



**EXAMINATION REPORT
OF**

**Employers Preferred Insurance Company
Maitland, Florida**

NAIC Company Code: 10346

**as of
December 31, 2022**

**By
The Florida Office of Insurance Regulation**

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November 17, 2023

Michael Yaworsky
Commissioner
Office of Insurance Regulation
State of Florida
Tallahassee, Florida 32399-0326

Dear Commissioner:

Pursuant to your instructions, in compliance with Section 624.316, Florida Statutes, Rule 69O-138.005, Florida Administrative Code, and in accordance with the practices and procedures promulgated by the National Association of Insurance Commissioners (“the NAIC”), we have conducted an examination as of December 31, 2022, of the financial condition and corporate affairs of

Employers Preferred Insurance Company

851 Trafalgar Court, Suite 155W

Maitland, Florida 32751

hereinafter referred to as “the Company.” Such report of examination is herewith respectfully submitted.

SCOPE OF EXAMINATION

This examination covered the period of January 1, 2019 through December 31, 2022 and the fieldwork commenced with planning with the Florida Office of Insurance Regulation (“the Office”) on April 27, 2023. The fieldwork concluded as of November 17, 2023. The Company’s last full scope exam by representatives of the Office covered the period of January 1, 2015 through December 31, 2018.

The examination was conducted in accordance with the NAIC Financial Condition Examiners Handbook (“the Handbook”). The Handbook requires that the examination be planned and performed to evaluate the financial condition, assess corporate governance, identify current and prospective risks of the Company, and evaluate system controls and procedures used to mitigate those risks. An examination also includes identifying and evaluating significant risks that could cause an insurer’s surplus to be materially misstated both currently and prospectively.

The examination was a multi-state/coordinated process. The lead state for this exam was California and states that participated in this exam are as follows: Florida, Nevada, and New York. The Company has business or licenses in multiple states.

All accounts and activities of the Company were considered in accordance with the risk-focused examination process. This may include assessing significant estimates made by management and evaluating management’s compliance with the NAIC Statements of Statutory Accounting Principles (“SSAP”).

This examination report includes information obtained from the examination of the records, accounts, files, and documents of or relative to the Company and other information as permitted by Section 624.319, Florida Statutes. There may be other items identified during the examination that, due to their nature (for example, subjective conclusions or proprietary information), are not included within the examination report but separately communicated to other regulators and/or the Company.

SUMMARY OF SIGNIFICANT FINDINGS

Current Examination Findings

There were no significant findings as a result of this examination.

Previous Examination Findings

There were no significant findings in the previous examination.

COMPANY HISTORY

General

The Company was incorporated in Florida on January 1, 1982, and commenced business in Florida as a self-insurers fund, operating under the name of Florida Air Conditioning Contractors Association Self-Insurers Fund. On April 7, 1995 the Company incorporated and changed its name to Pinnacle Assurance Corporation, an Assessable Mutual. On August 21, 1995, the Company entered into a Plan of Conversion and Recapitalization wherein it converted from an assessable mutual to a stock property and casualty insurance company, wholly-owned by Florida Administrators, Inc., which later became AmCOMP Incorporated ("AmCOMP, Inc."). On January 26, 1996, the Company changed its name to Pinnacle Assurance Corporation.

On October 31, 1997, the Company acquired Thomas Jefferson Insurance Company, a property and casualty insurance company, which was domiciled in Florida and licensed in 21 states. Following the acquisition, Thomas Jefferson Insurance Company's name was changed to AmCOMP Assurance Corporation. The Company owned 100 percent of the outstanding stock of AmCOMP Assurance Corporation. On January 21, 1998, the Company changed its name to AmCOMP Preferred Insurance Company.

On October 31, 2008, Employers Holdings, Inc. ("EHI") acquired 100 percent of the outstanding common stock of AmCOMP, Inc. and all its subsidiaries, including the Company and its subsidiary, AmCOMP Assurance Corporation. EHI's subsidiary Employers Group, Inc. ("EGI")

merged with AmCOMP, Inc. on December 31, 2008 leaving EGI the surviving entity. The acquisition was funded by EHI using cash, extraordinary dividends from the operating companies, and a short-term credit facility. On December 16, 2008, the Office approved the name change of the Company and its subsidiary from AmCOMP Preferred Insurance Company and AmCOMP Assurance Corporation to Employers Preferred Insurance Company and Employers Assurance Company (“EAC”), respectively. The ultimate controlling person of both insurers is EHI.

