

CREDIT OPINION

14 July 2021

Update

✓ Rate this Research

RATINGS

Direct Line Insurance Group plc

Domicile	BROMLEY, United Kingdom
Long Term Rating	Baa1
Type	Subordinate - Dom Curr
Outlook	Stable

Please see the [ratings section](#) at the end of this report for more information. The ratings and outlook shown reflect information as of the publication date.

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Direct Line Insurance Group plc

Update to credit analysis

Summary

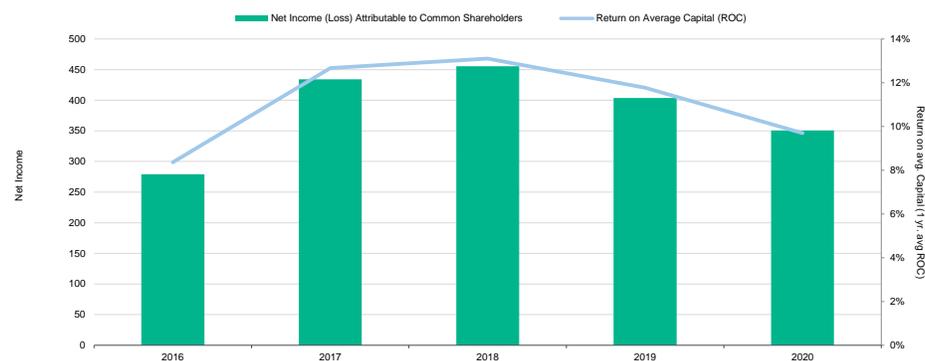
[Direct Line Insurance Group plc's](#) (DLG) main operating entity [U K Insurance Limited](#) (UKI) is rated A1 for insurance financial strength with a stable outlook. The rating reflects (i) DLG's track record of reporting consistently strong return on capital (ROC) and underwriting results, which we believe will be sustained, (ii) very strong position in the UK personal lines general insurance market, (iii) relatively conservative investment portfolio and relatively low financial leverage, and (iv) good capitalisation.

These strengths more than offset the Group's dependence on the very competitive and highly regulated UK personal motor market. Furthermore, there is some execution risk around the change in drivers of future profitability, and around the Group's far-reaching technology transformation although with the roll-out of the new motor technology platform the programme is now largely complete.

At YE20, DLG reported that Covid-19 restrictions reduced claims frequency in Motor and Commercial, although this was partially offset by investment in initiatives to protect customers, people and society, lower investment asset returns and the impact of the Covid-19 pandemic on Travel. Overall, the impact of the Covid-19 pandemic was a modest net benefit to the result.

Exhibit 1

Net Income and Return on Capital



Source: Company reports, Moody's Investors Service

Credit strengths

- » Very strong position in the UK personal lines market, with powerful brands
- » Low exposure to product risk, with a personal lines orientation
- » Consistent track record of strong returns on capital and underwriting results
- » Relatively low financial leverage and strong earnings coverage of interest
- » Relatively conservative investment portfolio

Credit challenges

- » Enhancing contributions, both from a premium and profitability perspective, from non-personal lines motor businesses (e.g. commercial and rescue segments)
- » Successfully execute the roll out of the new technology systems and convert efficiency gains into a lower cost base
- » Sustaining recent underwriting performance in the very competitive UK personal lines market and as the contributions from prior year reserve releases have reduced
- » Navigating and adapting to changes, including the FCA's pricing measures, in the highly regulated and dynamic UK personal lines market
- » Limited geographical and business line diversification in which motor business predominates

Rating outlook

The rating outlook is stable reflecting primarily our expectation that the company will sustain its strong profitability both from a return on capital and underwriting perspective, while maintaining its very strong position in the UK personal lines general insurance market. The stable outlook is also underpinned by our expectation that the Group will maintain its relatively conservative investment portfolio, good capitalisation and relatively low financial leverage.

Factors that could lead to an upgrade

Positive rating pressure could arise from a combination of:

- » Enhanced capital adequacy with gross underwriting leverage of below 2x and Solvency II coverage above 200%;
- » Average ROC (Moody's definition) through the cycle above 15% and a reported combined ratio consistently around 90%;
- » Adjusted financial leverage consistently below 10%;
- » Continued profitable development of non-motor business.

