

4 February 2021

# Joint Administrators' progress report for the period 11 June 2020 to 10 December 2020

Elite Insurance Company Limited (in Administration)

The Supreme Court of Gibraltar  
Case No. 2019/COMP/002



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Further information about the Administration can be found at [www.pwc.co.uk/elite-insurance](http://www.pwc.co.uk/elite-insurance)

# Abbreviations and definitions

The following table shows the abbreviations and insolvency terms that may be used in this report:

Abbreviation or definition	Meaning
<b>Administration</b>	The Administration of Elite Insurance Company Limited
<b>Armour</b>	Armour Risk Management Limited (as Elite's run-off agent)
<b>ATE</b>	After the event insurance product
<b>Cedents/Reinsurance Creditors</b>	Unsecured non-preferential creditors whose claims arise from being holders of policies of reinsurance issued by the Company
<b>Company/Elite</b>	Elite Insurance Company Limited (in Administration)
<b>Court</b>	The Supreme Court of Gibraltar
<b>Creditors</b>	Secured, Preferential creditor and Unsecured creditors as a whole
<b>DA ATE</b>	Delegated authority - after the event insurance product
<b>Direct Insurance Creditors</b>	Unsecured non-preferential creditors whose claims arise from being direct policyholders of the Company excluding Cedents
<b>DO</b>	A dommage ouvrage insurance policy taken out by French homeowners for building defects
<b>FCA</b>	Financial Conduct Authority
<b>FSICR</b>	Financial Services (Insurance Companies) Regulations 2020
<b>FSCS</b>	UK Financial Services Compensation Scheme
<b>GIA11</b>	Gibraltar Insolvency Act 2011
<b>GIR14</b>	Gibraltar Insolvency Rules 2014
<b>GFSC</b>	Gibraltar Financial Services Commission
<b>HMRC</b>	HM Revenue and Customs
<b>IPT</b>	Insurance Premium Tax
<b>Joint Administrators/we/us/our</b>	Edgar Lavarello of PricewaterhouseCoopers Limited Gibraltar and Dan Schwarzmann of PricewaterhouseCoopers LLP UK
<b>Preferential Creditors</b>	Creditors listed in section 2 of the Schedule GIR14, mainly relating to amounts due to employees or deducted from employee remuneration
<b>Period</b>	11 June 2020 to 10 December 2020
<b>Proposals</b>	The Administrators' proposals for the Administration of Elite dated 9 February 2020
<b>PwC</b>	PricewaterhouseCoopers Limited Gibraltar and/or PricewaterhouseCoopers LLP UK
<b>RB ATE</b>	Rate Based - After the event insurance product
<b>Secured Creditors</b>	Creditors with security in respect of their debt
<b>Unsecured Creditors</b>	Creditors who are neither Secured creditors or Preferential creditors (including creditors by virtue of any insurance contract)

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**Abbreviation or definition****Meaning**

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**VAT**UK Value Added Tax

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This report has been prepared by Edgar Lavarello and Dan Schwarzmann as Joint Administrators of the Company, solely to comply with their statutory duty to report to creditors under GIA11 and GIR14 on the Administration, and for no other purpose. It is not suitable to be relied upon by any other person, or for any other purpose, or in any other context.

This report has not been prepared in contemplation of it being used, and it is not suitable to be used, to inform any investment decision in relation to the debt of or any financial investment in the Company.

Any estimated outcomes for creditors included in this report are illustrative only and cannot be relied upon as guidance as to the actual outcome for creditors.

Some reference is made in this report to occasions on which the Joint Administrators have consulted legal advisers. However, the Joint Administrators do not intend to waive any privilege that they have, or Elite has in any legal advice.

Any persons choosing to rely on this report for any purpose or in any context other than under GIA11 and GIR14 do so at their own risk. To the fullest extent permitted by law, the Joint Administrators do not assume any liability in respect of this report to any such person.

Please note you should read this report in conjunction with the Joint Administrators' Proposals issued to the Company's creditors, which can be found at [www.pwc.co.uk/elite-insurance](http://www.pwc.co.uk/elite-insurance). Unless stated otherwise, all amounts in this report and appendices are stated net of VAT.

Edgar Lavarello of PricewaterhouseCoopers Limited Gibraltar and Dan Schwarzmann of PricewaterhouseCoopers LLP UK have been appointed as Joint Administrators by the Supreme Court in Gibraltar to manage the affairs, business and property of the Company. The Joint Administrators act as agents of the Company only and without personal liability. Edgar Lavarello is authorised to act as an insolvency practitioner by the GFSC in Gibraltar (IP Licence Number FSC 0892 FSA). Dan Schwarzmann is authorised to act as an insolvency practitioner by the Institute of Chartered Accountants in England and Wales in England (IP Licence number 8912). The Joint Administrators are bound by the Insolvency Code of Ethics which can be found at: <https://www.gov.uk/government/publications/insolvency-practitioner-code-of-ethics>

The Company is authorised and regulated by the GFSC. Registered office: c/o PricewaterhouseCoopers Limited, 327 Main St, GX11 1AA, Gibraltar. The Joint Administrators may act as controllers of personal data as defined by UK Data Protection Act 2018, the General Data Protection Regulation 2016/679 and any applicable Gibraltar or other data protection laws (as applicable), depending upon the specific processing activities undertaken. PwC may act as a data processor on the instructions of the Joint Administrators. Personal data will be kept secure and processed only for matters relating to the Joint Administrators' appointment. Further details are available in the privacy statement on the [www.pwc.co.uk](http://www.pwc.co.uk) website or by contacting the Joint Administrators.

PricewaterhouseCoopers Limited is a private limited company registered in Gibraltar with registered number 94799. The registered office of PricewaterhouseCoopers Limited is 327 Main Street, Gibraltar, GX11 1AA. PricewaterhouseCoopers Limited is authorised and regulated by the Gibraltar Financial Services Commission as an audit firm.

PricewaterhouseCoopers LLP is a limited liability partnership registered in England with registered number OC303525. The registered office of PricewaterhouseCoopers LLP is 1 Embankment Place, London WC2N 6RH. PricewaterhouseCoopers LLP is authorised and regulated by the Financial Conduct Authority for designated investment business.

# Key messages

## Why we have sent you this report

This is the second progress report by the Joint Administrators of the Company.

Creditors may wish to read this report in conjunction with our Proposals, which continue to be available on our website at <https://www.pwc.co.uk/services/business-restructuring/administrations/elite-insurance/proposals.html>. The information in that report is not repeated here unless considered necessary or beneficial for the purposes of this update.

Earlier progress reports can be viewed on our website at <https://www.pwc.co.uk/services/business-restructuring/administrations/elite-insurance/progress-reports.html>

This report provides an update on the work the Joint Administrators have undertaken, and the progress made since their appointment with particular focus on the progress made in the Period.

