

Open Protocol Enabling Risk Aggregation

INSURANCE OPEN PROTOCOL

MANUAL

Revised

OCTOBER 2023
Original version: June 2017



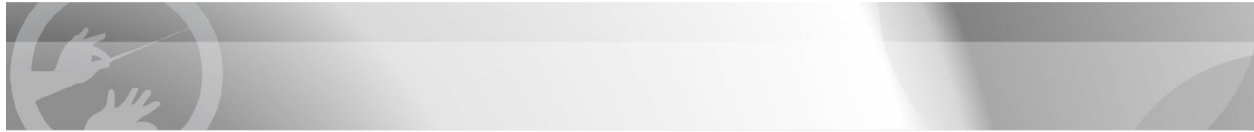
Disclaimer for Documents Supporting Open Protocol For Insurance

Updated versions of the spreadsheets for reporting on Insurance Risk, which have been included as Tabs 15-25 in the Open Protocol Template, were published in October 2023 by the members of the SBAI Insurance Working Group (together and individually, the “Insurance Working Group”). The latest version of the Open Protocol Template is dated October 2023 and this document is a separate Insurance Open Protocol Manual of the same date which describes how these Tabs are to be filled out. This Disclaimer applies to the Template and Manuals as they stood on 6 October 2023 and to every future edition, draft or final, issued by the SBAI (Standards Board for Alternative Investments) Open Protocol Working Groups or its successors and to any use of the material comprised in the Template or Manual. It also applies to any material (“Website Materials”) from time to time on the SBAI website <https://www.sbai.org/> (the “Website”).

The latest Template and Manuals are extensions of the Open Protocol Enabling Risk Aggregation (“OP”) documents that were first launched in 2011 and which are available on the SBAI website at <https://www.sbai.org/>. An updated version on OP was released in 2016 following the addition of Real Estate to Global Industry Classification Standard (GICS), and 2018 following GICS changing Telecommunication to Communication Services. A stand-alone version of the Insurance OP template and manual were first released in June 2017.

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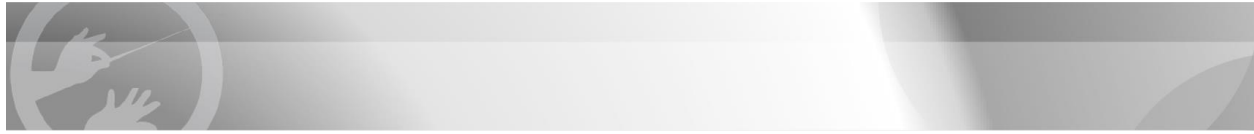
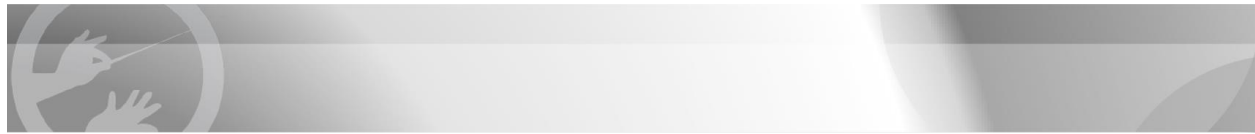


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Introduction

The additional sheets in this version of the Template that relate to Insurance Risk (the Insurance Open Protocol (“IOP”) sheets) have been included into the Open Protocol template and are to be filled out by funds that have a significant exposure to property catastrophe Insurance risk. These additional tabs have been developed because there are several features of property catastrophe exposure that differ significantly from most other exposures of hedge funds. These include terminology, sources of leverage and the wide-spread use of side-pockets and are discussed further below.

If insurance exposure is the only significant exposure taken by the fund, some parts of the OP template will not be filled out, but the information required to enable integration into a portfolio view of risk are contained in Tab 1 of the combined template, and so should be completed by all reporting funds. If there are other significant non-insurance exposures taken by the fund, they are to be reported in Tabs 2-14 of the Template, while Tabs 15-25 deal with Insurance risk. The focus of these Tabs is on Property Catastrophe risk because this is the main type of insurance risk currently written by insurance-linked funds. However, an increasing number of funds are writing a broader range of insurance risks, and the Template is likely to need expansion to cover such exposures in the future.

The main objective of the combined Protocols (OP and IOP) is to provide standardized procedures for the calculation, conveyance, collection, and collation of financial risk information. The protocols serve a dual role of providing more detailed explanation of various exposures in a fund and to enable consistent aggregation of exposures across funds. Where possible we have followed the principles listed below:

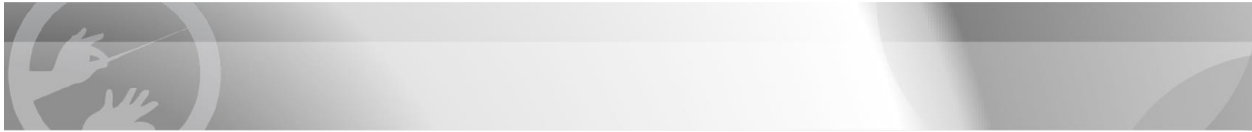
- **Objective:** Protocols avoid subjective areas where possible and provide enough details on methodology to ensure objective calculations.
- **Simple:** Protocols are easy to implement and do not require expensive risk systems to generate.
- **Flexible:** Protocols are flexible, in order to incorporate potential innovations in financial markets.
- **Compatible:** Protocols have incorporated existing standards where available.
- **Comprehensive:** Protocols contain multiple risk analytics to ensure that both investors and regulators are satisfactorily covered.
- **Applicable:** The OP is designed to be applicable to different types of funds, including mutual funds, venture and private funds, separate accounts, and hedge funds, while the IOP is designed to be applicable mainly to Insurance Funds that take Property Catastrophe risk.

The combined OP/IOP materials can be broken down into three sub parts:

The Template: The template now contains an additional 11 Tabs that cover the different metrics that managers are requested to produce on insurance exposure. As before, the template can be provided in two reporting formats; one is an excel template that is reader friendly, and the other is an XML format that is computer friendly.

The new Tabs in the OP/IOP Template are:

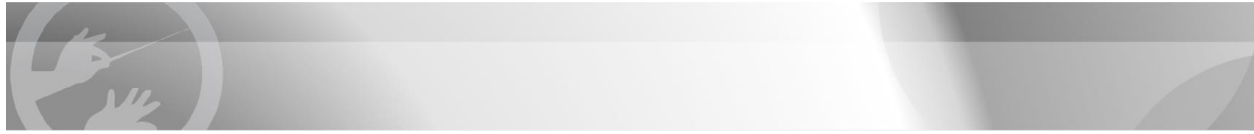
- *Tab 15: Manager Level Data.* Some manager-level information is already collected in Tab 1, but Tab 2 asks for additional information that is relevant to insurance risk, such as AUM by



insurance fund type, investment of Insurance AUM by market, and the percentages of cat bond issues owned in aggregate by the Manager rather than the Fund.

- *Tab 16: Fund Level Data.* Most of the data on exposures of the Fund is collected in this Tab. It is broken down into sections as follows: the value of the On Risk portfolio (i.e., the total value of contracts that are exposed to new events); the liquidity of the Fund's cat bond portfolio; the amount of cash or leverage used in the fund; the distribution of Rate-on-Line and Expected Loss of the contracts written by or on behalf of the Fund; the value of On Risk contracts (see GP 5) between the Fund and fronting parties and the value of On Risk contracts directly with cedants; contingent liabilities of the Fund and investors; currency exposures (other than incurred in the creation of currency share classes); breakdown of the Fund's On Risk contracts by market, by loss trigger type, and by contribution to Expected Loss, CvaR 95 and CvaR 98 by peril/region; sourcing of business; breakdown of cedants by type; renewal information; breakdown of AUM by investor type and geographic location; and breakdown of Fund loss reserves by the events that caused loss.
- *Tab 17: Share Class Level Data.* Perhaps the greatest difference in the IOP approach to that of OP is that data is collected on share classes that are closed to new investment (mainly side-pockets). A typical Investment fund will have two types of share classes: share classes that are open to new investment and share classes that are closed (side-pockets). For IOP reporting we aggregate all open share classes together into a "Main" share class (see GP 2 below) but ask that the IOP Template and Tab 17 be filled out for the Main share class and each side-pocket separately. In Tab 17 we collect AUM on each of the share class, together with a reconciliation of AUM changes from period to period that includes subscriptions and redemptions in the Main share class and flows between side-pockets and the Main share class or directly with investors. We also collect information on the levels of Trapped Collateral (see GP 3 below) and which share classes it is associated with, and a breakdown of the elements of income and expenses for the Main share class and each side-pocket.
- *Tab 18: AEP Curves.* This Tab contains risk data produced by the Manager from applying their proprietary models to the portfolio. The data consists of an Aggregate Exceedance Probability Curve – a form of cumulative probability distribution of possible returns for the fund based on its portfolio – and various statistics derived from the probability distribution of returns.
- *Tabs 19-25 Historic Stress Events.* These Tabs ask for the modelled outcomes for a range of stress tests on the insurance portfolio. These stress tests involve estimating the losses of specified historic events to the current Fund.

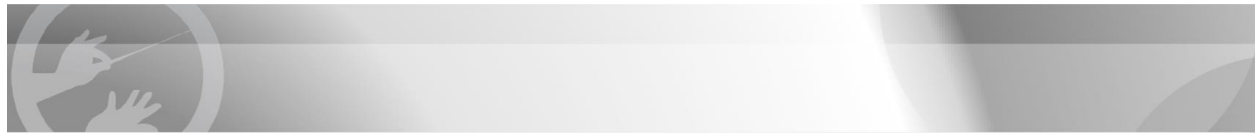
We cannot know how many share classes there will be in an insurance fund in advance, so we ask that the OP/IOP Template is filled out for the Main share class and each side-pocket share class separately (see GP 4 below).



Please do not add, delete, or change any rows, columns, tabs, or headings in the template, as this will disrupt the input of the contents into databases.

Grades: While the OP template includes the option to supply data at several levels of granularity, the IOP Tabs asks for data at just one level of granularity, while Table 1.7 and Table 1.8 include an option to report at different grade levels.

Manual (this document): The OP Manual sets out the general principles and structure of the related protocols and detailed explanations and formulae for every metric and cell identified in the first 14 Tabs in the Template. The IOP manual performs the same function for Tabs 15-25 of the template and follows the same approach to references. Further clarification on the use of the Template and Manuals is available in the FAQs section on the SBAI website (<https://www.sbai.org/toolbox/open-protocol.html>).



General Points

The following General Points provide background to matters that are related to the Insurance focus of the Insurance Tabs in the Template that may arise in multiple Tabs.

GP 1. Reporting by Multi-Strategy Funds that Have Significant Insurance Exposures

We ask that multi-strategy funds with significant Insurance exposures complete both the OP and the IOP Tabs, with the reporting in Tab 1 of both templates being the same. If the fund is entirely invested in Insurance risks, we still ask for Tab 1 to be filled out on a quarterly basis (see below) as it contains data that is required for integrating the fund information into portfolio reporting.

GP 2. Conceptual Approach to Fund Reporting for Insurance Funds

Insurance funds have two main components:

A **pool of assets and liabilities** that includes investments in special purpose insurance companies (transformers) that convert an insurance contract into a financial instrument that a fund can invest in, as well as direct investments in catastrophe bonds, cash and other securities, currency futures and forwards, and receivables and payables.

