

DEPARTMENT OF COMMERCE & INSURANCE

P.O. Box 690, Jefferson City, Mo. 65102-0690

ORDER

After full consideration and review of the report of the financial examination of Safety Specialty Insurance Company for the period ended December 31, 2023, together with any written submissions or rebuttals and any relevant portions of the examiner's workpapers, I, Angela L. Nelson, Director of the Missouri Department of Commerce and Insurance pursuant to section 374.205.3(3)(a), RSMo, adopt such examination report. After my consideration and review of such report, workpapers, and written submissions or rebuttals, I hereby incorporate by reference and deem the following parts of such report to be my findings and conclusions to accompany this order pursuant to section 374.205.3(4), RSMo: summary of significant finding, company history, management and control, territory and plan of operation, growth of company and loss experience, reinsurance, accounts and records, financial statements, comments on financial statement items, financial statement changes resulting from examination, and summary of recommendations.

Based on such findings and conclusions, I hereby ORDER that the report of the financial examination of Safety Specialty Insurance Company as of December 31, 2023, be and is hereby ADOPTED as filed and for Safety Specialty Insurance Company to take the following action or actions, which I consider necessary to cure any violation of law, regulation or prior order of the Director revealed by such report: (1) account for its financial condition and affairs in a manner consistent with the Director's findings and conclusions.

So ordered, signed and official seal affixed this day of June, 2025.

Angela L. Nelson, Director

Department of Commerce and Insurance



REPORT OF FINANCIAL EXAMINATION OF

SAFETY SPECIALTY INSURANCE COMPANY

AS OF DECEMBER 31, 2023

STATE OF MISSOURI
DEPARTMENT OF COMMERCE & INSURANCE

JEFFERSON CITY, MISSOURI

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Honorable Angela L. Nelson, Director Missouri Department of Commerce and Insurance 301 West High Street, Room 530 Jefferson City, Missouri 65101

Director Nelson:

In accordance with your financial examination warrant, a full-scope financial examination has been made of the records, affairs, and financial condition of

Safety Specialty Insurance Company (NAIC #13815)

hereinafter referred to as such, as SSIC, or as the Company. Its administrative office is located at 1832 Schuetz Rd., St. Louis, MO 63146, telephone number (314) 692-1369. The fieldwork for this examination began on March 18, 2024, and concluded on the above date.

SCOPE OF EXAMINATION

Period Covered

The Missouri Department of Commerce and Insurance (Department) has performed a multi-state financial examination of Safety Specialty Insurance Company. The last examination of the Company by the Department covered the period of January 1, 2014, through December 31, 2018. The current examination covers the period of January 1, 2019, through December 31, 2023, as well as a review of any material transactions and events occurring subsequent to the examination period through the date of this report.

Procedures

We conducted our examination in accordance with the National Association of Insurance Commissioners (NAIC) *Financial Condition Examiners Handbook* (*Handbook*), except where practices, procedures, and applicable regulations of the Department or statutes of the state of Missouri prevailed. The *Handbook* requires that we plan and perform the examination 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 the identification and evaluation of significant risks that could cause the Company's surplus to be materially misstated, both on a current and prospective basis.

This examination also included a review of significant estimates made by management and evaluation of management's compliance with Statutory Accounting Principles. The examination does not attest to the fair presentation of the financial statements included herein. If, during the course of the examination an adjustment is identified, the impact of such adjustment will be documented separately following the Company's financial statements.

All accounts and activities of the Company were considered in accordance with the risk-focused examination process. Those activities considered in the examination as key to SSIC included Capital and Surplus, Investments, Reinsurance Assumed, Reinsurance Ceded, Related Parties, Underwriting, Reserves and Claims Handling. The examination also included a review and evaluation of information technology general controls.

This examination was conducted as part of a coordinated examination of the Safety National subgroup of Tokio Marine Holdings, Inc., which consists of three insurance companies domiciled in Missouri and Illinois. The Pennsylvania Department of Insurance is the lead state regulator for the group. The Missouri Department is the lead state for the Safety National subgroup. Along with Missouri, Illinois participated in the coordinated examination. The examination was also conducted concurrently with the examination of the Company's Missouri-domiciled affiliate, Safety National Casualty Corporation (SNCC).

