

**Wilton Reinsurance Bermuda Limited**  
**Reporting Period January 1, 2020 to December 31, 2020**

## FINANCIAL CONDITION REPORT

### Introduction

Wilton Reinsurance Bermuda Limited (“the Company”) was incorporated under the laws of Bermuda on December 17, 2004. The Company’s registered office is currently located at 14 Par-La-Ville Road, Hamilton, Bermuda. The Company holds a Long-Term Insurer License Class E under the Bermuda Insurance Act of 1978 (“the Act”) and may reinsure the long-term risk of its Wilton Re affiliates and unrelated third parties. As at December 31, 2020, 96% of the Company shares were owned by Wilton Re Ltd. (“WRL”), a holding company domiciled in Nova Scotia, Canada, and 4% of the Company shares were owned by Wilton Re U.S. Holdings, Inc., a holding company domiciled in Delaware, USA.

The Company’s financial condition report (the “Report”) has been prepared in accordance with Schedule I of the Bermuda Insurance (Public Disclosure) Rules 2015. The Report provides the particulars of the following matters: business and performance, governance structure, risk profile, solvency valuation and capital management, and subsequent events.

### 1. Business and Performance

a.	Insurer	Wilton Reinsurance Bermuda Limited (“WREB”)
	Insurance Group	Wilton Re
b.	Insurance Supervisor:	Bermuda Monetary Authority (“BMA”)
	Name and contact information	Joel Mwaura, (441) 278-0287, <a href="mailto:jmwaura@bma.bm">jmwaura@bma.bm</a>
c.	Approved auditor and jurisdiction	Deloitte Ltd., Bermuda
	Name and contact information	Muhammad Khan, (441) 299-1357, <a href="mailto:muhammad.khan@deloitte.bm">muhammad.khan@deloitte.bm</a>
d.	Ownership	96% shares owned by Wilton Re Ltd. and 4% shares owned by Wilton Re U.S. Holdings, Inc.
e.	Corporate structure charts	See <b>Exhibit 1</b>

## f. Gross written premium by segment:

<b>Segment 2020</b>	<b>Gross Premium (in \$000's)</b>
Mortality	185,283
Longevity	0
Deferred Annuity	106
Disability	<u>16,403</u>
<b>Total</b>	<b>201,793</b>
<b>Gross written premium by country:</b>	
United States	<b>201,793</b>

## g. Performance of investments by asset class (excludes cash):

<b>Security type 2020</b>	<b>Market Value (in \$millions)</b>	<b>Market Yield</b>
U.S. Government Bonds	2,520.9	1.59%
U.S. Government Agency MBS	361.2	1.70%
U.S. Government Agencies	1,010.1	1.77%
Non-U.S. Government	180.8	2.83%
Municipal Bonds	990.7	2.36%
Corporate Securities	10,754.8	3.33%
Asset Backed Securities	1,483.0	4.33%
Residential MBS	197.4	3.75%
Commercial MBS	305.4	3.75%
Commercial Mortgage Loans	1,044.7	2.21%
Preferred Stock	162.0	3.11%
<u>Other</u>	<u>206.8</u>	<u>0.01%</u>
<b>Total Assets</b>	<b>19,217.8</b>	<b>2.92%</b>

**Marketing and Operating Expenses - 2020**

Expenses for the year are comprised of the following components:

	<i>(in \$000's)</i>
Employee expenses	8,545.6
Building costs	103.0
Legal and professional fees	1,169.0
Contract resources and outsourced services	9,235.9
Systems costs	102.5
<u>Other</u>	<u>518.1</u>
<b>Total Marketing and Operating Expenses</b>	<b>19,674.1</b>

**Income 2020**

Income for the year is comprised of the following major components:

<b>Revenue</b>	<i>(in \$000's)</i>
Net premiums and policy fees	201,784
Net investment income	703,772
Other income	1,398,026
<b>Total Revenue</b>	<b>2,303,582</b>
<b>Expenses</b>	
Claims and policy benefits	1,119,787
Interest credited to interest sensitive contracts	233,462
Acquisition and other insurance expenses	330,244
Marketing and operating expenses	19,674
<b>Total Expenses</b>	<b>1,703,167</b>
<b>Total Net Income Before Tax</b>	<b>600,415</b>
<b>Income Tax</b>	<b>125,765</b>
<b>Total Net Income After Tax</b>	<b>474,650</b>