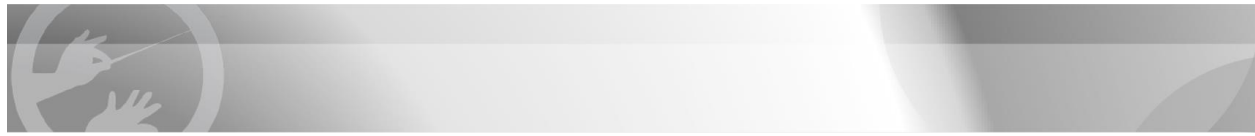
A **set of share classes**, which are typically not separate legal entities but have defined relationships to subsets of the fund pool of assets and liabilities, and varying fee structures and liquidity provisions. They may also be denominated in currencies other than USD, where this exposure is achieved through what we refer to as Targeted Currency Hedging programs (see further below). The assets and liabilities of these Targeted Currency Hedging programs are included in the fund's pool of assets and liabilities, but the outcomes are only associated with the related currency share class.

The share classes are either closed to new investment or open.

Share classes closed to new investment: These are either side-pockets or related structures called "slow pay" share classes (see below) that are owned by differing groups of investors, and each is associated with its own subset of the fund's pool of assets and liabilities. Such share classes are formed when significant valuation uncertainty exists and there is the possibility of unintended transfers of value between investors.

Share classes open to new investment: These share classes can differ in fee structures, liquidity provisions and currency, but are all associated with the same subset of the fund pool of assets and liabilities, and they have the same gross return on AUM (before taking into account fees and Targeted Currency Hedging programs – see below).

Targeted Currency Hedging programs. There are currency hedging programs designed to produce non-USD share classes. For IOP reporting, we do not consider a fund's Targeted Currency Hedging activities as related to its strategy, and so in breakdowns of assets and liabilities or of returns we omit the effects of this activity. However, the outcome of any Targeted Currency Hedging programs is required to reconcile the change in fund or share class AUM over time in Tab 17.



Other Net Currency Exposures. The pool of assets and liabilities of the fund can have currency exposures (for example, from writing insurance contracts in yen or euros), and the manager may seek to manage these. The IOP template tracks the fund’s net currency exposures over time.

Reporting Currency. All information should be reported in USD. Non-USD exposure should be converted to USD using the exchange rate as of the last trading day of the month.

Main share class. As all share classes open for new investment have the same performance at the gross return level, we consolidate them together into what we call the “**Main**” share class for the purpose of breakdown of gross returns in Tab 17. The Main share class will thus include the assets and liabilities of non-USD share classes but not the outcomes of the Targeted Currency Hedging programs associated with these share classes.

To get to a net return for the Main share class, there are several possible approaches for the inclusion of Fees:

- Use the **AUM-weighted average** of the fee levels in each component of the Main share class, using the AUM at the beginning of the Reporting Period (see GP 4 below)
- Use the “**highest**” **fee structure** within the open share classes for the whole of the Main share class.
- Use the **fee structure for the underlying share class with the greatest AUM.**

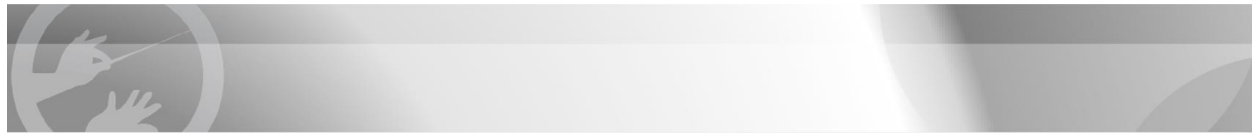
These provide a range of ways of presenting the Main share class performance. The first would be the most consistent with the change in AUM of over time, but the presence of some restricted share classes with, say, zero fees may distort this measure. Regulatory pressure may push a manager to use the “highest” fee structure for reporting performance, but “highest” may not always be well defined if there is a combination of performance fee, hurdles rates and HWM. The fee structure associated with the largest open share class by AUM is operationally simplest. In Tab 17 we ask for this fee information in each of these ways.

Slow Pay share classes. Some managers use a “**Slow Pay**” share class in relation to redemptions when there are no subscriptions, but valuation uncertainty or illiquidity still exists. In such a situation, the manager puts the redeeming shareholders’ share of the Main share class portfolio into a new share class, and this is liquidated as the valuation uncertainty is resolved. For reporting purposes, we treat a Slow Pay share class the same as a side-pocket as it too is closed for new investment.

GP 3. Trapped Collateral

Many collateralized contracts between a cedant and a fund contain agreements that specify how much collateral will be released from trust at the expiry of the contract’s exposure period. Any excess collateral over amounts corresponding to estimated loss reserves that remains in the trust is referred to as **Trapped Collateral**. Such collateral is not available for collateralizing new business.

Assets associated with side-pockets are also not generally available to write new business, and in most circumstances the amount of such assets in side-pockets exceeds the amounts of Trapped Collateral. However, as they result from different considerations (Trapped Collateral arises from agreements between



the manager and cedants, whereas side-pockets are arrangements between the manager and investors) the two are not always linked, and there may be Trapped Collateral associated with the Main share class. We ask for reporting on this in Tab 17.

GP 4. Reporting Dates, Reporting Periods and Reporting Frequency

A **Reporting Date** is the first day of a calendar month. A **Reporting Period** is the time over which aggregate flows are reported or at the end of which a breakdown is reported, and in turn determines the **Reporting Frequency** of these quantities.

The following are the Reporting Frequencies and Reporting Dates of the various Tabs:

Tab	Reporting Frequency	Reporting Dates
15	Quarterly	Jan 1 st , April 1 st , July 1 st , Oct 1 st
16	Quarterly	Jan 1 st , April 1 st , July 1 st , Oct 1 st
17	Monthly	Jan 1 st , Feb 1 st , Mar 1 st , Apr 1 st , May 1 st , June 1 st etc.
18-25	Semi-annual	Jan 1 st , July 1 st

In Tab 17 we ask for information on flows in and out of share classes and a breakdown of returns and reserving to coincide with monthly performance reporting, but breakdowns of exposures in Tabs 15 and 16 are on a **quarterly** basis as this coincides with the ends of important (lumpy) renewal dates for collateralized reinsurance (e.g., 1st January, 1st April, 1st June and 1st July). Tabs 18-25 data produced by modelling information from AEP curves and Stress Tests are collected **semi-annually** after the end of the largest renewals on 1st January and 1st July, with the latter date being just after the start of the annual hurricane season.

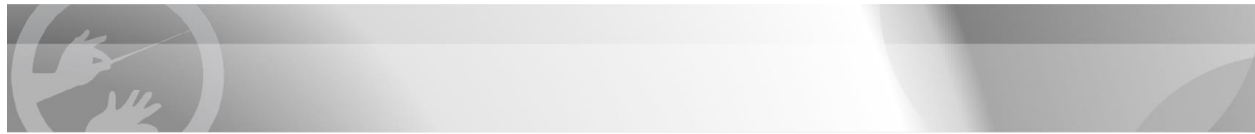
Funds are asked to provide a set of monthly Templates for the Main share class and each Side-pocket, but the data in any Tab that is not due for reporting can contain the prior report’s data.

GP 5. Other Definitions

Long and Short Positions: Risk positions are designated as “**Long**” if they increase the exposure of the reporting entity to insurance risk, and “**Short**” if they decrease exposure to insurance risk. Funds can go short insurance risk if they purchase protection by paying a premium for cover. All **Short exposures** in the template should be captured as **negative** numbers.

AUM and Current AUM: For insurance funds we use a measure of AUM at the start of any calendar month – that is, after redemptions at the end of the previous month and including subscriptions at the start of the current month. This provides a basis for measuring subsequent returns on AUM in the next period, as well as a snapshot after putting new and existing capital to work in renewals/non-renewals and new contracts of the breakdown of the fund AUM at the Reporting Date (“**Current AUM**”).

Contract and Fund Exposures: In most cases we ask for breakdowns of fund exposures in terms of contract value, since this is a measure of how much a fund can lose. Because this value may include the manager’s views on loss reserving, we considered using contract limits as a measure of exposure, but in the presence of any losses the remaining limit will also reflect the manager’s views on loss reserving, so we use contract



value wherever we can. The only exception is the volume of business placed by various brokers with the fund.

On Risk Contracts: Insurance contracts and catastrophe bonds have finite exposure periods, defined by the contract's inception date and the risk period, and they can be "**Off Risk**" either before the exposure period starts or after it ends. In between, they are "**On-Risk**". Such exposures are most likely to be associated with the Main share class but can also be in side-pockets, where a position may have had a loss and so placed in a side-pocket despite ongoing exposures. The IOP measures risk exposures on Reporting Dates for all On Risk contracts in a share class.

GP 6. Fronting and Tail Hedges

Many insurance managers now use one or more rated balance sheets from third parties (which may be affiliated entities) which write insurance contracts on its behalf and pass on the exposure to a fund. This is called "**Fronting**" and the rated balance sheet is called a "**Front**". Fronts are used to get access to a broader range of counterparties, and may be used to generate no-recourse leverage. If the fund pays all losses up to an agreed aggregate amount and the front agreed to pay all further losses, the Front is providing a "**Tail Hedge**" to the fund. For a fee for the Fronting services and the Tail Hedge, the fund gets to keep most of the premium from the fronted portfolio and put up collateral only for the agreed limit maximum it is liable to pay. In most cases, the result is a noticeable increase in the expected return on collateral, so that the Tail Hedge provides a source of non-recourse leverage.

With the Tail Hedge in place, the risk/return profile of the fund can be quite different from that of the portfolio of risks written by the Front. For example, a high yielding portfolio can be constructed from a Fronted portfolio of high attachment, low yielding contracts using a Tail Hedge. The trade-off for the fund's higher expected return is a greater probability of a large downside.

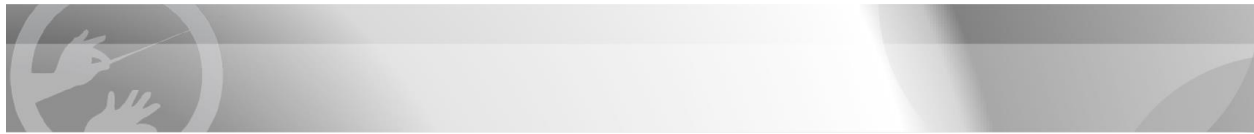
To understand more about where the fund operates (in which markets and at what attachment points) and the resulting risk exposures it has, we collect information on what is written with cedants (possibly through fronts) which we refer to as "**Cedant Level**" data, and on the net exposures of the fund ("**Fund Level**" data).

GP 7. Reinstatements and Rates-on-Line

Non-rated Insurance funds are unlikely to directly write contracts with **automatic reinstatements** as they are capital inefficient. However, they can be written into fronted portfolios. In Tab 16, for exposure breakdowns at the Cedant Level only the value of the contract's first limit is counted.

For calculating **Rate-on-Line** ("ROL") we also only take the initial premium in relation to the first limit into account. For contracts of less than twelve months, the annualized ROL is calculated as the actual ROL divided by the proportion of the annual risk exposure contained within the contract period. Thus, for example, the annualized ROL for a contract exposed to Atlantic Hurricane from June to December would be the same as the contract's actual ROL, since all the annual risk occurs during the contract's six months.

