

# Insurer Climate Risk Disclosure Survey

August 24, 2023

The responses included herein are submitted on behalf of the **Berkshire Hathaway group of insurance companies** and intended to address the Insurer Climate Risk Disclosure Survey. This response is submitted on behalf of all insurance companies within **NAIC Group Code 0031**.

## **Part I: Governance** - *Disclose the insurer's governance around climate-related risks and opportunities.*

In disclosing the insurer's governance around climate-related risks and opportunities insurers should consider including the following:

- Identify and include any publicly stated goals on climate-related risks and opportunities.
- Describe where climate-related disclosure is handled within the insurer's structure, e.g., at a group level, entity level, or a combination. If handled at the group level, describe what activities are undertaken at the company level.

A. Describe the board and/or committee responsible for the oversight of climate-related risks and opportunities.

In describing the position on the board and/or committee responsible for the oversight of managing the climate-related financial risks, insurers should consider including the following:

- Describe the position on the board and/or committee responsible for the oversight of managing the climate-related financial risks.

B. Describe management's role in assessing and managing climate-related risks and opportunities.

### *C. Close Ended Questions*

1. Does the insurer have publicly stated goals on climate-related risks and opportunities? **No**
2. Does your board have a member, members, a committee, or committees responsible for the oversight of managing the climate-related financial risk? **Yes**
3. Does management have a role in assessing climate-related risks and opportunities? **Yes**
4. Does management have a role in managing climate-related risks and opportunities? **Yes**

Berkshire Hathaway Inc. ("Berkshire") is a holding company owning subsidiaries engaged in a number of diverse business activities. These activities include insurance business conducted on both a direct and reinsurance basis. Berkshire is domiciled in the state of Delaware and headquartered in Omaha, Nebraska.

The Berkshire Audit Committee Charter includes the duty and responsibility "to discuss guidelines and policies governing the process by which senior management of the Company and the relevant departments of the Company assess and manage the Company's exposure to risk, including environmental and social risks such as climate change and diversity, respectively, and to discuss the Company's major financial risk exposures and the steps management has taken to monitor and control such exposures." The Audit Committee Charter is available on Berkshire's website at

**<https://berkshirehathaway.com/govern/audit.pdf>**.

Berkshire's insurance and reinsurance business activities are conducted through numerous domestic and foreign-based insurance subsidiaries. Berkshire's insurance subsidiaries provide insurance and reinsurance of property and casualty risks and reinsurance of life and health risks worldwide. Berkshire's insurance companies maintain capital strength at exceptionally high levels, which differentiates them from their competitors. Collectively, the combined statutory surplus of Berkshire's U.S.-based insurers was approximately \$272 billion as of December 31, 2022, and these insurers maintained an aggregate GAAP equity of \$297 billion. All of Berkshire's major insurance subsidiaries are rated AA+ by Standard & Poor's and A++ (superior) by A.M. Best with respect to their financial condition and operating performance.

Berkshire's insurance underwriting operations include the following sub-groups: (1) GEICO and its subsidiaries, (2) Berkshire Hathaway Reinsurance Group, (3) Berkshire Hathaway Primary Group, and (4) Alleghany Corporation and its subsidiaries. For the purpose of this document, these four sub-groups make up the Berkshire Hathaway group of insurance companies ("Group").

The Group designated a Chief Compliance Officer ("CCO") and Deputy Chief Risk Officer ("DCRO") for the Group. The Group CCO and DCRO coordinate climate-related disclosures through collaboration with Company representatives. Collaboration occurs through Group sponsored workshops and Enterprise Risk Management ("ERM") Committee Meetings. The ERM Committees include representatives from the significant operations.

The ERM Committees assist the Group's Boards and Risk Officers in fulfilling their climate-related risk oversight responsibilities regarding risk appetite, risk management, and governance. The consideration of climate-related risk is deeply embedded in the Group's ERM framework and addressed by each of the insurance sub-groups. Climate-related risk considerations are actively considered within a number of the key risks in the enterprise risk inventory. This includes underwriting, reputational, and investment risk categories.

Climate-related risk is also a stand-alone risk in the Group's key risk inventory. The risk is assigned to the Group CCO and DCRO to own and continuously monitor. This includes assessing the Group's potential exposure to climate-related risk and the effectiveness of the controls designed to mitigate such risk. Additionally, the Group has instituted climate-related risk specific stress testing (the Group's approach to stress testing will be addressed throughout this disclosure). The ERM Committees communicate potential areas of improvement to the appropriate sub-group executives as needed. Board escalation would also be considered based on the severity of the potential exposure to the impacted entity.