**h. Significant events during reporting period**i. Liquidity Facilities

On March 17, 2020, WREB's parent WRL drew \$500 million from its Wells Fargo Facility II. The Company has elected a 6-month LIBOR interest period plus the applicable margin of 1.25%. The \$500 million was repaid in full during 2020. In September 2020, the Company renewed its \$500 million 364-Day Credit Facility on generally the same terms as the prior year.

ii. Board of Directors

On March 26, 2020, Ryan Selwood resigned from the Company board of directors. Mr. Selwood was replaced as Chair of the Board by Sylvia Oliveira.

iii. Dividends

On March 26, 2020, the Company declared a dividend of \$400 million payable to its shareholders, Wilton Re Ltd and Wilton Re U.S. Holdings, Inc. The dividend was paid in cash and fixed income securities by April 6, 2020. On October 1, 2020, the Company declared a dividend of \$145 million payable to its shareholders, Wilton Re Ltd and Wilton Re U.S. Holdings, Inc. The dividend was paid in cash and fixed income securities by October 6, 2020.

iv. COVID-19

As a result of the spread of COVID-19 globally, the World Health Organization declared a global emergency on January 30, 2020. The COVID-19 pandemic has had a material adverse effect on global, national and local economies. To date, the pandemic has not materially adversely affected the Company's business or prospects taken as a whole.

## 2. Governance Structure

### a. Board and Senior Executives

The Company's business is managed under the supervision of its Board of Directors (the "Board"). The Board is comprised of the Chief Executive Officer ("CEO") and three outside directors. All of the outside directors are also directors of Wilton Re Ltd. ("WRL"), the ultimate controlling parent of the Company, and are executives of Canada Pension Plan Investment Board ("CPPIB"), the majority shareholder of WRL.

The Board is responsible for setting appropriate strategies and the oversight of the implementation of these strategies. The Board also is responsible for ensuring that Company management establishes a framework to implement the Company's strategic business objectives. The Board is responsible for providing suitable prudential oversight of the Company's risk management and internal controls framework, including any activities and functions which are delegated or outsourced. The Board is governed by the Company bye-laws and fulfills all the oversight responsibilities listed in Section 4.2 *Oversight Responsibilities of the Board* of the Bermuda Insurance Code of Conduct.

The Company employs four Bermuda resident professionals: CEO, CFO, actuarial associate and in-house corporate counsel. The CEO is a qualified actuary with over 25 years of experience in the life insurance industry. The CFO is a qualified chartered accountant with over 17 years of experience, 14 of which are in the life insurance industry. The CEO and CFO oversee the day-to-day management of the Company, the CEO acts as the Company's principal representative in accordance with the Bermuda Insurance Act. The CEO, along with the Company's Board of Directors, is responsible for oversight of all aspects of the Company's operations and the CFO is the Company's senior executive responsible for internal audit. The CEO and CFO fulfill all of the responsibilities listed in Section 4.3 *Responsibility of the Chief and Senior Executives* of the Bermuda Insurance Code of Conduct. The in-house corporate counsel, a practicing Bermuda attorney, provides advice on compliance and Bermuda legal issues affecting the Company, and the actuarial associate provides pricing and valuation support.

For the Wilton Re group, the annual incentive compensation and the long-term incentive program are driven by the group's earnings and embedded value, as well as the accomplishment of qualitative goals that cascade from the enterprise level down to individual goals. The embedded value calculation takes actual experience into account, which encourages a risk-based focus on the origination of new deals and maintenance of closed deals.

