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BAR MUTUAL INDEMNITY FUND LIMITED

SOLVENCY AND FINANCIAL CONDITION REPORT (SFCR)

FOR THE YEAR ENDED 31 MARCH 2026

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SUMMARY

The harmonised EU-wide regulatory regime for Insurance Companies, known as Solvency II, came into force with effect from 1 January 2016. The regime requires reporting and public disclosure arrangements to be put in place by insurers and some of that is required to be published on the Company's public website.

This report covers the Business and Performance of the Company, its System of Governance, Risk Profile, Valuation for Solvency Purposes, Capital Management and required Quantitative Reporting Templates. The ultimate Administrative Body that has the responsibility for all these matters is the Company's Board of Directors, with the help of various governance and control functions that it has put in place to monitor and manage the business.

The Company's financial year runs to 31 March each year and it reports its results in GBP-Pound Sterling.

For Solvency purposes, the Company uses the standard formula to calculate its Solvency Capital Requirement ("SCR") and as a mutual mono line insurer providing professional indemnity insurance to self-employed barristers and entities authorised by the Bar Standards Board in England and Wales, the Company's insurance business is classified as General Liability business for Solvency II purposes. All business is underwritten from the United Kingdom.

The principal risk facing the Company as an insurance company is a severe claims experience. The claims history demonstrates that, quite unexpectedly, claims can climb to levels that could have an impact on its financial strength were it not adequately reserved.

Accordingly, the Company has always adopted a conservative approach to its operations. This is to ensure that it has strong reserves that are capable of absorbing any exaggerated developments in its claims experience without future Members having to pay for the claims of their predecessors. It also helps in ensuring that the Company has time to react to any unexpected increases in its costs base (the cost of reinsurance for example), or its regulatory capital requirement, without having to take drastic unplanned measures.

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SUMMARY (continued)

At the same time, however, the Board is highly conscious of not accumulating reserves in excess of what a sensible degree of prudence requires. To this end, and as part of its Risk Appetite Statement, the Board formulated and has for some years applied a consistent policy to the amount of capital it should hold above its regulatory capital requirement to ensure that it has enough to absorb any unexpected shocks but not too much. The policy provides for a target range in excess of the Company's regulatory capital requirement (based on Tier 1 basic own funds) with upper and lower limits, within which its free reserves for regulatory purposes should sit.

The upper and lower targets have been calculated with reference to a 1 in 20-year capital loss. The ranges as at 31 March 2026 are shown in the table below:

	£'000
Regulatory Capital Reserves as at 31 March 2026 (Tier 1basic own funds)	53,945
Solvency Capital Requirement	29,642
Lower capital target	43,159
Upper capital target	56,675

As part of its Risk Appetite Statement, the Company manages its regulatory capital position with reference to Tier 1 regulatory capital only. In the event that the Company's regulatory capital reserves (Tier 1) fall below, or exceed the target range set in its capital resources policy, it is required to manage its capital reserves into the target range over a reasonable period. To achieve this, one of the tools is to increase or decrease the rates it sets for areas of practice or increase or decrease the level of premium deferral granted to Members, or it can do both. For the 2025 renewal, and without departing from its underwriting criteria for the premium rate calculation, the rates charged for several areas of practice were amended and the premium deferral was retained at 0%. The effect of these changes was to maintain the Regulatory Capital Reserves within its defined target limits.

This demonstrates that the risk appetite policy is working effectively in managing its free reserves.

During the year under review, the Company recorded a surplus of £7.912m as reported in its annual financial statements under UK GAAP. The surplus was due to various factors such as increase in premiums generated due to premium rate changes and increase to premium cap as well as positive investment returns of 5.87%, higher than last year's positive return of 3.77%. This was offset by higher reinsurance costs, and increased operating expenses.

Free reserves of the Company as at 31 March 2026 now stand at £48.419m.

For solvency purposes, its regulatory capital reserves is £66.068m (This is made up of Tier 1 capital of £53.945m and Tier 2 capital of £12.123m) and its Solvency Capital Requirement (SCR) is £29.642m; at the year end the Company exceeds its SCR by £36.425m (ratio 222.88%).

The Company's Minimum Capital Requirement (MCR) has been calculated at £9.178m; at the year-end, the Company exceeds its minimum capital requirement by £44.767m (ratio of 587%).

For solvency purposes Tier 1 and Tier 2 capital can be used to cover the SCR whereas only Tier 1 capital can be used to cover the MCR.

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DIRECTORS' REPORT

Directors' Responsibilities

We acknowledge our responsibility for preparing the Solvency and Financial Condition Report in all material respects in accordance with the PRA Rules and the Solvency II Regulations. The Solvency II Directive, the Delegated Acts, related Implementation Rules, Technical Standards and Guidelines, as well as PRA rules provide the regulatory framework in which the Company operates. The Solvency II rules and regulations include, but are not limited to, the recognition and measurement of its assets and liabilities including Technical Provisions and Risk Margin, the calculation of its capital requirement and the reporting and disclosures of the Solvency II results.

Directors' Statement

We are satisfied that:

- throughout the financial year in question, the Company has complied in all material respects with the requirements of the PRA Rules and the Solvency II Regulations as applicable to the insurer; and
- it is reasonable to believe that the Company has continued so to comply subsequently and will continue so to comply in future.

Statement of disclosure of information to auditors

In accordance with Section 418 of the Companies Act 2006, each of the persons who is a director in office at the date this report is approved, confirms that: (a) so far as each of them is aware, there is no relevant audit information of which the auditors are unaware; and (b) each of them has taken all the steps that he ought to have taken as a director in order to make himself aware of any relevant audit information and to establish that the auditors are aware of that information.

By order of the Board

Signed by:
Rajiv Harnal
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Rajiv Harnal
Chief Financial Officer
BAR MUTUAL INDEMNITY FUND

Date 08 July 2026 | 17:08 BST

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AUDITOR'S REPORT

Report of the external independent auditor to the Directors of Bar Mutual Indemnity Fund Limited pursuant to Rule 4.1 (2) of the External Audit Chapter of the PRA Rulebook applicable to Solvency II firms.

Report on the Audit of the relevant elements of the Solvency and Financial Condition Report

Opinion

Except as stated below, we have audited the following documents prepared by Bar Mutual Indemnity Fund Limited (the 'Company') as at 31 March 2026:

- The 'Valuation for solvency purposes' and 'Capital Management' sections of the Solvency and Financial Condition Report of Bar Mutual Indemnity Fund Limited as at 31 March 2026, ('**the Narrative Disclosures subject to audit**'); and

- Company templates IR.02.01.02, IR.17.01.02, IR.23.01.01, IR.25.04.21 and IR.28.01.01 ('**the Company Templates subject to audit**').

The Narrative Disclosures subject to audit and the Templates subject to audit are collectively referred to as the 'relevant elements of the Solvency and Financial Condition Report'.

We are not required to audit, nor have we audited, and as a consequence do not express an opinion on the Other Information which comprises:

- The 'Business and performance', 'System of governance' and 'Risk profile' elements of the Solvency and Financial Condition Report;

- Company templates IR.05.02.01, IR.05.04.02 and IR.19.01.21;

- the written acknowledgement by management of their responsibilities, including for the preparation of the Solvency and Financial Condition Report ('**the Responsibility Statement**').

To the extent the information subject to audit in the relevant elements of the Solvency and Financial Condition Report includes amounts that are totals, sub-totals or calculations derived from the Other Information, we have relied without verification on the Other Information.

In our opinion, the information subject to audit in the relevant elements of the Solvency and Financial Condition and the relevant templates of the Company as at 31 March 2026 is prepared, in all material respects, in accordance with the financial reporting provisions of the PRA Rules and Solvency II regulations on which they are based, as modified by relevant supervisory modifications, and as supplemented by supervisory approvals and determination.

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AUDITOR'S REPORT (continued)

Basis for Opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)), including ISA (UK) 800 and ISA (UK) 805. Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the relevant elements of the Solvency and Financial Condition Report section of our report. We are independent of Bar Mutual Indemnity Fund Limited in accordance with the ethical requirements that are relevant to our audit of the Solvency and Financial Condition Report in the UK, including the FRC's Ethical Standard as applied to public interest entities, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Conclusions relating to going concern

In auditing the Solvency and Financial Condition Report, we have concluded that the Directors' use of the going concern basis of accounting in the preparation of the Solvency and Financial Condition Report is appropriate. Our evaluation of the Directors' assessment of the Company's ability to continue to adopt the going concern basis of accounting included:

- Review of the latest available Own Risk and Solvency Assessment ('ORSA') return to ensure compliance with regulatory solvency requirements, noting the Company to be in excess of the minimum solvency requirement;

- Checked the solvency through reference of sufficiency of assets to meet liabilities and the adequacy of regulatory capital;

- Review of the Company's budget for the next 12 months considering the validity of assumptions made; and

- Enquiries of the Directors and scrutiny of management information, board minutes and regulatory correspondence to ascertain the existence of undisclosed events or obligations that may cast doubt on the Company's ability to continue as a going concern.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Company's ability to continue as a going concern for a period of at least twelve months from when the Solvency and Financial Condition Report is authorised for issue.

Our responsibilities and the responsibilities of the Directors with respect to going concern are described in the relevant sections of this report.

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AUDITOR'S REPORT (continued)

Emphasis of Matter – Basis of Accounting

We draw attention to the 'Valuation for solvency purposes' section of the Solvency and Financial Condition Report, which describe the basis of accounting. The Company Solvency and Financial Condition Report is prepared in compliance with the financial reporting provisions of the PRA Rules and Solvency II regulations, and therefore in accordance with a special purpose financial reporting framework. The Solvency and Financial Condition Report is required to be published, and intended users include but are not limited to the Prudential Regulation Authority. As a result, the Company Solvency and Financial Condition Report may not be suitable for another purpose. Our opinion is not modified in respect of these matters.

Other Information

The Directors are responsible for the Other Information.

Our opinion on the relevant elements of the Solvency and Financial Condition Report does not cover the Other Information and, we do not express an audit opinion or any form of assurance conclusion thereon.

In connection with our audit of the Solvency and Financial Condition Report, our responsibility is to read the Other Information and, in doing so, consider whether the Other Information is materially inconsistent with the relevant elements of the Solvency and Financial Condition Report, or our knowledge obtained in the audit, or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the relevant elements of the Solvency and Financial Condition Report or a material misstatement of the Other Information. If, based on the work we have performed, we conclude that there is a material misstatement of this Other Information, we are required to report that fact. We have nothing to report in this regard.

Responsibilities of Directors for the Solvency and Financial Condition Report

The Directors are responsible for the preparation of the Solvency and Financial Condition Report in accordance with the financial reporting provisions of the PRA rules and Solvency II regulations which have been modified by the modifications, and supplemented by the approvals and determinations made by the PRA under section 138A of FSMA, the PRA Rules and Solvency II regulations on which they are based.

The Directors are also responsible for such internal control as they determine is necessary to enable the preparation of a Solvency and Financial Condition Report that is free from material misstatement, whether due to fraud or error.

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AUDITOR'S REPORT (continued)

Auditor's Responsibilities for the Audit of the relevant elements of the Solvency and Financial Condition Report

It is our responsibility to form an independent opinion as to whether the relevant elements of the Solvency and Financial Condition Report are prepared, in all material respects, with financial reporting provisions of the PRA Rules and Solvency II regulations on which they are based.

Extent to which the audit was capable of detecting irregularities, including fraud

Irregularities, including fraud, are instances of non-compliance with laws and regulations. We design procedures in line with our responsibilities, outlined above, to detect material misstatements in respect of irregularities, including fraud. The extent to which our procedures are capable of detecting irregularities, including fraud is detailed below:

- Obtaining an understanding of the legal and regulatory framework applicable to the Company's operations and the control environment in monitoring compliance with laws and regulations;

- Review of correspondence with the Prudential Regulation Authority ('PRA') and Financial Conduct Authority ('FCA');

- Review of the assumptions and methodology applied by the Company in the valuation of the Best estimate to consider whether the methods utilised are in compliance with Technical Actuarial Standards (TAS 100: Principles for Technical Actuarial Work and TAS 200: Insurance), using our actuaries as audit specialists;

- Enquiries of management;

- Review of minutes of board meetings throughout the period; and

- Agreement of relevant elements of the Company SFCR to underlying supporting documentation.

