.

The Company's underwriting risk appetite is dependent on the ability to understand the property and casualty risks that it underwrites. Understanding the climate-related impacts on insured perils is part of this fundamental risk evaluation process. Core to this strategy is the incorporation of climate variability into underwriting and pricing decisions. The Company is also committed to supporting our clients with meaningful risk management and insurance capacity to help them transition to a low carbon future.

Market Risk is managed by employing a thoughtful and responsible investment philosophy that focuses on appropriate risk-adjusted returns. The investment strategy, approved by the Board of Directors, reflects a long-term approach to sustainable value creation and requires that Travelers consider environmental, social and governance ("ESG") factors in the investment process to the extent relevant.

As part of the Company's annual Own Risk and Solvency Assessment ('ORSA') process, two stress scenarios relating to changing climate conditions were considered and applied to the current balance sheet. Keeping the significant uncertainties associated with climate stress testing in mind, these scenarios took into consideration the insurance and market risks noted above, and in both scenarios the potential impacts on the Company's modelled capital position were modest.

### Political contributions

Political contributions were €nil during 2022 (2021 €nil).

### Central Bank of Ireland Corporate Governance Code

The Company is subject to the Corporate Governance Requirements for Insurance Undertakings issued by the Central Bank of Ireland. The Company is a non-high impact designated institution on the Central Bank of Ireland's PRISM scale and as such is not required to comply with the additional requirements for major institutions.

### Auditors

The statutory auditors, Mazars, Chartered Accountants and Statutory Audit firm, will continue in office in accordance with section 383(2) of the Companies Act 2014.

## Directors' Report *continued*

### Statement of Directors' compliance

The Directors of the Company acknowledge that they are responsible for securing the Company's compliance with its relevant obligations as defined by Section 225 (2) of the Companies Act 2014.

The Directors confirm that:

- a compliance policy statement setting out the Company's policies with regard to complying with the relevant obligations under the 2014 Act has been prepared;
- arrangements and structures have been put in place that they consider sufficient to secure material compliance with the Company's relevant obligations; and
- a review of the arrangements and structures has been conducted during the financial year to which this Directors' report relates.

### Statement of Directors' responsibilities

The Directors are responsible for preparing the Directors' Report and the financial statements in accordance with applicable law and regulations.

Company law requires the Directors to prepare financial statements for each financial year. Under that law they have elected to prepare the financial statements in accordance with FRS 102, "The Financial Reporting Standard applicable in the UK and Republic of Ireland" and FRS 103, "Insurance Contracts".

Under company law the Directors must not approve the financial statements unless they are satisfied that they give a true and fair view of the assets, liabilities and financial position of the Company and of its profit or loss for that year. In preparing these financial statements, the Directors are required to:

- select suitable accounting policies and then apply them consistently;
- make judgements and estimates that are reasonable and prudent;
- state whether applicable Accounting Standards have been followed, subject to any material departures disclosed and explained in the financial statements;
- assess the Company's ability to continue as a going concern, disclosing as applicable, matters related to going concern; and
- use the going concern basis of accounting unless they either intend to liquidate the Company or cease operations, or have no realistic alternative but to do so.

The Directors are responsible for keeping adequate accounting records which disclose with reasonable accuracy at any time the assets, liabilities, financial position and profit or loss of the Company and enable them to ensure that the financial statements comply with the Companies Act 2014 and the European Union (Insurance Undertakings: Financial

Statements) Regulations 2015. They are responsible for such internal controls as they determine is necessary to enable the preparation of financial statements that are free from material misstatement whether due to fraud or error, and they have general responsibility for taking such steps as are reasonably open to them to safeguard the assets of the Company and to prevent and detect fraud and other irregularities. The Directors are also responsible for preparing a Directors' Report that complies with the requirements of the Companies Act 2014.

On behalf of the Board

#### Mike Lawton

Director  
4 April 2023

#### James Liston

Director  
4 April 2023

Third floor, Block 8, Harcourt Centre,  
Charlotte Way Dublin 2. Ireland

# Independent auditor's report to the members of Travelers Insurance DAC

## Report on the audit of the financial statements

### Opinion

We have audited the financial statements of Travelers Insurance DAC ('the Company') for the year ended 31 December 2022, which comprise the balance sheet, profit and loss account (technical and nontechnical), statement of comprehensive income/loss, the statement of changes in equity and the related notes to the Company financial statements, including the summary of significant accounting policies as set out in note 2. The financial reporting framework that has been applied in their preparation is the Companies Act, 2014, FRS 102 "The Financial Reporting Standard applicable in the UK and Republic of Ireland" and FRS 103 "Insurance Contracts" issued in the United Kingdom by the Financial Reporting Council.

In our opinion, the financial statements:

- give a true and fair view of the assets, liabilities and financial position of the Company as at 31 December 2022 and of its result for the year then ended;
- have been properly prepared in accordance with FRS 102 "The Financial Reporting Standard applicable in the UK and Republic of Ireland" and FRS 103 "Insurance Contracts"; and
- have been properly prepared in accordance with the requirements of the Companies Act, 2014.

### Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (Ireland) ('ISAs (Ireland)') and applicable law. Our responsibilities under those standards are further described in the "Auditor's responsibilities for the audit of the financial statements" section of our report.

We are independent of the Company in accordance with the ethical requirements that are relevant to our audit of financial statements in Ireland, including the Ethical Standard for Auditors (Ireland) issued by the Irish Auditing and Accounting Supervisory Authority ('IAASA') applied as required for the types of entity determined to be appropriate in the circumstances. 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 financial statements, we have concluded that the directors' use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Our audit procedures to evaluate the directors' assessment of the Company's ability to continue to adopt the going concern basis of accounting included but were not limited to the following:

- assessed the appropriateness of management's going concern assessment process;
- reviewed the reasonableness of the financial information contained within this assessment;
- evaluated management's future business plan and challenged growth rate assumptions used in forecasting income;
- challenged and benchmarked the underlying key assumptions applied as part of the process, as compared to best practice and industry expectations;
- considered other corroborative supporting evidence / analysis to substantiate the conclusions presented in this assessment;
- determined whether current key events have been appropriately considered and reflected in the assessment performed by management; and,
- ensured that there is sufficiency of disclosures in the financial statements pertaining to the going concern assessment.

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 at least twelve months from the date when the financial statements 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.

## Independent auditor's report to the members of Travelers Insurance DAC *continued*

### Key audit matters

Key audit matters are those matters that, in our professional judgement, were of most significance in our audit of the financial statements of the current financial year and include the most significant assessed risks of material misstatement (whether or not due to fraud) identified by the auditor, including those which had the greatest effect on: the overall audit strategy, the allocation of resources in the audit and directing the efforts of the engagement team. These matters were addressed in the context of our audit of the financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

We summarise below the key audit matter in forming our audit opinion above, together with an overview of the principal audit procedures performed to address each matter and, where relevant, key observations arising from those procedures.

Valuation of technical provisions	How our audit addressed this key audit matter
<p>The true and fair presentation of the Company's financial position and operating results depends significantly, on the reasonableness and adequacy of technical provisions.</p> <p>The valuation of technical provisions is an inherently complex process and there is a potential risk of errors in the data, assumptions, methodology and / or the models utilised in the actuarial valuation of them. Additionally, the overall growth of the business over the past year adds a further layer of complexity to the reserving process.</p> <p>Additionally, the growth of the business over the past year adds a further layer of complexity to the reserving process.</p> <p>Technical provisions (excluding UPR) amounted to €379m as at 31 December 2022 (2021: €304m).</p> <p>Refer to the accounting policy in note 2 and the disclosures in note 22 of the financial statements.</p>	<p>We addressed this risk with the assistance of our actuarial specialists through the following procedures:</p> <ul style="list-style-type: none"> <li>– performed walkthrough procedures to obtain an understanding of the overall reserving process and assessed the design and implementation and operating effectiveness of controls over premiums, claims data and the overall reserving process;</li> <li>– performed data integrity testing on the completeness and accuracy of claims data, and confirmed that the data utilised in the reserving models is consistent with the audit work performed over premiums, claims paid and case reserves;</li> <li>– on a sample basis, tested reported claims reserves (area of audit focus) to supporting documentation and assessed the appropriateness of the reserve booked based on supporting documentation of the claims and convened discussions with relevant claims handlers to obtain an understanding of the rationale for setting the reserves, where applicable;</li> <li>– performed an independent best estimate re-projections on the most significant components (c.71%) of the booked gross reserves;</li> <li>– performed diagnostics analysis on all ongoing lines of business (c.85%) as applicable to gross reserves;</li> <li>– challenged key areas of uncertainty and actuarial assumptions and evaluated the appropriateness of the reserving methodologies applied by management to establish Incurred But Not Reported reserves ("IBNR"), and any changes arising since the previous year-end;</li> <li>– considered the continued impact of key events and reviewing any resulting change in actuarial reserving assumptions and methodology as a result of these;</li> <li>– evaluated the technical provisions against our knowledge of recent legal developments, claims notifications and settlement trends across the classes of business underwritten by the Company;</li> <li>– reviewed the appropriateness of the calculated Unallocated Loss Adjustment Expenses reserve ("ULAE");</li> <li>– assessed the impact of reinsurance arrangements on the level of technical provisions; and</li> <li>– considered the adequacy and completeness of the relevant disclosures in the financial statements, including adherence to the Company's reserving policy.</li> </ul> <p>Based on the work performed, review of supporting documentation and discussions with the management, we conclude that the valuation of technical provisions is reasonable.</p>

## Independent auditor's report to the members of Travelers Insurance DAC *continued*

### Our application of materiality

We apply the concept of materiality in planning and performing the audit and in evaluating the impact of misstatements, if any. Materiality is an expression of the relative significance or importance of a matter in the context of the financial statements.

Misstatements in the financial statements are material if they, individually or in aggregate, could reasonably be expected to influence the economic decisions of users taken based on the financial statements.

The scope of our audit was influenced by our application of materiality. We set certain quantitative thresholds for materiality. These, together with qualitative considerations, helped us to determine the scope of our audit and the nature, timing and extent of our audit procedures on the individual financial statement line items and disclosures and in evaluating the effect of misstatements, both individually and on the financial statements as a whole.