If you have any questions regarding your insurance policy, please use the following contact details:

UK and other: [Elite-insurance.uk@armourrisk.com](mailto:Elite-insurance.uk@armourrisk.com) or +44 (0)207 129 8147

France: [Elite-insurance.fr@armourrisk.com](mailto:Elite-insurance.fr@armourrisk.com) or +44 (0)207 129 8661

Italy: [Elite-insurance.it@armourrisk.com](mailto:Elite-insurance.it@armourrisk.com) or +44 (0)207 129 8663

Or write to: Elite Insurance Company Limited (in Administration), c/o Armour Risk Management Limited, 20 Old Broad Street, London, EC2N 1DP, United Kingdom.

## How much creditors may receive

This is a brief summary of the possible outcome for Creditors of the Company based on what we currently know. Elite is a complex case and it is relatively early in the Administration. Consequently, there are still a number of material uncertainties which may cause the current assumptions underpinning the estimates in this document to change. Please read the rest of this document and seek further specific advice where needed.

### Secured Creditors

We are not aware of any Secured Creditors. If you believe you are a Secured Creditor, please contact the Administrators immediately.

### Preferential Creditors

On the basis that Elite did not have any direct employees at the time of our appointment we do not expect any Preferential Creditors to arise in respect of former employees. If there are any Preferential Creditors, we would expect them to recover their claims in full.

### Unsecured Creditors

Direct Insurance Creditors rank ahead of all other Unsecured Creditors except Preferential Creditors by virtue of FSICR. Please note that any agreed damages claims relating to policies disclaimed by the Joint Administrators are classed as Direct Insurance Creditors.

The ultimate outcome for Unsecured Creditors will depend on a number of variable factors where considerable uncertainty currently exists. Our strategy for the Administration will seek to reduce this uncertainty but based on our current view of Elite's financial position, Direct Insurance Creditors are highly unlikely to receive 100 pence in the pound, unless appropriately covered by a relevant compensation scheme. As a consequence, other Unsecured Creditors should not expect a dividend. All creditors should seek to mitigate their losses as much as possible.

As the Administration develops, we will provide creditors with updates on future distribution prospects.

# Progress since our appointment and what is next

This section deals with the key activities we have undertaken since our appointment and what is next in the Administration.

## Elite's insurance products

Based on our initial review of the Company's available records, it appears that Elite has approximately 931,000 policyholders in the United Kingdom, France, Italy, Belgium, Germany, Greece, Jersey, Ireland, Luxembourg, Malta, Netherlands, Norway, Portugal, Romania and Spain. A very significant proportion of Elite's business was written via coverholders, meaning that in many cases, the Company's records do not include complete policyholder details. As a result, the accuracy of the data available to the Company is uncertain and is subject to ongoing validation checks through our interaction with Elite's coverholders, intermediaries and agents.

All policyholders should consider their position carefully and take appropriate advice before seeking to exercise any rights of cancellation that they might have.

## Compensation schemes

The latest status in respect of compensation eligibility for policyholders is summarised below:

### United Kingdom

The FSCS will meet Elite's liability to eligible claimants for protected claims in full, with no upper limit (subject to policy limits where they are applicable), for UK compulsory insurance in the instances of third party motor and employers' liability. The FSCS will also cover Elite's liability in respect of solicitors' professional indemnity claims at 100% with no upper limit (subject to policy limits where they are applicable).

For all other insurance, with certain exceptions, cover will be at 90% of Elite's liability to eligible claimants for protected claims. Where applicable, policyholders will have to bear the 10% not covered by the FSCS as well as any excess under the policy.

It is a condition of receiving compensation that FSCS takes an assignment of the policyholder's rights against Elite and any third party involved in or connected to their claim.

The FSCS is geared towards protecting policyholders who are private individuals, small businesses or partnerships. Generally, firms with an annual turnover of more than £1m will not be eligible; neither will policyholders who are themselves authorised financial services firms. However, for general contracts of insurance that are compulsory, usually all firms are eligible, regardless of size or authorisation status. Further details can be found on the FSCS website at [fscs.org.uk/what-we-cover/insurance](https://www.fscs.org.uk/what-we-cover/insurance). During the Period, the FSCS paid £2.98m in respect of 2,805 eligible claims.

### France

As previously indicated, there is no compensation protection available to Elite's French policyholders. As there is no compensation scheme available, French holders of DO policies are encouraged to consider taking their claims to the responsible contractor(s) or the contractors' insurers as this may enable them to achieve settlement of their claims far earlier and in full.

Please note that all French construction insurance policies provided by Elite were 'disclaimed' by the Joint Administrators in accordance with GIA11 and GIR14 with effect from (and including) 15 September 2020. Further details can be found on page 8 of this report.

## Italy

As previously reported, the Joint Administrators have liaised with the relevant authorities and can confirm that there is no relevant compensation protection available to Elite's Italian policyholders. Policyholders should seek their own advice in this regard.

## Ireland

The Joint Administrators have corresponded directly with the Irish State Claims Agency regarding potential eligibility for compensation for Elite's Irish policyholders. Payment made by the Irish Insurance Compensation Fund against each claim is capped at 65% of the claim value or €825,000, whichever is the lesser. The next step will be submission of an application to the Irish High Court for orders permitting payments out of the fund.

## Greece

The Joint Administrators are aware that a compensation fund is available for Greek motor policyholders. We are continuing to explore the applicability and availability of the Greek motor compensation fund to Elite's policyholders, in particular, the operational costs associated with submitting valid claims.

## Other jurisdictions

As and when required, we will investigate policyholder protection in other European countries but at the present time the Joint Administrators do not expect any further compensation schemes to be available to Elite's policyholders.

## Brokers and agents

As outlined in the Proposals, from the date of appointment all authority for brokers, intermediaries, agents and coverholders to account on a net basis with Elite was withdrawn. All accounting involving Elite should be on a principal to principal basis. There should be no netting off of sums of any nature collected on behalf of Elite against payments due from Elite to any other policyholders or any other creditors of any nature with whom brokers, intermediaries, agents and coverholders do business, whether in respect of claims, premiums, expenses or otherwise. Accordingly, brokers, intermediaries, agents and coverholders who have collected reinsurance or other amounts on behalf of the Company, including premiums, should remit these to us in full immediately.

## Run-off management

### Operations

Armour remains the initial point of contact for the vast majority of Elite's claims handling. A specialist outsourcer, ACS Solutions, was retained to deal with French construction claims through a number of specific coverholders.

During the Period, in excess of 1,100 insurance claims were adjusted and closed, with a value of approximately £3.2m and €20k including fees as well as indemnity amounts. In addition, the Joint Administrators have worked with Armour in defending a number of high value contentious claims. A number of these claims were settled with positive outcomes for the general body of creditors.

We continue to oversee Elite's complaints processes administered by Armour, only dealing directly with customer complaints where necessary. Approximately 170 complaints were closed during the Period. The majority of these related to coverage complaints, of which 45 were upheld.