GP 8. Risk Modelling and AEP Curves



In Tab 18 we ask for risk modelling using the proprietary models used by most managers. Managers calculate the range of possible return outcomes for a fund and the related probabilities using a combination of third-party and internal models. In most cases, this modelling involves modifications that result in a “house” view of risk, with each manager adjusting exposure inputs and risk outputs (often by adding risk loadings) and often using proprietary event sets for certain types of events. This may make it more difficult to compare modelled risk data provided by different funds, or to consolidate fund risk information into a portfolio view. However, most Manager’s “view-on-risk” is more conservative than the results from using third-part models without adjustments.

Nevertheless, we ask for the modelled risk profile of a fund in the form of an Aggregate Exceedance Probability (“EP”) curve that maps, for example, a level of return against the probability of having returns exceeding that level over a given period (usually one year). These curves require a set of assumptions which we specify in Tab 18.

We also ask managers to run their models for a set of historical events (“Stress Tests”) to provide a set of outcomes over a common event set that can be used to create a partial picture at a portfolio level, as set out in Tabs 19-25.

GP 9. Breakdown of Returns by Share Class and History of Reserving by Event

We ask for a detailed breakdown of monthly returns in Tab 17 for the Main share class and each closed-ended share class (side-pocket or “slow pay” share class). This breakdown identifies valuation changes from identifiable events, the pattern of income recognition and the extent to which the funds earn trading income from their catastrophe bond holdings.

In Tab 16 we also ask for a breakdown of current loss reserves at the fund level by event, which allows us to track the evolution of these loss reserves over time.

GP 10. Other General Matters

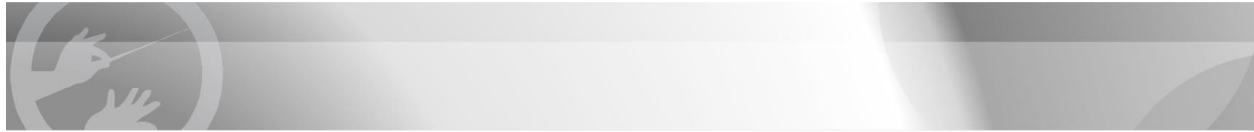
Memo Items: These are usually requests for further information or detail relating to some part of a table or background information.

Comments: These are opportunities for you to identify where definitions could result in a number you may consider misleading; in which case you can use the Comments cells to set out your concerns. You can also use these cells for any other footnotes or explanations. Please enter the table or cell number that the comment is referring to under the “Number” column and then enter the comment in the “Comment” cell. If the comment is general and not specific to any cell, then leave the “Number” column blank.

Reporting Numbers and Rounding: Please round half up.

The Template requires various types of values to be entered and the following is a rough guide:

- All % values should be reported with a percentage sign or as a decimal (here a maximum of 3 decimal places). For example, a 9.355% holding should be reported as 9.4% or 0.094 but not 9.4.
- Numerical cells should not contain text – i.e., do not put dashes or ‘n/a’ in any cells. If a cell is not applicable just leave it blank.

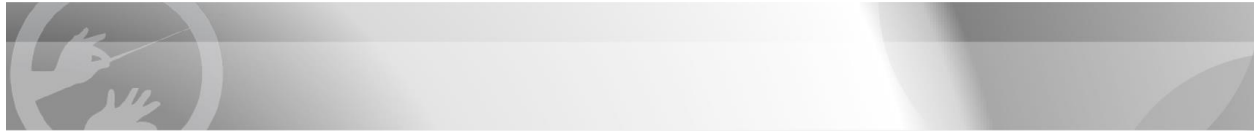


- All AUM numbers should be reported to the nearest integer. Report the actual amount in USD and do not use any text like “m” or “million” in these fields.
- Dates should be formatted DD/MM/YYYY, e.g., 08/08/2021, not 8/8/2021.

Input cells: Input cells are formatted in pink, or light grey for comments.

The FSA Questionnaire: The **FSA Questionnaire** referred to in some later sections of the Manual is the FSA Hedge Fund Survey dated September 2010.

Disclaimer: The Template contains a tab called “Manager Disclaimer” and is left blank. Managers can use this Tab to insert their own disclaimer if they wish and use this Tab for any other comments. Note that the disclaimer and additional comments should be entered in the cells and not in a textbox.



The following entries describe in more detail what is asked for in the Insurance Tabs of the OP/IOP Template.

Tab 1. Fund and Investor details

This Tab is to be filled out for all types of funds and the data collected in this Tab can be aggregated up into a portfolio view for more than one fund.

1.1 Fund Name, Base Currency and Date

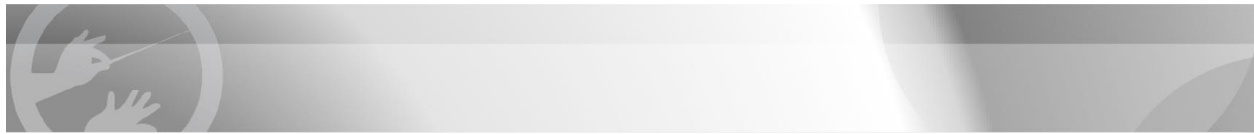
Report the name of the fund, its base currency and the Reporting Date (GP 4) to which the report corresponds.

- **1.1.1 Fund Name**
- **1.1.2 Base Currency**
- **1.1.3 Reporting Date**

1.2 Manager Details

This section should be used to provide information about the investment management company (Advisory Firm) which is responsible for running the fund.

- **1.2.1 Investment Manager Name**
- **1.2.2 Total Firm Assets Under Management:** Total Assets under management for the investment manager, including deferred fees in USD. Please provide total assets under various fund structures:
 - **1.2.2.1 Private Funds (performance fees):** Private funds which charge performance fees under normal circumstances.
 - **1.2.2.2 Private Funds (no performance fees):** Private funds which do not charge performance fees. Mutual funds would be included in this section.
 - **1.2.2.3 Non-Private Funds:** Non-Private funds (Mutual funds, etc.) should be included here.
 - **1.2.2.4 UCITS Funds (performance fees):** A UCITS fund is, as defined in the FSA Questionnaire, “a collective investment scheme/undertaking which requires authorization pursuant to the UCITS Directive.” This section is applicable for UCITS funds that charge performance fees under normal circumstances.
 - **1.2.2.5 UCITS Funds (no performance fees):** A UCITS fund is, as defined in the FSA Questionnaire, “a collective investment scheme/undertaking which requires authorization pursuant to the UCITS Directive.” This section is applicable for UCITS funds that do not charge performance fees.
 - **1.2.2.6 Managed Accounts:** Segregated portfolios or funds which generally replicate a private fund as much as possible for the benefit of a specific investor or investors.
 - **1.2.2.7 Real Estate Fund:** Private funds that primarily invest in real estate and/or real estate related assets.
 - **1.2.2.8 Private Equity Fund:** Closed end private fund which invests in non-publicly traded assets and where the investor has no discretionary redemption rights.



- **1.2.2.9 Liquidity Fund:** Liquidity funds are, as defined by SEC, any private fund that seek to generate income by investing in a portfolio of short term obligations in order to maintain a stable net asset value per unit or minimize principal volatility for investors.
- **1.2.2.10 Other:** Any assets under management in the firm not included in sections 1.2.2.1 to 1.2.2.9 above.

1.3 Strategy AUM Details

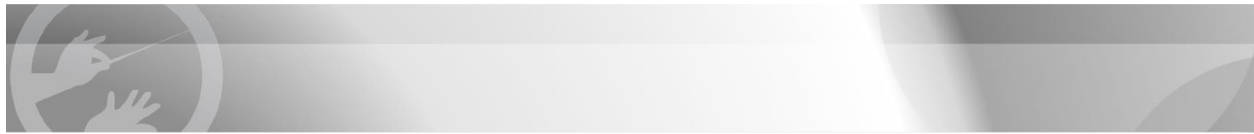
This section is used to provide information about the strategy of the fund under consideration.

- **1.3.1 Total Strategy Assets Under Management:** (see note GP 5) Total assets under management in the entire fund and all other structures following the same investment strategy, including deferred fees, in USD. Please note the entries until 1.3.2 should reconcile with this point.
- **1.3.2 Method Used to calculate AUM:** (See note GP 5) To be consistent with AUM numbers provided elsewhere in the IOP Template, the method for AUM calculation should be Forward Looking. Choose from the drop-down box one of three options: GAAP, Backward Looking, and Forward Looking.
 - **1.3.2.1 Redemption (End of current month):** Redemptions effective as of the last day of the Reporting Period (GP 4) from all entities within the strategy.
 - **1.3.2.2 Subscription (Start of next month):** Subscriptions effective as of the Reporting Date (GP 4) in all entities within the strategy.
 - **1.3.2.3 Funds:** Total strategy assets under management in funds rather than Managed Accounts. Include all share classes. Consider any redemption effective during the Reporting Period and any subscriptions effective on the Reporting Date.
 - **1.3.2.4 Managed Accounts:** Total assets under management in all managed accounts following the same or similar strategy as the reported fund.
 - **1.3.2.5 Other:** Any assets under management in the fund being reported which are not included in sections 1.3.2.3 and 1.3.2.4 above. Other also includes advisory business and portfolio management for portfolios run similarly to the fund being reported.

1.4 Primary Investment Strategy

This section should be used to describe the primary investment strategy followed by the fund from the drop-down lists provided. We indicate the selection for a fund whose primary strategy is Property Catastrophe insurance in each sub-sector below.

- **1.4.1 Investment Strategies:** For an Insurance fund, please select “Other” from the drop down list.
- **1.4.2 Asset Class:** For an Insurance fund, please select “Insurance” from the drop down list.
- **1.4.3 Instruments:** For an Insurance fund, please select “Securities and Derivatives” from the drop down list.
- **1.4.4 Investment Style:** For an Insurance fund, please select “Not Applicable” from the drop down list.
- **1.4.5 Trading Strategy:** For an Insurance fund, please select “Not Applicable” from the drop down list.
- **1.4.6 Market Exposure:** For an Insurance fund, please select “Long Bias” from the drop down list.



- **1.4.7 Average Holding Period:** For an Insurance fund, please select “Multiple” from the drop down list.

1.5 Reporting Share Class (RSC)

This section is applicable only if a manager wishes report performance at the share class level rather than the fund level. For an Insurance Fund, this section should be left blank as the relevant information here is captured in Sheet 17.

The reporting share class should be most representative share class if the fund has multiple share classes. If this section is filled in, then performance in 1.6 will be assumed to be at the RSC level. **1.5.1 Total Investment in RSC:** Total assets under management in the reporting share class, including deferred fees in USD.

- **1.5.2 % of total fund AUM in RSC:** Percentage of total fund AUM in the share class on which the information in the report is based.
- **1.5.3 Currency:** If the official currency of the RSC is not USD, please fill in the official currency here. All AUM and exposure information should be reported in USD.
- **1.5.4 Inception date of the RSC:** Inception date for reporting share class.
- **1.5.5 Management Fee of RSC:** Percentage management fee charged on reporting share class. Use as many decimal places as required.
- **1.5.6 Performance Fee to RSC:** Percentage performance fees charged on reporting share class. Use as many decimal places as required.

1.6 Performance

If completed, this section 1.6 should contain the best available estimate if the performance is not finalized.

For an Insurance fund, the information reported here should be for the share class that is reported in more detail in Sheet 17.

