



Financial Condition Report

For the twelve (12) month period ended
December 31, 2020



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Background

Bernina Re Ltd. (the "Company") is a Bermuda exempted company limited by shares incorporated in Bermuda and licensed as a Class 3A insurer under the Bermuda Insurance Act 1978 and Related Regulations, as amended (the "Insurance Act") as well as a segregated accounts company ("SAC" or "SACs") pursuant to the Segregated Accounts Companies Act 2000 (the "SAC Act"). This Financial Condition Report has been prepared in order to assist clients to understand the capital position of the Company for the year ended December 31, 2020 (the "Reporting Period") in accordance with the Insurance Act, the Insurance (Eligible Capital) Rules 2012, as amended (the "Eligible Capital Rules") and the Insurance (Public Disclosure) Rules 2015 of Bermuda. All amounts included in this report are expressed in United States Dollars unless otherwise stated.

1. Section A – Business and Performance

1.1 Name of Insurer Bernina Re Ltd. (the "Company")

1.2 Supervisor

	Insurance Supervisor	Group Supervisor
Name	Bermuda Monetary Authority	Not applicable
Mailing Address	P.O. Box 2447 Hamilton HM JX Bermuda	
Telephone	+1 (441) 295 5278	
Fax	+1 (441) 292 7471	
Website	https://www.bma.bm	

1.3 Approved Auditor

	Statutory Reporting	Condensed GAAP Reporting
Name	KPMG Audit Limited	KPMG Audit Limited
Mailing Address	Crown House 4 Par-La-Ville Road Hamilton HM08 Bermuda	Crown House 4 Par-La-Ville Road Hamilton HM08 Bermuda
Telephone	+1 (441) 295 5063	+1 (441) 295 5063
Fax	+1 (441) 295 8280	+1 (441) 295 8280
Website	www.kpmg.bm	www.kpmg.bm

1.4 Ownership Details

The Company is a wholly-owned direct subsidiary of Bernina Re Holding Ltd. ("Bernina Holding"), a Bermuda exempted holding company limited by shares incorporated on August 11, 2017.

- 1.5 Group Structure** Bernina Holding is a wholly-owned direct subsidiary of Bernina Re Purpose Trust, a Bermuda purpose trust formed on August 7, 2017.

Group Structure Chart



- 1.6 Insurance Business Written** The Company’s Gross Written Premiums for the reporting period were USD 252,040 thousand (2019: USD 408,603 thousand). The Company writes reinsurance contracts predominantly in the property catastrophe reinsurance line of business. The Company’s cedants are predominantly located in North America, Europe, Bermuda, Japan and Australia.

- 1.7 Performance of Investments & Material Income & Expenses** **Performance of Investments by Asset Class**

	2020 (USD 000s)	2019 (USD 000s)
Investments held in trust	1,036,942	1,694,199
Return	7,539	32,756
% Return	0.73%	1.93%

Material Income and Expenses

Besides insurance premiums and investment return, there are no further items of material income. Loss expenses are driven by natural and man-made catastrophes. General and administrative expenses principally comprise personnel costs and third-party fees.

	2020 (USD 000s)	2019 (USD 000s)
Loss Expenses	68,259	374,251
Brokerage and FET	42,887	49,773
General and Administrative Expenses	21,160	14,672

- 1.8 Other Material Information** There is no other material information to report.

2. Section B – Governance Structure

2.1 Board and Senior Executive

Overview

The Board of Directors (the “Board”) manages the Company’s affairs and has overall fiduciary responsibility for the Company. The roles and responsibilities and proceedings of the Board are constituted in the Company’s bye-laws.

All Board meetings are conducted in Bermuda and the Board meets a minimum of three times per year.

The following Committee are established to support and advise the Board:

- Enterprise Risk Management Committee
- Underwriting Committee
- Claims & Reserving Committee
- Investment Committee
- Audit Committee

Each Committee reports to the Board and includes at least one Director supported by a minimum of two additional Committee members. Each Committee Chair provides a report to the Board during the next scheduled Board meeting following each Committee meeting.

