

PROPERTY AND CASUALTY COMPANIES - ASSOCIATION EDITION

QUARTERLY STATEMENT

AS OF SEPTEMBER 30, 2024
OF THE CONDITION AND AFFAIRS OF THE

American Commerce Insurance Company

NAIC Group Code 0411 (Current) 0411 (Prior) NAIC Company Code 19941 Employer's ID Number 31-4361173
Organized under the Laws of Ohio, State of Domicile or Port of Entry OH

Country of Domicile United States of America

Incorporated/Organized 09/18/1946 Commenced Business 03/19/1947

Statutory Home Office 4400 EASTON COMMONS WAY, SUITE 125 COLUMBUS, OH, US 43219
(Street and Number) (City or Town, State, Country and Zip Code)

Main Administrative Office 211 MAIN STREET 508-943-9000
(Street and Number) (Area Code) (Telephone Number)

Webster, MA, US 01570-0758
(City or Town, State, Country and Zip Code) (Area Code) (Telephone Number)

Mail Address 211 MAIN STREET WEBSTER, MA, US 01570-0758
(Street and Number or P.O. Box) (City or Town, State, Country and Zip Code)

Primary Location of Books and Records 211 MAIN STREET 508-943-9000
(Street and Number) (Area Code) (Telephone Number)

Internet Website Address www.mapfreinsurance.com

Statutory Statement Contact CHRISTINE A CONRAD 508-943-9000-14376
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OFFICERS

PRESIDENT & CEO JAMIE TAMAYO TREASURER, CHIEF ACCOUNTING OFFICER & SVP JOHN MARTIN MECIAK, JR.

SECRETARY DANIEL PATRICK OLOHAN CHIEF FINANCIAL OFFICER & EVP JESUS ALBERTO AMADORI CARRILLO

OTHER

DIRECTORS OR TRUSTEES

RANDALL VAUGHN BECKER JAMIE TAMAYO DAVID MATTHEW MCMLLEN

TIMOTHY JOHN MORGAN DANIEL PATRICK OLOHAN HEATHER MARIE WAHL SNAVELY

State of Massachusetts SS:
County of Worcester

The officers of this reporting entity being duly sworn, each depose and say that they are the described officers of said reporting entity, and that on the reporting period stated above, all of the herein described assets were the absolute property of the said reporting entity, free and clear from any liens or claims thereon, except as herein stated, and that this statement, together with related exhibits, schedules and explanations therein contained, annexed or referred to, is a full and true statement of all the assets and liabilities and of the condition and affairs of the said reporting entity as of the reporting period stated above, and of its income and deductions therefrom for the period ended, and have been completed in accordance with the NAIC Annual Statement Instructions and Accounting Practices and Procedures manual except to the extent that (1) state law may differ or, (2) that state rules or regulations require differences in reporting not related to accounting practices and procedures, according to the best of their information, knowledge and belief, respectively. Furthermore, the scope of this attestation by the described officers also includes the related corresponding electronic filing with the NAIC, when required, that is an exact copy (except for formatting differences due to electronic filing) of the enclosed statement. The electronic filing may be requested by various regulators in lieu of or in addition to the enclosed statement.

JAMIE TAMAYO DANIEL PATRICK OLOHAN JOHN MARTIN MECIAK, JR.
PRESIDENT & CEO SECRETARY TREASURER, CHIEF ACCOUNTING OFFICER & SVP

Subscribed and sworn to before me this September 2024 day of Yes [X] No []

- a. Is this an original filing?
b. If no, 1. State the amendment number
2. Date filed
3. Number of pages attached

Mary Ellen Graves
Notary Public
February 8, 2030
MARY ELLEN GRAVES
NOTARY PUBLIC
Commonwealth of Massachusetts
My Commission Expires
February 8, 2030



STATEMENT AS OF SEPTEMBER 30, 2024 OF THE AMERICAN COMMERCE INSURANCE COMPANY

ASSETS

	Current Statement Date			4 December 31 Prior Year Net Admitted Assets
	1 Assets	2 Nonadmitted Assets	3 Net Admitted Assets (Cols. 1 – 2)	
1. Bonds	195,293,642		195,293,642	199,466,630
2. Stocks:				
2.1 Preferred stocks	2,599,440		2,599,440	2,411,220
2.2 Common stocks	14,496,340		14,496,340	0
3. Mortgage loans on real estate:				
3.1 First liens			0	0
3.2 Other than first liens.....			0	0
4. Real estate:				
4.1 Properties occupied by the company (less \$ encumbrances)			0	0
4.2 Properties held for the production of income (less \$ encumbrances)			0	0
4.3 Properties held for sale (less \$ encumbrances)			0	0
5. Cash (\$9,810,287), cash equivalents (\$ 1,975,227) and short-term investments (\$ 3,860,647)	15,646,161		15,646,161	13,732,973
6. Contract loans (including \$ premium notes)			0	0
7. Derivatives			0	0
8. Other invested assets			0	0
9. Receivables for securities			0	0
10. Securities lending reinvested collateral assets			0	0
11. Aggregate write-ins for invested assets	0	0	0	0
12. Subtotals, cash and invested assets (Lines 1 to 11)	228,035,583	0	228,035,583	215,610,823
13. Title plants less \$ charged off (for Title insurers only)			0	0
14. Investment income due and accrued	1,514,050		1,514,050	1,449,630
15. Premiums and considerations:				
15.1 Uncollected premiums and agents' balances in the course of collection	24,326,046		24,326,046	26,300,731
15.2 Deferred premiums, agents' balances and installments booked but deferred and not yet due (including \$ earned but unbilled premiums)	17,539,826		17,539,826	14,435,594
15.3 Accrued retrospective premiums (\$) and contracts subject to redetermination (\$)			0	0
16. Reinsurance:				
16.1 Amounts recoverable from reinsurers	13,048,617		13,048,617	11,164,656
16.2 Funds held by or deposited with reinsured companies			0	0
16.3 Other amounts receivable under reinsurance contracts			0	0
17. Amounts receivable relating to uninsured plans			0	0
18.1 Current federal and foreign income tax recoverable and interest thereon			0	2,402,404
18.2 Net deferred tax asset	3,604,588	139,368	3,465,220	3,253,905
19. Guaranty funds receivable or on deposit			0	0
20. Electronic data processing equipment and software	72,173		72,173	137,122
21. Furniture and equipment, including health care delivery assets (\$)	37,343	37,343	0	0
22. Net adjustment in assets and liabilities due to foreign exchange rates			0	0
23. Receivables from parent, subsidiaries and affiliates	6,316,593		6,316,593	2,846,186
24. Health care (\$) and other amounts receivable			0	0
25. Aggregate write-ins for other than invested assets	75,716,500	1,050,616	74,665,884	74,859,545
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 to 25)	370,211,319	1,227,327	368,983,992	352,460,596
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts			0	0
28. Total (Lines 26 and 27)	370,211,319	1,227,327	368,983,992	352,460,596
DETAILS OF WRITE-INS				
1101.				
1102.				
1103.				
1198. Summary of remaining write-ins for Line 11 from overflow page	0	0	0	0
1199. Totals (Lines 1101 through 1103 plus 1198)(Line 11 above)	0	0	0	0
2501. Prepaid expenses	1,050,616	1,050,616	0	0
2502. Equity in pools and associations	73,949,131		73,949,131	72,726,260
2503. Premium Tax Recoverable	716,753		716,753	2,133,285
2598. Summary of remaining write-ins for Line 25 from overflow page	0	0	0	0
2599. Totals (Lines 2501 through 2503 plus 2598)(Line 25 above)	75,716,500	1,050,616	74,665,884	74,859,545

STATEMENT AS OF SEPTEMBER 30, 2024 OF THE AMERICAN COMMERCE INSURANCE COMPANY

LIABILITIES, SURPLUS AND OTHER FUNDS

	1 Current Statement Date	2 December 31, Prior Year
1. Losses (current accident year \$ 41,854,000)	92,434,040	93,794,465
2. Reinsurance payable on paid losses and loss adjustment expenses	9,461,829	7,720,096
3. Loss adjustment expenses	10,586,478	10,676,910
4. Commissions payable, contingent commissions and other similar charges	2,591,523	1,864,838
5. Other expenses (excluding taxes, licenses and fees)	790,636	798,884
6. Taxes, licenses and fees (excluding federal and foreign income taxes)	13,947	90,993
7.1 Current federal and foreign income taxes (including \$ (93,136) on realized capital gains (losses))	1,165,050	
7.2 Net deferred tax liability		
8. Borrowed money \$ and interest thereon \$		
9. Unearned premiums (after deducting unearned premiums for ceded reinsurance of \$ 179,577,488 and including warranty reserves of \$ and accrued accident and health experience rating refunds including \$ 0 for medical loss ratio rebate per the Public Health Service Act)	117,125,352	111,909,377
10. Advance premium	3,034,021	1,754,783
11. Dividends declared and unpaid:		
11.1 Stockholders		
11.2 Policyholders		
12. Ceded reinsurance premiums payable (net of ceding commissions)	12,611,343	9,553,207
13. Funds held by company under reinsurance treaties		0
14. Amounts withheld or retained by company for account of others		
15. Remittances and items not allocated		
16. Provision for reinsurance (including \$ certified)		0
17. Net adjustments in assets and liabilities due to foreign exchange rates		
18. Drafts outstanding		
19. Payable to parent, subsidiaries and affiliates		
20. Derivatives	0	0
21. Payable for securities		
22. Payable for securities lending		
23. Liability for amounts held under uninsured plans		
24. Capital notes \$ and interest thereon \$		
25. Aggregate write-ins for liabilities	737,427	948,108
26. Total liabilities excluding protected cell liabilities (Lines 1 through 25)	250,551,646	239,111,661
27. Protected cell liabilities		
28. Total liabilities (Lines 26 and 27)	250,551,646	239,111,661
29. Aggregate write-ins for special surplus funds	0	0
30. Common capital stock	3,226,140	3,226,140
31. Preferred capital stock		
32. Aggregate write-ins for other than special surplus funds	0	0
33. Surplus notes	4,000,000	4,000,000
34. Gross paid in and contributed surplus	67,714,462	67,714,462
35. Unassigned funds (surplus)	43,491,744	38,408,333
36. Less treasury stock, at cost:		
36.1 shares common (value included in Line 30 \$)		
36.2 shares preferred (value included in Line 31 \$)		
37. Surplus as regards policyholders (Lines 29 to 35, less 36)	118,432,346	113,348,935
38. Totals (Page 2, Line 28, Col. 3)	368,983,992	352,460,596
DETAILS OF WRITE-INS		
2501. Unclaimed Property	394,577	689,565
2502. Global Premium Tax Payable	342,388	258,543
2503. FAIR PLAN SETTLEMENT	462	0
2598. Summary of remaining write-ins for Line 25 from overflow page	0	0
2599. Totals (Lines 2501 through 2503 plus 2598)(Line 25 above)	737,427	948,108
2901.		
2902.		
2903.		
2998. Summary of remaining write-ins for Line 29 from overflow page	0	0
2999. Totals (Lines 2901 through 2903 plus 2998)(Line 29 above)	0	0
3201.		
3202.		
3203.		
3298. Summary of remaining write-ins for Line 32 from overflow page	0	0
3299. Totals (Lines 3201 through 3203 plus 3298)(Line 32 above)	0	0

