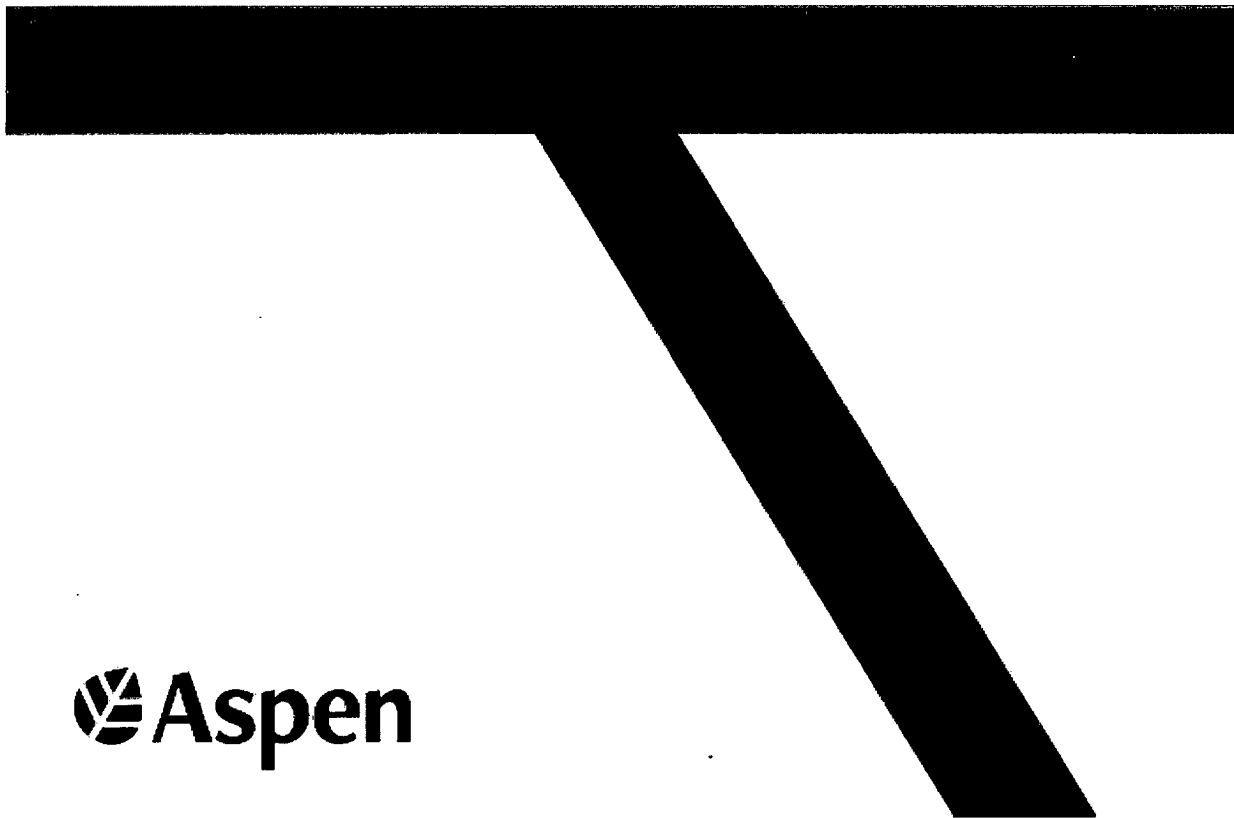




ASPEN INSURANCE UK LIMITED

ANNUAL REPORT AND FINANCIAL STATEMENTS

FOR THE YEAR ENDED 31 DECEMBER 2021



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CONTENTS	Page
THE COMPANY	3
STRATEGIC REPORT	4
DIRECTORS' REPORT	23
STATEMENT OF DIRECTORS' RESPONSIBILITIES	27
INDEPENDENT AUDITOR'S REPORT TO THE MEMBERS OF ASPEN INSURANCE UK LIMITED	28
INCOME STATEMENT: TECHNICAL ACCOUNT	38
INCOME STATEMENT: NON-TECHNICAL ACCOUNT	39
STATEMENT OF COMPREHENSIVE INCOME	39
STATEMENT OF CHANGES IN EQUITY	40
BALANCE SHEET	41
NOTES TO THE FINANCIAL STATEMENTS	43



THE COMPANY

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Paul Martin
Richard Milner
Christopher Jones
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Non-Executive Director
Non-Executive Director
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Non-Executive Director

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STRATEGIC REPORT

The Directors of Aspen Insurance UK Limited ("AIUK" or the "Company") present their report and the audited financial statements for the year ended 31 December 2021.

Overview of business

The principal activity of the Company continues to be the transacting of general insurance and reinsurance business in the UK, US and through its branches in Canada, Singapore and Australia.

The financial results for the Company reflect a loss before tax for the year of \$47.4m (2020: profit of \$11.9m). This comprised:

- an underwriting loss before investment income of \$4.7m (2020: \$44.7m loss);
- net other income of \$37.5m (2020: \$57.3m net other expenses); and
- an investment loss of \$80.2m (2020: profit of \$114.0m).

The net underwriting loss of \$4.7m (2020: \$44.7m loss) reflected a \$6.9m profit in the Company's reinsurance segment and a \$11.6m loss in the insurance segment.

The reinsurance segment reported an underwriting profit of \$6.9m in 2021 (2020: \$48.2m loss). Third party liability reported an underwriting profit of \$66.9m (2020: loss of \$23.2m). Property reported a loss of \$51.5m (2020: loss of \$14.2m), and Miscellaneous reinsurance reported a loss of \$12.5m (2020: loss of \$19.9m).

The reinsurance segment underwriting result in 2021 benefited from gross reserve development on Covid-19 losses of \$21.9m (2020: \$83.5m loss).

The 2021 reinsurance segment result is adversely impacted by some prior year reserve development and the results of the inwards reinsurance contract with its fellow subsidiary, Aspen Bermuda Ltd ("ABL"). The result of this ABL contract in 2021 was a loss of \$7.7m following the high frequency of catastrophe losses including the unseasonal losses from winter storm Uri.

The insurance segment reported a loss of \$11.5m in 2021 (2020: \$3.5m profit), driven by marine, aviation and transport reporting an underwriting loss of \$19.1m, which was primarily due to adverse prior year reserve development.

The insurance segment underwriting result in 2021 was impacted by gross Covid-19 losses of \$14.4m (2020: \$28.4m).

Other income of \$37.5m (2020: \$57.3m other expenses) related principally to foreign exchange gains.

The investment loss of \$80.2m (2020: \$114.0m gain), included investment income of \$37.3m (2020: \$39.8m), realised gains of \$1.7m (2020: \$28.4m loss), and unrealised losses of \$114.0m (2020: unrealised gains of \$48.9m) from government and corporate bonds and other investments. The primary driver of the unrealised investment losses was increases in interest rates causing mark to market losses on the bond portfolio.

During the year the company identified a material error of in the foreign exchange accounting relating to premium debtors, resulting in an overstatement of premium debtors of \$89.7m in the year end 2020 financial statements (see note 26). Consequently, the Company received two capital contributions of \$50m each from Aspen European Holdings Limited ("AEHL") in July 2021 in order to maintain its capital strength.



As a result, the Company met its ratings agency and regulatory capital requirements throughout 2021 and remains adequately capitalised for regulatory purposes for the future, finishing the year with a capital ratio of 1.57 (2020: 1.26).

As at 31 December 2021, the Company was a direct subsidiary undertaking of AEHL, a wholly owned subsidiary of Aspen Insurance Holdings Limited ("AIHL"). AEHL's registered office is 30 Fenchurch Street, London, EC3M 3BD. The ultimate parent company of the Group as at 31 December 2021 was Highlands Bermuda HoldCo, Ltd. incorporated in Bermuda. Highlands Holdings, Ltd. was renamed as Highlands Bermuda HoldCo, Ltd. on 5 March 2021.

Underwriting Portfolio Review

Over the past few years, the Directors have undertaken a strategic review of AIUK's underwriting portfolio. Where the Company has identified products which do not meet the Company's required underwriting performance criteria the Company has taken the decision to cease writing that product. Furthermore, the Company has also looked to move business between Aspen's entities in line with the Company's overall balance sheet simplification strategy. For example, in 2021 Aspen Managing Agency Limited ("AMAL") received approval to significantly grow the size of Aspen's Lloyd's syndicate during the year, and again for 2022. This growth is primarily driven by moving some existing portfolios of business from AIUK, the majority of which were in the reinsurance segment. Additionally, the Aspen Re America ("ARA") business written by Aspen AIUK will be written by Aspen American Insurance Company ("AAIC") from 2022. AIUK will receive \$19m in 2022 for the transfer of the ARA business to AAIC, all of which represents a gain to the Company as there is no associated transfer of assets and liabilities.

In February 2021, ABL ("Aspen Bermuda Limited") obtained approval for a new branch in Singapore. From 1 April 2021, all business which had previously been written through the AIUK branch in Singapore was written through the ABL Singapore branch. Business written through the AIUK Singapore Branch in Q1 was reinsured to ABL via a 100% quota share arrangement. In 2021 gross written premium in the Singapore branch was \$34.0m (2020: \$59.2m).

Following AMAL's approval from Lloyd's to increase the capacity of its Lloyd's platform Syndicate 4711 from 2022, the business currently written through AIUK's Australian Branch will be transitioned into Syndicate 4711. In 2021 gross written premium in the Australia branch was \$41.0m (2020: \$60.2m).

Following these transfers of business AIUK will continue writing reinsurance and insurance business in 2022. The reinsurance business will be restricted to recognising the balance of premiums on certain in-force policies as well as the continued reinsurance of ABL to diversify the Company's risk portfolio.

The insurance business in 2022 will include the continued writing of business in Canada as well as continuing to service its brokers and clients in the core UK Property and Casualty portfolio. Credit and political risks policies will also be underwritten by AIUK in certain situations where required.

Repositioning Reinsurance Coverage

Although the main driver of the reduced reinsurance spend from 2020 is the one-off recognition of reinsurance premium on an adverse development cover ("ADC") in 2020, there have also been reductions in the current year reinsurance costs (see page 11 for further information on the ADC).

The decrease in gross business written through AIUK has also resulted in the reinsurance spend reducing. The Company has reduced the amount of proportional cover on UK Liability, UK Commercial Property and UK Construction, whilst continuing to place a significant amount of casualty insurance and reinsurance business with a third-party capital quota share provider that provides beneficial ceding commission terms. Offsetting this the outwards whole account quota share reinsurance on the Company's UK portfolio increased from 60% to 70% in 2021.



Overview of the Business

The Company is authorised by the United Kingdom Prudential Regulation Authority to underwrite all eighteen classes of insurance and reinsurance business. The Company is rated A (Excellent) by AM Best and A- (Strong) by Standard & Poor's. An analysis of the technical account by segment for the years ended 31 December 2021 and 2020 is set out below.

	For the Year Ended 31 December 2021			For the Year Ended 31 December 2020		
	Reinsurance	Insurance	Total	Reinsurance	Insurance	Total
	\$m	\$m	\$m	\$m	\$m	\$m
Gross written premiums	903.1	368.9	1,272.0	1,000.4	344.6	1,345.0
Gross earned premiums	976.4	364.0	1,340.4	988.5	364.6	1,353.1
Net earned premium	532.2	54.0	586.2	383.7	56.7	440.4
Net incurred claims	(330.7)	(54.5)	(385.2)	(214.4)	(28.7)	(243.1)
Expenses	(194.7)	(11.0)	(205.7)	(217.5)	(24.5)	(242.0)
Underwriting loss before investment income	6.8	(11.5)	(4.7)	(48.2)	3.5	(44.7)
Investment return			(80.2)			114.0
Balance on technical account			(84.9)			69.3
Net claims ratio	62%	101%	65%	56%	51%	55%
Expense ratio	37%	20%	35%	57%	43%	55%
Combined ratio	99%	121%	100%	113%	94%	110%

We use the net claims ratio, the expense ratio and the combined ratio as measures of underwriting performance. These ratios are relative measurements that describe, for every \$100 of net premiums earned, the amount of losses and loss adjustment expenses, and the amount of other underwriting expenses that would be incurred.

The high expense ratio in 2020 is primarily related to the ADC reducing net earned premiums in 2020 with no corresponding adjustment to expenses. The 2021 expense ratio not impacted by the ADC premium recognition.

Reinsurance Segment

The reinsurance segment consists of property, casualty and specialty reinsurance. This segment includes Property Reinsurance business reinsured from ABL via a quota share arrangement. A more detailed analysis of the business written within these classes is as follows:

Property Catastrophe Reinsurance

Property catastrophe reinsurance is generally written on a treaty excess of loss basis where the Company provides protection to an insurer for an agreed portion of the total losses from a single event in excess of a specified loss amount. In the event of a loss, most contracts provide for coverage of a second occurrence following the payment of a premium to reinstate the coverage under the contract, which is referred to as a reinstatement premium. The coverage provided under excess of loss reinsurance contracts may be on a worldwide basis or limited in scope to selected regions or geographical areas.



Other Property Reinsurance

Other property reinsurance includes property risks written on an excess of loss basis and proportional treaties, facultative, or single risk reinsurance. Risk excess of loss reinsurance provides coverage to a reinsured where it experiences a loss in excess of its retention level on a single “risk” basis. A “risk” in this context might mean the insurance coverage on one building or a group of buildings for fire or explosion or the insurance coverage under a single policy which the reinsured treats as a single risk. This line of business is generally less exposed to accumulations of exposures and losses but can still be impacted by natural catastrophes, such as earthquakes and hurricanes.

Proportional treaty reinsurance provides proportional coverage to the reinsured, meaning that, subject to event limits where applicable and ceding commissions, the Company pays the same share of the covered original losses as it receives in premiums charged for the covered risks. Proportional contracts typically involve close client relationships which often include regular audits of the cedants’ data.

Casualty Reinsurance

Casualty reinsurance is written on an excess of loss, proportional, and facultative basis and consists of US treaty, international treaty and casualty facultative reinsurance. The Company’s US treaty business comprises exposures to workers’ compensation (including catastrophe), medical malpractice, general liability, auto liability, professional liability and excess liability including umbrella liability. The Company’s international treaty business reinsures exposures mainly with respect to general liability, auto liability, professional liability, workers’ compensation, transactional liability and excess liability. There are some insurance policies written through Delegated Underwriting Authorities for the above products for the US and international portfolios.

Specialty Reinsurance

Specialty reinsurance is written on an excess of loss and proportional basis and consists of agriculture reinsurance, mortgage reinsurance and insurance, marine, aviation, terrorism, engineering, cyber and other specialty lines. The Company’s agricultural reinsurance business covers crop and multi-peril business. Other specialty lines include some insurance policies written by Delegated Underwriting Authorities covering policyholders’ interests in marine, energy, aviation liability, space, contingency, engineering, terrorism, nuclear and personal accident.

As part of the underwriting portfolio review, the Company does not plan to write any new reinsurance business from 2022, except in cases where cedants have yet to approve the transfer of business on to a different Aspen platform, and in respect of the contract with ABL.

Insurance Segment

The Company’s insurance segment consists of property and casualty and energy and financial and professional lines insurance. A more detailed analysis of the business within these classes is as follows:

Property and Casualty Insurance

The Company’s property and casualty insurance line comprises commercial property, commercial liability, primary casualty, excess casualty and environmental liability written on a primary, excess, quota share, program, and facultative basis.

- Property insurance provides physical damage and business interruption coverage for losses arising from weather, fire, theft and other causes. The commercial team’s client base is predominantly U.K. institutional property owners, small and middle market corporate, and public sector clients.
- Commercial liability provides employers’ liability coverage and public liability coverage for insureds domiciled in the U.K. and Ireland. The team also covers directors’ and officers’ (“D&O”) and professional indemnity, predominantly to small and medium corporates.



- Primary casualty consists primarily of lines written within the primary insurance sectors, focusing on insureds in hospitality, real estate, construction and products liability.
- Excess casualty comprises large, sophisticated and risk-managed insureds worldwide and covers broad-based risks at lead/high excess attachment points, including general liability, commercial and residential construction liability, life science, trucking, product and public liability and associated types of cover found in general liability policies in the global insurance market.
- Environmental liability primarily provides both primary and excess coverage for contractors' pollution liability and pollution legal liability across industry segments that have environmental regulatory drivers and contractual requirements including: real estate and public entities, contractors and engineers, energy contractors, and environmental contractors and consultants.

Marine and Energy Insurance

The Company's marine and energy insurance line comprised onshore energy physical damage, offshore energy physical damage and specie written on a primary, excess, quota share, program and facultative basis.

- Onshore energy physical damage provides coverage for onshore energy and construction sector classes of business with a focus on property covers.
- Offshore energy physical damage (also known as upstream energy) provides coverage for property damage in addition to operators' extra expenses for companies operating in the oil and gas exploration and production sector.
- The specie line of business focuses on the insurance of high value property items on an all-risks basis including fine art, general and bank related specie, jewellers' block, and cash in transit coverages.
- Aviation writes physical damage insurance on airline hulls, aviation hull deductible covers and comprehensive legal liability for airlines, smaller operators or airline equipment, airports and associated business and non-critical component part manufacturers. This line of business was discontinued in 2018 and placed into run-off.
- Marine Hull insures physical damage to ships (including war and associated perils) and related marine assets. This line of business was discontinued in 2018 and placed into run-off.
- The marine and energy liability business includes marine liability cover mainly related to the liabilities of ship owners and port operators, including reinsurance of protection and indemnity clubs ("P&I clubs"). It also provides liability cover globally for companies in the oil and gas sector, both onshore and offshore and in the power generation sector. This line of business was discontinued in February 2020 and placed into run off.



Financial and Professional Lines Insurance

The Company's financial and professional lines comprises financial and corporate risks, accident and health, professional liability, management liability, credit and political risks, crisis management, surety risks and technology liability (cyber risks) written on a primary, excess, quota share, program, and facultative basis.

- The financial and corporate risks account comprises financial institutions business written on a primary and excess of loss basis and consists of professional liability, crime insurance and D&O covers for commercial and investment banks, asset managers, insurance companies, stockbrokers, and other similar entities. This account includes a book of D&O insurance for commercial insureds located outside of the U.S and a worldwide book of representations and warranties and tax indemnity business.
- The Company's professional liability business is written on both a primary and an excess of loss basis, focusing on risks in the U.K., Europe, Australia, and Canada. The Company insures a wide range of professions including lawyers, accountants, architects, engineers, doctors and medical technicians. This account also includes a portfolio of technology liability and data protection insurance. The data protection insurance covers firms for first party costs and third-party liabilities associated with their breach of contractual or statutory data protection obligations.
- Management liability insures a diverse group of commercial and financial institutions primarily on an excess basis, with coverages including D&O liability, fiduciary liability, employment practices liability, fidelity insurance and blended liability programs including E&O liability with a focus on risks predominantly headquartered in the US or risks with material US exposure.
- The credit and political risks team writes business covering the credit and contract frustration risks on a variety of trade and non-trade related transactions, as well as political risks (including multi-year war on land cover) and surety risks. The Company provides credit and political risks cover worldwide.
- The crisis management team writes insurance designed to protect individuals and corporations operating in high-risk areas around the world, including covering the shipping industry's exposure to acts of piracy. It also writes terrorism and political violence insurance, providing coverage for damage to property (largely fixed assets such as buildings) resulting from acts of terrorism, strikes, riots, civil commotion or political violence, in addition to product recall business.
- The surety team writes commercial surety risks, admiralty bonds and similar maritime undertakings including, but not limited to, federal and public official bonds, license and permits and fiduciary and miscellaneous bonds, focused on Fortune 1000 companies and large, privately owned companies in the US. Since July 2020 this business has been 100% reinsured to Aspen Specialty Insurance Company ("ASIC").
- Technology liability (also known as Cyber insurance) is written globally and provides coverage for technology, media and telecommunications firms offering protection for damages and legal defence expenses associated with financial loss claims from third parties and various forms of intellectual property breaches.
- The accident and health team focuses on insurance and reinsurance products which help protect individuals, groups and companies from the consequences of accidental death or disability whether resulting from accident or sickness. Cover written includes whole account treaty and facultative reinsurance protection for insurance companies. This line of business was placed into run off in March 2020.