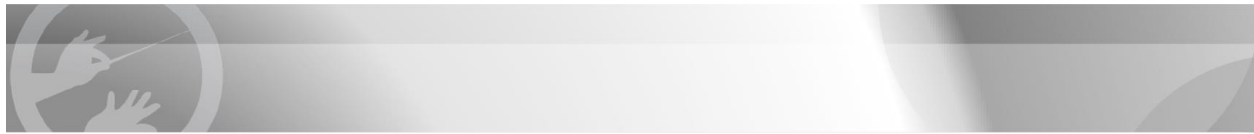
Gross Performance

Performance gross of management and performance fees and other expenses. Performance should be rounded to two decimal places (round half up).

- **1.6.1 Month:** Gross performance for the month (non-annualized)
- **1.6.2 QTD:** Gross performance for the quarter to date, the quarters being January to March, April to June, July to September and October to December (non-annualized)
- **1.6.3 YTD:** Gross performance for the calendar year to date (non-annualized)
- **1.6.4 ITD (annualized):** Gross performance from the fund/RSC since inception to date (non-annualized if inception is less than 12 months ago, annualized if inception was more than 12 months ago)

Net Performance

Performance net of management and performance fees and other expenses. Performance should be rounded to two decimal places (round half up).



- **1.6.5 Month:** Net performance for the month (non-annualized)
- **1.6.6 QTD:** Net performance for the quarter to date, the quarters being January to March, April to June, July to September and October to December (non-annualized)
- **1.6.7 YTD:** Net performance for the calendar year to date (non-annualized)
- **1.6.8 ITD (annualized):** Net performance from the fund/RSC since inception to date (non-annualized if inception is less than 12 months ago, annualized if inception was more than 12 months ago)

High water mark

- **1.6.9 Is majority of fund above the HWM:** Is the majority of the fund or reporting share class above the HWM in the reporting month.

1.7 Investor Breakdown

Report the values as a percentage of total AUM and actual USD amount. AUM should exclude undrawn commitments.

- **1.7.1 Top 5 Largest Investors:** Percentage of total fund AUM held by the 5 largest investors. Note that investments by individual employees should be included in “Top 5 Largest Investors” if applicable and would be classified as “Individuals”. This section may be reported following the same guidance provided in form PF. For example:

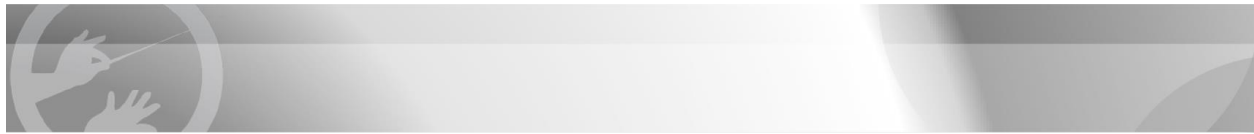
Investor	% of AUM
ABC Pension Fund	15.0%
XYZ Pension Fund	10.0%
AZ Bank	15.0%
Employee A	12.5%
Employee B	5.0%
HNW A	15.0%
HNW B	12.5%

If HNW A controls AZ Bank, these would be grouped together. That would result in a total of 80% for top 5:

1. HNW A + AZ Bank: 30%
 2. ABC Pension Fund: 15%
 3. Employee A: 12.5%
 4. HNW B: 12.5%
 5. XYZ Pension Fund: 10%
- **1.7.1.1 Largest Investor:** Percentage of total fund AUM held by the largest investor.

Investor Type (by % and Dollar Amount)

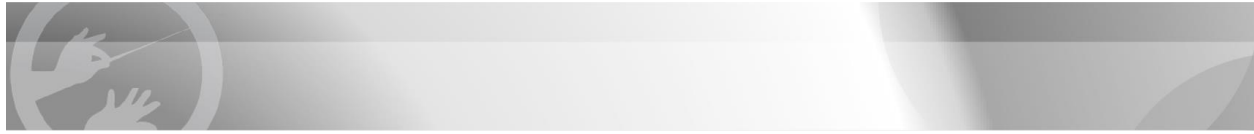
This should be the breakdown of fund AUM by investor type as defined by the investors themselves or deemed most appropriate by the manager.



- **1.7.2 Individuals:** Total AUM held by individuals like Partners, Employees and High Net Worth Individuals.
 - **1.7.2.1 Partners & Employees:** As the FSA Questionnaire states in note 17, “include all types of staff of the investment manager and/or sub-managers. Do not include investments by related corporate entities including financial institutions. Include investments through the pension plans/funds of the staff.” Also, include here any deferred fees if still invested in the fund.
 - **1.7.2.2 High Net Worth Individuals:** As the FSA Questionnaire states in note 17, “do not include any investments by (Partners and Employees). Include HNW that invest into the fund via platforms and intermediaries where known.”
 - **1.7.2.3 Family Office:** Include both single and multi-family offices in this section.
 - **1.7.2.4 Retail investors:** Include any investments from individuals which do not qualify for “High Net Worth Individuals” status.
- **1.7.3 Institutional:** Total AUM held by institutions like Government entities, Pension Plans, and Endowments/Foundations.
 - **1.7.3.1 Government entities:** As the FSA Questionnaire states in note 17, “include any state pension plans/funds in this category.”
 - **1.7.3.2 Pension plans/funds:** As the FSA Questionnaire states in note 17, “do not include state or government pension plans/funds, and do not include pension plans/funds by Partners and Employees.”
 - **1.7.3.3 Endowments/foundations and other charitable organisation:** As the FSA Questionnaire states in note 17, “include investments by endowments, foundations and charitable organizations”.
 - **1.7.3.4 Sovereign Wealth Funds:** Include investments by state-owned investment funds capitalized by governments.
- **1.7.4 Intermediaries:** Total AUM held by financial intermediaries like Banks, Fund of Funds, and Private banks.
 - **1.7.4.1 Banks & Insurance companies:** As the FSA Questionnaire states in note 17, “refers to balance sheet exposures by these entities to the fund”.
 - **1.7.4.2 Other Investment Funds:** As the FSA Questionnaire states in note 17, “Include investments by Fund of funds and other investment funds”.
 - **1.7.4.3 Private Banks:** Where possible, allocate exposures that are organized through private banks to the underlying source (e.g., to HNW if applicable). Only report investments here if it is not possible to allocate or identify the underlying source.
- **1.7.5 Other/Unknown:** Include any source not covered above or if the source is unknown or unidentifiable.

1.8 Investor Liquidity

This section in the OP allows a manager to report at various grade levels (see Introduction). However, for an insurance fund we ask that the information be reported at Grade 2.



The breakdown of the AUM by liquidity of the investor should be based on when an investor would be able to redeem (cease having exposure in the fund), both with and without penalty, within different periods.

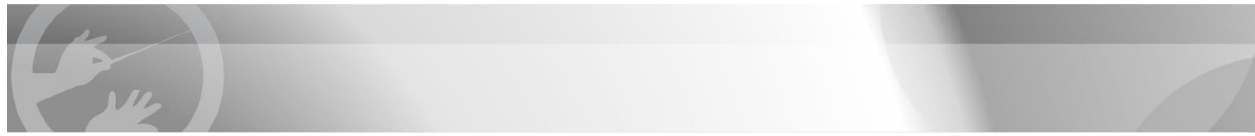
Consider, for example, an investor, who is invested 10% of the total fund AUM, is hard locked for three months, and then has a soft lock for a further three months. Since the investor would be able to pay a penalty and redeem at the end of three months and be able to redeem without a penalty at the end of 6 months, report:

Within next	Without Penalty	Additional With Penalty
Grade 1 Grade 2		
Less than or equal to 3 Months		10%
Less than or equal to One Week		
Less than or equal to One Month		
Less than or equal to Three months		10%
Less than or equal to 12 Months	10%	
Less than or equal to 6 Months	10%	
Less than or equal to 9 Months		

“Additional with Penalty” column would be empty if the fund does not have any investors with early redemption penalties.

For this section assume notice periods and gates are imposed where applicable. The Without Penalty column, including Side Pockets, should add to 100%, but the With Penalty column need not sum to 100%. For each reporting date, assume that 100% of the investor base has requested liquidity.

- **1.8.1 Less than or equal to 3 Months**
 - **1.8.1.1 Less than or equal to One Week**
 - **1.8.1.2 Less than or equal to One Month**
 - **1.8.1.3 Less than or equal to Three months**
- **1.8.2 Less than or equal to 12 Months**
 - **1.8.2.1 Less than or equal to 6 Months**
 - **1.8.2.2 Less than or equal to 9 Months**
 - **1.8.2.3 Less than or equal to 12 Months**
- **1.8.3 Less than or equal to 36 Months**
 - **1.8.3.1 Less than or equal to 18 Months**
 - **1.8.3.2 Less than or equal to 24 Months**
 - **1.8.3.3 Less than or equal to 36 Months**
- **1.8.4 More than 36 Months**
- **1.8.5 Side-Pockets:** Assume all assets held under side pockets to be “without penalty” and Investments under side-pockets should be fairly valued.



1.9 Unencumbered Cash

- **1.9.1 Unencumbered Cash:** Report percentage of total AUM held in unencumbered cash. Note that unencumbered investments in money market funds should be included. The PF form definition of unencumbered and the Financial Conduct Authority (FCA) handbook definition of near cash can be used as guidelines.

PF form: The fund's cash and cash equivalents plus the value of overnight repos used for liquidity management where the assets purchased are U.S. treasury securities or agency securities minus the sum of the following (without duplication):

- a. cash and cash equivalents transferred to a collateral taker pursuant to a title transfer arrangement; and
- b. cash and cash equivalents subject to a security interest, lien or other encumbrance (this could include cash and cash equivalents in an account subject to a control agreement).

FCA: money, deposits or investments which, in each case, fall within any of the following:

- a. money which is deposited with an eligible institution or an approved bank in:
 - i. a current account; or
 - ii. a deposit account, if the money can be withdrawn immediately and without payment of a penalty exceeding seven days' interest calculated at ordinary commercial rates;
- b. certificates of deposit issued by an eligible institution or an approved bank if immediately redeemable at the option of the holder;
- c. government and public securities, if redeemable at the option of the holder or bound to be redeemed within two years;
- d. bills of exchange which are government and public securities;
- e. deposits with a local authority of a kind which fall within paragraph 9 of Part II of the First Schedule to the Trustee Investments Act 1961, and equivalent deposits with any local authority in another EEA State, if the money can be withdrawn immediately and without payment of a penalty as described in (a).

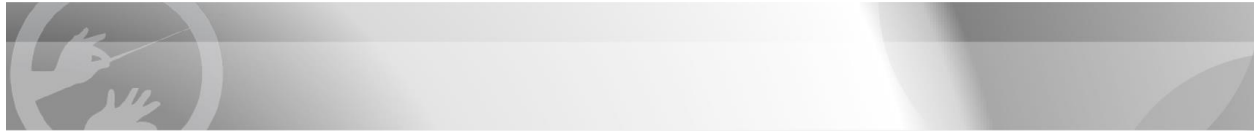
1.10 Investment in External Funds

If the fund has made investments in external funds (include funds run by the same manager), and exposure of those funds is not included in this report, then report percentage of total AUM in external funds broken down by the main motivation in this section.

- **1.10.1 For cash management:** For cash management purposes (e.g., money market funds). Note that if the money market fund is run internally, the securities should be reported on tab 3 or 4 according to the types of securities held, and NOT reported here.
- **1.10.2 Non-cash management:** For non-cash management (i.e., investment) purposes.

1.11 Report Generated By

- **1.11.1 Name:** Name of the entity (manager, administrator, risk systems etc.) that generated the report.