STATEMENT OF INCOME

	1	2	3
	Current Year to Date	Prior Year to Date	Prior Year Ended December 31
UNDERWRITING INCOME			
1. Premiums earned:			
1.1 Direct (written \$142,257,273)	138,878,076	133,259,693	179,103,342
1.2 Assumed (written \$164,285,732)	159,069,757	148,696,443	200,393,051
1.3 Ceded (written \$142,257,273)	138,878,076	133,259,693	179,103,342
1.4 Net (written \$164,285,732)	159,069,757	148,696,443	200,393,051
DEDUCTIONS:			
2. Losses incurred (current accident year \$99,045,000):			
2.1 Direct	72,189,364	85,076,982	111,893,704
2.2 Assumed	97,004,822	101,479,580	135,591,594
2.3 Ceded	72,189,364	85,076,982	111,893,704
2.4 Net	97,004,822	101,479,580	135,591,594
3. Loss adjustment expenses incurred	18,977,307	19,572,388	25,776,458
4. Other underwriting expenses incurred	42,892,611	45,184,644	58,145,264
5. Aggregate write-ins for underwriting deductions	0	0	0
6. Total underwriting deductions (Lines 2 through 5)	158,874,740	166,236,612	219,513,316
7. Net income of protected cells			
8. Net underwriting gain (loss) (Line 1 minus Line 6 + Line 7)	195,017	(17,540,169)	(19,120,265)
INVESTMENT INCOME			
9. Net investment income earned	5,006,842	3,984,868	5,774,986
10. Net realized capital gains (losses) less capital gains tax of \$93,136	307,183	(641,404)	(650,464)
11. Net investment gain (loss) (Lines 9 + 10)	5,314,025	3,343,464	5,124,522
OTHER INCOME			
12. Net gain or (loss) from agents' or premium balances charged off (amount recovered \$ amount charged off \$)	0	0	0
13. Finance and service charges not included in premiums	624,530	696,184	918,541
14. Aggregate write-ins for miscellaneous income	8,514	(3,004)	(3,006)
15. Total other income (Lines 12 through 14)	633,044	693,180	915,535
16. Net income before dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes (Lines 8 + 11 + 15)	6,142,086	(13,503,525)	(13,080,208)
17. Dividends to policyholders			
18. Net income, after dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes (Line 16 minus Line 17)	6,142,086	(13,503,525)	(13,080,208)
19. Federal and foreign income taxes incurred	1,071,916	(2,408,068)	(2,378,318)
20. Net income (Line 18 minus Line 19)(to Line 22)	5,070,170	(11,095,457)	(10,701,890)
CAPITAL AND SURPLUS ACCOUNT			
21. Surplus as regards policyholders, December 31 prior year	113,348,935	99,782,215	99,782,215
22. Net income (from Line 20)	5,070,170	(11,095,457)	(10,701,890)
23. Net transfers (to) from Protected Cell accounts			
24. Change in net unrealized capital gains (losses) less capital gains tax of \$(119,981)	451,356	(272,724)	(242,369)
25. Change in net unrealized foreign exchange capital gain (loss)			
26. Change in net deferred income tax	115,224	630,592	612,327
27. Change in nonadmitted assets	541,277	(489,524)	(726,447)
28. Change in provision for reinsurance			0
29. Change in surplus notes			0
30. Surplus (contributed to) withdrawn from protected cells			
31. Cumulative effect of changes in accounting principles			
32. Capital changes:			
32.1 Paid in			
32.2 Transferred from surplus (Stock Dividend)			
32.3 Transferred to surplus			
33. Surplus adjustments:			
33.1 Paid in	0	0	25,000,000
33.2 Transferred to capital (Stock Dividend)			
33.3 Transferred from capital			
34. Net remittances from or (to) Home Office			
35. Dividends to stockholders			0
36. Change in treasury stock			0
37. Aggregate write-ins for gains and losses in surplus	(1,094,616)	(512,999)	(374,901)
38. Change in surplus as regards policyholders (Lines 22 through 37)	5,083,411	(11,740,112)	13,566,720
39. Surplus as regards policyholders, as of statement date (Lines 21 plus 38)	118,432,346	88,042,103	113,348,935
DETAILS OF WRITE-INS			
0501.			
0502.			
0503.			
0598. Summary of remaining write-ins for Line 5 from overflow page	0	0	0
0599. Totals (Lines 0501 through 0503 plus 0598)(Line 5 above)	0	0	0
1401. MISCELLANEOUS INCOME	8,514	0	0
1402. LOSS ON SALE OF FIXED ASSETS		(3,004)	(3,006)
1403.			
1498. Summary of remaining write-ins for Line 14 from overflow page	0	0	0
1499. Totals (Lines 1401 through 1403 plus 1498)(Line 14 above)	8,514	(3,004)	(3,006)
3701. STATUTORY POOLING ADJUSTMENT	(1,094,616)	(512,999)	(374,901)
3702.			
3703.			
3798. Summary of remaining write-ins for Line 37 from overflow page	0	0	0
3799. Totals (Lines 3701 through 3703 plus 3798)(Line 37 above)	(1,094,616)	(512,999)	(374,901)

STATEMENT AS OF SEPTEMBER 30, 2024 OF THE AMERICAN COMMERCE INSURANCE COMPANY

CASH FLOW

	1 Current Year To Date	2 Prior Year To Date	3 Prior Year Ended December 31
Cash from Operations			
1. Premiums collected net of reinsurance	167,493,559	163,111,390	206,796,202
2. Net investment income	5,369,010	4,366,615	6,204,042
3. Miscellaneous income	633,044	693,180	915,535
4. Total (Lines 1 to 3)	173,495,613	168,171,185	213,915,779
5. Benefit and loss related payments	98,507,475	104,932,772	136,614,426
6. Net transfers to Separate Accounts, Segregated Accounts and Protected Cell Accounts	0	0	0
7. Commissions, expenses paid and aggregate write-ins for deductions	62,413,575	64,732,457	83,707,075
8. Dividends paid to policyholders	0	0	0
9. Federal and foreign income taxes paid (recovered) net of \$ tax on capital gains (losses)	(2,402,402)	(3,464,119)	(3,507,100)
10. Total (Lines 5 through 9)	158,518,648	166,201,110	216,814,401
11. Net cash from operations (Line 4 minus Line 10)	14,976,965	1,970,075	(2,898,622)
Cash from Investments			
12. Proceeds from investments sold, matured or repaid:			
12.1 Bonds	44,778,143	6,241,932	8,170,553
12.2 Stocks	0	0	0
12.3 Mortgage loans	0	0	0
12.4 Real estate	0	0	0
12.5 Other invested assets	0	0	0
12.6 Net gains or (losses) on cash, cash equivalents and short-term investments	0	0	0
12.7 Miscellaneous proceeds	0	0	0
12.8 Total investment proceeds (Lines 12.1 to 12.7)	44,778,143	6,241,932	8,170,553
13. Cost of investments acquired (long-term only):			
13.1 Bonds	40,631,586	6,362,587	18,730,145
13.2 Stocks	14,113,062	0	0
13.3 Mortgage loans	0	0	0
13.4 Real estate	0	0	0
13.5 Other invested assets	0	0	0
13.6 Miscellaneous applications	0	0	0
13.7 Total investments acquired (Lines 13.1 to 13.6)	54,744,648	6,362,587	18,730,145
14. Net increase (or decrease) in contract loans and premium notes	0	0	0
15. Net cash from investments (Line 12.8 minus Line 13.7 and Line 14)	(9,966,505)	(120,655)	(10,559,592)
Cash from Financing and Miscellaneous Sources			
16. Cash provided (applied):			
16.1 Surplus notes, capital notes	0	0	0
16.2 Capital and paid in surplus, less treasury stock	0	0	25,000,000
16.3 Borrowed funds	0	0	0
16.4 Net deposits on deposit-type contracts and other insurance liabilities	0	0	0
16.5 Dividends to stockholders	0	0	0
16.6 Other cash provided (applied)	(3,097,272)	(6,614,007)	(1,656,066)
17. Net cash from financing and miscellaneous sources (Line 16.1 through Line 16.4 minus Line 16.5 plus Line 16.6)	(3,097,272)	(6,614,007)	23,343,934
RECONCILIATION OF CASH, CASH EQUIVALENTS AND SHORT-TERM INVESTMENTS			
18. Net change in cash, cash equivalents and short-term investments (Line 11, plus Lines 15 and 17) .	1,913,188	(4,764,587)	9,885,720
19. Cash, cash equivalents and short-term investments:			
19.1 Beginning of year	13,732,972	3,847,252	3,847,252
19.2 End of period (Line 18 plus Line 19.1)	15,646,160	(917,335)	13,732,972

Note: Supplemental disclosures of cash flow information for non-cash transactions:

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NOTES TO FINANCIAL STATEMENTS

NOTE 1 Summary of Significant Accounting Policies and Going Concern

A. Accounting Practices

The accompanying financial statements of American Commerce Insurance Company (the Company) have been prepared in conformity with the accounting practices prescribed or permitted by the National Association of Insurance Commissioners (NAIC) and the State of Ohio. The NAIC Accounting Practices and Procedures manual (NAIC SAP) has been adopted as a component of prescribed or permitted practices by the State of Ohio.