As part of the underwriting portfolio review, the only classes of insurance business planned to be written and retained from 2022 are property, UK construction, commercial liability, primary casualty, and credit and political risk. A small portfolio will be written and 100% reinsured to ASIC including surety, US environmental and US financial and professional lines.

Investments

The Company maintains all its investments in high quality fixed income securities and liquidity funds. These investments, including liquidity funds, are currently managed by the following investment managers and custodians:

Blackrock Financial Management, Inc	Citibank
BNY Mellon Asset Servicing	UBS AG
CIBC Mellon	Manufacturers and Traders Trust Company
BNP Paribas	Apollo Asset Management Europe PC LLP

The Company uses derivative financial instruments to manage foreign exchange risk and asset and liability matching as part of a strategy of efficient portfolio management.

Balance Sheet

The balance sheet of the Company shows total assets of \$6,178.1m (2020: \$6,485.6m as restated) and shareholder's equity of \$963.6m (2020: \$875.8m as restated). Of the total assets, \$2,413.0m, 39% (2020: \$2,413.4m, 37% as restated) was represented by financial investments.

ADC Contract

On March 2, 2020, the Company's ultimate parent entered into an adverse development cover reinsurance agreement ("ADC") with a subsidiary of Enstar Group Limited ("Enstar"), pursuant to which Enstar's subsidiary will reinsure losses incurred on or prior to December 31, 2019. Enstar's subsidiary will provide \$770.0 million of cover in excess of \$3.805 billion retention up to an aggregate of \$4.575 billion, and an additional \$250.0 million of cover in excess above \$4.815 billion, up to \$5.065 billion. As a result of the ADC, the Company has significantly reduced exposure to claims from risks underwritten on or prior to December 31, 2019, and the Company expects the ADC to significantly reduce volatility from the Company's historical business going forward.

As at December 31, 2021, the Company's ultimate parent has recognised \$68.1 million of recoverable on the ADC of which \$20.4m has been recognised by the Company.

Enterprise Risk Management and Control Framework

The Board ensures that the Company operates an effective risk management and control framework, which includes risk management, compliance and internal control systems. The Company maintains appropriate policies, procedures and internal controls to support the risk and control framework.

Principal Risks and Uncertainties

Risk management has been embedded in the management and culture of the Aspen Group since its formation in 2002. The Company, as an operating entity within the Aspen Group, operates within the Group's established risk management practices.



The key risks for the Company are currently:

- Coronavirus - the impacts of coronavirus on the Company's clients and the markets in which it operates, investments (as a result of the impacts on the wider economy) and operations continue to be a key risk.
- Underwriting performance - although market conditions are improving, prior year losses highlight that achievement of appropriate underwriting performance remains a key risk to the Company. Portfolio management and risk selection remain the key mitigants to this risk.
- Impacts of organisational change - following the takeover of the Aspen Group by Apollo there has been and continues to be a significant level of organisational change. The level of organisational change means that the company continues to face a heightened exposure to operational risk.

Risk Management Approach

AIUK maintains a Risk Universe which defines the different types of risk that the Company faces and how they are monitored and measured. This framework has been applied and refined continuously and is approved each year by the Board. The Company operates an integrated enterprise-wide risk management strategy designed to deliver shareholder value in a sustainable and efficient manner while providing a high level of policyholder protection. The Company's Risk Committee provides enhanced oversight of the Company's risk management process. The execution of the Company's integrated risk management strategy is based on:

- The establishment and maintenance of an internal control and risk management system based on a three lines of defence approach to the allocation of responsibilities between risk accepting units (first line), risk management activity and oversight from other central control functions (second line) and independent assurance (third line);
- Identifying material risks to the achievement of the Company's objectives including emerging risks;
- The articulation at Group and Company level of the risk appetite and a consistent set of key risk limits for each material component of risk;
- Measuring, monitoring, managing and reporting risks and trends;
- The use, subject to an understanding of its limitations, of the Internal Model to test strategic and tactical business decisions and to assess compliance with the Risk Appetite Statements; and
- Stress and scenario testing, including reverse stress testing, designed to help the Company better understand and develop contingency plans for the likely effects of extreme events or combinations of events on capital adequacy and liquidity.

On 5 December 2015, the PRA approved the Company's Internal Model, which AIUK uses within its integrated risk management system, to calculate its Solvency II Regulatory Capital Requirement ("SCR"). The Internal Model is updated regularly and is currently undergoing a major change process through which Aspen is seeking approval for improvements to the modelling of credit risk and other components of the Internal Model.

Risk Appetite

In order to meet the expectations of its equity stakeholder, AIUK aims to maintain a level of profitability consistent with the Group return targets set out in the Group Risk Appetite statement, taking into account the contributions of other subsidiaries. AIUK also aims to generate sufficient distributable income to allow it to contribute its share of funding for the debt and dividend obligations of the Aspen Group.



The AIUK risk appetite and risk management process is aimed at ensuring that these objectives are met. The Risk Appetite statement approved by the Board articulates the Risk Appetite in terms of the following components:

- Risk Preferences is a high-level description of the types of risks AIUK prefers to assume and avoid within the context of the Company's objectives; and
- Capital Constraint is a minimum level of risk adjusted capital.

In addition to the high-level Risk Appetite statement the Company has established a set of Key Risk Limits covering exposures to natural and man-made catastrophe events, market risks, credit risks and operational risks. These are monitored and reported against to the Risk Committee on a quarterly basis. The risks are defined in the Risk Universe at 3 levels:

- Main risk classification;
- Risk category; and
- Risk sub category.

The main risks faced by the Company can be split between core risks and non-core risks. Core risks are those risks inherent in the running of the Company's business and listed below:

- Insurance risk: the variation of actual technical results relating both to exposures from business written in the period (underwriting risk) and exposures from business written in prior periods (reserving risk) from their expected values other than as a result of execution, operational or counterparty risks.
- Market risk: the risk of variation in the fair value of the investment portfolio, cash and cash equivalents and derivative contracts including the effect of changes in foreign currency exchange rates.

Non-core risks are all risks other than core risks. These are quantified as far as possible and, wherever practical, minimised or avoided. These are listed below:

- Credit risk: the risk of diminution in the value of insurance and reinsurance receivables as a result of counter-party default.
- Liquidity risk: the risk that funds from another group company are unavailable to AIUK in a stressed situation
- Operational risk: the risk of loss arising from inadequate or failed internal processes, personnel or systems, or from external events.
- Strategic risk: the risk of adverse impact on shareholder value or income and capital of adverse business decisions, poor execution or failure to respond to market changes.
- Emerging risk: the risk that events not previously identified emerge and impact the profitability and / or balance sheet of the Company.
- Regulatory risk: the risk of non-compliance with regulatory requirements including ensuring AIUK understands and complies with changes to those requirements is managed as an operational risk.



There is a residual risk that changes in regulation impact AIUK's ability to operate profitably in some jurisdictions or some lines of business.

- **Taxation risk:** the risk that the Company does not understand, plan for and manage AIUK's tax obligations is addressed as an operational risk. There is a residual risk that changes in taxation impact AIUK's ability to operate profitably in some jurisdictions or some lines of business.

Operational risk is the most complex of the non-core risk classifications because it includes multiple risk scenarios arising from multiple processes and circumstances. Because of this AIUK records identified operational risks and their related risk assessments, owners and identified controls through the risk and control self-assessment process. The Company considers conduct risk as part of operational risk and have specific processes to address it including a conduct risk forum and a specific quarterly conduct risk report to the AIUK Risk Committee.

Climate Change

A key emerging risk is climate change, the impacts of which are managed primarily via the Company's emerging risk process.

However, in line with the recent development of formalized structure and regulatory guidance on climate change risk and the guidance on the management and reporting of this risk, AIUK is developing a climate change risk framework as part of a wider Aspen initiative. This review will look at the various regulatory requirements on financial disclosures, policy considerations and capital considerations. As well as identifying climate change risks which AIUK is itself exposed to directly, and managing these aspects of the risk.

Global climate change may have a material adverse effect on the Company's operating results and financial condition if the Company does not adequately assess and price for any increased frequency and severity of catastrophes resulting from these environmental factors.

Global climate change could impair the Company's ability to predict the costs associated with future weather events and could also give rise to new environmental liability claims in the energy, manufacturing, and other industries served.

Given the scientific uncertainty of predicting the effect of climate cycles and climate change on the frequency and severity of catastrophes and the lack of adequate predictive tools, the Company may not be able to adequately model the associated exposures and potential losses in connection with such catastrophes which could have a material adverse effect on the Company's business, financial condition, or operating results.

The investment portfolio and credit and political risk underwriting exposures may be materially adversely affected by global climate change regulation.

As a result of the continuing drive to manage climate change, energy companies and other companies engaged in the production or storage of fossil fuels may experience unexpected or premature devaluations or write-offs of their fossil fuel reserves. As at 31 December 2021, \$40.3m, or 1.7% of the managed portfolio, was invested in the energy sector. Government policies to slow global climate change by, for example, setting limits on carbon emissions may also have an adverse impact on other sectors, such as utilities, transportation, and manufacturing. A material change in the asset value of fossil fuels or the securities of energy companies and companies in these other sectors may therefore materially adversely affect the investment portfolio and the results of operations and financial condition.

We provide credit and political risk insurance to banks and other institutions providing lending to government and private organisations. In some cases, the lending relates to private organisations involved in the energy sector or governments or government agencies which are dependent on fossil fuels for their revenue.



A material change in the asset value of fossil fuels may therefore materially adversely affect the Company's exposures to credit and political risk.

Coronavirus Outbreak - COVID 19

The ongoing COVID-19 pandemic, and the actions taken by the governments, businesses and individuals in response to the pandemic have resulted in, and may continue to result in, significant and ongoing economic and societal disruption, including significant market volatility. As new variants of the virus may continue to emerge, the Company sees the potential for a resurgence of the pandemic in certain key markets, which could adversely impact the Company's operations, financial condition, or liquidity.

The Company's exposures are controlled and limited by its insurance and reinsurance contracts, which include specific terms and conditions defining if and how policies respond to losses arising from the COVID-19 pandemic. However, legislative, regulatory or judicial actions and social influences may seek to extend coverage or payment terms beyond intended contractual obligations or result in an increase in the frequency or severity of claims beyond expected levels. There are ongoing lawsuits and other legal actions challenging the promptness of coverage determinations or the coverage determinations themselves on claims under applicable insurance or reinsurance policies, including, among others, business interruption claims, which could result in increased claims, litigation and related expenses. It is not possible to predict when or how litigation related to the COVID-19 pandemic and coverage disputes will be finally resolved, which further impairs the Company's ability to estimate potential insurance or reinsurance exposure. Further, there has been little change in the expected ultimate losses in recent reviews.

As the COVID-19 pandemic moves into the next phase Aspen is also transitioning to a status of living with the challenges of the remaining elements of the pandemic. Aspen has implemented a number of measures to allow the business and its stakeholders to move forward with confidence and flexibility. These measures have included a flexible approach to working patterns and office space utilisation.

Recognising the risks of continued remote working may bring as part of a hybrid combination of office and home working, during the last twelve months the organisation has taken a number of steps to upgrade the hardware provided to the Company's employees as well as the operational systems utilised which has increased the security of the Company's employees and organisation.

More generally, IT security continues to be a key focus of the management team. The business will continue to develop its mitigations and protections in regard to infrastructure and continuing training for all employees on cyber and data security.

We continue to follow guidelines and governmental mandates regarding COVID-19 protocols. While it is not possible to predict the administrative costs, compliance costs or impacts to the Company's available workforce, the Company continues to develop, and amend as needed, guidelines and testing processes. In addition, the Company is monitoring legal actions and pending legislation regarding the mandates for further guidance.

Further, the Company cannot predict at this time how the COVID-19 pandemic will impact demand for insurance and reinsurance products in the future. While the Company expects demand for (re)insurance may, as a result of the COVID-19 pandemic, increase in some lines of business, and decrease in others, the future impact of the COVID-19 pandemic on the industry and the Company's business will depend on a range of factors, including the duration of mitigation efforts and public acceptance of vaccines and/or other alternative treatments, the severity of the impact of mitigation efforts on businesses and business activity, the scope and efficacy of governmental stimulus and other relief efforts, the extent to which legislative or regulatory efforts or court cases succeed in shifting some of the burden of the pandemic to insurers (particularly for business interruption) on a retroactive basis, and the severity and duration of, and the speed of recovery from, recessionary impacts. the Company's disclosures should be read in the context of the evolving COVID-19 pandemic and the related uncertainties, whether or not specific reference is made thereto.



Agency Ratings

Ratings with respect to claims paying ability and financial strength have become increasingly important factors in establishing the competitive position of insurance and reinsurance companies and will also impact the cost and availability of capital to an insurance company. Ratings by A.M. Best and Standard & Poor's Financial Services LLC ("S&P") represent an important consideration in maintaining customer confidence in the Company and in its ability to market insurance products. Rating organisations regularly analyse the financial performance and condition of insurers.

The Company has held an S&P rating of "A-" (Strong) since March 2020 and an AM Best rating of "A" (Excellent) since April 2020, both of which have been maintained throughout 2021.

Both A.M Best and S&P are widely recognised insurance company rating agencies and some policyholders are required to obtain insurance coverage from insurance companies that have an "A-" (Strong) rating or higher.

Because A.M Best and S&P continually monitors companies with regard to their ratings, the Company's ratings could change at any time. Any downgrade in the Company's ratings may impair its ability to sell insurance policies and could materially and adversely affect its competitive position in the insurance industry, future financial condition and operating results.

Stakeholder Engagement

There is a growing recognition within the insurance industry of the value of high-quality stakeholder relationships. AIUK and the Company's holding company Aspen Insurance Holdings Limited ("AIHL") and its subsidiaries ("the Aspen Group") embraces this trend recognising that active stakeholder input helps to drive the legitimacy and sustainability of its business strategy. However, communication and engagement with Stakeholders has been particularly important and prevalent for the Company following the challenges faced by the industry over the past 12 months.

Engagement with stakeholders informs decision making throughout the organisation. At a strategic level, methods of engagement can vary depending on the issue and the business unit involved. However, senior leaders regularly and actively participate in regulatory and industry forums, listening to the perspectives of brokers, employees, policyholders and suppliers. Specific examples of the key stakeholder engagement undertaken at different levels within the Company to inform decision-making and enhance Board understanding are set out below.



Stakeholder Engagement – Summary of Activity

(Re)Insurance Customers/Brokers The Aspen Group provides insurance and reinsurance services to many domestic and international organisations	Employees The Aspen Group employs approximately 920 people globally, of which 442 people are in the UK	Shareholders The Aspen Group is committed to delivering long-term value for its shareholders
<p>The Company's (re)insurance partners, customers and brokers expect clear, transparent information and a prompt and effective claims handling service they can rely on. Regular engagement with brokers provides a better understanding of customer needs, as well as how continuous improvements in policy coverage and claims handling can be delivered. More broadly, the Company takes account of the current and future needs of (re)insurance customers, and this is one of the key issues in its stakeholder engagement generally.</p>	<p>The staff employed in the UK support Aspen Group activities other than those directly related to AIUK, including those related other Aspen UK entities and some global activities.</p> <p>The majority of the Company's staff are employed by Aspen Insurance UK Services Limited ("AIUKS") whilst the Zurich Branch of the Company employs one member of staff. AIUKS is a fellow subsidiary of AIHL. However, the Company's initiatives are serviced by AIUKS employees by way of an Intra Group Service Agreement.</p> <p>The success of AIUKS depends on the shared talent, skills and values of its employees. The Company's values include overt statements about seeking out and listening to feedback from employees and customers. The Company aims to be an employer of choice.</p> <p>The Company also monitors the perspectives of the workforce by deploying annual employee engagement surveys in addition to other mechanisms (set out below) and focuses on employment issues of people working beyond its existing workforce. This includes working with charities and other organisations to bring people from different backgrounds into Aspen, for example ex-military veterans. We also engage actively with third party suppliers whose employees support our business functions, sharing our corporate values and working with them to create strong relationships.</p>	<p>Following the Acquisition of AIHL, the Aspen Group is privately owned by certain investment funds managed by affiliates of Apollo Global Management.</p>
Material issues	Material issues	Material issues
	<p>Direct feedback & communication between executive management and employees</p> <p>During a period of significant change in the business, there has been a recognition of the importance of clear and timely communication from the Executive Committee and senior leaders. Global and local Town Halls are therefore held regularly, with questions always invited and responded to. These supplement weekly corporate newsletters as well as ad hoc email notifications as appropriate. The</p>	<p>The Aspen Group is a privately owned organisation and as such there is increased engagement with shareholders. Shareholders' interests are represented on the Board of the Aspen Group holding company, AIHL. The Group CEO and Chairman are responsible for driving shareholders' objectives and ensuring that strategy throughout the Group is consistent with shareholders' objectives.</p> <p>The Company's investment plans continued to be reviewed throughout the</p>



	<p>Ask the CEO mailbox continues to be publicised and utilised, and all questions and comments receive timely responses.</p> <p>A range of other two-way engagement approaches have been introduced as part of the Company's cultural transformation and in order that the Company takes into account the needs and views of the Company's employees.</p>	year to ensure appropriate returns for shareholders.
<p>COVID-19</p> <p>The Company has adapted well operationally to ensure the Company's (re)insurance customers and brokers have not been affected by the operational change to remote working, which was required as a result of the national COVID-19 government lockdown. The Company had introduced various strategies such as the process of monitoring the business continuity for all teams weekly to ensure issues are identified and resolved. Whilst this covered primarily IT issues it has become a pre-emptive tool to allow any potential issues to be raised and addressed.</p>	<p>COVID-19</p> <p>As part of its longer-term premises strategy and in part as a response to the pandemic, the Company has formally introduced a hybrid working model. This supports employees to work some days in the office and some at home each week. This model has been largely welcomed by employees.</p>	
<p>Key strategic changes</p> <p>The Aspen Group has made various structural changes that have impacted upon the Company (discussed further below). Executive management have directly engaged with customers to obtain feedback on changes, as well as provide frequent and thorough update of any changes.</p> <p>The Aspen Group has engaged a global PR agency to assist with the efficiency and consistency of communication across all regions.</p>	<p>Corporate Social Responsibility</p> <p>The Aspen Group has a number of permanent staff committed to continually implementing new initiatives to support global and local charities, and drive climate change initiatives.</p>	
	<p>Diversity and Inclusion ("D&I")</p> <p>The Aspen Group has targeted D&I as a strategic focus in 2021, recognising that an inclusive and diverse organisation will underpin business success. It has built a governance model for increasing diversity and inclusion that is based on 3 workstreams, made up of employees from across the business, who work in partnership with HR experts to agree and drive forward an agenda to attract and build diverse talent, and to build inclusion. These workstreams are chaired by employees and each has an Executive Committee sponsor. They report into a D&I Delivery Board which in turn reports to the Group Executive Committee.</p>	



Regulatory bodies	Suppliers and contractors	Local communities
Effective communication with regulators is a key aspect of the Company's engagement activity	Effective management of the supply chain is critical to the overall success of the Company	The Company places importance on its responsibilities to the communities in which it operates
Regulators play a central role in shaping the insurance sector. Engagement is especially important in working to modernise compliance, regulatory, and legal risk management programs to meet applicable laws, regulations, and oversight and monitoring expectations. Aspen works constructively with UK regulators, especially during this period of significant change for the Company, to protect the long-term interests of (re)insurance customers and keep pace with industry standards as a whole.	The Company relies on its supply chain and sourcing to provide services to Aspen on a statutory or project basis. The Aspen Group aims to build strong relationships with suppliers and contractors so it can maximise cost efficiencies and alignment with its brand, technology, strategies and transformation/change programmes.	The Aspen Group is committed to supporting the communities in which it operates, including local businesses, charities and the wider public. Aspen engages with groups that focus on social and educational related issues on behalf of society. Two-way relationships with the Company's charity partners, also provide opportunities for different parts of the business to unite around a common cause.
Examples Senior management (in conjunction with the Company's Compliance department) have maintained consistent and ongoing communication with various regulators such as the PRA and FCA to explain organisational changes. Examples include the Company's departures from existing lines of business.	Examples The Company's Supply Chain and Sourcing (Procurement) function continues to focus on 3rd party engagement and liaison with suppliers.	Examples Corporate Social Responsibility – the Aspen Group has a number of permanent staff committed to continually implementing new initiatives to support global and local charities and drive climate change initiatives through: i. corporate partnership with international and development organisations; ii. setting up The Aspen Green Team to implement environmentally focused best practices; and iii. promoting a culture of local and collaborative volunteerism.
The annual Group Supervisory College was conducted in which regulators from the various jurisdictions met to discuss: the changes in management undertaken within the Aspen Group; a focus on total value creation; key milestones; business results in connection with market conditions and the impact, strategic initiatives, underwriting position and financial performance; liquidity position across the Aspen Group; COVID-19 results and plans to reduce financial threats on the Group performance; balance sheet simplification; and a more robust approach to governance and decision making.	Where there may be any impact on suppliers as a result of organisational change, they have been informed of relevant changes at an early stage to discuss the impact such changes may have on the supply or their services, and to minimise any potential disruptions to customers.	
Risk and Compliance governance overhaul - the Company's governance model continued to be reviewed and a revised governance model including additional meetings will be fully embedded by Q2 2022. In addition, the risk management reporting will be renewed with a clear set of key risk indicators incorporating all aspects of the UK and Group operations.	The Company monitors the quality and timeliness of services provided by third party providers to ensure compliance with regulatory and legislative requirements (such as the Modern Slavery Act and the FCA's outsourcing provisions contained in the Senior Management Arrangements, Systems and Controls sourcebook).	
Capital management - the Company's Board of Directors are regularly updated as to the capital position of the organisation through the quarterly Chief Risk Officer report. The Company's Board are able to determine the current level of capital buffer		



against their own predetermined risk appetite levels. The Board agree the most suitable level of capital buffer for the entity on an annual basis given the current requirements and predicted business for the coming 12 months. This is then monitored and managed appropriately through the year with the aim to ensure the Company has a buffer above the regulatory requirement.		
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Employee engagement

As noted above, the majority of the Company's UK personnel are employed by Aspen Insurance UK Services Limited ("AIUKS") whilst the Zurich Branch of the Company employs one member of staff. AIUKS is a fellow subsidiary of AIHL. However, the Company's initiatives are serviced by AIUKS employees by way of an Intra Group Service Agreement.