Based on our professional judgement, we determined materiality for the financial statements as a whole as follows:

Overall materiality	€ 2.38m
How we determined it	1% of Gross Written Premium
Rationale for benchmark applied	In determining our materiality, we have applied professional judgement and considered those financial metrics, which we believed to be relevant, and concluded that gross written premium was the most relevant benchmark.  In our view, this is a metric against which the Company is commonly measured by its stakeholders.
Performance materiality	Performance materiality is set to reduce to an appropriately low level the probability that the aggregate of uncorrected and undetected misstatements in the financial statements exceeds materiality for the financial statements as a whole.  We set performance materiality at €1.55m which represents 65% of overall materiality.  The primary factors that we considered in determining the level of performance materiality include our understanding of the Company's control environment; the level and nature of errors detected in previous audits and our expectation of the number of errors in the current year audit.
Reporting threshold	We agreed with the directors that we would report to them misstatements identified during our audit in excess of €71k as well as misstatements below that amount that, in our opinion, warranted reporting for qualitative reasons.  We also report to the directors on disclosure matters that we identified when assessing the overall presentation of the financial statements.

### Overview of the scope of our audit

As part of designing our audit, we assessed the risk of material misstatement in the financial statements, whether due to fraud or error, and then designed and performed audit procedures responsive to those risks. In particular, we looked at where the directors made subjective judgements such as making assumptions on significant accounting estimates.

We tailored the scope of our audit to ensure that we performed sufficient work to be able to give an opinion on the financial statements as a whole. We used the outputs of a risk assessment, our understanding of the Company, its environment, controls and critical business processes, to consider qualitative factors in order to ensure that we obtained sufficient coverage across all financial statement line items.

As an output of this process, we involved our actuarial and Information Technology ('IT') specialists as part of our engagement team and determined the scope and nature of audit procedures to be performed. Additionally we engaged third party firms as auditors experts and instructed the experts to perform procedures over the financial investments and IT controls over centrally hosted systems.

Where the audit procedures were performed by specialists and experts, we issued and agreed audit instructions to ensure that appropriate audit evidence was obtained as a basis for our opinion on the financial statements as a whole.

# Independent auditor's report to the members of Travelers Insurance DAC *continued*

## Other information

The directors are responsible for the other information. The other information comprises of the information included in the annual report other than the financial statements and our auditors' report thereon. Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in our report, we do not express 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 financial statements 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 financial statements or a material misstatement of the other information. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact.

We have nothing to report in this regard.

## Opinions on other matters prescribed by the Companies Act 2014

In our opinion, based on the work undertaken in the course of the audit, we report that:

- the information given in the directors' report for the financial year for which the financial statements are prepared is consistent with the financial statements;
- the directors' report has been prepared in accordance with applicable legal requirements;
- the accounting records of the Company were sufficient to permit the financial statements to be readily and properly audited; and
- the financial statements are in agreement with the accounting records.

We have obtained all the information and explanations which, to the best of our knowledge and belief, are necessary for the purposes of our audit.

## Matters on which we are required to report by exception

Based on the knowledge and understanding of the Company and its environment obtained in the course of the audit, we have not identified any material misstatements in the directors' report.

The Companies Act, 2014 requires us to report to you if, in our opinion, the requirements of any of Sections 305 to 312 of the Act, which relate to disclosures of directors' remuneration and transactions are not complied with by the Company.

We have nothing to report in this regard.

## Respective responsibilities

### Responsibilities of directors for the financial statements

As explained more fully in the statement of directors' responsibilities set out on page 6, the directors are responsible for the preparation of the financial statements in accordance with the applicable financial reporting framework that give a true and fair view, and for such internal controls as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the directors are responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the directors either intends to liquidate the Company or to cease operations, or has no realistic alternative but to do so.

### Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditors' report that includes our opinion. Reasonable assurance is a high level of assurance but is not a guarantee that an audit conducted in accordance with ISAs (Ireland) 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 economic decisions of users taken on the basis of these financial statements.

Irregularities, including fraud, are instances of non-compliance with laws and regulations.

We design procedures in line with our responsibilities, outlined above, to detect material misstatements in respect of irregularities, including fraud. The extent to which our procedures are capable of detecting irregularities, including fraud is detailed below.

Based on our understanding of the Company and the insurance sector in which it operates, we identified that the principal risks of non-compliance with laws and regulations related to non-compliance with the Central Bank of Ireland ("CBI") regulations and we considered the extent to which non-compliance might have a material effect on the financial statement.

## Independent auditor's report to the members of Travelers Insurance DAC *continued*

### Respective responsibilities *continued*

#### Auditor's responsibilities for the audit of the financial statements *continued*

In identifying and assessing risks of material misstatement in respect to irregularities including non-compliance with laws and regulations, our procedures included but were not limited to:

- gaining an understanding of the legal and regulatory framework applicable to the Company, the industry in which it operates and considered the risk of acts by the Company which were contrary to the applicable laws and regulations;
- discussing with the directors and management the policies and procedures in place regarding compliance with laws and regulations;
- discussing amongst the engagement team the identified laws and regulations, and remaining alert to any indications of non-compliance; and
- focusing on areas of laws and regulations that could reasonably be expected to have a material effect on the financial statements from our general commercial and sector experience and through discussions with the directors (as required by auditing standards), from inspection of the Company's, regulatory and legal correspondence and review of minutes of directors' meetings in the year.

We also considered those laws and regulations that have a direct impact on the preparation of the financial statements, such as Irish tax law, the Irish Companies Act 2014 and the European Union (Insurance Undertakings: Financial Statements) Regulation 2015 (Amendment).

Our procedures in relation to fraud included but were not limited to:

- making enquiries of the directors and management on whether they had knowledge of any actual, suspected or alleged fraud;
- gaining an understanding of the internal controls established to mitigate risks related to fraud;
- discussing amongst the engagement team on the risks of fraud such as opportunities for fraudulent manipulation of financial statements, and determined that the principal risks were related to posting manual journal entries to manipulate financial performance, management bias through judgements and assumptions in significant accounting estimates, and significant one-off or unusual transactions; and
- addressing the risks of fraud through management override of controls by performing journal entry testing.

The primary responsibility for the prevention and detection of irregularities including fraud rests with both those charged with governance and management. As with any audit, there remained a risk of non-detection of irregularities, as these may involve collusion, forgery, intentional omissions, misrepresentations or the override of internal controls.

As a result of our procedures, we did not identify any key audit matters relating to irregularities. The risks of material misstatement that had the greatest effect on our audit, including fraud, are discussed under "Key audit matters" within this report.

A further description of our responsibilities for the audit of the financial statements is located on IAASA's website at: [http://iaasa.ie/getmedia/b2389013-1cf6-458b-9b8f-a98202dc9c3a/Description\\_of\\_auditors\\_responsibilities\\_for\\_audit.pdf](http://iaasa.ie/getmedia/b2389013-1cf6-458b-9b8f-a98202dc9c3a/Description_of_auditors_responsibilities_for_audit.pdf).

This description forms part of our auditors' report.

#### Other matters which we are required to address

Following the recommendation of the Audit Committee, we were appointed by Company on 14 July 2021 to audit the financial statements for the year ended 31 December 2021 and subsequent financial periods. The period of total uninterrupted engagement including previous renewals and reappointments is two years, covering the year ended 31 December 2021 to 31 December 2022.

No non-audit services prohibited by IAASA's Ethical Standard were performed during the period under review and we remain independent of the Company in conducting the audit.

Our audit opinion is consistent with the additional report to the Board of Directors, which we are required to provide in accordance with ISA (Ireland) 260.

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

Our report is made solely to the Company's members, as a body, in accordance with Section 391 of the Companies Act, 2014. Our audit work has been undertaken so that we might state to the Company's members those matters we are required to state to them in an auditors' report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Company and the Company's members, as a body, for our audit work, for this report, or for the opinions we have formed.

#### Rob Hamill

For and on behalf of Mazars  
Chartered Accountants & Statutory Audit Firm  
Harcourt Centre, Block 3  
Harcourt Road  
Dublin 2  
6 April 2023

## Profit and Loss Account: Technical Account - Non-Life Insurance Business

for the year ended 31 December 2022

	Note	2022 €000	2021 €000
<b>Gross premiums written</b>	4, 6	<b>239,136</b>	<b>215,800</b>
Outward reinsurance premiums		(196,919)	(176,746)
<b>Net premiums written</b>		<b>42,217</b>	<b>39,054</b>
Change in the gross provision for unearned premiums	22	(9,290)	(27,228)
Change in the provision for unearned premiums, reinsurers' share	22	8,462	22,361
<b>Net change in the provision for unearned premiums</b>		<b>(828)</b>	<b>(4,867)</b>
<b>Earned premiums, net of reinsurance</b>		<b>41,389</b>	<b>34,187</b>
Allocated investment return transferred from the non-technical account		1,009	470
Claims paid:			
Gross amount		(41,608)	(27,209)
Reinsurers' share		33,706	21,872
Net claims paid		(7,902)	(5,337)
Change in the provision for claims:			
Gross amount	22	(85,342)	(79,874)
Reinsurers' share	22	70,016	64,507
Change in the net provision for claims		(15,326)	(15,367)
<b>Claims incurred, net of reinsurance</b>		<b>(23,228)</b>	<b>(20,704)</b>
Net operating expenses	9	(8,745)	(9,549)
<b>Balance on the technical account - non-life insurance business</b>		<b>10,425</b>	<b>4,404</b>

The notes on pages 19 to 45 form part of these financial statements.

## Profit and Loss Account: Non-Technical Account

for the year ended 31 December 2022

	Note	2022 €000	2021 €000
<b>Balance on the technical account - non-life insurance business</b>		<b>10,425</b>	<b>4,404</b>
Investment income	8	1,909	1,171
Investment expenses and charges	10	(900)	(701)
Net investment return		1,009	470
Allocated investment return transferred to the non-life insurance business technical account		(1,009)	(470)
Net investment income not allocated to the non-life insurance business technical account		-	-
Other income	11	2,040	84
<b>Profit on ordinary activities before tax</b>	5, 12	<b>12,465</b>	<b>4,488</b>
Tax charge on profit on ordinary activities	14	(2,264)	(1,547)
<b>Profit for the financial year</b>		<b>10,201</b>	<b>2,941</b>

The profit for the financial year arising from discontinued operations is a profit of €0.0 million (2021 profit of €0.3 million). Further detail is provided in Note 5 to the accounts.