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AUDITOR'S REPORT (continued)

Our objectives are to obtain reasonable assurance about whether the relevant elements of the Solvency and Financial Condition Report are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but it is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the decision making or the judgement of the users taken on the basis of the Solvency and Financial Condition Report.

A further description of our responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at: https://www.frc.org.uk/Our-Work/Audit/Audit-and-assurance/Standards-and-guidance/Standards-and-guidance-for-auditors/Auditors-responsibilities-for-audit/Description-of-auditors-responsibilities-for-audit.aspx

Report on Other Legal and Regulatory Requirements.

In accordance with Rule 4.1 (3) of the External Audit Chapter of the PRA Rulebook for Solvency II firms we are required to consider whether the Other Information is materially inconsistent with our knowledge obtained in the audit of the Company statutory financial statements. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

DocuSigned by:
Alexander Barnes
0FD4E1FFA52549F...

Alexander Barnes (Senior Statutory Auditor)

For and on behalf of BDO LLP, Statutory Auditor

55 Baker St,

London

W1U 7EU

Date 09-07-26 | 16:33 BST

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A. BUSINESS AND PERFORMANCE

A.1. BUSINESS

Bar Mutual Indemnity Fund Limited ('the Company') is a company limited by guarantee regulated by the Prudential Regulation Authority ("PRA") and the Financial Conduct Authority ("FCA"). The Directors of the Company are responsible for ensuring that the business is operated at all times in accordance with the requirements of the PRA and FCA, as well as discharging their fiduciary and statutory duties. The PRA is located at 20 Moorgate, London, EC2R 6DA, United Kingdom and the FCA at 12 Endeavour Square, London, E20 1JN, United Kingdom.

The Company is incorporated in England as a Company limited by guarantee and not having share capital. In the event of liquidation, the net assets of the Company are to be distributed amongst such Members as per the rules set out in the Articles of Association.

The external auditors of the Company are BDO LLP situated at 55 Baker Street, London, W1U 7EU.

The Company is a mutual insurance company providing professional indemnity insurance to barristers in self-employed practise (and since April 2015 certain entities approved by the Bar Standards Board) in England and Wales (referred to as "Members" in the remainder of this document).

During the year, there has been no business or other unusual or unexpected events that have had a material impact on the Company.

UK P &I Club acquisition of Thomas Miller

In March 2026 UK P&I announced a non-binding proposal to acquire the entire share capital of its Company's Managers the Thomas Miller Group of Companies. At present discussions remain ongoing and the Board is considering the impact and opportunities that may arise from this proposal.

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A.2. UNDERWRITING PERFORMANCE

All of the Company's business is underwritten from the UK. The Company writes only one line of business which is to provide professional indemnity insurance to self-employed barristers and entities authorised by the Bar Standards Board in England and Wales.

For the year ended 31 March 2026, the Company produced an underwriting surplus of £3.648m (2025: £3.581m) as detailed further in the table below which is a summary of the Company's technical account reported on a UK GAAP basis.

The table below compares the key financial information from the 2026 financial year with the corresponding figures from the 2025 financial year.

	2026 £'000	2025 £'000
Gross Premium Earned	27,080	26,968
Reinsurance Premium	(7,623)	(7,540)
Net claims incurred	(14,364)	(14,500)
Operating expenses	(1,445)	(1,346)
Surplus/(deficit) on technical account	3,648	3,582

Premium written has increased due to the Board decision to change rates in certain areas of practice coupled with higher declared income from members. As well as the premium deferral given to members being retained at 0% (2025: 0%) as part of its capital management policy to maintain its regulatory capital within the target range.

Reinsurance premium has increased from last year reflecting the higher levels of written premium. The Company has changed its reinsurance policy so that it now has a defined number of free reinstatements from the 2016 policy year onwards which will give it further protection should claims deteriorate in the future.

Net claims incurred are lower than last year and reflect the general nature of the business with no particular trends developing. The Company is protected against the incidence of claims by reinsurance contracts. In respect of the year ended 31 March 2026 the Company had reinsurance cover relating to claims and settlement costs of £250,000 in excess of £500,000 subject to a £500,000 aggregate deductible, £750,000 in excess of £750,000 subject to a £750,000 aggregate deductible and £1,000,000 in excess of £1,500,000.

Also included are Fees Breakout Cover for each Insured Member with policy limits of indemnity up to and including £2,500,000 purchased through the Reinsurer, £1,500,000 in excess of £3,250,000 ultimate net loss each and every claim, each insured Member.

Operating expenses are higher than last year with increases arising in D&O insurance, Regulatory fees, Audit fees and Legal fees.

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A.2. UNDERWRITING PERFORMANCE (continued)

The Directors have set in place formal investment policies and objectives. The objectives of the Investment Policy are the following:

- To maintain sufficient funds to cover its known claim liabilities and its required regulatory capital; and
- To preserve capital in real terms (CPI rate of inflation) over the medium term, the medium term being defined as a period of five years.

The investment return for the year under review was a positive 5.87% (2025: positive 3.77%). The positive return for the period was driven primarily by the market conditions existing at the year-end with positive returns from fixed income, equities and its alternatives income portfolio.

A.3. INVESTMENT PERFORMANCE

In accordance with the Investment policy, the investment mandate is updated on a regular basis, with a full review taking place every three years.

Invested assets split by asset class as at 31 March 2026:

	2026 £'000	2025 £'000
Asset class		
Government fixed interest securities	84,221	75,303
Fixed Income Corporate Bonds	-	-
Equities &Alternatives	18,714	12,909
UCITS	4,654	10,908
Other cash with financial institutions	42	33
	107,631	99,153

The following table details the Company's investment income by asset class as reported in the Company's UK GAAP financial statements:

	2026 £'000	2025 £'000
Asset class		
Dividends from equities	736	1,020
Interest on bonds and government stocks	2,025	1,851
Interest on bank deposits	39	-
	2,800	2,871

Expenses related to the management of these investments were £504k for the year (2025: £482k).

The Statement of Income and Movement in Reserves may be seen on page 27 of the Company's Directors' Report and Financial Statements.

A.4. PERFORMANCE OF OTHER ACTIVITIES

The Company has no other activities other than its main insurance activities presented in A2.

A.5. ANY OTHER INFORMATION

There have been no other material matters affecting business and performance.

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B. SYSTEM OF GOVERNANCE

B.1. GENERAL INFORMATION ON THE SYSTEM OF GOVERNANCE

B1.1 Overview

The Board of Directors

All the Directors are Members of the Company other than the Chief Executive Officer and Chief Financial Officer who are employed by Thomas Miller, Managers of the Company.

Ultimate responsibility for the governance of the Company rests with the Board of Directors. The Company's Directors are drawn from practicing barristers within the Membership. The Directors meet three times a year. The Articles and the Rules give the Board of Directors wide powers to manage the affairs of the Company and set out how these powers are to be exercised.

Although the Managers administer the business of the Company on a day-to-day basis, ultimate responsibility remains with the Directors.

The following items come up annually for consideration at Board Meetings:

- Reinsurance for the next policy year;
- Rates charged to Members and the terms of insurance;
- Approval of the Directors' Report and the audited Financial Statements for the previous year;
- Investment policy;
- Approval of Regulatory returns;
- Claims development;
- Reserving;
- Business risk review.

The Managers prepare the items on the Agenda which the Board then considers.

The Articles allow the Directors to delegate any of their powers to Committees, although the Committee must then conform to any conditions put on it by the Directors.

B1.1.1 Committees

The following committees aid the Board in its duties:

The Audit and Risk Committee assists the Board in reviewing the effectiveness of the Company's internal control processes, the Internal Audit reports, approving the year-end statutory audits, monitoring the Managers' responses to findings and recommendations of Internal audit and statutory audit and assessing the business risks of the Company.

The Claims Committee assists the Board in reviewing issues of principle arising in claims-related matters. The Committee also deals with applications for discretionary cover as and when such applications are made. The Committee meets twice during the year and liaises frequently with the Managers throughout the year on claims-related issues.

The Investment Committee assists the Board in reviewing in detail the performance of the Company's investments and making recommendations to the Board in respect of the Investment Policy and other investment related issues.

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B1.1 Overview (continued)

The Management Fee and Oversight Committee assists the Board in reviewing the effectiveness of the Manager's and reporting to the board on the Managers' management fee proposals.

The Nominations Committee assists the Board in complying with the Company's and its Committees' Fit and Proper Policy. It also assists the Board on the policy it should adopt for the appointment of Directors and in identifying suitable potential candidates for appointment as Directors for the Board to consider.

The Reserves Committee assists the Board in reviewing in detail the Company's claims reserves policy and regulatory capital position and to provide a clear channel of communication between the Managers' actuaries and the Board.

The Rating and Reinsurance Committee assists the Board in reviewing in detail the rating system of the Company and making annual recommendations to the Board in respect of the ratings to be applied to the next policy year. The Committee also reviews the Company reinsurance programme.

The Rules and Cover Committee reviews the terms on which insurance cover is provided by the Company.

The Legal Services Act Committee assists the Board in considering the implications of the Bar Standards Board's decision to allow barristers in private practice to conduct their practice via partnerships, limited liability partnerships and limited companies on the business of Bar Mutual.

It also works with the Rules and Cover Committee to draft for the Board's consideration any amendments to the Company Rules and Terms of Cover that its recommendations (or the Board's acceptance of those recommendations) may require.

B1.1.2 Key functions

The Managers

The Company has no employees and as such the Board relies on the Managers for the day-to-day management duties of the Company. The functions and responsibilities of the Managers are set out in the Management Agreement between the Managers and the Company.

The Board may delegate a wide range of powers, duties and discretions to the Managers on such terms as it sees fit. The Managers are entitled to attend meetings of the Directors and of committees of the Directors and General meetings of the Company unless the Directors otherwise require.

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B1.1.2 Key functions (continued)

The Investment Managers

Investment of the Company's funds is conducted by the Investment Managers in accordance with the Board's Investment Policy and is subject to internal compliance procedures.
The functions and responsibilities of the Investment Managers are set out in the Management Agreement between the Investment Managers and the Company.

Governance Map

The Company maintains a governance map that details the key Senior Insurance Manager Functions and Key Functions. The following functions are maintained through the governance map with a prescribed set of responsibilities:

- Chairman (Board)
- Chairman (Audit & Risk Committee)
- Chief Executive Officer (Managers)
- Chief Financial Officer (Managers)
- Chief Risk Officer (Managers)
- Head of Internal Audit (Managers)
- Chief Actuary (Managers)
- Chief Underwriting Officer (Managers)
- Claims Function (Managers)
- Investment Manager (Managers)
- Compliance Officer (Managers)

B.1.2. Remuneration

Directors receive no annual or attendance fee.

The Company has no internal executive function and its management is wholly performed by companies within the Thomas Miller Holdings Ltd group of companies. The Managers are responsible for recruitment in line with the Thomas Miller Group Recruitment Policy and performance management, ensuring that all staff have and maintain the relevant skills, knowledge and expertise necessary to perform their roles and responsibilities.

The Company pays the Managers a fixed fee for the management of Bar Mutual Indemnity Fund.

B.1.3. Related party transactions

The Company has no share capital and is ultimately controlled by Members who are also the insureds. There have been no related party transactions between the Company and its members outside the normal course of business. The Directors who have insurance policies with Bar Mutual receive this service on the same commercial terms as the other members.