The success of the Company depends on the collective talent, skills and values of its employees. Accordingly, the Company is committed to employee engagement at all levels. Examples of employee engagement initiatives during 2021 include:

Providing employees systematically with information on matters that concern them	<p>Executive Management circulate "Corporate Communication" emails whenever there is a key change to the business and its operations, personnel or the insurance market. The emails are comprehensive and frequent. Additionally, project managers and local functions present Town Hall meetings to all of the Aspen Group, with each Town Hall involving an interactive Q&A component where employees are encouraged to raise questions.</p> <p>During 2021, the London office of the UK business re-opened. There were UK-wide as well as local communications about the process for a safe return to the office, with inductions held to support people returning to the refurbished offices. There have also been significant discussions and support for the introduction of a new hybrid model of working, which has responded directly to the needs expressed in the 2020 employee engagement survey.</p>
Consulting employees on a regular basis so that their views can be taken into account in making decisions which are likely to affect their interest	<p>UK EMPLOYEE FORUM</p> <p>The UK Employee Forum (UKEF) co-chaired by the AIUK CEO and Head of HR Business Partners provides a formal means to consult with employee representatives from the various business areas.</p> <p>The forum presents updates and ideas to employees as well as listen to their views and any concerns. Representatives are able to raise ideas and questions with senior management and consider their responses.</p> <p>ENGAGEMENT SURVEY</p> <p>An employee engagement survey was conducted across Aspen Group in November 2020, with results communicated to the business at the end of 2020 and early 2021. Action plans were drawn up in early 2021 in response to employee views expressed in the survey and changes made within the business including the following:</p> <ul style="list-style-type: none"> • Introduction of a new employee recognition process; • Town Halls and other communications that clarify organisational structure; • Streamlined organisational structures; and • The launch of a new learning management system, changes to the performance management process, introduction of leadership and management training. <p>In response to employee feedback the next survey took place in Q1 2022. Questions mirrored those from the 2021 survey in order to measure change and the results are in the process of being analysed.</p>



	<p>CULTURE</p> <p>Aspen Group launched a refresh of its culture in 2021, including creating a new values and behavioural framework that has been explicitly designed to support the business's strategic objectives. The framework was developed following a range of interviews and focus groups with employees and the Executive Committee members and drew on the results of the 2020 engagement survey.</p> <p>The ongoing work to embed these values includes regular check ins with a cohort of colleagues from across Group (and well-represented in the UK) known as Aspen Advocates. They are role models for the target culture and have provided input into:</p> <ul style="list-style-type: none"> • The values and behavioural framework; • How to embed the refreshed culture; • Progress of the business in building its refreshed culture, including areas for additional focus, which can then be actioned; and • The quality and content of Executive Committee Town Halls, so that they can be tailored to be best meet employee needs. <p>This engagement process was also a key driver in the development of Aspen Group's new brand, which was launched alongside the refreshed values in May 2021. Employee feedback was a significant element in the evolution of the brand.</p>
<p>Encouraging the involvement of employees in the company's performance</p>	<p>DIVERSITY AND INCLUSION</p> <p>During 2021, the 3 workstreams noted above were responsible for delivering an extensive D&I remit across the Aspen Group with very active engagement in the UK. Activities which have involved colleagues include:</p> <ul style="list-style-type: none"> • A programme of events to celebrate International Women's Day, Gay Pride Month and UK Black History Month. This last event featured a panel discussion in which 4 employees discussed their lived experience and answered questions from the audience and shared their views of race and ethnicity in the UK; • The establishment of In My Shoes, a reverse mentoring programme in which colleagues who have a variety of different life experiences mentor a senior colleague. The intention is to build a more inclusive and informed organisation; • The creation of Breakthrough, a programme for mid-level female leaders to be sponsored by members of the Executive Committee; and • The establishment of Employee Resource Groups for race and for gender. Chairs have been appointed in 2021 and in 2022 the focus will be on building membership. These Groups will be open to all Aspen Group employees (with ERGs for race and for gender established in the UK); and the intention is to provide a network for people with a shared interest to support and influence the development of Aspen as a diverse and inclusive organisation. <p>EMPLOYEE ENGAGEMENT IN CHANGE</p> <ul style="list-style-type: none"> • The Aspen Group always follows appropriate legislation when undertaking change exercises, including obligations to consult in the UK; • In 2021, the business has introduced a range of additional activities to support good two-way communication and engagement in support of change; • Change Champions: employees who act as key stakeholders in supporting the design and development of processes, systems etc. they also act as conduits for two-way communication between employees and leaders, and they are role models for Aspen's values; • Feedback and response: employees are invited to provide feedback in a confidential environment on strengths and areas for development so that local leaders can target critical issues; and • Innovation Competition: Employees were invited to propose business-focused innovation ideas to a panel of business representatives and Executive Committee members. 3 were selected and are being developed through to delivery.



<p>Achieving common awareness of the financial and economic factors affecting Aspen's performance</p>	<ul style="list-style-type: none"> • Ensuring that Aspen's employees are fully aware of and actively engaged in the business is a key component of its refreshed culture; • Aspen Group delivers quarterly all-staff updates and announcements and encourages feedback on the key financial and economic conditions affecting the Aspen group; • The Corporate Communications and Town Hall meetings (as referred to above) throughout 2021 were the key medium to communicate such updates, however each department's Line Manager is responsible for discussing performance issues with the employees within their team; and • The Aspen Group introduced a range of training and development programmes including sessions on understanding the financial and economic context for the business's activities. Local teams also host or participate in events in which colleagues from elsewhere in the business or external speakers provide insights into specific functions or factors that influence Aspen's performance.
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Future Developments

Subsequent to the year end the Aspen Group has entered into a Loss Portfolio Transfer ("LPT") arrangement with Enstar. This transaction builds on the Adverse Development Cover Aspen agreed with Enstar in 2020, replacing it with an LPT for all losses for the 2019 and prior accident years of account. This transaction is for \$450m of Group adverse development which attaches at the Group's \$3.12bn of Q3 2021 net reserves from 2019 and prior accident years and operates on a funds withheld basis, with the assets equal in value to any remaining net reserves transferring in September 2025. The risk premium for the LPT for the Aspen Group is \$10m. It is anticipated that all closing conditions will be met in by Q2 2022.

Section 172 statement

The Board factored the needs and concerns of the Company's stakeholders into its decisions in accordance with section 172 of the Companies Act 2006. The importance of the Company's stakeholders is outlined in more specific detail above, however examples of key decisions taken by the Board during 2021 include:

- **Key strategic changes** - there have been a number of changes to executives and senior management, including the appointment of a Non-Executive Director as Chair of the Audit Committee. A complete strategic review of the Company's business and culture was also undertaken, in order to improve underwriting performance, governance, financial strength (by simplifying the Aspen Group balance sheet) and the culture for employees across the Aspen Group. As a result, various changes have been implemented, including:
 - Underwriting - ongoing refinement of the Company's underwriting portfolio, which resulted in improved underwriting performance. The Company's refinement of its underwriting portfolio in 2021 has included a significant streamlining of the portfolio.
 - Structural changes – a significant amount of business has been moved out of AIUK in line with the Company's overall balance sheet simplification strategy. As part of this activity, existing portfolios of primarily reinsurance business have been transferred to AMAL and ARA business previously written by AIUK will be written by AAIC from 2022. Also, the Company's branches in Switzerland and Singapore are now in run-off, with new business underwritten in these locations by branches of Aspen Bermuda Limited. The Company's Australia Branch ceased writing new business as of 31 December 2021. Business is underwritten in Australia into Aspen Lloyd's Syndicate 4711 via an internal Australian cover holder, Aspen Australia Service Company Pty Ltd.
 - Risk and Compliance governance overhaul - the Aspen group risk management team created a new set of risk documentation which includes (but is not limited to): risk strategy; risk management



framework; risk appetites for the company and other UK entities; new risk policies for financial risk (market, credit, liquidity); insurance and reinsurance risk; operational risk, regulatory and legal risk, ORSA policy; and outsourcing policy. The risk management processes were updated throughout the year, with a refreshed risk taxonomy, a new risk and control self-assessment process and a new risk partnering model across the UK entities.

- Cultural - as outlined in detail under the climate change, charitable and political donations and stakeholder engagement sections of this report, the company, in conjunction with the wider Aspen group, is seeking to make changes that will benefit its employees, customers, suppliers, shareholders and the community as a whole.
- **COVID-19** – The Company until Q4 2021 remained a primarily home working company since the first COVID-19 lockdown in March 2020. As part of its longer-term premises strategy and in part as a response to the pandemic, the Company has formally introduced a hybrid working model at the end of 2021. This supports employees to work some days in the office and some at home each week. This model has been largely welcomed by employees.
- **Head Office refurbishment** – The Company renewed its Lease of 30 Fenchurch Street and the new office layout was finished during 2021 with a significant investment in collaboration and open working spaces for staff.

The Company is firmly committed to high standards of corporate governance and maintaining a sound framework for the control and management of the business. The Board recognises that effective governance is key to the implementation of strategy for the Company's shareholder and wider stakeholders. As a major UK general insurer, the Company is familiar and comfortable with the corporate governance practices expected of it and the legislation applicable to Public Interest Entities. The Company also complies fully with the corporate governance requirements of the Companies Act 2006, the Companies Miscellaneous Reporting (Regulations) 2018 and Financial Services and Markets Act 2000 (and regulations made thereunder) applicable to it as a result of its (re)insurance business.

By order of the Board

Richard Milner
Director
8 April 2022



DIRECTORS' REPORT

The Directors have pleasure in submitting their annual report, together with the audited financial statements for the year ended 31 December 2021.

Principal Activity

The principal activity of the Company continued to be the transacting of general insurance and reinsurance business in the UK, US and through its branch in Canada, Singapore and Australia.

The Directors have looked to move business within Aspen's entities in line with the Company's overall balance sheet simplification strategy. As part of this activity, during 2021 existing portfolios of primarily reinsurance business have been transferred to AMAL, and ARA business previously written by AIUK was transferred to AAIC. Also, the Company's branches in Switzerland and Singapore are now in run-off, with new business underwritten in these locations by branches of Aspen Bermuda Limited. The Company's Australia Branch ceased writing new business as of 31 December 2021. Business is underwritten in Australia into Aspen's Lloyd's Syndicate 4711 via an internal Australian cover holder, Aspen Australia Service Company Pty Ltd.

Results and Dividends

The results for the year are set out in the accompanying Income Statement. The loss before tax for the year was \$47.4m (restated 2020: profit \$11.9m). The Directors regard the current state of affairs of the Company and its future prospects as satisfactory. No dividends (2020: Nil) were paid during the year to the Company's only shareholder AEHL.

Financial Instruments

Details of financial instruments are provided in Note 13.

Directors and Directors' Interests

The Directors of the Company at the date of this report are set out on page 3. Changes in directors during 2021 and up to the date of this report are as follows:

	<u>Date of appointment</u>	<u>Date of resignation</u>
Paul Cooper	24 March 2021	
Christopher Jones	13 May 2021	
Michael Cain		19 May 2021
Robert Moorehead-Lane	3 June 2021	
Gordon Ireland		30 June 2021
Peter Webster		30 June 2021
Paul Martin	3 February 2022	

According to the Register of Directors' interests, no Director had a disclosable interest in the shares of the Company, and no Director had been granted or had exercised any right to subscribe for such shares during the period under review.

Directors' and Officers' Liability Insurance

The Company has maintained insurance to cover directors' and officers' liability as defined by section 236 of the Companies Act 2006.



Employees

The Company has no employees of its own in the UK. The majority of the Company's UK personnel are employed by Aspen Insurance UK Services Limited ("AIUKS"). AIUKS is a fellow subsidiary of Aspen Insurance Holdings Limited ("AIHL"). However, the Company's initiatives are serviced by AIUKS employees by way of an Intra Group Service Agreement. AIUKS encourages its employees to develop their full potential by providing opportunities for training and professional development. Such opportunities, as well as career development and promotion, are equally available to disabled employees, whether newly recruited or existing employees who become disabled whilst in AIUKS's employment.

AIUKS's equal opportunities policy aims to ensure that no potential or existing employee receives less favourable treatment because of his / her sex, actual or perceived sexual orientation, gender (including gender reassignment), marital or family state, age, ethnic origin, disability, race, colour, nationality, national origin, creed, political affirmation, part-time status, or any other condition, unless it can be shown to be legally justifiable.

Going Concern

The Directors confirm that they are satisfied that the Company has adequate resources to continue in operation and meet its liabilities as they fall due for a period of at least 12 months from the date that the financial statements are approved.

Accordingly, they continue to adopt the going concern basis in preparing the financial statements.

Charitable and Political Donations

The Company made charitable donations during the year of \$0.1 million (2020: \$0.5 million), with \$11.9k of the total contributed by employee matching fund activity. The donations were to organisations engaged in cancer research, children with disability, providing food to the underprivileged, ex-service men and women with disabilities and to a community project in Uganda. There were no political donations made during the year.

Streamlined Energy & Carbon Reporting disclosure – January 2021 to December 2021

Emissions are collated over a 12-month period from 1 January 2021 to 31 December 2021 and where necessary are calculated by converting consumption data into tonnes of carbon equivalent (tCO₂e) using the UK's Department for Business, Energy and Industrial Strategy (BEIS) 2019 factors.

The Company is committed to reduce its energy consumption. The company leases space in LEED or EnergyStar certified facilities, has installed smart electricity meters and selects renewable energy providers through electric utility programs.

In 2021, the Company's total global corporate travel was 120,809 miles. In 2021, due to the inability to accurately ascertain power consumption data due to office closures, work from home etc., and based on the Carbonfund.org's recommendation, the Company chose to estimate power consumption based off of office square footage. The total square footage of all the Company's office facilities in the UK was 63,857 square feet. The Company's total global emissions for 2021 was calculated by the Carbonfund.org to be 2,758 metric tonnes. Work is ongoing to establish the scale of the purchase of the actual offset credits and programs.



	2021 (CO ₂ tonnes)	2020 (CO ₂ tonnes)
Emissions from combustion of gas tCO ₂ e (Scope 1) ^A	155.7	142.8
Emissions from purchased electricity (Scope 2, location-based) ^B	332.7	400.8
Emissions from employee business travel which the company does not own or control and where not responsible for purchasing the fuel (Scope 3) ^C	30.1	242.8
Energy consumption used to calculate above Scope 1 and 2 emissions(kWh)	2,416,911.0	2,342,611.5
Intensity ratio		
Total tCO ₂ e per Full-Time Employees (FTE) ^D	1.1	1.0

^A Scope 1 covers GHG emissions from gas purchased for own use

^B Scope 2 covers GHG emissions from electricity purchased for own use

^C Scope 3 covers indirect emissions from business travel. Business travel for these purposes comprises of global flights and ground transport.

^D Intensity ratio calculations have been calculated using location-based emission factors only

Future Developments

The Directors aim to continue the strategic plan to improve profitability through re-underwriting the Company's portfolios in both insurance and reinsurance, exiting underperforming business, transferring portfolios to other Aspen entities and strengthening the reserve position, and reducing the operating cost base. Although the (re)insurance market remains competitive and there remains an abundance of available capital, market conditions and rates in the Company's remaining product lines are strengthening, which is expected to continue through 2022. As the rate environment improves, the Company continues to seek opportunities to deploy capital most efficiently to achieve attractive risk-adjusted returns. The Company has taken steps to streamline operations and to more closely align production offices with the Company's customer base and underwriting teams are positioned to identify and capitalise on acceptable business to underwrite without sacrificing underwriting discipline. The Company expects expenses to continue the downward trend seen since 2017, following the success of projects addressing operating efficiencies through outsourcing, streamlining and staffing reductions.

While no material impact to the Company has yet arisen from the events in Ukraine, there remains considerable uncertainty on the ultimate outcome. Refer to note 25 in the notes to the financial statements for additional comments of the impact of the situation in Ukraine and Russia on the Company.

Statement of Disclosure of Information to the Company's Auditor

The Directors who held office at the date of approval of this Directors' report confirm that, so far as they are each aware, there is no relevant audit information of which the Company's auditor is unaware; and each director has taken all the steps that he/she ought to have taken as a director to make himself/ herself aware of any relevant audit information and to establish that the Company's auditor is aware of that information.



Auditor

In June 2020, Aspen's Audit Committee approved conducting a competitive selection process to determine the Group's independent registered public accounting firm for the fiscal year ending December 31, 2022. The Committee invited several international public accounting firms to participate in this process. As a result of this process, the Company's Audit Committee intends to engage Ernst & Young LLP ("Ernst & Young") as the Company's independent auditor for the fiscal year ending December 31, 2022, subject to completion of its standard client acceptance procedures.

By Order of the Board

A handwritten signature in black ink, appearing to read 'R.T. Milner'.

Richard Milner
Director
8 April 2022

30 Fenchurch Street
London, U.K.
EC3M 3BD



STATEMENT OF DIRECTORS' RESPONSIBILITIES IN RESPECT OF THE STRATEGIC REPORT, THE DIRECTORS' REPORT AND THE FINANCIAL STATEMENTS

The directors are responsible for preparing the Strategic Report, 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 UK accounting standards and applicable law, including FRS 102 *The Financial Reporting Standard applicable in the UK and Republic of Ireland*.