Factors that could lead to a downgrade

Conversely, negative rating pressure could arise from:

- » A material reduction in premiums resulting in a material loss of market share; and/or
- » Average return on capital through the cycle below 8%; and/or
- » Adjusted financial leverage in excess of 25% with earnings coverage below 8x; and/or
- » Meaningful deterioration in capital adequacy as reflected in the Group's Solvency II ratio falling sustainably well below 160%.

This publication does not announce a credit rating action. For any credit ratings referenced in this publication, please see the ratings tab on the issuer/entity page on www.moody's.com for the most updated credit rating action information and rating history.

Key indicators

Exhibit 2

Direct Line Insurance Group plc

Direct Line Insurance Group plc [1][2]	2020	2019	2018	2017	2016
As Reported (Pound Sterling Millions)					
Total Assets	9,622	9,434	9,535	9,948	10,122
Total Shareholders' Equity	3,046	2,990	2,905	3,062	2,522
Net Income (Loss) Attributable to Common Shareholders	351	403	455	434	279
Gross Premiums Written	3,180	3,203	3,212	3,392	3,274
Net Premiums Written	2,949	2,987	2,988	3,184	3,068
Moody's Adjusted Ratios					
High Risk Assets % Shareholders' Equity	21.9%	23.0%	24.8%	23.1%	29.1%
Reinsurance Recoverable % Shareholders' Equity	39.0%	42.5%	42.4%	38.8%	51.6%
Goodwill & Intangibles % Shareholders' Equity	31.7%	29.6%	25.6%	21.6%	26.8%
Gross Underwriting Leverage	2.3x	2.4x	2.6x	2.6x	3.1x
Return on Average Capital (ROC)	9.7%	11.8%	13.1%	12.7%	8.4%
Sharpe Ratio of ROC (5 yr.)	549.5%	422.0%	393.0%	327.2%	219.5%
Adv. (Fav.) Loss Dev. % Beg. Reserves	-6.5%	-10.2%	-12.9%	-12.9%	-8.1%
Adjusted Financial Leverage	19.7%	14.4%	15.0%	14.6%	19.3%
Total Leverage	28.3%	23.7%	24.6%	23.8%	23.4%
Earnings Coverage	10.1x	12.6x	14.3x	13.3x	9.2x

[1] Information based on IFRS financial statements as of the fiscal year ended 12/31/2020. [2] Certain items may have been relabeled and/or reclassified for global consistency.

Sources: Moody's Investors Service and company filings

Profile

DLG is the UK's largest personal lines property and casualty (P&C) insurer, with leading positions in personal motor and home by in-force policies (IFP). The Group underwrites around £3.2 billion of gross written premiums (GWP) through its highly recognised brands — Direct Line, Churchill, Privilege and Green Flag — and partners, including NatWest Group (Baa2 positive).

The Group has four core classes of business — personal motor (representing 51% of premiums at YE 2020), home (18%), rescue and other personal lines (13%), and commercial (18%) which solely comprises SME business. Following the disposal of its international operations in 2015, the group focuses exclusively on the UK P&C market.

The Group was listed on the London Stock Exchange in 2012 after being divested from RBS in July 2012.

Detailed credit considerations

The A1 IFSR is in line with the adjusted scorecard-indicated outcome as shown in the Moody's scorecard (Exhibit 5).

Insurance financial strength rating

The key factors currently influencing the rating and outlook are:

Market position, brand and distribution: Very strong position in the UK personal lines market

As the largest personal motor line writer in the UK as well as one of the leading home writers, we consider DLG's market position to be very strong and its brands, in particular Direct Line and Churchill, to be very powerful. We expect DLG's personal lines market position to remain very strong benefiting from planned growth via the price comparison website (PCW) channel and its rescue (via Green Flag) business. DLG's small and medium-sized enterprise commercial business is growing supported by the Group's investments into risk selection and pricing capabilities, but its overall commercial market share remains relatively modest at this stage.