There are no differences between Ohio prescribed practices and NAIC statutory accounting practices (NAIC SAP) as noted below:

	SSAP #	F/S Page	F/S Line #	2024	2023
NET INCOME					
(1) State basis (Page 4, Line 20, Columns 1 & 3)	XXX	XXX	XXX	\$ 5,070,170	\$ (10,701,890)
(2) State Prescribed Practices that are an increase/ (decrease) from NAIC SAP:					
(3) State Permitted Practices that are an increase/(decrease) from NAIC SAP:					
(4) NAIC SAP (1-2-3=4)	XXX	XXX	XXX	\$ 5,070,170	\$ (10,701,890)
SURPLUS					
(5) State basis (Page 3, Line 37, Columns 1 & 2)	XXX	XXX	XXX	\$ 118,432,346	\$ 113,348,935
(6) State Prescribed Practices that are an increase/(decrease) from NAIC SAP:					
(7) State Permitted Practices that are an increase/(decrease) from NAIC SAP:					
(8) NAIC SAP (5-6-7=8)	XXX	XXX	XXX	\$ 118,432,346	\$ 113,348,935

C. Accounting Policy

(2) Basis for Bonds and Amortization Schedule

Bonds, excluding Loan-Backed and Structured Securities, are accounted for in accordance with SSAP No. 26. Amortized cost is calculated using the scientific interest method. Bonds containing call provisions are amortized to either the call or maturity value and date, whichever produces the lowest asset value (yield to worst). Investment grade bonds are stated at amortized cost. Non-investment grade bonds are stated at the lower of amortized cost or fair value. Bonds whose decline has been determined to be Other-Than-Temporary are written down to a new cost basis and the write-down amount is accounted for as a realized loss.

(6) Basis for Loan-Backed Securities and Adjustment Methodology

Loan-Backed and Structured Securities are accounted for in accordance with SSAP No. 43. Amortized cost is calculated retrospectively using the scientific interest method. U.S. government agency Loan-Backed and Structured Securities are valued at amortized value. Other Loan-Backed and Structured Securities are valued at either amortized value or fair value, depending on many factors including: the type of underlying collateral, whether modeled by a NAIC vendor, whether rated (by either a NAIC approved rating organization or the NAIC Securities Valuation Office), and the relationship of amortized value to par value and amortized value to fair value. Bonds whose decline has been determined to be Other-Than-Temporary are written down to a new cost basis and the write down amount is accounted for as a realized loss.

D. Going Concern

Based on its evaluation of relevant conditions and events, management does not have substantial doubt about the Company's ability to continue as a going concern.

NOTE 2 Accounting Changes and Corrections of Errors

No significant change

NOTE 3 Business Combinations and Goodwill

No significant change

NOTE 4 Discontinued Operations

No significant change

NOTE 5 Investments

D. Loan-Backed Securities

- (1) Prepayment assumptions for Loan-Backed and Structured Securities were obtained from broker dealer survey values, internal estimates, or Bloomberg.
- (2) During third quarter 2024 the Company did not recognize Other-Than-Temporary Impairments on Loan-Backed and Structured Securities based on the intent to sell or inability to retain.
- (3) During third quarter 2024 the Company did not recognize Other-Than-Temporary Impairments on Loan-Backed and Structured Securities based on the value of future cash flows expected to be less than the amortized cost of the security.
- (4) All Loan-Backed and Structured Securities in an unrealized loss position as of quarter end

a) The aggregate amount of unrealized losses:

1. Less than 12 Months\$ -

2. 12 Months or Longer\$ 1,782,333

b) The aggregate related fair value of securities with unrealized losses:

1. Less than 12 Months\$ -

2. 12 Months or Longer\$ 13,564,087

NOTES TO FINANCIAL STATEMENTS

(5) Information Investor Considered in Reaching Conclusion that Impairments are Not Other-Than-Temporary

All Loan-Backed and Structured Securities in an unrealized loss position were reviewed to determine whether Other-Than-Temporary impairments should be recognized. The Company asserts that it has the intent and ability to hold these securities long enough to allow the cost basis of these securities to be recovered. These conclusions are supported by analysis of the underlying credit and cash flows of each security. Unrealized losses are primarily attributable to general changes in interest rates, credit spread widening, and increased liquidity discounts. It is possible that the Company could recognize Other-Than-Temporary Impairments in the future on some of the securities, if future events, information and the passage of time cause it to conclude that declines in the value are Other-Than-Temporary.

E. Dollar Repurchase Agreements and/or Securities Lending Transactions

(3) Collateral Received

b. Not applicable

F. Repurchase Agreements Transactions Accounted for as Secured Borrowing

REPURCHASE TRANSACTION – CASH TAKER – OVERVIEW OF SECURED BORROWING TRANSACTIONS

Not applicable

G. Reverse Repurchase Agreements Transactions Accounted for as Secured Borrowing

REPURCHASE TRANSACTION – CASH PROVIDER – OVERVIEW OF SECURED BORROWING TRANSACTIONS

Not applicable

H. Repurchase Agreements Transactions Accounted for as a Sale

REPURCHASE TRANSACTION – CASH TAKER – OVERVIEW OF SALE TRANSACTIONS

Not applicable

I. Reverse Repurchase Agreements Transactions Accounted for as a Sale

REPURCHASE TRANSACTION – CASH PROVIDER – OVERVIEW OF SALE TRANSACTIONS

Not applicable

M. Working Capital Finance Investments

2. Not applicable

3. Not applicable

N. Offsetting and Netting of Assets and Liabilities

Not applicable

R. Reporting Entity's Share of Cash Pool by Asset Type

Not applicable

NOTE 6 Joint Ventures, Partnerships and Limited Liability Companies

No significant change

NOTE 7 Investment Income

A. The bases, by category of investment income, for excluding (nonadmitting) any investment income due and accrued:

Investment income due and accrued with amounts over 90 days past due are non-admitted assets and excluded from surplus.

B. The total amount excluded:

Not applicable

C. The gross, nonadmitted and admitted amounts for interest income due and accrued.

Interest Income Due and Accrued	Amount
1. Gross	\$ 1,514,050
2. Nonadmitted	
3. Admitted	\$ 1,514,050

D. The aggregate deferred interest.

Not applicable

E. The cumulative amounts of paid-in-kind (PIK) interest included in the current principal balance.

Not applicable

NOTE 8 Derivative Instruments

A. Derivatives under SSAP No. 86—Derivatives

(8) Not applicable

B. Derivatives under SSAP No. 108—Derivative Hedging Variable Annuity Guarantees

(2) Recognition of gains/losses and deferred assets and liabilities

- a. Not applicable
- b. Not applicable
- c. Not applicable

NOTE 9 Income Taxes

NOTES TO FINANCIAL STATEMENTS

No significant change

NOTE 10 Information Concerning Parent, Subsidiaries, Affiliates and Other Related Parties

No significant change

NOTE 11 Debt

B. FHLB (Federal Home Loan Bank) Agreements

Not applicable

NOTE 12 Retirement Plans, Deferred Compensation, Postemployment Benefits and Compensated Absences and Other Postretirement Benefit Plans

A. Defined Benefit Plan

(4) Components of net periodic benefit cost

Not applicable

NOTE 13 Capital and Surplus, Dividend Restrictions and Quasi-Reorganizations

No significant change

NOTE 14 Liabilities, Contingencies and Assessments

No significant change

NOTE 15 Leases

No significant change

NOTE 16 Information About Financial Instruments With Off-Balance Sheet Risk and Financial Instruments With Concentrations of Credit Risk

No significant change

NOTE 17 Sale, Transfer and Servicing of Financial Assets and Extinguishments of Liabilities

B. Transfer and Servicing of Financial Assets

(2) Servicing Assets and Servicing Liabilities

Not applicable

(4) Securitizations, Asset-Based Financing Arrangements and Similar Transfers Accounted for as Sales

(a) Not applicable

(b) Not applicable

C. Wash Sales

(1) In the course of the Company's asset management, no securities were sold and reacquired within 30 days of the sale date.

(2) The details by NAIC designation 3 or below, or unrated of securities sold during the current quarter and reacquired within 30 days of the sale date are:

Not applicable

NOTE 18 Gain or Loss to the Reporting Entity from Uninsured Plans and the Uninsured Portion of Partially Insured Plans

No significant change

NOTE 19 Direct Premium Written/Produced by Managing General Agents/Third Party Administrators

No significant change

NOTE 20 Fair Value Measurements

A. Inputs Used for Assets and Liabilities Measured and Reported at Fair Value.

(1) Summary of Financial Assets Measured and Reported at Fair Value at 9/30/24

Description for each class of asset or liability	(Level 1)	(Level 2)	(Level 3)	Net Asset Value (NAV)	Total
a. Assets at fair value					
Bonds		\$ 585,467			\$ 585,467
Preferred Stock		\$ 2,599,440			\$ 2,599,440
Common Stocks	\$ 14,496,340				\$ 14,496,340
Total assets at fair value/NAV	\$ 14,496,340	\$ 3,184,907	\$ -	\$ -	\$ 17,681,247

(2) Fair Value Measurements in (Level 3) of the Fair Value hierarchy

Not applicable

(3) Policies when Transfers Between Levels are Recognized

At the end of each reporting period, the Company evaluates whether or not any event has occurred or circumstances have changed that would cause an instrument to be transferred into or out of a level.

(4) Description of Valuation Techniques and Inputs Used in Fair Value Measurement

NOTES TO FINANCIAL STATEMENTS

Financial Assets included in Level 1 of the Fair Value Hierarchy include US Treasury securities and exchange traded common stock where prices are obtained directly from active markets.

Financial Assets included in Level 2 of the Fair Value Hierarchy are securities priced by the company's custodial bank and based on observable market data.

Financial Assets included in Level 3 of the Fair Value Hierarchy are securities priced utilizing broker quotes or internal pricing determined by insurer.