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 state of affairs of the Company and of its profit or loss for that period. In preparing the 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 UK 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 to cease operations, or have no realistic alternative but to do so.

The directors are responsible for keeping adequate accounting records that are sufficient to show and explain the Company's transactions and disclose with reasonable accuracy at any time the financial position of the Company and enable them to ensure that its financial statements comply with the Companies Act 2006. They are responsible for such internal control 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 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.

Under applicable law and regulations, the directors are also responsible for preparing a Strategic Report and a Directors' Report that complies with that law and those regulations.

The directors are responsible for the maintenance and integrity of the corporate and financial information included on the Company's website. Legislation in the UK governing the preparation and dissemination of financial statements may differ from legislation in other jurisdictions.



INDEPENDENT AUDITOR'S REPORT TO THE MEMBERS OF ASPEN INSURANCE UK LIMITED

1 Our opinion is unmodified

We have audited the financial statements of Aspen Insurance UK Limited ("the Company") for the year ended 31 December 2021 which comprise the Income Statement, Statement of Comprehensive Income, Statement of Changes in Equity, Balance Sheet and the related notes, including the accounting policies in Note 1.

In our opinion the financial statements:

- give a true and fair view of the state of Company's affairs as at 31 December 2021 and of its loss for the year then ended;
- have been properly prepared in accordance with UK accounting standards, including FRS 102 *The Financial Reporting Standard applicable in the UK and Republic of Ireland*; and
- have been prepared in accordance with the requirements of the Companies Act 2006.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK) ("ISAs (UK)") and applicable law. Our responsibilities are described below. We believe that the audit evidence we have obtained is a sufficient and appropriate basis for our opinion. Our audit opinion is consistent with our report to the audit committee.

We were first appointed as auditor by the directors in 2002. The period of total uninterrupted engagement is for the 20 financial years ended 31 December 2021. We have fulfilled our ethical responsibilities under, and we remain independent of the Company in accordance with, UK ethical requirements including the FRC Ethical Standard as applied to public interest entities. No non-audit services prohibited by that standard were provided.

2 Key audit matters: our assessment of risks of material misstatement

Key audit matters are those matters that, in our professional judgement, were of most significance in the audit of the financial statements and include the most significant assessed risks of material misstatement (whether or not due to fraud) identified by us, 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. We summarise below the key audit matters (unchanged from 2020) in decreasing order of audit significance, in arriving at our audit opinion above, together with our key audit procedures to address those matters and, as required for public interest entities, our results from those procedures. These matters were addressed, and our results are based on procedures undertaken, in the context of, and solely for the purpose of, our audit of the financial statements as a whole, and in forming our opinion thereon, and consequently are incidental to that opinion, and we do not provide a separate opinion on these matters.



Claims Outstanding (2021: \$3.8bn, 2020: \$3.8bn)

Refer to page 46-48 (accounting policy) and page 75 (financial disclosures)

Risk vs 2020: ◀▶

The risk	Our response
<p>Subjective valuation:</p> <p>Insurance liabilities represent the single largest liability for the Company. Valuation of these liabilities, especially in respect of the incurred but not reported (IBNR) component, is highly judgemental as it requires a number of assumptions to be made in respect of ultimate loss ratios, frequency and severity of claims all of which carry high estimation uncertainty. The determination and application of the methodology and performance of the calculations are complex. COVID-19 related uncertainty remains a driver of the risk in this area due to the impact on the economic environment in 2021 and potential for unexpected claims notifications, especially on the inwards reinsurance portfolio and legislative and regulatory uncertainty in respect of the final quantum of open/notified claims</p> <p>Certain lines of business have greater inherent uncertainty, for example those where claims emerge more slowly over time, or where there is greater variability in claim settlement amounts.</p> <p>A margin is added to the actuarial best estimate to make allowance for specific uncertainties associated with the estimation of insurance liabilities. The appropriate level of margin to recognise is a subjective judgement based on the level of uncertainty and potential for volatility in the claims experience.</p> <p>Case reserves for reported claims, whilst less subjective, compared to other data inputs into the projection of the IBNR, carry the risk of management bias through understatement of the level of reserves held for open claims and risk of error due to the identified weaknesses in the control environment. Given the size of these reserves, and the consequent impact on the development factors used in the projection of the IBNR, we consider this to form part of the key audit matter.</p> <p>The effect of these matters is that, as part of our risk assessment, we determined that IBNR has a high degree of estimation uncertainty, with a potential range of reasonable outcomes greater than our materiality for the financial statements as a whole, and possibly many times that amount. The financial statements (note 2) disclose the sensitivity estimated by the Company.</p>	<p>Our procedures included:</p> <p>Our actuarial expertise</p> <p>We used our own actuarial specialists to assist us in performing our procedures in this area.</p> <p>Control design, observation and operation</p> <p>We evaluated and tested the design and implementation of the controls within the reserving process, including the scrutiny applied by the Reserving Committee in respect of the reserves set for the not reported claims. We assessed the qualifications and experience of those responsible and examined the output of the reviews to evaluate the scope and depth of this process.</p> <p>We performed the tests below rather than seeking to rely on the above control because the nature of the balance is such that we would expect to obtain audit evidence primarily through the detailed procedures described.</p> <p>We tested the design and implementation of other controls within the reserving process, including controls over the setting and approval of case reserves for reported claims. Our testing identified weaknesses in the design and operation of controls over reported claims. As a result we expanded the extent of our detailed testing over and above that originally planned.</p> <p>Substantive testing</p> <p><i>Historical comparison</i></p> <p>We assessed the assumptions adopted in respect of ultimate loss ratios, frequency and severity of claims by comparing to relevant historical company experience data and our expectations derived from our industry knowledge and experience.</p> <p><i>Sector experience and benchmarking assumptions</i></p> <p>We evaluated the appropriateness of assumptions, reserving methodologies and estimates of losses including those of total losses on natural catastrophes and COVID-19 by comparing to expectations derived from our understanding of current trends in loss development, taking into account our knowledge of regulatory and legislative developments where relevant, and benchmarking against our knowledge of industry trends.</p> <p><i>Independent re-performance in respect of the actuarial best estimate</i></p> <p>We used our own modelling tools to re-project ultimate losses for certain individual classes of business. The determination of which classes to re-project was based on risk assessment and consideration of the evidence available from other alternative data analysis procedures. We re-projected a greater number of classes in the 2021 year end audit reflecting the non-reliance on controls and the continued uncertainty in the economic environment.</p> <p><i>Assessment in respect of margin</i></p> <p>We assessed reserving strength, in particular the level of margin held, with reference to our independently determined reasonable range and our professional judgement.</p> <p><i>Assessing principles</i></p> <p>For a sample of declined COVID-19 claims, including those for business interruption in the UK, we evaluated the rationale for the denial of the claim by reference to policy wordings and where relevant, comparing the policy wording to the Supreme Court judgement on the FCA test case.</p>



	<p><i>Test of detail</i></p> <p>For a sample of individual reported claims, we agreed the reserve booked to third party evidence such as loss notification information from cedants and loss adjuster reports.</p> <p>For a sample of individual reported claims recorded after the year end, we checked the loss notification date to the period in which the Company had recognised the loss to ensure these were recorded appropriately in the correct period.</p> <p>Our result</p> <p>We found the valuation of the claims outstanding liability to be acceptable (2020: acceptable).</p>
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Gross Written Premiums – Inwards Reinsurance (2021: \$0.9 bn, 2020: \$1 bn)

Debtors arising out of reinsurance operations (2020: \$0.5bn, 2020: \$0.6bn)

Refer to page 46-48 (accounting policy) and page 64 (financial disclosures)

Risk vs 2020: ◀▶

The risk	Our response
<p>Subjective estimate:</p> <p>The level of management judgement over the estimation for certain inward reinsurance premiums written, specifically relating to proportional contracts, is an area of audit risk. This is primarily due to notification lags from cedants and brokers for such business, resulting in uncertainty in respect of the exact quantum of the ultimate premium resulting in the potential for adjustments to historic written premiums which have not yet been fully realised; this creates opportunities for overstating or understating the premium amount (or delaying downward adjustments) as the actual premium is likely to take some time to develop.</p> <p>Related to the above, the proportional treaty debtor is also an area of risk for the 2021 year end audit given the judgement involved in ensuring that the valuation of the debtor appropriately reflects the inherent uncertainty associated with the time lag between the initial booking and ultimate realisation.</p> <p>The effect of these matters is that, as part of our risk assessment, we determined that proportional treaty premiums and the associated debtor has a high degree of estimation uncertainty, with a potential range of reasonable outcomes greater than our materiality for the financial statements as a whole.</p>	<p>Our procedures included:</p> <p>Control design and operation</p> <p>We tested, assisted by our own IT specialists, the design and operation of the Company's controls in respect of data entry, monitoring of premium bookings and approval of changes for booking and adjusting the amounts of inwards reinsurance premiums relating to proportional contracts.</p> <p>In respect of proportional treaty debtors we performed the tests below rather than seeking to rely on any of the other of the company's controls because the nature of the balance is such that we would expect to obtain audit evidence primarily through the detailed procedures described.</p> <p>Substantive testing</p> <p><i>Sector experience</i></p> <p>We evaluated the appropriateness of the Company's methodology to determine the appropriate level of estimated premium by reference to our knowledge of the business and the industry with particular reference to premium pricing trends within the wider reinsurance market.</p> <p><i>Historical comparison</i></p> <p>We tested the historical accuracy of a sample of the premium bookings through comparison of prior year bookings to trends in confirmed premiums as evidence through confirmed treaty statements or other relevant corroborative evidence .</p> <p><i>Tests of detail</i></p> <p>We agreed the premiums booked for a sample of policies to counterparty notifications of premium and other external information and corroborated any material adjustments to previously held bookings.</p> <p>For a sample of proportional treaty debtors, we assessed the cash collection profiles including post year end settlements, where relevant, and evaluated the financial position of the</p>



	<p>counterparties by reference to their credit ratings and other publicly available information.</p> <p>Our result</p> <p>We found the amounts recognised in respect of elements of the Company's gross written premiums - inward reinsurance totalling \$0.9bn, relating to inwards reinsurance premiums on proportional contracts and debtors arising out of reinsurance operations totalling \$0.5bn relating to proportional treaty debtors to be acceptable (2020: acceptable).</p>
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Outward reinsurance premiums (2021: \$0.7bn, 2020: \$0.9bn) Refer to page 52 (accounting policy) and page 64-65 (financial disclosures)

The risk versus 2020: ◀▶

The risk	Our response
<p>Calculation error:</p> <p>Reinsurance contracts are often complex.</p> <p>In recent years the mix of the Company's outwards reinsurance program has changed with the inclusion of significant, multi-line quota share agreements and excess of loss contracts in the portfolio resulting in greater complexity being associated with this area.</p>	<p>Our procedures included:</p> <p>Control design and observation</p> <p>Evaluating and testing the design and implementation of key controls over the completeness and accuracy of outwards reinsurance premium.</p> <p>We performed the detailed tests below rather than seeking to rely on any of the company's controls because our knowledge of the design of these controls indicated that we would be unlikely to obtain the required evidence to support reliance on controls.</p> <p>Substantive testing</p> <p><i>Tests of details</i></p> <p>We inspected the contractual terms of a sample of excess of loss reinsurance agreements to check these have been accurately applied in deriving the relevant accounting entries.</p> <p>We agreed the attributes of the contracts relevant to the determination of the outward reinsurance premium for a sample of quota-share reinsurance agreements back to the contractual agreements. We also performed recalculations of the booked premiums based on these attributes.</p> <p>Our result</p> <p>We found the amounts recognised in respect of the Company's outward reinsurance premiums to be acceptable (2020: acceptable).</p>



Reinsurers' shares of claims outstanding (2021: \$2.7bn, 2020: \$2.8 bn)

Refer to page 52 (accounting policy) and page 75 (financial disclosures)

The risk versus 2020: ◀ ▶

The risk	Our response
<p>Subjective valuation:</p> <p>Valuation of outward reinsurance recoveries on claims reserve is an area of audit risk due to the considerable processing and recording of data, complexity and subjectivity inherent in the netting down process.</p> <p>The increased risk in the estimation of recoveries on claims outstanding is driven by the assumptions applied for net reserving across underwriting years and lines of business, particularly estimating the initial expected loss ratios on the most recent accident years.</p> <p>The effect of these matters is that, as part of our risk assessment, we determined that reinsurer's share of IBNR has a high degree of estimation uncertainty, with a potential range of reasonable outcomes greater than our materiality for the financial statements as a whole, and possibly many times that amount.</p>	<p>Our procedures included:</p> <p>Our actuarial expertise</p> <p>We used our own actuarial specialists to assist us in performing our procedures in this area.</p> <p>Controls design, observation and operation</p> <p>We evaluated the design and implementation of the Company's controls over the review of net reserving methodologies and assumptions applied.</p> <p>We further tested the design and implementation of the Company's manual controls such as the reconciliation of data used to source systems.</p> <p>Our testing identified weaknesses in the design and operation of controls over reinsurance recoveries on claims outstanding. As a result we expanded the extent of our detailed testing over and above that originally planned.</p> <p>Substantive testing</p> <p><i>Historical comparison</i></p> <p>We assessed the reasonableness of net and gross ultimate loss ratios and net-to-gross IBNR ratios on a whole book and class level by comparing to relevant historical company experience data taking into consideration any changes to the reinsurance programme.</p> <p><i>Tests of details</i></p> <p>For a sample of claims, we have tested the amounts booked as reinsurance recoveries by reference to the projected ultimates and contractual attributes determining the extent of the recovery, adjusted for the cash recoveries which we agreed to collection advices.</p> <p>Our result</p> <p>We found the valuation of reinsurers' shares of claims outstanding to be acceptable (2020: acceptable).</p>

3 Our application of materiality and an overview of the scope of our audit

Materiality for the financial statements as a whole was set at \$6.65m (2020: \$7.0m) determined with reference to a benchmark of gross written premium (of which it represents 0.5% (2020: 0.5%).

We continue to consider gross written premium to be the most appropriate benchmark due to its relative stability and correlation with business performance and size.

In line with our audit methodology, our procedures on individual account balances and disclosures were performed to a lower threshold, performance materiality, so as to reduce to an acceptable level the risk that individually immaterial misstatements in individual account balances add up to a material amount across the financial statements as a whole.

Performance materiality was set at 75% (2020: 75%) of materiality for the financial statements as a whole, which equates to \$5m (2020: \$5.25m) for the Company. We applied this percentage in our determination of performance materiality because we did not identify any factors indicating an elevated level of risk. In addition due to our assessment of specific increased risks we applied a lower performance materiality of 65% (2020: 65%) of materiality to claims paid and case reserves, which equates to \$4.32m (2020: \$4.55m). We applied this percentage in our determination of performance materiality for these balances based on the level of identified control deficiencies in respect of the processes relating to these balances



We agreed to report to the Audit Committee any corrected or uncorrected identified misstatements exceeding \$0.33m (2020: \$0.35m), in addition to other identified misstatements that warranted reporting on qualitative grounds.

Our audit of the Company was performed at the Company's head office in London, as well as the Bermuda and US office locations.

35TOur audit of the Company was undertaken to the materiality levels specified above.

The auditor of the parent company, Aspen Insurance Holdings Limited, performed testing on controls relating to outward reinsurance and tests of detail in relation to outwards reinsurance related balances in the financial statements. Audit team in Bermuda performed tests of detail relating to investments and investment income (including realised and unrealised gains/losses on investments). Audit team in the US performed tests of detail relating to income statement and balance sheet items in respect of underwriting processes (premiums and deferred acquisition costs), claims processes (claims paid, case reserves and change in claims outstanding), debtors, creditors, tax, cash, unearned premium reserve including the change in the unearned premium reserve, operating and administration expenses and journals for the business of the Company in the US. We instructed auditors in these locations as to the specific procedures required to be performed and the information to be reported back.

We evaluated the scope of the work and the information reported back to ensure that it addressed the risks relevant to our audit.

We were able to rely upon the Company's internal control over financial reporting in several areas of our audit, where our controls testing supported this approach, which enabled us to reduce the scope of our substantive audit work; in the other areas the scope of the audit work performed was fully substantive.

4 Going concern

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

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

- a deterioration in claims experience, potentially caused by market wide catastrophe event(s) or impacts of the COVID-19 pandemic; and
- a deterioration in the valuation of the Company's investments arising from a significant change in the economic environment.

We also considered less predictable but realistic second order impacts, such as the failure of counterparties who have transactions with the Company (such as reinsurers) to meet commitments that could give rise to a negative impact on the Company's financial position and the impact of COVID-19 on the economic environment and the resulting impact on the Company's available financial resources.



We considered whether these risks could plausibly affect the liquidity or solvency in the going concern period by assessing the degree of downside assumption that, individually and collectively, could result in a liquidity or solvency issue, taking into account the Company's current financial resources and capital headroom (a reverse stress test).

We also assessed the completeness of the going concern disclosure.

Our conclusions based on this work:

- we consider that the directors' use of the going concern basis of accounting in the preparation of the financial statements is appropriate;
- we have not identified, and concur with the directors' assessment that there is not, a material uncertainty related to events or conditions that, individually or collectively, may cast significant doubt on the Company's ability to continue as a going concern for the going concern period; and
- we found the going concern disclosure in note1 to be acceptable.

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

5 Fraud and breaches of laws and regulations – ability to detect

Identifying and responding to risks of material misstatement due to fraud

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

- Enquiring of directors, the audit committee, internal audit, the risk and compliance officers and inspection of policy documentation as to the Company's high-level policies and procedures to prevent and detect fraud, including the internal audit function, and the Company's channel for "whistleblowing", as well as whether they have knowledge of any actual, suspected or alleged fraud.
- Reading Board, audit committee and risk committee minutes.
- Considering remuneration incentive schemes
- Using analytical procedures to identify any unusual or unexpected relationships.
- Consulting our own professionals with forensic knowledge to assist us in identifying fraud risks based on discussions of the circumstances of the Company

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

As required by auditing standards, and taking into account possible pressures to meet profit targets and our overall knowledge of the control environment, we perform procedures to address the risk of management override of controls and the risk of fraudulent revenue recognition, in particular

- the risk that management may be in a position to make inappropriate accounting entries;
- the risk of bias in accounting estimates and judgements such as the valuation of insurance contract liabilities and associated recoveries, the estimation of premium income from proportional contracts and the valuation and presentation of the prior year adjustment.

We did not identify any additional fraud risks.



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

In order to address the risk of fraud specifically as it relates to the valuation of insurance contract liabilities, we performed procedures including:

- Involving our own actuarial specialists to assist in our challenge of management's selection of assumptions. This included evaluating the appropriateness of management's chosen methodologies and the assumptions adopted in respect of ultimate loss ratios (gross and net) by comparing to relevant historical company experience data, and comparing estimates of total catastrophe losses to expectations derived from our understanding of current trends in loss development, and industry benchmarking in order to identify specific trends and outliers.
- Using our own modelling tools to project ultimate losses for certain individual classes of business (based on our risk assessment) and comparing this to the Company's estimates; and
- In respect of case reserves, selected a sample of notified claims and agreed management's booked amounts to external loss notification information.

With respect to management's determination of estimated premium income from proportional contracts, we evaluated and tested the design and implementation of key controls in this area and assessed the potential for management bias in the respect of the determination of the estimated premium income, including consideration of how management have reflected estimation uncertainty by reference to historical outturn and commercial factors such as pricing trends.

With respect to the valuation and presentation of the prior year adjustment, we involved our Forensic specialists to assist with testing the accuracy and appropriateness of management information underlying the key assumptions and data used in the quantification of the prior year adjustment and evaluate the adequacy of the steps taken to investigate and quantify the associated amounts.

Further detail in respect of our procedures around the valuation of insurance contract liabilities and the estimated premium income from proportional contracts is set out in the key audit matter disclosures in section 2 of this report.