This examination report includes significant findings of fact, as mentioned in Section 374.205 RSMo (Examination, director may conduct, when...) and general information about the Company and its financial condition. There may be other items identified during the examination that, due to their nature (e.g., subjective conclusions, proprietary information, etc.), are not included within the examination report but are separately communicated to other regulators and/or the Company.

SUMMARY OF SIGNIFICANT FINDINGS

There were no material adverse findings, significant non-compliance issues, or material changes to the financial statements noted during the examination.

COMPANY HISTORY

General

Prior to 2014, SSIC was known as SPARTA Specialty Insurance Company, a Connecticut-domiciled insurer owned by SPARTA Insurance Company. In 2014, after incurring heavy losses, the Company was put in run-off status. Later in 2014, SPARTA Insurance Company was acquired by Catalina Holdings Bermuda, Ltd., which became the ultimate controlling entity.

In April of 2015, SPARTA Insurance Company entered into a Stock Purchase Agreement with SNCC for the sale of SPARTA Specialty Insurance Company. The sale was completed in December 2015, at which time the Company became a wholly owned subsidiary of SNCC. In conjunction with the acquisition, the Company redomiciled from Connecticut to Missouri, changed its name to Safety Specialty Insurance Company and became licensed as a domestic surplus lines insurer under Chapter 384 RSMo (Surplus Lines Insurance Laws).

SSIC was a shell company at the time of acquisition with no existing operations, in-force policies or outstanding claims. The transaction was accounted for as a quasi-reorganization in accordance with SSAP No. 72 (Surplus and Quasi-Reorganizations), and SSIC's unassigned funds (surplus) balance was reset to \$0 upon completion of the purchase. Effective December 31, 2015, SNCC made a \$30 million capital contribution to SSIC to enhance SSIC's surplus and further its ability to write surplus lines insurance on a national basis.

Mergers, Acquisitions, and Major Corporate Events

No mergers, acquisitions or major corporate events occurred during the exam period.

Dividends and Capital Contributions

No capital contributions were received during the exam period. The Company paid the following dividends to its parent during the exam period:

Year	Amount
2022	\$ 37,810,030
2023	13,400,000
Total	\$ 51,210,030

Surplus Notes

The Company issued a \$8.6 million surplus note to Tokio Marine Kiln, Ltd (TMK) in exchange for cash on December 31, 2018. The interest rate for this note was 4%, and it had a maturity date of January 15, 2039. The Company paid off this surplus note and simultaneously issued a new \$12.6 million surplus note to TMK on December 31, 2019. The interest rate for the new note was 4% and it had a maturity date of January 15, 2040. The Company paid \$8.0 million of the principal balance to TMK on July 15, 2022. The remaining principal balance of \$4.6 million was paid on May 1, 2023. The Company paid TMK interest of \$1,796,199 on surplus notes during the exam period.

The Company issued a \$5.6 million surplus note to Tokio Marine & Nichido Fire Insurance Company (TMNF) in exchange for cash on March 2, 2021. The interest rate for this note was 3.6%, and it had a maturity date of March 2, 2041. The Company paid the entire principal balance of \$5.6 million of the principal balance to TMNF on May 15, 2023. The Company paid TMNF interest of \$450,240 on this note.

Issuance of the surplus notes and subsequent interest payments were properly requested by the Company and approved by the Department.