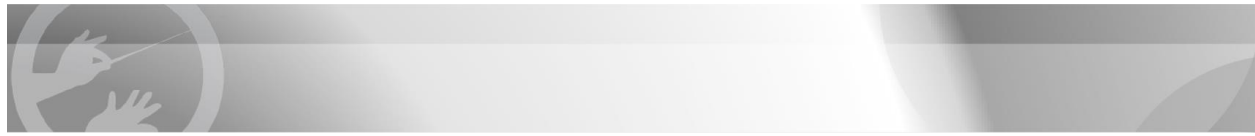


1.12 Report Generation Date

Date: Date (DD-MMM-YY) when the report was generated

1.13 Comments

Please provide any necessary comments with reference to the table or Manual number.



Tab 15. Insurance Manager Level Data

15.1 Manager Insurance AUM by Fund Type

Further to the information on Manager AUM in Table 1.2, we ask for the manager-level **Insurance** AUM and the number of funds by certain fund types to get a measure of the extent of the manager's insurance underwriting activities.

- **15.1.1 Commingled open-ended funds**
- **15.1.2 Interval funds:** Funds registered on a US exchange under the interval Fund regulations that repurchase shares from investors at prescribed intervals.
- **15.1.3 1-year closed-ended funds:** Closed-ended non-listed one-year funds, including sidecars written annually or semi-annually, with annual re-subscription and no discretionary redemption rights.
- **15.1.4 Other closed-ended funds:** Any other closed end non-listed fund with a fixed multi-year maturity for all investors.

15.2 Manager Total Long Insurance Investment Value by Market

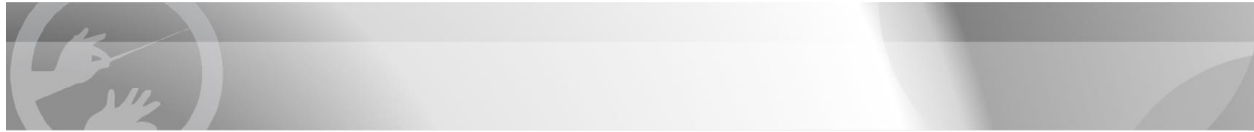
We ask for information on the manager's total activity in the various insurance and reinsurance markets. Different risk markets within insurance have differing price dynamics as the suppliers of capital are not homogeneous across these markets. This information allows us to understand how the main markets in which the fund is active change over time.

We measure the activity in each market as the total value of insurance contracts by type of market. For each market, we ask for total value Short as well as Long. We ask for this information on a Fund Level and a Cedant Level basis (see GP 6). Quota share agreements that are not Fronted or part of a Fronting arrangement are classified as either reinsurance or retrocession depending on whether the counterparty is an insurance or reinsurance company, and the value is that of the quota share itself and not of the underlying contracts.

Other than for catastrophe bonds, Short positions are where cover has been purchased. If the cover is provided by a reinsurer or a fund, it should be classified as reinsurance, if it is provided by a retrocessionaire, it should be classified as retrocession.

We also ask for the total value of contracts written with an aggregate limit or sub-limit.

- **15.2.1 Primary Insurance:** Business accessed directly, via an MGA or other delegated authority (but not via quota share).
- **15.2.2 Reinsurance Excess of Loss:** Long value includes Excess of Loss contracts that are written with insurers, while Short value includes contracts written by reinsurers.
- **15.2.3 Reinsurance Quota Share:** Long value Includes quota shares of primary insurance books while Short value includes contracts written with reinsurers.
- **15.2.4 Retrocession Excess of Loss:** Long value includes Excess of Loss contracts that are written with reinsurers while Short value includes contracts written with retrocessionaires.
- **15.2.5 Retrocession Quota Share or Sidecar:** Long value includes quota shares or sidecars of reinsurers, while Short value includes contracts written by retrocessionaires.



- **15.2.6 Industry Loss Warranties:** Contracts whose main trigger is an index of Industry Loss. Please also include any pure parametric contracts.
- **15.2.7 Rule 144A Catastrophe Bonds:** Cat bonds that accord with Rule 144A and thus can have a secondary market.
- **15.2.8 Private Catastrophe Bonds:** Cat bonds that do not accord with Rule 144A and do not have a secondary market.
- **15.2.9 Hybrid/Enterprise Covers:** Long value includes contracts written by the fund that cover risks in more than one of the insurance, reinsurance or retrocession markets.
- **15.2.10 Memo: Contracts with an aggregate limit/sub-limit:**

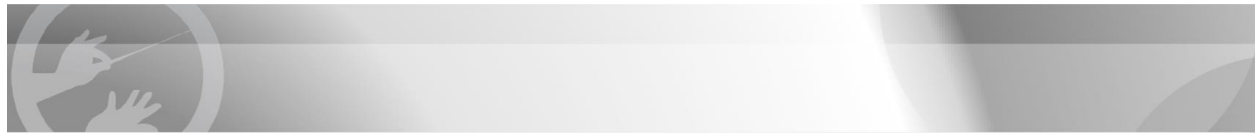
15.3 Rule 144a Catastrophe Bonds: Amount Owned by Manager by Percentage of Issue Size (Face Value)

We ask for the value of the Manager's holdings of 144a cat bonds in each of the following buckets, which are defined by the percentage that the manager's holdings of a given bond represent of the outstanding issuance of that bond.

- **15.3.1 Less than 5% of outstanding issuance**
- **15.3.2 5% to 10% of outstanding issuance**
- **15.3.3 10% to 20% of outstanding issuance**
- **15.3.4 20% to 50% of outstanding issuance**
- **15.3.5 50+% of outstanding issuance**

15.4 Comment

Please provide any necessary comments with reference to the table or Manual number.



Tab 16. Risk Information at Fund Level

16.1 Report Information

- **16.1.1 Fund inception date:** The date the fund started trading.
- **16.1.2 Total Insurance AUM**

16.2 Value of all On Risk Contracts

See GP 5 for the definition of On Risk contracts. Please complete this section on a Cedant Level basis (GP 6).

- **16.2.1 Value of all Long On Risk Contracts:** To be reported for both the Fund and the Main share class.
- **16.2.2 Value of all Short On Risk Contracts:** To be reported for both the Fund and the Main share class.

16.3 Rule 144a Catastrophe Bonds: Amount Owned Directly or Indirectly by Fund by Percentage of Issue Size (Face Value)

We wish to determine how much of a fund's investment in catastrophe bonds is in issues where the fund's holding represents a significant part of the total amount of that bond's outstanding issue size, as this is likely to influence the liquidity of these positions.

We ask for the face values of the fund's holdings of catastrophe bonds divided into the following "buckets" for Long and for Short positions:

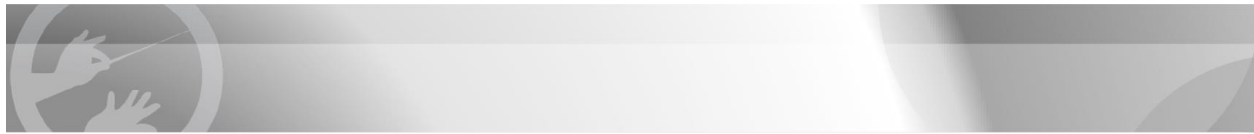
- **16.3.1 Less than 5% of outstanding issuance**
- **16.3.2 5% to 10% of outstanding issuance**
- **16.3.3 10% to 20% of outstanding issuance**
- **16.3.4 20% to 50% of outstanding issuance**
- **16.3.5 50+% of outstanding issuance**

16.4 Cash and Borrowing Lines Available to Fund

Restricted cash consists of cash in trusts and in side-pockets. We ask for the amount of unrestricted cash in the Main share class (GP 2). Catastrophe bonds without losses whose exposure period has expired but which have not yet been redeemed are also considered a form of cash investment.

We also ask for the amount of uncommitted and committed recourse borrowing limits available to the fund, whether currently used or not. For committed lines, please report the weighted average maturity of those commitments in days. Please also report the number of independent providers of borrowing facilities.

- **16.4.1 Unrestricted cash balances in Main share class (USD)**
- **16.4.2 Long Off Risk contracts (see GP 5) in Main share class (GP 2, USD)**
- **16.4.3 Committed borrowing facilities (USD):** These are "with recourse" borrowing facilities.
- **16.4.4 Weighted average maturity of outstandings (days)**
- **16.4.5 Non-committed borrowing facilities (USD):** These are also "with recourse".



- **16.4.6 Number of independent providers of borrowing facilities (#)**

16.5 Values of Long On Risk Contracts by Initial Rate-on-Line

Rates-on-Line reflect the degree of risk in a contract. Also, as premiums can be used as collateral, they provide a form of “first loss” non-recourse leverage, and higher rates-on line provide higher amounts of this type of leverage.

We ask for information on the distribution of the Fund’s On Risk contracts by annualized ROL (GP 7) at the date of inception for both Long and Short positions (GP 5) existing as of the Reporting Date. The total values are to be reported both on a Fund Level basis and a Cedant Level basis (GP 6).

We assign an ROL of 0% to contracts whose exposure period has expired but which have not been commuted.

The following are the bands of ROL we ask for total values to be reported, and the top end of each band is inclusive:

- **16.5.1 0%**
- **16.5.2 0.0%-2.5%**
- **16.5.3 2.5%-5.0%**
- **16.5.4 5.0%-7.5%**
- **16.5.5 7.5%-10.0%**
- **16.5.6 10.0%-12.5%**
- **16.5.7 12.5%-15.0%**
- **16.5.8 15.0%-17.5%**
- **16.5.9 17.5%-20.0%**
- **16.5.10 20.0%-25.0%**
- **16.5.11 25.0%-30.0%**
- **16.5.12 30.0%-35.0%**
- **16.5.13 35.0%-40.0%**
- **16.5.14 40.0%-45.0%**
- **16.5.15 Greater than 45%**

16.6 Values of Long On Risk Contracts by Initial Expected Loss

Contract ROL and Expected Loss are related, but managers may differ in which they target. The comparison between ROL and Expected Loss also provides an indication of pricing levels in the market. We ask for the values of contracts in various buckets of Expected Loss at the date of inception for both Long and Short positions (GP 5) existing as of the Reporting Date. The total limits are to be reported both on a Fund Level basis and a Cedant Level basis (GP 6).

The following are the bands of EL; the top end of each band is inclusive:

- **16.6.1 0%**
- **16.6.2 0.0%-1.5%**
- **16.6.3 1.5%-3.0%**

- **16.6.4 3.0%-4.5%**
- **16.6.5 4.5%-6.0%**
- **16.6.6 6.0%-7.5%**
- **16.6.7 7.5%-9.0%**
- **16.6.8 9.0%-10.5%**
- **16.6.9 10.5%-12.0%**
- **16.6.10 12.0%-13.5%**
- **16.6.11 13.5%-15.0%**
- **16.6.12 15.0%-16.5%**
- **16.6.13 16.5%-18.0%**
- **16.6.14 18.0%-19.5%**
- **16.6.15 19.5%-21.0%**
- **16.6.16 21.0%-22.5%**
- **16.6.17 22.5%-25.0%**
- **16.6.18 Greater than 25%**

16.7 Fronting

We wish to measure the extent to which the Fund uses a Front (GP 6), and which of these arrangements include a stop-loss or Tail Hedge from the Front to provide another form of non-recourse leverage.

