

**AMTRUST EUROPE LIMITED** (Company Number: 01229676)

**Section 172 statement for the year ended 31 December 2022**

It is the duty of the Directors to protect the sustainability of the Company, as well as, the best interests of its various stakeholders. These stakeholders include:

- Policyholders;
- Coverholders;
- Regulators and other Government agencies;
- Suppliers;
- Employees;
- Communities and the environment in which the Company operates;
- Other AmTrust Group companies; and
- The ultimate shareholder, Evergreen Parent GP, LLC.

Therefore, in making key decisions the Directors and Management review and challenge the potential impact of recommended actions to reach an agreed executable plan designed to balance the interests of all impacted parties.

In order to achieve this objective, the Directors have had regard to the matters set out in Section 172(1) (a) to (f) of the Companies Act 2006 by taking the following interests into consideration where applicable:

- **Policyholders** – delivering an insurance product designed to benefit the insured at a cost-effective premium by ensuring that both the Company and the coverholders who underwrite on the Company's behalf comply with all FCA mandated customer conduct rules. Other considerations with regard to policyholders include: maintaining high service standards for customer claims and complaints received and processed either through the Company's own employees or its service providers; setting appropriate liquidity and capital targets to ensure the Company remains in a position to honour all eligible claims as and when they fall due over the life of the policies; and facilitating a reasonable level of competition in the local marketplace to ensure prospective policyholders have access to adequate insurance coverage where required.
- **Coverholders** – sustaining a consistent suite of insurance products desired by the marketplace with competitive terms and conditions. Other considerations with regard to coverholders include offering a well-designed and managed delegated underwriting system and maintaining a reputation for high standards of business conduct.
- **Regulators and other Government agencies** – ensuring long-term sustainability of the Company through the adherence to proper stand-alone governance practices and conduct rules, maintenance of appropriate solvency and liquidity positions in accordance with the Solvency II Directive and compliance with all local regulations and tax requirements. In addition, facilitating a reasonable level of competition in the local marketplace to ensure prospective policyholders have access to adequate insurance coverage where required.
- **Suppliers** – establishing trading relationships on fair and reasonable terms based on local market norms and ensuring clear and timely communication of any relevant business changes which might impact the Company's trading relationship or ability to fully honour its commitments to them under these arrangements.

- **Employees** – the Directors consider the Company’s employees to be one of their most important assets and actively work to solicit their input and consider their views and interests in all of the Company’s decision making.

This is achieved through:

- o Fostering a culture of openness and inclusivity where employees feel comfortable and are encouraged to share their insights and opinions on issues facing the Company;
- o Establishing various forums to share information with the employees and solicit their feedback and concerns. A few examples of this include the publication on the Company’s intranet site of all policies, the Own Risk and Solvency Assessment (‘ORSA’) report and Business Plan, as well as, conducting Town Hall Meetings hosted by the CEO on a regular basis where Management and employees can discuss the financial and business results and major issues facing the Company;
- o Conducting employee surveys. In 2019, the Company conducted its first employee survey to solicit feedback from all employees on an anonymous basis addressing specific topics such as the Company’s culture, leadership and engagement and treatment of employees. A follow up survey was completed in 2021 and another is planned for 2023;
- o Conducting exit interviews for employees leaving the Company and sharing this feedback with Management on a quarterly basis; and
- o Human Resources regularly participating in the Company’s Executive Committee Meetings and Board and Board Committee Meetings, where appropriate.

In addition, the Company’s employees are eligible to participate in an annual discretionary bonus programme. The determination of the amounts eligible to be distributed as part of this bonus programme (the ‘Bonus Pool’) has two components, business performance versus the approved business plan and performance of the Company against agreed goals during the period. The allocation of the Bonus Pool to each eligible individual employee is based on the employee’s individual contribution towards achieving their goals. These individual employee goals are derived such that the employee contributes towards the Company achieving its overall goals.

- **Communities and environment** – ensuring the Company acts as a good corporate citizen within the communities it serves and offers products which promote environmentally conscious actions from its insureds.
- **Other AmTrust Group companies** – where the Company uses services from or provides services to other members of the AmTrust Group, establishing terms equivalent to those available to/from other similar suppliers in the local marketplace. In addition, when underwriting insurance policies or procuring services from either third parties or other AmTrust Group companies where the transaction results in additional benefits to the overall AmTrust Group, ensuring the transaction is not outside of the Company’s agreed risk appetites.
- **Ultimate shareholder** – providing a long-term sustainable enterprise through which the AmTrust Group can grow in its targeted insurance markets while maintaining capital self-sufficiency and future dividend capabilities. In addition, maintaining the AmTrust Group’s reputation for high standards of business conduct.

## Approval

This report was approved on behalf of the Board.