# Statement of Comprehensive Income /(Loss)

for the year ended 31 December 2022

	Note	2022 €000	2021 €000
<b>Profit for the financial year</b>		<b>10,201</b>	<b>2,941</b>
Unrealised losses on investments	15	(14,674)	(2,173)
Tax credit on unrealised losses on investments	14	2,242	369
Currency translation (losses)/gains on foreign currency net investments		(1,902)	100
Tax credit/(charge) on currency translation (losses)/gains	14	-	(12)
<b>Total comprehensive (loss)/income</b>		<b>(4,133)</b>	<b>1,225</b>

The notes on pages 19 to 45 form part of these financial statements.

## Statement of Changes in Equity

for the year ended 31 December 2022

	Share capital	Share premium	Capital Contribution	Profit and loss account	Fair value reserve	Total equity
	€000	€000	€000	€000	€000	€000
<b>At 1 January 2021</b>	<b>35,000</b>	<b>1,389</b>	<b>30,000</b>	<b>(563)</b>	<b>(786)</b>	<b>65,040</b>
Profit for the financial period	-	-	-	2,941	-	2,941
<i>Other gains/(losses) recognised in Other Comprehensive (Loss)/Income</i>						
Unrealised losses on investments, net of tax	-	-	-	-	(1,804)	(1,804)
Currency translation differences on foreign currency net investments, net of tax	-	-	-	88	-	88
Increase in share capital	30,000	-	-	-	-	30,000
<b>Balance at 31 December 2021</b>	<b>65,000</b>	<b>1,389</b>	<b>30,000</b>	<b>2,466</b>	<b>(2,590)</b>	<b>96,265</b>
Profit for the financial year	-	-	-	10,201	-	10,201
<i>Other losses recognised in Other Comprehensive Loss</i>						
Unrealised losses on investments, net of tax	-	-	-	-	(12,432)	(12,432)
Currency translation differences on foreign currency net investments, net of tax	-	-	-	(1,902)	-	(1,902)
Increase in share capital	35,000	-	-	-	-	35,000
<b>Balance at 31 December 2022</b>	<b>100,000</b>	<b>1,389</b>	<b>30,000</b>	<b>10,765</b>	<b>(15,022)</b>	<b>127,132</b>

The profit and loss account includes €0.7 million of net realised losses (2021 €0.5 million loss), net of tax, which have been transferred from the fair value reserve, of this a €0.5 million loss (2021 €0.3 million loss) relates to amounts brought forward from the prior year end.

# Balance Sheet

as at 31 December 2022

	Note	2022 €000	2021 €000
<b>ASSETS</b>			
<b>Investments</b>			
Financial investments	15	184,207	144,753
		184,207	144,753
<b>Reinsurers' share of technical provisions</b>			
Provision for unearned premiums	22	98,591	92,397
Claims outstanding	22	308,794	247,286
		407,385	339,683
<b>Debtors</b>			
Debtors arising out of insurance operations	16	74,609	66,364
Debtors arising out of reinsurance operations	17	611	240
Other debtors	18	83	-
		75,303	66,604
<b>Other assets</b>			
Deferred tax asset	20	2,527	344
Cash at bank		16,680	27,528
		19,207	27,872
<b>Prepayments and accrued income</b>			
Accrued income	19	4,639	1,647
Deferred acquisition costs	22	12,258	10,463
		16,897	12,110
<b>TOTAL ASSETS</b>		<b>702,999</b>	<b>591,022</b>

The notes on pages 19 to 45 form part of these financial statements.

# Balance Sheet *continued*

as at 31 December 2022

		<b>2022</b>	<b>2021</b>
	Note	€000	€000
<b>LIABILITIES</b>			
<b>Capital and reserves</b>			
Called up share capital presented as equity	21	100,000	65,000
Share premium account		1,389	1,389
Capital contribution		30,000	30,000
Profit and loss account		10,765	2,466
Fair value reserve		(15,022)	(2,590)
Shareholders' funds attributable to equity interests		127,132	96,265
<b>Technical provisions</b>			
Provision for unearned premiums	22	120,172	113,637
Claims outstanding	22	379,091	304,313
		499,263	417,950
<b>Creditors</b>			
Creditors arising out of insurance operations	24	2,383	3,594
Creditors arising out of reinsurance operations	25	42,013	47,760
Other creditors including taxation and social security	26	21,569	16,336
		65,965	67,690
<b>Accruals and deferred income</b>			
	27	10,639	9,117
<b>TOTAL LIABILITIES</b>		<b>702,999</b>	<b>591,022</b>

These financial statements were approved by the Board of Directors on 4 April 2023 and were signed on its behalf by:

**Mike Lawton**

Director

4 April 2023

**James Liston**

Director

4 April 2023

Travelers Insurance Designated Activity Company  
Registered in Ireland No. 620416

# Notes to the Financial Statements

## 1 Basis of preparation

Travelers Insurance Designated Activity Company (“the Company”) is a limited liability company incorporated in Ireland. Its registered office is at Third Floor, Block 8, Harcourt Centre, Charlotte Way, Dublin 2, Ireland. The financial statements of the Company have been prepared in compliance with the Companies Act 2014, Financial Reporting Standard 102 - “The Financial Reporting Standard applicable in the UK and Republic of Ireland” (“FRS 102”), Financial Reporting Standard 103 - “Insurance Contracts” (“FRS 103”) and the European Union (Insurance Undertakings: Financial Statements) Regulation 2015. There have been no material departures from these standards.

The financial statements have been prepared on the historical cost basis, except for available-for-sale financial assets that are measured at fair value.

The financial statements have been prepared in accordance with applicable accounting standards. The financial statements have been presented in Euro, the Company’s functional currency, rounded to the nearest thousand.

The Company’s ultimate parent undertaking, The Travelers Companies, Inc. (“TRV”), includes the Company in its consolidated financial statements. The consolidated financial statements of TRV are prepared in accordance with U.S. Generally Accepted Accounting Principles (“U.S. GAAP”), as promulgated by the Financial Accounting Standards Board (“FASB”), subject to the accounting-related rules and interpretations of the Securities and Exchange Commission (“SEC”). The TRV consolidated financial statements are available to the public by request and may be obtained from the Company’s registered address.

The Company is considered to be a qualifying entity and has applied the exemptions available under FRS 102 in respect of the following disclosures:

- Share based payments;
- Cash flow statement and related notes; and
- Key management personnel compensation.

The Directors have assessed the suitability of using the going concern assumption in preparing these accounts. In making this assessment they have looked forward for a period of twelve months from the date that these accounts are signed. Due to the nature of the business, and the investment and planning periods involved, there are no dates after this period that are material to the assessment of going concern. The Company does not have any external debt nor is it dependent on any banking facilities. The Directors have prepared these accounts on the going concern basis. In doing so the Directors considered the latest three year business plan and the likely trading environment. The Directors concluded that it remained appropriate to continue to prepare the Company’s financial statements using the Going Concern assumption.

The accounting policies set out below have, unless otherwise stated, been applied consistently to all periods presented in these financial statements.

## Notes to the Financial Statements *continued*

### 2 Significant accounting policies

The principal accounting policies applied in the preparation of these financial statements are set out below. The most critical individual components of these financial statements that involve the highest degree of judgement or most significant assumptions and estimations are set out in note 3 below.

#### ***Basis of accounting for underwriting activities***

All classes of business are accounted for on an annual basis.

#### ***Gross premiums written***

Under the annual basis of accounting, written premiums, gross of commission payable to intermediaries, comprise the direct and inward reinsurance premiums on contracts entered into during a financial year, regardless of whether such amounts may relate in part to a later financial year, exclusive of taxes and duties levied on premiums.

Premiums written include estimates for pipeline premiums (premiums written but not reported to the business by the balance sheet date) and adjustments to premiums written in prior accounting periods.

#### ***Unearned premiums***

Premiums written are recognised as earned according to the risk profile of the underlying policy. Unearned premiums represent the proportion of premiums written that relate to the unexpired terms of policies in force at the balance sheet date, calculated on time apportionment, or are earned on the basis of established earnings patterns. The reinsurers' share of unearned premiums is calculated with reference to the risk profile of the underlying reinsurance contract.

#### ***Acquisition costs***

Acquisition costs comprise the commission expenses of acquiring both the direct insurance and inward reinsurance policies written during the financial year. Acquisition costs are charged to the accounting periods in which the related premiums are earned. Deferred acquisition costs represent the proportion of acquisition costs incurred which corresponds to the proportion of gross premiums written which are unearned at the balance sheet date.

#### ***Classification of insurance contracts***

An insurance contract is one under which the Company has accepted significant insurance risk from the policyholder by agreeing to compensate the policyholder if a specified uncertain future event adversely affects the policyholder. These contracts remain in force until all rights and obligations are extinguished or expire.

#### ***Claims incurred***

Claims incurred include all claims and claim settlement expense payments made in respect of the financial year, and the movement in the provision for outstanding claims and settlement expenses, including the claims incurred but not reported provision, during the year.

#### ***Claims outstanding***

The provision for undiscounted outstanding claims represents the Company's estimate of the ultimate cost of settling claims that have occurred by the balance sheet date but not yet been finally settled, net of salvage and subrogation.

In addition to the inherent uncertainty of having to forecast the ultimate costs of those claims that have occurred but not yet been advised to the Company as at the balance sheet date, there is also the considerable uncertainty regarding the eventual final costs of the claims that have been reported by the balance sheet date but which remain unsettled. As a consequence of these uncertainties the Company has to apply sophisticated estimation techniques to determine the appropriate level of claims provisions.

In overview, claims provisions are determined based upon prior claims experience, knowledge of market conditions and trends, and the terms and conditions of the underlying policies of insurance.

