

## CLASS D AND CLASS C – FILING REQUIREMENTS FOR THE 2019 FINANCIAL YEAR-END

### Filing requirements for the 2019 financial year-end for Class D and Class C (re)insurers

	ITEM	REFERENCES	DETAILS
1.	<b>Statutory Financial Return (SFR)</b>	<ul style="list-style-type: none"> <li>a. Section <b>15 to 18</b> of the Insurance Act 1978 (the Act)</li> <li>b. Insurance Account Rules 2016</li> </ul>	<p>The SFR includes:</p> <ul style="list-style-type: none"> <li>a. Insurer Information Sheet</li> <li>b. Auditor’s report</li> <li>c. Statutory Financial Statements Form 1SFS, Form 2SFS, Form 8SFS (including notes to the unconsolidated financial statements)</li> <li>d. Statutory Declaration of Compliance</li> </ul> <p><b>NOTES:</b></p> <ul style="list-style-type: none"> <li>1. The SFR should be <b>filed within four months</b> after the end of the financial year or such longer period, not exceeding seven months, as the Authority may determine on the application of the insurer.</li> <li>2. The SFR may be reported in the currency the insurer chooses is appropriate.</li> <li>3. If an insurer has no investments in affiliates as reported on line 4 of the unconsolidated statutory financial statements, the insurer may select “No Subsidiaries” in the Company Information tab and complete the amended consolidated BSCR model.</li> <li>4. The Insurer Information Sheet and Statutory Financial Statements are included in the BSCR model and the Authority does not require a separate submission of these.</li> <li>5. Notes are only required for the Unconsolidated Statutory Financial Statements, which are included in Form 1SFS of the BSCR model</li> </ul>
2.	<b>Capital and Solvency Return (CSR)</b>	<ul style="list-style-type: none"> <li>a. Section <b>6A</b> of the Act</li> <li>b. The Insurance (Prudential Standards) (Class C, Class D and Class E Solvency Requirement) Rules 2011</li> <li>c. Insurance (Eligible Capital) Rules 2012</li> <li>d. Section 15A of the Act</li> <li>e. Insurance (Public Disclosure) Rules 2015</li> <li>f. Guidance Note Actuary’s Opinion on EBS Technical Provisions – December 2017</li> </ul>	<p>The CSR includes the BSCR and associated Schedules plus any supporting attachments (or where applicable, an approved internal capital model), specifically:</p> <ul style="list-style-type: none"> <li>a. Capital and Solvency Return Declaration;</li> <li>b. AML Questionnaire – (for direct long-term insurers only);</li> <li>c. Sanctions – (for all insurers);</li> <li>d. BSCR Schedules - Form 4EBS, Schedule II to VIIIA &amp; Schedules XVIII to XXI;</li> <li>e. Commercial Insurer Solvency Self-Assessment (CISSA) – Schedule IX</li> <li>f. Eligible Capital - Schedule XII</li> <li>g. Commercial Insurer Risk Assessment (Operational Risk)</li> <li>h. Schedule of Regulated Non-Insurance Financial Operating Entities – Schedule XVI</li> <li>i. Schedule of Solvency – Schedule XVII</li> <li>j. Financial Condition Report (FCR)</li> <li>k. Actuary’s opinion (on the EBS Technical Provisions)</li> </ul> <p><b>NOTES:</b></p>