All the Directors are members of the Company other than the Chief Executive Officer and Chief Financial Officer who are employed by Thomas Miller Professional Indemnity Limited ("the Managers"). The Managers received £3,875,000 (2025: £3,675,000) from the Company in respect of management fees for the year part of which is attributable to the salaries of these Executive Directors. The salaries of the Executive Directors are not separately identifiable from the total management fees. The management fees have been fully settled in the year.

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B.1.3. Related party transactions (continued)

There have been two related party transactions during the year for £81,005 and £9,000 (2025: £47,780) paid to Director's in respect of fees earned to act for a Member in relation to an insured claim.

B.1.4. Adequacy of the system of governance

The Directors consider the system to be adequate given the nature scale and complexity of the risks inherent to the Company. There have been no material changes in the Company's system of governance during the reporting period.

B.2. FIT AND PROPER REQUIREMENTS

The Company has in place a Fit & Proper Policy that sets out its approach to the fitness and propriety of the persons responsible for running the Company, including executive senior management and key function holders.

All persons within the scope of the Company's Fit and Proper Policy must have the professional qualifications, knowledge and experience and demonstrate the sound judgement necessary to discharge their areas of responsibility competently, both at the time of their appointment or employment and on a continuous basis to meet the changing or increasing requirements of their particular responsibilities and the business in general.

They must be of good repute and demonstrate in their personal behaviour and business conduct character, integrity and honesty. As part of the assessment consideration will be given to potential conflicts of interest and financial soundness. The level of fitness must be appropriate and proportionate to each person's role, tasks and responsibilities.

The Board must be composed in a way to ensure that its members collectively possess sufficient knowledge, competence and experience to direct and oversee the Company's affairs effectively.

The Managers maintain role specifications for all executive roles that are within the scope of the Fit and Proper Policy which detail the key competencies and duties for each position. All persons to whom the policy applies are required to have the appropriate and designated competencies for their positions.

Fit and proper assessments are carried out by the Chairman, the Company Manager or the Compliance Officer. No person is permitted to undertake their own assessment.

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B.3. RISK MANAGEMENT SYSTEM

The Company's Risk Management System

The Company uses a Risk Management Framework to design an effective risk management system with an integrated approach to risk management and the application of the three lines of defence:

- 1st line of defence: business units, process and risk owners
- 2nd line of defence: risk management and compliance functions
- 3rd line of defence: internal audit.

The risk management system includes:

- a clearly defined and well-documented risk management strategy;
- adequate written policies;
- appropriate processes and procedures;
- appropriate reporting procedures;
- reports on the material risks faced by the Company and on the effectiveness of the risk management system;
- a suitable Own Risk and Solvency Assessment (ORSA);
- underwriting and reserving risk;
- market risk (including investment, asset-liability management, liquidity and concentration risks);
- reinsurance and other risk mitigation techniques;
- credit risk; and
- operational risk.

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B.3. RISK MANAGEMENT SYSTEM (continued)

The risk management system not only covers the risks included in the calculation of the Solvency Capital Requirement but also other risks to which the Company is exposed and which are considered to be materially relevant to its business.

The risk management system also has a coherent focus on data and IT infrastructure governance and appropriate policies and standards to outline the framework within which responsibilities will be exercised. It is supported by a robust internal control system and is designed to identify measure, manage, monitor and report significant risks to the achievement of our business objectives. The core elements of the risk management framework are as follows:

Risk Management Strategy

The objectives of the Company's risk management strategy are to identify measure, monitor, manage, and report in a consistent, continuous and timely fashion, on the basis of the Company's risk appetite as set by the Board.

The Risk Management Framework helps both support and relay the Company's business plan strategy throughout the organisation by ensuring that those factors that may advance or impede the achievement of strategic and operational objectives are managed by strong controls. The risks to which the Company is exposed are recorded in the Business Risk Assessment.

Forecasts and long-term projections of how the business needs to develop, and which internal and/or external factors might affect or impede such development are considered when carrying out business strategy reviews. Risk related to initiatives and objectives adopted in the Business Plan are added to the Business Risk Assessment.

Implementation of the Risk Management Strategy: Risk Policies and Procedures

The Company's strategy is specified in more detail through its policies and Business Plan which underpin its day-to-day business. Policies have been developed for all material risks to which the Company is exposed. They define the Company's approach to risk management overall and more specifically the risk for which the policy has been written. The policies establish the controls, procedures, limits and escalation to ensure that the risks are managed in line with risk appetite. Specific procedures, where appropriate, have been developed to provide full understanding of the means by which the first and second lines of defence will implement the strategy. Policies are typically reviewed on an annual basis, with all policies specifying the required review frequency. Policies and related procedures are stored on the Managers' Electronic Quality Management System and are accessible to the Company's Managers and all staff in the Company's three lines of defence structure.

The policies also include appropriate reporting procedures to ensure that information relating to the component elements of the risk management strategy are routinely reported to the Audit & Risk Committee and to the Board.

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B.3. RISK MANAGEMENT SYSTEM (continued)

Risk Appetite

The Company's Risk Appetite is articulated in the risk appetite statement, which is a document owned by the Board and reviewed on a regular basis as new risks emerge, or at least annually. The Company's business strategy is aligned to the Business Plan and focuses on the following areas:

- To meet the needs of its Members, namely self-employed barristers in England and Wales and certain Bar Standards Board ("BSB") regulated entities ("Entities") (together referred to as "Members" in this Business Plan) for primary layer professional indemnity insurance to a limit of £2.5 million.
- To maintain financial strength by holding lower capital resources that exceed the regulatory capital requirement by an amount that is at least equal to the monetary equivalent of a 1 in 20 year event, and an upper buffer that is the monetary equivalent of a 1 in 20 year event above the lower level.
- To aim to achieve investment returns over a three to five year period that is at least equal to the rate of inflation (measured against CPI) without taking undue risks with the Company's capital.
- To provide cover to members for a premium that is fair and reasonable.

The Board determines the appropriate risk appetite and sets the Company's risk strategy. It has developed high-level risk appetites that are used by the Board to monitor the implementation of the risk strategy. More detailed operational preferences and tolerances are used by the Managers to implement the risk strategy. These are reported to the Board as part of the Company's Own Risk & Solvency Assessment (ORSA) and in Risk Reports as and when tolerances are breached.

The Board bears ultimate responsibility for the management of risk and for maintaining a sound system of internal control that supports the achievement of the business strategy, policies, aims and objectives of the Company. The Audit & Risk Committee supports the Board by providing oversight of the Risk Management Function.

Business Risk Assessment: Measurement and Management

Risks to the business that could inhibit the Company achieving its Business Plan objectives are described in the Business Risk Assessment, together with the consequences should the risk materialise. The risks are categorised into categories (see below) and assessed and monitored on an ongoing basis.

Emerging Risk Register

As explained under "Risk Reporting Procedures" further below, Risk Owners attend regular management meetings, which provide a formal opportunity to highlight and discuss potential emerging risks. Where appropriate, emerging risks are added to Bar Mutual's Emerging Risk Register by the Risk Officer and presented to the Audit & Risk Committee at its first meeting following the update. The Emerging Risk Register is also considered in its entirety at least annually by the Audit & Risk Committee.

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B.3. RISK MANAGEMENT SYSTEM (continued)

Risk Categories

The Business Risk Assessment includes the following categories of risk:

- Underwriting
- Claims
- Strategic
- Reserving
- Counterparty / Credit Risk
- Market (including Investment, Asset-Liability Management, Liquidity and Concentration risks)
- Operational (to include)
    - Operational Controls
    - Financial
    - Information Technology
    - Compliance / Regulatory / Legal

Risk Rating

A rating for each risk is determined by assessing its likelihood (being the likely probability of an occurrence) and impact being a financial assessment of the significance of the event if it occurs, which includes reputational, legal/regulatory and other measures. Each is presented as a value between 1 and 5 (1 being low and 5 being high) in line with a likelihood/impact matrix with financial impact levels. Risks are defined as Red, Amber, Yellow or Green according to a heat map to assist the Board with the prioritisation of the management of risks and demonstrate the importance of the mitigation or controls in place.

The assessment of each risk is on the basis of Inherent Risk and Residual Risk (i.e. the risk that remains after taking into account the strength of current risk management procedures that are in place).

All risks on the Business Risk Assessment are re-assessed on an ongoing basis and at least annually by the Managers and by the Audit & Risk Committee. The Managers, in collaboration with the Risk Officer consider the Business Risk Assessment in the light of changes to the Business Plan.

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B.3. RISK MANAGEMENT SYSTEM (continued)

The Managers and Risk Owners

Each risk on the Business Risk Assessment has a Risk Owner whose responsibilities are:

- To identify and evaluate the risks faced by the Company in the area for which the Risk Owner is responsible, providing adequate information on the status of risks (including substantive changes to or deterioration of existing risks and new or emerging risks and loss/near miss events).
- To implement and uphold policies and procedures on risk management and internal control on a continuous basis.
- To maintain continuous oversight of the status of risks and controls and initiate improvements in design and operation of controls where required.
- To consider the level of risk presented by any proposed initiative in furtherance of Business Plan objectives.
- To submit risk-based reports to meetings of the Managers.
- To review the Business Risk Assessment and draw up recommendations for additions, deletions and amendments.
- To assess the likelihood of the risk occurring and its impact and recommend changes, as appropriate.
- To consider the effectiveness of the controls.

Key risks from Business Risk Assessment

A list of key risks has been compiled by the Company's Board and senior management of the Company based on their experience and expert judgement in running the business. This list provides a high-level overview of the principal risks faced by the business which, individually or in combination, may have a significant, substantial or catastrophic impact on the Company.

Own Risk and Solvency Assessment ("ORSA")

Every year, and on an ad hoc basis if circumstances materially change, the Company prepares an ORSA overview report. The ORSA is the process used by the Company to manage its financial and solvency position over the period of its Business Plan and the ORSA overview report is the culmination of this process into a report reviewed by the Board. As such, it is an intrinsic part of the Company's business planning process.

The key elements of the ORSA process are:

- An analysis of the Company's recent performance
- Assessment of the Company's risk profile
- Consideration of business planning and stress scenarios

The Audit & Risk Committee reviews the ORSA and recommends it for approval and use by the Board.

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B.3. RISK MANAGEMENT SYSTEM (continued)

Own Risk and Solvency Assessment ("ORSA") (continued)

The Board reviews the ORSA and considers appropriate action for the Company such as:

- Capital related decisions
- Premium rating and deferral considerations
- Reassessment of risk profile and risk appetite
- Additional risk mitigating actions

The Assessments to date indicate that the Company is adequately capitalised.

Risk Controls

The Company's Risk Management Framework has been developed to manage risks across the business, using internal control policies, procedures and processes to control risks.

Whereas ultimate control for each risk rests with the Board, day-to-day control is exercised by the Risk Owners unless otherwise stated, as set out in the Business Risk Assessment.

Controls may:

- **Prevent**: controls that reduce the likelihood of the risk occurring. Examples are separation of duties, mandated authorisation or automated processes.

- **Detect**: controls that monitor or identify the risk. Examples are reports or reviews/audits or analyses.

- **Mitigate**: controls that reduce the impact of the risk. Examples are contingency plans and all the contents of the Electronic Quality Management System (EQMS).

Controls may be proactive or reactive. Those that are proactive should reflect the Business Plan objectives and seek not only to reduce the negative impact of risk but also increase the positive potential in risk opportunity.

The nature of the controls implemented, and the level of control exercised are based on the assessment of likelihood of the risk occurring and its impact; the Company's risk appetite; and the cost of implementing controls relative to the significance of the risk.

The Risk Management Framework encompasses a number of elements that together facilitate an effective and efficient operation, enabling the Company to respond to a variety of risks. These elements include:

- **Business planning and budgeting**
  The annual business planning and budgeting process is used to set objectives, agree action plans, and allocate resources. Progress towards meeting Business Plan objectives is monitored regularly.