Dividends

The Company declared and paid dividends to its stockholder in 2022, 2021 and 2020 in the amounts of \$24,000,000, \$22,900,000 and \$21,700,000, respectively.

Capital Stock and Capital Contributions

As of December 31, 2022, the Company’s capitalization was as follows:

Number of authorized common capital shares	10,000,000
Number of shares issued and outstanding	25,000
Total common capital stock	\$2,500,000
Par value per share	\$100.00

In 2020, EGI contributed additional paid-in surplus of \$375,000 per the request of the Commonwealth of Pennsylvania to keep the Company’s license valid.

The Company is a member of the Federal Home Loan Bank of San Francisco (“FHLB”). On March 9, 2018, the Company entered into a standby Letter of Credit Reimbursement Agreement (“Letter of Credit Agreement”) with the FHLB in the amount of \$50,000,000. On January 26, 2021, the Company amended its existing Letter of Credit Agreement to decrease its respective letter of credit amount. The current Company’s Letter of Credit Agreement, as amended, is in the amount of \$10,000,000. The Letter of Credit Agreement may only be used to satisfy, in whole or in part, insurance deposit requirements with the State of California and are fully secured with eligible collateral at all times. As of December 31, 2022, the Company’s actual maximum borrowing capacity is at \$116,100,000, including the \$10,000,000 Letter of Credit Agreement.

During 2022, the Company received advances under the FHLB Standard Credit Program totaling \$87,800,000, all of which remained outstanding at December 31, 2022. The proceeds from this advance were used to purchase an equivalent amount of high-quality collateralized loan obligation securities. This advance can be repaid at any time without penalty and is collateralized by eligible investment securities.

Surplus Notes

On April 30, 2004, the Company issued a \$10 million surplus note to Dekania CDO II, Ltd. in return for \$10 million in cash. With the approval of the Office, the surplus note, including the final interest payment, was repaid on May 14, 2019.

On September 14, 2004, the Company issued a \$10 million surplus note to Alesco Preferred Funding V, LTD., in return for \$10 million in cash. With the approval of the Office, the surplus note, including the final interest payment was repaid on June 14, 2019.

There are no other outstanding surplus notes as of December 31, 2022.

Acquisitions, Mergers, Disposals, Dissolutions

The Company had no acquisitions, mergers, disposals, or dissolutions during the period under examination.

MANAGEMENT AND CONTROL

Corporate Governance

The annual shareholder meeting for the election of Directors was held in accordance with Section 628.231, Florida Statutes. Directors serving on December 31, 2022, are shown below:

Directors		
Name	City, State	Principal Occupation, Company Name
Michael J. McSally ^(a)	Portsmouth, New Hampshire	Independent Chairman and Director Retired/Private Investor
Katherine H. Antonello	Reno, Nevada	President and Chief Executive Officer, Employers Holdings, Inc.
Michael S. Paquette	Reno, Nevada	Executive Vice President, Chief Financial Officer and Treasurer Employers Holdings, Inc.
Lori A. Brown	Reno, Nevada	Executive Vice President, Chief Legal Officer, General Counsel and Secretary Employers Holdings, Inc.
Christopher W. Laws	Reno, Nevada	Executive Vice President, Chief Actuary Employers Holdings, Inc.

(a) Chairperson

In accordance with the Company's Bylaws, the Board appointed the following Senior Officers:

Senior Officers		
Name	City, State	Title
Katherine H. Antonello	Reno, Nevada	President, Chief Executive Officer
Michael S. Paquette	Reno, Nevada	Treasurer
Lori A. Brown	Reno, Nevada	Secretary
Christopher W. Laws	Reno, Nevada	Executive Vice President, Chief Actuary
Matthew H. Hendricksen	Reno, Nevada	Senior Vice President, Treasury & Investments
Christina M. Ozuna	Henderson, Nevada	Senior Vice President, Chief Claims Officer
Ann Marie Smith	Remote - Florida	Senior Vice President, Chief Underwriting Officer
George (Chip) Carbonar	Reno, Nevada	Vice President, Corporate Controller
Ken Kauffman	Reno, Nevada	Vice President, Tax

EHI's Board appointed several internal committees that are responsible for governing the Company. The following were the principal EHI internal board committees and their members on December 31, 2022. The first person listed for each committee is the chair.