## Notes to the Financial Statements *continued*

### 2 Significant accounting policies *continued*

#### **Claims outstanding** *continued*

A variety of different statistical techniques are used by the Company's in-house actuaries to determine the appropriate level of claims provision to carry. These methods include the following:

- Chain ladder development of paid and incurred claims, where claims to date for each accident year are extrapolated based upon historical development patterns of earlier years;
- Estimates based upon the projection of claims' numbers and average costs;
- Expected loss ratios; and
- Bornhuetter Ferguson method, which combines use of expected loss ratios, for the more recent and underdeveloped accident years, and the chain ladder projection of incurred claims data for earlier years.

All projections are carried out separately for each country, product, line of business and separately on a gross and ceded basis.

Large claims are identified and reserved for separately.

Where possible, the Company adopts multiple techniques to estimate the required level of claims provision. This assists in giving a greater understanding of the trends inherent in the data being projected and setting the range of possible outcomes. The most appropriate estimation technique is then selected taking into account the characteristics of the business class under consideration.

In arriving at the level of claims provisions, a margin is carried over and above the actuarial best estimate so that no adverse run off deviation is envisaged.

Establishing an appropriate level of claims provision is inherently uncertain. The degree of uncertainty will vary by product and line of business according to the characteristics of the insured risk. The level of uncertainty is also influenced by a number of factors such as claims cost inflation, judicial trends and legislative changes. As a consequence of this uncertainty the eventual cost of settling outstanding claims can vary substantially from the initial estimates.

#### **Reinsurance ceded**

Premiums payable in respect of reinsurance ceded are recognised in the period in which the underlying reinsurance contract incepts. Premiums are expensed over the period of the underlying reinsurance contract. A reinsurance asset is recognised to reflect the amount estimated to be recoverable under the reinsurance contracts in respect of the gross provision for losses reported under insurance contract liabilities. The amount recoverable is reduced where there is an event after the initial recognition that provides objective evidence that the Company may not receive all amounts due under the reinsurance contract. If there is such objective evidence the Company reduces the carrying amount of the reinsurance asset to its recoverable amount and recognises the impairment loss in the profit and loss account.

Income relating to profit commissions on reinsurance arrangements is recognised in the accounting period for which any related underwriting profit is calculated. Any such income is presented within net operating expenses in the profit and loss account.

#### **Unexpired risks**

A provision is made for unexpired risks where the claims and administrative expenses likely to arise after the end of the financial year in respect of contracts concluded before that date are expected to exceed the unearned premiums provision in relation to such policies after deduction of any acquisition costs deferred. Provision for unexpired risks is calculated after taking into account relevant investment income. Unexpired risk surpluses and deficits are aggregated where the business classes are managed together.

#### **Financial assets and liabilities**

In applying FRS 102, the Company has chosen to apply the recognition and measurement provisions of IAS 39 Financial Instruments: Recognition and Measurement (as adopted for use in the EU), the disclosure requirements of Sections 11 and 12 and the presentation requirements of paragraphs 11.38A and 12.25B.

## Notes to the Financial Statements *continued*

### 2 Significant accounting policies *continued*

#### *Financial assets and liabilities continued*

##### *Classification*

The accounting classification of financial assets and liabilities determines the way in which they are measured and changes in those values are presented in the profit and loss account or the statement of comprehensive income. Financial assets and liabilities are classified on their initial recognition. Subsequent reclassifications are permitted only in restricted circumstances.

Debt and other fixed-income securities are designated as available-for-sale and initially recognised at fair value plus any directly attributable transaction costs. After initial measurement these assets are subsequently measured at fair value.

Interest earned whilst holding available-for-sale financial assets is reported as interest income and presented in the profit and loss account. Fair value changes, including foreign exchange gains or losses on fair value changes, are recognised in the statement of comprehensive income and accumulated in the fair value reserve.

If an available-for-sale investment is sold or impaired, the cumulative gain or loss accumulated in the fair value reserve is reclassified to profit or loss. Impairment losses on available-for-sale financial assets are recognised by reclassifying the losses accumulated in the fair value reserve to profit or loss. The cumulative loss that is reclassified from the statement of comprehensive income to profit or loss is the difference between the acquisition cost, net of any principal repayment, and the current fair value, less any impairment loss recognised previously in profit or loss.

If, in a subsequent period, the fair value of an impaired available-for-sale debt security increases and the increase can be related objectively to an event occurring after the impairment loss was recognised, the impairment loss is reversed through profit or loss and otherwise it is reversed through the statement of comprehensive income.

Deposits with credit institutions, debtors and accrued interest are classified as receivables.

There are currently no restricted cash deposits with credit institutions.

##### *Recognition*

Financial assets and liabilities are recognised when the Company becomes a party to the contractual provisions of the asset or liability. Financial assets are derecognised if the Company's contractual rights to the cash flows from the financial assets expire or the Company transfers the financial asset to another party without retaining control of substantially all risks and rewards of the asset. A financial liability is derecognised when its contractual obligations are discharged, cancelled or expire.

##### *Identification and measurement of impairment*

The Company conducts a periodic review to identify invested assets with a present value of estimated future cash flows less than the carrying amount. Some of the factors considered in identifying such assets include:

- whether the Company intends to sell the investment or whether it is more likely than not that the Company will be required to sell the investment prior to an anticipated recovery in value;
- the likelihood of the recoveries in full of the principal and interest (i.e., whether there is a credit loss); and
- the financial condition, near-term and long-term prospects for the issuer, including the relevant industry conditions and trends, and implications of rating agency actions and offering prices.

All impairment losses are recognised in full in the profit and loss account.

##### *Offsetting*

Financial assets and liabilities are offset and the net amount presented in the balance sheet when, and only when, the Company has a legal right to set off the amounts and intends either to settle on a net basis or to realise the asset and settle the liability simultaneously.

## Notes to the Financial Statements *continued*

### 2 Significant accounting policies *continued*

#### **Financial assets and liabilities** *continued*

##### *Debtors and creditors arising out of direct and reinsurance operations*

Debtors and creditors arising out of direct and reinsurance operations are initially recognised at transaction price and are subsequently carried at the recoverable amount. The carrying value is reviewed for impairment whenever events or circumstances indicate that the carrying amount is greater than the recoverable amount, with the impairment adjustment recorded in the profit and loss account. Debtors arising out of direct insurance and reinsurance operations are stated net of specific provisions against doubtful debts which are made on the basis of reviews conducted by management.

##### *Other debtors and creditors*

Any other debtors and creditors are recognised initially at transaction price and subsequently carried at the recoverable amount. The carrying value of other debtors is reviewed for impairment whenever events or circumstances indicate that the carrying amount is greater than the recoverable amount, with the impairment adjustment recorded in the profit and loss account. All other debtors and creditors are due within one year, unless otherwise stated.

##### **Investment return**

Interest income is recognised on an accruals basis in the profit and loss account. Realised gains or losses represent the difference between net sales proceeds and purchase price.

Trading investment income, realised gains and losses and investment expenses and charges are allocated to the non-life insurance business technical account in full. Investment income earned during any non-trading period remains in the non-technical account.

Unrealised gains and losses on investments represent the difference between the fair value at the balance sheet date and their purchase price. Movements in unrealised investment gains and losses during the year comprise the increase/decrease in the reporting period in the value of the investments held at the reporting date and the reversal of unrealised investment gains and losses recognised in earlier reporting periods in respect of investment disposals of the current period. Movements in unrealised investment gains and losses are reported in the Statement of Comprehensive Income.

##### **Functional currencies**

The functional and reporting currency of the Company is Euro, with the exception of the branch operation in the UK, for which the functional currency is Sterling.

##### **Foreign currency translation**

Foreign currency transactions are translated into the functional currency using the exchange rates prevailing at the date of the transaction. Foreign exchange gains and losses resulting from settlement of such transactions and from the retranslation of monetary balance sheet items at the year end exchange rates are recognised in the non-technical account. All assets and liabilities relating to insurance contracts (including unearned premiums and deferred acquisition costs) are monetary items and are therefore retranslated at the year end exchange rates.

For the UK branch, that has a functional currency different to the Euro presentational currency, the results and financial position are translated into Euro as follows:

- balance sheet items are translated at the closing rate as at the balance sheet date;
- profit or loss account items are translated at average monthly exchange rates; and
- all resulting exchange differences are recognised in the statement of comprehensive income.

##### **Share based payments**

The Company's reward compensation scheme provides for the granting of stock options, restricted stock units and performance shares that are valued or determined by reference to the common stock of TRV. The Company expects to deliver shares to employees under these plans from the treasury stock of TRV. The Company also offers a Sharesave scheme for eligible employees through its affiliate, Travelers Management Limited ("TML"). Shares granted or awarded under each plan are accounted for by TML and costs recharged to the Company. Any such costs are presented within net operating expenses in the profit and loss account.

## Notes to the Financial Statements *continued*

### 2 **Significant accounting policies** *continued*

#### **Share based payments** *continued*

##### *Stock options*

Stock options awarded to eligible employees are exercisable and expire according to the vesting schedules as specified at the time of grant. Such options are awarded based on the fair market value of the common stock of TRV., a U.S. dollar denominated stock traded on the New York Stock Exchange, on the grant date, and have a term of ten years from the date of the grant. All employee stock option agreements provide that vesting is accelerated in certain circumstances, such as upon retirement or death.

##### *Restricted stock units and performance shares*

Restricted stock units and performance shares are awarded to eligible staff annually and have a three year vesting period.

##### *Sharesave scheme*

Under the Sharesave scheme the Board of TML grant options over shares in TRV to Irish and UK based employees. Options are granted with a fixed exercise price equal to 80% of the market price of the shares for the day prior to invitation, which is thirty days prior to the grant date. Employees who enter into the Sharesave scheme pay a fixed amount from salary into a savings account each month for five years. At the end of the savings period, these employees have six months in which to exercise their options using the funds saved, including interest earned. If these employees decide not to exercise their options they may withdraw the funds saved and the options expire. Exercise of options is subject to continued employment within the Company.