MANAGEMENT AND CONTROL

Board of Directors

The management of the Company is vested in a Board of Directors that are elected by the shareholder. The Company's Articles of Incorporation specify that there shall be no less than nine nor more than twenty-five members. The Board of Directors elected and serving as of December 31, 2023, were as follows:

Name and Address Principal Occupation and Business Affiliation

Gus E. Aivaliotis Chief Underwriting Officer

St. Louis, MO Safety National Casualty Corporation

Kimberly M. Barnett EVP - Chief Underwriting Officer of Treaty Reinsurance

Naples, FL Safety National Casualty Corporation

John P. Csik President

St. Louis, MO Safety National Casualty Corporation

Steven C. Divine Treasurer and Chief Financial Officer St. Louis, MO Safety National Casualty Corporation

Thomas V. Grove Chief Client Officer

St. Louis, MO Safety National Casualty Corporation

Duane A. Hercules Chief Executive Officer

St. Louis, MO Safety National Casualty Corporation

Nicholas A. Kriegel SVP of Operations, General Counsel and Secretary

St. Louis, MO Safety National Casualty Corporation

Cynthia A. Morton Chief Operating Officer and Chief Innovation Officer

St. Louis, MO Safety National Casualty Corporation

Mark A. Wilhelm Executive Chairman

St. Louis, MO Safety National Casualty Corporation

Senior Officers

The officers elected and serving, as of December 31, 2023, were as follows:

Name Office

Duane A. Hercules Chief Executive Officer

John P. Csik President Steven C. Divine Treasurer Nicholas A. Kriegel Secretary

Gus E. Aivaliotis Chief Underwriting Officer

Kimberly M. Barnett EVP – Chief Underwriting Officer of Treaty Reinsurance

Thomas V. Grove Chief Client Officer

Robert. E. Leitner SVP - Business Development

Cynthia A. Morton Chief Operating Officer and Chief Innovation Officer

Mitchell A. Neuhaus Senior Vice President - Claims

Curtis L. Reno Senior Vice President - Insurance Underwriting

Mark A. Wilhelm Executive Chairman

Principal Committees

The Bylaws grants the board of directors the power to maintain an Executive and Investment Committee and other committees.

Audit Committee

John P. Csik, Chair Duane A. Hercules Mark A. Wilhelm **Executive and Investment Committee**

John P. Csik, Chair Duane A. Hercules Mark A. Wilhelm

Corporate Records

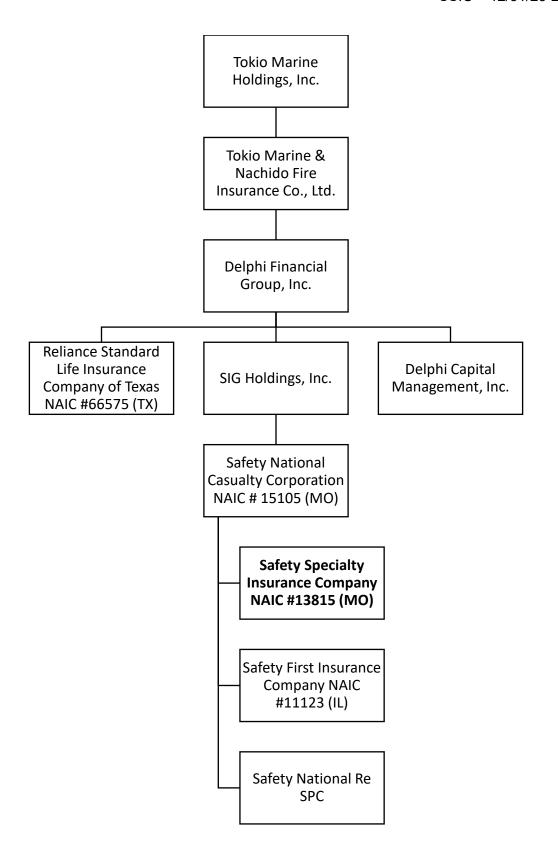
The Company's Articles of Incorporation (Articles) and Bylaws were reviewed. There were no changes to the Articles or Bylaws during the examination period. The minutes of the Board of Directors, committees and shareholder were reviewed for the period under examination.

Holding Company, Subsidiaries, and Affiliates

SSIC is a member of an Insurance Holding Company System, as defined by Section 382.010 RSMo (Definitions). Tokio Marine Holdings, Inc. (TMHI) is the ultimate controlling entity within the holding company system. TMHI directly or indirectly owns five life and twenty-five property and casualty insurance companies in the United States and numerous alien insurers.