Executive Committee		
Michael J. McSally	Katherine H. Antonello	John M. de Figueiredo
Valerie R. Glenn	Barbara A. Higgins	Michael J. McColgan
Jeanne L. Mockard		

The Company maintained an audit committee, as required by Section 624.424(8)(c), Florida Statutes.

Audit Committee		
Michael J. McColgan	James R. Kroner	Jeanne L. Mockard

Finance Committee		
Jeanne L. Mockard	Katherine H. Antonello	James R. Kroner
Alex Perez - Tenessa		

Board Governance and Nominating Committee		
Valerie R. Glenn	John M. de Figueiredo	Barbara A. Higgins

Human Capital Management and Compensation Committee		
Barbara A. Higgins	Prasanna G. Dhoré	Valerie R. Glenn
Michael J. McSally		

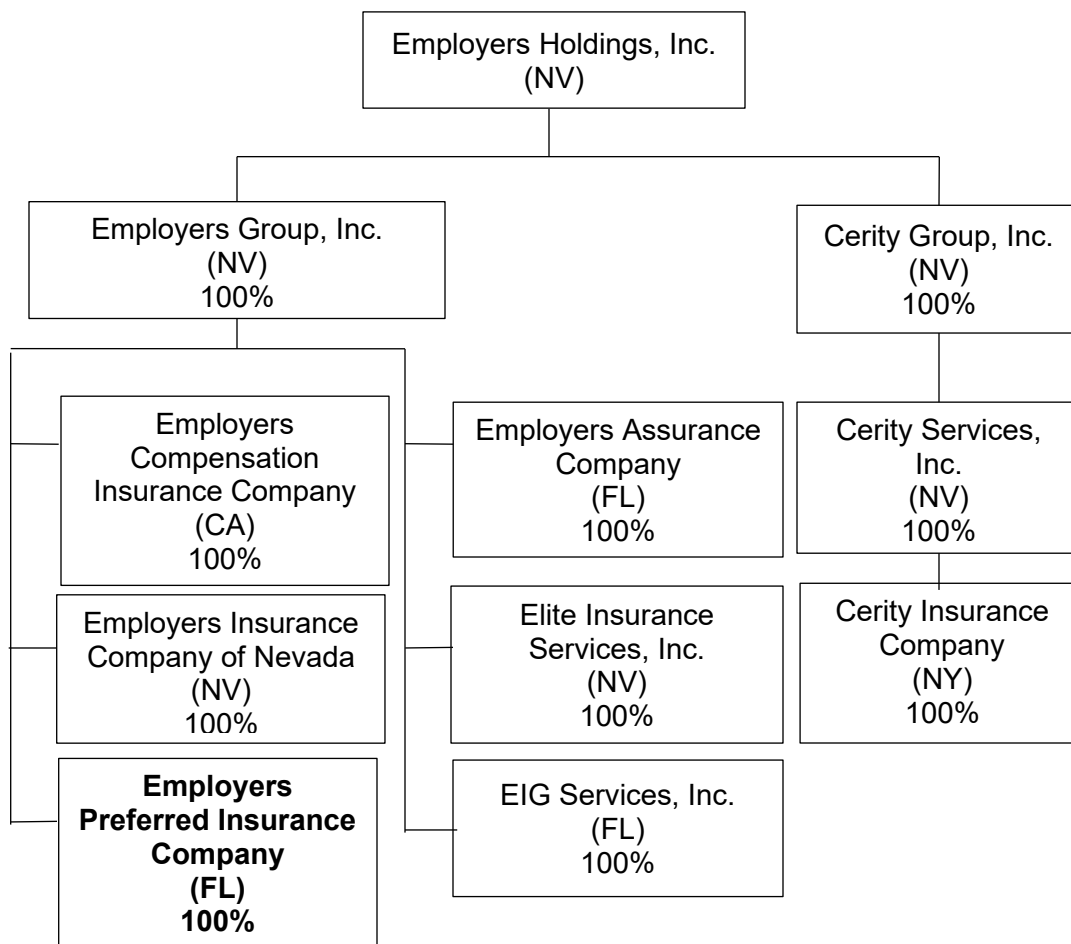
Risk Management Technology and Innovation Committee		
John M. de Figueiredo	Katherine H. Antonello	Prasanna G. Dhoré
Michael J. McColgan	Alex Perez - Tenessa	

Holding Company System

The last holding company registration statement was filed with the State of Florida on March 30, 2023, as required by Section 628.801, Florida Statutes, and Rule 69O-143.046, Florida Administrative Code.