Remuneration Policy

The Company has developed a remuneration policy with the objective of supporting a performance culture that is based on merit, and which attracts and retains a motivated team. The policy is also designed to align with and promote the Company’s culture of effective risk management practices and high standards of ethical conduct. The policy is anticipated to be approved in early Q2 2021.

Supplementary Pension or Early Retirement Schemes for Members, the Board and Senior Executive

There are no supplementary pension or early retirement schemes for members, the Board and senior executives in addition to those available to all employees of the Company.

Material Transactions with Shareholder Controllers, Persons who Exercise Significant Influence, the Board or Senior Executive

There were no material transactions with shareholder controllers, persons who exercise significant influence, the Board or senior executive during the reporting period, except for Directors’ fees and employees’ salary and expenses payments in the ordinary course of employment.

2.2 Fitness and Propriety Requirements

Fit and Proper Process

All Board and senior executive appointments are subject to a fit and proper criteria process which includes:

- detailed review of Director’s biography and related due diligence procedures;
- interview process with representatives of the Board; and
- annual Board evaluation and shareholder approval.

Professional Qualifications, Skills and Expertise of the Board and Senior Executives

The Board comprises financial and insurance executives with significant experience in their respective professions, including senior partner and executive-level experience in major insurance companies and leading insurance management companies.

The combination of skillsets brought by the five directors, including three non-executive directors, covers the relevant areas for the Company and allows the Board to exert an efficient and effective oversight.

All senior executives have long track records in the insurance industry. A significant amount of underwriting experience is complemented with audit, accounting, operations, risk and compliance knowledge.

Director	Position	Residence	Insurance Industry Work Experience
Robert Eastham	Non-Executive Director	Bermuda	37 years
Elizabeth Murphy	Non-Executive Director	Bermuda	42 years
Niklaus Hilti	Director	Switzerland	18 years
Steve Britton	Director	Bermuda	26 years
Robert Cooney	Non-Executive Director	Bermuda	23 years

Officer	Position	Residence	Insurance Industry Work Experience
Christian Bieri	Chief Executive Officer and Chief Underwriting Officer	Bermuda	20 years
Andreas Kull	Chief Risk Officer	Bermuda	22 years
Michael Dennis	Chief Financial Officer and Chief Operating Officer	Bermuda	15 years
Filipe da Cruz	Head of Swiss Branch & International Underwriting	Switzerland	21 years
Ben Stone	Compliance Officer	Bermuda	13 years

2.3 Risk Management and Solvency Self-Assessment

Risk Management Process & Procedures to Effectively Identify, Measure, Manage and Report on Risk Exposures

The Company's Board recognizes that there are numerous risks facing the Company. The Company's Board has established an Enterprise Risk Management Committee ("ERM Committee") to assist it in fulfilling its oversight responsibilities by providing guidance regarding risk governance and the monitoring of the Company's risk profile and capital adequacy, including regular review of major risk exposures and overall risk limits but also evaluating emerging risks identified which may affect the Company's financial and reputational soundness.

The first line of defense is responsible for identifying risks. The CRO facilitates the collation of risk assessments on at least an annual basis. These risks are reflected in the Company's "Risk Register" which is reviewed and approved by the ERM Committee at each meeting.

The Company has documented detailed guidelines and procedures to mitigate and control each of the risks identified within the Risk Register which address underwriting, investment, credit, operational, legal, group, strategic and reputational risks.

Risk Management and Solvency Self-Assessment Implementation and Integration

The Company's risk management framework is built on:

- the Company's risk strategy, defined by the risk appetite, risk tolerance and limits that the Company is willing to accept in pursuing its business strategy;
- the Company's internal control organization and governance;
- the Company's risk management function;
- the Company's risk management process, ensuring the identification of all material risks (including emerging risks and behavior risks) inherent to its business, assessing, controlling, monitoring, mitigating and managing these risks; and
- timely monitoring and reporting.