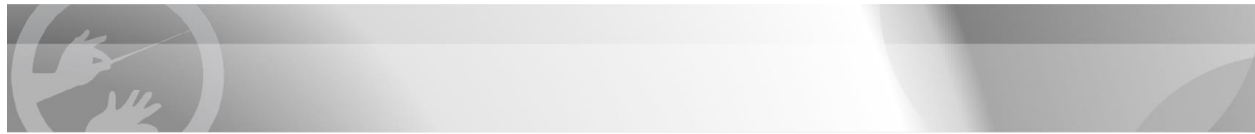
We ask for the total Long and Short values of contracts in the underlying Fronted portfolios, and the number of such Fronted portfolios. Ideally, we would like to receive the values of contracts, but if this is not possible, the remaining limit less unearned premium may be substituted. We also ask for the corresponding value of all collateral provided in trust to the Front's companies under the Fronting arrangements.

- **16.7.1 Value of On Risk contracts in Fronted portfolios**
- **16.7.2 Total value of collateral in trust supporting Fronted portfolios**
- **16.7.3 Value of On Risk contracts not Fronted**
- **16.7.4 # Fronted portfolios**
- **16.7.5 # Fronting carriers**
- **16.7.6 # Fronting carriers who also provide a Tail Hedge**

16.8 Ongoing and Contingent Liabilities

Contracts with less than full collateralization can represent a source of contingent liability to the fund. Also, in some cases, investors who have fully redeemed may have contingent liabilities to make further payments to the fund.

- **16.8.1 Total limits of Long Off Risk but uncommuted contracts net of associated collateral:** Please report the difference between the sum of limits of uncommuted Long contracts and the total of associated collateral.
- **16.8.2 Do redeemed investors have a contingent liability to the fund? (Y/N)**



16.9 Currency Exposure

Insurance-linked funds have both actual and contingent currency exposures. The actual currency exposures are those of the assets and liabilities on the balance sheet, while the contingent exposures are those that may arise if an event occurs.

As an example, a fund with a base currency in US dollars writes a contract where the limit is in NZ dollars and is required to post collateral for the limit in that currency. If the manager does not hedge this collateral and there is no loss, the fund will be exposed to changes in the value of the collateral. The manager may judge the probability of a loss to be low, and so hedge all or most of the collateral exposure back into USD, so in the event of no loss the fund is hedged against currency movements. If an event occurs, any gain or loss from currency in the loss amount – and possibly unwinding the hedge for the loss amount – would be recognized as an adjustment to the loss amount in USD.

We ask for information on net balance sheet currency exposures, taking into account currency hedges in place (other than those used to create share classes in currencies other than the base currency).

Using spot exchange rates and omitting any assets or liabilities arising from FX hedging related to non-USD share classes, we ask for the net exposures of the Fund to various currencies:

- **16.9.1 USD**
- **16.9.2 GBP**
- **16.9.3 Euro**
- **16.9.4 JPY**
- **16.9.5 AUD**
- **16.9.6 NZD**
- **16.9.7 CHF**
- **16.9.8 Other**

16.10 Value of On Risk Contracts by Market

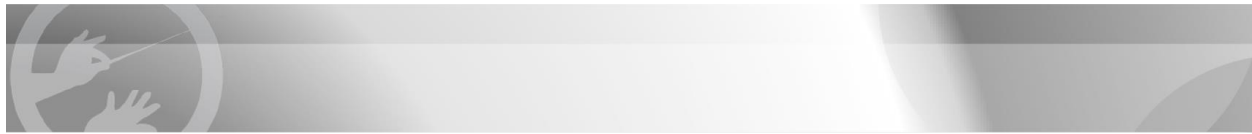
We ask for information on the fund's level of activity in the various insurance and reinsurance markets. Different risk markets within insurance have differing price dynamics as the suppliers of capital are not homogeneous across these markets. This information allows us to understand how the main markets in which the fund is active change over time.

We measure the activity in each market as the total Long and Short values of Insurance contracts at the Cedant Level by type of market.

Quota share agreements that are not either fronted or part of a fronting arrangement are classified as either reinsurance or retrocession depending on whether the counterparty is an insurance or reinsurance company, and the value is that of the quota share itself and not of the underlying contracts.

We ask for the total value of all On Risk contracts from different markets for both Long and Short positions on a Cedant Level basis (GP 6) in USD.

We also ask for the total value of contracts written with an aggregate limit or sub-limit of the following types.



- **16.10.1 Primary Insurance:** Business accessed directly, via an MGA or other delegated authority (but not via quota share).
- **16.10.2 Reinsurance Excess of Loss:** Long value includes Excess of Loss contracts that are written with insurers, while Short value includes contracts written by reinsurers.
- **16.10.3 Reinsurance Quota Share:** Long value Includes quota shares of primary insurance books while Short value includes contracts written with reinsurers.
- **16.10.4 Retrocession Excess of Loss:** Long value includes Excess of Loss contracts that are written with reinsurers while Short value includes contracts written with retrocessionaires.
- **16.10.5 Retrocession Quota Share or Sidecar:** Long value includes quota shares or sidecars of reinsurers, while Short value includes contracts written by retrocessionaires.
- **16.10.6 Rule 144A Catastrophe Bonds:** Cat bonds that accord with Rule 144A and thus can have a secondary market.
- **16.10.7 Private Catastrophe Bonds:** Cat bonds that do not accord with Rule 144A and do not have a secondary market.
- **16.10.8 Hybrid/Enterprise Covers:** Long value includes contracts written by the fund that cover risks in more than one of the insurance, reinsurance, or retrocession markets.
- **16.10.9 Other**
- **16.10.10 Memo: Contracts with an aggregate limit/sub-limit**

16.11 Value by Type of Loss Trigger (for On Risk Contracts)

We also wish to see the breakdown of On Risk (GP 5) contracts by trigger, irrespective of market.

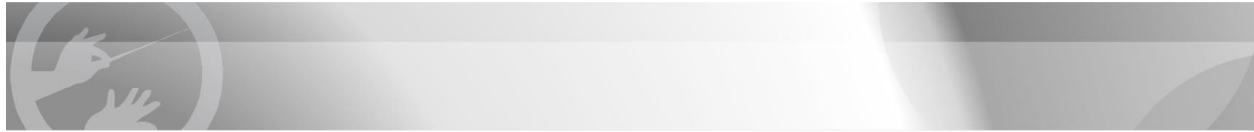
We ask for the total value of all On Risk (GP 5) contracts with different types of triggers for both Long and Short positions on a Fund Level (GP 6) and on a Cedant Level basis (GP 6), in all cases in USD.

- **16.11.1 Indemnity:** Losses determined by cedant experience.
- **16.11.2 Parametric:** Losses determined by reference to one or more measured parameters of an event.
- **16.11.3 Modeled:** Losses determined by the output of a model.
- **16.11.4 Index:** Losses determined by the value of an index.
- **16.11.5 Multiple types of trigger:** Uses more than one type of trigger in the contract.

16.12 Exposures by Region and Peril for On Risk Positions

We ask for contributions to Annual Expected Loss, CVaR 95 and CvaR 98 from combinations of peril/region at the Fund Level (GP 6). The CVaR measures are for the loss distribution of the Main fund that is used as an input to the calculation of its AEP curve in Tab 18. The purpose of collecting the CVaR information is to understand the type of peril/region events that make up the tail of the fund losses. We ask that the subset of events giving rise to losses greater than the related VaR of the loss distribution is used as a basis for the CVaR breakdown, with the total loss amount for each peril/region being the probability-weighted sum of losses to that peril/region from these events. Finally, the percentage that each peril/region total loss makes up of the fund total loss is reported in Table 16.12.

The peril/region groups are as follows:



- **16.12.1 US Hurricane – Florida**
- **16.12.2 US Hurricane – Southeastern US (ex-Florida)**
- **16.12.3 US Hurricane – Northeastern US**
- **16.12.4 US Hurricane – Gulf of Mexico**
- **16.12.5 US Hurricane – Other**
- **16.12.6 US Severe Convective Storm and Wildfire**
- **16.12.7 NA Earthquake**
- **16.12.8 Japanese Wind**
- **16.12.9 Japan Earthquake**
- **16.12.10 European Wind**
- **16.12.11 ANZ All Natural Perils**
- **16.12.12 Other (non-cat)**
- **16.12.13 Second and Subsequent Event Covers**

16.13 Sourcing of Business Other Than Catastrophe Bonds

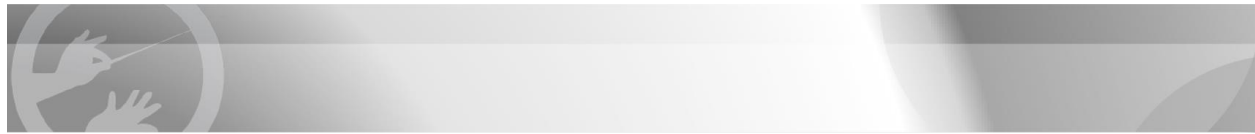
We ask for a measure of the concentration of the current business of the fund if it has been sourced through brokers other than cat bonds. We ask for the aggregate value of both Long and Short On Risk positions (added together rather than netted) sourced from a single broker, the value of contracts sourced from the 3 largest contributors, and the value of contracts sourced by the fund without a broker. Reporting should be done on a Cedant Level basis (GP 6).

- **16.13.1 Largest amount from a single broker**
- **16.13.2 Total amount from top 3 brokers**
- **16.13.3 Total amount written without broker**

16.14 Value of On Risk Long Contracts by Cedant Type

In this section we wish to understand how much business the fund writes for different types of cedant. We ask for the value for all Long On Risk contracts (GP 5) on a Cedant Level basis (GP 6) as of the Reporting Date.

- **16.14.1 Residential:** Contracts written with residential insureds including through MGAs and fronts.
- **16.14.2 Commercial:** Contracts written with commercial insureds including through MGAs and fronts.
- **16.14.3 Regional insurer:** Contracts written with an insurer with only regional presence.
- **16.14.4 Nationwide insurer:** Contracts written with an insurer with only nationwide presence.
- **16.14.5 Global insurer:** Contracts written with an insurer with a global presence.
- **16.14.6 Lloyd's syndicate:** Contracts written with syndicates at Lloyd's.
- **16.14.7 ILS Fund:** Contracts written with an ILS fund.
- **16.14.8 Other**



16.15 Relationships with Cedants

We wish to understand the “stickiness” of the Long On Risk contracts in the fund at the Reporting Date (GP 4) on a Cedant Level basis.

- **16.15.1 Number of distinct/independent cedants with renewed contracts (Cedant Level basis):** A renewed contract with a cedant is one where the fund had an underwriting relationship immediately prior to entering into that contract. Please provide the number of cedants with renewed contracts as of the Reporting Date.
- **16.15.2 Total number of distinct/independent cedants to the fund (Cedant Level basis):** Two cedants are independent if the decision to enter into contracts are made by groups within each cedant that are independent from each other.
- **16.15.3 Renewed business (total Long value):** A renewed contract with a cedant is defined as in 16.15.1. Please provide the value of Long contracts which were renewals as of the Reporting Date.
- **16.15.4 Percentage of On Risk Long contracts by value that are syndicated transactions:** The total value of Long contracts that are part of syndicated transactions with concurrent terms as a percentage of the total Long On Risk portfolio at the Reporting Date on a Cedant Level basis.
- **16.15.5 Largest cedant as a percentage of AUM**
- **16.15.6 Largest 3 cedants as a percentage of AUM**
- **16.15.7 Largest 5 cedants as a percentage of AUM**

16.16 Breakdown of Fund AUM by Location of Beneficiary

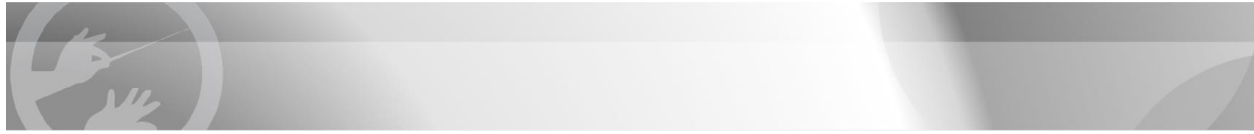
We seek to obtain the breakdown of where investors in the fund are located to understand regional concentrations.