The organizational chart on December 31, 2022, reflecting the holding company system, is shown below. Schedule Y of the Company's 2022 annual statement provided a list of all related companies of the holding company group.

Employers Preferred Insurance Company Organizational Chart December 31, 2022



The following agreements were in effect between the Company and its affiliates:

Amended and Restated Administrative Services Agreement

Effective January 1, 2022, ultimate parent, EHI, and its subsidiaries entered into an Amended and Restated Administrative Services Agreement (“ARSA”) that superseded the previous agreements that were effective January 2016 and August 2019. Under the terms of the ARSA, the parties may furnish to each other various services such as: accounting, actuarial, tax, auditing, functional support services, claims, investment, underwriting, premium, reinsurance, information technology, legal and other services. As stipulated in the ARSA, the compensation for providing such services is based on actual cost.

Amended and Restated Tax Allocation Agreement

Effective September 30, 2019, the Company entered into an Amended and Restated Tax Allocation Agreement (“Tax Agreement”) with its ultimate parent, EHI and affiliates (“Group”) where EHI would file a consolidated federal income tax return on behalf of the Group. The Tax Agreement replaced the previous agreement that was effective January 1, 2016. Under the terms of the Tax Agreement, the consolidated federal tax liability is allocated to consolidating companies based on separate return calculations with credit given for any net operating losses or other items utilized in the consolidated tax return. Pursuant to this Tax Agreement, the Group has the enforceable right to recoup federal income taxes paid in prior years in the event of future net losses which they may incur, or to recoup its net losses carried forward as an offset to future net income subject to federal income taxes.

Network Carrier Agreement (EAC – EPIC)

Effective January 1, 2015, the Company entered into a Network Carrier Agreement (“NCA-EAC”) with EAC for business underwritten in the state of Texas. The NCA-EAC gives EAC access to the Company’s Texas workers’ compensation health care network. The NCA-EAC allows the Company to provide EAC services that include contracting with providers, credentialing, quality

improvement programs, case management, out-of-network referrals, and compliance reporting. Reimbursements under the NCA-EAC are based on actual costs. The Office issued a no-objection letter to the NCA on December 23, 2014. According to the Company, actual NCA-EAC expenses are paid with those related to the ARSA.

On April 23, 2015, the NCA-EAC was amended to include sections concerning EAC's ownership and control of the books and records of EAC in possession of the Company. The Office issued a no-objection letter to the Amended Network Carrier Agreement ("ANCA-EAC") on May 26, 2015. The effective date of the ANCA-EAC remained January 1, 2015.

Network Carrier Agreement (ECIC – EPIC)

Effective January 1, 2015, the Company entered into a Network Carrier Agreement ("NCA-ECIC") with California domiciled affiliate, Employers Compensation Insurance Company ("ECIC") for business underwritten in the state of Texas. The NCA-ECIC gives ECIC access to the Company's Texas workers' compensation health care network. The NCA-ECIC allows the Company to provide ECIC services that include contracting with providers, credentialing, quality improvement programs, case management, out-of-network referrals, and compliance reporting. Reimbursements under the NCA-ECIC are based on actual costs. The Office issued a no-objection letter to the ECIC-NCA on December 23, 2014. The California Department of Insurance ("CDI") issued a similar no-objection letter on March 25, 2015. According to the Company, actual NCA-ECIC expenses are paid with those related to the ARSA.

On April 22, 2015, the NCA-ECIC was amended to include sections concerning ECIC's ownership and control of the books and records of ECIC in possession of the Company. The Office issued a no-objection letter to the Amended Network Carrier Agreement ("ANCA-ECIC") on May 29, 2015, and by the CDI on May 21, 2015. The effective date of the ANCA-ECIC remained January 1, 2015.