### b. Fit and Proper Requirements

Executive employees are vetted by the Company Board and the parent company's Compensation Committee. The parent company periodically engages industry experts to conduct Board performance assessments. Descriptions of the professional qualifications, skills and expertise of the Board and senior executive are as follows:

Sylvia Oliveira, chair and director, serves as the CEO and Principal Representative of Wilton Reinsurance Bermuda Limited, where she is responsible for oversight of all aspects of the Wilton Re Bermuda operations. She also serves as the group Chief Risk Officer, where she is responsible for the enterprise risk management of the Wilton Re group. She has 30 years of

experience in the life insurance industry, including senior management, actuarial and investment roles at Chubb (ACE) Tempest Life Reinsurance Ltd, Annuity & Life Re, and John Hancock Mutual Life Insurance Company. Ms. Oliveira is also Chair and CEO of Wilton Re Overseas Limited and sits on the board of Wilton Re (Canada) Limited. She currently chairs the board of Bermuda International Long Term Insurers and Reinsurers Association (BILTIR) and serves on the board of Association of Bermuda International Companies (ABIC). She is a Fellow of the Society of Actuaries (FSA) and a CFA Charterholder, and she holds a B.A. and an M.A. in Mathematics, both from Boston University.

Rossitsa Stoyanova, non-executive director, is Managing Director, Head of Portfolio Design. Ms. Stoyanova previously led the asset class research for existing and potential areas of investment in the public and private markets, including hedge funds, private equity, infrastructure, credit and natural resources, as part of CPPIB's Total Portfolio Management department. Prior to joining CPPIB, Ms. Stoyanova was at GE Energy Financial Services in Stamford, Connecticut, where she was responsible for due diligence as well as structuring and negotiating acquisitions in the power sector. Ms. Stoyanova also worked in Assurance and Advisory Services at Deloitte & Touche in Chicago. She holds an MBA from the Kellogg School of Management at Northwestern University and a BBA from Saint Mary's College, Indiana. Ms. Stoyanova joined the boards of Wilton Reinsurance Bermuda Limited, Wilton Re Overseas Limited and Wilton Re Ltd. in April 2019. Ms. Stoyanova is a member of the WRL Compensation and Investment Committees.

Devon Kirk, non-executive director, is Senior Principal, Americas Structured Credit & Financials. Prior to joining CPP Investment Board in August 2011, Ms. Kirk was an Associate at Linklaters in London, where she focused on M&A and capital markets. Prior to that, she was a member of BMO's M&A team in Chicago. Ms. Kirk holds a J.D. from Harvard Law School and a B. Comm from McGill University. She is a member of the New York State Bar and a CFA Charterholder and currently serves on the board of Wilton Re Ltd. Ms. Kirk is a member of the WRL Compensation and Investment Committees.

Brendan Kemp, senior executive, serves as the CFO of Wilton Reinsurance Bermuda Limited. Prior to joining Wilton Re, Mr. Kemp has served as Chief Financial Officer and Principal Representative of Legal & General Reinsurance Company Ltd. He further acted as Chief Risk Officer of Legal & General during the initial build out of the company. Prior to Legal & General, Mr. Kemp was Vice President of Finance at Northstar Financial Services Bermuda Ltd. and held previous roles with PricewaterhouseCoopers and BDO. He has over 17 years of experience of which 14 have been focused on the Bermuda life insurance industry. Mr. Kemp is a registered Chartered Accountant in Bermuda and South Africa. He holds a Bachelor of Commerce – Honors Theory of Accounting Science from the University of Pretoria. Mr. Kemp is also responsible for oversight of all financial and internal audit aspects of the Wilton Re Bermuda operations.

**c. Risk Management and Solvency Self-Assessment**

The Company's risk management is governed as part of the overall Wilton Re group ("Wilton Re"). Risk management is an integral part of Wilton Re's business processes and decision-making. Wilton Re's risk management framework has a goal of maximizing its ability to achieve its business objectives by creating a systematic and disciplined approach to identifying, measuring, monitoring and reporting on material risks.

Wilton Re is committed to maintaining a rigorous and comprehensive risk management framework that is embedded in all decision-making processes. Functional heads are responsible for day-to-day risk management activities, senior management and the Chief Risk Officer (“CRO”) are responsible for facilitating sound risk management practices, and the board and audit functions are responsible for reviewing the effectiveness of the risk controls and risk management practices. The design and operating effectiveness of the framework are subject to review by internal audit, external independent audit and our embedded value processes. Internal controls are thoroughly tested and the key controls are currently subject to an independent validation in connection with Sarbanes-Oxley Section 404.