It comprises the following major elements:

- Risk governance documentation
- Key risk management principles
- Fundamental roles for delegated risk-taking
- Risk culture
- Organization of risk management
- Risk control framework
- Risk appetite framework including limits

The Company completes an annual solvency self-assessment which combines the Company's perspective of the capital resources necessary to achieve its business strategies, and to remain solvent, given its risk profile, as well as insight into the risk management and governance procedures surrounding this process, which brings together the business strategy, risk appetite and risk profile of the Company, to ensure capital adequacy for all years through the Company's business planning horizon. The Company documents its Commercial Insurer's Solvency Self-Assessment ("CISSA") process and submits it, along with the Bermuda Solvency Capital Requirement ("BSCR") filing, to the Board for review and approval.

Relationship Between Solvency Self-Assessment, Solvency Needs and Capital and Risk Management Systems

Currently the Company operates as a fully collateralized reinsurer. As such, underwriting risk has no significant impact on solvency and investment risk is limited. The BMA requires a minimum capital of USD 1,000 thousand which the Company adequately meets. The Company intends to transit from its current collateralized model in future years and has, through the CISSA process, considered the additional risks and the potential impact on its future solvency position. The Company believes the current and expected future capital levels are appropriate and sufficient.

2.4 Internal Controls

Internal Control System

The Company has systems, processes and procedures to ensure that data and reporting is reliable, organizational policies are adhered to, and adequate security measures are implemented. Any deficiencies or material weaknesses that are found are documented and presented to the Board.

Compliance Function

The Compliance function is outsourced to Aon Insurance Managers (Bermuda) Ltd. The Compliance Function has the responsibility to monitor regulatory changes in the relevant jurisdictions and compliance with applicable existing laws, including regulatory reporting and public disclosure requirements. The Company has developed and implemented a compliance manual designed to comply with relevant regulations. The compliance manual has been approved by the Board.

The Compliance Function monitors compliance with organizational policies and procedures and adherence to the Company's Code of Ethics.

2.5 Internal Audit

The Company has an internal audit function established as the third line of defense whose primary responsibility is to provide the management team, the Audit Committee and the Board with an independent and objective analysis and appraisal of:

- the efficiency and effectiveness of the Company's governance, operations and internal control system;

- the reliability and completeness of its financial, management and risk management information systems; and
- compliance with applicable laws and regulations.

2.6 Actuarial Function The actuarial function is outsourced to a third-party service provider. The actuarial function is responsible for setting, monitoring and adjusting actuarial reserves, including technical provisions. The actuarial function assists the Board with its oversight responsibilities regarding reserving.

2.7 Outsourcing The Company outsources certain operational activities to third-party service providers where the Board believes this can provide access to superior processes and technical skills than the Company could achieve on a standalone basis. The Company has developed and implemented an outsourcing policy. All outsourcing arrangements are governed by appropriate service level agreements.

Current outsourced services include corporate secretary, insurance management, internal audit, IT infrastructure support, payroll, legal advice, accounting and actuarial services.

2.8 Other Material Information There is no other material information to report.

3. Section C – Risk Profile

3.1 Material Risks

The following is a summary of the material risks that arise from the Company's business operations and a description of how the risks are measured. There have been no material changes to material risks during the reporting period.

Underwriting Risk

As the Company only participates in writing collateralized Reinsurance Contracts pursuant to the contractual limits as provided per agreements, the impact of the underwriting risk on the Company's solvency is inherently mitigated. Other risks which remain are mitigated and controlled by compliance with the Company's Underwriting Guidelines and the Underwriting Procedures and Controls.

Investment Risk

The investment of the Company's collateral and its availability to pay claims to policyholders is a material risk to the Company. Such risks are mitigated and controlled by compliance with the Company's Investment Guidelines which require investments into highly liquid assets only.

Credit Risk

As the Company holds material assets within its investment portfolio, credit risk is considered a material inherent risk to the Company. Such risks are mitigated and controlled by compliance with the Company's Underwriting Guidelines and Procedures and Controls and the Company's Investment Guidelines requiring investments into assets of high credit quality.

Operational Risk

Various aspects of operational risks are considered material risks to the Company. These include, in particular, business process risk, compliance risk, information systems risk, fraud risk and outsourcing risk.