Following our appointment as Joint Administrators, a number of Elite's suppliers ceased providing their services. As a result, we have had to manage various supplier arrangements, in particular regarding the provision of legal services to ensure, where required, that Elite retains continuity of service or puts in place arrangements to protect creditors' interests.

### Strategic review of Elite's business

During the Period, we worked with Armour and our legal advisers to review a number of Elite's significant portfolios in order to investigate the most appropriate strategy for managing the run-off of each book of business.

## **French business**

The French construction insurance contracts represented approximately 70% of Elite's total reserves as at the date of Administration. As previously mentioned, French policyholders are not entitled to compensation under the French compensation scheme. However, there are alternative sources of recovery available to some policyholders, particularly DO policyholders, who may be able to obtain recovery in full directly from other sources, such as solvent insurers of the contractors who worked on the relevant projects, rather than waiting for a distribution from the Company which will be delayed, and is highly unlikely to be 100 pence in the pound. The Joint Administrators encourage policyholders to fully investigate such options in order to seek settlement of their claims at an earlier stage and potentially in full.

During the Period, the Joint Administrators considered various options for the French Construction portfolio including a sale of the entire book, running off or disclaiming the book. The Joint Administrators concluded that an insolvent run-off or the sale of the portfolio were not viable options.

With respect to an insolvent run-off, the Company did not have sufficient cash reserves to process and assess claims arising from policies in the portfolio. Sale of the French construction book was not possible without materially subsidising the reserves for a buyer which would have included paying a substantial amount of cash, in order to achieve a sale or transfer. This would have significantly depleted or exhausted Elite's assets.

The Joint Administrators therefore decided that disclaiming the portfolio was the most appropriate course of action. Consequently, all French construction insurance policies provided by Elite have been 'disclaimed', in other words, terminated, by the Joint Administrators in accordance with GIA11 with effect from (and including) 15 September 2020. Under GIA11, policyholders, and any other person whose rights are affected by the disclaimer, can submit a claim in Elite's Administration for any loss or damage they suffered as a consequence of the disclaimer.

Further information can be found on our website at: <https://www.pwc.co.uk/services/business-restructuring/administrations/elite-insurance/latest-news-and-update/important-information-for-french-construction-policyholders.html>

## **UK ATE business**

As noted in our previous report, it was not feasible to transfer the entire book of business to another provider. During the Period, the Joint Administrators concluded their investigations into the overall strategy for the book of business. Due to the complex and onerous nature of these policies, a decision was taken to 'disclaim', in other words, terminate, these policies in accordance with GIA11 with effect from and including 11 December 2020. Under GIA11, policyholders, and any other person whose rights are affected by the disclaimer, can submit a claim in Elite's administration for any loss or damage they suffered as a consequence of the disclaimer.

Further information can be found on our website: <https://www.pwc.co.uk/services/business-restructuring/administrations/elite-insurance/latest-news-and-update/important-information-for-after-the-event-policyholders.html>

### ***Delegated Authority ATE***

Prior to the disclaimer, the Joint Administrators continued to engage with delegated authority firms regarding claims submitted under DA ATE policies, liaising with the FSCS to confirm eligibility for FSCS protection on a case by case basis. The Joint Administrators continue to liaise with the FSCS in relation to availability of FSCS protection in relation to DA ATE policies.

The Joint Administrators also continue to seek recovery of premiums collected and retained by solicitor firms from successful DA ATE cases.

### ***Rate Based ATE***

The Joint Administrators continued investigations into the book of business including the transfer of certain individual policies to other insurers which were completed prior to the disclaimer.

In July 2020, we achieved settlement of a number of claims from individual policyholders as a result of working with the FSCS to confirm policyholder protection eligibility. We continue to liaise closely with the FSCS around eligibility in relation to other RB ATE claims that were notified prior to the disclaimer.



## **Other portfolios**

The Joint Administrators have continued to review Elite's other major portfolios. We have worked with Armour to evaluate options and prepare initial strategic plans for Elite's Italian, UK Building Guarantee and UK Insurance Backed Guarantee portfolios. We have also sought input from the FSCS and FCA in respect of the UK portfolios.

### *Italy*

Elite's Italian portfolio consists of several different books of business including surety bond business, professional indemnity and third party liability business as well as donations business.

The surety bonds book is the largest where the bonds are typically performance or completion bonds in relation to construction projects. This business was written by one coverholder, Olimpia Agency S.P.A. The Joint Administrators have successfully negotiated the recovery of policyholder data from the coverholder, which was received after the period on 30 December 2020 and will assist in finalising the future strategy for the portfolio.

Claims activity with respect to the surety bonds business and other Italian books was relatively low and in line with expectations during the Period. The Joint Administrators currently anticipate continuing to run-off the Italian portfolio until an exit from the Administration is proposed.

### *UK Insurance Backed Guarantee*

The Joint Administrators have entered into non-disclosure agreements with three parties with a view to putting in place replacement cover for the policyholders of this book of business. Whilst replacement cover on other books of businesses have not yielded any positive interest, on this book, a number of parties expressed potential interest in offering replacement cover. However, the ability to provide replacement cover is complicated by the poor quality and incompleteness of the policyholder and policy data. We await feedback from the respective parties following their review of the available data, and in the meantime we continue to agree claims as they arise, with the FSCS providing compensation to eligible claimants at 90% of the claims value.

### *UK Building Guarantee*

During the Period, a small number of building guarantee claims were submitted to Armour. All valid claims have been agreed as they have arisen, with the FSCS providing compensation to eligible claimants at 90% of the claim's value. The Joint Administrators would like to highlight that the FSCS's recent change in protecting building guarantee claims at 100% does not apply to Elite's policies. This is because the change in protection is only effective for insurance insolvencies which started after 8 October 2020.

The Joint Administrators are aware of historic policy and policyholder data issues. The lack of available data continues to impact the ability to accurately understand Elite's potential risks for this book of business and understanding for whom policies have been written. Where policyholders require the issuance of a replacement certificate for their policy, the Joint Administrators' can only issue these for policies which are able to be supported with full evidence of a live policy underwritten by Elite. Additionally, the Joint Administrators are unable to issue final certificates for newly developed buildings. The Joint Administrators continue to assess the options to provide a longer term solution for the policyholders.

During the Period, the Joint Administrators have investigated potential claims in relation to losses arising from the binding agreement between Elite and the coverholder on this book, and where appropriate have taken steps to advance such claims. This matter remains under review.

## **Asset recoveries**

### **Reinsurance**

Prior to the Joint Administrators' appointment Elite had agreed, but not formally completed, a commutation with a major reinsurer. During the Period, the Joint Administrators reviewed and considered it in detail in order to determine if it was in creditors' interests to complete the commutation. We also discussed the commutation with Elite's Creditors' Committee which supported our conclusion to complete it.