(5) Derivative Fair Value Disclosures

The Company does not hold derivative assets or liabilities.

B. Fair Value Reporting under SSAP 100 and Other Accounting Pronouncements

Not applicable

C. Fair Value for all Financial Instruments by Levels 1, 2, and 3

Type of Financial Instrument	Aggregate Fair Value	Admitted Assets	(Level 1)	(Level 2)	(Level 3)	Net Asset Value (NAV)	Not Practicable (Carrying Value)
Bonds	\$ 180,696,768	\$ 195,293,642	\$ 11,471,285	\$ 169,225,483			
Preferred Stock	\$ 2,599,440	\$ 2,599,440	\$ -	\$ 2,599,440			
Common Stock	\$ 14,496,340	\$ 14,496,340	\$ 14,496,340				
Short Term	\$ 3,912,620	\$ 3,860,647	\$ 3,912,620				
Cash and Cash Equivalents	\$ 1,995,840	\$ 1,975,227	\$ 1,995,840				
Total	\$ 203,701,008	\$ 218,225,296	\$ 31,876,085	\$ 171,824,923			

D. Not Practicable to Estimate Fair Value

Not applicable

E. Instruments measured at Net Asset Value (NAV)

Not applicable

NOTE 21 Other Items

No significant change

NOTE 22 Events Subsequent

Type I – Recognized Subsequent Events:

Subsequent events have been considered through November 14, 2024 for these statutory financial statements which are to be issued on November 15, 2024.

Type II – Nonrecognized Subsequent Events:

None

NOTE 23 Reinsurance

No significant change

NOTE 24 Retrospectively Rated Contracts & Contracts Subject to Redetermination

F. Risk Sharing Provisions of the Affordable Care Act

Not applicable

NOTE 25 Change in Incurred Losses and Loss Adjustment Expenses

Current year losses and LAE reflected on the Statement of Income of \$115,982,129 were lower by \$2,186,000 due to favorable development of prior year estimates. This redundancy was 2.1% of the unpaid losses and LAE of \$104,471,375 as of prior year-end.

NOTE 26 Intercompany Pooling Arrangements

No significant change

NOTE 27 Structured Settlements

No significant change

NOTE 28 Health Care Receivables

No significant change

NOTE 29 Participating Policies

No significant change

NOTE 30 Premium Deficiency Reserves

The Company evaluated the need to record a premium deficiency reserve as of the end of the current quarter. This evaluation was completed on October 10, 2024 and it was determined that the Company does not have a premium deficiency.

NOTE 31 High Deductibles

No significant change

NOTE 32 Discounting of Liabilities for Unpaid Losses or Unpaid Loss Adjustment Expenses

No significant change

NOTE 33 Asbestos/Environmental Reserves

NOTES TO FINANCIAL STATEMENTS

No significant change

NOTE 34 Subscriber Savings Accounts

No significant change

NOTE 35 Multiple Peril Crop Insurance

No significant change

NOTE 36 Financial Guaranty Insurance

B. Schedule of insured financial obligations at the end of the period

Not applicable

STATEMENT AS OF SEPTEMBER 30, 2024 OF THE AMERICAN COMMERCE INSURANCE COMPANY

GENERAL INTERROGATORIES

PART 1 - COMMON INTERROGATORIES

GENERAL

- 1.1

Did the reporting entity experience any material transactions requiring the filing of Disclosure of Material Transactions with the State of Domicile, as required by the Model Act?

Yes [] No [X]
- 1.2

If yes, has the report been filed with the domiciliary state?

Yes [] No []
- 2.1

Has any change been made during the year of this statement in the charter, by-laws, articles of incorporation, or deed of settlement of the reporting entity?

Yes [] No [X]
- 2.2

If yes, date of change:
- 3.1

Is the reporting entity a member of an Insurance Holding Company System consisting of two or more affiliated persons, one or more of which is an insurer?
If yes, complete Schedule Y, Parts 1 and 1A.

Yes [X] No []
- 3.2

Have there been any substantial changes in the organizational chart since the prior quarter end?

Yes [] No [X]
- 3.3

If the response to 3.2 is yes, provide a brief description of those changes.
.....
- 3.4

Is the reporting entity publicly traded or a member of a publicly traded group?

Yes [] No [X]
- 3.5

If the response to 3.4 is yes, provide the CIK (Central Index Key) code issued by the SEC for the entity/group.
- 4.1

Has the reporting entity been a party to a merger or consolidation during the period covered by this statement?

Yes [] No [X]
- 4.2

If yes, provide the name of the entity, NAIC Company Code, and state of domicile (use two letter state abbreviation) for any entity that has ceased to exist as a result of the merger or consolidation.

1	2	3
Name of Entity	NAIC Company Code	State of Domicile
5.

If the reporting entity is subject to a management agreement, including third-party administrator(s), managing general agent(s), attorney-in-fact, or similar agreement, have there been any significant changes regarding the terms of the agreement or principals involved?
If yes, attach an explanation.
.....

Yes [] No [X] N/A []
- 6.1

State as of what date the latest financial examination of the reporting entity was made or is being made.

12/31/2023
- 6.2

State the as of date that the latest financial examination report became available from either the state of domicile or the reporting entity. This date should be the date of the examined balance sheet and not the date the report was completed or released.

12/31/2018
- 6.3

State as of what date the latest financial examination report became available to other states or the public from either the state of domicile or the reporting entity. This is the release date or completion date of the examination report and not the date of the examination (balance sheet date).

06/30/2020
- 6.4

By what department or departments?
State of Ohio Department of Insurance
- 6.5

Have all financial statement adjustments within the latest financial examination report been accounted for in a subsequent financial statement filed with Departments?

Yes [] No [] N/A [X]
- 6.6

Have all of the recommendations within the latest financial examination report been complied with?

Yes [] No [] N/A [X]
- 7.1

Has this reporting entity had any Certificates of Authority, licenses or registrations (including corporate registration, if applicable) suspended or revoked by any governmental entity during the reporting period?

Yes [] No [X]
- 7.2

If yes, give full information:
.....
- 8.1

Is the company a subsidiary of a bank holding company regulated by the Federal Reserve Board?

Yes [] No [X]
- 8.2

If response to 8.1 is yes, please identify the name of the bank holding company.
.....
- 8.3

Is the company affiliated with one or more banks, thrifts or securities firms?

Yes [] No [X]
- 8.4

If response to 8.3 is yes, please provide below the names and location (city and state of the main office) of any affiliates regulated by a federal regulatory services agency [i.e. the Federal Reserve Board (FRB), the Office of the Comptroller of the Currency (OCC), the Federal Deposit Insurance Corporation (FDIC) and the Securities Exchange Commission (SEC)] and identify the affiliate's primary federal regulator.

1	2	3	4	5	6
Affiliate Name	Location (City, State)	FRB	OCC	FDIC	SEC

STATEMENT AS OF SEPTEMBER 30, 2024 OF THE AMERICAN COMMERCE INSURANCE COMPANY

GENERAL INTERROGATORIES

9.1

Are the senior officers (principal executive officer, principal financial officer, principal accounting officer or controller, or persons performing similar functions) of the reporting entity subject to a code of ethics, which includes the following standards?
(a) Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
(b) Full, fair, accurate, timely and understandable disclosure in the periodic reports required to be filed by the reporting entity;
(c) Compliance with applicable governmental laws, rules and regulations;
(d) The prompt internal reporting of violations to an appropriate person or persons identified in the code; and
(e) Accountability for adherence to the code.

Yes [X] No []

9.11

If the response to 9.1 is No, please explain:
.....

9.2

Has the code of ethics for senior managers been amended?

Yes [] No [X]

9.21

If the response to 9.2 is Yes, provide information related to amendment(s).
.....

9.3

Have any provisions of the code of ethics been waived for any of the specified officers?

Yes [] No [X]

9.31

If the response to 9.3 is Yes, provide the nature of any waiver(s).
.....

FINANCIAL

10.1

Does the reporting entity report any amounts due from parent, subsidiaries or affiliates on Page 2 of this statement?

Yes [X] No []

10.2

If yes, indicate any amounts receivable from parent included in the Page 2 amount:\$.....0

INVESTMENT

11.1

Were any of the stocks, bonds, or other assets of the reporting entity loaned, placed under option agreement, or otherwise made available for use by another person? (Exclude securities under securities lending agreements.)

Yes [] No [X]

11.2

If yes, give full and complete information relating thereto:
.....

12.

Amount of real estate and mortgages held in other invested assets in Schedule BA:

\$.....

13.

Amount of real estate and mortgages held in short-term investments:

\$.....

14.1

Does the reporting entity have any investments in parent, subsidiaries and affiliates?

Yes [] No [X]

14.2

If yes, please complete the following:

	1 Prior Year-End Book/Adjusted Carrying Value	2 Current Quarter Book/Adjusted Carrying Value
14.21 Bonds	\$.....0	\$.....
14.22 Preferred Stock	\$.....0	\$.....
14.23 Common Stock	\$.....0	\$.....
14.24 Short-Term Investments	\$.....0	\$.....
14.25 Mortgage Loans on Real Estate	\$.....0	\$.....
14.26 All Other	\$.....0	\$.....
14.27 Total Investment in Parent, Subsidiaries and Affiliates (Subtotal Lines 14.21 to 14.26)	\$.....0	\$.....0
14.28 Total Investment in Parent included in Lines 14.21 to 14.26 above	\$.....	\$.....

15.1

Has the reporting entity entered into any hedging transactions reported on Schedule DB?

Yes [] No [X]

15.2

If yes, has a comprehensive description of the hedging program been made available to the domiciliary state? Yes [] No [] N/A [X]
If no, attach a description with this statement.
.....

16.

For the reporting entity's security lending program, state the amount of the following as of the current statement date:

16.1

Total fair value of reinvested collateral assets reported on Schedule DL, Parts 1 and 2.

\$0

16.2

Total book/adjusted carrying value of reinvested collateral assets reported on Schedule DL, Parts 1 and 2

\$0

16.3

Total payable for securities lending reported on the liability page.