As many of the Company's operational matters are outsourced, the Board and Committees monitor the procedures and controls used by the key service providers. Copies of the relevant guidelines and other procedures and controls of the Company have also been furnished to the service providers to ensure their compliance with the same. The Board is satisfied that the operational controls in place with such service providers are adequate to mitigate the operational risk inherent in the Company's business processes.

3.2 Risk Mitigation

As outlined in section 3.1, there are a number of mitigations currently in place for the material risks within the organization.

Where any identified risks have the potential to exceed risk appetite thresholds, a clear course of action focused on the risk issue are initiated, such as a strengthening of the control environment, a reduction in the underlying asset or liability giving rise to the risk, or the adjustment of the risk tolerance following a business review.

- 3.3 Material Risk Concentrations** None to note.
- 3.4 Investment in Assets in Accordance with the Prudent Person Principle**
- The Company's overall investment strategy is to invest conservatively in liquid and secure investments, primarily comprising cash, highly rated money market funds or government securities. The focus is on the preservation of assets, the ability to meet liquidity requirements and asset diversification.
- The Investment Committee meets at least bi-annually and considers the Company's compliance with the Investment Guidelines.
- 3.5 Stress Testing and Sensitivity Analysis**
- As an approved modified filer for the year end 31 December 2020, the Company is exempt from the completing the mandated stress testing usually required for a regulated Class 3A entity. Notwithstanding, the Company has considered the appropriateness of these stress test in the context of completing the CISSA.
- With respect to the underwriting stress scenarios, as all business is written on a fully collateralized basis for both 2020 and 2021, the net impact on solvency of underwriting stress scenarios is not material. For the investment scenarios, the Company currently retains all its assets in cash or cash equivalents and as such is not exposed to material investment risk. These scenarios have been quantitatively assessed for future years (beyond 2021) for potential strategic changes the Company may pursue.
- In addition, the Company has considered some additional specific operational risk stress scenarios which assess the capital buffer to be adequate.
- While the Company acknowledges that operational risk items are the most material risks for solvency under the current operating model, the overall impact of the various stress scenarios is relatively immaterial.
- 3.6 Other Material Information** There is no other material information to report.

4. Section D – Solvency valuation

- 4.1 Valuation Bases, Assumptions and Methods to Derive the Value of Each Asset Class**
- The Company has used the valuation principles outlined by Bermuda Monetary Authority's "Guidance Notes for Commercial Insurers and Insurance Groups' Statutory Reporting Regime" for the reporting period's statutory filing. The economic valuation principles outlined in this document are to measure assets and liabilities on a fair value basis. The fair value principles used for the assets are as follows:
- Cash and Cash Equivalents**
Includes cash time deposits and investments maturing within three months. Cash and cash equivalents are measured at historical cost which is reasonably approximate to fair value.
- Quoted Investments**
Are carried at fair value based on quoted market prices.
- Accounts Receivable and Premium Receivable**
Are recorded at a fair value. Balances due in more than one year have been discounted at the relevant risk-free rate.
- 4.2 Valuation Bases, Assumptions and Methods to Derive the Value of Technical Provisions**
- Pursuant to a direction from the Bermuda Monetary Authority for a modified statutory filing per section 17 of the SAC Act, the Company is exempted in providing the technical provision calculation for the year ended December 31, 2020.
- 4.3 Recoverables from Reinsurance Contracts**
- Recoverables from reinsurance contracts are valued on a GAAP basis.
- 4.4 Valuation of Bases, Assumptions and Methods to Derive the Value of Other Liabilities**
- Similar to the valuation principles for assets, the Company's liabilities follow the valuations principles outlined by Bermuda Monetary Authority's "Guidance Notes for Commercial Insurers and Insurance Groups' Statutory Reporting Regime" which values liabilities on a fair value basis. Other liabilities are valued on a GAAP basis and settlements not expected to be settled within a year are discounted using the prescribed discount rates provided by the Bermuda Monetary Authority as at December 31, 2020. In the absence of an active market, prices are based on observable market inputs.
- 4.5 Any Other Material Information**
- There is no other material information to report.