As previously reported, initial consideration under the commutation of c.£32m was received by Elite on 16 July 2020. Further contingent consideration under the commutation may be receivable by Elite and any developments will be reported in future progress reports.

The Joint Administrators have engaged with Armour to discuss potential recovery strategies and understand past collection initiatives from other reinsurers. This included a detailed review of issues and engaging with brokers where necessary to gather relevant background information. A large post Administration motor claim triggered recoveries on the Excess of Loss reinsurance programme totalling £380k. Having notified reinsurers of this potential loss in the previous months, this amount was successfully recovered in full in July 2020. Further interim orders totalling £70k were made in relation to this motor claim and recovered during September and October 2020.

Additionally, one of Elite's largest reinsurance debtors was vigorously pursued for a recovery. After lengthy correspondence and negotiation, £700k was received in full and final settlement of this debtor's quota share on 9 August 2020. The Joint Administrators are in the process of collecting further reinsurance recoveries in relation to the Excess of Loss reinsurance programme.

This brings total reinsurance recoveries to c.£37m.

### **ATE - Delegated authority and rate based recoveries**

During the Period, a total of c.£2.0m was recovered across the ATE portfolio. This comprised approximately £1.3m collected from solicitors' firms in respect of successful DA ATE cases where premiums had been collected by the solicitors, and c.£740k in relation to RB ATE recoveries.

This brings total ATE recoveries to c.£2.2m.

We also concluded negotiations on the transfer of a policy written on a coinsurance basis to the co-insurer, with Elite to retain an entitlement to an estimated £250k share of any future premium without retaining any risk. Furthermore, a contingent sum of £1.5m will become payable to Elite if a specific case is successful, while Elite is no longer on risk in relation to that case.

### **Claims recoveries**

During the Period, c.£110k was obtained from UK claims recoveries. Elite has also pursued recoveries within its European jurisdictions and has recovered c.€80k from the French business.

This brings total claims recoveries to £175k and €306k.

Additionally, a recovery of £216k was made after the Period in January 2021 in respect of a Solicitors' professional indemnity insurance claim.

### **General recoveries**

#### *Recovery of a third-party loan*

As mentioned in the previous report, the Joint Administrators entered into a settlement agreement with an underwriting partner to resolve a number of claims. The net result achieved return of a capital investment totalling c.£830k received during the Period.

#### *Other recoveries*

During the Period, c.€140k has been recovered relating to monies being held on account by Elite's former French fiscal agent.

The Joint Administrators continue to pursue a number of other potential asset recoveries in various jurisdictions and will provide updates in future progress reports.

### **Treasury management**

As previously reported, the Joint Administrators secured all cash held by the Company in pre-appointment bank accounts and have subsequently transferred the majority of this to new post-appointment bank accounts. Wherever possible, funds are being held in interest bearing accounts.

### **Infrastructure**

During the Period, Armour continued to operate as the run-off manager in line with the Run-off Management Agreement and within the forecast budget.

A budget and a cash flow model for the expected duration of the Administration have been maintained. Receipts and Payments processing has been managed efficiently, with appropriate sanctions review processes in place. Bank reconciliations are performed on a monthly basis for both the remaining pre-Administration accounts and post-Administration accounts.

During the Period we also liaised with fiscal representatives in a number of European jurisdictions to identify and comply with local regulatory and compliance requirements.

## **Corporation tax and VAT**

The Joint Administrators continue to liaise with Armour and local fiscal representatives to obtain relevant information required to deal with the Company's tax affairs and understand the pre and post appointment liabilities in all jurisdictions including the UK, Gibraltar, France, Italy and Spain.

We continue to review and submit tax returns to ensure compliance in all jurisdictions, including associated approval and processing of any resulting tax liability payments. We also continue to explore potential Italian tax recoveries on payments made on account pre Administration. As part of our tax compliance work, we have submitted the following during the Period:

- Outstanding corporate tax filings, insurance premium tax and withholding tax filings in Italy; and
- Post-appointment insurance premium tax returns in Ireland and the UK.

During the Period we have written to HMRC to notify them of the corporation tax residency position in the UK and are now considering our next steps in relation to this matter. We have considered all of our options and potential related tax implications.

We held a meeting with the tax authorities in Spain in order to understand the background to certain actions undertaken by them and to gain authorisation to access all tax files held on record for the Company's Spanish branch. We continue to liaise with specialists to understand the nature of the tax debts claimed by the tax authorities in order to protect potential future recoveries.

We have investigated and responded to tax filing requests from the French tax authorities.

We have undertaken analysis in order to ensure compliance with the EU mandatory disclosure regime for arrangements that have taken place in the post-appointment period. We continue to monitor the activities in all jurisdictions to ensure that the Company is compliant.

## **Stakeholder engagement**

### **Policyholder communications**

The Joint Administrators have ensured that key stakeholders, including policyholders and Creditors, have been apprised of progress made in a timely manner. We have regularly updated the Company website with relevant communications, press releases and frequently asked questions. During the Period we received over 7,000 website visits. Approximately 3,000 were unique user visits.

We have also responded to more than 700 policyholder and other stakeholder queries via our dedicated helplines or by email.

### **Regulatory engagement**

The Company remains an authorised and regulated insurance company and as such must comply with various regulatory requirements. We continue to engage with the GFSC and cooperate with other regulators as appropriate on the progress of the Administration and regulatory reporting matters that arise.

### **Creditors' Committee**

On 3 April 2020 the Creditors of the Company approved the Administrators' Proposals including the establishment of a Creditors' Committee. Details of the Committee members can be found in the progress report dated 5 August 2020.

We held a virtual meeting with the Creditors' Committee on 22 June 2020 during which a fees sub-committee was formed consisting of Hannover Re (Ireland) DAC and the FSCS. A further meeting was held with the Creditors' Committee on 23 October 2020 during which the fee resolutions detailed on pages 12/13 were approved.

In addition to formal meetings, we continue to engage with the Creditors' Committee to discuss key issues and the progress of the Administration.

### **Directors' conduct and investigations**

As previously mentioned, one of our duties is to look at the actions of anybody who has been a director of the Company in the period before our appointment.

Please note that we will not be able to publish our findings and work in this area, but we have complied with our duties in accordance with GIA11. Nothing further has come to our attention during the Period to suggest that we need to do anything further to comply with our duties in this respect.

We also have to decide whether any action should be taken against anyone to recover or contribute to the Company's assets. If you think there is something we should know about and you haven't yet told us, please complete the relevant section of the Statement of Claim Form, which can be found on the website; <https://www.pwc.co.uk/services/business-restructuring/administrations/elite-insurance/suppliers.html>. This is part of our normal work and doesn't necessarily imply any criticism of the directors' actions.