\$0

STATEMENT AS OF SEPTEMBER 30, 2024 OF THE AMERICAN COMMERCE INSURANCE COMPANY

GENERAL INTERROGATORIES

17. Excluding items in Schedule E - Part 3 - Special Deposits, real estate, mortgage loans and investments held physically in the reporting entity's offices, vaults or safety deposit boxes, were all stocks, bonds and other securities, owned throughout the current year held pursuant to a custodial agreement with a qualified bank or trust company in accordance with Section 1, III - General Examination Considerations, F. Outsourcing of Critical Functions, Custodial or Safekeeping Agreements of the NAIC Financial Condition Examiners Handbook? Yes [X] No []
- 17.1 For all agreements that comply with the requirements of the NAIC Financial Condition Examiners Handbook, complete the following:

1 Name of Custodian(s)	2 Custodian Address
Bank of New York Mellon	240 Greenwich Street New York, NY 10286

- 17.2 For all agreements that do not comply with the requirements of the NAIC Financial Condition Examiners Handbook, provide the name, location and a complete explanation:

1 Name(s)	2 Location(s)	3 Complete Explanation(s)

- 17.3 Have there been any changes, including name changes, in the custodian(s) identified in 17.1 during the current quarter? Yes [] No [X]
- 17.4 If yes, give full information relating thereto:

1 Old Custodian	2 New Custodian	3 Date of Change	4 Reason

- 17.5 Investment management – Identify all investment advisors, investment managers, broker/dealers, including individuals that have the authority to make investment decisions on behalf of the reporting entity. For assets that are managed internally by employees of the reporting entity, note as such. ["...that have access to the investment accounts"; "...handle securities"]

1 Name of Firm or Individual	2 Affiliation
Eric Trigilio	I.....

- 17.5097 For those firms/individuals listed in the table for Question 17.5, do any firms/individuals unaffiliated with the reporting entity (i.e. designated with a "U") manage more than 10% of the reporting entity's invested assets?..... Yes [] No []

- 17.5098 For firms/individuals unaffiliated with the reporting entity (i.e. designated with a "U") listed in the table for Question 17.5, does the total assets under management aggregate to more than 50% of the reporting entity's invested assets?..... Yes [] No []

- 17.6 For those firms or individuals listed in the table for 17.5 with an affiliation code of "A" (affiliated) or "U" (unaffiliated), provide the information for the table below.

1 Central Registration Depository Number	2 Name of Firm or Individual	3 Legal Entity Identifier (LEI)	4 Registered With	5 Investment Management Agreement (IMA) Filed

- 18.1 Have all the filing requirements of the Purposes and Procedures Manual of the NAIC Investment Analysis Office been followed? Yes [X] No []
- 18.2 If no, list exceptions:
.....

19. By self-designating 5GI securities, the reporting entity is certifying the following elements for each self-designated 5GI security:

a. Documentation necessary to permit a full credit analysis of the security does not exist or an NAIC CRP credit rating for an FE or PL security is not available.
b. Issuer or obligor is current on all contracted interest and principal payments.
c. The insurer has an actual expectation of ultimate payment of all contracted interest and principal.

Has the reporting entity self-designated 5GI securities? Yes [] No [X]

20. By self-designating PLGI securities, the reporting entity is certifying the following elements of each self-designated PLGI security:

a. The security was purchased prior to January 1, 2018.
b. The reporting entity is holding capital commensurate with the NAIC Designation reported for the security.
c. The NAIC Designation was derived from the credit rating assigned by an NAIC CRP in its legal capacity as a NRSRO which is shown on a current private letter rating held by the insurer and available for examination by state insurance regulators.
d. The reporting entity is not permitted to share this credit rating of the PL security with the SVO.

Has the reporting entity self-designated PLGI securities? Yes [] No [X]

21. By assigning FE to a Schedule BA non-registered private fund, the reporting entity is certifying the following elements of each self-designated FE fund:

a. The shares were purchased prior to January 1, 2019.
b. The reporting entity is holding capital commensurate with the NAIC Designation reported for the security.
c. The security had a public credit rating(s) with annual surveillance assigned by an NAIC CRP in its legal capacity as an NRSRO prior to January 1, 2019.
d. The fund only or predominantly holds bonds in its portfolio.
e. The current reported NAIC Designation was derived from the public credit rating(s) with annual surveillance assigned by an NAIC CRP in its legal capacity as an NRSRO.
f. The public credit rating(s) with annual surveillance assigned by an NAIC CRP has not lapsed.

Has the reporting entity assigned FE to Schedule BA non-registered private funds that complied with the above criteria? Yes [] No [X]

GENERAL INTERROGATORIES

PART 2 - PROPERTY & CASUALTY INTERROGATORIES

1.

If the reporting entity is a member of a pooling arrangement, did the agreement or the reporting entity's participation change?
If yes, attach an explanation.
.....

Yes [] No [X] N/A []
2.

Has the reporting entity reinsured any risk with any other reporting entity and agreed to release such entity from liability, in whole or in part, from any loss that may occur on the risk, or portion thereof, reinsured?
If yes, attach an explanation.
.....

Yes [] No [X]
- 3.1

Have any of the reporting entity's primary reinsurance contracts been canceled?

Yes [] No [X]
- 3.2

If yes, give full and complete information thereto.
.....
- 4.1

Are any of the liabilities for unpaid losses and loss adjustment expenses other than certain workers' compensation tabular reserves (see Annual Statement Instructions pertaining to disclosure of discounting for definition of " tabular reserves") discounted at a rate of interest greater than zero?

Yes [] No [X]
- 4.2

If yes, complete the following schedule:

			TOTAL DISCOUNT				DISCOUNT TAKEN DURING PERIOD			
1	2	3	4	5	6	7	8	9	10	11
Line of Business	Maximum Interest	Discount Rate	Unpaid Losses	Unpaid LAE	IBNR	TOTAL	Unpaid Losses	Unpaid LAE	IBNR	TOTAL
TOTAL			0	0	0	0	0	0	0	0

5.

Operating Percentages:
- 5.1

A&H loss percent

%
- 5.2

A&H cost containment percent

%
- 5.3

A&H expense percent excluding cost containment expenses

%
- 6.1

Do you act as a custodian for health savings accounts?

Yes [] No [X]
- 6.2

If yes, please provide the amount of custodial funds held as of the reporting date\$.....
- 6.3

Do you act as an administrator for health savings accounts?

Yes [] No [X]
- 6.4

If yes, please provide the balance of the funds administered as of the reporting date\$.....
7.

Is the reporting entity licensed or chartered, registered, qualified, eligible or writing business in at least two states?

Yes [X] No []
- 7.1

If no, does the reporting entity assume reinsurance business that covers risks residing in at least one state other than the state of domicile of the reporting entity?

Yes [] No []

STATEMENT AS OF SEPTEMBER 30, 2024 OF THE AMERICAN COMMERCE INSURANCE COMPANY

SCHEDULE F - CEDED REINSURANCE

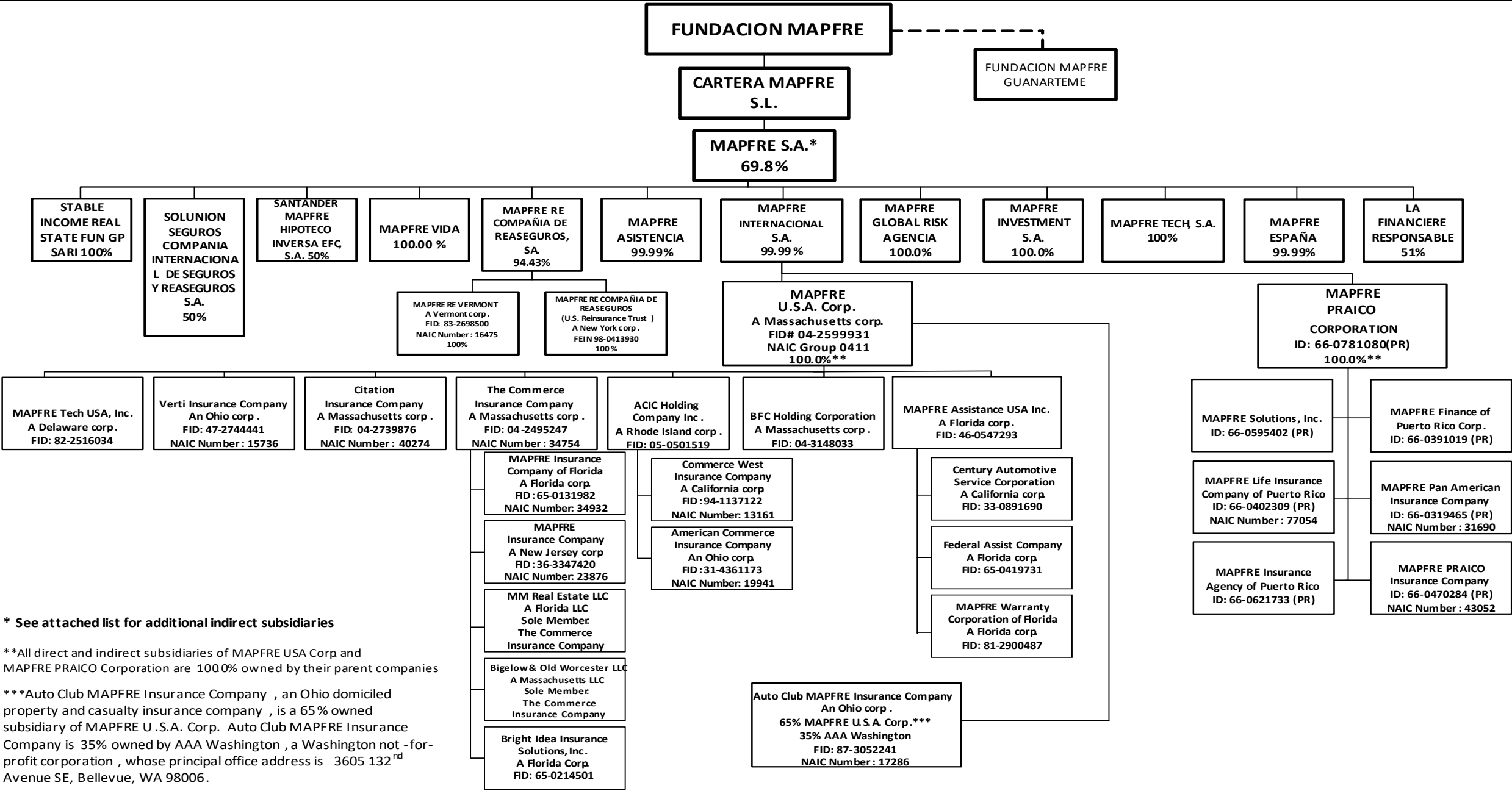
Showing All New Reinsurers - Current Year to Date

[illegible]

SCHEDULE Y – INFORMATION CONCERNING ACTIVITIES OF INSURER MEMBERS OF A HOLDING COMPANY GROUP

PART 1 – ORGANIZATIONAL CHART

11



* See attached list for additional indirect subsidiaries

**All direct and indirect subsidiaries of MAPFRE USA Corp and MAPFRE PRAICO Corporation are 100.0% owned by their parent companies

***Auto Club MAPFRE Insurance Company , an Ohio domiciled property and casualty insurance company , is a 65 % owned subsidiary of MAPFRE U.S.A. Corp. Auto Club MAPFRE Insurance Company is 35% owned by AAA Washington , a Washington not -for-profit corporation , whose principal office address is 3605 132nd Avenue SE, Bellevue, WA 98006.