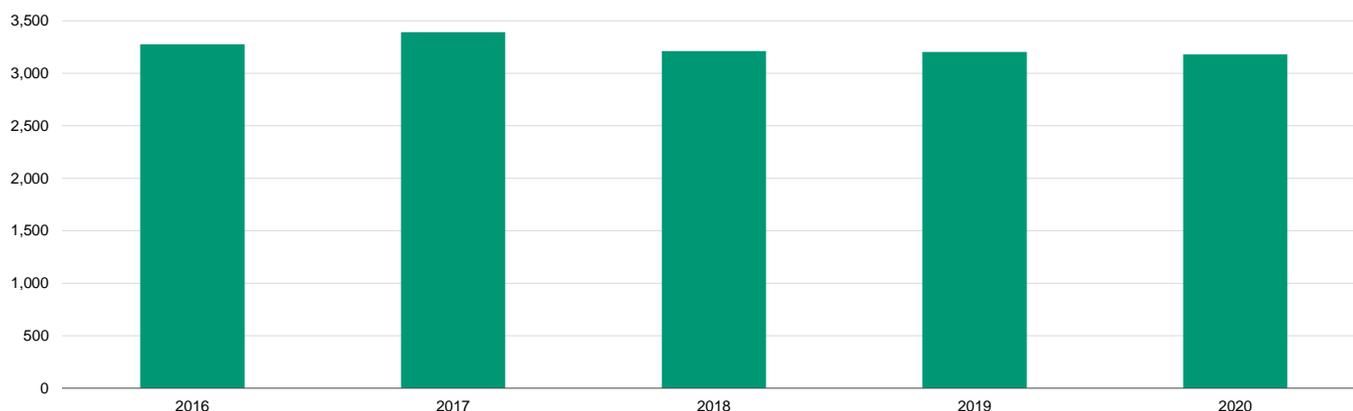
In the medium-to-long term, Moody's also believes that DLG's multi-channel distribution strategy, powerful brands and financial resources will enable the Group to adapt to changes in the market place, particularly as increasing car safety features, electric cars and eventually autonomous vehicles, start to transform the traditional risk pool.

The Coronavirus-induced economic slowdown had a negative impact on DLG's and other UK motor insurers' premiums in 2020 with motor market premium deflation, driven by low levels of new car sales and fewer new drivers, continuing into Q1 21 although there has been greater premium stability from April.

In 2015, DLG started to modestly grow its premium base after several years of decline which reflected management's action to improve performance and difficult pricing conditions. GWP fell by c.5% during 2018, stabilised at YE19 but then fell again in 2020 by around 1% due to falling partnership and travel premium. However, own brand GWP was stable in 2020 with growth across home, commercial and rescue offset by lower average premiums in Motor.

Exhibit 3

Gross Written Premiums evolution £ million



Source: Company reports, Moody's Investors Service

Overall, we view DLG's personal lines distribution as strong, with products sold directly by phone, over the internet, through online aggregators, as well as via partnerships particularly in the home segment. To improve efficiency and effectiveness, DLG has been re-establishing its partnership capabilities, including exiting a number of partnerships and has renegotiated existing deals. For example, in 2018 the Group signed a minimum 5 year partnership deal with Volkswagen Insurance Services (Great Britain), and again extended its travel agreement with Nationwide until 2023. In 2020, it agreed a two-year extension with NatWest Group for home business. The commercial division also benefits from some direct distribution (via Direct Line for Business, "DL4B") and some through the PCW channel (via Churchill for Business), although the majority of premiums are still accessed via brokers. DLG also continues to improve its distribution capabilities by investing in new websites, digital propositions (e.g. Darwin) and by targeting less traditional partnerships. Darwin targets customers who mainly buy through PCWs and uses a smart pricing system to provide a price based on the individual.

Going forward, we expect the Group's expense ratio to reduce, via the implementation of ongoing efficiency programme initiatives, including investments in technology, and top-line growth, and DLG is aiming to improve its operating expense ratio (excluding commissions) to 20% by YE23 (YE20: 24.5%). Nevertheless, the Group's underwriting expense ratio remains relatively high and above its personal-lines-orientated peers, despite the Group's inherent scale advantages. This is driven in part by the need for marketing costs for the Group's direct brands and the Group's ownership of its own garage repair network. DLG's reported total expense ratio increased to 33.1% (YE19: 30.3%) although excluding coronavirus-related costs the Group made progress in reducing its underlying expense base.