			<ol style="list-style-type: none"> <li>1. The CSR may be reported in the currency the insurer deems as appropriate.</li> <li>2. The CSR should be <b>filed within four months</b> after the end of the financial year or such longer period, not exceeding seven months, as the Authority may determine on the application of the insurer.</li> <li>3. <b>Declaration</b> of capital and solvency return should be signed by two <b>directors</b> and the insurer’s <b>principal representative</b>.</li> <li>4. The <b>FCR</b> should be signed by the i) chief executive of the insurer and any ii) senior executive responsible for actuarial or risk management or internal audit or compliance function. <b>The FCR is to be published on the insurer’s website within 14 days of the date the report was filed with the Authority.</b> If an insurer does not have a website, it is to furnish to the public a copy of its latest financial condition reporting within 10 days of receipt of a request made in writing.</li> <li>5. For an insurer to submit an electronic version only, the insurer must submit via the “submit” macro embedded within the BSCR model. To ensure this is working properly, we encourage insurer’s IT department to work with the Authority on the submit functionality prior the submission deadline. Insurers who submit a return via any other method (ie. email) will need to file a hardcopy version as well.</li> </ol>
3.	<b>Updated CSR Calculation for 2019 Year-End</b>	a. The Insurance (Prudential Standards) (Class C, Class D and Class E Solvency Requirement) Rules 2011	<p><b>NOTE:</b> For the 2019 year-end, insurers are required to complete the BSCR based on both the 2018 year-end methodology and the revised 2019 year-end CSR calculation. If an insurer wishes to determine their capital charge based on the revised methodology only, insurers are required to apply for permission via email request to <a href="mailto:RiskAnalytics@bma.bm">RiskAnalytics@bma.bm</a>.</p>
4.	<b>Audited Financial Statements</b>	a. Section 17A of the Act	<p><b>Additional financial statements prepared in accordance with Generally Accepted Accounting Principles (GAAP)</b></p> <p>Such financial statements shall be prepared in accordance with any one of the following standards or principles —</p> <ol style="list-style-type: none"> <li>a. International Financial Reporting Standards (IFRS);</li> <li>b. Generally Accepted Accounting Principles (GAAP) that apply in Bermuda, Canada, the United Kingdom or the United States of America; or</li> <li>c. Such other GAAP as the Authority may recognise.</li> </ol> <p>Every insurer shall file with the Authority a copy of the <b>audited financial statements</b> prepared under this section (together with the notes to those statements and the auditor’s report thereon) <b>within a period of four months</b> from the end of the financial year to which the financial statements relate or such longer period, not exceeding seven months, as the Authority may determine on the application of the insurer.</p> <p><b>NOTE:</b> For the 2016 year-end and beyond, <b>Class C and D insurers</b> may without regulatory approval, submit condensed general purpose financial statements in accordance with any Insurance Account Rules instead of additional GAAP financial statements.</p>

5.	<b>Alternative Capital</b>	a. The <b>Insurance</b> (Prudential Standards) (Class C, Class D and Class E Solvency Requirement) Rules 2011	<p>Alternative Capital is defined as “Insurers that conduct business that is financed by a mechanism other than shareholders’ capital of the (re)insurance company. This may take various forms such as catastrophe (cat) bonds, industry loss warrants, sidecars, collateralised reinsurers, longevity and mortality bond/swaps, hybrid securities such as preference shares, swaps, and contingent capital such as letters of credit, among others.”</p> <p>If insurers have such capital arrangements, insurers are to complete Schedule V(m) of the BSCR model.</p>
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## **Bermuda Long-Term Commercial Insurers**

### **Changes to the 2019 BSCR Model**

Below are the changes from the 2018 to 2019 year-end model for Long-Term insurers:

- 1) Information Sheet – in paragraph (L), included additional questions for Anti-Money Laundering (AML).
- 2) AML Schedule – revised AML schedule for long-term direct insurers.
- 3) Notes to Form 1SFS Line 17 – removed duplicative requirement for details on general business reserves for restricted and unsecured assets that are detailed on Notes to Form 1SFS Line 15.
- 4) Schedule V(e) – Stress / Scenario Tests
  - a. Financial Market Scenario – updated stress scenarios and included new R3 Extreme US Yield Curve Widening;
  - b. Mortgage Loan – updated Mortgage Loan Shock 1 & 2 for scenarios there are capital gains from the shock;
  - c. Cyber Risk – revised cyber risk schedule for inclusion of requested information on a unconsolidated and consolidated basis
- 5) Schedule V(m) – Alternative Capital Schedule – integrated the Alternative Capital Schedule within the BSCR model
- 6) Schedule (L) Segregated Accounts – revised segregated accounts schedule additional information on beneficial ownership details