COMPANY NAME	% OWNED	ULTIMATE CONTROLLING COMPANY
MAPFRE ASISTENCIA COMPAÑÍA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	99.99	MAPFRE, S.A.
AFRIQUE ASSISTANCE, S.A.	49.00	MAPFRE, S.A.
ANDIASISTENCIA COMPAÑÍA DE ASISTENCIA DE LOS ANDES, S.A.S	98.09	MAPFRE, S.A.
ECUASISTENCIA, S.A.	1.00	MAPFRE, S.A.
CARIBE ASISTENCIA, S.A.	83.58	MAPFRE, S.A.
ECUASISTENCIA, S.A.	99.00	MAPFRE, S.A.
EL SALVADOR ASISTENCIA, S.A.	99.99	MAPFRE, S.A.
EUROSOS ASSISTANCE, S.A.	25.00	MAPFRE, S.A.
GENYO SERVIZI E SOLUZIONI S.R.L	50.00	MAPFRE, S.A.
IBERO ASISTENCIA, S.A.	100.00	MAPFRE, S.A.
IBEROASISTENCIA, ARGENTINA S.A.	98.42	MAPFRE, S.A.
IBEROASISTENCIA, S.A.	99.93	MAPFRE, S.A.
ANDIASISTENCIA COMPAÑÍA DE ASISTENCIA DE LOS ANDES, S.A.S	1.91	MAPFRE, S.A.
IBEROASISTENCIA, ARGENTINA S.A.	1.58	MAPFRE, S.A.
INDIA ROADSIDE ASSISTANCE PRIVATE LIMITED	0.37	MAPFRE, S.A.
NILE ASSIST	1.00	MAPFRE, S.A.
PARAGUAY ASISTENCIA CIA. DE SERVICIOS S.A.	1.05	MAPFRE, S.A.
ROADSIDE ASSIST ALGERIE SPA	0.40	MAPFRE, S.A.
SUR ASISTENCIA, S.A.	1.00	MAPFRE, S.A.
URUGUAY ASISTENCIA,S.A.	2.67	MAPFRE, S.A.
EL SALVADOR ASISTENCIA, S.A.	0.01	MAPFRE, S.A.
INDIA ROADSIDE ASSISTANCE PRIVATE LIMITED	99.63	MAPFRE, S.A.
IRELAND ASSIST, LTD	100.00	MAPFRE, S.A.
MAPFRE ASISTENCIA LTDA	99.99	MAPFRE, S.A.
MAPFRE WARRANTY S.P.A.	100.00	MAPFRE, S.A.
MÉXICO ASISTENCIA, S.A.	99.99	MAPFRE, S.A.
MIDDLESEA ASSIST LIMITED	51.00	MAPFRE, S.A.
NICASSIST, S.A.	100.00	MAPFRE, S.A.
NILE ASSIST	98.00	MAPFRE, S.A.
PANAMÁ ASISTENCIA, S.A.	84.00	MAPFRE, S.A.
PARAGUAY ASISTENCIA CIA. DE SERVICIOS S.A.	98.95	MAPFRE, S.A.
QUETZAL ASISTENCIA, S.A.	99.99	MAPFRE, S.A.
ROAD CHINA ASSISTANCE Co, LTD	100.00	MAPFRE, S.A.
ROADSIDE ASSIST ALGERIE SPA	60.30	MAPFRE, S.A.
SERVICIOS GENERALES VENEASISTENCIA, S.A.	99.99	MAPFRE, S.A.
SUR ASISTENCIA, S.A.	99.00	MAPFRE, S.A.
URUGUAY ASISTENCIA,S.A.	97.33	MAPFRE, S.A.
MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS S.A.	99.99	MAPFRE, S.A.
AGROSEGURO	19.23	MAPFRE, S.A.
MAPFRE ASISTENCIA COMPAÑÍA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	0.0030	MAPFRE, S.A.
AUDATEX ESPAÑA, S.A.	12.50	MAPFRE, S.A.
BANKINTER SEGUROS GENERALES, CÍA DE SEGUROS Y REASEGUROS S.A.	50.10	MAPFRE, S.A.
CENTRO DE EXPERIMENTACIÓN Y SEGURIDAD VIAL MAPFRE, S.A.	99.99	MAPFRE, S.A.
CENTROS MÉDICOS MAPFRE, S.A.	100.00	MAPFRE, S.A.
SALUD DIGITAL MAPFRE S.A.	2.50	MAPFRE, S.A.
MULTISERVICIOS MAPFRE MULTIMAP, S.A.	2.50	MAPFRE, S.A.
CLUB MAPFRE, S.A.	99.98	MAPFRE, S.A.
FONDMAPFRE GARANTIA III, F.I.	21.87	MAPFRE, S.A.
FUNESPAÑA, S.A.U.	99.79	MAPFRE, S.A.
ALL FUNERAL SERVICES, S.L.	100.00	MAPFRE, S.A.
FUNESPAÑA CHILE, S.A.	50.00	MAPFRE, S.A.
FUNEUROPA CHILE, S.A.	50.00	MAPFRE, S.A.
TANATORIUM ZRT	100.00	MAPFRE, S.A.
FUNESPAÑA DOS, S.L.	100.00	MAPFRE, S.A.
FUNERARIA ALIANZA CANARIA, S.L.	100.00	MAPFRE, S.A.
CEMENTERIO PARQUE ANDUJAR, S.A.	100.00	MAPFRE, S.A.
DE MENA SERVICIOS FUNERARIOS, S.L.	70.00	MAPFRE, S.A.
EMPRESA MIXTA SERVEIS MUNICIPALS DE TARRAGONA, S.L.	49.00	MAPFRE, S.A.
FUNERARIA SAN VICENTE, S.L.	50.00	MAPFRE, S.A.
FUNERARIAS REUNIDAS DEL BIERZO, S.A.	85.82	MAPFRE, S.A.