Risk management activities are embedded within Wilton Re’s approach to diligence, risk acceptance, and capital deployment. Wilton Re’s senior management and the WRL Board of Directors regularly review its risk profile to ensure its risk appetite is aligned with its business strategy and risk-return profile.

Wilton Re has established an Own Risk and Solvency Assessment (“ORSA”) process, which prescribes regular assessments of its risk profile, the adequacy of its risk management framework, and assessments of its current and projected future solvency positions. Assessments of all material risks associated with its business plan, and the sufficiency of capital resources to support those risks, are conducted on a quarterly basis at a minimum. Management has established and maintains policies, procedures and controls to appropriately manage and mitigate its material risks.

Wilton Re has documented its risk management policies and procedures in the Wilton Re Enterprise Risk Management (“ERM”) Policy. This document demonstrates the Company’s adherence to requirements and standards mandated in the Bermuda Insurance Code of Conduct’s Risk Management section. The Wilton Re ERM Policy outlines the ERM framework, which includes the processes and polices for risk appetite and risk tolerances, risk identification and categorization, risk assessment, risk monitoring, risk management and risk reporting. The ERM Policy is reviewed by the WRL Board annually as part of the ORSA process. The ORSA process ensures that Wilton Re’s ERM framework is adequate and appropriate for the group’s size and complexity.

As part of the first phase of the ORSA process, Wilton Re establishes and maintains a Risk Appetite Statement that aligns with Wilton Re’s business strategy. Using this Risk Appetite Statement as a guide, Wilton Re seeks and accepts exposures to certain risks in pursuit of its business objectives. Wilton Re is focused on core life insurance business, which leads to an appetite for mortality, longevity, morbidity and lapse risk. Wilton Re also accepts exposure to credit risk, interest rate risk and the associated operational risks.

In the second phase of Wilton Re’s ORSA process, Wilton Re’s risk exposures are measured and assessed in accordance with the established ERM framework. In the third phase of the ORSA process, available capital is assessed relative to the capital required to meet its business objectives, given its current risk exposures. Capital adequacy is also assessed in the future and under stress scenarios. Each phase of the ORSA process provides output that feeds back into the other phases of the process. The nature of Wilton Re’s efficient management structure allows for this feedback loop to function quickly and efficiently.

On a quarterly basis, the CRO prepares a risk report for WRL, which is approved by WRL senior executives and presented to the WRL Board. Each year, the results of the Wilton Re ORSA process are summarized into an ORSA Summary Report, which is provided to the Company Board for review and approval and is submitted to the Company's regulators as well as Wilton Re's group supervisor.

**d. Internal Controls**

The internal control system for WREB is managed by the group's Internal Audit department, with oversight from the parent company's Audit Committee. Appropriate and relevant internal controls covering the key risk monitoring activities are established by the WREB CFO and are monitored and tested by the Internal Audit department. All key controls are tracked by Internal Audit on an interactive spreadsheet which requires quarterly signoffs by each control owner to verify that the controls are up-to-date and are performed in a timely fashion. The Company also participates in the Wilton Re group's Sarbanes-Oxley IC certification process which cover all financial reporting controls.

The WREB CEO is responsible for regulatory compliance. As chair of the BILTIR Association, the WREB CEO remains closely tied to all Bermuda regulatory matters to ensure compliance with current and upcoming rules and regulations. In addition, the Company employs a full time in-house legal counsel who is well-versed in Bermuda law.

**e. Internal Audit**

The Company's internal audit function is managed by the WREB CFO, with support from the group's Internal Audit department and oversight from the parent company's Audit Committee. The internal audit process involves the establishment, review and maintenance of controls and procedures that provide assurance to management, the Audit Committee and external auditors, that operations, financial statements and reporting comply with Wilton Re policy, as well as generally accepted accounting practices. The internal audit program addresses key business and operational risks across the entire organization, including WREB, and the group's business partnerships. An annual risk assessment process is performed and documented as part of the development of each year's Audit Plan.