The Group's risk decisions are solely dictated by an expectation of an economic profit within the aggregate risk tolerance limits regardless of marketplace acceptance of those risk decisions. The decisions include consideration of climate-related risk.

Currently, the Group does not have any publicly stated goals with regard to climate-related risks and opportunities, however, multiple entities within the Group adopted the following Sustainability Statement (or similar):

*We are committed to adopting environmentally sustainable business practices to help protect and preserve the environment and the availability of its natural resources for future generations. It is our intent to rationally implement energy efficient technologies, conserve limited natural resources, and provide tools and information to encourage sustainability.*

In addition, representatives of the Group's insurance operations participate in Berkshire's annual sustainability summit and quarterly meetings of Berkshire companies to discuss best practices in sustainability.

The Group's insurance operations do not directly generate significant carbon emissions. While some of Berkshire Hathaway's non-insurance businesses generate higher levels of carbon emissions, they have also developed publicly stated emission-related goals. This includes significant entities Berkshire Hathaway Energy ("BHE") and Burlington Northern Santa Fe ("BNSF"). Each operation has long been engaged in delivering sustainable outcomes that benefit all constituencies including customers, communities, state and federal governments, and Berkshire's shareholders.

BHE has invested heavily in owned wind, solar, and geothermal generation with cumulative investments of \$31.6 billion through 2022 and has retired 16 coal generating units. As a result, BHE has reduced its annual greenhouse gas ("GHG") emissions by more than 27% from 2005 levels. BHE plans to continue investing in wind, solar, and other low- and non-carbon generation in the future and to retire an additional 16 coal generation units between 2023 and 2030 in a reliable and cost-effective manner, thereby achieving a 50% reduction in GHG emissions from 2005 levels in 2030. BHE has also committed to

support emissions reductions consistent with the Paris Agreement and is well on track to retire all of its coal-fueled units before 2050. BHE has developed a Green Financing Framework that aligns with the Green Bond Principles published by the International Capital Markets Association and the Loan Market Association Green Loan Principles, under which BHE may issue bonds, loans, commercial paper or other financial instruments to finance or refinance eligible projects related to renewable energy, clean transportation, climate change adaptation and energy efficiency with intended environmental benefits under BHE's Green Financing Framework. Further details regarding the Green Financing Framework are available on BHE's website at

**<https://www.brkenenergy.com/esg-sustainability/green-financing>**.

BNSF, one of the largest railroads in the US, is taking active steps to manage and reduce its air emissions to help mitigate BNSF's environmental impact in the communities in which it operates. BNSF management has committed to a broad sustainability model, applying science-based approaches, that will provide a 30% reduction in BNSF's GHG emissions by 2030 from its baseline year of 2018. BNSF intends to continue improvements in fuel efficiency and increased utilization of renewable diesel fuel. Long-term solutions, such as battery-electric and hydrogen locomotives, are also being evaluated and field-tested. Further details regarding BNSF's sustainability efforts are available on their website at

**<https://www.bnsf.com/in-the-community/environment/sustainability-overview-2023/>**.

**Part II: Strategy** - *Disclose the actual (and potential impacts of climate-related risks and opportunities on the insurer's businesses, strategy, and financial planning where such information is material.*

In disclosing the actual and potential impacts of climate-related risks and opportunities on the insurer's businesses, strategy and financial planning, insurers should consider including the following:

- Describe the steps the insurer has taken to engage key constituencies on the topic of climate risk and resiliency.
- Describe the insurer's plan to assess, reduce, or mitigate its greenhouse gas emissions in its operations or organizations.

A. Describe the climate-related risks and opportunities the insurer has identified over the short, medium, and long term.

In describing the climate-related risks and opportunities the insurer has identified over the short, medium, and longer term, insurers should consider including the following:

- Define short, medium, and long-term, if different than 1-5 years as short term, 5-10 years as medium term, and 10-30 years as long term.

B. Describe the impact of climate-related risks and opportunities on the insurer's business, strategy, and financial planning.

In describing the impact of climate-related risks and opportunities on the insurer's business, strategy, and financial planning, insurers should consider including the following:

- Discuss if and how the insurer provides products or services to support the transition to a low carbon economy or helps customers adapt to climate-related risk.
- Discuss if and how the insurer makes investments to support the transition to a low carbon economy.

C. Describe the resilience of the insurer's strategy, taking into consideration different climate-related scenarios, including a 2 degree Celsius or lower scenario.