Product risk and diversification: Relatively low product risk, offset by limited business diversification and dependence on the UK

DLG writes UK non-life business only, split 82% personal lines and 18% commercial lines. DLG has four main business segments, including motor (51% of GWP and 70% of operating profit in 2020), home (18% and 19%), rescue and other (13% and 1%), and commercial (18% and 10%). In our view, product line diversity is therefore relatively limited in light of the preponderance of personal motor although the Group's commercial business is growing and saw strong GWP growth of 16% at Q1 21 aided by the benefits of its technology transformation.

More positively, DLG's product risk is considered low as a result of this preponderance of personal lines. Although the business is exposed to large bodily injury claims volatility, windstorm and flood catastrophe risk, DLG purchases significant reinsurance cover.

Asset quality: Relatively conservative investment portfolio, notwithstanding relatively high exposure to credit versus peers

We view DLG's asset quality as good. The Group has a relatively conservative investment portfolio, with c.92% held in fixed income securities and cash. In recent years, the Group has undertaken some re-risking actions, reflected in the rise in DLG's HRA as a percentage of shareholders' equity ratio to around 22% as of YE20 from 8% as of year-end 2013. DLG continues to have no exposure to equities, with HRA primarily comprising property investments and high yield bonds. Since 2014, DLG also has had an exposure to UK infrastructure, which supports the asset strategy backing periodical payment order liabilities.

As at YE20, DLG's invested assets comprised 69% fixed income securities, 19% cash and cash equivalents, 5% property investments, 4% infrastructure debt, and 3% commercial real estate loans with an average duration of total debt securities of 2.8 years. DLG has also repositioned its credit portfolio. Corporate bonds represented c.72% of invested assets as at YE20, which is significantly higher than a number of its UK/European P&C peers reflecting in part the consequences of not investing in equities. However, the credit quality of the fixed income portfolio is good, with at YE20 around 57% fixed income assets rated A or higher, albeit reduced from 61% at YE19, with a well-diversified portfolio by sector. However, in recent years DLG has increased its exposure to high-yield credit, which as at YE20, amounted to around 6% (YE19: c.7%) of invested assets, in line with the Group's target. Over the next 12-18 months, we expect only modest tweaks to the Group's investments as the Group continues to shift its portfolio towards its targets.

DLG's overall asset quality also benefits from a relatively low level of reported goodwill and intangible assets (including Deferred Acquisition Costs) as % of equity although this metric increased again to c.32% as of YE20 (YE19: c.30%) as the Group continued to invest in the business. Reinsurance recoverables have historically been low, and decreased to c.39% at YE20 (YE19: c.43%), in line with the typical 30%-40% historically.

Capital adequacy: Good capitalisation notwithstanding dividend pay-outs

DLG's capital adequacy is good. At YE20, DLG's regulatory solvency ratio increased to 191%, after the proposed final dividend and £100 million share buyback (YE19: 165% or 189% if adjusted to remove the cancelled 2019 final dividend and £120 million of share buyback). However, the YE20 ratio reduces to 172% if the Tier 2 debt (nominal value of £250 million) with a first call date during the first half of 2022 is excluded, and to 166% considering the impact of the Group's acquisition of its Bromley site in February 2021. The increase in the YE20 solvency ratio was driven by significant operating capital generation and the issuance of £260 million of Tier 2 debt outweighing the negative impact of dividends/share buybacks and capital expenditure.

Over time, we expect the Group's solvency ratio to converge towards the middle of its target range of 140%-180%. The Group has a general strategy of returning excess capital to shareholders via special dividends or, going forward, share buybacks, which will negatively impact shareholders' equity, but we expect DLG's Solvency II ratio to remain robust.