**f. Actuarial Function**

The Company CEO is a qualified actuary who oversees the main actuarial functions of the Company, with the exception of the Approved Actuary role. This role is outsourced to an internationally recognized actuarial consulting firm. The actuarial function is supported by an in-house actuarial staff of three actuarial analysts, plus affiliate and third-party actuarial service providers as needed. The Company ensures the fitness and propriety of any individuals performing the actuarial function.

**g. Outsourcing**

The Company relies on services performed by an affiliated company, Wilton Re Services, Inc., to support several functions, including investment management, premium processing, claims administration, financial reporting, information technology, internal controls and other general administrative activities. Certain legal and IT services are outsourced externally within Bermuda. For functions outsourced either externally to third parties or internally to affiliated entities, the Company Board, CEO and CFO maintain oversight and accountability for all outsourced functions as if these functions were performed internally and subject to Company standards on governance and internal controls.

### 3. Risk Profile

The Company's pursuit of its business objectives in conjunction with its risk appetite produces certain key risk exposures. When assessing the Company's risk exposures, i.e. its risk profile, Wilton Re considers its business as a whole, and at an entity level. The material risks identified by Wilton Re are listed in the Wilton Re Risk Register. Each risk is assigned a risk owner, who is responsible for assessing the likelihood and impact scores for the risks based on a scale defined within the ERM Policy. Risk owners must also maintain a Risk Monitoring Inventory, which lists all of the periodic monitoring activities undertaken to monitor the likelihood and/or impact of each risk within the Risk Register. A log of Emerging Issues is also recorded in the Risk Register. The Emerging Issues Log serves as a risk radar for the Company to monitor trends and events in the environment that could impact the achievement of our objectives. Risk owners are required to review the Risk Register, the Risk Monitoring Inventory and the Emerging Issues Log for completeness and accuracy each quarter, and they must suggest additions, modifications or deletions when necessary. Each risk owner considers a list of targeted trigger questions when conducting their quarterly reviews.

Descriptions of the Company's key exposures and mitigating measures are provided below:

#### a. Insurance Underwriting Risk

The underwriting of insurance risks is a material risk to Wilton Re and to the Company. The primary risks in this category are mortality, longevity, morbidity and persistency risks. Wilton Re's expertise lies in the careful underwriting of these risks using robust models and well-vetted assumptions.

Wilton Re has processes, procedures and controls in place to mitigate its insurance risks. These include standardized pricing documentation, rigorous peer review, a robust due diligence process, a highly specialized and experienced team, a Risk Committee and Board review process, and a thorough treaty review with inclusion of protections to limit risks. Pricing assumptions are tested and validated through an annual embedded value review (both internal and external) and by embedded value sensitivity testing.

Catastrophic mortality risk (i.e. pandemic risk) is also covered within this risk category. This risk is mitigated by inuring reinsurance coverage and is monitored carefully. Even with mitigation, management understands and accepts that Wilton Re retains a material exposure to a severe pandemic.

#### b. Investment, Liquidity and Concentration Risk

The investment and liquidity of assets held to pay claims to policyholders is a material risk to Wilton Re and to the Company. Wilton Re's investment risk exposure is mitigated by its conservative investment strategy, adherence to investment policy limits, and rigorous monitoring activities. Wilton Re's investment portfolio consists primarily of bonds, policy loans, short-term securities and cash, with over 90% of all bond holdings at investment grade. Impairments have been modest in recent years. Investment risks, including concentration risk, are mitigated and controlled by compliance with the Wilton Re Investment Guidelines.

The Wilton Re Investment Guidelines were developed based on a "prudent person" principle, where Wilton Re only assumes investment risks that it can properly identify, measure, respond to, monitor, control, and report, while taking into consideration its capital requirements and



adequacy, short-term and long-term liquidity requirements and policyholder obligations. Investment decisions are executed in the best interest of Wilton Re's policyholders.

Wilton Re maintains an appropriate level of liquidity in line with its risk profile. This degree of liquidity allows for unexpected cash needs to be met without forcing the potentially untimely sale of investments. Liquidity ratios are monitored and maintained well within acceptable limits.

**c. Market Risk**

Wilton Re is materially exposed to interest rate risk in two ways. First, sustained low interest rates exposes Wilton Re to spread compression risk on future reinvested assets. Second, interest-sensitive liabilities expose Wilton Re to rising interest rates and the related disintermediation risk.