### **Communications**

The Joint Administrators continue to use the website [pwc.co.uk/elite-insurance](https://www.pwc.co.uk/elite-insurance) as a means of delivering updates to policyholders and Creditors. Unless you advise us that you wish to receive communications by post, the website will be used as the main method of communication during the Administration. Due to the large number of European policyholders, key parts of the website are available in French and Italian and we continue to translate key documents into these languages.

## **Other Information**

### **Our receipts and payments account**

We set out in Appendix A an account of our receipts and payments in the Administration for the Period.

### **Administration expenses**

We set out in Appendix B a statement of the expenses we've incurred during the Period. The statement excludes any potential tax liabilities that we may need to pay as an Administration expense in due course, as amounts due will depend on the position at the end of the tax accounting period.

### **Our fees**

We set out in Appendix C an update on our remuneration which covers our fees, disbursements and other related matters in this case.

As mentioned above, on 23 October 2020 the Creditors' Committee approved the following resolutions in accordance with section 464(1)(a) of GIA11, taking into consideration the principles set out in section 466 of GIA11 authorising the Joint Administrators to draw remuneration as follows:

1. Approval to draw fees on a time and materials basis. PwC's market rates are to be applied for the period 29 November 2019 to 30 June 2020. Rates shall be increased by 3% annually from 1 July 2020.
2. Approval to draw 100% of the pre-Administration fees for the period 29 November 2019 to 10 December 2019.
3. Approval to draw 75% of the post-Administration fees for the period 11 December 2019 to 10 August 2020. 25% of these fees shall be deferred, subject to point 5.
4. At the end of each month, approval to draw 75% of the post-Administration fees incurred during the preceding month(s) for which fees have not already been drawn. 25% of these fees shall be deferred, subject to point 5.

5. On declaration of a first distribution, approval to discuss with the Creditors' Committee the value the Administrators have achieved, in order to establish whether all or a proportion of the deferred fees, incurred up to the distribution declaration date, can be released. Please note, should the Creditors' Committee agree to a release of a proportion of the deferred fees incurred to the declaration date of the first distribution, any unreleased proportion may still be released at a later date, at the Creditors' Committee's discretion.

On 9 November 2020, pre-Administration fees of £253k were drawn. On 29 October 2020, post-Administration fees of c.£4.2m were drawn and a further c.£142k will be drawn shortly. These cover the period 11 December 2019 to 10 August 2020 at 75%.

Outside the Period, on 16 December 2020, post-Administration fees of c.£1.0m were drawn and a further c.£54k will be drawn shortly. These cover the period 11 August 2020 to 10 November 2020 at 75%.

This brings the total amount of Administrators' remuneration drawn to c.£5.2m. Deferred fees (25%) as described at point 5 above, and not yet drawn for the period 11 December 2019 to 10 November 2020 total c.£1.8m.

### Connected party transactions

Please note that Armour were retained by the Joint Administrators' as run-off agent for the Company. There have been no other sales or transactions with connected parties of the Company during the Period, and none are expected in the future.

### What we still need to do

The Administration of the Company is complex given the wide range of portfolios it underwrote and territories it operated in. Our focus over the next six months will be:

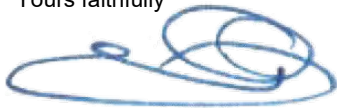
- Ensuring policyholder claims are dealt with appropriately and where compensation schemes exist are paid promptly;
- Vigorously pursuing asset and other recoveries of the Company;
- Completing our strategic review of each of the Company's major books of business and where appropriate implementing strategies that will benefit Creditors as a whole; and
- Considering the most appropriate exit mechanism from Administration with a view to maximising the return to Creditors at the earliest possible stage.

### Next steps

We are currently considering the best strategy for ending the Administration, taking into account any tax or further costs implications. We expect to send our next report to Creditors in about six months.

If you have any questions, please get in touch by email at [uk\\_elite@pwc.com](mailto:uk_elite@pwc.com)

Yours faithfully



For and on behalf of the Company

Edgar Lavarello

Joint Administrator

Edgar Lavarello and Dan Schwarzmann have been appointed as Joint Administrators of Elite Insurance Company Limited to manage its affairs, business and property as agents and act without personal liability. Edgar Lavarello is authorised to act as an insolvency practitioner by the GFSC in Gibraltar (IP Licence Number FSC 0892 FSA). Dan Schwarzmann is authorised to act as an insolvency practitioner by the Institute of Chartered Accountants in England and Wales in England (IP Licence number 8912).

The Joint Administrators are bound by the Insolvency Code of Ethics which can be found at: <https://www.gov.uk/government/publications/insolvency-practitioner-code-of-ethics>

The Company is authorised and regulated by the GFSC. Registered office: c/o PricewaterhouseCoopers Limited, 327 Main St, GX11 1AA, Gibraltar. The Joint Administrators may act as controllers of personal data as defined by UK Data Protection Act 2018, the General Data Protection Regulation 2016/679 and any applicable Gibraltar or other data protection laws (as applicable), depending upon the specific processing activities undertaken. PwC may act as a data processor on the instructions of the Joint Administrators. Personal data will be kept secure and processed only for matters relating to the Joint Administrators' appointment. Further details are available in the privacy statement on the [www.pwc.co.uk](http://www.pwc.co.uk) website or by contacting the Joint Administrators.