General Agency and Underwriting Manager Agreement

Effective October 14, 2014, the Company entered into a General Agency and Underwriting Manager Agreement ("GAUMA") with its non-insurer affiliate, EIG Services, Inc. ("EIG Services"), and its insurer affiliates. Under the terms of the GAUMA, EIG Services is the appointed general agent and underwriting manager for each of the insurance companies. EIG Services further

agreed to solicit, underwrite, complete applications, quote premiums, bind, issue, and deliver insurance policies. The compensation to EIG Services for providing the services shall be based on actual cost without a profit factor built into the cost. Each party agrees that EIG Services shall not receive any commissions or profit sharing for any business transacted under the GAUMA.

Consent to Assignment of Lease

On July 29, 2011, the Company entered into a Consent to Assignment of Lease wherein the Company assigned to EIG Services all of its rights in and to a lease for office space located at Maitland, Florida. The landlord required as a condition of the assignment that the Company remains responsible for all obligations of EIG Services associated with the lease.

ACCOUNTS AND RECORDS

The Company receives approval from the Office, on an annual basis, to maintain its principal operational offices in Reno, Nevada.

TERRITORY AND PLAN OF OPERATIONS

The Company was authorized to transact insurance in the following states:

Alabama	Kentucky	Oklahoma
Alaska	Louisiana	Oregon
Arizona	Maine	Pennsylvania
Arkansas	Maryland	Rhode Island
California	Massachusetts	South Carolina
Colorado	Michigan	South Dakota
Connecticut	Minnesota	Tennessee
Delaware	Mississippi	Texas
District of Columbia	Missouri	Utah
Florida	Montana	Vermont
Georgia	Nebraska	Virginia

Hawaii	Nevada	West Virginia
Idaho	New Hampshire	Wisconsin
Illinois	New Jersey	
Indiana	New Mexico	
Iowa	New York	
Kansas	North Carolina	

The Company was authorized to transact insurance in Florida on January 1, 1982, and is currently authorized to write the Workers' Compensation line of business in Florida as of December 31, 2022:

The Company primarily writes Workers' Compensation policies in California, Florida, Georgia, Illinois, and New Jersey.

REINSURANCE

The reinsurance agreements reviewed complied with NAIC standards with respect to the standard insolvency clause, arbitration clause, intermediary clause, transfer of risk, reporting, and settlement information deadlines.

Intercompany Pooling Agreement

The Company and some of its affiliates have entered into different versions of a reinsurance pooling agreement over the years. In each instance, the participants ceded the gross incurred premiums, losses, and expenses, less any amount already covered by outside reinsurance treaties, to the lead insurer ("the Lead"). The Lead then retained its portion and allocated the remaining incurred premiums, losses, and expenses back to the participants. The contract versions, lead insurer, participating insurers, and percentage of participation is shown below:

Contract Version	Contract Description	Effective Date	Lead Insurer	Participating Insurers	Respective Participating Insurers Percentages
Original	Intercompany Pooling Arrangement	10/1/08	EICN	ECIC, EAC, EPIC	53%, 27%, 10%, 10%
2	Amended and Restated	1/1/15	EPIC	ECIC, EICN, EAC	35%, 35%, 18%, 12%

	Reinsurance Pooling Agreement				
3	Amended and Restated Reinsurance Pooling Agreement	1/1/18	EPIC	EAC, ECIC, EICN	40%, 30%, 20%, 10%
4	Amended and Restated Reinsurance Pooling Agreement	8/1/19	EPIC	EAC, ECIC, EICN, CIC	40%, 30%, 20%, 5%, 5%
5	First Amendment To The Amended And Restated Reinsurance Pooling Agreement	1/1/22	EPIC	EAC, ECIC, EICN, CIC	40%, 30%, 20%, 5%, 5%

Reinsurance Assumed

The Company participates in mandatory workers' compensation reinsurance pools. The Company assumed a total of \$5,404,000 in premium. \$5,249,000 of that was from the National Workers Compensation Reinsurance Pool with the balance of \$155,000 coming from a small number of state pools.