Organizational Chart

The following organizational chart depicts the applicable portion of the holding company group as of December 31, 2023. All subsidiaries shown are wholly owned unless otherwise noted.



Intercompany Transactions

The following agreements represent significant contracts executed with affiliated entities that were in effect as of December 31, 2023. A brief description of these agreements is as follows:

Tax Allocation Agreement: SSIC was added to the agreement between SNCC, Delphi Financial Group (DFG), and other affiliates, effective February 18, 2016, whereby DFG files a consolidated federal tax return annually on behalf of all parties of the agreement. Each party pays its share of the consolidated tax liability as if it had filed its tax return on a separate and individual basis.

Capital Support Agreement: SSIC was added to the agreement between SNCC and TMNF, effective May 20, 2016, whereby TMNF agrees to provide capital necessary to maintain SNCC and SSIC surplus at a level at least equal to 300% of the authorized control level RBC.

Cost Sharing Agreement: An agreement between SSIC and Delphi Capital Management, Inc. (DCM), effective March 22, 2016, whereby DCM provides investment advisory and administrative services to SSIC. SSIC pays DCM for services under the agreement on an at-cost basis.

Inter-Company Service Agreement: An agreement between SNCC and SSIC, effective January 1, 2016, whereby SNCC provides services, staff and data processing functions to SSIC.

Inter-Company Service Agreement: An agreement between SSIC and TMK, effective January 1, 2017, whereby TMK provides claims, legal, administration, actuarial, financial and data processing services related to SSIC's commercial and residential property program reinsured by TMK.

Assumption Agreement: An agreement between SSIC and TMK, effective January 1, 2017, whereby TMK indemnifies SSIC for liabilities not included in the quota share agreement and arising from various commercial and residential property insurance programs written by SSIC and ceded to TMK.

Third Party Administration Agreement: An agreement between SSIC and Precise Adjustments, Inc. (PAI), effective January 1, 2017, whereby PAI provided claims handling services for commercial and residential property coverage written by SSIC and ceded to TMK.

Third Party Administration Agreement: An agreement between SSIC and Midland Claims Administrators (MCA), effective April 1, 2019, whereby MCA provided claims handling services for certain coverages written by SSIC.

Services Agreement: An agreement between SSIC and WNC Insurance Services, Inc. (WNC), an affiliate, effective January 1, 2020, whereby WNC administers certain business underwritten by WNC.

Underwriting Management Agreement: An agreement between SSIC and PURE Programs, LLC (PURE), an affiliate, effective February 15, 2021, whereby PURE underwrites and administers certain business for SSIC and PURE receives a commission for the services provided under the agreement.

Claims Administration Agreement: An agreement between SSIC and PURE, effective February 15, 2021, whereby PURE administers claims for SSIC on business underwritten by PURE.

SSIC has several reinsurance agreements with affiliates, as described in the Assumed Reinsurance section of this report. SSIC had surplus notes issued to affiliates, as described in the Surplus Notes section of this report.

TERRITORY AND PLAN OF OPERATION

SSIC is licensed in Missouri under Chapter 384 RSMo (Surplus Lines Insurance) to write surplus lines insurance in Missouri. The Company is eligible or approved to write surplus lines insurance in all 50 states and the District of Columbia, as well as all U.S. territories and Canada. SSIC currently offers public entity liability, general liability captive, cyber liability, and property insurance.

Gross premiums written decreased 69% in 2023, attributed primarily to the winding down of the property insurance business and the public entity business being renewed with its affiliate, SNCC.