To address the pervasive risk as it relates to management override, we also performed procedures identifying journal entries to test based on risk criteria and comparing the identified entries to supporting documentation. These criteria included testing journals posted to IBNR after the date of the year end reserving committee meeting, any journals posted to the cash account balance with the other side of the journal posted to an unexpected/unusual account, journals posted by users who are not ordinarily expected to post journals such as senior management and infrequent posters, journals containing descriptions or words that might be indicative of unusual or inappropriate entries, and unexpected revenue journal transactions.

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

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

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

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



The potential effect of these laws and regulations on the financial statements varies considerably.

Firstly, the Company is subject to laws and regulations that directly affect the financial statements including financial reporting legislation (including related companies legislation), distributable profits legislation and corporation and other taxation legislation and we assessed the extent of compliance with these laws and regulations as part of our procedures on the related financial statement items.

Secondly, the Company is subject to many other laws and regulations where the consequences of non-compliance could have a material effect on amounts or disclosures in the financial statements, for instance through the imposition of fines or litigation or the loss of the Company's license to operate. We identified the following areas as those most likely to have such an effect: compliance with regulation relating to sanctions due to the nature of the business written by the Company and its customers, regulatory capital and liquidity and certain aspects of company legislation recognising the financial and regulated nature of the Company's activities and its legal form including those that apply to the Company's overseas branches. Auditing standards limit the required audit procedures to identify non-compliance with these laws and regulations to enquiry of the directors and other management and inspection of regulatory and legal correspondence, if any. Therefore if a breach of operational regulations is not disclosed to us or evident from relevant correspondence, an audit will not detect that breach. We discussed with the audit committee matters related to actual or suspected breaches of laws or regulations, for which disclosure is not necessary, and considered any implications for our audit.

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

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

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

6 We have nothing to report on the strategic report and the directors' report

The directors are responsible for the strategic report and the directors' report. Our opinion on the financial statements does not cover those reports and we do not express an audit opinion thereon.

Our responsibility is to read the strategic report and the directors' report and, in doing so, consider whether, based on our financial statements audit work, the information therein is materially misstated or inconsistent with the financial statements or our audit knowledge. Based solely on that work:

- we have not identified material misstatements in those reports;
- in our opinion the information given in the strategic report and the directors' report for the financial year is consistent with the financial statements; and
- in our opinion those reports have been prepared in accordance with the Companies Act 2006.

7 We have nothing to report on the other matters on which we are required to report by exception

Under the Companies Act 2006, we are required to report to you if, in our opinion:

- adequate accounting records have not been kept, or returns adequate for our audit have not been received from branches not visited by us; or
- the financial statements are not in agreement with the accounting records and returns; or
- certain disclosures of directors' remuneration specified by law are not made; or



- we have not received all the information and explanations we require for our audit.

We have nothing to report in these respects.

8 Respective responsibilities

Directors' responsibilities

As explained more fully in their statement set out on page 33, the directors are responsible for: the preparation of the financial statements including being satisfied that they give a true and fair view; such internal control as they determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error; assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern; and using the going concern basis of accounting unless they either intend to liquidate the Company or to cease operations, or have no realistic alternative but to do so.

Auditor's responsibilities

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 our opinion in an auditor's report. Reasonable assurance is a high level of assurance, but does not guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements.

A fuller description of our responsibilities is provided on the FRC's website at www.frc.org.uk/auditorsresponsibilities.

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

This report is made solely to the Company's members, as a body, in accordance with Chapter 3 of Part 16 of the Companies Act 2006. 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 auditor's 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.

Kushan Tikkoo

Kushan Tikkoo (Senior Statutory Auditor)
for and on behalf of KPMG LLP, Statutory Auditor
Chartered Accountants
15 Canada Square
Canary Wharf
London
E14 5GL
8 April 2022



INCOME STATEMENT: TECHNICAL ACCOUNT - GENERAL BUSINESS

For the Year Ended 31 December 2021

	<u>Notes</u>	2021 \$m	2020 As restated \$m
Gross premiums written	3	1,272.0	1,345.0
Outward reinsurance premiums		(749.1)	(944.1)
Net premiums written		522.9	400.9
Change in the provision for unearned premiums			
Gross amount	19	68.4	8.1
Reinsurers' share	19	(5.1)	31.3
Earned premiums net of reinsurance		586.2	440.3
Allocated investment return transferred from the non-technical account		(80.2)	114.0
Total technical income		506.0	554.3
Claims incurred net of reinsurance			
Claims paid			
Gross amount		(820.3)	(1,032.8)
Reinsurers' share		418.3	567.9
		(402.0)	(464.9)
Change in the provision for claims			
Gross amount	19	14.8	63.8
Reinsurers' share	19	2.0	158.0
Claims incurred net of reinsurance	4	(385.2)	(243.1)
Net operating expenses	6	(205.7)	(242.0)
Total claims and expenses		(590.9)	(485.1)
Balance on the technical account - general business		(84.9)	69.2

The results for the years ended 31 December 2021 and 2020 are derived from continuing operations.

The notes on pages 43 to 76 form an integral part of these financial statements.



INCOME STATEMENT: NON-TECHNICAL ACCOUNT

For the Year Ended 31 December 2021

	<u>Notes</u>	2021 \$m	2020 As restated \$m
Balance on technical account general business		(84.9)	69.2
Investment income	7	37.3	39.8
Realised (losses)/gains on investments	7	(1.7)	28.4
Unrealised (losses)/gains on investments	7	(114.0)	48.9
Investment expenses and charges	7	(1.8)	(3.1)
Allocated investment loss/(income) transferred to the general business technical account		80.2	(114.0)
Other income/(expense)	5	37.5	(57.3)
(Loss)/profit before tax		(47.4)	11.9
Tax charge on profit	10a	(1.3)	(10.8)
(Loss)/profit after tax for the financial year		(48.7)	1.1

The results for the years ended 31 December 2021 and 2020 are derived from continuing operations.

STATEMENT OF COMPREHENSIVE INCOME

	<u>Notes</u>	2021 \$m	2020 As restated \$m
(Loss)/profit for the financial year		(48.7)	1.1
Profit on foreign exchange translation	11	36.5	33.8
Total comprehensive loss/income for the year		(12.2)	34.9

The notes on pages 43 to 76 form an integral part of these financial statements.



STATEMENT OF CHANGES IN EQUITY

2021	Notes	Called up share capital \$m	Capital contribution reserve \$m	Profit and loss account \$m	Total \$m
Opening shareholders' equity	21	614.9	555.0	(294.1)	875.8
Capital contribution		—	100.0	—	100.0
Total comprehensive loss/income for the year		—	—	(12.2)	(12.2)
Closing shareholders' equity		614.9	655.0	(306.3)	963.6

The company received two cash capital contributions of \$50.0m in July 2021 from AEHL.

2020	Notes	Called up share capital \$m	Capital contribution reserve \$m	Profit and loss account As restated \$m	Total As restated \$m
Opening shareholders' equity	21	614.9	470.0	(329.0)	755.9
Capital contribution		—	85.0	—	85.0
Total comprehensive profit for the year		—	—	34.9	34.9
Closing shareholders' equity		614.9	555.0	(294.1)	875.8

On 22 December 2020 the Company received a cash capital contribution of \$85m from AEHL.

The profit and loss account reserve is the aggregate of both the retained earnings and the foreign currency translation reserve.

The notes on pages 43 to 76 form an integral part of these financial statements.



BALANCE SHEET - ASSETS

AS AT 31 DECEMBER 2021

	<u>Notes</u>	2021 \$m	2020 As restated \$m
ASSETS			
Investments			
Other financial investments	13	2,413.0	2,413.4
Deposits with ceding undertakings		<u>36.0</u>	<u>35.2</u>
		2,449.0	2,448.6
Reinsurers' share of technical provisions			
Provision for unearned premiums	19	153.7	143.8
Claims outstanding	19	<u>2,697.2</u>	<u>2,803.9</u>
		2,850.9	2,947.7
Debtors			
Debtors arising out of direct insurance operations -	14	70.6	48.7
Debtors arising out of reinsurance operations	14	503.9	597.1
Amounts due from fellow group undertakings	15	39.0	170.6
Other debtors	14	<u>22.1</u>	<u>15.0</u>
		635.6	831.4
Other assets			
Tangible fixed assets	12	0.5	0.5
Cash at bank and in hand		<u>115.3</u>	<u>109.3</u>
		115.8	109.8
Prepayments and accrued income			
Accrued interest and rent		9.7	9.1
Deferred acquisition costs	18	<u>117.1</u>	<u>139.0</u>
		126.8	148.1
TOTAL ASSETS		<u>6,178.1</u>	<u>6,485.6</u>

The notes on pages 43 to 76 form an integral part of these financial statements



BALANCE SHEET - LIABILITIES

AS AT 31 DECEMBER 2021

	<u>Notes</u>	2021 \$m	2020 As restated \$m
Equity and liabilities			
Capital and reserves			
Called up share capital	21	614.9	614.9
Capital contribution reserve	21	655.0	555.0
Profit and loss account		(306.3)	(294.1)
Shareholders' equity		<u>963.6</u>	<u>875.8</u>
Technical provisions			
Provision for unearned premiums	19	677.8	744.1
Claims outstanding	19	<u>3,780.3</u>	<u>3,843.6</u>
		<u>4,458.1</u>	<u>4,587.7</u>
Creditors			
Amounts due to fellow group undertakings	15	331.1	626.7
Other creditors	16	<u>389.1</u>	<u>357.5</u>
		<u>720.2</u>	<u>984.2</u>
Accruals and deferred income		<u>36.2</u>	<u>37.9</u>
Total liabilities		<u>5,214.5</u>	<u>5,609.8</u>
TOTAL EQUITY AND LIABILITIES		<u>6,178.1</u>	<u>6,485.6</u>

These financial statements were approved by the Board of Directors on 29 March 2022 and signed on its behalf:

Richard Milner
Director
8 April 2022



NOTES TO THE FINANCIAL STATEMENTS

For the year ended 31 December 2021

1. Accounting Policies

1.1 Statement of Compliance

Aspen Insurance UK Limited (the “Company”) is a company limited by shares and incorporated and domiciled in the UK. The Registered Office is 30 Fenchurch Street, London EC3M 3BD.

These financial statements were prepared in accordance with Financial Reporting Standard 102: the Financial Reporting Standard applicable in the UK and Republic of Ireland (“FRS 102”) and Financial Reporting Standard 103 (“FRS 103”), being applicable UK GAAP accounting standards and in accordance with Schedule 3 of the Large and Medium-sized Companies and Groups (Accounts and Reports) Regulations relating to insurance companies.

These financial statements are prepared under the historical cost convention except for certain financial instruments which are measured at fair value.

1.2 Basis of Preparation

The financial statements for the year ended 31 December 2021 were approved for issue by the Board of Directors on 29 March 2022. The Directors confirm that they are satisfied that the Company has adequate resources to continue in operation and meet its liabilities as they fall due for a period of at least 12 months from the date that these financial statements are approved. In arriving at this conclusion, the Directors have prepared a going concern assessment covering the same period. This assessment takes into account severe but plausible downside scenarios including the likely impact on the Company’s liquidity position of potential loss events which are notably more severe than anything in the Company’s recent experience. This is supplemented with sensitivities in respect of adverse movements in interest rates and credit spreads impacting the investment portfolio. The Directors have also considered the ongoing impact of COVID-19 on the Company’s financial resources and the extent of the capital surplus held over the minimum regulatory capital requirement. The analysis performed indicates that the Company remains solvent and retains sufficient liquidity and headroom above the minimum regulatory capital requirements even under the severe downside scenarios.

Accordingly, the Directors continue to adopt the going concern basis in preparing the financial statements.

The presentation currency of these financial statements is US dollars. Given the Company has annual gross written premium of more than \$1 billion and net assets of over \$900 million the Company considers it appropriate to present all amounts in the financial statements to the nearest \$0.1m.

The Company’s parent undertaking, AIHL includes the Company in its consolidated financial statements. The consolidated financial statements of AIHL are prepared in accordance with US GAAP, available to the public and may be obtained from 141 Front Street, Hamilton, Bermuda. In these financial statements, the Company is considered to be a qualifying entity (for the purposes of this FRS) and has applied the exemptions available under FRS 102 in respect of the following disclosures:

- Reconciliation of the number of shares outstanding from the beginning to end of the period;
- Cash Flow Statement and related notes;
- Requirements of Related Party Disclosures;
- Key Management Personnel compensation; and
- Certain disclosures required by FRS 102.26 Share Based Payments.

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



The preparation of the financial statements requires management to make judgements, estimates and assumptions that affect the amounts reported for assets and liabilities as at the balance sheet date and the amounts reported for revenues and expenses during the year. However, the nature of estimation means that actual outcomes could differ from those estimates. The following are the Company's key sources of estimation uncertainty and judgment:

Insurance and reinsurance contract technical provisions

For insurance and reinsurance contracts estimates have to be made both for the expected ultimate cost of claims reported at the reporting date and for the expected ultimate cost of claims incurred but not yet reported ("IBNR"), at the reporting date for both gross and net of reinsurance recoveries. It can take a significant period of time before the ultimate claims cost can be established with certainty and for some types of policies IBNR claims form the majority of the liability in the Balance Sheet. The estimation of IBNR is discussed further under section 1.3.1 - Insurance Contracts.

Provision for unearned premiums and deferred acquisition costs

For (re)insurance contracts management use their judgement in selecting appropriate earnings patterns for the business underwritten and associated acquisition costs, in particular for contracts where the pattern of loss emergence is likely to be markedly uneven. Patterns are calculated (determined) with reference to the inception and expiry dates of the policies concerned and the likely pattern of loss emergence using the same underlying considerations that apply to the technical provisions, taking into consideration information provided by cedants on loss emergence where appropriate.

Estimates of future premiums

For certain (re)insurance contracts premium is initially written based on estimates of ultimate premiums receivable. Estimates are derived from underwriter experience, historical data and use of broker notifications. These estimates are judgemental and could result in adjustments in subsequent periods to revenue recorded in the financial statements. The assumptions used to project future premium development include past premium development, policy mix and pricing trends.

Taxation

The Company establishes provisions based on reasonable estimates. The amount of such provisions is based on various factors, such as experience with previous tax audits and differing interpretations of tax regulations by tax authorities.

Management estimation is required to determine the amount of deferred tax assets that can be recognised, based upon likely timing and level of future taxable profits together with an assessment of the effect of future tax planning strategies.

1.3 Significant Accounting Policies

1.3.1 Insurance contracts

Gross Premiums

Gross written premiums comprise total premiums receivable for the whole period of cover entered into in the reporting period plus any adjustments to such premiums receivable in respect of business written in prior reporting periods. All premiums are shown gross of commissions payable to intermediaries and exclusive of taxes and levies.

Reinsurance Premiums

Reinsurance premiums relating to reinsurance placed by the Company are accounted for using the same accounting methodology used for inwards premiums.



Acquisition Costs

Acquisition costs represent commission brokerage, profit commission and other variable costs that relate directly to the securing of new contracts and renewal of existing contracts. They are generally deferred over the period in which the related premiums are earned.

Claims

Claims include all claims occurring during the year, whether reported or not, related internal and external claims handling costs that are directly related to the processing and settlement of claims, a reduction for the value of salvage and other recoveries, and any adjustments to claims outstanding from previous years.

(Re)insurance claims are recognised when the related gross (re)insurance claim is recognised according to the terms of the relevant contract.

Technical Provisions

Technical provisions comprise claims outstanding, provisions for unearned premiums, and provisions for unexpired risk.

Claims provision

The outstanding claims provision is based on the estimated ultimate cost of all claims incurred but not settled at the reporting date, whether reported or not, together with related claims handling costs and a reduction for the expected value of salvage and other recoveries. Delays can be experienced in the notification and settlement of certain types of claims, therefore the ultimate cost of these cannot be known with certainty at the reporting date. The Company takes all reasonable steps to ensure that it has appropriate information regarding its claims exposure. However, given the uncertainty in establishing claims provisions, it is likely that the final outcome will prove to be different from the original liability established. The liability is not discounted for the time value of money.

For (re)insurance contracts, estimates have to be made both for the expected ultimate cost of claims reported at the reporting date and for the expected ultimate cost of claims incurred, but not yet reported to the Company, at the reporting date. The estimation of 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. Claims IBNR may often not be apparent to the insured until many years after the event giving rise to the claims has happened. Classes of business where the IBNR proportion of the total reserve is high will typically display greater variations between initial estimates and final outcomes because of the greater degree of uncertainty of estimating these reserves. Classes of business where claims are typically reported relatively quickly after the claim event tend to display lower levels of volatility. 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 assume 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.

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

Where possible the Company adopts multiple techniques 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 class and the extent of the development of each accident year. The main projection methodologies that are used are:

- Initial expected loss ratio (“IELR”) method: this method calculates an estimate of ultimate losses by applying an estimated loss ratio to an estimate of ultimate earned premium for each accident year.
- Bornhuetter-Ferguson (“BF”) method: the BF method uses as a starting point an assumed IELR and blends in the loss ratio implied by the claims experience to date by using benchmark loss development patterns on paid claims data (“Paid BF”) or reported claims data (“Reported BF”).
- Loss development (“Chain Ladder”): this method uses actual loss data and the historical development profiles on older accident years to project more recent, less developed years to their ultimate position.
- Exposure-based method: this method is used for specific large typically catastrophic events such as a major hurricane. All exposure is identified and the Company works with known market information and information from the Company’s cedants to determine a percentage of the exposure to be taken as the ultimate loss.

In addition to these methodologies, the Company’s actuaries may use other approaches depending upon the characteristics of the line of business and available data.

Provisions for unearned premiums

Unearned premiums are those proportions of premiums written in a year that relate to periods of risk after the reporting date, and are computed separately for each (re)insurance contract. Written premiums are recognised as earned over the period of the policy on a time apportionment basis having regard where appropriate, to the incidence of risk. The proportion attributable to subsequent periods is deferred as a provision for unearned premiums.

Unearned insurance premiums are those proportions of premiums written in a year that relate to periods of risk after the reporting date. Unearned reinsurance premiums are deferred over the term of the underlying direct insurance policies for risks-attaching contracts and over the term of the reinsurance contract for losses-occurring contracts.

Unearned premiums are deemed monetary items and non-US dollar amounts are valued using the closing exchange rate.

Unexpired risks

A liability adequacy provision (the unexpired risks provision) is made where the cost of claims and expenses arising after the end of the financial year from contracts concluded before that date, is expected to exceed the provision for unearned premiums, net of deferred acquisition costs, and premiums receivable.

The assessment of whether a provision is necessary is made by considering separately each category of business on the basis of information available at the reporting date, after offsetting surpluses and deficits arising on products which are managed together. Investment income is taken into account in calculating the provision.

Deferred acquisition costs

Acquisition costs arising from the conclusion of (re)insurance contracts are deferred commensurate with the unearned premium provision. Deferred acquisition costs are deemed to be monetary items and non-US dollar amounts are valued using the closing exchange rate.

Reinsurance assets

The Company cedes (re)insurance risk in the normal course of business for all of its businesses. Reinsurance assets represent balances due from reinsurance companies. Amounts recoverable from reinsurers are estimated in a manner consistent with the outstanding claims provision or settled claims associated with the reinsurer’s policies and are in accordance with the related reinsurance contract.



Reinsurance assets are reviewed for impairment at each reporting date, or more frequently, when an indication of impairment arises during the reporting year. Impairment occurs when there is objective evidence as a result of an event that occurred after initial recognition of the reinsurance asset that the Company may not receive all outstanding amounts due under the terms of the contract and the event has a reliably measurable impact on the amounts that the Company will receive from the reinsurer. Any impairment loss is recorded in the Income Statement.