# Appendix A: Receipts and payments

	As at 10 December 2020		NZD	As at 10 December 2020 Total GBP equivalent	Movements from 11 June 2020 to 10 December 2020 (GBP Equivalent)	As at 10 June 2020 (GBP equivalent) RESTATED at 10 December 2020 exchange rate	As at 10 June 2020 GBP equivalent
	GBP	EUR					
<b>Receipts</b>							
Cash at bank	12,236,858	5,362,089	–	17,135,533	16,833,131	302,402	299,750
Cash - NatWest Gibraltar*	16,307	251,338	–	245,923	-16,979,060	17,224,983	16,968,805
Claim recoveries	174,539	305,506	–	453,642	202,977	250,666	245,553
Interest	7,520	–	1,733	8,444	7,783	661	661
Investments & Shares	979,711	17,375	–	995,584	–	995,584	995,173
Gross premium - ATE premium	2,230,233	1,891	–	2,231,961	1,995,333	236,628	236,628
Sundry debts and refunds	5,012	–	–	5,012	716	4,296	4,251
Tax/Insurance/Other refunds	–	144,063	–	131,612	131,612	–	–
Insurance recoveries	833,333	–	–	833,333	833,333	–	–
Reinsurance recoveries	37,066,877	76,328	–	37,136,608	33,653,622	3,482,986	3,481,181
<b>Receipts total</b>	<b>53,550,390</b>	<b>6,158,590</b>	<b>1,733</b>	<b>59,177,652</b>	<b>36,679,447</b>	<b>22,498,206</b>	<b>22,232,002</b>
<b>Payments</b>							
Office Holders' fees	4,182,142	–	–	4,182,142	4,182,142	–	–
Pre-administration Office Holder's fees	253,750	–	–	253,750	253,750	–	–
Run-off services	1,477,580	–	–	1,477,580	805,392	672,188	672,188
Claims handling expenses	252,552	537,484	–	743,584	635,524	108,060	108,014
Professional fees	24,249	66,234	–	84,759	71,613	13,146	13,146
Printing, stationery & postage	171,611	10,657	–	181,347	111,947	69,400	69,267
Legal fees and expenses	2,228,763	447,279	–	2,637,387	1,166,946	1,470,440	1,466,016
Statutory advertising	65,419	–	–	65,419	13,672	51,747	51,747
Taxation costs	179,223	13,446	–	191,507	183,177	8,329	8,317
Irrecoverable VAT	442,087	12,108	–	453,148	185,264	267,884	267,857
Bank charges	23,710	1,111	–	24,724	24,244	480	471
<b>Payments total</b>	<b>9,301,086</b>	<b>1,088,319</b>	<b>0</b>	<b>10,295,347</b>	<b>7,633,671</b>	<b>2,661,674</b>	<b>2,657,023</b>
<b>NET POSITION</b>	<b>44,249,304</b>	<b>5,070,271</b>	<b>1,733</b>	<b>48,882,305</b>	<b>29,045,776</b>	<b>19,836,532</b>	<b>19,574,979</b>
<b>Made up as follows</b>							
	GBP	EUR	NZD	As at 10 December 2020 Total GBP equivalent	<b>Exchange rates - (Bank of England)</b>		
Barclays UK	2,232,174	268,932	1,733	2,478,787	10 June 2020	£1 to Eur 1.1237	
HSBC UK	15,000,822	–	–	15,000,822	10 December 2020	£1 to Eur 1.0946	
NatWest Gibraltar	16,308	251,339	–	245,926	10 June 2020	£1 to NZD 1.9560	
Money Market Deposits	27,000,000	4,550,000	–	31,156,770	10 December 2020	£1 to NZD 1.8761	
	<b>44,249,304</b>	<b>5,070,271</b>	<b>1,733</b>	<b>48,882,305</b>			

\*During the Period, funds were transferred to the Joint Administrators' bank account. These movements have been reflected across multiple categories.

# Appendix B: Expenses

The following table provides details of our expenses. Expenses are amounts properly payable by us as Joint Administrators from the estate and includes our fees but excludes distributions to Creditors. The table also excludes any potential tax liabilities that we may need to pay as an Administration expense because amounts becoming due will depend on the position at the end of the tax accounting period. The table should be read in conjunction with the receipts and payments account at Appendix A, which shows expenses actually paid during the Period and the total paid to date.

Nature of expenses	GBP	EUR
	Incurred in the Period (£)	Incurred in the Period (€)
Run-off services	896,154	0
Claims handling expenses	155,029	546,618
Professional fees	11,103	57,640
Printing, stationery & postage	107,336	4,342
Legal fees and expenses	1,314,228	216,749
Statutory advertising	13,672	0
Taxation costs	171,365	12,807
Bank charges	444	6,201
Office holders' fees	3,396,723	0
Office holders' disbursements	2,509	0
<b>Total expenses</b>	<b>6,068,565</b>	<b>844,357</b>

# Appendix C: Remuneration update

On 23 October 2020 the Creditor's Committee approved the resolutions authorising the Joint Administrators to draw remuneration on the basis mentioned earlier in the report.

## Our hours and average rates

The time cost charges incurred in the Period total £3.4m. This is 6,990 hours at an average hourly rate of £486.

The table below shows a breakdown of this.

								Period Total		Total from 11 December 2019 to 10 December 2020	
	Partner	Director	Senior Manager	Manager	Senior Associate	Associate/ Other	Offshore Professionals	Hours	Total Cost (£)	Hours	Total Cost (£)
Accounting & Treasury	1,159	3,245	1,094	83,591	68,495	27,168	-	518	184,752	1,151	453,138
Assets	13,065	192,050	154,556	17,967	305,884	52,935	-	1,636	736,457	3,770	1,851,683
Creditors	2,124	3,684	53	16,982	23,640	69,548	-	404	116,031	1,030	370,124
Run-off management supervision	26,916	1,723	296,606	447,694	219,392	44,292	-	1,980	1,036,623	4,062	2,201,150
Statutory & compliance	19,992	29,957	8,991	265,790	79,041	25,235	-	881	429,006	1,834	893,223
Strategy & planning	18,793	267,925	59,124	154,947	72,918	10,621	10,469	1,014	594,797	2,015	1,265,797
Tax & VAT	28,449	7,731	25,734	155,183	56,270	27,334	-	557	300,701	1,282	754,449
<b>Total for period</b>	<b>110,498</b>	<b>506,315</b>	<b>546,158</b>	<b>1,142,154</b>	<b>825,640</b>	<b>257,133</b>	<b>10,469</b>	<b>6,990</b>	<b>3,398,367</b>	<b>15,144</b>	<b>7,789,564</b>
<b>Average hourly rate (£)</b>	<b>1,001</b>	<b>807</b>	<b>653</b>	<b>533</b>	<b>365</b>	<b>267</b>	<b>216</b>		<b>486</b>		<b>514</b>



## Our time charging policy and hourly rates

We and our team charge our time for the work we need to do in the Administration. We delegate tasks to suitable grades of staff, taking into account their experience and any specialist knowledge that is needed, and we supervise them properly to maximise the cost effectiveness of the work done. Anything complex or important matters of exceptional responsibility are handled by our senior staff or us.

All of our staff who work on the Administration (including our cashiers) charge time directly to the case and are included in any analysis of time charged. Each grade of staff has an hourly charge out rate which is reviewed from time to time. Work carried out by our support and secretarial staff is charged for separately and is not included in the hourly rates charged by partners or other staff members. Time is charged in six minute units in the UK and 15 minute units in Gibraltar. We do not charge general or overhead costs.

In common with many professional firms, our scale rates may rise to cover inflationary cost increases. In accordance with the agreement with the Creditors' Committee charge out rates were increased by 3% from 1 July 2020.

We set out below the maximum charge-out rates per hour for the grades of our staff. The Joint Administrators' core team is made up of both UK and Gibraltar staff. Where the Joint Administrators draw on the expertise of specialists within the firm such as actuarial and tax experts, bespoke rates apply.

Grade	Rate - UK, £/hour	Rate - Gibraltar, £/hour	UK Bespoke Rate, £/hour
Partner	937	773	1,566
Director	824	618	1,313
Senior Manager	623	427	1,329
Manager	541	340	798
Senior Associate	448	206	391
Associate	278	103	294
Other	144	N/a	273
Offshore Professionals	216	N/a	N/a

These rates include an agreed discount from standard scale rates.