INICIATIVAS ALCAÉSAR, S.L.	40.00	MAPFRE, S.A.
ISABELO ALVAREZ MAYORGA, S.A.	50.00	MAPFRE, S.A.
NUEVO TANATORIO, S.L.	50.00	MAPFRE, S.A.
POMPES FÚNEBRES DOMINGO, S.L.	100.00	MAPFRE, S.A.
SALZILLO SERVICIOS FUNERARIOS, S.L.	45.00	MAPFRE, S.A.
SERVICIOS FUNERARIOS DE ZARAGOZA, S.L.	70.00	MAPFRE, S.A.
SERVICIOS FUNERARIOS DEL NERVIÓN, S.L.	50.00	MAPFRE, S.A.
SERVICIOS FUNERARIOS FUNEMADRID, S.A.U.	100.00	MAPFRE, S.A.
CEMENTERIO JARDÍN DE ALCALA DE HENARES, S.A.	49.00	MAPFRE, S.A.
SERVICIOS FUNERARIOS LA CARIDAD, S.L.	50.00	MAPFRE, S.A.
SERVICIOS FUNERARIOS LUCEM S.L.	50.00	MAPFRE, S.A.
TANATORIO DE ÉCIJA, S.L.	33.33	MAPFRE, S.A.
TANATORIO SE-30 SEVILLA, S.L.	10.00	MAPFRE, S.A.
IBEROASISTENCIA, S.A.	0.07	MAPFRE, S.A.
MAPFRE AM- SHORT TERM EURO I	38.87	MAPFRE, S.A.
MAPFRE AM-MULTI ASSET STRATEGY	40.06	MAPFRE, S.A.
MAPFRE AM-US FORGOTTEN VALUE	34.84	MAPFRE, S.A.
MAPFRE AUTOMOCIÓN S.A.U	100.00	MAPFRE, S.A.
CLUB MAPFRE, S.A.	0.0125	MAPFRE, S.A.
VERTI ASEGURADORA, COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A	0.0009	MAPFRE, S.A.
MAPFRE ENERGÍAS RENOVABLES I, F.C.R.	26.49	MAPFRE, S.A.
ENERGÍAS RENOVABLES IBERMAP, S.L.	49.00	MAPFRE, S.A.
MAPFRE INFRAESTRUCTURAS FCR	5.67	MAPFRE, S.A.
MAPFRE PRIVATE DBT, FII	39.63	MAPFRE, S.A.
MAPFRE PRIVATE EQUITY I FCR	31.39	MAPFRE, S.A.
MAPFRE RE COMPAÑÍA DE REASEGUROS, S.A.	0.0003	MAPFRE, S.A.
MAPFRE SEGUROS GERAIS S.A.	100.00	MAPFRE, S.A.
JORNADA ANCESTRAL, S.A.	100.00	MAPFRE, S.A.
MAPFRE SANTANDER PORTUGAL COMPANHIA DE SEGUROS, S.A.	50.01	MAPFRE, S.A.
MAPFRE SEGUROS DE VIDA S.A.	100.00	MAPFRE, S.A.
MEAG EUROPE OFFICE SELECT EOS SCSP SICAV-RIAV	22.50	MAPFRE, S.A.
MEDISEMAP, AGENCIA DE SEGUROS, S.L.	66.67	MAPFRE, S.A.
MULTISERVICIOS MAPFRE MULTIMAP, S.A.	97.50	MAPFRE, S.A.
PUY DU FOU ESPAÑA,S.A.	19.64	MAPFRE, S.A.
SALUD DIGITAL MAPFRE S.A.	97.50	MAPFRE, S.A.
SALVADOR CAETANO AUTO (SGPS), S.A.	24.61	MAPFRE, S.A.
SANTANDER MAPFRE SEGUROS Y REASEGUROS S.A	50.01	MAPFRE, S.A.
SANTANDER ASSURANCE SOLUTIONS, S.A.	33.00	MAPFRE, S.A.
SIEREFF MAPFRE	23.69	MAPFRE, S.A.
OLIFAN INMO 18 OPCI	75.11	MAPFRE, S.A.
SWISSLIFE SPPICAV	49.74	MAPFRE, S.A.
TECNOLOGÍAS DE LA INFORMACIÓN Y REDES PARA LAS ENTIDADES ASEGURADORAS, S.A	22.95	MAPFRE, S.A.
VERTI ASEGURADORA, COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A	99.99	MAPFRE, S.A.
MAPFRE INMUEBLES, S.G.A.	82.97	MAPFRE, S.A.
DESARROLLOS URBANOS CIC. S.A.	99.92	MAPFRE, S.A.
SERVICIOS INMOBILIARIOS MAPFRE S.A.	0.10	
MAP SL EUROPEAN INVEST SARL	50.00	MAPFRE, S.A.
MAPAR IMPERIAL 14, S.L.	100.00	MAPFRE, S.A.
SERVICIOS INMOBILIARIOS MAPFRE S.A.	99.90	MAPFRE, S.A.
MAPFRE INTERNACIONAL S.A.	99.99	MAPFRE, S.A.
MAPFRE USA CORPORATION INC	100.00	MAPFRE, S.A.
ACIC HOLDINGS COMPANY, INC.	100.00	MAPFRE, S.A.
AMERICAN COMMERCE INSURANCE COMPANY	100.00	MAPFRE, S.A.
COMMERCE WEST INSURANCE COMPANY	100.00	MAPFRE, S.A.
AUTO CLUB MAPFRE INSURANCE	65.00	MAPFRE, S.A.
BFC HOLDING CORPORATION	100.00	MAPFRE, S.A.
MAPFRE TECH USA CORPORATION	100.00	MAPFRE, S.A.
CITATION INSURANCE COMPANY	100.00	MAPFRE, S.A.
VERTI INSURANCE COMPANY	100.00	MAPFRE, S.A.
MAPFRE ASSISTANCE USA INC.	100.00	MAPFRE, S.A.
CENTURY AUTOMOTIVE SERVICES COMPANY	100.00	MAPFRE, S.A.
MAPFRE WARRANTY CORPORATION OF FLORIDA	100.00	MAPFRE, S.A.
FEDERAL ASSIST COMPANY	100.00	MAPFRE, S.A.
THE COMMERCE INSURANCE COMPANY	100.00	MAPFRE, S.A.

BIGELOW & OLD WORCESTER, LLC	100.00	MAPFRE, S.A.
MAPFRE INSURANCE COMPANY	100.00	MAPFRE, S.A.
MAPFRE INSURANCE COMPANY OF FLORIDA	100.00	MAPFRE, S.A.
MAPFRE INTERMEDIARIES	100.00	MAPFRE, S.A.
MM REAL ESTATE, LLC	100.00	MAPFRE, S.A.
AMA-ASISTENCIA MEDICA ADMINISTRADA, C.A.	99.70	MAPFRE, S.A.
APOINT S.A.	100.00	MAPFRE, S.A.
MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	6.14	MAPFRE, S.A.
CESVI COLOMBIA, S.A.	67.77	MAPFRE, S.A.
CREDIMAPFRE S.A.	100.00	MAPFRE, S.A.
MAPFRE SERVICIOS EXEQUIALES SAS	100.00	MAPFRE, S.A.
MAPFRE COLOMBIA VIDA SEGUROS S.A.	5.64	MAPFRE, S.A.
GRUPO CORPORATIVO LML S.A. DE C.V.	100.00	MAPFRE, S.A.
MAPFRE MÉXICO S.A.	44.33	MAPFRE, S.A.
MAPFRE COLOMBIA VIDA SEGUROS S.A.	94.35	MAPFRE, S.A.
MAPFRE SIGORTA, A.S.	99.75	MAPFRE, S.A.
GENEL SERVIS YEDEK PARCA DAGITIM TICARET A.S.	51.00	MAPFRE, S.A.
MAPFRE YASAM SIGORTA, A.S.	99.78	MAPFRE, S.A.
MAPFRE AMERICA CENTRAL S.A	99.90	MAPFRE, S.A.
INMOBILIARIA AMERICANA S.A.	78.90	MAPFRE, S.A.
MAPFRE PANAMÁ S.A.	99.37	MAPFRE, S.A.
MAPFRE SEGUROS EL SALVADOR, S.A.	78.11	MAPFRE, S.A.
MAPFRE SEGUROS HONDURAS S.A.	25.10	MAPFRE, S.A.
MAPFRE TENEDORA DE ACC, S.A.	100.00	MAPFRE, S.A.
MAPFRE SEGUROS COSTA RICA S.A.	100.00	MAPFRE, S.A.
MAPFRE SEGUROS GUATEMALA S.A.	100.00	MAPFRE, S.A.
MAPFRE SEGUROS HONDURAS S.A.	73.26	MAPFRE, S.A.
MAPFRE SEGUROS NICARAGUA S.A.	100.00	MAPFRE, S.A.
MAPFRE ARGENTINA HOLDING S.A.	100.00	MAPFRE, S.A.
CLUB MAPFRE ARGENTINA S.A.	97.00	MAPFRE, S.A.
MAPFRE ARGENTINA SEGUROS DE VIDA S.A.	36.00	MAPFRE, S.A.
CLUB MAPFRE ARGENTINA S.A.	3.00	MAPFRE, S.A.
MAPFRE ARGENTINA SEGUROS S.A.	99.99	MAPFRE, S.A.
CESVI ARGENTINA, S.A.	60.64	MAPFRE, S.A.
MAPFRE ARGENTINA SEGUROS DE VIDA S.A.	64.00	MAPFRE, S.A.
MAPFRE ATLAS COMPAÑÍA DE SEGUROS, S.A.	68.55	MAPFRE, S.A.
MAPFRE BRASIL PARTICIPAÇÕES, S.A.	99.17	MAPFRE, S.A.
BB MAPFRE PARTICIPAÇÕES, S.A.	25,0100(*)	MAPFRE, S.A.
ALIANÇA DO BRASIL SEGUROS, S.A.	100.00	MAPFRE, S.A.
BROTO, S.A.	50.00	MAPFRE, S.A.
BRASILSEG COMPANHIA DE SEGUROS S.A.	100.00	MAPFRE, S.A.
MAPFRE ASSISTENCIA LTDA	0.0010	MAPFRE, S.A.
MAPFRE RE DO BRASIL COMPANIA DE REASEGUROS S.A.	0.0001	MAPFRE, S.A.
MAPFRE VERA CRUZ CONSULTORIA E ADMINISTRACAO DE FUNDOS LTDA.	100.00	MAPFRE, S.A.
PROTENSEG CORRETORA DE SEGUROS LTDA	100.00	MAPFRE, S.A.
MAPFRE PARTICIPAÇÕES, S.A.	100.00	MAPFRE, S.A.
MAPFRE CAPITALIZAÇÃO S.A.	100.00	MAPFRE, S.A.
MAPFRE PREVIDENCIA S.A.	100.00	MAPFRE, S.A.
MAPFRE VIDA S.A.	100.00	MAPFRE, S.A.
BANKINTER SEGUROS DE VIDA, S.A. DE SEGUROS Y REAS	50.00	MAPFRE, S.A.
CONSULTORA ACTUARIAL Y DE PENSIONES MAPFRE VIC	99.93	MAPFRE, S.A.
FONDMAPFRE BOLSA MIXTO F.I.	59.30	MAPFRE, S.A.
GESTIÓN MODA SHOPPING S.A.	99.82	MAPFRE, S.A.
MAPFRE AM- IBERIAN EQUITIES	38.91	MAPFRE, S.A.
MAPFRE INMUEBLES, S.G.A.	7.03	MAPFRE, S.A.
MAPFRE INVERSIÓN SOCIEDAD DE VALORES S.A.	99.99	MAPFRE, S.A.
MEDISEMAP, AGENCIA DE SEGUROS, S.L.	33.33	MAPFRE, S.A.
MIRACETI S.A.	99.99	MAPFRE, S.A.
SIEREFF MACQUORIE 2	12.69	MAPFRE, S.A.
STABLE INCOME EUROPEAN REAL ESTATE FUND	19.90	MAPFRE, S.A.
MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	99.99	MAPFRE, S.A.
MAPFRE ASSET MANAGEMENT, S.G.I.I.C., S.A	99.98	MAPFRE, S.A.
MAPFRE VIDA PENSIONES, ENTIDAD GESTORA	99.99	MAPFRE, S.A.
MAPFRE CHILE VIDA, S.A.	100.00	MAPFRE, S.A.