5. Section E – Capital Management

5.1 Eligible Capital

Capital Management Policy and Process to Determine Capital Needs, how Capital is Managed and Material Changes During the Reporting Period

The primary capital management objectives of the Company are to maintain a strong capital base to support the development of its business and to meet regulatory capital requirements at all times. The Company recognizes the impact on shareholder returns of the level of equity capital employed and seeks to maintain a prudent balance. It strives for an appropriate capital structure that efficiently allocates the risk to the capital.

Eligible Capital Categorized by Tiers in Accordance with the Eligible Capital Rules

The Company's general account is capitalized with USD 1,000 thousand comprising 120,000 voting common shares of par value USD 1 each and USD 880 thousand of contributed surplus.

At the end of the reporting period, the Company's statutory surplus was USD 530 thousand.

The Company's total Eligible Capital, classified entirely as Tier 1 capital, was therefore USD 1,530 thousand at the end of the reporting period.

Eligible Capital Categorized by Tiers in Accordance with the Eligible Capital Rules Used to Meet the Enhanced Capital Requirement (ECR) and Minimum Margin of Solvency

As the Company only participates in writing collateralized reinsurance contracts, the Authority has granted the Company a Minimum Margin of Solvency of USD 1,000 thousand, which is met by the Tier 1 capital of USD 1,530 thousand.

Confirmation that Eligible Capital is Subject to Transitional Arrangements as Required by the Eligible Capital Rules

Not applicable.

Identification of any Factors Affecting Encumbrances Affecting the Availability and Transferability of Capital to Meet the ECR

None.

Identification of Ancillary Capital Instruments Approved by the Authority

None.

Identification of Differences in Shareholder's Equity as Stated in the Financial Statements Versus the Available Statutory Capital and Surplus

There were no significant differences between the GAAP shareholders' equity and the available statutory capital and surplus other than the impact of employing statutory prudential filters to reduce the available statutory capital for prepayments.

**5.2 Regulatory
Capital
Requirements**

The Amount of the ECR and Minimum Margin of Solvency MSM Requirements at the End of the Reporting Period

At the end of the reporting period, the Company's regulatory Minimum Margin of Solvency was USD 1,000 thousand. The Enhanced Capital Requirement was not applicable.

Identification of Any Non-Compliance with the Minimum Margin of Solvency and the ECR

None.

Description of the Amount and Circumstances Surrounding the Non-Compliance, the Remedial Measures Taken and their Effectiveness

Not applicable.

Where the Non-Compliance has not been Resolved, a Description of the Amount of the Non-Compliance

Not applicable.

**5.3 Approved
Internal Capital
Model**

Description of the Purpose and Scope of the Business and Risk Areas where the Internal Model is Used

Not applicable.

Where a Partial Internal Model is Used, a Description of how it is Integrated with the BSCR Model

Not applicable.

Description of Methods Used in the Internal Model to Calculate the ECR

Not applicable.

Description of Aggregation Methodologies and Diversification Effects

Not applicable.

Description of the Main Differences in the Methods and Assumptions Used for the Risk Areas in the Internal Model Versus the BSCR Model

Not applicable.

Description of the Nature and Suitability of the Data Used in the Internal Model

Not applicable.

Other Material Information

None.

6. Section F – Significant Event

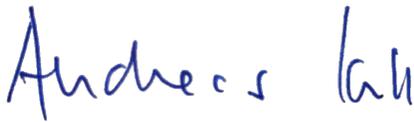
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|---|---|
| 6.1 Description | There are no significant events to report. |
| 6.2 Dates of the Significant Event | Not applicable. |
| 6.3 Impact on Financial Condition Report | Not applicable. |
| 6.4 Other Material Information | There is no other material information to report. |

7. Declaration of Financial Condition Report

We, the undersigned Officers of the Company declare that to the best of our knowledge and belief, the financial condition report fairly represents the financial condition of the Company in all material respects.

A handwritten signature in blue ink, appearing to read "CBieri".

Christian Bieri, CEO

A handwritten signature in blue ink, appearing to read "Andreas Kull".

Andreas Kull, CRO