##### **Deferred tax**

Deferred tax is recognised in respect of all timing differences at the reporting date. Timing differences are differences between taxable profits and total comprehensive income as stated in the financial statements that arise from the inclusion of income and expenses in tax assessments in periods different from those in which they are recognised in financial statements. Deferred tax is determined using tax rates and laws that have been enacted or substantially enacted by the balance sheet date. Deferred tax assets are recognised to the extent that it is probable that they will be recovered against the reversal of deferred tax liabilities or that future taxable profits will be available against which the temporary differences can be utilised.

### 3 **Use of critical judgements, assumptions and estimates**

The preparation of the annual accounts requires the use of certain critical accounting estimates. It also requires the Directors to exercise their judgement in the process of applying the Company's accounting policies. The Directors consider the areas where estimates are significant to the Company's result and financial position are the valuation of insurance liabilities and the valuation of the deferred tax asset.

The most critical estimate included within the Company's balance sheet is that in respect of losses incurred but not reported

The estimation of claims IBNR is generally subject to a greater degree of uncertainty than the estimation of the cost of settling claims already notified to the Company, where more information about the claim event is generally available. In calculating the estimated cost of unpaid claims the Company uses a variety of estimation techniques, generally based upon statistical analyses of historical experience, which assumes that the development pattern of the current claims will be consistent with past experience. Allowance is made, however, for changes or uncertainties which may create distortions in the underlying statistics or which might cause the cost of unsettled claims to increase or reduce when compared with the cost of previously settled claims including:

- Changes in processes which might accelerate or slow down the development and/or recording of paid or incurred claims compared with the statistics from previous periods;
- Changes in the legal environment;
- The effects of inflation;
- Changes in the mix of business;
- The impact of large losses; and
- Movements in industry benchmarks.

## Notes to the Financial Statements *continued*

### 3 Use of critical judgements, assumptions and estimates *continued*

A component of these estimation techniques is the estimation of the cost of notified but not paid claims. In estimating the cost of these claims, regard is given to the claim circumstance as reported, any information available from loss adjusters and information on the cost of settling claims with similar characteristics in previous periods. Large claims affecting each relevant business class are generally assessed separately, either measured on a case by case basis or projected separately, in order to allow for the possible distorting effect of the development and incidence of these large claims. Where possible, multiple techniques are adopted in order to estimate the required level of provisions. This assists in giving greater understanding of the trends inherent in the data being projected. The projections given by the various methodologies also assist in setting the range of possible outcomes. The most appropriate estimation technique is selected taking into account the characteristics of the business class and the extent of the development of each accident year. The directors consider that the provisions for gross claims and related reinsurance recoveries are fairly stated on the basis of the information currently available to them. However, the ultimate liability will vary as a result of subsequent information and events and this may result in significant adjustments to the amounts provided. Adjustments to the amounts of claims provisions established in prior years are reflected in the financial statements in the period in which the adjustments are made. The methods used, and the estimates made, are reviewed regularly. Provisions are calculated gross of any reinsurance recoveries. A separate estimate is made of the amounts that will be recoverable from reinsurers based upon the gross provisions and having due regard to collectability. An estimate of the future cost of indirect claims handling is calculated as a percentage of the claims reserves held at the balance sheet date.

The gross IBNR held at 31 December 2022 was €276.4 million (2021: €210.1m). This is disclosed in note 22 to these accounts.

A sensitivity of the results and shareholders funds to a 5% increase or decrease in net loss ratio is disclosed on page 27 of these accounts.

### 4 Risk and capital management

This section identifies the key risks faced by the Company and the steps taken to manage those risks. The Company's appetite for accepting and managing the varying classes of risk it faces is defined by the Company's Board of Directors. The Board of Directors has established a comprehensive risk management framework that includes a full range of risk policies and risk procedures which include risk identification, risk measurement, risk mitigation, risk reporting and stress and scenario tests to ensure that the risk exposures faced by the Company are appropriately managed.

The principal sources of risk faced by the Company can be classified in the following categories:

- Insurance;
- Inflation;
- Credit;
- Market;
- Liquidity; and
- Capital management.

#### **Insurance risk**

##### *Management of insurance risk*

The European Underwriting Committee oversees the management of underwriting risk and in particular ensures adherence to the Board determined risk appetite in terms of product, line of business, geographical exposure, line sizes, and rating adequacy. The underwriting strategy includes limits on the Company's total exposure to specific risks, together with limits on geographical and industry exposures. The aim is to ensure a well diversified book is maintained with no over exposure in any one industry, line of business or geographical region. The European Underwriting Committee meets quarterly and will address new product ideas, emerging claims issues, product and line of business profitability issues, as well as monitoring the overall portfolio performance.

Contracts can contain a number of features which help to manage the underwriting risk such as the use of deductibles, limits and aggregate caps. The Company uses sophisticated modelling tools to monitor and manage the concentration of exposure from weather events and to ensure they remain within the Board's risk appetite. Authority limits are accorded to individual underwriters based on their experience. The Company also makes use of reinsurance to mitigate the risk of incurring significant

## Notes to the Financial Statements *continued*

### 4 Risk and capital management *continued*

#### *Insurance risk continued*

losses linked to any one risk or any one event, principally risk excess of loss and property catastrophe reinsurance. Where an individual exposure is in excess of the Company's appetite additional facultative reinsurance may also be considered through participation in the European Travelers reinsurance programme. In addition, the Company has a reinsurance arrangement with its immediate parent undertaking in the form of an 80% Quota Share.

On a monthly basis performance reviews are conducted to monitor premium production, business mix, rating adequacy and claims activity relative to targets set out in the Company's annual business plan. On an annual basis each portfolio is subjected to a detailed review to identify actions to be taken to improve performance where necessary and opportunities to further develop the portfolio.

The Finance Committee oversees the management of reserving risk. The Company's in house actuaries perform a reserving analysis on a quarterly basis, liaising closely with underwriters and claims handlers. The use of proprietary and standardised modelling techniques, internal and external benchmarking, and the review of claims development patterns are all instrumental in mitigating reserving risk. The aim of the quarterly reserving analysis is to produce a probability-weighted average of the expected future cash outflows arising from the settlement of incurred claims. These projections include an analysis of claims development compared to the previous 'best estimate' projections.

The Finance Committee performs a comprehensive review of the projections, both gross and net of reinsurance, and following this review makes recommendations to the Company's Board of Directors of the appropriate claims provisions to be established. In arriving at the level of claims provisions carried, a margin is applied over and above the actuarial best estimate so no adverse run-off deviation is envisaged.

#### *Concentration of insurance risk*

The following table provides an analysis of the geographical breakdown of the Company's premiums written by class of business based on the location of the underlying risk:

	<b>2022</b>			
	Ireland	UK	Other	Total
	€000	€000	€000	€000
Credit and Suretyship	2,532	-	814	3,346
Fire and other damage to property	20,300	25,476	6,143	51,919
Marine	1,131	582	1,034	2,747
Miscellaneous	15	-	148	163
Motor	8,511	792	124	9,427
Third party liability	43,875	83,269	44,390	171,534
<b>Total</b>	<b>76,364</b>	<b>110,119</b>	<b>52,653</b>	<b>239,136</b>

	<b>2021 restated</b>			
	Ireland	UK	Other	Total
	€000	€000	€000	€000
Credit and Suretyship	917	-	479	1,396
Fire and other damage to property	23,597	22,244	3,086	48,927
Marine	338	49	1,570	1,957
Miscellaneous	159	-	-	159
Motor	9,085	514	19	9,618
Third party liability	19,932	83,790	50,021	153,743
<b>Total</b>	<b>54,028</b>	<b>106,597</b>	<b>55,175</b>	<b>215,800</b>

## Notes to the Financial Statements *continued*

### 4 Risk and capital management *continued*

#### *Insurance risk continued*

GWP relating to 2021 has been reallocated in the above table between the UK, Ireland and Other to correctly reflect their location of risk following the identification of mis-allocation in the prior year Financial Statements. The amounts previously reported were €59.4 million, €140.5 million and €15.9 million respectively.

#### *Loss ratio sensitivity*

The following table shows the impact on the Company's post tax result and financial position were the loss ratio (claims incurred over earned premium) to increase by 5%. This is on the basis that an increase in gross claims incurred would have a similar impact on the reinsurance recovery and the claims handling costs:

	<b>2022</b>	2021
Gross	€000	€000
Total decrease in result after tax and net assets	10,056	8,250
Net		
Total decrease in result after tax and net assets	1,811	1,496

#### *Profit and loss sensitivity to expenses*

The following table shows the impact were net operating expenses to increase by 5%:

	<b>2022</b>	2021
Gross	€000	€000
Total decrease in result after tax and net assets	2,705	2,286
Net		
Total decrease in result after tax and net assets	383	418

#### *Inflation risk*

An analysis of the Company's sensitivity to inflation risk is presented in the table below. The table below shows the potential impact on the Company's loss reserves for an indefinite increase/(decrease) in inflation (e.g. the 100 basis point shows the impact if inflation remains 100 basis point higher than expected from now until all liabilities are run-off). Inflation is calculated as the inflation in the cost of settling claims.

	Gross	Net
	€000	€000
Impact of 100 basis point increase on loss reserves	5,311	986
Impact of 100 basis point decrease on loss reserves	(5,237)	(972)
Impact of 200 basis point increase on loss reserves	10,697	1,986
Impact of 200 basis point decrease on loss reserves	(10,401)	(1,930)

100 and 200 basis points increase/(decrease) in inflation have been selected on the basis that these are considered to be reasonable changes in these risk variables over the following year.

The sensitivity analysis demonstrates the effect of a change in a key variable while other assumptions remain unchanged, however, the occurrence of a change in a single market factor may lead to changes in other market factors as a result of correlations.

## Notes to the Financial Statements *continued*

### 4 Risk and capital management *continued*

#### Credit risk

Credit risk is the risk of financial loss due to counterparties failing to meet some or all of their obligations.

The Company's key areas of exposure to credit risk include:

- counterparty exposures with respect to cash deposits and investments;
- reinsurers' share of technical provisions; and
- amounts due from brokers and policyholders.