## Our work in the Period

Whilst this is not an exhaustive list, in the following table we provide more detail on the key areas of work:

Area of work	Work undertaken	Why the work was necessary	What, if any, financial benefit the work provided to creditors OR whether it was required by statute
Strategy & planning	<ul style="list-style-type: none"> <li>Regular meetings with Armour to discuss key issues, budgets, operational matters and to provide feedback on service performance.</li> <li>Internal meetings to determine the optimum strategy and progress toward the objectives of the Administration, an indicative timeline, and key milestones.</li> <li>Conducting analysis of the potential options in relation to the French construction and ATE books resulting in the disclaimer decision.</li> <li>Evaluating strategic options to be implemented in order to achieve the objectives of the Administration.</li> </ul>	To ensure case progression and monitor costs	Ensures orderly progression of case and cost management

Area of work	Work undertaken	Why the work was necessary	What, if any, financial benefit the work provided to creditors OR whether it was required by statute
<b>Run-off management supervision</b>	<ul style="list-style-type: none"> <li>• Regular meetings and discussions with members of the Armour claims handling team.</li> <li>• Leading negotiations for a number of large value claims.</li> <li>• Reviewing the budget and supporting evidence provided by the Run-off Manager.</li> <li>• Development of detailed claims handling process for review of the post-disclaimer French damages claims.</li> <li>• Considering each material class of business within the Elite portfolio and documenting key issues impacting each class of business.</li> <li>• Agreeing European claims handling protocol with Armour.</li> <li>• Detailed review of RB ATE cases and claims adjustment, to appropriately handle ongoing claims.</li> <li>• Reviewing DA ATE claims received, requesting documents to support submissions and addressing any associated queries or issues.</li> <li>• Providing approval to Armour, following cost-benefit assessment, for instruction of third-party service providers.</li> </ul>	To ensure returns to the creditors are maximised	Maximising funds for the benefit of creditors
<b>Creditors</b>	<ul style="list-style-type: none"> <li>• Dealing with enquiries from creditors in various European jurisdictions regarding the Administration and individual claims.</li> <li>• Setting up of and participation in the initial meeting of creditors.</li> <li>• Liaising with creditors and policyholders regarding queries and providing website updates.</li> <li>• Setting up the subsequent meeting of creditors including preparation in advance of the meeting.</li> <li>• Receiving nominations and enquiries from creditors and their representatives with regard to the establishment of a Creditors' Committee and fees sub-committee.</li> <li>• Liaising with Creditors' Committee member representatives and observers.</li> </ul>	To keep the creditors informed	Work done in anticipation of returning funds to creditors
<b>Assets</b>	<ul style="list-style-type: none"> <li>• Analysing Company records and pursuing recoveries including reinsurance recoveries, premiums, claims funds and other assets.</li> <li>• Investigating the position and potential outcome of recovery from debtors in insolvency procedures.</li> <li>• Managing the process for potential sale/transfer of both the RB ATE and DA ATE businesses.</li> <li>• Negotiating with debtors.</li> </ul>	To ensure returns to the creditors are maximised	Realises funds for the benefit of creditors

Area of work	Work undertaken	Why the work was necessary	What, if any, financial benefit the work provided to creditors OR whether it was required by statute
<b>Accounting &amp; Treasury</b>	<ul style="list-style-type: none"> <li>• Reviewing balances held in pre-Administration accounts to ensure compliance with the PwC UK cash management policy.</li> <li>• Engaging with the Company's pre-appointment bankers regarding the safeguarding of cash and transferring funds into the post-appointment bank accounts.</li> <li>• Processing all incoming funds via the Administrators' accounting system in order to ensure consistency of coding and clarity of reporting.</li> <li>• Preparing and updating cash flow reporting.</li> <li>• Processing payments, including review and approval by senior case staff.</li> <li>• Producing and reviewing monthly bank reconciliations.</li> </ul>	To manage the Company's bank accounts	Ensures proper management of the funds held
Statutory & compliance	<ul style="list-style-type: none"> <li>• Officeholder oversight.</li> <li>• Reviewing Company books and records.</li> <li>• Managing internal case, filing and accounting systems.</li> <li>• Preparing the Administrators' first progress report detailing activities undertaken by the Administrators.</li> <li>• Detailing the pre and post Administration fees.</li> <li>• Liaising with the relevant Regulators and third-party stakeholders.</li> <li>• Maintaining our records, preparing file notes, filing relevant emails and supporting documentation</li> <li>• Preparing and issuing all statutory documents, notices and reports as required.</li> <li>• Compliance activities such as Anti Money Laundering checks, sanctions screening and information handling protocol.</li> </ul>	To comply with statutory obligations	Required by statute / regulation
<b>Tax &amp; VAT</b>	<ul style="list-style-type: none"> <li>• Ongoing work to understand post appointment liabilities in various jurisdictions.</li> <li>• Ongoing work with several specialists to best understand VAT residency and corporation tax residency of the Company.</li> <li>• Continued investigation into potential tax related recoveries in different European jurisdictions.</li> <li>• Ongoing consideration of tax compliance matters in all territories the Company operated in.</li> </ul>	To comply with statutory obligations	Required by statute and ensures the appropriate payment of corporation tax, for the benefit of creditors

## Our future work

We still need to do the following work to achieve the purpose of the Administration.

Area of work	Our Future work	What, if any, financial benefit the work provided to creditors OR whether it is required by statute
<b>Strategy &amp; planning</b>	<ul style="list-style-type: none"> <li>Monitoring Armour performance against budget.</li> <li>Quarterly meetings to discuss performance and Management Information.</li> <li>Managing the process following the disclaimer of both the RB ATE and DA ATE businesses whilst continuing to manage the few active cases.</li> <li>Continue to investigate appropriate strategies for the remaining books of business.</li> <li>Investigate possible exit mechanisms from the Administration.</li> <li>Further work to be completed on suppliers and contracts.</li> </ul>	Ensures orderly progression of case and cost management
<b>Run-off management supervision</b>	<ul style="list-style-type: none"> <li>Reviewing payments and supporting evidence in relation to FSCS eligible policyholders.</li> <li>Continuing to negotiate large value claims.</li> <li>Reviewing and responding to referrals from Armour claims handlers and approving actions with respect to large value, litigated claims or claims recoveries from third parties.</li> <li>Overseeing complaints handling.</li> <li>Adjudication of claims.</li> <li>Continuing to explore potential eligibility for compensation for Elite's Irish policyholders.</li> </ul>	Maximising funds for the benefit of creditors
<b>Creditors</b>	<ul style="list-style-type: none"> <li>Liaising with Creditors.</li> <li>Responding to queries from Direct Insurance Creditors.</li> <li>Agreeing Direct Insurance Creditor claims.</li> <li>Maintaining an estimated outcome statement.</li> <li>Preparation and payment of dividends.</li> </ul>	Work done in anticipation of returning funds to creditors
<b>Assets</b>	<ul style="list-style-type: none"> <li>Analysing Company records and pursuing recoveries including reinsurance recoveries, premiums, claims funds and other assets.</li> <li>Corresponding with reinsurance debtors regarding settlements following case by case cost benefit analysis.</li> </ul>	Realises funds for the benefit of creditors
<b>Accounting &amp; treasury</b>	<ul style="list-style-type: none"> <li>Bank reconciliations.</li> <li>Currency hedging analysis.</li> <li>Accounting for payments and receipts into the case bank accounts.</li> <li>Processing payments.</li> <li>Closure of bank accounts.</li> <li>Dealing with unbanked dividend cheques.</li> </ul>	Ensures proper management of the funds held
<b>Statutory &amp; compliance</b>	<ul style="list-style-type: none"> <li>Preparing and submitting six monthly progress reports to Creditors.</li> <li>Complying with statutory filing requirements.</li> <li>Preparing and circulating the final report.</li> </ul>	Required by statute / regulation
<b>Tax &amp; VAT</b>	<ul style="list-style-type: none"> <li>Completing tax returns.</li> <li>Obtaining HMRC clearance.</li> <li>Tax recoveries.</li> </ul>	Required by statute and ensures the appropriate payment of corporation tax, for the benefit of creditors