- **Risk based decision making**
  The Company embeds risk management thinking into all major decisions. Financial and non-financial risks are identified as well as ways of managing them down to levels within the Company's risk appetite.

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B.3. RISK MANAGEMENT SYSTEM (continued)

Risk Controls (continued)

- **Policies and procedures**
  A series of policies underpin the internal control process in relation to risks. The Internal Control Framework document sets out the Company's underlying approach to internal control. The Company's Board sets the policies. EQMS procedures support the policies where appropriate.

- **Early warning mechanisms**
  Early warning mechanisms are risk indicators that alert Risk Owners before a risk crystallises so that proactive action can be taken to manage the potential hazard.

  - Key risk indicators: Where possible, key risk indicators are generated. Key risk indicators, together with key performance indicators, provide information/reports/financial indicators that are reviewed by the Risk Owners to monitor the risk, give advance warning of a possible increased risk, and form part of the management reporting structure.

  - External data: Risk Owners review external sources of information, including from or concerning the Company's client marketplace, competitor information, insurance market and rating agencies.

  Together these factors are also taken into account in the process of identifying and assessing new and emerging risks.

- **Contingency plans**
  The need for contingency plans is considered as part of the assessment of emerging risks and subsequently reviewed as part of the annual risk management review process.

- **Internal audit programme**
  The internal audit plan is developed around the Company's objectives on an annual basis, using the Company's assessment of risks as recorded in the Business Risk Assessment. The planning for the internal audit programme takes into account the assessment by the Risk Officer of the design and operational effectiveness of the risk management process including controls. The work programme considers those controls in place to deal with operational and regulatory risks.

- **Statutory audit**
  Statutory (external) audit provides an opinion on whether the financial statements give a true and fair view of the state of the Company's affairs at the year-end and of its profit or loss for the year just ended.

- **Third party reports**
  From time to time, the use of external consultants may be appropriate in areas such as health and safety or human resources. The use of specialist third parties for consulting and reporting can increase the reliability of the internal control system.

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B.3. RISK MANAGEMENT SYSTEM (continued)

Risk Controls (continued)

- **Risk-based reporting**
  Risk-based reporting has been established throughout the business to maintain an aggregated view of the risk profile of the business, including identifying emerging risks and loss/'near miss events. This ensures that business planning, decision making and operational processes are informed and responsive to change.

  Material changes to existing risks, emerging or internal control failings or weaknesses which require immediate action are the subject of interim reporting and consideration at the appropriate forum, with remedial action implemented with immediate effect.

Risk Reporting Procedures

Risk Owners attend management meetings held three or four times a year. These meetings provide a formal opportunity to discuss existing risks and the effectiveness of controls, as well as any potential emerging risks. Additional discussions with the Risk Officer are held outside of these meetings where required. Any amendments to the Business Risk Assessment proposed by Risk Owners, such as changes to risk descriptions, controls or ratings, are presented to Bar Mutual's Audit & Risk Committee at the first meeting following any amendment.

Risk Owners also identify risk events (e.g. operational risk loss or near miss events) which are reviewed by the Managers Management Committee and then recorded on the Company's Risk Event Database, with remedial actions identified for which a completion date is set. The financial consequences of loss events (including regulatory breaches) are also identified and also whether the circumstances surrounding those events might give rise to a claim on the Managers' E&O policy.

The professional indemnity insurance for the Thomas Miller group of companies is purchased from Windsor Insurance Company Ltd (a wholly-owned subsidiary of Thomas Miller Holdings) and various insurance companies and underwriters at Lloyd's of London. The limit of indemnity is £45m with a deductible of £10,000. Claims are dealt with in the Thomas Miller office in the Isle of Man.

The ORSA overview reports are provided to the Board annually or more frequently, as appropriate, giving information on the Company's recent performance and its risk profile whilst also providing consideration of business planning and scenario testing.

The various aspects of the Risk Management System have been described above. The Risk Management Function is fulfilled by the Company's Risk Officer who oversees risk management; provides independent challenge; and has direct access to the Chairman of the Audit & Risk Committee. The Risk Management Function maintains an organisation-wide and aggregated view of the risk profile of the Company, including monitoring risk tolerances against appetite, and advising on how risks might impact the business singly and in combination. Much of this work is done through stress testing and scenario analysis for the ORSA process in collaboration with the Actuarial Function. Responsibilities of the Risk Management Function are contained in the Company's Risk Management Framework.

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B.3. RISK MANAGEMENT SYSTEM (continued)

The integration of risk management processes with business activities is performed through the requirement for business function heads who are also risk owners on the Business Risk Assessment to focus on risk management on an ongoing basis whilst ensuring that the risks for which they are responsible remain within risk tolerance. This demonstrates the proactive application of risk management techniques to support the business processes and decision-making for which they are also responsible in their day-to-day insurance business activities.

In addition, there is a strong foundation of risk information available as described earlier in this section relating to, for example, the Business Risk Assessment, the risk matrix, the risk appetite statements and preferences and tolerances.

B.4. INTERNAL CONTROL SYSTEM

Internal control is defined as a continually operating process effected by the Company's Board, the Managers, all staff and systems and designed to support the Company in achieving its Business Plan objectives through efficient and effective operations and to protect its resources.

Each Risk Owner, as named in the Business Risk Assessment, is responsible for the application of the Internal Control Framework and the design, development, implementation, documentation and maintenance of effective internal control processes in their area and reporting thereon.

Control activities
Control activities are the actions taken or systems put in place to address business risks, protect assets and ensure that all material control failures and issues are identified and managed. The control activities are embedded into plans, policies, procedures, systems and business processes. Their effectiveness relies on the level of compliance by management and staff.

The nature of the controls implemented and the level of control exercised are based on the assessment of frequency and impact of the risk, the Company's risk appetite and the cost of implementing controls relative to the significance of the risk.

The following controls enforce the above:

- Policies and procedures
- Management information
- System embedded controls
- Premises and System security
- Segregation of duties
- Information processing
- Recruitment, performance management and training
- Contingency plans

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B.4. INTERNAL CONTROL SYSTEM (continued)

The Internal Control Framework as a whole and internal control processes individually are monitored on an ongoing basis through the following mechanisms:

- Performance indicators
- External data
- Analyses and reconciliations
- Regulatory compliance monitoring audits
- Internal audits
- Procedure monitoring audits

Compliance function

The Company takes a risk-based approach to regulatory compliance, focussing on preventing breaches to regulatory principles and other rules and informing the relevant regulators of any that are material, or must be reported to regulators on a mandatory basis.

In all cases of a regulatory breach, the Compliance Function investigates the cause and effect of breach and recommends remedies to the Managers' Management Committee for approval.

The Board bears ultimately responsibility for Regulatory Compliance.

The Compliance Function advises on and promotes compliance with applicable laws, regulatory requirements and administrative provisions and coordinates and monitors implementation of policies, processes and procedures to achieve compliance across the business, and manages regulatory compliance risk.

The Compliance Officer monitors regulatory developments for impacts on the Company. Any amended or new regulations that have a material impact on the Company are recorded in a Regulatory Compliance Manual. Monitoring consists of checks to ensure that required actions are being/have been taken and that policies, processes and procedures are being complied with. The results are logged, reported on to stakeholders and remedial action agreed and implemented as appropriate.

Breaches and associated remedial action are posted to the Risk Events Database. The Compliance Function will alert any regulatory breach, including, where applicable, the cause, effect and recommended remedial action, to the Managers Management Committee, which will approve the remedial action.

Material breaches and breaches that must be reported to regulators on a mandatory basis will be reported to the Board. Regulatory returns are logged on a diary-based Regulatory Database to facilitate their monitoring, reporting and timely completion. The Compliance Function advises the Managers and the Board on how to be and remain compliant as well as to anticipate and plan for changes in regulations.

The Compliance function continues an ongoing basis to improve policies, processes and procedures, develop Regulatory Compliance management information and identify areas for improvement.

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B.5. INTERNAL AUDIT FUNCTION

Internal Audit is the "third line of defence" in the company's internal control framework, established to provide independent assurance that the systems of internal control established by management ("first line") and the monitoring and oversight provided by the Risk Management and Compliance Functions ("second line") are fit for purpose and operating effectively.

The objectives of the Internal Audit Function are to provide independent assurance that business risks are identified and are being appropriately managed and controlled by effective systems of internal control.

The Internal Audit function of the Company is provided by the Managers who employ an independent Head of Internal Audit ("HIA") who in turn reports functionally to the Audit & Risk Committee ("ARC") via its Chairman, and administratively to the Chief Executive Officer ("CEO") of TMH ("the Managers"). The HIA may engage third parties to conduct some Audits under his/her management if it is felt that specific technical skills are required or where insufficient general audit resource is available.

Independence

The Internal Audit Function is independent from the organisational activities audited and free to exercise its assignments without impairment and on its own initiative in all areas. It is not authorised to carry out any operational work on behalf of any area of any business.

Development of Audit plans

The annual risk-based Internal Audit Plan is developed by the Internal Audit Function and is subject to annual review and approval by the ARC. The Plan is designed to provide for all significant auditable activities of the business, based on a number of factors which includes, but are not limited to; (i) the results of the Internal Audit risk assessment; (ii) the last time the area of activity was last audited, and (iii) current or past issues identified in the area of activity.

Engagement Planning

The Internal Audit Function prepares an Audit Planning Memorandum ("APM") for each audit, which describes the scope of the Audit and the key risks to be addressed. Where needed, a formal opening meeting is held, at which the appointed audit team meets relevant line management to discuss the planned audit and agree the scope of work.

The finalised APM is sent to relevant line management and copied to appropriate business executives who have an interest in the outcome of the Audit.

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B.5. INTERNAL AUDIT FUNCTION (continued)

Execution

The audit team is responsible for conducting the fieldwork including performing whatever control evaluation, substantive and compliance testing is deemed necessary. The Internal Auditor leading the assignment discusses any findings as they arise with appropriate management to ensure the factual accuracy of the points being raised and so that any misunderstandings or queries are dealt with as soon as possible.

An 'end of fieldwork' meeting is held to confirm the factual accuracy of any apparent control weaknesses identified during the course of the fieldwork and the recommended remedial action is discussed at this meeting.

Reporting

An Internal Audit report is produced following completion of every Audit engagement. Each report includes details of identified deficiencies, as well as Management's agreed actions to resolve. The agreed actions also include the names of the action owners and the agreed target date for remediation.

All Internal Audit reports are given an overall control rating, which is based on the severity of individual and / or aggregated control deficiencies identified. The overall control ratings are as follows;

Effective
Minor Improvement Required
Moderate Improvement Required
Significant Improvement Required
Not Effective

The method of determining overall control rating for Audit reports and for individual control weaknesses is described in the TMIA Policies and Procedures.

B.6. ACTUARIAL FUNCTION

The Company's Board is ultimately responsible for ensuring an effective Actuarial Function. This function is performed by the Thomas Miller Actuarial Team, led by its Chief Actuary.

The Actuarial Function is independent of the Company's management team and is therefore able to undertake its duties in an objective, fair and independent manner. However, for operational purposes, the Actuarial Function is integrated into the Company's internal control system through its interactions with the management team and attendance at meetings of the Board and Board committees.

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B.6. ACTUARIAL FUNCTION (continued)

The Actuarial Function undertakes all responsibilities as required by Solvency II, including:

- coordinating and overseeing the calculation of Solvency II technical provisions;
- ensuring the appropriateness of the methodologies and underlying models used, as well as the assumptions made in the calculation of technical provisions;
- informing the Board of the reliability and adequacy of the calculation of technical provisions;
- expressing an opinion on the overall underwriting policy;
- expressing an opinion on the adequacy of reinsurance arrangements; and
- contributing to the effective implementation of the risk management system including capital requirements and the ORSA process.

B.7. OUTSOURCING

The Company has in place an Outsourcing Policy which is directed at services or activities which are particularly important or critical to the Company's business (material business activities).