With regard to capital sensitivities, the Group has disclosed that its greatest exposures are a change in reserving basis for motor Periodic Payment Orders (PPOs) to use a real discount rate of -1% and a 100bp increase in credit spreads, which would reduce the Solvency II ratio by 10 and 9 ppts respectively as at YE20. A large catastrophe loss, equivalent to the 1990 storm, would also have

a meaningful impact of 8 ppt. Given the Group's relatively conservative investment portfolio and lack of equities exposure, DLG's Solvency II ratio is relatively insensitive to market movements aside from those related to credit spread.

Gross underwriting leverage has gradually declined over the years standing at 2.3x at YE20 (YE19: 2.4x) driven by lower reserves.

Profitability: Profitability targets exceeded for year-end 2020, but the highly competitive, regulated and dynamic UK personal market are a challenge

In 2020, the Group achieved a return on tangible equity (RoTE) of 19.9%, a combined ratio (COR) of 91.0% (below the Group's ongoing 93%-95% target range), and a 2.1% investment yield. This good set of results benefited from a strong underwriting profit notwithstanding reductions in prior year reserve releases and investment return which has come under more pressure with the fall in interest rates over the years. With regard to our scorecard metrics, DLG's five-year average ROC remained strong at YE20 although reduced to 11.1% (YE19: 12.5%), and the Sharpe ratio of ROC improved to 550% (YE19: 422%).

In 2020, the Group's operating profit fell by 4.5% to £522 million mainly due to increased weather costs, and overall, the impact of the coronavirus was a modest net benefit to the result. Normalised for weather, the Group's COR was 91.7% and benefited from the lower claims frequency in Motor.

We expect DLG's performance to continue to benefit from its disciplined approach to underwriting and claims management, its pricing capabilities supported by its strong brand differentiation, ongoing cost reduction initiatives and revenue growth thereby enabling it to continue to meet its 15% return on tangible equity and underwriting targets. This is notwithstanding the UK motor market remains extremely competitive, which makes it more difficult for price increases to match claims inflation, and we view the FCA's pricing measures as negative for motor and especially home insurers. To cap renewal prices by tying them to the equivalent new business price means that insurers will not be able to increase prices for renewal customers without also increasing the prices they offer the new business customers. However, we believe their scope to do this is limited by the inherently competitive nature of UK personal lines insurance.

More specifically to DLG, the Group aims to grow the current year contribution to operating profits to more than 50% by YE21 to offset the decline in recent years in motor prior year reserve releases and faces some execution risk in the continued roll out of its new technology systems in order to gain efficiency, capability, and flexibility improvements.

Reserve adequacy: Reserve releases trending down but to remain a feature, notwithstanding the inherent challenge of motor bodily injury claims

DLG has reported significant prior-year reserve releases since 2011, as reflected in the five-year weighted-average favourable loss development as a percentage of opening reserves, of 9.7% (2020-2016). These reserve releases were driven mainly by the Group's motor division in relation to favourable developments in bodily injury claims.

Given the Group's prudent reserving approach of current accident years, we expect reserve releases to remain a material contributor to future operating profit. However, as expected releases have been trending downward driven predominantly by increasing levels of reinsurance purchased by the Group. Also, motor claims inflation, for which the Group has a 3%-5% long-term range, remains an inherent reserving risk for the market. Motor claims inflation is driven by the rising cost of damages from repair costs because vehicles are fitted with more advanced technology, used car prices and credit hire costs. During 2017, there was also a rise in home claims inflation related to the escape of water, although DLG has taken a number of significant actions across pricing, underwriting and claims management to mitigate escape of water inflation henceforth.

Furthermore, some volatility will likely remain a feature particularly within the UK motor portfolio. We will continue to monitor changes in PPO propensities and large bodily injury claims although in this regard DLG has excess of loss reinsurance protection above a £1 million retention.

In 2018 and 2019, reserve releases were £404 million and £295 million respectively, and prior year releases in Motor have trended downwards. 2018 benefited from a £51 million amount as a result of DLG assuming a higher Ogden discount rate of 0%. In contrast, at YE19, there was a reserve increase of £17 million as a result of the movement of the Ogden discount rate to -0.25%. In 2020, overall releases reduced as expected to £174 million.