In general, interest rate risks are monitored and managed under Wilton Re's Asset-Liability Management Policy. Other control activities include active involvement in credited rate determination of underlying reinsured policies, crediting rate strategy, and careful monitoring of lapse rates.

Exposure to equity risk from equity-linked products is fully hedged, and equity investments are limited by investment guidelines.

**d. Credit Risk**

Wilton Re is materially exposed to credit risk in two ways. First, Wilton Re is exposed to investment credit risk, which is addressed above in 3b. *Investment, Liquidity and Concentration Risk*. Second, Wilton Re is exposed to counterparty credit risk to its reinsurers and retrocessionaires, both directly and through inuring reinsurance on acquired blocks of business. This exposure is mitigated through diversification of reinsurance counterparties, careful due diligence and ongoing annual reviews of counterparty creditworthiness, and compliance with relevant controls.

**e. Operational Risk**

Various aspects of operational risks are considered material risks to Wilton Re and to the Company. Most operational risks, such as cybersecurity, fraud, business processing, outsourcing, and IT, are mitigated by our internal control system. These controls are tested regularly for compliance. The outsourcing of administrative processes is fundamental to Wilton Re's business model, and strong oversight is maintained over these processes through monthly reporting and monitoring of service level agreements and business operating guidelines.

The Board is satisfied that the operational controls in place with such service providers are adequate to mitigate the operational risks inherent in Wilton Re's business.

**f. Group Risk**

Each affiliate within the Wilton Re group is strongly capitalized, and the group is owned by a well-established AAA-rated parent. The Company is exposed to operational risks inherent in the services outsourced to affiliated companies. Refer to Operational Risk above for further details.

**g. Strategic Risk**

Strategic risk could impact Wilton Re's ability to establish and execute a sound business strategy. Wilton Re and the Company are exposed to strategic risk when considering a transaction involving new products or markets. This risk is mitigated by a business case process which addresses business potential, expected returns, counterparty, distribution methods, required investment, and impact to Wilton Re's processes and risks. Any changes in business strategy must be reviewed and approved by the Wilton Re Risk Committee, and the WRL Board and, where relevant, the WREB Board.

**h. Reputational Risk**

Reputational risk could occur due to actions by Wilton Re, including the Company or its employees, that damage Wilton Re's reputation, including any actual or perceived infraction. Reputational damage could prohibit new sales or lead to termination of existing contracts. To mitigate this risk, Wilton Re maintains transparency in working with its clients. Wilton Re also maintains strict hiring standards and a Code of Business Conduct and Ethics process. As part of the Code of Business Conduct and Ethics process, employees are reminded annually that integrity is the fundamental value at Wilton Re, and that Wilton Re's reputation and continued success is dependent upon the conduct of its associates. Each associate must annually reaffirm to adhere to the principles of the Code and its spirit of ethical conduct.

**i. Legal / Litigation Risk**

The Company currently has no pending or threatened material litigation. Wilton Re's compliance risk is mitigated by its internal control system. Wilton Re has processes and procedures in place to ensure monitoring of relevant rules and regulations. Wilton Re actively participates in several industry groups and committees to stay informed of proposed changes to rules and regulations, as well as to advocate for Wilton Re.

Litigation risk is mitigated by Wilton Re's experienced legal and compliance staff, supplemented with regular use of outside counsel. Legal associates are generally involved in all aspects of the Company's operations, and management is trained to seek legal department guidance on contract and other general and strategic operational matters.

**j. Stress Testing and Sensitivity Analysis**

Each year Wilton Re determines a series of stress tests specific to the group's risk profile. The stress testing is performed using an Embedded Value model. Sensitivities of Wilton Re's most material risk drivers are analyzed by testing the impact of driver movements on the group's Embedded Value. The results show that Wilton Re's main risk exposures are to severe market disruptions impacting asset defaults, interest rates and equity returns, and to adverse underwriting experience impacting mortality, longevity, lapse, and morbidity.

## 4. Solvency Valuation

The Company's solvency basis is the Bermuda Economic Balance Sheet ("EBS"), where all assets and liability values are calculated in accordance to the Bermuda EBS rules and regulations.