Material business activities include the key functions of the Company's system of governance, i.e. Risk Management, Compliance, Actuarial and Internal Audit, and all functions or activities that are fundamental to enable it to carry out its core business, including underwriting, claims handling and investments.

A material business activity is one that has the potential, if disrupted, to have a significant impact on the Company's business operations or its ability to manage risks effectively.

Management outsourcing

The Company has no internal executive function and its management is wholly outsourced under a management agreement to Thomas Miller Professional Indemnity Limited (the "Managers"), which is a wholly owned subsidiary of Thomas Miller.

In order to comply with its regulatory obligations, the Board has developed monitoring and reporting procedures. The risk control and reporting procedures to be followed by the Managers form part of their obligations under the management agreement.

Investment management outsourcing

Management of the Company's investments is outsourced to Thomas Miller Investment Limited, part of the Thomas Miller group of companies, under an investment management agreement.

The performance of the investment managers is reviewed by the Investment Committee at each of its meetings and the Board receives a report from the Investment Committee at every Board meeting.

Oversight

The Board bears ultimate responsibility for outsourced functions, services, or activities and related governance. The Board is supported by the Management Fee and Oversight Committee, the Audit & Risk Committee and the Managers Management Committee which monitors the activities of the Company, including outsourcing.

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B.8. ANY OTHER INFORMATION

The Company considers that there is no other material information to be disclosed.

C. RISK PROFILE

The key areas of risk affecting the Company can be classified as follows:

- Underwriting Risk
- Market Risk
- Credit Risk
- Liquidity Risk
- Operational Risk

The Company has set out a number of risk appetite statements, which guide the implementation of its Business Plan.

The following sections consider each of the Company's risk categories. The key risks are Underwriting Risk and Market Risk.

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C.1. UNDERWRITING RISK

The Company's main objective is to provide primary layer professional indemnity insurance for self-employed barristers in England and Wales, and all persons regulated by the Bar Standard Board ("BSB"), although, currently, in the absence of a regulatory requirement that all BSB approved entities must insure with the Company, it is only prepared to consider the provision of insurance to single person entities on a year by year basis and to multi person entities on a case by case basis. The Company aims to meet its main objective by providing cover to its insureds at fair and reasonable rates with an outstanding claims handling service.

Underwriting Risk is the risk that the Company's net insurance obligations (i.e. claims less premiums) are different to expectations. The Company considers the risk of existing obligations (Reserve Risk) separately to the risk of future obligations (Premium Risk). The Company uses reinsurance to manage its Underwriting Risk. However, the Company is exposed to the risk that the reinsurers do not pay the claims. This risk is covered under Credit Risk.

Reserve Risk is managed by the Company's Reserving Policy. The Company has a low tolerance for adverse developments in its claims reserves. This is reflected in the claims reserves for statutory accounting purposes. Although the Company is a small entity, there is sufficient volume of data to apply traditional actuarial and statistical methods to project future claims outcomes.

Premium Risk is managed by the Company's Underwriting Policy, which establishes underwriting practices in order to meet business needs and satisfy regulatory control. This is supplemented with business planning and forecasting exercises undertaken as part of the Company's ORSA process.

Risk Mitigation

Underwriting Risk is mitigated by the Company reinsurance programme. The Company has reinsurance cover relating to claims and settlement costs of £250,000 in excess of £500,000 subject to a £500,000 aggregate deductible, £750,000 in excess of £750,000 subject to a £750,000 aggregate deductible and £1,000,000 in excess of £1,500,000. It also has five reinstatements free of additional reinstatement premium. Fees Breakout Cover is included with policy limits of indemnity up to and including £2,500,000 purchased through the Reinsured, £1,500,000 in excess of £3,250,000 ultimate net loss each and every claim, each insured Member.

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C.2. MARKET RISK

Market Risk arises through fluctuations in equity values, interest rates and corporate bond spreads. Such movements will affect not only the Company's investments, but also the value of other assets and liabilities such as claims payments and reinsurance recoveries.

The Company has an Investment Policy in place to manage exposure to its investments, and this is monitored by regular reports from the Investment Managers. Further discussion of this arrangement is provided below under the "prudent person principle".

The following table sets out a breakdown of the Company's assets as reported in the Company's annual financial statements as at 31 March 2026:

	£'000
Fixed income	84,221
Equities & Alternatives	18,714
UCITS	4,654
Other cash with financial institutions	42
Reinsurers' share of gross technical provisions - Claims outstanding	22,237
Debtors arising out of reinsurance operations	1,242
Cash at bank	10,858
Other	1,406
	143,374

The Company's Market Risk is dominated by Fixed Income. This is due to the Company investing 78.43% of its assets in fixed income investments.

The Company's Investment Strategy also allows investment in government and corporate bonds, exposing it to interest rate and spread movements. However, this risk is significantly smaller than that presented by the Company's equity exposure.

Given that the Company's assets and liabilities are all in Pound Sterling, or hedged into sterling, it is not materially exposed to Currency Risk.

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C.2. MARKET RISK (continued)

The prudent person principle
Under the Company's Investment Policy, all of the Company's investments are invested and managed in accordance with the 'prudent person principle', meaning that duties of the Investment Managers are discharged with the care, skill, prudence and diligence that a prudent person acting in a like capacity would use in the conduct of an enterprise of like character and aims. More specifically:

- invested in assets and instruments whose risk can properly be identified, measured, monitored, managed, controlled and reported;
- to ensure the security, quality and liquidity of the portfolio as a whole;
- appropriate to the nature and duration of the Company's insurance liabilities;
- derivative instruments are possible if they contribute to a reduction of risks or efficient portfolio management;
- unlisted investments and assets are kept to prudent levels;
- properly diversified to avoid excessive reliance on any asset, issuer or group, or geographical area.

The Company's funds are invested by the Investment Managers in accordance with parameters set by an Investment Strategy. The Investment Strategy provides a framework to the Investment Managers for the management and stewardship of the Company's investment assets in conformity with the business and investment objectives and sets the parameters within which the Company's assets may be invested. It is considered and approved by the Board on an annual basis and ad hoc as required and is subject to the Company's Investment Policy.

C.3. CREDIT RISK

Credit Risk is the risk of loss in the value of financial assets due to counterparties failing to meet all or part of their obligations.

The following table illustrates aggregate credit risk exposure for financial assets as reported in the Company's annual financial statements. The credit rating bands are provided by independent ratings agencies:

As at 31 March 2026	**AAA/AA**	**A**	**BBB or less or not rated**	**Total**
	£'000	£'000	£'000	£'000
Fixed income	79,090	5,131	-	84,221
Equities & Alternatives	-	-	18,714	18,714
UCITS	4,654	-	-	4,654
Other cash with financial institutions	42	-	-	42
Reinsurers' share of gross technical provisions - Claims outstanding	-	22,237	-	22,237
Debtors arising out of reinsurance operations	-	1,242	-	1,242
Cash at bank	-	10,858	-	10,858
Other	893	-	465	1,358
	84,679	39,468	19,179	143,326

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C.3. CREDIT RISK (continued)

As the Company's claims tend to be small, typically the Company is not exposed to significant reinsurance Counterparty Default Risk. However, if a large claim was to arise, the Company could have a significant reinsurance default exposure. The Company's objective is to reduce Credit Risk through risk management techniques, which are discussed below:

- The reinsurance contract is reviewed annually before renewal.
- Exposure to reinsurance counterparties is mitigated by the Company only placing reinsurances with counterparties which are rated 'A' or better.
- The Company limits any single placement to no more than 25% of the total cover.
- The Company's exposure to default risk is evaluated as part of the ORSA process.

Exposure to debtors is mainly in respect of calls and premium contributions. This is spread over a number of Members and counterparties, which mitigates the risk.

Exposure to bank balances is more concentrated, with two main counterparties. This risk is mitigated by placing funds surplus to normal operational requirements in money market funds and other investments.

C.4. LIQUIDITY RISK

Liquidity Risk is the risk that the Company is unable to make payments as they become due. This is managed by the use of liquid investments and minimum cash holdings required by the Company's Investment Strategy.

The following table provides a maturity analysis of the Company's financial assets representing the date that a contract will mature, amounts are due for payment, or the asset could be realised without significant additional cost as reported in the Company's annual financial statements:

March 2026	**Short term assets**	**1-2 years**	**2-5 years**	**Total**
	£'000	£'000	£'000	£'000
Fixed income	7,445	10,094	66,682	84,221
Equities & Alternatives	18,714	-	-	18,714
UCITS	4,654	-	-	4,654
Other cash with financial institutions	42	-	-	42
Debtors arising from reinsurance contracts	7,465	5,322	9,450	22,237
Debtors arising out of reinsurance operations	1,242	-	-	1,242
Cash at bank	10,858	-	-	10,858
Other	1,406	-	-	1,406
	51,826	15,416	76,132	143,374

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C.4. LIQUIDITY RISK (continued)

Reliance on expected future profit

As the Company is a mutual insurer, it does not aim to make "profit" from its activities. However, surpluses or deficits may arise in the course of its operations due to actual experience being different to expectations.

Given the holding in liquid assets, the Company does not rely on expected future surpluses to ensure its liquidity.

The Company's Solvency II balance sheet as at 31 March 2026 recognises expected future premium of £2.1 million from Members in its technical provisions in respect of outstanding premium income for the 2026/27 policy year. Comparing this to the corresponding expected claims outcome and associated expenses, this premium is expected to produce a surplus of £0.4 million. However, it should be noted that the Solvency II balance sheet does not reflect all future cash flows and the expected surplus (if any) over the year arising from this premium would be lower than this.

C.5. OPERATIONAL RISK

Operational Risk relates to the failure of internal processes, systems or controls due to human or other error.

To mitigate such risks, the Company has engaged Thomas Miller Limited as Managers to document all key processes and controls. This documentation is embedded into the organisation and available to all staff. Compliance with the procedures and controls is audited on a regular basis through the Internal Audit Function, which is directed and reviewed by the Board.

The Company is also protected against operational losses by the Thomas Miller Managers' E&O cover.

C.6. OTHER MATERIAL RISKS

The Company has not identified any other material risk that it considers necessary for disclosure.

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C.7. STRESS AND SCENARIO TESTING

Stress and Scenario Testing

The Company carries out stress and scenario testing as part of its risk management and ORSA process.

The base case financial plan forecast for the next 3 years is used as the starting point for scenario testing. The impacts of adverse scenarios are then evaluated. The Company's latest ORSA report as at March 2026 included consideration of the following scenarios:

- Extreme policy year
- Extreme claims reserve deterioration
- Consecutive bad years
- Extreme downside market scenario
- Pandemic scenario
- Increase to expenses
- Higher general economic inflation
- Recession Scenario
- Combination scenario with adverse experience across all areas

Under each of the scenarios, the Company would still be able to meet its regulatory capital requirements and so this gives comfort that the Company is well capitalised.

In addition, reverse stress testing was carried out, considering scenarios that would lead to a failure of the Company's business plan to allow the Board to assess the robustness of the Company's business model.

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C.8. CONCENTRATION OF RISK

The Company writes large limits and therefore is in theory exposed to a concentration of risk from related claims. This risk is partly mitigated by the Company's reinsurance programme including "clash cover" to allow such related claims to be treated as a single claim for reinsurance purposes.

C.9. ANY OTHER INFORMATION

The Company has not identified any other material information that it considers necessary for disclosure.

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D. VALUATION FOR SOLVENCY PURPOSES

D.1. ASSETS

Valuation of the Company's assets (excluding technical provisions) as at 31 March 2026 in GBP £'000's:

	Solvency II	UK GAAP
Investments (other than assets held for index linked and unit-linked contracts)	108,581	107,631
Insurance and intermediaries receivables	328	328
Reinsurance receivables	137	1,242
Cash and cash equivalents	10,898	10,858
Any other assets not elsewhere shown	50	185
Total	**119,994**	**120,244**

Refer to appendix S.02.01.02 for a full Solvency II balance sheet amounts.