The Finance Committee oversees the management of credit risk. The Committee is responsible for ensuring that the Board approved credit risk appetite is not exceeded. Limits are placed on exposures to individual bank and investment counterparties, and groups of counterparties, based on the likelihood of default having regard to the credit rating of the underlying counterparty.

The Company's strategy is to participate in the European Travelers reinsurance programme, which purchases reinsurance only from reinsurers who meet specified security standards. Reinsurance counterparties are subject to a rigorous internal assessment process by reviewing credit ratings provided by rating agencies and other publicly available financial information. Due to the nature of the reinsurance market, and the restricted range of reinsurers with acceptable credit ratings, the Company is exposed to credit and concentration risk with individual reinsurers and groups of reinsurers.

In addition, the Company has an 80% Quota Share arrangement in place with TICL, its immediate parent. The net premiums paid by the Company to TICL are held within an escrow account. The assets held within the escrow account cannot be released to TICL until the assets within the account exceed the associated liabilities and not before 31 December 2022, and from thereafter on a bi-annual basis. Claims payable relating to the Quota Share can be funded from the escrow account.

The Company's exposure to brokers and policyholders is monitored as part of its regular credit control processes. The payment histories of brokers and policyholders are monitored on a monthly basis.

An analysis of the Company's exposure to counterparty credit risk based on Standard and Poor's or equivalent ratings, is set out below:

	2022				
	AAA	AA	A	Not rated	Total
	€000	€000	€000	€000	€000
Investments	65,352	53,838	65,017	-	184,207
Reinsurance claims outstanding	-	299,217	9,425	152	308,794
Reinsurance debtors	-	137	469	5	611
Insurance debtors	-	-	-	74,609	74,609
Other debtors	-	-	-	83	83
Cash at bank	-	3,441	13,239	-	16,680
Total by rating	65,352	356,633	88,150	74,849	584,984
Percentage by rating	11.2%	60.9%	15.1%	12.8%	100.0%

	2021				
	AAA	AA	A	Not rated	Total
	€000	€000	€000	€000	€000
Investments	51,020	38,935	54,798	-	144,753
Reinsurance claims outstanding	-	242,527	4,577	182	247,286
Reinsurance debtors	-	123	36	81	240
Insurance debtors	-	-	-	66,364	66,364
Other debtors	-	-	-	-	-
Cash at bank	-	1	27,527	-	27,528
Total by rating	51,020	281,586	86,938	66,627	486,171
Percentage by rating	10.5%	57.9%	17.9%	13.7%	100.0%

## Notes to the Financial Statements *continued*

### 4 Risk and capital management *continued*

#### **Credit risk** *continued*

The largest counterparty exposure within the AAA rating was the European Investment Bank as at 31 December 2022 and 2021. Within the AA rating, the largest counterparty exposure was Svenska Handelsbanken as at 31 December 2022 (2021 Colgate- Palmolive). With the exception of AAA and AA government debt securities the largest credit exposure does not exceed 5% of the Company's total financial assets.

The largest reinsurance counterparty exposure within the AA rating at both 31 December 2022 and 2021 is TICL.

As at 31 December 2022 and 2021 the Company held no material financial assets that were past due or impaired beyond their reported fair values. For the current and prior periods the Company did not experience any defaults on investments.

An analysis of the carrying amounts of past due or impaired financial assets is presented in the table below:

	2022					Total €000
	Within terms	0 - 1 month	2 - 3 months	Over 3 Months	Impairments	
	€000	€000	€000	€000	€000	
Investments	184,207	-	-	-	-	184,207
Reinsurance claims outstanding	308,794	-	-	-	-	308,794
Reinsurance debtors	471	-	39	101	-	611
Insurance debtors	65,329	1,857	2,637	4,786	-	74,609
Other debtors	83	-	-	-	-	83
Cash at bank	16,680	-	-	-	-	16,680
<b>Total</b>	<b>575,564</b>	<b>1,857</b>	<b>2,676</b>	<b>4,887</b>	<b>-</b>	<b>584,984</b>
	2021					
	Within terms	0 - 1 month	2 - 3 months	Over 3 Months	Impairments	Total
	€000	€000	€000	€000	€000	€000
Investments	144,753	-	-	-	-	144,753
Reinsurance claims outstanding	247,286	-	-	-	-	247,286
Reinsurance debtors	41	1	117	81	-	240
Insurance debtors	59,773	1,584	2,245	2,781	(19)	66,364
Other debtors	-	-	-	-	-	-
Cash at bank	27,528	-	-	-	-	27,528
<b>Total</b>	<b>479,381</b>	<b>1,585</b>	<b>2,362</b>	<b>2,862</b>	<b>(19)</b>	<b>486,171</b>

The Company's maximum exposure to credit risk is represented by the carrying values of financial assets included in the balance sheet. The Company does not use credit derivatives or other products to mitigate the maximum exposure to credit risk.

## Notes to the Financial Statements *continued*

### 4 Risk and capital management *continued*

#### Market risk

The Finance Committee oversees the management of market risk. The Company is exposed to the risk of potential losses from adverse movements in market prices, in particular those of interest rates and foreign currency exchange rates. These exposures are controlled by the setting of limits and by asset-liability matching, in terms of both duration and foreign currency composition, in line with the Company's risk appetite.

#### Interest rate risk

The Company's investment portfolio is comprised exclusively of high quality fixed income government and corporate bonds. The fair value of the investment portfolio is inversely correlated to movement in market interest rates. If market interest rates rise, the fair value of the Company's fixed income investments will fall. The investments typically have relatively short durations and the portfolio is managed to minimise interest rate risk.

	<b>2022</b>	2021
	€000	€000
Impact of 50 basis point increase on result and net assets	(2,428)	(2,269)
Impact of 50 basis point decrease on result and net assets	2,489	2,325
Impact of 200 basis point increase on result and net assets	(9,369)	(8,736)
Impact of 200 basis point decrease on result and net assets	10,331	9,710

Insurance contract liabilities are not directly sensitive to interest rates as they are undiscounted and non-interest bearing.

#### Currency risk

The Company operates principally in Ireland and the UK. It has currency exposures to its operations in the UK and to intercompany transactions with other group companies in the United States. Accordingly its net assets are subject to foreign exchange movements between the Euro, Sterling and US Dollar. The Company manages these exposures by monitoring them regularly and endeavouring to ensure its Euro and Sterling liabilities are broadly matched by Euro and Sterling assets respectively, with any surplus net assets held in Euro.

The Company's shareholder's equity analysed by currency is:

	Euro	Sterling	US dollar	Other	Total
	€000	€000	€000	€000	€000
Net assets 31 December 2022	120,181	4,828	2,123	-	127,132
Net assets 31 December 2021	90,755	2,835	2,677	(2)	96,265

The impact of a 10% change in Euro against Sterling and US Dollar at the reporting date would have the following impact on shareholder's equity:

	Increase Euro/Sterling	Decrease Euro/Sterling	Increase Euro/ US Dollar	Decrease Euro/ US Dollar
	€000	€000	€000	€000
Increase/(decrease) in net assets 31 December 2022	(422)	422	(186)	186
Increase/(decrease) in net assets 31 December 2021	(248)	248	(234)	234

## Notes to the Financial Statements *continued*

### 4 Risk and capital management *continued*

#### **Liquidity risk**

Liquidity risk is the risk that the Company may be unable to settle its obligations as they fall due as a result of insufficient assets being available in a form that can be readily convertible into cash.

The Finance Committee oversees the management of liquidity risk. The Company's financial assets are held in highly liquid assets that can be readily convertible into cash in a prompt fashion and with minimal expense. The Company has no external debt. Cash flow forecasts are prepared and reviewed on a regular basis.

The following table summarises the maturity profile of the Company's insurance liabilities and creditors analysed based on the estimated remaining duration until settlement:

2022	Total	0 - 1 year	2 - 5 years	More than 5 years
	€000	€000	€000	€000
Technical provisions	499,263	212,702	236,391	50,170
Creditors	65,965	65,965	-	-
<b>Total</b>	<b>565,228</b>	<b>278,667</b>	<b>236,391</b>	<b>50,170</b>
2021	Total	0 - 1 year	2 - 5 years	More than 5 years
	€000	€000	€000	€000
Technical provisions	417,950	112,490	262,991	42,469
Creditors	67,690	67,690	-	-
<b>Total</b>	<b>485,640</b>	<b>180,180</b>	<b>262,991</b>	<b>42,469</b>

#### **Capital management**

The Company's primary objectives when managing its capital position are as follows:

- to protect its ability to continue as a going concern and thus to protect its policyholders;
- to enable an appropriate return to TRV's shareholders by allocating appropriate amounts of capital to its products commensurate with the risks taken; and
- to comply with its regulatory capital requirements.

The Company's capital comprises share capital, capital contribution, retained earnings and fair value reserves. For internal modelling purposes the Company treats its available capital as being its Own Funds on a Solvency II basis. As at 31 December 2022 available capital on this basis comprised €129.3 million (2021 €92.1 million).

The Company is subject to capital requirements imposed by both its regulator and rating agencies. The insurance company capital regime in Ireland is on a Solvency II basis. Under this regime the Company's capital requirement is determined using the standard formula. As management sets the target economic capital for the Company, the regulatory and rating agency capital requirements are treated as minimum requirements. In setting its target economic capital and determining capital to allocate to different products the Company employs its internal capital model. At 31 December 2022 the Company's regulatory solvency capital requirement was €63.7 million (2021 €59.2 million) and its coverage ratio was 202.9% (2021 155.4%).

During the year the Company was in full compliance with the capital requirements imposed by its regulator, the Central Bank of Ireland.

The Company's financial strength rating with A.M. Best is A++ (superior) and S&P AA-.