(Re)insurance receivables

(Re)/insurance receivables are recognised when due and measured on initial recognition at the fair value of the consideration received or receivable. The carrying value of (re)insurance receivables is reviewed for impairment whenever events or circumstances indicate that the carrying amount may not be recoverable, with the impairment loss recorded in the income statement.

(Re)insurance payables

(Re)/insurance payables are recognised when due and measured on initial recognition at the fair value of the consideration received less directly attributable transaction costs. (Re)insurance payables are derecognised when the obligation under the liability is settled, cancelled or expired.

1.3.2 Financial Instruments

As permitted by FRS 102, the Company has elected to apply the recognition and measurement provisions of IAS 39 Financial Instruments to account for all of its financial instruments.

The Company classifies its financial assets into the following categories: debt securities and other fixed income securities, short term investments, and derivative assets held at fair value through profit and loss. Management determines the classification of its investments at initial recognition and re-evaluates this at every reporting date.

Financial assets at fair value through profit or loss

A financial asset is classified into this category if it is acquired principally for the purpose of selling in the short term, if it forms part of a portfolio of financial assets in which there is evidence of short term profit-taking, or if so designated by management to minimise any measurement or recognition inconsistency with associated liabilities.

Financial assets designated as at "fair value through profit and loss" at inception are those that are managed and whose performance is evaluated on a fair value basis. Information about these financial assets is provided internally on a fair value basis to the Company's key management personnel. The Company's investment strategy is to invest in listed and unlisted fixed interest rate debt securities, designated upon initial recognition at fair value through profit or loss.

The fair values of financial instruments traded in active markets are based on quoted bid prices at the balance sheet date. A market is regarded as active if quoted prices are readily and regularly available from an exchange, dealer, broker, industry group, pricing service, or regulatory agency, and those prices represent actual and regularly occurring market transactions on an arm's length basis.

The fair values of financial instruments that are not traded in an active market, are established by the Directors using valuation techniques which seek to arrive at the price at which an orderly transaction would take place between market participants.

Net gains or losses arising from changes in the fair value of financial assets at fair value through profit or loss are presented in the Income Statement within 'unrealised gains on investments' or 'unrealised losses on investments' in the period in which they arise.



Loans and receivables

Loans and receivables are non-derivative financial assets with fixed or determinable payments that are not quoted in an active market other than those that the Company intends to sell in the short term or that it has designated as at fair value through profit or loss. When a financial asset is recognised initially it is measured at fair value plus transaction costs that are directly attributable to the acquisition or issue of the financial asset. Loans and receivables are subsequently measured at amortised cost using the effective interest method. Receivables arising from (re)insurance contracts are also classified in this category and are reviewed for impairment as part of the impairment review of loans and receivables. This basis of valuation is viewed by the Directors as having prudent regard to the likely realisable value.

Impairment of financial assets

For financial assets not carried at fair value through profit or loss, the Company assesses at each balance sheet date whether there is objective evidence that a financial asset or group of financial assets is impaired. A financial asset or group of financial assets is impaired and impairment losses are incurred only if there is objective evidence of impairment as a result of one or more events that have occurred after the initial recognition of the asset (a 'loss event') and that loss event (or events) has an impact on the estimated future cash flows of the financial asset or group of financial assets that can be reliably estimated. Objective evidence that a financial asset or group of assets is impaired includes observable data that comes to the attention of the Company about the following events:

- significant financial difficulty of the issuer or debtor;
- a breach of contract, such as a default or delinquency in payments;
- the lender, for economic or legal reasons relating to the borrower's financial difficulty, granting to the borrower a concession that the lender would not otherwise consider;
- it becoming probable that the issuer or debtor will enter bankruptcy or other financial reorganisation;
- the disappearance of an active market for that financial asset because of financial difficulties; or
- observable data indicating that there is a measurable decrease in the estimated future cash flow from a group of financial assets since the initial recognition of those assets, although the decrease cannot yet be identified with the individual financial assets in the group, including:
 - adverse changes in the payment status of issuers or debtors in the group; or
 - national or local economic conditions that correlate with defaults on the assets in the group.

If there is objective evidence that an impairment loss has been incurred on loans and receivables or held-to-maturity investments carried at amortised cost, the amount of the loss is measured as the difference between the asset's carrying amount and the present value of estimated future cash flows (excluding future credit losses that have been incurred) discounted at the financial asset's original effective interest rate. The carrying amount of the asset is reduced and the amount of the loss is recognised in the profit and loss account for the period. If a held-to-maturity investment or a loan has a variable interest rate, the discount rate for measuring any impairment loss is the current effective interest rate determined under contract. As a practical expedient, the Company may measure impairment on the basis of an instrument's fair value using an observable market price.

Financial liabilities

Other financial liabilities relate to derivatives which are designated at fair value through profit and loss, and classified in accruals and deferred income. Creditors are also financial liabilities and are recognised initially at fair value, net of directly attributable transaction costs. Creditors are subsequently stated at amortised cost, using the effective interest rate method. For short term creditors (due within one year), no discounting is applied.

Financial liabilities are derecognised only when the obligation specified in the contract is discharged, cancelled or expires.



Investment return

Investment return comprises all investment income (which includes the interest income for financial assets carried at amortised cost, using the effective interest method), realised investment gains and losses, and movements in unrealised gains and losses, net of investment expenses, charges and interest payable on financial liabilities carried at amortised cost, using the effective interest method.

Dividends are recognised when the investments to which they relate are declared 'ex-dividend' and include the imputed tax. Interest income is recognised on a time proportionate basis taking into account the effective interest method. Interest income, interest payable, and dividend income are recognised in the Income Statement.

Realised gains and losses on investments carried at fair value through profit and loss are calculated as the difference between net sales proceeds and purchase price. In the case of investments included at amortised cost, realised gains and losses are calculated as the difference between sale proceeds and their latest carrying value. Movements in unrealised gains and losses on investments represent the difference between the fair value at the balance sheet date and their purchase price or their fair value at the last balance sheet date, together with the reversal of unrealised gains and losses recognised in earlier accounting periods in respect of investment disposals in the current period.

An allocation of actual investment return on investments supporting the general (re)insurance technical provisions and associated equity is made from the non-technical account to the technical account.

Offsetting of financial instruments

Financial assets and financial liabilities are offset and the net amount is reported in the Balance Sheet if, and only if:

- there is a currently enforceable legal right to offset the recognised amounts; and
- there is an intention to settle on a net basis, to realise the assets and settle the liabilities simultaneously.

1.3.3 Foreign currency

Items included in the financial statements are measured using the currency of the primary economic environment in which the operating branch operates:

- The US dollar is the functional currency and presentational currency of the Company; and
- The Company also operates through a number of discrete overseas branches in Switzerland, Australia, Singapore and Canada that have separate functional currencies.

Transactions in foreign currencies are translated to the functional currency of the operating segment at the foreign exchange rate ruling at the date of the transaction. Monetary assets and liabilities (which include unearned premiums and deferred acquisition costs) denominated in foreign currencies at the balance sheet date are retranslated to the functional currency of the operating segment at the foreign exchange rate ruling at that date. Non-monetary assets and liabilities that are measured in terms of historical cost in a foreign currency are translated using the exchange rate at the date of the transaction. Foreign exchange differences arising on translation are recognised in the non-technical Income Statement.

Foreign operations

The results and financial position of the overseas branches are translated from functional currency into the presentational currency of US dollars as follows:

- assets and liabilities are translated at the closing exchange rate at the balance sheet date;
- income and expenses are translated at the average rate of exchange during the year; and
- all resulting exchange differences are recognised in the Statement of Comprehensive Income and accumulated in equity.



1.3.4 Tangible fixed assets

Tangible fixed assets are stated at cost less accumulated depreciation and accumulated impairment losses. The Company assesses at each reporting date whether tangible fixed assets are impaired. Depreciation is charged to the Income Statement at rates calculated to write off the cost less the estimated residual value of tangible fixed assets by equal instalments over their estimated useful economic lives as follows:

- | | |
|--|---|
| • Office and Other Equipment | 25% per annum |
| • Hardware and Software ⁽¹⁾ | 33.3% per annum |
| • Underwriting Platform, Subscribe | 20% per annum |
| • Leasehold Improvements | Lesser of 15 years or remaining life of lease |

⁽¹⁾ Depreciation for software commences on the date that the software is brought into use.

Depreciation methods, useful lives and residual values are reviewed if there is an indication of a significant change since last annual reporting date in the pattern by which the Company expects to consume an asset's future economic benefits.

1.3.5 Operating leases

Payments (excluding costs for services and insurance) made under operating leases are recognised in the Income Statement on a straight-line basis over the term of the lease unless the payments to the lessor are structured to increase in line with expected general inflation, in which case the payments related to the structured increases are recognised as incurred. Lease incentives received are recognised in profit and loss over the term of the lease on a straight line basis.

1.3.6 Dividends

Dividends on ordinary shares are recognised as a liability and deducted from equity when they are approved by the Board. Interim dividends are deducted from equity when they are paid.

1.3.7 Taxation

Tax on the profit or loss for the year comprises current and deferred tax. Tax is recognised in the Income Statement except to the extent that it relates to items recognised directly in equity or other comprehensive income, in which case it is recognised directly in equity or other comprehensive income.

Current tax is the expected tax payable or receivable on the taxable income or loss for the year, using tax rates enacted or substantively enacted at the balance sheet date, and any adjustment to tax payable in respect of previous years.

Deferred tax is provided on timing differences which arise from the inclusion of income and expenses in tax assessments in periods different from those in which they are recognised in the financial statements.

Deferred tax is measured at the tax rate that is expected to apply to the reversal of the related difference, using tax rates enacted or substantively enacted at the balance sheet date. Deferred tax balances are not discounted.

Unrelieved tax losses and other deferred tax assets are recognised only to the extent that it is probable that they will be recovered against the reversal of deferred tax liabilities or other future taxable profits.

1.4 Provisions

A provision is recognised in the Balance Sheet when the Company has a present legal or constructive obligation as a result of a past event, that can be reliably measured and it is probable that an outflow of economic benefits will be required to settle the obligation. Provisions are recognised at the best estimate of the amount required to settle the obligation at the reporting date.



2. Risk and Capital Management

The Company is exposed to a range of financial risks through its financial assets, financial liabilities, reinsurance assets and policyholder liabilities. In particular, the key financial risk is that the proceeds from financial assets are not sufficient to fund the obligations arising from insurance policies as they fall due. The most important components of this financial risk are insurance risk, market risk (including interest rate risk and currency risk) credit risk, and liquidity risk.

The key risks for the Company are as set out in the Principal Risks and Uncertainties section within the Strategic Report.

(a) Risk Governance and Risk Management Strategy

The Board of Directors of the Company (“the Board”) considers effective identification, measurement, monitoring, management and reporting of the risks facing the business to be key elements of its responsibilities. The Board ensures that the Company operates an effective risk management and control framework which includes risk management, compliance, and internal control systems. The Board uses a Risk sub-committee to support the oversight of the Company’s risk management processes.

The Company, as an operating entity within the Aspen Group, benefits from the Group’s established risk management practices. The Group’s risk management policies are established to identify and analyse the risks faced by the Group and the Company, to set appropriate risk limits and controls, and to monitor risks and adherence to limits. Risk management policies and systems are reviewed regularly to reflect changes in market conditions and the Company’s activities. Further details on the Group wide risk management strategy can be found in the consolidated financial statements of AIHL which are available to the public.

(b) Capital Management Objective, Policies and Approach

The Company’s capital management approach and policy is set out within its risk appetite statement which is summarised in the Risk Appetite section within the Strategic Report.

(c) Insurance Risk

Insurance risk is defined as the risk that underwriting results vary from their expected amounts, including the risk that reserves established in respect of prior periods are understated. Insurance risk includes the following:

- (a) Underwriting risk: The variation of accident year technical result from its expected value. Underwriting risk can be further split into sub-categories including:
 - Catastrophe accumulation risk: The risk that losses from natural catastrophes exceed expected levels;
 - Pricing calibration risk: the risk that actual technical results differ from expected values as a result of invalid assumptions, methodology, or parameters used in the pricing process;
 - Large claims risk: the risk that losses from a single man-made event, or group of related events, exceed the expected levels;
 - Attritional risk: the risk that the total of all losses other than catastrophe and large losses exceeds the expected level; and
 - Reinsurance mitigation risk: the risk that gross losses are not reduced by reinsurance recoveries to the extent expected.
- (b) Reserving risk: the variation in policyholder reserves for prior accident years.



Processes for addressing and monitoring risk

AIUK models' exposure to underwriting and reserving risks using its Internal Model to measure the associated capital requirements on the Solvency II SCR regulatory basis. The Model measures the capital required to write one year's business over the next 12 months. Modelling of insurance risk exposure is the key process for monitoring and managing insurance risk.

The Reserving Policy and Aspen Group Underwriting Risk Policy evidence how Aspen manages the risk of loss or of adverse change in the values of insurance and reinsurance liabilities, resulting from inadequate pricing and provisioning assumptions.

The Underwriting Risk Policy requires and defines the use of Aspen Underwriting Principles ("AUPS") or Underwriting Guidelines for each underwriting team, and similarly the Group Pricing Standard, establishes the Underwriting Guidelines set out a series of key principles translated into specific guidelines, requirements, processes and management controls, the compliance of which is mandatory for all underwriters. The PPD set out a series of standards and principles to apply to all business underwritten.

The Group Claims Risk Policy sets out the core risk management requirements for the claims process. The UK Platform Claims Procedures apply to claims handling in respect of AIUK claims. It covers the full claims cycle and is supported by a range of detailed procedures. It includes specific considerations in respect of the handling of AIUK claims.

The Reinsurance Policy defines Aspen's approach to managing the risk that gross losses are not reduced by reinsurance recoveries to the extent expected. The Insurance Risk policy defines Aspen's approach to management of material risk concentrations by categorising those risks, setting tolerances and limit, measuring, monitoring, reporting and escalating Natural Catastrophe and Non-Natural catastrophe accumulations.

The Key Risk limits are monitored and reported in the UK Chief Risk Officer's report to the AIUK Risk Committee.

Material Risk Concentrations

AIUK has limited its exposure to material risk concentrations by imposing maximum claim amounts on certain contracts as well as the use of reinsurance arrangements in order to limit exposures so they are managed within key risk limits. The material risk concentrations managed via Key Risk limits include natural catastrophe risks (such as hurricanes, earthquakes and flood damage) and man-made catastrophic events (such as acts of war, acts of terrorism and losses resulting from political instability). The effectiveness of these risk mitigation techniques is assessed through continual monitoring of the underlying risk profile and escalation of deviations from plan.



Sensitivity of insurance risk

The liabilities established could be significantly lower or higher than the ultimate cost of settling the claims arising. This level of uncertainty varies between the classes of business and the nature of the risk being written and can arise from developments in case reserving for large losses and catastrophes, or from changes in estimates of claims incurred but not reported. A 5% increase or decrease in total claims liabilities would have the following effect on profit or loss:

	Year ended 31 December			
	2021		2020	
	\$m		\$m	
	5% Increase	5% Decrease	5% Increase	5% Decrease
Total	<u>(54.1)</u>	<u>54.1</u>	<u>(54.5)</u>	<u>54.5</u>

Claims development table

Reserves are required owing to the time between the occurrences, reporting and eventual settlement of a loss, which, for some lines of business, can be several years. Since reserves are an estimate of the likely outcome of these future events, they are subject to a degree of volatility. That is, the actual emergence of ultimate losses can be expected to differ, perhaps materially, from any estimate of such losses. The users should be aware that loss payment and loss reporting patterns are not the only considerations in establishing loss reserves.

In setting claims provisions the Company gives consideration to the probability and magnitude of future experience being more adverse than assumed and exercises a degree of caution in setting reserves where there is considerable uncertainty. In general, the uncertainty associated with the ultimate claims experience in an accident year is greatest when the accident year is at an early stage of development and the margin necessary to provide the necessary confidence in the provisions adequacy is relatively at its highest. As claims develop, and the ultimate cost of claims becomes more certain, the relative level of margin maintained should decrease. The following tables show an analysis of incurred claims and allocated loss adjustment expenses and net of reinsurance as at 31 December 2021, 2020, 2019, 2018, 2017, 2016, 2015, 2014, 2013, and 2012. The loss development triangles are derived from all business written by the Company, as although a limited number of contracts are written which have durations of greater than one year the contracts do not meet the definition of a long duration contract.



Gross insurance contract claims incurred as at 31 December 2021:

Accident year	Before 2012	2012 \$m	2013 \$m	2014 \$m	2015 \$m	2016 \$m	2017 \$m	2018 \$m	2019 \$m	2020 \$m	2021 \$m
Estimate of cumulative claims incurred											
At end of accident year		806.2	851.6	784.5	883.2	884.3	1,225.8	1,075.9	901.0	863.2	833.4
One year later		912.7	849.5	803.9	834.4	1,148.3	1,252.4	1,190.9	1,128.9	865.9	
Two years later		940.2	845.6	798.5	816.0	1,156.7	1,307.1	1,193.7	1,102.6		
Three years later		941.6	818.4	764.2	774.2	1,133.9	1,293.3	1,198.8			
Four years later		958.3	764.2	759.3	824.1	1,157.8	1,269.0				
Five years later		940.8	759.9	777.0	815.4	1,159.2					
Six years later		939.6	772.9	763.9	820.6						
Seven years later		917.5	759.2	758.9							
Eight years later		923.9	755.2								
Nine years later		916.4									
Current estimate of cumulative claims incurred	7,117.3	916.4	755.2	758.9	820.6	1,159.2	1,269.0	1,198.8	1,102.6	865.9	833.4

Net insurance contract claims incurred as at 31 December 2021:

Accident year	Before 2012	2012 \$m	2013 \$m	2014 \$m	2015 \$m	2016 \$m	2017 \$m	2018 \$m	2019 \$m	2020 \$m	2021 \$m
Estimate of cumulative claims incurred											
At end of accident year		326.0	334.7	350.3	374.4	306.5	399.7	472.4	534.2	373.9	462.3
One year later		379.3	377.1	344.6	307.3	511.5	455.6	577.6	574.8	362.8	
Two years later		416.8	365.8	305.7	292.6	532.3	424.9	543.5	520.2		
Three years later		412.7	367.3	299.8	242.9	532.7	421.7	548.5			
Four years later		424.3	324.4	292.2	270.9	492.1	425.9				
Five years later		436.1	305.6	274.2	257.7	513.7					
Six years later		419.9	299.1	258.7	242.3						
Seven years later		382.6	270.8	259.9							
Eight years later		383.3	282.4								
Nine years later		395.0									
Current estimate of cumulative claims incurred	3,827.8	395.0	282.4	259.9	242.3	513.7	425.9	548.5	520.2	362.8	462.3

The reduction in net claims incurred in the 2019 Accident Year to \$521.9m includes the recovery of \$20.4m under the ADC contract.



(d) Market Risk

Market risk is defined as the risk of variation in the income generated by, and the fair value of, AIUK's investment portfolio, cash and cash equivalents, and derivative contracts, including the effect of changes in foreign currency exchange rates.

Within the Company's Risk Universe six categories of market risk are defined:

1. Foreign currency risk: the risk of adverse variation in the US dollar value of net assets in foreign currencies as a result of currency rate movements.
2. Fixed income security risk: the risk of variation in the market value of fixed income securities or derivatives. Fixed income security risk can be further split into sub-categories including:

Interest rate risk: the risk of variation in the market value of fixed income securities as a result of changes in prevailing interest rates. The Company classifies reinvestment risk as the risk of lower yields on the reinvestment of the proceeds from coupons payments, maturities and prepayments, which is a sub-category of interest rate risk.

Spread risk (including default risk): the yield of a non-government fixed income security can be divided into two parts:

- (i) The 'risk free' rate, being the yield of the treasury security issued by the country in which the issuer operates which is closest to it in maturity; and
- (ii) The 'spread' of the yield over the risk free rate (= total yield - risk free rate).