The Company's assets are valued using the following principles:

Investments
Investments are carried at market value. Market value is calculated using the bid price at the close of business on the balance sheet date. The market value of foreign currency investments is translated at the rate of exchange ruling at the balance sheet date.

Fair values of investments traded in active markets are measured at bid price. Where there is no active market, fair value is measured by reference to other factors such as independent valuation reports.

A financial instrument is regarded as quoted in an active market if quoted prices are readily and regularly available from an exchange, dealer, broker, industry group, pricing service or regulatory agency, and those prices represent actual and regularly occurring market transactions on an arm's length basis. If the above criteria are not met, the market is regarded as being inactive.

There is no material differences between the valuation used for Solvency purposes and the valuation used in the Company's financial statements.

Reinsurance receivables
This balance includes short term receivable balances the value and settlement of which contains little to no uncertainty. Due to the short-term nature of these items, the carrying amount is considered to be a suitable proxy for its fair value.

There are no material differences between the valuation used for Solvency purposes and the valuation used in the Company's financial statements.

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D. VALUATION FOR SOLVENCY PURPOSES (continued)

D.1. ASSETS (continued)

Insurance and intermediaries' receivables
These represent balances that are due for existing insurance contracts. Due to the short term nature of these balances, the carrying amount is considered to be a suitable proxy for its fair value.

These amounts are reviewed annually for impairment.

Under statutory accounting requirements, these balances are presented separately on the face of the balance sheet whether they are due or not yet due under reported in note 13 of the Financial Statements.

Also included in this balance is a claim recovery due from third parties reported under note 15.

Cash and cash equivalents
Cash and cash equivalents include cash at bank or in hand, deposits held at call with banks and other short term highly liquid investments. The carrying value of these balances is considered to be a suitable proxy for fair value.

There is no material differences between the valuation used for Solvency purposes and the valuation used in the Company's financial statements.

Any other assets not elsewhere shown
These balances comprise sundry, short term receivables which are classified as Other prepayment and accrued income in the statutory financial statements and tax items within note 15 Other debtors.

Due to the short term nature of these balances, their carrying amount is considered to be a reasonable approximation for fair value.

There are no material differences between the valuation used for Solvency purposes and the valuation used in the Company's financial statements.

D.2. TECHNICAL PROVISIONS

Net technical provisions as at 31 March:

	£'000 2026	**£'000 2025**
		Restate
Gross best estimate	79,197	73,283
Reinsurance best estimate	(14,887)	(10,211)
Risk Margin	2,434	2,264
Net technical provisions	66,744	65,336

Refer to appendices IR.17.01.02 and IR.19.01.21.UY for details on technical provisions.

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D. VALUATION FOR SOLVENCY PURPOSES (continued)

D.2. TECHNICAL PROVISIONS (continued)

The Company's technical provisions are valued using the following principles:

Bases, methods and main assumptions

The technical provisions are valued using the methodology prescribed by the Solvency II Directive and associated regulations. They consist of a "best estimate" of future cash flows (claims, premiums and expenses), which are discounted in line with risk-free interest rates to give the "present value" of those cash flows. Finally, a (market value) "risk margin" is added to take the total to a notional market value (i.e. equivalent to the amount that insurance and reinsurance undertakings would be expected to require in order to take over and meet the insurance and reinsurance obligations).

The calculation of the different elements of the technical provisions is discussed below.

Claims

As the Company only offers professional indemnity cover for self-employed barristers and entities providing barrister-like legal services, all claims are analysed together in one risk group. Standard actuarial techniques are used to project claims cash flows including chain ladder and Bornhuetter-Ferguson methods. The key assumptions relate to the initial expected claims cost for each policy year and the projected notified claims development pattern. These methods are considered appropriate given the longevity and stability of the Company and its claims handling processes.

Allowance is also made for claims corresponding to the premium provision. These are valued using the Company's internal capital model. The key assumptions relate to the expected frequency and severity of future claims.

The future claims cash flows are the most uncertain element of the technical provisions. The uncertainty involved was discussed in section C.1 on Underwriting Risk.

Unexpired risk reserve recognition

The Company has reviewed the accounting for the provision for unexpired risks in respect of insurance contracts in force at the prior year reporting date. The review identified that the provision for claims outstanding at 31 March 2025 required adjustment to reflect the expected cost of claims and related claims handling expenses arising after that date from the run-off insurance available to Members on retirement who are provided with free cover up to a limit of £0.5m.

It was concluded that the adjustment represents a material prior period error. Accordingly, the comparative amounts for the year ended 31 March 2025 have been restated in accordance with FRS 102 and FRS103. The restatement has been reflected in the Statement of Comprehensive Income, the Statement of Financial Position, Statement of change in reserves and the related notes to the financial statements.

The effect of the restatement was to reduce the net assets brought forward at 1 April 2024, increase the net technical provision for claims outstanding at 31 March 2025, reduce free reserves at that date and reduce the surplus for the year ended 31 March 2025. There was no impact on the Company's cash flows.

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D. VALUATION FOR SOLVENCY PURPOSES (continued)

D.2. TECHNICAL PROVISIONS (continued)

Premiums

The premium cash flows in the technical provisions cover the premium receivable but not yet due on bound but not incepted business (corresponding to the premium provision).

Expenses

The technical provisions include expense cash flows incurred in servicing insurance obligations. This includes both direct and overhead expenses, as well as investment management expenses. The provision is calculated directly in respect of the provision for claims outstanding (for expired business) and a corresponding amount is derived in respect of the premium provision (for bound but not incepted business).

Risk margin

The risk margin is calculated based on the requirement to hold capital to meet the Solvency Capital Requirement until all claims liabilities are settled and a prescribed cost-of-capital rate of 4% per annum. This calculation is based on the assumption that a "reference undertaking" takes on the insurance obligations (and associated reinsurance arrangements). The Solvency Capital Requirement in this context is made up of Underwriting Risk, Counterparty Default Risk and Operational Risk only; assets are assumed to be invested in such a way that Market Risk will be zero. The Solvency Capital Requirements in future time periods have been calculated based on the expected run-off of Underwriting Risk and Operational Risk and assuming Counterparty Default Risk runs off in line with the run-off of the best estimate reinsurance recoverables.

Reinsurance recoverables

This relates to the Company's expected recoverables from its reinsurance arrangements at the valuation date. It is made up of two elements: reinsurance recoveries and reinsurance premiums. These are valued on a consistent basis with the corresponding claims and premiums elements of the technical provisions. In addition, an adjustment is made to take account of expected losses due to default of the reinsurance counterparties.

Uncertainty in the technical provisions

The estimation of the ultimate liability arising from claims made under insurance contracts is the Company's most critical estimate. There are several sources of uncertainty that need to be considered in the estimate of the liability that the Company will ultimately pay for such claims. In calculating the estimated liability, the Company uses a variety of estimation techniques based upon statistical analyses of historical experience which assumes past trends can be used to project future developments.

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D. VALUATION FOR SOLVENCY PURPOSES (continued)

D.2. TECHNICAL PROVISIONS (continued)

In particular, the following represents the main sources of uncertainty that may impact the outcome of the Company's technical provisions:

- Certain claims may turn out to be significantly longer or shorter tailed than the whole book leading to an over- or underestimation of claims reserves. There is also uncertainty around the numbers and average cost of these claims.
- There is potential for IBNER to deteriorate to a greater extent than allowed for in the projections.
- New and unexpected claim types could impact the reserving methodology. This is partly allowed for in the Company's provision for events not in data.
- Uncertainty surrounding the development and cash flow patterns may impact the outcome of the Company's technical provisions.

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D. VALUATION FOR SOLVENCY PURPOSES (continued)

D.2. TECHNICAL PROVISIONS (continued)

Differences between GAAP and Solvency II technical provisions

A reconciliation of UK GAAP technical provisions to Solvency II technical provisions is provided below:

	Note	Gross £'000	RI £'000	Net £'000
UK GAAP technical provisions		**68,303**	**22,237**	**46,066**
Eliminate claims margins	1	(5,580)	-	(5,580)
Reinsurance costs	2	-	(1,823)	1,823
Adjustment to expense reserve	3	4,723	-	4,723
Provision for contracts bound but not incepted	4	16,326	(3,910)	20,236
Events not in data	5	833	334	500
Reinsurance counterparty default adjustment	6	-	(4)	4
Effects of discounting	7	(5,409)	(1,947)	(3,462)
Technical provisions before risk margin		79,197	14,887	64,310
Risk margin	1	2,434	-	2,434
Total Solvency II technical provisions		**81,631**	**14,887**	**66,743**

Notes

1. Claims margins and Solvency II risk margin

Since the Solvency II technical provisions figure is a best estimate, margins for prudence are removed under the Solvency II valuation methodology. The Solvency II risk margin is intended to represent a notional market value adjustment as discussed above.

2. Reinsurance costs

These relate to reinstatement costs for historical reinsurance and the adjustment premium for the 2025/26 policy year.

3. Adjustment to expense reserve

Unlike UK GAAP, Solvency II recognises all expense cash flows incurred in serving insurance obligations. This includes both direct and overhead expenses, as well as investment management expenses. As such, an adjustment is made.

4. Provision for contracts bound but not incepted

Solvency II valuation methodology requires contracts to be recognised when the insurer becomes party to the insurance contract. Usually, an undertaking becomes a party to the contract when the contract between undertaking and policyholder is legally formalised.

Nearly all of the Company's policies are coterminous with its financial year. The consequence is that nearly a full year's worth of business is recognised as Bound But Not Incepted ("BBNI") business. A provision on the Solvency II balance sheet, known as the "premium provision", is thus made for future premiums, claims and expenses that relate to BBNI business.

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D. VALUATION FOR SOLVENCY PURPOSES (continued)

D.2. TECHNICAL PROVISIONS (continued)

5. Events not in data

Solvency II requires that all possible outcomes be allowed for when setting the technical provisions. Therefore, an additional provision needs to be made for "events not in data", i.e. potential adverse claims outcomes that have not been observed to date and hence are not taken into account in assessing the claims provisions.

6. Reinsurance counterparty default adjustment

For the Solvency II balance sheet, amounts recoverable from reinsurance counterparties must be adjusted for the expected losses due to counterparty default. This adjustment approximates the expected present value of the losses in the event of default, weighted by the probability of default for each counterparty. Under current accounting bases, a provision for bad debts is only made where there is objective evidence that a counterparty may default on its obligation.

7. Effects of discounting

Since Solvency II technical provisions take into account the time value of money, an adjustment is made for the discounting of all future cash flows, based on risk-free interest rates.

D.3. OTHER LIABILITIES

Valuation of the Company's other liabilities as at 31 March 2026

	Solvency II £'000	**UK GAAP £'000**
Insurance & intermediaries payables	60	60
Reinsurance payables	-	1,823
Any other liabilities not shown elsewhere	387	24,767
	447	26,650

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D. VALUATION FOR SOLVENCY PURPOSES (continued)
D.3. OTHER LIABILITIES (continued)

The Company's other liabilities are valued using the following principles:

Reinsurance payables

These represent balances that are due to be paid for existing reinsurance contracts. When these amounts are not yet due to be paid, they are included as a future cash flow in the calculation of reinsurance technical provisions.

Under statutory accounting requirements, these balances are presented separately on the face of the balance sheet whether they are due or not yet due.

Insurance & intermediaries payables

These represent balances payable on insurance contracts. Due to the short term nature of these balances, the carrying amount is considered a suitable proxy for fair value.

There is no material differences between the valuation used for Solvency II purposes and the valuation used in the Company's financial statements.

Any other liabilities not elsewhere shown

These balances include all sundry payables and accruals. Due to the short term nature of these balances, the carrying amount is considered a suitable proxy for fair value.

The main difference between the valuation used for Solvency II purposes and the valuation used in the Company's financial statements is the inclusion of contributions received in advance of £24.434m in UK GAAP, which in the Solvency II balance sheet is valued as £Nil.