Notes to the Financial Statements *continued***5 Continuing and run-off operations**

The breakdown of the general business technical and non-technical account between run-off and continuing operations is as follows:

	2022		2021	
	Continuing operations	Run-off operations	Continuing operations	Run-off operations
	€000	€000	€000	€000
Net premiums written	42,217	-	39,054	-
Net premiums earned	41,388	1	34,187	-
Allocated investment return	933	76	354	116
	42,321	77	34,541	116
Claims paid - gross amount	(38,808)	(2,800)	(26,143)	(1,066)
Claims paid - reinsurers' amount	31,466	2,240	21,019	853
Change in provisions for claims - gross amount	(86,276)	934	(80,739)	865
Change in provisions for claims - reinsurers' amount	70,405	(389)	64,939	(432)
Claims incurred, net of reinsurance	(23,213)	(15)	(20,924)	220
Net operating expenses	(8,675)	(70)	(9,499)	(50)
Balance on the technical account	10,433	(8)	4,118	286
Investment income	1,833	76	1,055	116
Investment expenses and charges	(900)	-	(701)	-
	933	76	354	116
Allocated investment return transferred to the non-life technical account	(933)	(76)	(354)	(116)
Other income	2,021	19	78	6
Profit on ordinary activities before tax	12,454	11	4,196	292

Run-off business in the former TICL branch operations in Ireland, Netherlands, France and Germany was transferred to TIDAC via a business transfer scheme under Part VII of the United Kingdom Financial Services and Markets Act 2000 as of 1 October 2019. 80% has been reinsured back to TICL under a quota share reinsurance agreement.

## Notes to the Financial Statements *continued*

### 6 Analysis of underwriting result

#### (a) Analysis of gross premiums, loss before taxation and net assets

<b>2022</b>	Gross premiums written	Gross premiums earned	Profit/(Loss) before
<b>By geographical segment</b>	€000	€000	€000
Republic of Ireland	89,304	86,798	1,728
UK	149,832	143,048	10,774
Other Europe	-	-	(37)
<b>Total</b>	<b>239,136</b>	<b>229,846</b>	<b>12,465</b>

<b>2021 restated</b>	Gross premiums written	Gross premiums earned	Profit/(Loss) before
<b>By geographical segment</b>	€000	€000	€000
Republic of Ireland	80,695	57,948	(720)
UK	135,105	130,624	5,340
Other Europe	-	-	(132)
<b>Total</b>	<b>215,800</b>	<b>188,572</b>	<b>4,488</b>

GWP relating to 2021 has been reallocated in the above table between the UK and Ireland to correctly reflect their location of risk following the identification of mis-allocation in the prior year Financial Statements. The below table shows the values originally reported..

<b>2021 original</b>	Gross premiums written	Gross premiums earned	Profit/(Loss) before
<b>By geographical segment</b>	€000	€000	€000
Republic of Ireland	69,813	63,723	(1,178)
UK	145,987	124,849	5,798
Other Europe	-	-	(132)
<b>Total</b>	<b>215,800</b>	<b>188,572</b>	<b>4,488</b>

The Directors consider that the Company is involved in only one type of business, that being non-life insurance.

#### (b) Analysis of gross premiums written

	<b>2022</b>	2021
Resulting from contracts concluded by the Company:	€000	€000
Direct	234,379	211,831
Inwards reinsurance	4,757	3,969
	<b>239,136</b>	<b>215,800</b>

Notes to the Financial Statements *continued***6 Analysis of underwriting result** *continued***(c) Analysis of gross premiums written, gross premiums earned, gross claims incurred, gross operating expenses and the reinsurance balance**

	<b>2022</b>				
	Gross premiums written	Gross premiums earned	Gross claims incurred	Gross operating expenses	Reinsurance balance
	€000	€000	€000	€000	€000
Credit and Suretyship	3,346	1,719	(261)	(439)	(717)
Fire and other damage to property	51,919	48,888	(12,366)	(16,488)	(16,292)
Marine	2,747	2,545	(1,448)	(990)	(156)
Miscellaneous	163	189	(168)	(74)	43
Motor	9,427	9,640	(4,661)	(3,694)	(1,097)
Third party liability	171,534	166,865	(108,046)	(40,139)	(13,437)
	239,136	229,846	(126,950)	(61,824)	(31,656)
			<b>2021</b>		
	Gross premiums written	Gross premiums earned	Gross claims incurred	Gross operating expenses	Reinsurance balance
	€000	€000	€000	€000	€000
Credit and Suretyship	1,396	1,246	(217)	(274)	(630)
Fire and other damage to property	48,927	40,709	(9,202)	(14,207)	(15,303)
Marine	1,957	1,733	(723)	(1,028)	(39)
Miscellaneous	159	47	(12)	(23)	(9)
Motor	9,618	9,540	(10,078)	(3,791)	3,456
Third party liability	153,743	135,297	(86,851)	(32,938)	(12,769)
	215,800	188,572	(107,083)	(52,261)	(25,294)

Gross commission payable in respect of direct insurance amounted to €31.1 million (2021 €25.7 million).

The reinsurance balance represents the aggregate total of all those items included in the technical account which relate to reinsurance outwards transactions, including reinsurance commissions.

**7 Net prior years' claims provisions**

Over/(under) provisions for claims held at the beginning of the financial year compared to payments made during and provisions held at the end of the financial year in respect of prior years' claims are as follows:

	<b>2022</b>	2021
	€000	€000
Fire and other damage to property	1,081	738
Motor	248	(74)
Third party liability	(168)	107
	1,161	771

Notes to the Financial Statements *continued***8 Investment income**

	<b>2022</b>	2021
	€000	€000
Income from investments	1,909	1,164
Gains on the realisation of investments	-	7
	1,909	1,171

**9 Net operating expenses**

	<b>2022</b>	2021
	€000	€000
Acquisition costs	31,052	25,652
Change in gross deferred acquisition costs	(1,984)	(2,524)
	29,068	23,128
Administrative expenses	32,756	29,133
Gross operating expenses	61,824	52,261
Reinsurance commissions and profit participation	(54,882)	(44,821)
Change in deferred reinsurance commission	1,803	2,109
	8,745	9,549

**10 Investment expenses and charges**

	<b>2022</b>	2021
	€000	€000
Investment management expenses	120	105
Losses on the realisation of investments	780	596
	900	701

**11 Other income/(expense)**

	<b>2022</b>	2021
	€000	€000
Foreign exchange gains/(losses)	1,702	(75)
Other income	338	159
	2,040	84

Notes to the Financial Statements *continued***12 Profit on ordinary activities before tax**

	<b>2022</b>	2021
	€000	€000
<b><i>Profit on ordinary activities before tax is stated after crediting</i></b>		
Income from fixed income investments	1,909	1,164
<b><i>after charging</i></b>		
Auditor's remuneration:		
Audit of these financial statements	135	120
Non-audit services	5	5
Audit-related assurance services	51	45

**13 Employees and directors****(a) The staff costs during the period were:**

	<b>2022</b>	2021
	€000	€000
Wages and Salaries	1,362	1,340
Share based payments	192	149
Social security costs	302	279
Other pension costs	99	94
	1,955	1,862

The average number of employees, including executive directors, employed during 2022 was 6 (2021 6). Any such costs are presented within net operating expenses in the profit and loss account.

	<b>2022</b>	2021
	€000	€000
Claims and underwriting	688	684
Financial and actuarial	430	414
Executive and other	837	764
	1,955	1,862

The Company has a management agreement with a fellow group company, Travelers Management Limited, which employs the remaining Company personnel. The Company pays a service charge in respect of services provided by staff employed by Travelers Management Limited.

**(b) The directors remuneration during the period was:**

	<b>2022</b>	2021
	€000	€000
Directors' emoluments	690	591
Company contributions to share saver schemes	18	17

The remuneration of group non-executive directors are paid by their respective employer within the group.

## Notes to the Financial Statements *continued*

### 14 Taxation

#### Analysis of total tax charge for the year

<b>(a) Tax included in the non-technical account</b>	<b>2022</b>	2021
	€000	€000
<b>Ireland Corporation Tax</b>		
Ireland Corporation Tax at 12.5% (2021 12.5%)	528	541
Adjustments in respect of prior periods	-	(87)
Total current tax charge	528	454
<b>Foreign tax</b>		
UK Corporation tax at 19% (2021 19%)	1,310	607
Adjustments in respect of prior years	426	-
	1,736	607
<b>Deferred tax</b>		
Deferred tax charge	-	486
Tax charge on profit on ordinary activities	2,264	1,547
<b>(b) Tax included in Other Comprehensive Loss</b>		
	<b>2022</b>	2021
	€000	€000
Deferred tax:		
Credit on unrealised losses on investments	(2,242)	(369)
Charge on currency translation	-	12
Tax credit on Other Comprehensive Loss	(2,242)	(357)

#### (c) Factors affecting the total tax charge for the year

The tax charge for the year is higher than the standard rate of corporation tax in the Ireland (2021 higher than the standard rate):

	<b>2022</b>	2021
	€000	€000
Profit on ordinary activities before tax	12,465	4,488
Tax using the corporation tax rate of 12.5% (2021 12.5%)	1,558	561
Foreign tax	1,736	1,062
Double taxation relief	(910)	-
Difference in UK/Ireland tax treatment	36	-
Unrecognised deferred tax	(156)	(76)
Total tax charge	2,264	1,547

As at 31 December 2022 the Company had unrecognised tax losses carried forward of €110.2 million (2021 €111.4 million). Further information can be seen in note 20.

In the UK's 2021 Budget, the UK Government announced the UK corporation tax will increase to 25% on 1 April 2023. Royal assent was received on 10 June 2021. This will increase the Company's future tax liability accordingly.