GROWTH OF COMPANY AND LOSS EXPERIENCE

SSIC experienced growth in net premiums written and had a low writing ratio during the examination period. The table below summarizes the Company's premium writings and writing ratios for the period under examination:

(\$000s	omitted)
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Year		Net Premiums Written	Change in Net Premiums	(Capital and Surplus	Ratio of Net Premiums to Surplus
2019	\$	2,132	\$ 1,002	\$	96,731	2%
2020		3,150	1,018		106,854	3%
2021		6,814	3,664		120,539	6%
2022		11,663	4,849		87,838	13%
2023		10,572	(1,091)		71,306	15%

SSIC experienced a decrease in the loss ratio during the examination period. The table below summarizes the Company's incurred losses and loss ratios for the period under examination:

Not Loopee and

(\$000s omitted)

	Net Premiums	oss Adjustment		
Year	Earned	Expenses	Loss Ratio	
2019	\$ 1,686	\$ 1,270	75%	
2020	2,694	1,913	71%	
2021	4,686	2,991	64%	
2022	9,337	5,761	62%	
2023	11,110	7,669	69%	

REINSURANCE

General

The Company's premium activity on a direct written, assumed, and ceded basis for the period under examination is detailed below:

(\$000s omitted)

Premium Type	2019	2020	2021	2022	2023
Direct Premiums Written	\$ 96,552 \$	133,947 \$	197,984 \$	229,520 \$	71,833
Reinsurance Ceded:					
Affiliates	44,077	53,501	68,135	85,678	37,374
Non-Affiliates	50,343	77,297	123,035	132,180	23,887
Net Premiums Written	\$ 2,132 \$	3,150 \$	6,814 \$	11,663 \$	10,572

Assumed Reinsurance

The Company does not assume any business.

Ceded Reinsurance

The Company cedes a large portion of direct business to affiliated and unaffiliated reinsurers to transfer risk exposure. Below is a summary of the key coverages in effect during the examination period.

Effective March 15, 2016, the Company entered a quota share reinsurance agreement with Safety National Casualty Corporation. Under the agreement, the Company cedes 90% of premiums and losses on business classified as Public Officials Liability, Educators Legal Liability and Law Enforcement Liability insurance.

Effective January 1, 2017, the Company entered a fronting arrangement with Tokio Marine Kiln, Ltd. (TMK) to cover commercial and residential property business. Under the arrangement, the Company cedes 100% of premiums and losses to TMK syndicates and unaffiliated reinsurers. The arrangement was terminated effective January 1, 2023.

Effective June 1, 2017, the Company entered a quota share reinsurance agreement with TMK. Under the current agreement, the Company cedes 50% of premiums and losses on business classified as First and Third Party Cyber Liability standalone policies. The limit is \$25 million per policy.

Effective December 1, 2021, the Company entered a fronting arrangement with TMK to cover commercial transportation business. Under the arrangement, the Company cedes 100% of premiums and losses to TMK syndicates.

Effective January 1, 2021, the Company entered a fronting arrangement with PURE Programs, LLC to cover personal lines excess liability and excess & surplus homeowners business. Under the arrangement, the Company cedes 100% of premiums and losses to unaffiliated reinsurers.

The Company is contingently liable for all reinsurance losses ceded to others. This contingent liability would become an actual liability in the event that an assuming reinsurer fails to perform its obligations under the reinsurance contract.

ACCOUNTS AND RECORDS

Independent Auditor

The certified public accounting (CPA) firm, PricewaterhouseCooper LLC, in Saint Louis, Missouri, performed the statutory audit of the Company for all years during the examination period. Reliance was placed upon the CPA workpapers as deemed appropriate.

Actuarial Opinion

The Company's actuarial opinion regarding loss reserves, loss adjustment expense (LAE) reserves, and other actuarial items was issued by T.J. Clinch, for 2019, 2020 and 2021, and David Wolf, for 2022 and 2023. Mr. Clinch and Mr. Wolf are employed by Safety National Casualty Corporation in Saint Louis, Missouri.

Consulting Actuary

Pursuant to a contract with the Department, Kristine Fitzgerald of Actuarial & Technical Solutions, Inc., reviewed the underlying actuarial assumptions and methodologies used by SSIC to determine the adequacy of loss reserves and LAE reserves. Mrs. Fitzgerald determined that the Company made a reasonable provision for the loss and LAE reserves that were reported in the statutory financial statements, as of December 31, 2023.