D.4. ALTERNATIVE METHODS OF VALUATION

The Company does not utilise any alternative methods of valuation.

D.5. ANY OTHER INFORMATION

The Company has not identified any other information that it considers material to be disclosed.

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E. Capital Management

E.1 Own funds

	2026	2025 Restated
	£'000	£'000
SCR ratio	223%	209%
SCR	29,643	28,061
Eligible capital	66,067	58,682
Excess / (shortfall)	36,424	30,621
MCR Ratio	588%	543%
MCR	9,178	8,853
Eligible capital	53,944	48,099
Excess / (shortfall)	44,766	39,246
Tier 1 Basic own funds	53,944	48,099
Tier 2 Ancillary own funds	12,123	10,583

As a mutual insurer with no share capital the Company's capital structure consists of two types of own funds:

1. Accumulated income and expenditure account reserve and reconciliation reserve, which falls under Tier 1 and counts as Basic Own Funds ("BOF"). These funds may be fully utilised to meet both the Solvency Capital Requirement ("SCR") and the Minimum Capital Requirement ("MCR").

2. The Company's Rules allow for Basic and Supplementary contributions from members. The Company's practice is to defer collection of some element of the Basic Contribution called premium deferral. The Company retains its right to call upon the premium so deferred. Once they had been received, they would become Tier 1 loss absorbent BOF and therefore count as Tier 2 Ancillary Own Funds for meeting the SCR.

   The PRA has renewed approval to the Company for a method of calculating AOF for a period of three years from 19 July 2025. The method results in AOF of £12.123m as at 31 March 2026.

   Under Solvency II regulations, Ancillary Own Funds are capped at 50% of the SCR. As at 31 March 2026, the calculated AOF of £12.123m is less than 50% of the SCR, so the cap is not applied.

Information, objectives, policies and processes for managing own funds

The Company's objective is to maintain its total capital resources (own funds) in line with its risk appetite statement. This would mean that the capital resources exceed the Company's regulatory requirements. The Company forecasts its capital over a 3-year planning horizon.

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E. Capital Management (continued)

E.1 Own funds (continued)

Material differences between equity as shown in the financial statements and the excess of assets over liabilities

Below represents a reconciliation of UK GAAP reserves to Solvency II reserves.

	2026	2025 Restated
	£'000	£'000
UK GAAP reserves	**48,419**	**40,507**
Solvency II gross technical provisions adjustment	(13,328)	(12,349)
Solvency II RI technical provisions adjustment	(7,350)	(6,335)
Solvency II creditor adjustment	26,203	26,276
Total Solvency II basic own funds	**53,944**	**48,099**

The adjustments to reserves arise from differences in valuation of technical provisions and the creditor adjustment. Refer to D.1 to D.3 for a discussion of the differences between the bases.

E.2 Solvency Capital Requirement and Minimum Capital Requirement

The table below sets out the capital requirements for the Company as at 31 March 2026 together with the results as at 31 March 2025 (restated) for comparison.

	2026	2025 Restated
	£'000	£'000
SCR	**29,643**	**28,061**
Made up of		
Underwriting Risk	22,953	22,832
Market Risk	8,894	6,265
Counterparty Default Risk	1,238	1,348
Operational Risk	2,376	2,198
Diversification effects	(5,818)	(4,582)
MCR	**9,178**	**8,853**

The SCR has been calculated using the Solvency II Standard Formula. It is not subject to supervisory assessment, but it is subject to external audit. The Company does not use any simplifications or undertaking specific parameters to calculate the SCR.

The main risks that drive the SCR are Underwriting Risk and Market Risk. Underwriting Risk stems from the insurance risk that the Company assumes through the course of its normal business activities. Market Risk stems from the Company's investment holdings.

The overall SCR has increased by £1.582m since last year, driven by an increase in Market Risk ,Underwriting Risk and Operation Risk offset by a decrease in Counterparty Default Risk and Diversification effects.

The inputs used to calculate the Company's MCR can be found in appendix IR.28.01.01.

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E.3 Use of the duration-based equity risk sub-module in the calculation of the Solvency Capital Requirement

This sub-module is not used by the Company.

E.4 Differences between the standard formula and any internal model used

The Company uses the Standard Formula for its Solvency Capital Requirement.

E.5 Non-compliance with the Minimum Capital Requirement and non-compliance with the Solvency Capital Requirement

The Company has fully complied with the Minimum Capital Requirement and Solvency Capital Requirement during the period under review.

Refer to section E.1 for results of the Minimum Capital Requirement and Solvency Capital Requirement calculations.

E.6 Any other information

The Company considers there to be no other material information that should be disclosed.

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Bar Mutual Indemnity Fund Limited

Solvency and Financial Condition Report

Disclosures

31 March

2026

(Monetary amounts in GBP thousands)

Docusign Envelope ID: EE2D6E20-F91B-88BB-81C4-70DC53B383B7

General information

Entity name	Bar Mutual Indemnity Fund Limited
Entity identification code and type of code	LEI/213800Y8UJZS294UH118
Type of undertaking	Non-life undertakings
Country of incorporation	GB
Language of reporting	en
Reporting reference date	31 March 2026
Currency used for reporting	GBP
Accounting standards	Local GAAP
Method of Calculation of the SCR	Standard formula
Matching adjustment	No use of matching adjustment
Volatility adjustment	No use of volatility adjustment
Transitional measure on the risk-free interest rate	No use of transitional measure on the risk-free interest rate
Transitional measure on technical provisions	No use of transitional measure on technical provisions

List of reported templates

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IR.02.01.02 - Balance sheet
IR.05.02.01 - Premiums, claims and expenses by country: Non-life obligations
IR.05.04.02 - Non-life income and expenditure : reporting period
IR.17.01.02 - Non-Life Technical Provisions
IR.19.01.21 - Non-Life insurance claims
IR.23.01.01 - Own Funds
IR.25.04.21 - Solvency Capital Requirement
IR.28.01.01 - Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity

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IR.02.01.02

Balance sheet

		Solvency II value
	Assets	C0010
R0030	Intangible assets	
R0040	Deferred tax assets	
R0050	Pension benefit surplus	
R0060	Property, plant & equipment held for own use	0
R0070	Investments (other than assets held for index-linked and unit-linked contracts)	108,581
R0080	*Property (other than for own use)*	0
R0090	*Holdings in related undertakings, including participations*	0
R0100	*Equities*	0
R0110	*Equities - listed*	
R0120	*Equities - unlisted*	
R0130	*Bonds*	85,114
R0140	*Government Bonds*	81,621
R0150	*Corporate Bonds*	3,492
R0160	*Structured notes*	0
R0170	*Collateralised securities*	0
R0180	*Collective Investments Undertakings*	23,468
R0190	*Derivatives*	0
R0200	*Deposits other than cash equivalents*	0
R0210	*Other investments*	0
R0220	Assets held for index-linked and unit-linked contracts	
R0230	Loans and mortgages	0
R0240	*Loans on policies*	0
R0250	*Loans and mortgages to individuals*	
R0260	*Other loans and mortgages*	
R0270	Reinsurance recoverables from:	14,887
R0280	*Non-life and health similar to non-life*	14,887
R0315	*Life and health similar to life, excluding index-linked and unit-linked*	
R0340	*Life index-linked and unit-linked*	
R0350	Deposits to cedants	0
R0360	Insurance and intermediaries receivables	328
R0370	Reinsurance receivables	1,242
R0380	Receivables (trade, not insurance)	137
R0390	Own shares (held directly)	
R0400	Amounts due in respect of own fund items or initial fund called up but not yet paid in	0
R0410	Cash and cash equivalents	10,899
R0420	Any other assets, not elsewhere shown	50
R0500	**Total assets**	136,126

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		Solvency II value
	Liabilities	C0010
R0505	Technical provisions - total	81,631
R0510	*Technical provisions - non-life*	81,631
R0515	*Technical provisions - life*	0
R0542	Best estimate - total	79,197
R0544	*Best estimate - non-life*	79,197
R0546	*Best estimate - life*	
R0552	Risk margin - total	2,434
R0554	*Risk margin - non-life*	2,434
R0556	*Risk margin - life*	
R0565	Transitional (TMTP) - life	
R0740	Contingent liabilities	0
R0750	Provisions other than technical provisions	
R0760	Pension benefit obligations	
R0770	Deposits from reinsurers	
R0780	Deferred tax liabilities	
R0790	Derivatives	100
R0800	Debts owed to credit institutions	
R0810	Financial liabilities other than debts owed to credit institutions	
R0820	Insurance & intermediaries payables	60
R0830	Reinsurance payables	0
R0840	Payables (trade, not insurance)	3
R0850	Subordinated liabilities	0
R0860	*Subordinated liabilities not in Basic Own Funds*	
R0870	*Subordinated liabilities in Basic Own Funds*	0
R0880	Any other liabilities, not elsewhere shown	387
R0900	**Total liabilities**	82,180
R1000	**Excess of assets over liabilities**	53,945

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IR.05.02.01

Premiums, claims and expenses by country: Non-life obligations

		C0010	C0020	C0030	C0040	C0050	C0060	C0070
		Home Country	Top 5 countries (by amount of gross premiums written)					Total Top 5 and home country
R0010								
		C0080	C0090	C0100	C0110	C0120	C0130	C0140
	Premiums written							
R0110	Gross - Direct Business	27,122						27,122
R0120	Gross - Proportional reinsurance accepted							0
R0130	Gross - Non-proportional reinsurance accepted							0
R0140	Reinsurers' share	7,623						7,623
R0200	Net	19,499						19,499
	Premiums earned							
R0210	Gross - Direct Business	27,080						27,080
R0220	Gross - Proportional reinsurance accepted							0
R0230	Gross - Non-proportional reinsurance accepted							0
R0240	Reinsurers' share	7,623						7,623
R0300	Net	19,457						19,457
	Claims incurred							
R0310	Gross - Direct Business	14,605						14,605
R0320	Gross - Proportional reinsurance accepted							0
R0330	Gross - Non-proportional reinsurance accepted							0
R0340	Reinsurers' share	10,106						10,106
R0400	Net	4,499						4,499
R0550	**Net expenses incurred**	11,219						11,219

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IR.05.04.02

Non-life income and expenditure : reporting period

		All business (including annuities stemming from accepted non-life insurance and reinsurance contracts)	All non-life business (ie excluding annuities stemming from accepted insurance and reinsurance contracts)	Non-life insurance and accepted proportional reinsurance obligations									
				Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance - personal lines	Motor vehicle liability insurance - non-personal lines	Motor vehicle other motor insurance - personal lines	Motor vehicle other motor insurance - non-personal lines	Marine, aviation and transport insurance	Fire and other damage to property insurance - personal lines	Fire and other damage to property insurance - non-personal lines
		C0010	C0015	C0110	C0120	C0130	C0140	C0141	C0150	C0151	C0160	C0170	C0180
	Income												
	Premiums written												
R0110	Gross written premiums		27,122										
R0111	Gross written premiums - insurance (direct)		27,122										
R0113	Gross written premiums - accepted reinsurance		0										
R0160	Net written premiums		19,499										
	Premiums earned and provision for unearned												
R0210	Gross earned premiums		27,080										
R0220	Net earned premiums		19,457										
	Expenditure												
	Claims incurred												
R0610	Gross (undiscounted) claims incurred		0										
R0611	Gross (undiscounted) direct business		0										
R0612	Gross (undiscounted) reinsurance accepted		0										
R0690	Net (undiscounted) claims incurred		0										
R0730	Net (discounted) claims incurred	4,499	0										
	Analysis of expenses incurred												
R0910	Technical expenses incurred net of reinsurance ceded	11,823											
R0985	Acquisition costs, commissions, claims management costs	10,460	10,460										
	Other expenditure												
R1140	Other expenses	0											
R1310	**Total expenditure**	17,500											