- **16.16.1 US**
- **16.16.2 Canada**
- **16.16.3 UK**
- **16.16.4 Europe**
- **16.16.5 Middle East**
- **16.16.6 Singapore and Hong Kong**
- **16.16.7 Japan**
- **16.16.8 Australasia**
- **16.16.9 Other**

16.17 Breakdown of Loss Reserves by Event and IBNR (Both Net and Gross of Loss Payments)

This section breaks down the reserves from the largest events and asks for the resulting Fair Market valuation of these reserves, both net and gross of loss payments.

Events are described by Date, Name (e.g., a named storm, if applicable) and Region/ Peril, and the top 25 are to be listed in order of size of current fund reserves (omitting impact on holdings of catastrophe bonds). The choice of Geography and Peril is as set out in Table 16.12.



We ask for the Manager's Fair Value estimate of net reserves associated with each event, the amount of IBNR contained in that net reserve estimate, and the Fair Value estimate of net reserves gross of any loss payments to date.

[16.18 Comment](#)

Please provide any necessary comments with reference to the table or Manual number.



Tab 17. Share Class Risk Information

In this sheet we ask for a breakdown of the returns for various share classes (the Main share class and the side-pockets as described in GP 2) during the Reporting Period (GP 4) which is over the last month up to the Reporting Date (GP 4). Expenses (including the cost of hedging) should be reported as negative numbers. All entries should be as percentages of the AUM at the start of the Reporting Period.

For the purposes of this sheet, only the breakdown of returns of USD share classes should be reported in Table 17.4. However, for the reconciliation of changes in AUM over a reporting period (Table 17.2), any impact associated with a Targeted Currency Hedging program (GP 2) to create non-USD share classes from the USD share class should also be included.

17.1 Information on Share Classes

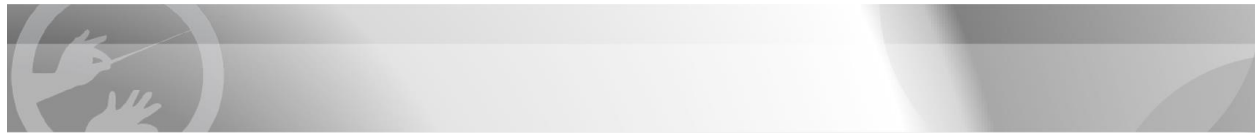
Here we ask for the details of the share class being reported on. Each share class should be reported in its own IOP Template.

- **17.1.1 Share class name:** This should be “Main” for the Main share class (GP 2) and the names given by the manager for each share class that is closed to new investment.
- **17.1.2 Open or closed to new investment?:** The Main share class will be open and side-pockets and Slow Pay share classes will be closed to new investment.

17.2 AUM and Capital Flows during the Reporting Period for the Share Class

The flows here are to be reported in USD. We expect the Reporting Period for this information to be a calendar month but have worded the requirements to accommodate longer periods if necessary.

- **17.2.1 AUM at start of the Reporting Period:** This amount is to include any inflows/subscriptions that occurred at the start of the Reporting Period.
- **17.2.2 Net Earnings recognized during the Reporting Period in the share class:** Net earnings does not include the impact of any Target Currency Hedging Program that may be used to create non-USD share classes.
- **17.2.3 Financial impact of Targeted Currency Hedging Program (for non-USD share classes):** This is included as a separate item to enable reconciliation of AUM over the Reporting Period.
- **17.2.4 Amounts transferred to another share class during the Reporting Period:** These are reported as negative amounts.
- **17.2.5 Amounts returned to investors during the Reporting Period:** These are reported as negative amounts.
- **17.2.6 Amounts subscribed by investors during the Reporting Period:** These are reported as positive amounts. Amounts subscribed during the Reporting Period do not include amounts subscribed to the share class at the beginning of the Reporting Period, which are already included in the NAV at the start of the Reporting period. However, the amounts do include any subscriptions at the end of the Reporting Period or at the Reporting Date.
- **17.2.7 Current AUM at end of Reporting Period:** This should be the same as the sum of the quantities in 17.2.1 to 17.2.6.



17.3 Trapped Collateral Associated with the Share Class at the Reporting Date

This reporting will tell us which side-pocket share classes have Trapped Collateral associated with them (see GP 3). All reporting should be in USD.

- **17.3.1 Trapped Collateral associated with share class at end of Reporting Period:** The sum of all these quantities over all share classes should add up to the total Trapped Collateral of the fund.

17.4 Breakdown of Returns for the Share Class for the Reporting Period

Please report the contribution to the returns of the Share Class from each of the sources below during the Reporting Period. Note that expenses (including the cost of hedging) should be reported as negative numbers. All entries should be as percentages of AUM at the start of the Reporting Period.

Collateralized Contracts

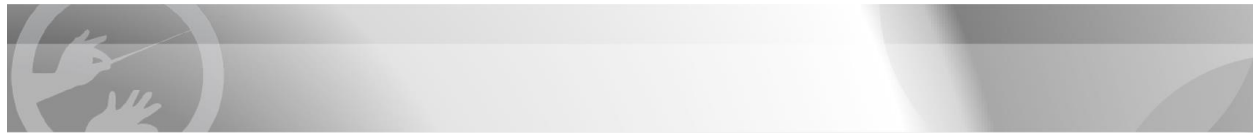
- **17.4.1 Gross premiums recognized (Long positions):** Premiums earned on Long, non-cat bond positions, per seasonal curve.
- **17.4.2 Premiums paid (Short positions):** Premiums paid for risk hedging in non-cat bond structures.
- **17.4.3 Earnings on collateral and changes in the market value of collateral while in trust (at end-of-month spot rate if in currency other than USD):** This does not include any amounts relating to posting of new collateral or release of collateral from trusts.
- **17.4.4 Increase (decrease) in valuation of contracts from changes in market rates or erosion of deductibles:** This amount should be equal to the residual return after all other income and expense amounts during the Reporting Period as reported elsewhere in Section 17.4 have been taken into account.

Catastrophe Bonds

- **17.4.5 Coupons received (Long positions):** Please report coupons received on Long cat bond positions.
- **17.4.6 Coupons paid (Short positions):** Please report coupons paid on cat bonds that have been shorted.
- **17.4.7 Realized trading income from catastrophe bonds (net):** Please report all realized trading income from catastrophe bond positions during the Reporting Period.
- **17.4.8 Valuation changes in catastrophe bond positions (net):** Please report any unrealized valuation changes arising out of all holdings of catastrophe bonds, both Long and Short, in the portfolio during the Reporting Period.

Changes in Reserves

- **17.4.9 Impacts from decreases (increases) in total reserves relating to new events in the Reporting Period on Long positions**
- **17.4.10 Impacts from increases (decreases) in total reserves relating to new events the Reporting Period on Short positions**



- **17.4.11 Impacts from decreases (increases) in total reserves relating to losses occurring in prior Reporting Periods on Long positions**
- **17.4.12 Impacts from increases (decreases) in total reserves relating to losses occurring in prior Reporting periods on Short positions**

Other

- **17.4.13 Other earnings on assets including cash not held in trusts**
- **17.4.14 Increase (decrease) in value of FX hedges of collateral or catastrophe bonds (other than Targeted Currency Hedging programs for non-USD share classes)**
- **17.4.15 Increase (decrease) in value of any other assets/liabilities**

Operating Expenses

- **17.4.176 Direct borrowing costs:** Interest on with-recourse loans outstanding during the Reporting Period.
- **17.4.17 Brokerage costs recognized on Long contracts during the Reporting Period**
- **17.4.18 Brokerage costs recognized on Short positions during the Reporting Period**
- **17.4.19 Ceding commissions and profit commissions incurred on quota shares during the Reporting Period**
- **17.4.20 Fronting fees and stop-loss/Tail Hedge expenses incurred during the Reporting Period**
- **17.4.21 Transformer expenses incurred during the Reporting Period**
- **17.4.22 Other transaction expenses incurred during the Reporting Period**
- **17.4.23 Other operating expenses incurred during the Reporting Period**

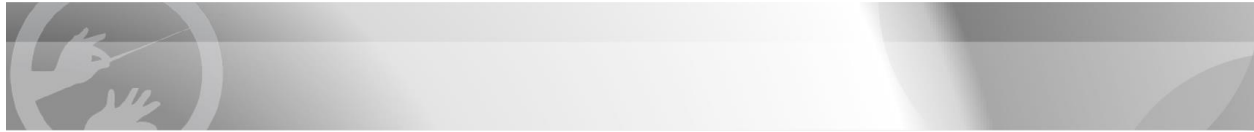
Gross Return

- **17.4.24 Gross Return:** Net outcome of the above sources of income and expenditure **during the Reporting Period.**

Fees and Allocated Share Class Expenses

- **17.4.25 Total management fees accrued/charged by the Manager in the Reporting Period:** The management fees charged to a closed Share Class, or for the Main share class (GP 2), the AUM-weighted average management fee, each expressed as a percentage of AUM, for all open share classes.
- **17.4.26 Total performance fees accrued/charged by the Manager in the Reporting Period:** Any performance fee charged on a closed share classes, or for the Main share class (GP 2), the AUM-weighted average performance fee cost, each expressed as a percentage of AUM, for all open share classes.
- **17.4.27 Non-operating expenses allocated to the share class during the Reporting Period:** For the Main share class (GP 2), the AUM-weighted average non-operating expenses, each expressed as a percentage of AUM, for all open share classes.

Net Return for the Reporting Period



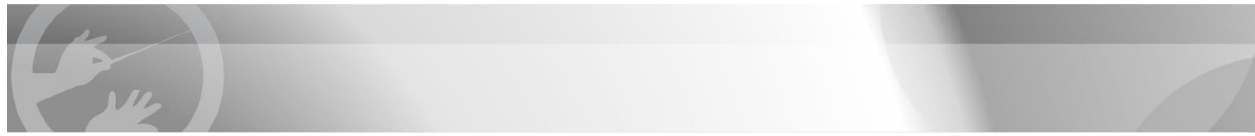
- **17.4.28 Net Return:** This is equal to Gross Returns less Fees and Allocated Share Class Expenses.
- **17.4.29 Memo:** Is the share class the Main share class (GP 2)

Management and Performance Fees

- **17.4.30 Management fees as a percentage of AUM for the largest open share class**
- **17.4.31 Performance fees as a percentage of AUM for the largest open share class**
- **17.4.32 Management fees as a percentage of AUM for the share class with the highest fees**
- **17.4.33 Performance fees as a percentage of AUM for the share class with the highest fees**

17.5 Comment

Please provide any necessary comments with reference to the table or Manual number.



Tab 18. AEP Curve

We ask for information on the Aggregate Exceedance Probability (“AEP”) curve of a fund twice a year – as of January 1st and again as of July 1st. In each case we ask for the calculation to include any new business and renewals written effective as of those dates.