The Company continues to assume and administer losses from Arrowood Indemnity Company, which is in run-off. The Company reported \$121,000 in assumed known case Losses and LAE as of December 31, 2022.

Reinsurance Ceded

The Company participates in a Workers' Compensation Excess of Loss Reinsurance Contract with its affiliates, ECIC, EICN, EAC and CIC. Excess of loss reinsurance provides \$200,000,000 excess of \$10,000,000 coverage for all businesses classified by the Company as workers' compensation and employers' liability. The reinsurance program includes coverage for earthquake and terrorism losses excluding nuclear, chemical, biological, or radiological events. The following is a summary of the Company's reinsurance agreements in-force as of December 31, 2022:

Line of Business and Type of Contract	Reinsurer's Name	Company's Retention	Reinsurer's Limit
First Layer	4 domestic, foreign, and alien companies lead by Hannover Ruck SE and Partner Reinsurance Company of U.S.	\$10 million	\$10 million excess \$10 million \$20 million maximum any one life One reinstatement excluding Terrorism
Second Layer	5 domestic, foreign, and alien companies	\$30 million	\$30 million excess \$20 million \$20 million maximum any one life One reinstatement excluding Terrorism
Third Layer	6 domestic, foreign, and alien companies	\$50 million	\$50 million excess \$50 million \$20 million maximum any one life One reinstatement excluding Terrorism
Fourth Layer	6 domestic, foreign, and alien companies	\$100 million	\$100 million excess \$100 million \$20 million maximum any one life One reinstatement excluding Terrorism

FINANCIAL STATEMENTS

The following includes the Company's statutory Statement of Assets, Liabilities, Surplus and Other Funds; statutory Statement of Income; and the statutory Analysis of Changes in Surplus for the year ended December 31, 2022. The financial statements are based on the statutory financial statements filed by the Company with the Office and present the financial condition of the Company for the period ending December 31, 2022. (Note: Failure of the columns to add to the totals reflected in this Report is due to rounding.)

Employers Preferred Insurance Company
Assets
December 31, 2022

	Assets	Nonadmitted Assets	Net Admitted Assets
Bonds	\$ 865,106,616	\$ 0	\$ 865,106,616
Stocks			
Common stocks	24,056,303	0	24,056,303
Cash, cash equivalents and short-term investments	50,599,494	0	50,599,494
Other invested assets	14,841,612	0	14,841,612
Receivables for securities	1,369,497	0	1,369,497
Subtotals, cash and invested assets	955,973,521	0	955,973,521
Investment income due and accrued	6,047,732	0	6,047,732
Premiums and considerations			
Uncollected premiums and agents' balances	38,733,713	10,390,056	28,343,657
Deferred premiums, agents' balances and installments	159,005,143	11,690,871	147,314,272
Reinsurance			
Amounts recoverable from reinsurers	18,175,047	0	18,175,047
Net deferred tax asset	22,837,648	5,297,402	17,540,246
Guaranty funds receivable or on deposit	81,987	0	81,987
Receivable from parent, subsidiaries and affiliates	1,443,870	0	1,443,870
Aggregate write-in for other than invested assets	\$2,035,037	\$100,217	\$1,934,820
Total	<u>\$1,204,333,698</u>	<u>\$27,478,546</u>	<u>\$1,176,855,152</u>

Employers Preferred Insurance Company
Liabilities, Surplus and Other Funds
December 31, 2022

	Per Company
Losses	\$ 508,089,413
Reinsurance payable on paid losses and loss adjustment expenses	2,514,128
Loss adjustment expenses	98,005,989
Commissions payable, contingent commissions and other similar charges	32,939,328
Other expenses	951,822
Taxes, licenses and fees	12,138,409
Current federal and foreign income taxes	149,282
Borrowed money and interest thereon	87,800,000
Unearned premiums	123,957,406
Advance premiums	20,117,983
Dividends declared and unpaid	
Policyholders	792,176
Ceded reinsurance premiums payable	36,308,118
Remittances and items not allocated	1,252,672
Payable to parent, subsidiaries and affiliates	11,571,192
Payable for securities	2,194,753
Aggregate write-in for liabilities	8,406,582
Total liabilities	\$947,189,253
Common capital stock	2,500,000
Gross paid-in and contributed surplus	375,000
Unassigned funds (surplus)	226,790,899
Surplus as regards policyholders	229,665,899
Totals	<u>\$1,176,855,152</u>