### a. Assets

All assets are held at fair market value.

### b. Technical Provisions

Technical provisions were derived using the Scenario Method described in the statutory accounting rules. The Company's technical provisions as of December 31, 2020 were as follows (in \$millions):

Best Estimate Liability	17,992.4
Risk Margin	<u>440.2</u>
Technical Provisions	18,432.6

### c. Reinsurance Recoverables

The Company had no material reinsurance recoverables at year-end 2020.

### d. Other Liabilities

The valuation basis used to derive the value of the deferred tax asset is US GAAP, with an adjustment to account for temporary differences in the economic balance sheet balances. The valuation basis used to derive the value of other liabilities is US GAAP.

## 5. Capital Management

### a. Eligible Capital

The Company assesses its capital adequacy in relation to its risk profile on a quarterly basis, and this capital assessment is well-integrated with the Company's strategic and capital management activities. As a planning tool, internal target risk capital is established for each Wilton Re operating company as the level of capital needed to achieve its business objectives, with consideration of the current risk profile and risk appetite. Generally, the internal Target Capital measure starts with regulatory capital requirements with an additional level of conservatism if deemed appropriate for its risk profile. The ORSA process validates the Company's Target Capital as appropriate given the Company's risk exposures. The Company examines rating agency capital and other regulatory measures to assess solvency and for comparison purposes. The Company calculates required capital amounts under NAIC RBC, AM Best BCAR and BSCR capital. The available capital is compared to these measures on a quarterly basis to monitor solvency and rating agency requirements. The goal of this analysis is to determine the Company's risk capital needs and to compare that risk capital to available capital to assess capital adequacy. The capital levels are analyzed with consideration of current business opportunities and risk profile, to inform management's decision-making regarding capital infusions or reductions. Liquidity needs vs. available liquidity, and potential capital and liquidity sources are also considered. This analysis is presented to WRL management and the WRL Board (which include the WREB Board members) each quarter.

Development of the Eligible Capital amount is shown below (in \$ millions):

Fully paid common Shares plus Contributed surplus	798.4
Statutory economic surplus from Economic Balance Sheet	953.0
Less: Encumbered assets not securing policyholder obligations	(27.3)
Less: Excess encumbered assets transferred to Tier 2	(27.3)
Add: Capital adjustments approved by BMA	<u>116.4</u>
<b>Total Tier 1 Eligible Capital</b>	<b>1,813.1</b>
<b>Total Tier 2 Eligible Capital</b>	<b><u>27.3</u></b>
<b>Total Eligible Capital</b>	<b>1,840.4</b>

### b. Regulatory Capital Requirements

The Company is in compliance with the MSM and ECR requirements as of December 31, 2020. The implementation of the revised BSCR rules became effective in 2019. The impact of the new rules will transition in over a period of 10 years in a straight-line manner, with one-tenth of the change becoming effective for 2019, two-tenths effective in 2020. The ECR below reflects the transitional amount. The amount of eligible capital exceeds all the minimum requirements shown below (in \$ millions):

Minimum Margin of Solvency (MSM)	313.3
Enhanced Capital Requirement (ECR)	617.6
Regulatory Target Capital (120% ECR)	741.1

The regulatory requirement states that at least 80% of the MSM requirement and 50% of the ECR requirement must be met with Tier 1 Eligible Capital, and no more than 25% of the MSM

requirement or 50% of the ECR requirement can be met with Tier 2 Eligible Capital. The Company's eligible capital amounts meet these requirements.

**c. Approved Internal Models**

No internal models were used to derive the ECR.


**6. Subsequent Events**

There are no material subsequent events to report from the end of the reporting period through April 30, 2021, representing the date which this Report was filed.