*E. Close Ended Questions*

1. Has the insurer taken steps to engage key constituencies on the topic of climate risk and resiliency? **Yes**
2. Does the insurer provide products or services to support the transition to a low carbon economy or help customers adapt to climate risk? **Yes**
3. Does the insurer make investments to support the transition to a low carbon economy? **Yes**
4. Does the insurer have a plan to assess, reduce or mitigate its greenhouse gas emissions in its operations or organizations? **Yes**

The structure of the Group provides opportunities for the various business units to consider individual initiatives to assess, reduce, and mitigate GHG emissions in their operations as part of the strategic planning process and share those initiatives as best practices. This informal process typically estimates the rate of return on investments in carbon-reduction technologies and the overall benefit to the environment. Ongoing GHG and other related environmental conservation initiatives within the Group's daily operations include the following:

- Analyzing the potential for electricity and natural gas usage savings in both new and existing office space and data centers;
- Implementing technology, equipment, and processes to reduce electricity and natural gas usage, such as transitioning from fluorescent to LED lighting, and installing motion sensor lighting, high efficiency window blinds, and computer controlled thermostats;
- Updating computer equipment to take advantage of cutting-edge technology, often reducing energy usage as well as adding more computing power while using less equipment;

- Considering the benefits of increased work location flexibility and virtual meetings. This includes assessing the carbon footprint impacts associated with office space, commuting and associated travel;
- Advocating the recycling of paper, glass, and plastics to all personnel and providing options to make recycling convenient at office locations;
- Encouraging electronic communication versus paper usage;
- Supporting the use of reusable cups to reduce one time use products, including providing personnel with washable/reusable mugs and water bottles;
- Promoting the use of technology to the customer base to reduce the amount of paper distributed; and
- Employing imaging technology to replace paper usage and long-term information storage.

The Group's primary exposure to climate risk arises from its Property and Casualty ("P&C") insurance and reinsurance business. P&C insurance policies and reinsurance agreements are customarily written for one-year terms and repriced annually to reflect changing exposures (increased possibilities of loss translate promptly into increased premiums). The Group closely monitors and evaluates the potential frequency and severity of natural catastrophe risks, including those that could be potentially influenced by climate risk.

Climate change will likely have different implications for the different lines of insurance that are underwritten in the Group, including personal lines, commercial liability lines, commercial property lines, and reinsurance. Each insurance business within the Group is focused on the implications for its particular underwriting specialties and modifies its underwriting approach based on a variety of actuarial and underwriting techniques that consider the potential frequency and severity of natural catastrophes. The leaders of each insurance business regularly monitor potential shifts in customer demand for products, as well as market developments that affect pricing decisions.

Where appropriate, the Group's underwriting process includes a review of potential exposures to natural catastrophe risk and the risk mitigation measures taken by policyholders in response to potential climate change-influenced events. An underwriter's consideration of these climate risk mitigation actions can lead to a rate reduction.

The Group continuously monitors the impact climate-related risk could have on its various lines of business and assesses the potential impact on pricing as well as underwriting and risk selection. As a result of this monitoring and assessment process, it is possible that policy terms and conditions could be updated or revised to reflect changes in such risk. Likewise, opportunities to create new lines may be identified as a result of these reviews.

As noted above, the Group's risk decisions are dictated by an expectation of an economic profit within the aggregate risk tolerance limits regardless of marketplace acceptance of those risk decisions. The Group has demonstrated willingness to assume multiples of its current levels of risks if the opportunities exist. Likewise, the Group has shown an equal demonstrated willingness to assume only a fraction of the current risks if market conditions do not allow the risk assessments to prevail.

Robust catastrophe modeling provides insight into climate-related risk. For the traditional reinsurance segment, the various insurance operations within the Group take a hybrid approach that reflects both modeled and limits-based exposures when aggregating catastrophe accumulations for severe weather events that may have a linkage to or be exacerbated by climate change. The remaining Group risks are modeled using a range of catastrophe models (RMS, AIR, etc.). The Group incorporates these exposures by including each business unit's 250-, 500-, and 1,000-year exposure by catastrophe zone and event in the overall analysis. The Group then confirms that the net risk associated with one catastrophic event does not exceed 15-20% of each legal entity's surplus. This risk tolerance level ensures that each underlying legal entity is more than capable of meeting policyholder obligations.