Employers Preferred Insurance Company
Statement of Income
December 31, 2022

	Per Company
Underwriting Income	\$270,092,521
Premiums earned	
Deductions	
Losses Incurred	\$124,368,095
Loss adjustment expenses incurred	35,375,536
Other underwriting expenses incurred	102,598,555
Total Underwriting deductions	\$262,342,186
Net underwriting gain (loss)	\$7,750,335
Investment Income	
Net investment income earned	\$31,063,647
Net realized capital gains or (losses)	(4,116,801)
Net investment gain or (loss)	\$26,946,846
Other Income	
Net gain or (loss) from agents' or premium balances charged off	\$(2,567,379)
Finance and service charges not included in premiums	738,308
Aggregate write-ins for miscellaneous income	(1,726,910)
Total other income	\$(3,555,981)
Net income before dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes	\$31,141,200
Dividends to policyholders	3,715,235
Net income, after dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes	\$27,425,965
Federal & foreign income taxes incurred	4,457,361
Net Income	\$22,968,604
Capital and Surplus Account	
Surplus as regards policyholders, December 31 prior year	\$240,487,620
Net Income	22,968,604
Change in net unrealized capital gains or losses less capital gains tax	(3,857,985)
Change in net deferred income taxes	1,878,091
Change in non-admitted assets	(7,810,431)
Dividends to stockholders	(24,000,000)
Change in surplus as regards policyholders for the year	(10,821,721)
Surplus as regards policyholders, December 31, current year	<u>\$229,665,899</u>

**Employers Preferred Insurance Company
Reconciliation of Capital and Surplus
December 31, 2022**

No adjustments were made to surplus as regards policyholders as a result of this examination.

Capital/Surplus Change during Examination Period			
			\$190,052,548
Surplus at December 31, 2018, per Company			
	Increase	Decrease	
Net Income (loss)	\$135,625,056		
Change in net unrealized capital gain (loss)		1,260,757	
Change in net deferred income tax		1,665,438	
Change in non-admitted assets		4,901,700	
Change in provision for reinsurance	41,188		
Change in surplus notes		20,000,000	
Change in paid in capital	375,000		
Dividends to stockholders		\$68,600,000	
Rounding	2		
Net increase (or decrease)			\$ 39,613,351
Surplus at December 31, 2022 per Company			\$229,665,899

COMMENTS ON FINANCIAL STATEMENT ITEMS

Capital and Surplus

The amount of capital and surplus reported by the Company of \$229,665,899 exceeded the minimum of \$76,109,150 required by Section 624.408, Florida Statutes.

SUBSEQUENT EVENTS

On May 25, 2023, the Company's Board of Directors approved an ordinary dividend of \$22,900,000 to be paid to its parent company, EGI. The cash dividend was paid on July 14, 2023.

On July 12, 2023, John Hofer temporarily took over the Chief Information Officer's duties and responsibilities until Kelley Kage was hired as CIO effective October 30, 2023.

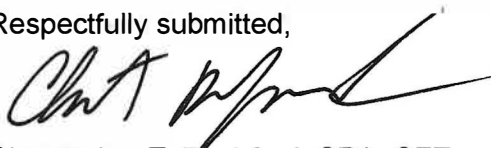
CONCLUSION

The insurance examination practices and procedures as promulgated by the NAIC have been followed in ascertaining the financial condition of Employers Preferred Insurance Company as of December 31, 2022, consistent with the insurance laws of the State of Florida.

In addition to the undersigned, the following individuals from the Office and Risk and Regulatory Consulting, LLC ("RRC") also participated in the examination:

James Wheeler, PIR	Examiner	The Office
Jan Moenck, CFE, CISA	Contractor Exam Manager	RRC
Hanna Roux, CPA	Contractor Examiner	RRC

Respectfully submitted,



Christopher T. Rushford, CPA, CFE
Director
Risk & Regulatory Consulting, LLC
Representing the Florida Office of Insurance Regulation



Chad Mason, PIR
Chief Financial Examiner
Property & Casualty Financial Oversight
Florida Office of Insurance Regulation