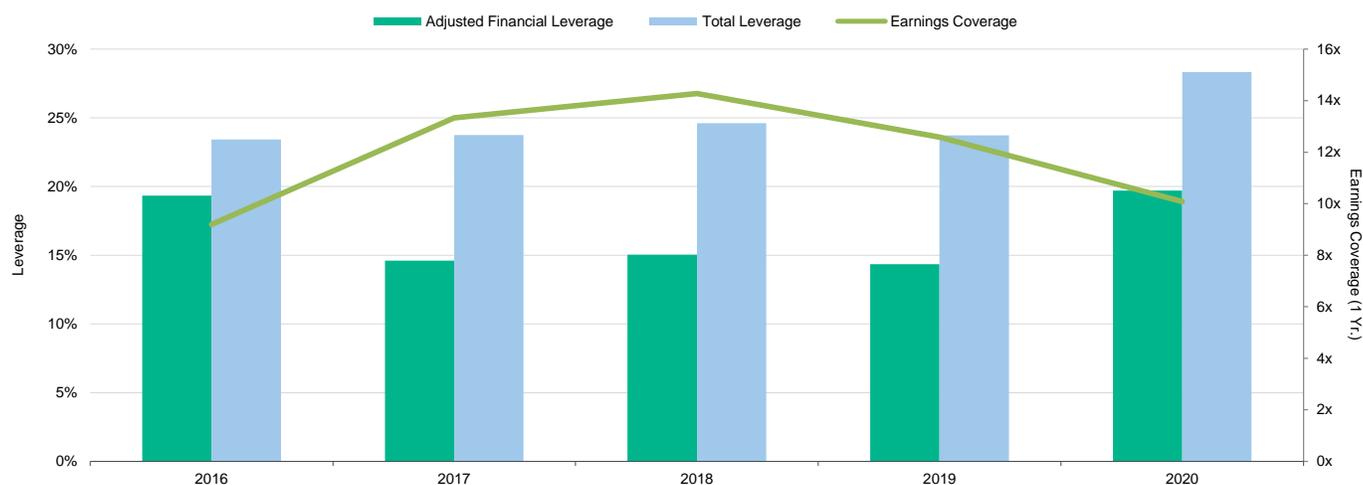
Financial flexibility: Leverage increased in 2020 but expected to remain relatively low, and strong earnings coverage

We view DLG's overall financial flexibility as very good. Adjusted financial leverage increased to c.20% at YE20 (YE19: c.14%), although remained relatively low, driven by the issuance of £260 million of dated subordinated Tier 2 notes in June 2020. Other debt securities issued by the Group include £259 million of dated subordinated notes and £347 million of restricted tier 1 securities which qualify for equity credit from us, with the Group's borrowings also including bank overdrafts and an operating lease liability. However, although leverage will likely be pressured by the Group's dividend policy, we expect it to benefit from the Group's acquisition in February 2021 of the lease of its Bromley office, and to remain relatively low in relation to the A1 IFSR.

Earnings coverage is strong, averaging around 12x over the past five years at YE20.

Exhibit 4

Financial Flexibility



Source: Company reports, Moody's Investors Service

As a result of its historic ownership, DLG has a more limited record in accessing capital markets versus some of the largest European insurers. However, we regard the restricted Tier 1 issuance in December 2017 and the IPO, following the lower Tier 2 debt issuance in April 2012, together with the debt issuance in June 2020 as evidence that DLG can successfully access the capital markets.

Structural considerations

The subordinated notes issued by DLG in June 2020 are rated Baa1(hyb). The rating is derived from the A1 IFSR of UKI and the three notch differential reflects Moody's standard notching practices for an insurance holding company domiciled and operating in jurisdictions where group regulation is in effect, and also reflects the structural and contractual subordination of the notes.

The guaranteed subordinated notes issued by DLG in April 2012 are rated A3(hyb). The rating reflects the fact that the notes are unconditionally and irrevocably guaranteed by UKI on a subordinated basis and reflect standard notching (versus the senior rating) for subordinated debt that lacks a mandatory trigger we consider to be "meaningful".

Environmental, social and governance considerations

Environmental

Like its P&C insurance peers, DLG is exposed to the economic consequences of climate change, primarily through the unpredictable effect of climate change on the frequency and severity of weather-related catastrophic events, such as floods and storms. However, in the ordinary course of its business, the Group undertakes a number of steps to manage these risk exposures, including the purchase of significant reinsurance cover and the regular reassessment of external catastrophe models to ensure they fully capture climate-related risk.