The Group also performs various climate risk focused stress testing as part of its ORSA process. The ORSA climate-related risk focused stress testing accounts for the following impacts:

- **Natural Catastrophe Risk** – The Group is exposed to physical risks of climate change, including a potential increase in severe weather-related events. The stresses include multiple 500-year events. The ERM Committees believe this approach is more meaningful/conservative than focusing only on thermal stress testing.
- **Transition Risk** – The Group could face Transition Risk if companies in the investment portfolio face sudden drops in asset values or increased credit risk as a result of the transition to a lower carbon economy.
- **Litigation Risk** – The Group could be exposed to Litigation Risk if parties who have suffered losses and damages from climate change seek to recover from insureds whom they believe are responsible.
- **Pricing Risk** – The Group protects itself against Pricing Risk in its P&C insurance policies in the coverage term, which is customarily written for one year and repriced annually to reflect changing exposures (increased possibilities of loss translate promptly into increased premiums). This reduces the climate change driven residual pricing risk significantly. As a result, a pricing risk stress is not warranted at this time.
- **Underwriting Risk** – Certain climate change mitigation efforts are expected to decrease the demand for insurance for industries that produce non-renewable resources (i.e., coal, natural gas, and oil). Other mitigation efforts are likely to reduce the population of insureds for certain business units (i.e., auto and airline) leading to a decreased pool of insureds and associated premium.

**Part III: Risk Management-** *Disclose how the insurer identifies, assesses, and manages climate-related risks.*

In disclosing how the insurer identifies, assesses, and manages climate-related risks, insurers should consider including the following:

- Describe how the insurer considers the impact of climate-related risks on its underwriting portfolio, and how the company is managing its underwriting exposure with respect to physical, transition and liability risk.
- Describe any steps the insurer has taken to encourage policyholders to manage their potential physical and transition climate-related risks, if applicable.
- Describe how the insurer has considered the impact of climate-related risks on its investment portfolio, including what investment classes have been considered.

A. Describe the insurers' processes for identifying and assessing climate-related risks.

In describing the insurers' processes for identifying and assessing climate-related risks, insurers should consider including the following:

- Discuss whether the process includes an assessment of financial implications and how frequently the process is completed.

B. Describe the insurer's processes for managing climate-related risks.

C. Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the insurer's overall risk management.

In describing how processes for identifying, assessing, and managing climate-related risks are integrated into the insurer's overall risk management, insurers should consider including the following:

- Discuss whether climate-related risks are addressed through the insurer's general enterprise-risk management process or a separate process and how frequently the process is completed.
- Discuss the climate scenarios utilized by the insurer to analyze its underwriting risks, including which risk factors the scenarios consider, what types of scenarios are used, and what timeframes are considered.
- Discuss the climate scenarios utilized by the insurer to analyze risks on its investments, including which risk factors are utilized, what types of scenarios are used, and what timeframes are considered.

*D. Close Ended Questions*

1. Does the insurer have a process for identifying climate-related risks? **Yes**
2. If yes, are climate-related risks addressed through the insurer's general enterprise-risk management process? **Yes**
3. Does the insurer have a process for assessing climate-related risks? **Yes**
4. If yes, does the process include an assessment of financial implications? **Yes**
5. Does the insurer have a process for managing climate-related risks? **Yes**
6. Has the insurer considered the impact of climate-related risks on its underwriting portfolio? **Yes**
7. Has the insurer taken steps to encourage policyholders to manage their potential climate-related risks? **Yes**
8. Has the insurer considered the impact of climate-related risks on its investment portfolio? **Yes**
9. Has the insurer utilized climate scenarios to analyze their underwriting risk? **Yes**
10. Has the insurer utilized climate scenarios to analyze their investment risk? **Yes**

As referenced herein, consideration of climate-related risk is deeply embedded in the Group's ERM framework and addressed by each of the insurance sub-groups.

The Group's annual stress testing exercise considers the potential climate-related risk posed to the Group's diverse underwriting portfolio. This includes consideration of physical, transition, and liability risk.

Various insurance business units/operations within the Group have taken measures to encourage policyholders to mitigate the impact of climate change in their operations. Where appropriate, a business unit's underwriting process may include a review of potential exposures to natural catastrophe risk and the risk mitigation measures taken by policyholders in response to potential climate change-influenced events. The consideration of these climate risk mitigation actions can lead to a rate reduction for the policyholder.