Notes to the Financial Statements *continued***15 Investments****(a) Fair value**

	Fair Value <b>2022</b>	Fair Value 2021	Cost <b>2022</b>	Cost 2021
	€000	€000	€000	€000
Debt and other fixed income securities	184,207	144,753	201,818	147,690
Included in debt and other fixed income securities:				
Irish fixed income securities	14,751	2,123	15,249	2,171
Overseas fixed income securities	169,456	142,630	186,569	145,519
	184,207	144,753	201,818	147,690

**(b) Movement in the year**

	<b>2022</b>	2021
	€000	€000
Investments brought forward	144,753	87,492
Purchases	72,896	75,227
Fair value adjustments	(14,674)	(2,173)
Disposals/maturities	(16,422)	(16,241)
Currency translation movements	(2,346)	448
Investments carried forward	184,207	144,753

## Notes to the Financial Statements *continued*

### 15 Investments *continued*

#### (c) Fair value measurement of investments

The Company's estimates of fair value for investments are based on the framework established in the fair value accounting guidance. The framework is based on the inputs used in valuation, gives the highest priority to quoted prices in active markets and requires that observable inputs be used in the valuations when available. The disclosure of fair value estimates in the fair value accounting guidance hierarchy is based on whether the significant inputs into the valuation are observable. In determining the level of the hierarchy in which the estimate is disclosed, the highest priority is given to unadjusted quoted prices in active markets and the lowest priority to unobservable inputs that reflect the Company's significant market assumptions. The level in the fair value hierarchy within which the fair value measurement is reported is based on the lowest level input that is significant to the measurement of its entirety. The three levels of the hierarchy are as follows:

- Level 1 - The unadjusted quoted price in an active market for identical assets or liabilities that the entity can access at the measurement date;
- Level 2 - Inputs other than quoted prices included within Level 1 that are observable (i.e. developed using market data) for the asset or liability, either directly or indirectly; and
- Level 3 - Inputs are unobservable (i.e. for which market data is unavailable) for the asset or liability and therefore, prices are determined using a valuation technique.

The Company utilised a pricing service to estimate the fair value of its investments at both 31 December 2022 and 31 December 2021.

The fair value of a financial instrument is the estimated amount at which the instrument could be exchanged in an orderly transaction between knowledgeable, unrelated, willing parties, i.e., not in a forced transaction. The estimated fair value of a financial instrument may differ from the amount that could be realised if the security was sold in an immediate sale, e.g. a forced transaction. Additionally, the valuation of investments is more subjective when markets are less liquid due to the lack of market based inputs, which may increase the potential that the estimated fair value of an investment is not reflective of the price at which an actual transaction would occur.

For investments that have quoted market prices in active markets, the Company uses the unadjusted quoted market prices as fair value and includes these prices in the amounts disclosed in Level 1 of the hierarchy. The Company receives the quoted market prices from third party, nationally recognised pricing services. When quoted market prices are unavailable, the Company utilises these pricing services to determine an estimate of fair value based on recent transactions for identical assets. The fair value estimates provided from these pricing services are included in the amount disclosed in Level 2 of the hierarchy. If quoted market prices and an estimate from a pricing service are unavailable, the Company produces an estimate of fair value based on internally developed valuation techniques, which, depending on the level of observable market inputs, will render the fair value estimate as Level 2 or Level 3. The Company bases all of its estimates of fair value for assets on the bid price as it represents what a third party market participant would be willing to pay in an arm's length transaction.

The following table present the level within the fair value hierarchy at which the Company's investments are categorised.

	Level 1	Level 2	Level 3	Total
	€000	€000	€000	€000
Financial assets as at 31 December 2022	-	184,207	-	184,207
Financial assets as at 31 December 2021	-	144,753	-	144,753

Notes to the Financial Statements *continued***16 Debtors arising out of insurance operations**

	<b>2022</b>	2021
	€000	€000
Amounts owed by intermediaries	74,534	66,203
Amounts owed by policyholders	75	161
	<b>74,609</b>	<b>66,364</b>

There is no significant concentration of credit risk with respect to debtors arising out of insurance operations. The carrying amounts disclosed are reasonable approximations of the fair values at the reporting date. All debtors are due within one year.

**17 Debtors arising out of reinsurance operations**

	<b>2022</b>	2021
	€000	€000
Amounts owed by reinsurers	611	240

All debtors are due within one year.

**18 Other debtors**

	<b>2022</b>	2021
	€000	€000
Amounts owed by group undertakings	83	-
	<b>83</b>	<b>-</b>

All debtors are due within one year.

**19 Accrued income**

	<b>2022</b>	2021
	€000	€000
Other accrued income	3,472	761
Accrued interest	1,167	886
	<b>4,639</b>	<b>1,647</b>

## Notes to the Financial Statements *continued*

### 20 Deferred tax asset

The amounts provided for deferred taxation are set out below:

	2022			
	Tax losses	Unrealised gains/ (losses) on investments	Currency translation	Total net deferred tax asset
	€000	€000	€000	€000
Deferred tax asset brought forward	-	344	-	344
Current year profit and loss	(156)	-	-	(156)
Unrecognised deferred tax	156	-	-	156
Currency exchange movements	-	(55)	-	(55)
Rate change	-	(4)	-	(4)
Other Comprehensive Income	-	2,242	-	2,242
	-	2,527	-	2,527

	2021			
	Tax losses	Unrealised gains/ (losses) on investments	Currency translation	Total net deferred tax asset
	€000	€000	€000	€000
Deferred tax asset/(liability) brought forward	486	(25)	12	473
Current year P&L	(487)	-	-	(487)
Prior year P&L adjustments	(75)	-	-	(75)
Unrecognised deferred tax	76	-	-	76
Other Comprehensive Income	-	369	(12)	357
	-	344	-	344

The tax losses carried forward have no time limit. €110.2 million of losses carried forward were unprovided for in the year (2021€111.4 million). The net reversal of deferred tax expected to occur next year is €nil thousand, relating to the release of tax losses carried forward of €nil thousand.

### 21 Called up share capital

	2022	2021
	€000	€000
<b>Authorised</b>		
100,000,000 (2021 100,000,000) ordinary shares of €1 each	100,000	100,000
<b>Allotted, called up and fully paid</b>		
100,000,000 (2021 65,000,001) ordinary shares of €1 each	100,000	65,000

During the year the Company received a capital injection of €35 million in return for the issuance of 35 million new ordinary €1 shares.

On 14 March 2023, an increase of €1 authorised ordinary shares from 100 million to 200 million was approved by the board.

Notes to the Financial Statements *continued***22 Technical provisions and deferred acquisition costs****(a) Unearned premium provision**

	2022			2021		
	Gross €000	Reinsurance €000	Net €000	Gross €000	Reinsurance €000	Net €000
Balance as at 1 January	113,637	92,397	21,240	82,460	66,819	15,641
Change in unearned premiums	9,290	8,462	828	27,228	22,361	4,867
Effect of movements in exchange rates	(2,755)	(2,268)	(487)	3,949	3,217	732
Balance as at 31 December	120,172	98,591	21,581	113,637	92,397	21,240

**(b) Claims outstanding**

Balance as at 1 January	304,313	247,286	57,027	218,761	178,204	40,557
Change in claims outstanding	85,342	70,016	15,326	79,874	64,507	15,367
Effect of movements in exchange rates	(10,564)	(8,508)	(2,056)	5,678	4,575	1,103
Balance as at 31 December	379,091	308,794	70,297	304,313	247,286	57,027
Claims notified	92,243	76,579	15,664	86,512	71,867	14,645
Claims incurred but not reported	276,403	223,859	52,544	210,060	169,227	40,833
Unallocated loss adjustment expenses	10,445	8,356	2,089	7,741	6,192	1,549
Balance as at 31 December	379,091	308,794	70,297	304,313	247,286	57,027

**(c) Deferred acquisition costs**

	2022	2021
	€000	€000
<b>Gross</b>		
At the start of the year	(10,463)	(7,656)
Movement in provision	(1,984)	(2,524)
Currency translation differences	189	(283)
At the end of the year	(12,258)	(10,463)
<b>Reinsurance amount</b>		
At the start of the year	8,535	6,195
Movement in provision	1,803	2,109
Currency translation differences	(157)	231
At the end of the year	10,181	8,535



Notes to the Financial Statements *continued***24 Creditors arising out of direct insurance operations**

	<b>2022</b>	2021
	€000	€000
Amounts owed to intermediaries	2,383	3,594
	2,383	3,594

All creditors are due within one year.

**25 Creditors arising out of reinsurance operations**

	<b>2022</b>	2021
	€000	€000
Amounts owed to third party reinsurers	8,831	5,581
Amounts owed to group reinsurer	33,182	42,179
	42,013	47,760

All creditors are due within one year.

**26 Other creditors including taxation and social security**

	<b>2022</b>	2021
	€000	€000
Insurance premium taxes	5,506	5,168
Amounts owed to group undertakings	15,563	10,021
Corporation tax payable	500	1,147
	21,569	16,336

All creditors are due within one year.

**27 Accruals and deferred income**

	<b>2022</b>	2021
	€000	€000
Reinsurers' share of deferred acquisition costs	10,181	8,535
Accrued expenses	458	582
	10,639	9,117

**28 Related party transactions**

As the Company is a wholly owned subsidiary of The Travelers Companies, Inc., it has taken advantage of the exemptions in FRS 102.33.1A not to disclose transactions or balances with other group entities which qualify as related parties.

Other than employees and directors' remuneration, which is disclosed in note 13, there are no other related party transactions that require disclosure.

## Notes to the Financial Statements *continued*

### **29 Commitments and contingent liabilities**

In the normal course of business, letters of credit to the value of \$0.1 million (2021 \$0.1 million) have been issued to fiscal authorities against insurance tax liabilities.

Letters of credit to the value of £0.2 million (2021 £0.2m) have been issued to the Society & Council of Lloyd's against insurance liabilities.

### **30 Immediate and ultimate parent company**

The immediate parent company is Travelers Insurance Company Limited, a company incorporated in England. The ultimate parent undertaking, which is the smallest and largest group that includes the Company's accounts in consolidation is The Travelers Companies, Inc., a company registered in the United States. Copies of The Travelers Companies, Inc. and Travelers Insurance Company Limited accounts can be obtained from this Company's registered office, Third floor, Block 8, Harcourt Centre, CharlotteWay, Dublin 2. Ireland or the Company's website: [www.travelers.ie](http://www.travelers.ie).

### **31. Post balance sheet events**

On 14 March 2023, an increase of €1 authorised ordinary shares from 100 million to 200 million was approved by the Board.

### **32. Approval of financial statements**

The financial statements of the Company were approved for issue by the Board of Directors on 3 April 2023.



**Travelers.ie**

Travelers Designated Activities  
Company is authorised by the Central  
Bank of Ireland.

Registered office:  
Third Floor Block 8, Harcourt Centre  
Charlotte Way, Dublin 2, Ireland  
Registered in Ireland No. 620416.