Information Systems

Pursuant to a contract with the Department, Dennis Schaefer, CISSP of Baker Tilly, conducted a review of the Company's information systems. The Department information technology examiner-in-charge, Kimberly Dobbs, MBA, CFE, AES, CIS, reviewed the work of Baker Tilly.

FINANCIAL STATEMENTS

The following financial statements are based on the statutory financial statements filed by the Company with the Department and present the financial condition of Safety Specialty Insurance Company for the period ending December 31, 2023. The accompanying comments on financial statements reflect any examination adjustments to the amounts reported in the financial statements and should be considered an integral part of the financial statements. The failure of any column of numbers to add to its respective total is due to rounding or truncation.

There may have been additional differences found in the course of this examination, which are not shown in the "Comments on Financial Statement Items." These differences were determined to be immaterial concerning their effect on the financial statements, and therefore were only communicated to the Company and noted in the workpapers for each individual key activity.

ASSETS
As of December 31, 2023

	Assets	Nonadmitted Assets	Net Admitted Assets
Bonds	\$ 155,808,385	0	\$ 155,808,385
Cash, Cash Equivalents, and Short-			
Term Investments	25,680,514	0	25,680,514
Other Invested Assets	695,253	0	695,253
Receivables for Securities	160,000	0	160,000
Investment Income Due and Accrued	1,950,183	0	1,950,183
Premiums and Considerations:			
Uncollected Premiums and			
Agents' Balances in the Course			
of Collection	3,444,465	367,729	3,076,736
Deferred Premiums, Agents'			
Balances, and Installments			
Booked but Deferred and Not Yet			
Due	170,236	0	170,236
Reinsurance:			
Amounts Recoverable from			
Reinsurers	4,799,458	0	4,799,458
Other Amounts Receivable Under			
Reinsurance Contracts	110,978	0	110,978
Current Federal and Foreign Income			
Tax Recoverable and Interest			
Thereon	285,476	0	285,476
Net Deferred Tax Asset	962,643	478,821	483,822
Receivables from Parent,			
Subsidiaries, and Affiliates	569,304	0	569,304
Aggregate Write-Ins for Other-Than-			
Invested Assets	 18,058,708	0	18,058,708
TOTAL ASSETS	\$ 212,695,603	\$ 846,550	\$ 211,849,053

LIABILITIES, SURPLUS AND OTHER FUNDS As of December 31, 2023

Losses	\$ 11,369,632
Loss Adjustment Expenses	2,802,965
Commissions Payable, Contingent Commissions, and Other Similar	
Charges	752,862
Other Expenses	21,802
Taxes, Licenses, and Fees	192,873
Unearned Premiums	5,413,708
Ceded Reinsurance Premiums Payable (Net of Ceding Commissions)	4,070,606
Funds Held by Company Under Reinsurance Treaties	87,421,801
Amounts Withheld or Retained by Company for Account of Others	109
Remittances and Items Not Allocated	3,448,429
Provision for Reinsurance	7,490,896
Payable to Parent, Subsidiaries, and Affiliates	 17,557,162
TOTAL LIABILITIES	\$ 140,542,845
Common Capital Stock	4,200,000
Gross Paid In and Contributed Surplus	59,817,973
Unassigned Funds (Surplus)	7,288,235
TOTAL CAPITAL AND SURPLUS	\$ 71,306,208
TOTAL LIABILITIES AND SURPLUS	\$ 211,849,053

STATEMENT OF INCOME

For the Year Ended December 31, 2023

Premiums Earned DEDUCTIONS:	\$ 11,110,100
Losses Incurred	5,950,376
Loss Adjustment Expenses Incurred	1,718,817
Other Underwriting Expenses Incurred	(1,546,876)
Total Underwriting Deductions	\$ 6,122,317
Net Income of Protected Cells	 0
Net Underwriting Gain (Loss)	\$ 4,987,783
Net Investment Income Earned	5,265,660
Net Realized Capital Gains	 (864,213)
Net Investment Gain (Loss)	\$ 4,401,447
Net Gain (Loss) from Agents' or Premium Balances Charged Off	(3,187)
Federal and Foreign Income Taxes Incurred	 2,059,159
NET INCOME (LOSS)	\$ 7,326,884