Berkshire's corporate office senior management participates in and is ultimately responsible for the significant capital allocation decisions and investment activities of the Group. The investment decisions made by Berkshire's investment managers prioritize the assured solvency of Berkshire's insurance companies for the protection of our policyholders. The Group's investment portfolio has also experienced superior long-term performance in comparison to its peers. There are various mechanisms of control in place to ensure the Group has the liquid assets to meet cash needs under current conditions or possible future environments. As noted above, these controls include stress test modeling that considers how certain key solvency-related financial statement entries of the insurance companies are affected by modifications in key asset valuations (stocks and bonds). This includes Transition Risk. As part of the Transition Risk Assessment, the investment portfolios for the insurance companies are assessed to identify holdings that are susceptible to sudden drops in asset values or increased credit risk as a result of a significant shift or acceleration of the transition to a lower carbon economy or reduced demand for certain types of products and services.

The Group considers developing legal and regulatory changes that may adversely impact its future operating results. Over time, in response to financial market crises, global economic recessions, and social and environmental issues, regulatory initiatives have been adopted in the United States and elsewhere that may impact operating results. These initiatives impact all businesses, albeit in varying ways. Increased regulatory compliance constraints could have a significant negative impact on Berkshire's operating businesses as well as on the businesses in which Berkshire maintains a significant, but not controlling, economic interest.



**Part IV: Metrics and Targets** - *Disclose the metrics and targets used to assess and manage relevant collateralized risks and opportunities where such information is material.*

In disclosing the metrics and targets used to assess and manage relevant collateralized risks and opportunities where such information is material, insurers should consider including the following:

Discuss how the insurer uses catastrophe modeling to manage the climate-related risks to your business. Please specify for which climate-related risks the insurer uses catastrophe models to assess, if any.

A. Disclose the metrics used by the insurer to assess climate-related risks and opportunities in line with its strategy and risk management process.

In disclosing the metrics used by the insurer to assess climate-related risks and opportunities in line with its strategy and risk management process, insurers should consider including the following:

- In describing the metrics used by the insurer to assess and monitor climate risks, consider the amount of exposure to business lines, sectors, and geographies vulnerable to climate-related physical risks [answer in absolute amounts and percentages if possible], alignment with climate scenarios, [1 in 100 years probable maximum loss, Climate VaR, carbon intensity], and the amount of financed or underwritten carbon emissions)

B. Disclose Scope 1, Scope 2, and if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.

C. Describe the targets used by the insurer to manage climate-related risks and opportunities and performance against targets.

*D. Close Ended Questions*

1. Does the insurer use catastrophe modeling to manage your climate-related risks? **Yes**
2. Does the insurer use metrics to assess and monitor climate-related risks? **Yes**
3. Does the insurer have targets to manage climate-related risks and opportunities? **No**
4. Does the insurer have targets to manage climate-related performance? **No**

The Group does not use a one-size-fits-all probabilistic economic capital model to manage its risks and deploy its capital. The Group maintains a significantly higher level of capitalization than any other insurance group in the United States and relies on the significant expertise of its experienced managers, clear risk tolerance limits, and bespoke stress testing to manage its risks.

As highlighted above, the Group completes robust annual stress testing that accounts for the multiple risks posed by climate change. The post-stress results are examined against minimum risk-based capital ratios established by the Group's ERM Committees. The domestic insurers' post-stress benchmark is the "Authorized Control Level RBC." A ratio below 350% requires increased management monitoring and potential corrective action. Active P&C insurance companies subject to Solvency II requirements seek to maintain a post-stress Authorized Control Level RBC of at least 150%. A ratio below 150% Authorized Control Level RBC requires increased management monitoring and potential corrective action.

The Group has estimated its annual Scope 1 emissions to be approximately 39,000 metric tons of Carbon Dioxide (CO<sub>2</sub>) equivalent and Scope 2 emissions to be approximately 65,000 metric tons of Carbon Dioxide (CO<sub>2</sub>) equivalent. Scope 3 emissions are not currently tracked/analyzed.

As noted above, Berkshire's significant non-insurance entities have publicly disclosed GHG reduction targets. The Group has not developed separate formal climate-related targets.