An AEP curves shows the shape of the cumulative distribution of returns for a fund (GP 8). The “aggregate” refers to the fact that the calculations of the curves take into account that there may be multiple events causing loss in the calculation period.

An AEP curve does not provide a third-party view of the fund’s loss or return distribution for the coming year because the models used by managers to produce them typically reflect each manager’s own “view-of-risk”, as well as assumptions about exposures and modeling that may vary. However, such curves are the best source of risk metrics for a fund, as they combine fund exposures with modelling of event impacts and assign probabilities to the outcomes. Detailed reporting of the curve by event may enable aggregation of outcomes across multiple funds to create an approximate view of portfolio risk. Although the modelling of each fund reflects each manager’s “view on risk”, we believe that aggregating into a portfolio view should alert the owner of the portfolio to aggregations of risk occurring because of multiple shareholdings. Below we set out assumptions to be used by a manager in calculating AEP curves to increase the degree of compatibility of reporting.

We note that the information requested in Sheets 19-26 will also provide other views on possible accumulations of exposures by event.

An investor that has an existing investment in the Main share class may also have shareholdings in related share classes formed as a result of large losses that have given rise to uncertainty of value (side-pockets). However, the risk associated with many side-pockets are for the most part different to the risk associated with the Main share class, as the event in question has occurred and so most of the side-pocket risks relate to the degree of loss and not its occurrence.

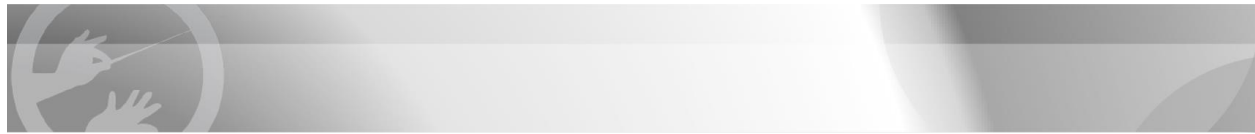
Some side-pockets may also have “on risk” contracts in them depending on when they were formed. Different shareholders in the fund may own differing amounts of side-pocket shares, depending on when they invested and when side-pockets were formed. On balance, we have decided to ask for the risk profile of a new investor in the fund. This means we ask for the AEP curve of the Main USD fund only, as we do not wish to include any currency hedging activity related to creating non-USD share classes.

The AEP curve we ask for shows the distribution of net returns on AUM for the fund. Often AEP curves are provided for just losses associated with a fund, but we regard the level of premium income, other income, fund expenses and fees as important aspects of a fund’s overall risk profile.

18.1 AEP Curve Reporting

- **18.1.1 AEP Curve as at date:** This should be either 1st January or 1st July of the current year.

Calculation Checklist (Desired Value is TRUE)



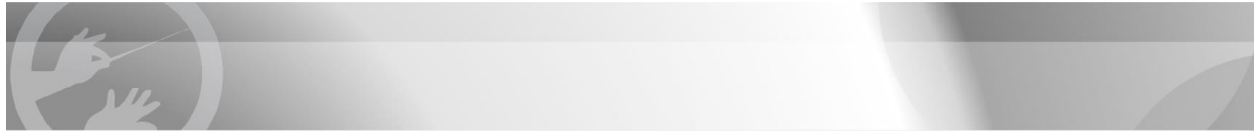
To maximize the comparability between AEP curves, we ask managers to use all the following assumptions in constructing the AEP curves and to let us know of any they do not make. The answer sought to all the following statements is TRUE. However, if it is N/A, please enter False and say N/A in the Comment.

The Following are the Assumptions we ask managers to make in the calculation of the AEP Curve:

- **18.1.2 Reported returns are returns on the Main Fund USD AUM.** This will include the USD-equivalent of any non-USD share classes, but as set out below, the returns should not include any contribution from currency hedging used to create these non-USD share classes.
- **18.1.3 Assumes a forward-looking 12-month view.**
- **18.1.4 Contains all On Risk contracts and contracts that will become On Risk in the Main Fund during this 12-month period.**
- **18.1.5 Exposures/remaining limits are adjusted for any losses in previous periods.**
- **18.1.6 The returns are calculated based on aggregate losses during the 12-month period.**
- **18.1.7 Assumes each contract renews at same price/risk/terms at end of its risk-period, as opposed to "run-off" view.**
- **18.1.8 If primary insurance attritional risks are taken, these risks are included in the modelling.**
- **18.1.9 Includes a loss adjustment for unmodelled perils.** An unmodelled peril are defined as not having a vendor/manager produced stochastic event-set based model, but it still may have a manager-produced model for estimating the impacts of the peril.
- **18.1.10 Returns are net of fees.**
- **18.1.11 Returns are net of fund level expenses.**
- **18.1.12 Return includes interest income on unencumbered cash (i.e., not in trusts) and on non-insurance investments.**
- **18.1.13 Return includes interest on assets in trust in relation to collateralized contracts.**
- **18.1.14 Return includes the floating rate portion of coupons on catastrophe bonds.**
- **18.1.15 Fund is assumed to be above any high-water mark.** This because we are considering returns for a new investor.
- **18.1.16 Returns exclude any FX hedging costs relating to creating non-USD share classes.**
- **18.1.17 Please specify the underlying event-set source (AIR/RMS/Mixture/Other).** This does not require a True/False answer but the answer should be provided in the Comment cells.
- **18.1.18 Software Version.** Again, please provide this in the Comment cell.

Data on Other Quantities (USDm)

- **18.1.19 AUM of Main Fund being modeled (used as denominator of returns).**
- **18.1.20 Value of Portfolio being modeled.**
- **18.1.21 Total interest income included in projected returns.** From unencumbered cash, non-insurance investments, assets in trusts and floating rate portion of cat bond coupons.
- **18.1.22 Amount of unencumbered cash and non-insurance investments in modeled fund.**
- **18.1.23 Amount of assets held in trust for collateralized reinsurance contracts.**
- **18.1.24 Total face value of cat bonds.**



Percentages (Annualized %). Please report interest rates that would be assumed even if interest income is not included in returns.

- **18.1.25 Interest rate assumed to be earned on cash and non-insurance investments.**
- **18.1.26 Interest rate assumed to be earned on assets in trust for collateralized contracts.**
- **18.1.27 Interest rate assumed on floating rate portion of catastrophe bond coupons.**
- **18.1.28 Level of management fee charged or applicable.**
- **18.1.29 Level of performance fee assumed (without any high-water mark) or applicable.**
- **18.1.30 Hurdle rate for performance fee (%)**

Other Costs (% of NAV)

- **18.1.31 Assumed fund expenses (i.e., other than underwriting, operating, and FX hedging expenses and not including expenses for the creation of non-USD share classes):** Please refer to GP 2.

18.2 AEP Curve Output for Fund (fund return % AUM)

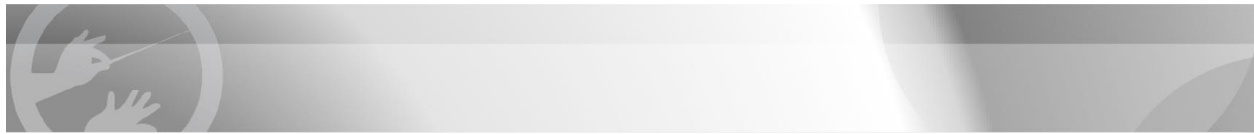
These are the modelled returns of the fund at various percentile levels.

- **18.2.1 0%**
- **18.2.2 5%**
- **18.2.3 10%**
- **18.2.4 20%**
- **18.2.5 30%**
- **18.2.6 40%**
- **18.2.7 50%**
- **18.2.8 60%**
- **18.2.9 70%**
- **18.2.10 80%**
- **18.2.11 90%**
- **18.2.12 95%**
- **18.2.13 96%**
- **18.2.14 98%**
- **18.2.15 99%**
- **18.2.16 99.5%**

Statistics of the Distribution of Returns on NAV

Some of these statistics can be approximately read off the AEP Curve, but others require calculation from the whole distribution. We ask for all to be reported below.

- **18.2.17 No-Loss Return**
- **18.2.18 Median Return**
- **18.2.19 Mean Return**
- **18.2.20 Probability of Positive Return**



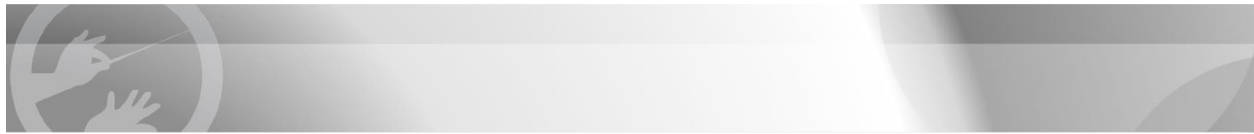
- **18.2.21 Probability of no-loss**
- **18.2.22 Standard Deviation of distribution of net returns**
- **18.2.23 CVaR (95%) – The Conditional VAR 95%**
- **18.2.24 CVaR (98%)– The Conditional VAR 98%**
- **18.2.25 CVaR (99%)– The Conditional VAR 99%**

Ratio

- **18.2.26 Omega ratio:** A risk return performance measure that is defined as the ratio of the probability weighted gains vs probability weighted losses in relation to a threshold return target. Use interest rate assumed in 18.1.26 as the threshold return target or, if interest income is not included in returns, use 0%.

18.3 Comment

Please provide any comments with reference to the table or Manual number.



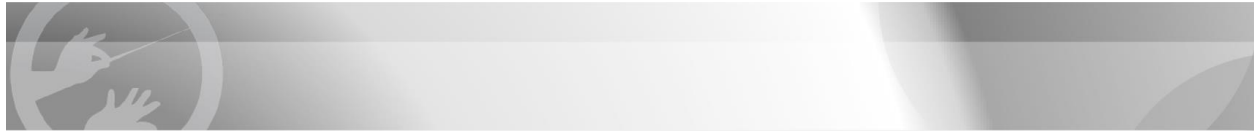
Tab 19. Historic Stress Years

19.1 Modelled Fund Returns in Historic Stress Years (using assumptions from Tab 18. AEP Curve)

We ask for the loss to the current On Risk portfolio (including contracts with On Risk exposure in side-pockets) in several past years where multiple events occurred. We note that returns are based on each manager's modeling, but we can add up the losses by such annual events across a portfolio of funds to get an impression of the likely behavior of the portfolio. All modelled losses should be presented in USD.

Please provide any necessary comments in the "Comment" column.

- **2005**
- **2011**
- **2017**
- **2018**
- **2019**
- **2020**
- **2021**
- **2022**



Tabs 20 through 25

We ask for the loss to the current On Risk portfolio, including contracts with On Risk exposure in side-pockets from each of the given large events were to occur on the reporting date. In this case, the outcome is for a single event. As before, these results can be used to give an impression of the likely behavior of a portfolio of funds. All modeled losses should be presented in USD.

Each tab includes a space for comments. Please provide any necessary comments with reference to the table or Manual number.

- **Tab 20.1 Modeled Losses from Historic Events - US HURRICANE**
- **Tab 21.1 Modeled Losses from Historic Events - EUROPEAN WIND**
- **Tab 22.1 Modeled Losses from Historic Events - US EARTHQUAKE**
- **Tab 23.1 Modeled Losses from Historic Events - JAPANESE EARTHQUAKE**
- **Tab 24.1 Modeled Losses from Historic Events - JAPANESE TYPHOON**
- **Tab 25.1 Modeled Losses from Historic Events - AUSTRALIA AND NEW ZEALAND**