Furthermore, DLG is focusing increasingly on climate change, with related risk management activity and has published its first Task Force on Climate-related Financial Disclosures ("TCFD") Report which provides the Group with a roadmap to strengthen its strategic response in tackling climate change.

Social

Like its P&C peers, DLG's social risks arise primarily from underwritten exposures to liability claims against individuals and small businesses.

Governance

Like all other corporate credits, the credit quality of DLG is influenced by a wide range of governance-related issues, relating to financial, managerial, ownership or other factors, all of which can be exacerbated by regulatory oversight and intervention.

While a number of DLG's risk exposures are complex, the Group has a comprehensive risk management framework in place that mitigates various governance risks. Furthermore, DLG operates within a strong regulatory environment, being overseen by the UK's PRA, FCA and other regulatory and industry bodies.

Rating methodology and scorecard factors

Exhibit 5

Direct Line Insurance Group plc

Financial Strength Rating Scorecard [1][2]	Aaa	Aa	A	Baa	Ba	B	Caa	ScoreAdj	Score
Business Profile								A	A
Market Position, Brand and Distribution (25%)								A	Aa
-Relative Market Share Ratio			X						
-Underwriting Expenses % Net Premiums Written				30.3%					
Product Focus and Diversification (10%)								A	Baa
-Product Risk		X							
-P&C Insurance Product Diversification			X						
-Geographic Diversification						X			
Financial Profile								Aa	A
Asset Quality (10%)								Aa	A
-High Risk Assets % Shareholders' Equity	21.9%								
-Reinsurance Recoverable % Shareholders' Equity		39.0%							
-Goodwill & Intangibles % Shareholders' Equity			31.7%						
Capital Adequacy (15%)								Aa	A
-Gross Underwriting Leverage		2.3x							
Profitability (15%)								Aa	A
-Return on Capital (5 yr. avg.)			11.1%						
-Sharpe Ratio of ROC (5 yr.)	549.5%								
Reserve Adequacy (10%)								Aaa	Aa
-Adv. (Fav.) Loss Dev. % Beg. Reserves (5 yr. wtd. avg.)	-9.7%								
Financial Flexibility (15%)								Aa	A
-Adjusted Financial Leverage		19.7%							
-Total Leverage		28.3%							
-Earnings Coverage (5 yr. avg.)		11.9x							
-Cash Flow Coverage (5 yr. avg.)									
Operating Environment								Aaa - A	Aaa - A
Preliminary Standalone Outcome								Aa3	A1

[1] Information based on IFRS financial statements as of fiscal year ended 12/31/2020. [2] The Scorecard rating is an important component of the company's published rating, reflecting the standalone financial strength before other considerations (discussed above) are incorporated into the analysis.

Source: Moody's Investors Service

Ratings

Exhibit 6

Category	Moody's Rating
DIRECT LINE INSURANCE GROUP PLC	
Rating Outlook	STA
Subordinate	Baa1 (hyb)
BACKED Subordinate	A3 (hyb)
U K INSURANCE LIMITED	
Rating Outlook	STA
Insurance Financial Strength	A1

Source: Moody's Investors Service

Moody's related research

Rating actions

- » [Moody's assigns Baa1\(hyb\) rating to Direct Line's dated subordinated notes \(May 29, 2020\)](#)
- » [Moody's upgrades Direct Line's IFSR to A1; stable outlook \(May 10, 2019\)](#)

Sector comments:

- » [UK regulator limits non-life insurers' scope to raise prices, a credit negative](#)
- » [Business interruption ruling credit negative for \(re\)insurers, but impact manageable](#)
- » [Claims inflation and tough competition will counter UK motor insurers' Q4 price gain](#)

Outlook:

- » [P&C Insurance - Global](#)
- » [UK P&C Insurance - 2021 Outlook - Stable Outlook for UK P&C insurance](#)

To access any of these reports, click on the entry above. Note that these references are current as of the date of publication of this report and that more recent reports may be available. All research may not be available to all clients.

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