**Appendix A – Berkshire Hathaway group of insurance companies**

Company	NAIC #	Domicile
National Indemnity Company	20087	NE
Columbia Insurance Company	27812	NE
National Fire & Marine Insurance Company	20079	NE
National Liability & Fire Insurance Company	20052	CT
National Indemnity Company of Mid-America	20060	IA
National Indemnity Company of the South	42137	IA
Finial Reinsurance Company	39136	CT
Wellfleet New York Insurance Company	20931	NY
Wellfleet Insurance Company	32280	IN
Berkshire Hathaway Assurance Corporation	13070	NY
Berkshire Hathaway Life Insurance Company of Nebraska	62345	NE
Berkshire Hathaway Specialty Insurance Company	22276	NE
First Berkshire Hathaway Life Insurance Company	11591	NY
BHG Life Insurance Company	14939	NE
British Insurance Company of Cayman	NA	CYM
Berkshire Hathaway Direct Insurance Company	10391	NE
Berkshire Hathaway International Insurance Ltd.	NA	GBR
Berkshire Hathaway European Insurance Designated Activity Company	NA	IRL
Tenecom Ltd.	NA	GBR
Transfercom Ltd.	NA	GBR
BA (GI) Ltd.	NA	GBR
Kyoei Fire & Marine Insurance Co. (UK) Ltd.	NA	GBR
NRG Victory Reinsurance Ltd.	NA	GBR
The Scottish Lion Insurance Company Ltd.	NA	GBR
The Medical Protective Company	11843	IN
Princeton Insurance Company	42226	NJ
MedPro RRG Risk Retention Group	13589	DC
AttPro RRG Reciprocal Risk Retention Group	13795	DC
PLICO, Inc.	39594	OK
United States Liability Insurance Company	25895	NE
Mount Vernon Fire Insurance Company	26522	NE
U.S. Underwriters Insurance Company	35416	ND
Mount Vernon Specialty Insurance Company	14420	NE
Radnor Specialty Insurance Company	15756	NE
Berkshire Hathaway Homestate Insurance Company	20044	NE
BHHC Special Risks Insurance Company	11014	IA
Continental Divide Insurance Company	35939	CO
Cypress Insurance Company	10855	CA
Oak River Insurance Company	34630	NE
Redwood Fire and Casualty Insurance Company	11673	NE

Company	NAIC #	Domicile
Vanderbilt Property & Casualty Insurance Company, Ltd.	NA	BVI
WestGUARD Insurance Company	11981	PA
AmGUARD Insurance Company	42390	PA
NorGUARD Insurance Company	31470	PA
EastGUARD Insurance Company	14702	PA
AZGUARD Insurance Company	16495	NE
Hawthorn Life Designated Activity Company	NA	IRL
Central States Indemnity Co. of Omaha	34274	NE
CSI Life Insurance Company	82880	NE
Government Employees Insurance Company	22063	NE
GEICO General Insurance Company	35882	NE
GEICO Indemnity Company	22055	NE
GEICO Casualty Company	41491	NE
GEICO Marine Insurance Company	37923	NE
GEICO Advantage Insurance Company	14138	NE
GEICO Choice Insurance Company	14139	NE
GEICO Secure Insurance Company	14137	NE
GEICO County Mutual Insurance Company	29181	TX
GEICO Texas County Mutual Insurance Company (f/k/a Southern County Mutual Insurance Company)	27863	TX
GEICO Protection Insurance Company	Pending	NE
Old United Casualty Company	37060	KS
Old United Life Insurance Company	76007	AZ
General Reinsurance Corporation	22039	DE
General Star Indemnity Company	37362	DE
General Star National Insurance Company	11967	DE
Genesis Insurance Company	38962	DE
General Reinsurance Australia Ltd	NA	AUS
General Re Compania de Reaseguros, S.A.	NA	URY
General Reinsurance AG	NA	DEU
General Reinsurance Africa Ltd.	NA	ZAF
General Reinsurance Life Australia Ltd.	NA	AUS
General Re Life Corporation	86258	CT
Idealife Insurance Company	97764	CT
Faraday Underwriting Ltd. (Syndicate 435)	NA	GBR
British Aviation Insurance Company Limited	NA	GBR
MLMIC Insurance Company	34231	NY
Capital Indemnity Corporation	10472	WI
Capital Specialty Insurance Corporation	10328	WI
Platte River Insurance Company	18619	NE
Covington Specialty Insurance Company	13027	NH
Landmark American Insurance Company	33138	NH

Company	NAIC #	Domicile
RSUI Indemnity Company	22314	NH
Fair American Insurance and Reinsurance Company	35157	NY
Fair American Select Insurance Company	15201	DE
Transatlantic Reinsurance Company	19453	NY
Alleghany Reinsurance Company, LLC	12640	VT
TransRe London Limited	NA	GBR
TReIMCo Limited	NA	GBR
Calpe Insurance Company Limited	NA	GBR
TranRe Europe SA	NA	LUX
TRC Escritorio de Representacao no Brasil Ltda	NA	BRA
Transatlantic Re (Argentina) S.A.	NA	ARG