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IR.05.04.02

Non-life income and expenditure : reporting period

		Non-life insurance and accepted proportional reinsurance obligations								Accepted non-proportional reinsurance					
		General liability insurance				Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Health	Casualty	Marine, aviation and transport	Property	Annuities stemming from non-life insurance contracts	Annuities stemming from non-life accepted reinsurance contracts
		Employers Liability	Public & products Liability	Professional Indemnity	Other general liability										
		C0190	C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0310	C0320	C0330	C0340	C0525	C0545
	Income														
	Premiums written														
R0110	Gross written premiums	0	0	27,122	0										
R0111	Gross written premiums - insurance (direct)	0	0	27,122	0										
R0113	Gross written premiums - accepted reinsurance	0	0	0	0										
R0160	Net written premiums	0	0	19,499	0										
	Premiums earned and provision for unearned														
R0210	Gross earned premiums	0	0	27,080	0										
R0220	Net earned premiums	0	0	19,457	0										
	Expenditure														
	Claims incurred														
R0610	Gross (undiscounted) claims incurred	0	0	0	0										
R0611	Gross (undiscounted) direct business	0	0	0	0										
R0612	Gross (undiscounted) reinsurance accepted	0	0	0	0										
R0690	Net (undiscounted) claims incurred	0	0	0	0										
R0730	Net (discounted) claims incurred														
	Analysis of expenses incurred														
R0910	Technical expenses incurred net of reinsurance ceded														
R0985	Acquisition costs, commissions, claims management costs	0	0	10,460	0										
	Other expenditure														
R1140	Other expenses														
R1310	**Total expenditure**														

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IR.17.01.02

Non-Life Technical Provisions

		Direct business and accepted proportional reinsurance												Accepted non-proportional reinsurance				Total Non-Life obligation
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance	
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180
	Best estimate																	
	Premium provisions																	
R0060	Gross								19,091									19,091
R0140	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default								-3,910									-3,910
R0150	**Net Best Estimate of Premium Provisions**								23,000									23,000
	Claims provisions																	
R0160	Gross								60,106									60,106
R0240	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default								18,797									18,797
R0250	**Net Best Estimate of Claims Provisions**								41,310									41,310
R0260	**Total best estimate - gross**								79,197									79,197
R0270	**Total best estimate - net**								64,310									64,310
R0280	**Risk margin**								2,434									2,434
R0320	**Technical provisions - total**								81,631									81,631
R0330	**Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total**								14,887									14,887
R0340	**Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total**								66,743									66,743

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IR.19.01.21

Non-Life insurance claims

Total Non-life business

Z0020 Accident year / underwriting year: Underwriting year

Gross Claims Paid (non-cumulative)
(absolute amount)

	Year	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0170	C0180
		Development year											In Current year	Sum of years (cumulative)
		0	1	2	3	4	5	6	7	8	9	10 & +		
R0100	Prior											640	640	640
R0160	-9	1,406	3,341	4,334	2,953	715	167	120	367	416	69		69	13,886
R0170	-8	728	4,058	5,671	2,251	1,580	1,297	1,421	271	567			567	17,843
R0180	-7	986	1,904	3,545	3,055	5,937	4,079	2,932	53				53	22,491
R0190	-6	1,324	8,037	3,862	2,974	2,084	676	469					469	19,426
R0200	-5	941	2,144	3,261	1,396	1,556	4,274						4,274	13,573
R0210	-4	884	1,934	1,042	776	717							717	5,352
R0220	-3	727	2,961	2,180	1,248								1,248	7,115
R0230	-2	628	3,376	4,236									4,236	8,240
R0240	-1	778	3,937										3,937	4,715
R0250	0	902											902	902
R0260												Total	17,112	114,184

Gross Undiscounted Best Estimate Claims Provisions
(absolute amount)

	Year	C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0360
		Development year											Year end (discounted data)
		0	1	2	3	4	5	6	7	8	9	10 & +	
R0100	Prior											1,042	1,020
R0160	-9	10,526	11,618	7,936	3,484	1,503	676	748	629	240	194		185
R0170	-8	15,428	13,078	7,910	4,429	2,303	2,439	1,900	1,177	740			700
R0180	-7	15,400	10,504	7,497	7,883	6,954	4,271	1,104	416				391
R0190	-6	18,198	20,105	13,208	9,338	7,004	4,536	3,473					3,267
R0200	-5	14,571	9,057	5,793	6,247	7,000	1,075						1,014
R0210	-4	12,878	7,925	6,386	4,147	5,485							5,129
R0220	-3	17,683	12,989	5,186	3,746								3,470
R0230	-2	18,574	13,667	11,612									10,702
R0240	-1	20,446	16,337										14,933
R0250	0	21,394											19,296
R0260												Total	60,106

Gross premium

		C0570	C0580
		Gross earned premium at reporting reference date	Estimate of future gross earned premium
R0160	N-9	0	0
R0170	N-8	0	0
R0180	N-7	0	0
R0190	N-6	0	0
R0200	N-5	0	0
R0210	N-4	0	0
R0220	N-3	0	0
R0230	N-2	0	0
R0240	N-1	0	0
R0250	N	0	0

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IR.23.01.01

Own Funds

		Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
R0010	Ordinary share capital (gross of own shares)	0	0		0	
R0030	Share premium account related to ordinary share capital	0	0		0	
R0040	Initial funds, members' contributions or the equivalent basic own-fund item for mutual and mutual-type undertakings	0	0		0	
R0050	Subordinated mutual member accounts	0		0	0	0
R0070	Surplus funds	0	0			
R0090	Preference shares	0		0	0	0
R0110	Share premium account related to preference shares	0		0	0	0
R0130	Reconciliation reserve	53,945	53,945			
R0140	Subordinated liabilities	0		0	0	0
R0160	An amount equal to the value of net deferred tax assets	0				0
R0180	Other own fund items approved by the supervisory authority as basic own funds not specified above	0	0	0	0	0
R0220	**Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds**	0				
R0290	**Total basic own funds**	53,945	53,945	0	0	0
	Ancillary own funds					
R0300	Unpaid and uncalled ordinary share capital callable on demand	0				
R0310	Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	12,123			12,123	
R0320	Unpaid and uncalled preference shares callable on demand	0				
R0330	A legally binding commitment to subscribe and pay for subordinated liabilities on demand	0				
R0340	Letters of credit and guarantees	0				
R0350	Letters of credit and guarantees other	0				
R0360	Supplementary members calls	0				
R0370	Supplementary members calls - other	0				
R0390	Other ancillary own funds	0				
R0400	**Total ancillary own funds**	12,123			12,123	0
	Available and eligible own funds					
R0500	Total available own funds to meet the SCR	66,068	53,945	0	12,123	0
R0510	Total available own funds to meet the MCR	53,945	53,945	0	0	
R0540	Total eligible own funds to meet the SCR	66,068	53,945	0	12,123	0
R0550	Total eligible own funds to meet the MCR	53,945	53,945	0	0	
R0580	**SCR**	29,642				
R0600	**MCR**	9,178				
R0620	**Ratio of Eligible own funds to SCR**	222.88%				
R0640	**Ratio of Eligible own funds to MCR**	587.75%				

		C0060
	Reconcilliation reserve	
R0700	Excess of assets over liabilities	53,945
R0710	Own shares (held directly and indirectly)	0
R0720	Foreseeable dividends, distributions and charges	
R0725	Deductions for participations in financial and credit institutions	
R0730	Other basic own fund items	0
R0740	Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	0
R0760	**Reconciliation reserve**	53,945

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IR.25.04.21

Solvency Capital Requirement

Net of loss absorbing capacity of technical provisions

		C0010
	Market risk	
R0070	Interest rate risk	2,398
R0080	Equity risk	8,289
R0090	Property risk	0
R0100	Spread risk	355
R0110	Concentration risk	88
R0120	Currency risk	17
R0125	Other market risk	
R0130	Diversification within market risk	-2,254
R0140	**Total Market risk**	8,894
	Counterparty default risk	
R0150	Type 1 exposures	0
R0160	Type 2 exposures	0
R0165	Other counterparty risk	
R0170	Diversification within counterparty default risk	1,238
R0180	**Total Counterparty default risk**	1,238
	Life underwriting risk	
R0190	Mortality risk	
R0200	Longevity risk	
R0210	Disability-Morbidity risk	
R0220	Life-expense risk	
R0230	Revision risk	
R0240	Lapse risk	
R0250	Life catastrophe risk	
R0255	Other life underwriting risk	
R0260	Diversification within life underwriting risk	
R0270	**Total Life underwriting risk**	0
	Health underwriting risk	
R0280	Health SLT risk	
R0290	Health non SLT risk	
R0300	Health catastrophe risk	
R0305	Other health underwriting risk	
R0310	Diversification within health underwriting risk	
R0320	**Total Health underwriting risk**	0
	Non-life underwriting risk	
R0330	Non-life premium and reserve risk (ex catastrophe risk)	18,264
R0340	Non-life catastrophe risk	9,755
R0350	Lapse risk	3,000
R0355	Other non-life underwriting risk	
R0360	Diversification within non-life underwriting risk	-8,067
R0370	**Non-life underwriting risk**	22,952
R0400	**Intangible asset risk**	
	Operational and other risks	
R0422	Operational risk	2,376
R0424	Other risks	
R0430	**Total Operational and other risks**	2,376
R0432	**Total before all diversification**	44,543
R0434	Total before diversification between risk modules	35,461
R0436	Diversification between risk modules	-5,819
R0438	**Total after diversification**	29,642
R0440	Loss absorbing capacity of technical provisions	
R0450	Loss absorbing capacity of deferred tax	
R0455	Other adjustments	
R0460	**Solvency capital requirement including undisclosed capital add-on**	29,642
R0472	Disclosed capital add-on - excluding residual model limitation	
R0474	Disclosed capital add-on - residual model limitation	
R0480	**Solvency capital requirement including capital add-on**	29,642
R0490	Biting interest rate scenario	
R0495	Biting life lapse scenario	

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IR.28.01.01

Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity

	Linear formula component for non-life insurance and reinsurance obligations	C0010
R0010	MCR_{NL} Result	9,178

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
		C0020	C0030
R0020	Medical expense insurance and proportional reinsurance	0	
R0030	Income protection insurance and proportional reinsurance	0	
R0040	Workers' compensation insurance and proportional reinsurance	0	
R0050	Motor vehicle liability insurance and proportional reinsurance	0	
R0060	Other motor insurance and proportional reinsurance	0	
R0070	Marine, aviation and transport insurance and proportional reinsurance	0	
R0080	Fire and other damage to property insurance and proportional reinsurance	0	
R0090	General liability insurance and proportional reinsurance	64,310	19,499
R0100	Credit and suretyship insurance and proportional reinsurance	0	
R0110	Legal expenses insurance and proportional reinsurance	0	
R0120	Assistance and proportional reinsurance	0	
R0130	Miscellaneous financial loss insurance and proportional reinsurance	0	
R0140	Non-proportional health reinsurance	0	
R0150	Non-proportional casualty reinsurance	0	
R0160	Non-proportional marine, aviation and transport reinsurance	0	
R0170	Non-proportional property reinsurance	0	

	Linear formula component for life insurance and reinsurance obligations	C0040
R0200	MCR_L Result	0

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
		C0050	C0060
R0210	Obligations with profit participation - guaranteed benefits		
R0220	Obligations with profit participation - future discretionary benefits		
R0230	Index-linked and unit-linked insurance obligations		
R0240	Other life (re)insurance and health (re)insurance obligations		
R0250	Total capital at risk for all life (re)insurance obligations		

	Overall MCR calculation	C0070
R0300	Linear MCR	9,178
R0310	SCR	29,642
R0320	MCR cap	13,339
R0330	MCR floor	7,411
R0340	Combined MCR	9,178
R0350	Absolute floor of the MCR	3,500
R0400	**Minimum Capital Requirement**	9,178