The spread is normally positive because it represents the extra consideration required by the market to compensate for the greater risk (compared to the Government issuer) of default on interest or redemption. The spread may also be influenced by the actual or perceived liquidity or marketability of the security.

The spread of a bond also adjusts over time to reflect the spread required on similar new issues. This movement up or down in spread therefore also contributes to overall market risk and AIUK calls this 'spread risk'. AIUK also includes within spread risk the risk that a security falls in value as a result of being downgraded by a rating agency as this will also cause the spread to increase. The risk of actual default on interest or redemption as a special case of spread risk is also included. This default risk is actually a type of credit risk but it is appropriate to deal with it here under market risk because of the way it is modelled in the Internal Model as an extreme case of downgrade risk.

Spread risk is managed by limiting the overall credit quality of the investment portfolio and the concentrations of investments with specific issuers of investments. This risk is mitigated by limiting exposure to any single counterparty.

3. Equity risk: AIUK defines equity risk as the risk of adverse movements in the market price of investments (or their derivatives) other than fixed income securities. Unlike Fixed Income Securities the value of equities is not directly linked to interest rates and spreads, there are many factors that affect the value of investments. The Company does not invest in equities so this risk is not currently relevant to the Company.



4. Market risk mitigation risk: the risk of variation in the value or effectiveness of hedging positions.
5. Asset concentration risk: the aggregate value of AIUK's investment portfolio may be at greater risk if it is overexposed to the same asset or a group of similar assets with similar risk dynamics. Concentrations which AIUK seek to manage include types of asset (e.g. mortgage backed securities), economic sector of issuer, and securities of the same issuer.
6. Valuation risk: some assets within AIUK's investment portfolio can be "private assets" for which there are no readily available market prices. There is a risk that the approaches used to value these "private assets" result in incorrect current values. As at 31 December 2021 AIUK did not have any investments in "private assets".

Processes for addressing and monitoring risk

As with Insurance risk, Aspen model exposure to market risk using the Internal Model to measure the associated capital requirements on both an internal basis and the Solvency II SCR regulatory basis. Modelling market risk exposures is a key process for monitoring and managing market risk.

The Group Investment Policy describes the investment strategy in the context of the annual business plan, asset allocation, and concentration limits at group and AIUK levels.

The Financial Risk Policy describes the measurement of market risks, and specifically describes what is permissible with regards to the use of derivatives in order to manage currency positions, portfolio duration and interest rate risk in the investment portfolio.

Use of derivatives is limited to interest rate swaps, forward rate transactions, bond options, interest rate futures, foreign exchange spot and forward transactions, and currency options. During 2021, AIUK only entered into foreign exchange forward transactions and has no off balance sheet exposures.

The Asset and Liability Management Policy defines Aspen's approach to duration and currency matching. Management monitors the value, currency and duration of cash and investments held by AIUK to ensure that it is able to meet the insurance and other liabilities as they become due. The following components of both cash matching and duration matching are employed to manage the investment portfolio:

- the average duration of liabilities
- the outlook for interest rates and the yield curve
- the need for cash to pay claims and
- total return

Material Risk Concentrations

As with Insurance Risks as well as modelling exposures and the capital required to address potential market risks using the Internal Model, AIUK has also limited its exposure to material risk concentrations through the use of Key Risk Limits. These material risk concentrations include foreign currency risk, interest rate risk and equity risk.

Key Risk limits regarding asset allocation, overall credit rating and the volatility of AIUK's investment portfolio have been defined by management and approved by the Board. In order that AIUK can manage its currency risks within the regulatory parameters required, a Key Risk Limit approved by the Board limits the mismatch between assets and liabilities where there are material positions in currencies other than the functional currency of AIUK. The effectiveness of risk mitigation techniques is assessed through continual monitoring of the underlying risk profile and escalation of any deviations from plan.



Sensitivity analysis

Foreign currency risk

As at 31 December 2021, if the US Dollar had weakened / strengthened by 10% with all other variables held constant the loss for the year would have been \$16.3m (2020: \$31.0m) higher / lower, mainly as a result of foreign exchange gains / losses on the translation of non US Dollar denominated financial assets, and foreign exchange losses / gains on translation of non US Dollar denominated insurance liabilities.

Interest rate risk

The table below depicts interest rate change scenarios and the effect on profit or loss from AIUK's interest rate sensitive invested assets based on movements of 100 and 200 basis points:

Movement in basis points	-200	-100	100	200
31 December 2021				
Fixed income portfolio effect - gain/(loss) (\$m)	164.6	82.3	(82.3)	(164.7)
31 December 2020				
Fixed income portfolio effect - gain/(loss) (\$m)	121.6	60.8	(60.8)	(121.6)

Spread risk

As part of spread risk AIUK include the risk that a security falls in value as a result of being downgraded by a rating agency as this will also cause the spread to increase. AIUK includes the risk of actual default on interest or redemption as a special case of spread risk. Whilst this default risk is actually a type of credit risk it is convenient to deal with it within market risk because of the way AIUK model it in the Internal Model as an extreme case of downgrade risk.

The table below depicts spread change scenarios and the effect on profit or loss from AIUK's spread sensitive invested assets:

Corporate bond spreads	-50	+50	+100	+200
31 December 2021				
Fixed income portfolio effect - gain/(loss) (\$m)	19.8	(19.8)	(39.6)	(79.1)
31 December 2020				
Fixed income portfolio effect - gain/(loss) (\$m)	15.2	(15.2)	(30.4)	(60.7)

(e) Credit risk

Credit risk is the risk of loss to AIUK if the counterparty to a financial instrument or reinsurance agreement fails to meet its contractual obligations. AIUK is exposed to credit risk through its investment holdings. As already stated within the Internal Model and management process, AIUK treats credit risk relating to investments (including cash and debt securities) as part of market risk.



Counterparty default risk

AIUK is also exposed to credit risk through the diminution in the value of insurance receivables as a result of counterparty default. This principally comprises default and concentration risks relating to amounts receivable from intermediaries, policyholders and reinsurers. Reinsurance and retrocession does not isolate AIUK from its obligations to policyholders. In the event that a reinsurer or retrocessionaire fails to meet its obligation, AIUK's obligations remain.

Processes for addressing and monitoring risk

As with Insurance risk, AIUK models exposure to credit risks using the Internal Model to measure the associated capital requirements on the Solvency II SCR regulatory basis. Modelling of credit risk exposures is the key process for monitoring and managing credit risk.

In certain situations the Company requires reinsurers to place collateral to act as security against the credit risk arising out of reinsurance arrangements. In particular collateral is used to protect the Company against credit risk in relation to the ABL and ADC reinsurance arrangements.

The processes for addressing credit risk in relation to financial instruments has already been dealt with as part of the explanation of the processes to address market risk. The Group Credit Risk policy defines the processes for assessing, monitoring, and managing credit exposure to intermediaries, policyholders, and reinsurance counterparties.

Material Risk Concentrations

AIUK limits its exposure to material risk concentrations through the use of Key Risk Limits. AIUK is potentially exposed to concentrations of credit risk in respect of amounts recoverable from reinsurers, and insurance and reinsurance balances owed by the brokers with whom it transacts business. AIUK manages the levels of credit risk by placing limits on its exposure to a single counterparty, or groups of counterparty. Such risks are subject to regular review. The creditworthiness of reinsurers is considered on an annual basis by reviewing their financial strength prior to finalisation of any contract. In addition, management assesses the creditworthiness of all reinsurers and intermediaries by reviewing credit grades provided by rating agencies and other publicly available financial information. The recent payment history of reinsurers is also used to update the reinsurance purchasing strategy. AIUK has risk limits for the amount of exposure to both third party and intragroup related reinsurers and any breaches of those limits are reported to the AIUK Risk Committee and Board, and the Company makes use of collateral arrangements to further reduce credit risk. The effectiveness of these risk mitigation techniques is assessed through continual monitoring of the underlying risk profile.



Assets - credit risk analysis	2021	2020
	\$m	As restated \$m
Reinsurers' share of claims outstanding	2,697.2	2,803.9
Debtors arising out of direct insurance operations - intermediaries	70.6	48.7
Debtors arising out of reinsurance operations	503.9	597.1
Cash at bank and in hand	115.3	109.3
Deposits with ceding undertakings	36.0	35.2
Loans and receivables	15.7	15.0
	3438.7	3609.2
<i>Other financial investments</i>		
Debt securities and other fixed income securities	2,232.4	1,917.9
Short term investments	176.0	482.1
Derivative financial assets	4.7	13.4
	2,413.1	2,413.4
Total assets bearing credit risk	5,851.8	6,022.6

Assets Type by Credit Rating – 2021

	AAA	AA	A	BBB	Below B	Not rated	Total
	\$m	\$m	\$m	\$m	\$m	\$m	\$m
Reinsurers' share of claims outstanding	—	151.4	1,971.8	—	429.8	144.2	2,697.2
Debtors arising out of direct insurance operations - intermediaries	—	—	—	—	—	70.6	70.6
Debtors arising out of reinsurance operations	—	—	—	—	—	503.9	503.9
Cash at bank and in hand	—	—	—	—	—	115.3	115.3
Deposits with ceding undertakings	—	—	—	—	—	36.0	36.0
Loans and receivables	—	—	—	—	—	15.7	15.7
	—	151.4	1,971.8	—	429.8	885.7	3,438.7
<i>Other financial investments</i>							
Debt securities and other fixed income securities	287.4	1,207.1	677.7	59.0	—	1.2	2,232.4
Short term investments	—	5.5	0.5	0.1	—	169.9	176.0
Derivative financial assets	—	—	—	—	—	4.7	4.7
Total assets bearing credit risk	287.4	1,364.0	2,650.0	59.1	429.8	1,061.5	5,851.8



Assets Type by Credit Rating – 2020

	AAA	AA	A	BBB	Below B	Not rated	Total
Reinsurers' share of claims outstanding	—	166.2	1,969.6	—	449.6	218.5	2,803.9
Debtors arising out of direct insurance operations - intermediaries	—	—	—	—	—	48.7	48.7
Debtors arising out of reinsurance operations	—	—	—	—	—	597.1	597.1
Cash at bank and in hand	—	—	—	—	—	109.3	109.3
Deposits with ceding undertakings	—	—	—	—	—	35.2	35.2
Loans and receivables	—	—	—	—	—	15.0	15.0
	—	166.2	1,969.6	—	449.6	1,023.8	3,609.2
<i>Other financial investments</i>							
Debt securities and other fixed income securities	214.8	1,124.4	511.0	67.7	—	—	1,917.9
Short term investments	—	80.0	—	—	—	402.1	482.1
Derivative financial assets	—	—	—	—	—	13.4	13.4
Total assets bearing credit risk	214.8	1,370.6	2,480.6	67.7	449.6	1,439.3	6,022.6

Collateral

The amount and type of collateral required depends on an assessment of the credit risk of the counterparty. Guidelines are implemented regarding the acceptability of types of collateral and the valuation parameters. Credit risk is also mitigated by entering into collateral agreements. Management monitors the market value of the collateral, requests additional collateral when needed, and performs an impairment valuation when applicable. At 31 December 2021, the fair value of such collateral held was \$374.0m (2020: \$385.0m). All collateral held is against reinsurers' share of claims outstanding. No collateral received from the counterparty has been sold or repledged (2020: \$nil).

(f) Liquidity risk

Liquidity risk is defined as the risk of failing to maintain sufficient liquid financial resources to meet liabilities as they fall due or to provide collateral as required for commercial or regulatory purposes.

Liquidity risk includes the following:

- Payment default risk: the risk that there is insufficient cash to make payments when due and that no additional cash can be made available by borrowing, sale of assets, or capital raising.
- Risk of unplanned asset realisation losses: the risk that securities are required to be sold at a loss to meet liquidity requirements.
- Risk of failure of credit facility: the risk that advances from the credit facility are unavailable.
- Group liquidity risk: the risk that liquidity cannot be secured for a Group company from elsewhere in the Group.
- Collateral risk: the risk that AIUK is unable to provide collateral to a third party when contractually required to do so.

Processes for addressing and monitoring risk

Unlike insurance, market, and credit risk, AIUK does not model and manage liquidity risk using its Internal Model as it is not a risk that is mitigated by holding capital against it. AIUK's annual Stress & Scenario Testing



("SST") process is used to determine the basis of the key liquidity risk limit. The Liquidity Risk Policy provides further details of how liquidity risks are identified, monitored, managed and modelled. This includes details of an escalation process for a breach of the minimum free funds limit.

Material Risk Concentrations

AIUK limits its exposure to material risk concentrations through the operation of the Liquidity Risk Policy. This highlights the measures that Aspen have put in place in order to maintain an agreed amount of unencumbered assets in cash and cash equivalents. These measures include concentration limits to ensure the liquidity of assets, appropriateness of the marketability or realisability of assets, and a liquidity contingency funding plan.

Liquidity stress testing is carried out against AIUK's and the Group's risk profiles at least annually by the Risk Management department as part of the Stress and Scenario Testing programme. This allows management to identify the potential strains on AIUK's liquidity as a result of the scenarios assessed as well as gaining understanding of the Group's ability to support the liquidity needs of entities such as AIUK as the need arises. Cash flow forecasting is also used to reduce liquidity risk. The effectiveness of these risk mitigation techniques is assessed through continual monitoring of the underlying risk profile. The table below analyses the Company's liabilities into their relevant maturity groups based on the period remaining at the year end to their contractual maturities or expected settlement dates:

Liabilities – liquidity risk analysis

31 December 2021	Up to 1 year	1-3 years	3-5 years	Over 5 years	Total
	\$m	\$m	\$m	\$m	\$m
Claims outstanding	1,023.6	1,119.8	630.1	1,006.8	3,780.3
Provision for unearned premiums	367.0	211.9	71.6	27.3	677.8
Amounts due to group undertakings	331.2	—	—	—	331.2
Other creditors	389.0	—	—	—	389.0
Accruals and deferred income	36.2	—	—	—	36.2
Total	2,147.0	1,331.7	701.7	1,034.1	5,214.5

31 December 2020	Up to 1 year	1-3 years	3-5 years	Over 5 years	Total
	\$m	\$m	\$m	\$m	\$m
Claims outstanding	985.3	1,136.5	585.9	1,135.9	3,843.6
Provision for unearned premiums	500.9	138.0	55.8	49.4	744.1
Amounts due to group undertakings	626.7	—	—	—	626.7
Other creditors	357.5	—	—	—	357.5
Accruals and deferred income	37.9	—	—	—	37.9
Total	2,508.3	1,274.5	641.7	1,185.3	5,609.8



3. Segmental Information

Year 2021	Gross Premiums Written	Gross Premiums Earned	Gross Claims Incurred	Gross Operating Expenses	Reinsurance Balance	Underwriting Result
	\$m	\$m	\$m	\$m	\$m	\$m
Direct insurance:						
Fire and other damage to property	164.1	153.7	(74.7)	(29.0)	(35.4)	14.7
Third party liability	170.2	162.0	(143.7)	(30.3)	10.4	(1.6)
Marine, aviation and transport	4.5	14.5	(62.0)	(5.0)	33.3	(19.2)
Credit and suretyship	30.1	33.8	(9.2)	(15.2)	(14.8)	(5.4)
	68.9	364.0	(289.6)	(79.5)	(6.5)	(11.6)
Reinsurance acceptances:						
Credit and suretyship	17.6	47.8	5.7	(29.6)	(24.5)	(0.6)
Fire and other damage to property	428.6	462.1	(289.4)	(150.0)	(74.1)	(51.4)
Miscellaneous	(1.6)	(0.9)	0.8	(11.2)	(1.1)	(12.4)
Marine, aviation and transport	108.3	132.8	(85.5)	(39.5)	(7.7)	0.1
Motor (third-party liability)	(10.1)	(2.9)	4.1	4.1	(1.0)	4.3
Third party liability	360.3	337.5	(151.7)	(98.0)	(20.9)	66.9
	903.1	976.4	(516.0)	(324.2)	(129.3)	6.9
	1,272.0	1,340.4	(805.6)	(403.7)	(135.8)	(4.7)



	Gross Premiums Written	Gross Premiums Earned	Gross Claims Incurred	Gross Operating Expenses	Reinsurance Balance	Underwriting Result
Year 2020						
	\$m	\$m	\$m	\$m	\$m	\$m
Direct insurance:						
Fire and other damage to property	133.1	126.0	(85.9)	(33.2)	(25.3)	(18.4)
Third party liability	144.9	143.0	(135.4)	(35.4)	44.4	16.6
Marine, aviation and transport	25.0	35.2	(20.1)	(7.1)	3.4	11.4
Credit and suretyship	41.6	60.4	(56.0)	(21.7)	11.2	(6.1)
	<u>344.6</u>	<u>364.6</u>	<u>(297.4)</u>	<u>(97.4)</u>	<u>33.7</u>	<u>3.5</u>
Reinsurance acceptances:						
Credit and suretyship	32.7	66.0	(28.7)	(29.0)	(12.9)	(4.6)
Fire and other damage to property	465.7	457.5	(286.7)	(153.3)	(31.7)	(14.2)
Miscellaneous	(0.3)	0.2	3.1	(21.3)	(1.9)	(19.9)
Marine, aviation and transport	124.2	113.3	(57.5)	(29.3)	(17.7)	8.8
Motor (third-party liability)	30.9	43.0	(24.0)	(9.5)	(4.6)	4.9
Third party liability	347.2	308.5	(277.8)	(96.1)	42.2	(23.2)
	<u>1,000.4</u>	<u>988.5</u>	<u>(671.6)</u>	<u>(338.5)</u>	<u>(26.6)</u>	<u>(48.2)</u>
	<u>1,345.0</u>	<u>1,353.1</u>	<u>(969.0)</u>	<u>(435.9)</u>	<u>7.1</u>	<u>(44.7)</u>

The underwriting result represents the balance on the technical account before investment income. The reinsurance balance is the aggregate total of all those items included in the technical account which relate to reinsurance outwards transactions including items recorded as reinsurance commissions and profit participation as noted in Note 6.

The above analysis does not reflect the way in which the business is managed. For example, ceding commission is applied consistently across each line of business above, however this does not reflect the known differences in acquisition costs between lines of business.



Geographical analysis

The following is a breakdown by geography of the gross written premium, (on the basis of the country where AIUK had operations writing the business):

	2021	2020
	\$m	\$m
United Kingdom	711.1	732.3
USA	442.5	416.9
Switzerland	1.8	24.9
Republic of Ireland	—	4.5
Canada	41.8	27.7
Australia	41.0	60.2
Singapore	33.9	59.2
United Arab Emirates	—	19.3
	1,272.1	1,345.0

4. Net Claims Incurred

	2021	2020
	\$m	\$m
Current year claims movement	(420.5)	(486.4)
Prior years' claims movement	35.3	243.4
	(385.2)	(243.0)

5. Other Expenses / Income

Other income of \$37.5m gain (2020: \$57.3m expenses) consist mainly of realised foreign exchange gain/losses.

6. Net Operating Expenses

	2021	2020
	\$m	\$m
Acquisition costs	307.5	307.7
Change in net deferred acquisition costs	15.1	15.3
	322.6	323.0
Administrative expenses	82.3	107.9
Gross operating expenses	404.9	430.9
Reinsurance commission and profit participation	(199.2)	(188.9)
	205.7	242.0

Commissions in respect of direct insurance business amounted to \$45.8m (2020: \$48.1m).