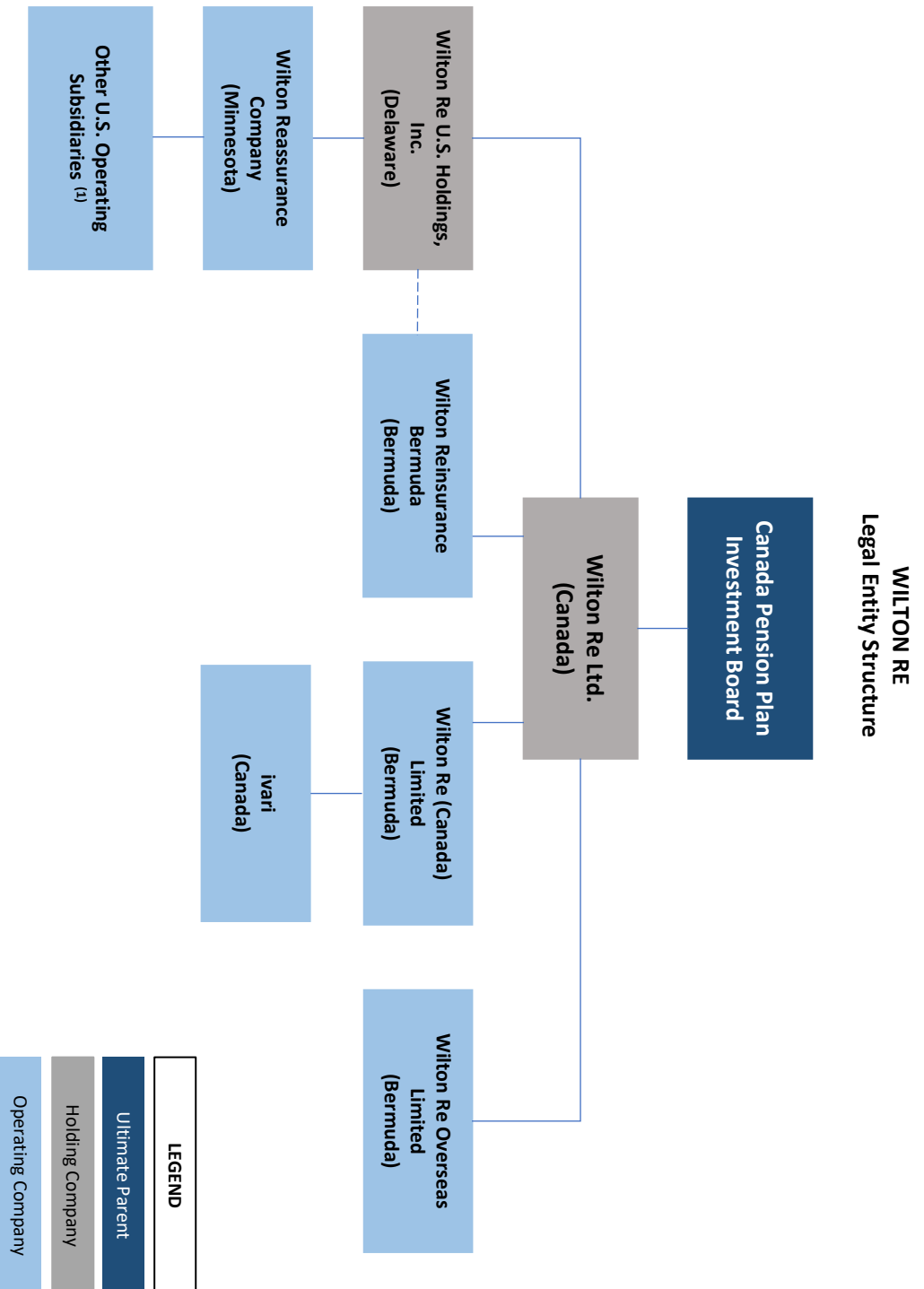
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## 7. Declarations on Financial Condition Report

We have responsibility for the actuarial, risk management, internal audit and compliance functions of the Company. We declare that, to the best of our knowledge and belief, this financial condition report fairly represents the financial condition of the insurer in all material respects.

By:   
Name: Sylvia Oliveira  
Title: Chief Executive Officer and Chief Risk Officer

By:   
Name: Brendan Kemp  
Title: Chief Financial Officer and Internal Audit Officer



<sup>(1)</sup> Includes, among others, Texas Life Insurance Company (TX), Wilton Reinsurance Life Company of New York (NY) and Wilcac Life Insurance Company (IL).

# WILTON REINSURANCE BERMUDA LIMITED

## Governance Structure