Area of work	Our Future work	What, if any, financial benefit the work provided to creditors OR whether it is required by statute
<b>Closure</b>	<ul style="list-style-type: none"> <li>• Obtaining clearances for closure.</li> <li>• Closure procedures.</li> <li>• Winding down the Company's affairs generally.</li> </ul>	Required by statute, ensures all administration matters have been dealt with

## Payments to associates

We have instructed the following professionals on this case due to their jurisdictional expertise and for efficiency purposes:

Service provided	Name of firm / organisation	Jurisdiction	Basis of fees	Amount (€)
Legal and Professional Services	PwC Legal SARL	Luxembourg	Time costs and disbursements	26,081
Professional Services	PricewaterhouseCoopers Advisory SpA	Italy	Time costs and disbursements	6,500
Tax and Regulatory	Landwell - PricewaterhouseCoopers Tax & Legal Services, S.L.	Spain	Time costs and disbursements	7,800

As required with all third party professionals, submission of time costs analyses and narrative, or a schedule of realisations achieved dependent on their fee basis, is supplied in support of invoices rendered. All invoices are reviewed before being approved for payment. We are satisfied that the level of costs is appropriate.

## Disbursements

Disbursement are costs paid by the Joint Administrators which will be recharged to the estate in due course. Disbursements totalling £10,839 are set out below and may include an element of overheads. These will be drawn shortly.

	Total (£)
Pre-Appointment	2,225
Post Appointment 11/12/2019 to 10/6/2020	6,105
Post Appointment 11/6/2020 to 10/12/2020	2,509
<b>Total</b>	<b>10,839</b>

## Our relationships

Other than previously disclosed, we have no business or personal relationships with the parties who approve our fees or who provide services to the Administration where the relationship could give rise to a conflict of interest.

## Legal and other professional firms

In addition to the associates previously mentioned, we've instructed the following professionals on this case:

Service provided	Name of firm / organisation	Reason selected	Basis of fees
<b>Legal services, including:</b> <ul style="list-style-type: none"> <li>Assistance when dealing with and concluding claims</li> <li>Costs incurred when recovering money from claims</li> </ul>	<ul style="list-style-type: none"> <li>Ayache Salama</li> <li>Clyde and Co US LLP</li> <li>Cassel Avocats</li> <li>Freshfields Bruckhaus Deringer LLP</li> <li>Triay and Triay Limited</li> <li>Hassans International Law</li> <li>Da Ros Associes</li> <li>Geoffrey Barthelemy</li> <li>Lexavoue Aiz En Proverance</li> <li>Raphaele Deconstanza</li> <li>Sonia Lods</li> <li>Filip and Company Business Law</li> <li>A and L Goodbody</li> <li>Clamens Conseil</li> <li>Eymard Sablier Associes</li> <li>Jean-Baptiste Meyrier</li> <li>S.C.P. Christophe</li> <li>CMS Adonnino Ascoli &amp; Cavasola Scamoni</li> </ul>	<ul style="list-style-type: none"> <li>Industry knowledge</li> <li>Insolvency expertise</li> <li>Jurisdictional expertise</li> </ul>	Time costs and disbursements
<b>Agents</b> <ul style="list-style-type: none"> <li>Claims handling</li> </ul>	<ul style="list-style-type: none"> <li>Marley Risk Consultants</li> <li>Woodgate and Clark Limited</li> <li>ACS Solutions</li> <li>Armour Risk Management Limited</li> </ul>	<ul style="list-style-type: none"> <li>Policyholder knowledge</li> <li>Claims handling experience</li> </ul>	Time costs and disbursements

We require all third party professionals to submit time costs analyses and narrative or a schedule of realisations achieved, dependent on their fee basis, in support of invoices rendered. All invoices are reviewed before being approved for payment. We are satisfied that the level of legal and professional costs is appropriate.

# Appendix D:

## Other information

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<b>Court details for the Administration:</b>	The Supreme Court of Gibraltar Case number: 2019/COMP/002
<b>Full and Trading name:</b>	Elite Insurance Company Limited
<b>Registered number:</b>	91111
<b>Registered address:</b>	Suite 23, Portland House, Glacis Road, Gibraltar
<b>Company directors:</b>	Brad Scott Huntington John Caldicott Williams
<b>Company secretary:</b>	Fiduciary Management Limited
<b>Shareholdings:</b>	Issued share capital 2,600,000 Ordinary shares of £1 each 100% owned by Gunnary Limited
<b>Date of the Administration appointment:</b>	11 December 2019
<b>Joint Administrators' names and addresses:</b>	Edgar Charles Andrew Lavarello of PricewaterhouseCoopers Limited, 327 Main Street, Gibraltar and Dan Yoram Schwarzmann of PricewaterhouseCoopers LLP, 1 Embankment Place, London, WC2N 6RH UK
<b>Appointer's/applicant's name and address:</b>	The directors of the Company c/o Suite 23, Portland House, Glacis Road, Gibraltar
<b>Website:</b>	<a href="http://www.pwc.co.uk/elite-insurance">www.pwc.co.uk/elite-insurance</a>
<b>Objective being pursued by the Joint Administrators:</b>	Objective b - achieving a better result for the company's Creditors as a whole than would be likely if the company were wound up (without first being in Administration)
<b>Division of the Joint Administrators' responsibilities:</b>	In relation to the powers set out in schedule 1 of GIA11, during the period for which the Administration is in force, any function to be exercised by the persons appointed to act as Administrators may be done by any or all of the persons appointed or any of the persons for the time being holding that office
<b>Regulation (EU) 2015/848 of the European Parliament and of the Council of 20 May 2015 on Insolvency Proceedings (recast)</b>	The EC Insolvency Regulation does not apply

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