7. Investment Return

	2021	2020
	\$m	\$m
Income from other financial investments	37.3	39.8
Net gains on realisation of investments:		
Fair value through profit or loss designated upon initial recognition	(1.7)	21.4
Realised (losses)/gains on derivative contracts	—	7.0
Total income	35.6	68.2
Net unrealised (losses)/gains on investments:		
Financial instruments at fair value through profit or loss	(113.3)	50.9
Unrealised losses on derivatives contracts	(0.7)	(2.0)
Investment expenses and charges	(1.8)	(3.1)
Total investment return	(80.2)	114.0

8. Profit and Loss Account

Loss/profit before tax is stated after charging:

	2021	2020
	\$m	\$m
Depreciation of tangible fixed assets (Note 12)	—	—
Defined contribution plan expense	2.3	2.5
Share based payments made to directors and employees (Note 22)	(0.7)	1.0
Auditor's remuneration		
Audit of these financial statements	1.3	0.8
Amounts receivable by the auditors and their associates in respect of:		
Audit related assurance services	0.3	0.3

9. Directors' Emoluments

The aggregate emoluments of the Directors were as follows:

	2021	2020
	\$m	\$m
Aggregate emoluments	1.2	1.0
	1.2	1.0

No (2020: none) Directors exercised share options in respect of qualifying services under long term incentive schemes. No (2020: none) advances or credits were granted to any Director subsisted during the year and no (2020: none) guarantees on behalf of any Director were subsisted during the year.



Highest Paid Director

	2021	2020
	\$m	\$m
Aggregate emoluments and benefits	0.5	0.3

In respect of the highest paid Director no share options in respect of qualifying services under long term incentive schemes were received in the year and no shares were receivable in respect of qualifying services under long term incentive schemes.

10a. Taxation

	2021	2020
	\$m	\$m
<i>U.K. corporation tax</i>		
Current tax on result for the year	—	—
Adjustments in respect of prior periods	—	(3.5)
Total U.K. current tax (charge)	—	(3.5)
<i>Foreign tax</i>		
Current tax on foreign income for the year	(1.5)	(7.0)
Adjustments in respect of prior periods	1.7	(2.4)
Total current tax credit/(charge)	0.2	(12.9)
<i>Deferred tax (see note 10b)</i>		
Origination / reversal of timing differences	3.8	0.4
Adjustments in respect of prior periods	(4.8)	2.9
Impact of rate change	(0.5)	(1.2)
Total deferred tax (charge)/credit	(1.5)	2.1
Tax (charge) on loss/profit on ordinary activities	(1.3)	(10.8)

The tax charge (2020: charge) for the period is higher (2020: higher) than the standard rate of corporation tax in the UK of 19%. The differences are explained below.



	2021	2020
	\$m	\$m
<i>Tax reconciliation</i>		
(Loss)/profit before tax	(47.4)	11.9
Current tax credit/(charge) at 19%	9.0	(2.3)
<i>Effects of:</i>		
Non-deductible expenses	—	(0.3)
Impact of overseas tax	2.1	(4.0)
Foreign exchange	—	0.1
Adjustments in respect of prior periods	(3.1)	(3.0)
Remeasurement of deferred tax for changes in tax rates	(0.5)	(1.2)
Permanent differences in respect of fixed assets	—	(0.1)
Deferred tax not recognised	(7.1)	—
Total tax (charge)	(1.3)	(10.8)

10b. Deferred Taxation

The deferred tax asset recognised in the financial statements is as follows:

	2021	2020
	\$m	\$m
Temporary differences related to overseas branches	(2.6)	2.7
Temporary differences related to FRS 102 transitional adjustments	(0.3)	(0.3)
Losses carried forward	12.1	8.3
	9.2	10.7

The Finance Act 2021 was enacted on 10 June 2021 and has increased the corporation tax rate from 19% to 25% with effect from 1 April 2023. The deferred taxation balances have been measured using the rates expected to apply in the reporting periods when the timing differences reverse.

Deferred tax of \$12.1m has been recognised on \$53.2m of losses carried forward at an average tax rate of 22.7% over the next 3 years. Deferred tax on \$37.3m of losses carried forward has not been recognised as there are insufficient profits in the Company's business plan to utilise these.

11. Currency Translation

The currency translation gain of \$36.5m (2020: \$33.8m gain restated) represents unrealised gains (2020: gains) arising from the translation into US Dollars of the Company's branch operations. The functional currencies of the Company's branches are Euros, Australian Dollars, Singaporean Dollars and Canadian Dollars. Assets and liabilities of foreign operations are translated into US Dollars at the exchange rate prevailing at the



balance sheet date. The exchange differences arising from this translation are included in the Statement of Comprehensive Income.

12. Tangible Assets

Details of tangible asset net book values as at the Balance Sheet date by major category are given below:

	Office and Other Equipment	Leasehold Improvements	Hardware and Software	Total Assets
	\$m	\$m	\$m	\$m
Cost				
As at 1 January 2021	2.4	14.9	56.4	73.7
As at 31 December 2021	2.4	14.9	56.4	73.7
Depreciation				
As at 1 January 2021	2.4	14.4	56.4	73.2
Movement in the year	—	—	—	—
As at 31 December 2021	2.4	14.4	56.4	73.2
Net Book Value				
As at 31 December 2020	—	0.5	—	0.5
As at 31 December 2021	—	0.5	—	0.5

13. Other Financial Assets and Liabilities

	2021		2020	
	Cost	Market Value	Cost	Market Value
	\$m	\$m	\$m	\$m
Financial assets at fair value				
Derivative assets held at fair value through profit and loss	—	4.7	—	13.4
Debt securities and other fixed income securities	2,221.8	2,232.3	1,825.3	1,917.9
Short term investments	176.0	176.0	477.9	482.1
<i>Financial assets at fair value through profit and loss</i>	2,397.8	2,413.0	2,303.2	2,413.4
Financial liabilities at fair value				
Derivative liabilities held at fair value through profit and loss	—	5.4	—	4.5



Listed Investments

Included in the carrying values above are amounts in respect of listed investments as follows:

	2021		2020	
	Cost	Market Value	Cost	Market Value
	\$m	\$m	\$m	\$m
Financial assets at fair value				
Debt securities and other fixed income securities	2,059.0	2,069.7	1,777.7	1,865.5
Short term investments	5.8	5.8	0.1	0.1
Total financial assets	2,064.8	2,075.5	1,777.8	1,865.6

Derivative financial instruments, at fair value through profit or loss

The Company uses limited forward foreign currency contracts to mitigate some adverse movements associated with changes in foreign exchange rates in respect of changes in the foreign currency rate from the collection of premiums to the payment of claims by fixing the rate of any material payments in a foreign currency.

	2021	2020
	\$m	\$m
Total Financial Assets	4.7	13.4
Total Financial Liabilities	5.4	4.5

Fair Value Estimation

The table below analyses financial instruments carried at fair value, by valuation method. The different levels have been defined as follows:

Level 1	Quoted market prices (unadjusted) in active markets for identical assets or liabilities.
Level 2	Inputs other than quoted prices included within level 1 that are observable for the asset or liability, either directly (that is, as prices) or indirectly (that is, derived from prices).
Level 3	Inputs for the asset or liability that are not based on observable market data (that is, unobservable inputs).



The following table presents the Company's assets and liabilities measured at fair value at 31 December 2021 and 31 December 2020:

2021				
	Level 1	Level 2	Level 3	Total
	\$m	\$m	\$m	\$m
Financial assets at fair value				
Debt securities and other fixed income	740.9	1,491.4	—	2,232.3
Short term investments	175.4	0.6	—	176.0
Derivatives	—	4.7	—	4.7
	916.3	1,496.7	—	2,413.0
Financial liabilities at fair value				
Derivatives	—	(5.4)	—	(5.4)
Total	916.3	1,491.3	—	2,407.6
2020				
	Level 1	Level 2	Level 3	Total
	\$m	\$m	\$m	\$m
Financial assets at fair value				
Debt securities and other fixed income	805.9	1,112.0	—	1,917.9
Short term investments	482.1	—	—	482.1
Derivatives	—	13.4	—	13.4
	1,288.0	1,125.4	—	2,413.4
Financial liabilities at fair value				
Derivatives	—	(4.5)	—	(4.5)
Total	1,288.0	1,120.9	—	2,408.9

The fair value of financial instruments traded in active markets is based on quoted bid prices at the balance sheet date as described in the accounting policy. These instruments are included in Level 1. Instruments included in Level 1 comprise primarily listed debt securities.

The Company closely monitors the valuation of assets in markets that have become less liquid. Determining whether a market is active requires the exercise of judgement and is determined based upon the facts and circumstances of the market for the instrument being measured. Where it is determined that there is no active market, fair value is established using a valuation technique. The techniques applied incorporate relevant information available and reflect appropriate adjustments for credit and liquidity risks. These valuation techniques maximise the use of observable market data where it is available and rely as little as possible on entity specific estimates. The relative weightings given to differing sources of information and the determination of non-observable inputs to valuation models can require the exercise of significant judgement.



Instruments included in Level 2 are generally based on composite prices of recent trades in the same instrument and comprise primarily US Government and Agency Securities, Municipal Securities, Non-US Government Securities, Corporate Securities and Mortgage-backed Securities.

If one or more of the significant inputs is not based on observable market data, the instrument is included in Level 3. The Company has no level 3 instruments (2020: none).

Transfers of assets into or out of a particular level are recorded at their fair values as of the end of each reporting period, consistent with the date of the determination of fair value. There were no transfers between Level 1 and Level 2 of non-US government securities during the twelve months ended December 31, 2021 and December 31, 2020. There were no transfers between Level 2 and Level 3 during the year ended December 31, 2021 (December 31, 2020: none).

14. Debtors

	2021	2020
		As restated
Debtors arising out of direct insurance operations	\$m	\$m
Amounts due in less than one year	65.9	42.4
Amounts due in greater than one year	4.7	6.3
	70.6	48.7
Debtors arising out of reinsurance operations		
Amounts due in less than one year	411.2	516.3
Amounts due in greater than one year	92.7	80.8
	503.9	597.1
Other Debtors		
	2021	2020
	\$m	\$m
Deferred tax asset (Note 10b)	9.2	10.7
Corporation tax	6.4	—
Sundry debtors	6.5	4.3
	22.1	15.0



15. Amounts due to / from fellow group undertakings

	2021	2020
	\$m	\$m
Amounts due to fellow group undertakings		
Amounts due to fellow group undertakings	331.1	626.7
	331.1	626.7
Amounts due from fellow group undertakings		
Amounts due from fellow group undertakings	39.0	170.6
	39.0	170.6

Within amounts due from fellow group undertakings the following inter-company loans are included:

- \$30.0m (2020: \$36.0m) loan issued on 1 April 2017 by AIUK to AIUKS, this loan bears interest of 5.6% per annum with a maturity date of 1 April 2027; and
- \$12.9m (2020: \$17.2m) loan issued on 15 December 2014 by AIUK to Aspen U.S. Holdings, Inc., this loan bears interest of 4.35% per annum with a maturity date of 15 December 2024.

16. Other Creditors

	2021	2020
	\$m	\$m
Underwriting creditors	377.6	333.6
Fair value in respect of derivatives	5.4	4.5
Other indirect taxes	6.1	14.1
Corporation tax	—	5.3
	389.1	357.5

17. Contingencies and Other Liabilities

At 31 December 2021 and 2020 the Company had granted charges over a variety of its assets in the ordinary course of business in respect of potential future insurance liabilities and as collateral for letters of credit and US and Canadian Trust funds. The charged assets comprised the following categories:

	2021	2020
	\$m	\$m
US Surplus Lines Trust	110.0	110.0
US Reinsurance Trust Fund	1,186.0	1,082.0
Australia Branch	165.0	198.0
Canadian Branch	156.0	123.0
Other	374.0	385.0
	1,991.0	1,898.0

The Company had no other contingencies or other liabilities at the reporting date.

The notes on pages 43 to 76 form an integral part of these financial statements



18. Deferred Acquisition Costs

	2021	2020
	\$m	\$m
At 1 January	139.0	152.3
Movement in the year (Note 6)	(15.1)	(15.3)
Exchange adjustments	(6.8)	2.0
At 31 December	117.1	139.0

19. Technical Provisions

	2021		2020	
	Claims Reserves	Unearned Premium Reserves	Claims Reserves	Unearned Premium Reserves
	\$m	\$m	\$m	\$m
Gross of reinsurance				
At 1 January	3,843.6	744.1	3,834.5	758.0
Movement in the year	(14.8)	(68.4)	(63.8)	(8.1)
Exchange adjustments	(48.5)	2.1	72.9	(5.8)
At 31 December	3,780.3	677.8	3,843.6	744.1
Reinsurance				
At 1 January	2,803.9	143.8	2,565.4	130.9
Movement in the year	2.0	(5.1)	158.0	31.3
Exchange adjustments	(108.7)	15.0	80.5	(18.4)
At 31 December	2,697.2	153.7	2,803.9	143.8

20. Commitments

The Company has no capital commitments authorised or contracted for at the year-end. Future minimum rentals payable under non-cancellable operating leases are as follows:

	2021	2020 restated
	\$m	\$m
Within one year	4.8	6.4
Between one and five years	19.1	20.4
After five years	13.0	18.2
	37.0	45.0

The expense in the year for operating leases amounts was \$6.1m (2020: \$6.6m).



21. Share Capital

The paid up capital is set out below.

	2021		2020	
	£m	\$m	£m	\$m
Allotted, issued and fully paid up 410,000,000 (2020: 410,000,000) ordinary shares of £1 each	410.0	614.9	410.0	614.9

The Company received capital contributions of \$150m and \$320m from its former immediate holding company, Aspen (UK) Holdings Limited, on 23 March 2006 and 22 March 2011, respectively. The Company was sold to AEHL on 26 February 2015 through an internal re-organisation to optimise the Company's regulatory structure. On 22 December 2020 the Company received a further capital contribution of \$85m from AEHL. The company received a further two cash capital contributions of \$50m in July 2021 from AEHL.

The total funds available for distribution of \$348.7m (2020: \$260.9m) include the \$655m (2020: \$555m) capital contribution reserve, less the \$306.3m (2020: \$294.1m) profit and loss account.

22. Share Based Payments

In prior years AIHL, the Company's ultimate parent, has issued options, performance shares, phantom shares, and restricted share units under the 2003 and 2013 Share Incentive Plans.

Following the merger agreement between Apollo Global Management and Aspen Insurance Holdings Limited the Company implemented a new long-term incentive scheme, under which annual awards are split equally between Performance Units and Exit Units. Performance Units vest after two years subject to the Aspen Group achieving predetermined growth in book value per share targets. Exit Units vest upon change of control (sale or IPO) and achieving predetermined multiples of invested capital return targets. Both Performance Units and Exit Units are cash-based awards.

23. Related Parties Transactions

As AIHL is incorporated in Bermuda, the Company is exempt from disclosing related party transactions with fellow subsidiaries which are also wholly owned by AIHL. During the period the Company entered into transactions, in the ordinary course of business, with related parties which are not wholly owned by AIHL.

Apollo Asset Management Europe PC LLP

Apollo's indirect subsidiary, Apollo Asset Management Europe PC LLP ("AAME"), serves as the investment manager for the Company. It provides centralised asset management, investment advisory and risk services for the portfolio of the Company's investments pursuant to the investment management agreements ("IMAs") that have been entered into with AAME.

AAME is integrated into the Apollo investment platform and provides the Company with access to Apollo's investment expertise and fully built infrastructure without the burden of incurring the development and maintenance costs of building an in-house investment asset manager with the capabilities of Apollo/AAME.



AAME is registered in England and Wales and is authorised and regulated by the Financial Conduct Authority in the United Kingdom under the Financial Services and Markets Act 2000 and the rules promulgated thereunder for the primary purpose of providing a centralised asset management and risk function to European clients in the financial services and insurance sectors. AAME has necessary permissions to engage in certain specified regulated activities including providing investment advice, undertaking discretionary investment management, and arranging deals in relation to certain types of investment.

In April 2019, following the completion of the merger between Apollo Global Management and Aspen Insurance Holdings Limited, AAME was engaged as the investment advisor for the Company to manage the assets of the Company. AAME is paid an annual investment management fee (the “Management Fee”) which is based on a cost-plus structure. The “cost” is comprised of the direct and indirect fees, costs, expenses, and other liabilities arising in or otherwise connected with the services provided under the IMAs. The “plus” component will be a mark-up in an amount of up to 25% determined based on an applicable transfer pricing study. The Management Fee will be subject to certain maximum threshold levels, including an annual fee cap of 15 bps of the total amount of investable assets. Affiliated sub-advisors, including AMI and AMC, will also earn additional fees for sub-advisory services rendered.

During the year ended December 31, 2021, the Company recognised IMA fees of \$0.8 million (2020: \$0.9 million), of which \$0.2 million (2020: \$0.2 million) remains payable to AAME at year end.

24. Ultimate Holding Company

The ultimate parent company of the Group as at 31 December 2021 was Highlands Bermuda HoldCo, Ltd., incorporated in Bermuda. Highlands Holdings, Ltd. was renamed as Highlands Bermuda HoldCo, Ltd. on 5 March 2021. The largest and smallest group in which the results of the Company are consolidated is that headed by AIHL. The consolidated accounts of this company are available to the public and may be obtained from The Company Secretary, Aspen Insurance Holdings Limited, c/o 30 Fenchurch Street, London, EC3M 3BD.

25. Events After the Balance Sheet Date

The Company will continue to monitor the position in Ukraine and Russia. There remains considerable uncertainty on the ultimate outcome but at this stage the potential losses arising are not materially out of line to the Company’s plan for large losses. Also, the Company has no direct investment exposure and is not anticipating any liquidity strain as a result of the current situation.

Subsequent to the year end the Aspen Group has entered into a Loss Portfolio Transfer (“LPT”) arrangement with Enstar. This transaction builds on the Adverse Development Cover Aspen agreed with Enstar in 2020, replacing it with an LPT for all losses for the 2019 and prior accident years of account. This transaction is for \$450m of Group adverse development which attaches at the Group’s \$3.12bn of Q3 2021 net reserves from 2019 and prior accident years and operates on a funds withheld basis, with the assets equal in value to any remaining net reserves transferring in September 2025. The risk premium for the LPT for the Aspen Group is \$10m. If closing conditions are met, the transaction is expected to close in Q2 2022. This contract would ensure that the Group, and therefore the Company, are substantially covered against further deterioration on the 2019 and prior accident years.



26. Restatement

During the second quarter of 2021, the Company identified issues with the treatment of foreign exchange gains and losses arising as a result of currency matching issues within its underwriting premium receivables. Underwriting premium receivables are included within debtors arising out of direct insurance operations - intermediaries and debtors arising out of reinsurance operations on AIUK's balance sheet. This resulted in previous foreign exchange revaluation and translation amounts, which should have been matched with an underwriting premium receivable payment being carried over, and were included in the Company's underwriting premium receivable, thereby overstating the related asset value.

In accordance with UK GAAP, The Company has, therefore, adjusted the comparatives of the 2021 financial statements of AIUK by restating the prior period information. The 31 December 2020 information has been restated to include an \$89.7m downward adjustment on underwriting premium receivables within the Company's Balance Sheet (page 43), an \$86.0m adjustment to its 2019 retained earnings on the Company's Statement in Change in Equity (page 42), a \$3.7m loss in the Statement of Comprehensive Income, and a \$2.3m loss on foreign exchange translation within the Company's Statement of Comprehensive Income (page 35).

The impact to the Income Statement and the Statement of Comprehensive Income was not isolated to 2021 and 2020, and dates back a number of years. As such the 2020 opening balances in the Statement of Changes in Equity have been updated being the earliest period disclosed in these financial statements. The following table provides a summary of the restatements.

	As previously filed \$m	Adjustment \$m	As amended \$m
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Changes to the Balance Sheet

Debtors arising out of direct insurance operations - intermediaries	55.5	(6.8)	48.7
Debtors arising out of reinsurance operations	680.0	(82.9)	597.1
	735.5	(89.7)	645.8

	As previously filed \$m	Adjustment \$m	As amended \$m
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Changes to the Statement of Changes in Equity

Opening profit and loss account	(243.0)	(86.0)	(329.0)
Total comprehensive loss for the year	38.7	(3.7)	35.0
	(204.3)	(89.7)	(294.0)

	As previously filed \$m	Adjustment \$m	As amended \$m
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Changes to the statement of Comprehensive

Profit / (loss) on foreign exchange translation	36.1	(2.3)	33.8
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