RECONCILIATION OF CAPITAL AND SURPLUS

Changes from January 1, 2019 to December 31, 2023

(\$000s omitted)					
	2019	2020	2021	2022	2023
Capital and Surplus,					
Beginning of Year	\$ 85,009 \$	96,731 \$	106,854 \$	120,539 \$	87,838
Net Income (Loss)	7,631	10,032	13,770	15,451	7,327
Change in Net Unrealized					
Capital Gains (Losses)					
Less Capital Gains Tax	170	(50)	2	(845)	187
Change in Net Deferred				, ,	
Income Tax	14	(7)	151	451	106
Change in Nonadmitted		. ,			
Assets	(93)	147	(265)	(425)	(156)
Change in Provision for					
Reinsurance	0	0	(5,571)	(1,524)	(396)
Change in Surplus Notes	4,001	235	6,007	(7,818)	(10,200)
Dividend to Stockholders	0	0	0	(37,810)	(13,400)
Aggregate Write-Ins for					
Gains and Losses in					
Surplus	(1)	(235)	(407)	(182)	0
Net Change in Capital and					
Surplus	11,722	10,122	13,686	(32,702)	(16,532)
Capital and Surplus, End		_			
of Year	\$ 96,731 \$	106,854 \$	120,539 \$	87,838 \$	71,306

COMMENTS ON FINANCIAL STATEMENT ITEMS

None.	
	FINANCIAL STATEMENT CHANGES RESULTING FROM EXAMINATION
None.	
	SUMMARY OF RECOMMENDATIONS
None.	
	SUBSEQUENT EVENTS

There were no significant subsequent events noted from December 31, 2023, through the date

of the report.

ACKNOWLEDGMENT

The assistance and cooperation extended by the officers and the employees of Safety Specialty Insurance Company during the course of this examination is hereby acknowledged and appreciated. In addition to the undersigned, Scott Reeves, CPA, CFE, CAMS, CCA, CHE, CSCD, examiner-in-charge, and James Le, CFE, CPA, CPCU, Ken Tang, CFE, CPCU, CLU and James Simmerman, CFE, CFP, CPCU, ARM, EdD, examiners for the Missouri Department of Commerce and Insurance, also participated in this examination.

VERIFICATION

State of Missouri)	
County of Cole)	SS
)	

I, Brian D. Hammann, CPA, CFE, on my oath swear that to the best of my knowledge and belief the above examination report is true and accurate and is comprised of only facts appearing upon the books, records, or other documents of Safety Specialty Insurance Company, its agents or other persons examined, or as ascertained from the testimony of its officers or agents or other persons examined concerning its affairs, and such conclusions and recommendations as the examiners find reasonably warranted from the facts.

Brian D. Hammann, CPA, CFE

Examiner-In-Charge

Missouri Department of Commerce and

Insurance

Sworn to and subscribed before me this 21

day of

2025

My commission expires: Narch 30 1 202

Notary Public

HAILEY LUEBBERT

NOTARY PUBLIC - NOTARY SEAL

STATE OF MISSOUR!

MY COMMISSION EXPRES MARCH 30, 2027

OSAGE COUNTY

COMMISSION MISSON MI

SUPERVISION

The examination process has been monitored and supervised by the undersigned. The examination report and supporting workpapers have been reviewed and approved. Compliance with NAIC procedures and guidelines as contained in the *Financial Condition Examiners Handbook* has been confirmed, except where practices, procedures, and applicable regulations of the Missouri Department of Commerce and Insurance and statutes of the state of Missouri prevailed.

Michael R. Shadowens, CFE

Assistant Chief Financial Examiner
Missouri Department of Commerce and

Insurance