MAPFRE COMPAÑÍA DE SEGUROS DE VIDA DE CHILE S.A.	99.99	MAPFRE, S.A.
MAPFRE COMPAÑÍA DE SEGUROS DE VIDA DE CHILE S.A.	0.0032	MAPFRE, S.A.
MAPFRE DOMINICANA S.A.	99.99	MAPFRE, S.A.
MAPFRE BHD COMPAÑÍA DE SEGUROS, S.A.	51.00	MAPFRE, S.A.
CREDIPRIMAS, S.A.	100.00	MAPFRE, S.A.
MAPFRE DOMINICANA S.A.	0.0001	MAPFRE, S.A.
MAPFRE SALUD ARS	51.00	MAPFRE, S.A.
MAPFRE LA SEGURIDAD C.A. DE SEGUROS	99.51	MAPFRE, S.A.
AUTOMOTRIZ MULTISERVICAR-VENEZUELA, C.A.	97.00	MAPFRE, S.A.
CENTRO DE FORMACION PROFESIONAL SEGUROS LA SEGURIDAD C.A.	100.00	MAPFRE, S.A.
CLUB MAPFRE S.A.	100.00	MAPFRE, S.A.
INVERSORA SEGURIDAD-FINANCIADORA DE PRIMAS, C.A.	100.00	MAPFRE, S.A.
UNIDAD EDUCATIVA D.R FERNANDO BRAVO PEREZ CA	99.70	MAPFRE, S.A.
MAPFRE MÉXICO S.A.	55.66	MAPFRE, S.A.
CESVI MÉXICO, S.A.	16.67	MAPFRE, S.A.
MAPFRE DEFENSA LEGAL S.A. DE C.V.	100.00	MAPFRE, S.A.
MAPFRE FIANZAS S.A.	100.00	MAPFRE, S.A.
MAPFRE SERVICIOS MEXICANOS S.A.	99.99	MAPFRE, S.A.
MAPFRE TEPEYAC INC.	100.00	MAPFRE, S.A.
MAPFRE UNIDAD DE SERVICIOS S.A. DE C.V.	99.99	MAPFRE, S.A.
MAPFRE MIDDLESEA P.L.C.	55.83	MAPFRE, S.A.
BEE INSURANCE MANAGEMENT LTD	100.00	MAPFRE, S.A.
EUROMED RISKS SOLUTIONS LIMITED	100.00	MAPFRE, S.A.
MIDDLESEA ASSIST LIMITED	49.00	MAPFRE, S.A.
CHURCH WARF PROPERTIES	50.00	MAPFRE, S.A.
EURO GLOBE HOLDINGS LIMITED	100.00	MAPFRE, S.A.
MAPFRE M.S.V. LIFE P.L.C.	50.00	MAPFRE, S.A.
CHURCH WARF PROPERTIES	50.00	MAPFRE, S.A.
SIEREFF MACQUORIE 2	15.87	MAPFRE, S.A.
MAPFRE PARAGUAY COMPAÑÍA DE SEGUROS S.A.	89.54	MAPFRE, S.A.
MAPFRE PERÚ COMPAÑÍA DE SEGUROS Y REASEGUROS S.A.	99.59	MAPFRE, S.A.
CORPORACIÓN FUNERARIA, S.A.	100.00	MAPFRE, S.A.
MAPFRE PERÚ ENTIDAD PRESTADORA DE SALUD	100.00	MAPFRE, S.A.
MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	93.85	MAPFRE, S.A.
MAPFRE S.E.M. SA	100.00	
MAPFRE URUGUAY SEGUROS S.A.	100.00	MAPFRE, S.A.
VERTI ASSICURIZIONI S.P.A.	100.00	MAPFRE, S.A.
VERTI VERSICHERUNG AG	100.00	MAPFRE, S.A.
MAPFRE PRAICO CORPORATION	100.00	MAPFRE, S.A.
MAPFRE FINANCE OF PUERTO RICO CORP.	100.00	MAPFRE, S.A.
MAPFRE INSURANCE AGENCY OF PUERTO RICO, INC.	100.00	MAPFRE, S.A.
MAPFRE LIFE INSURANCE COMPANY OF PUERTO RICO	100.00	MAPFRE, S.A.
MAPFRE PAN AMERICAN INSURANCE COMPANY	100.00	MAPFRE, S.A.
MAPFRE PRAICO INSURANCE COMPANY	100.00	MAPFRE, S.A.
MAPFRE SOLUTIONS, INC	100.00	MAPFRE, S.A.
MAPFRE CHILE ASESORÍAS, S.A	0.0001	MAPFRE, S.A.
MAPFRE COMPAÑÍA DE SEGUROS GENERALES DE CHILE S.A.	12.71	MAPFRE, S.A.
MAPFRE CHILE SEGUROS S.A.	100.00	MAPFRE, S.A.
MAPFRE CHILE ASESORÍAS, S.A	99.99	MAPFRE, S.A.
MAPFRE COMPAÑÍA DE SEGUROS GENERALES DE CHILE S.A.	87.29	MAPFRE, S.A.
MAPFRE VIDA SOCIEDAD ANÓNIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	100.00	MAPFRE, S.A.
OTHER GROUP COMPANIES		
MAPFRE AM- IBERIAN EQUITIES	16.29	MAPFRE, S.A.
MAPFRE AM- SHORT TERM EURO I	3.47	MAPFRE, S.A.
MAPFRE AM-MULTI ASSET STRATEGY	12.25	MAPFRE, S.A.
MAPFRE AM-US FORGOTTEN VALUE	9.87	MAPFRE, S.A.
MAPFRE INFRAESTRUCTURAS FCR	19.05	MAPFRE, S.A.
MAPFRE PRIVATE DBT, FII	15.92	MAPFRE, S.A.
STABLE INCOME EUROPEAN REAL ESTATE FUND	8.45	MAPFRE, S.A.
FONDMAPFRE GARANTIA III, F.I.	7.21	MAPFRE, S.A.
MAPFRE PRIVATE EQUITY I FCR	11.03	MAPFRE, S.A.
SIEREFF MAPFRE	19.76	MAPFRE, S.A.
OLIFAN INMO 18 OPC	75.11	MAPFRE, S.A.
SWISSLIFE SPPICAV	49.74	MAPFRE, S.A.

SIEREFF MACQUQRIE 2	19.04	MAPFRE, S.A.
MAPFRE ENERGIAS RENOVABLES I, F.C.R.	27.93	MAPFRE, S.A.
ENERGIAS RENOVABLES IBERMAP, S.L.	49.00	MAPFRE, S.A.
MAPFRE RE COMPAÑÍA DE REASEGUROS, S.A.	94.42	MAPFRE, S.A.
FONDMAPFRE GARANTIA III, F.I.	24.06	MAPFRE, S.A.
INMOBILIARIA PRESIDENTE FIGUEROA ALCORTA, S.A.	99.99	MAPFRE, S.A.
MAPFRE AM- SHORT TERM EURO I	56.65	MAPFRE, S.A.
MAPFRE AM-MULTI ASSET STRATEGY	47.68	MAPFRE, S.A.
MAPFRE AM-US FORGOTTEN VALUE	23.37	MAPFRE, S.A.
MAPFRE CHILE REASEGUROS, S.A.	99.99	MAPFRE, S.A.
C R ARGENTINA, S.A.	99.99	MAPFRE, S.A.
CAJA REASEGURADORA DE CHILE S.A.	99.85	MAPFRE, S.A.
MAPFRE EURO BONDS FUND	100.00	MAPFRE, S.A.
MAPFRE INFRAESTRUCTURAS FCR	6.56	MAPFRE, S.A.
MAPFRE PRIVATE DBT, FII	32.75	MAPFRE, S.A.
MAPFRE PRIVATE EQUITY I FCR	40.60	MAPFRE, S.A.
MAPFRE RE DO BRASIL COMPAÑÍA DE REASEGUROS S.A.	99.99	MAPFRE, S.A.
MAPFRE RE ESCRITORIO DE REPRESENTACION COMPAÑÍA DE REASEGUROS	0.0001	MAPFRE, S.A.
MAPFRE RE ESCRITORIO DE REPRESENTACION COMPAÑÍA DE REASEGUROS	99.99	MAPFRE, S.A.
MAPFRE RE VERMONT CORPORATION	100.00	MAPFRE, S.A.
MAPFRE RE COMPAÑÍA DE REASEGUROS (U.S. REINSURANCE TRUST) (NEW YORK)	100.00	MAPFRE, S.A.
MEAG EUROPE OFFICE SELECT EOS SCSP SICAV-RIAV	22.50	MAPFRE, S.A.
REINSURANCE MANAGAMENT INC.	100.00	MAPFRE, S.A.
RISK MED SOLUTIONS, S.L.	100.00	MAPFRE, S.A.
SERVICIOS GENERALES VENEASISTENCIA, S.A.	0.002	MAPFRE, S.A.
SIEREFF MAPFRE	40.540	MAPFRE, S.A.
OLIFAN INMO 18 OPC	75.110	MAPFRE, S.A.
SWISSLIFE SPPICAV	49.740	MAPFRE, S.A.
STABLE INCOME EUROPEAN REAL ESTATE FUND	16.26	MAPFRE, S.A.
MAPFRE ENERGIAS RENOVABLES I, F.C.R.	25.36	MAPFRE, S.A.
ENERGIAS RENOVABLES IBERMAP, S.L.	49.000	MAPFRE, S.A.
MAPFRE INMUEBLES, S.G.A.	9.998	MAPFRE, S.A.
ALMA MUNDI INSURTECH FUND, FCRE	24.94	MAPFRE, S.A.
ALMA MUNDI INSURTECH II FUND, FCRE	35.47	MAPFRE, S.A.
LA FINANCIERE RESPONSABLE	51.00	MAPFRE, S.A.
MEAG EUROPE OFFICE SELECT EOS SCSP SICAV-RIAV	5.00	MAPFRE, S.A.
SANTANDER MAPFRE HIPOTECA INVERSA EFC, S.A.	50.00	MAPFRE, S.A.
New Company Name: Solunion Seguros Compania Internacional De Seguros Y Reaseguros S.A.	50.00	MAPFRE, S.A.
STABLE INCOME REAL STATE FUN GP S.A.R.I.	100.00	MAPFRE, S.A.
MAPFRE GLOBAL RISK AGENCIA DE SUSCRIPCION	100.00	MAPFRE, S.A.
MAPFRE INTERNACIONAL S.A.	0.0001	MAPFRE, S.A.
MAPFRE INVESTMENT S.A.	100.00	MAPFRE, S.A.
MAPFRE BRASIL PARTICIPAÇÕES, S.A.	0.83	MAPFRE, S.A.
MAPFRE TECH, S.A.	100.00	MAPFRE, S.A.
MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS S.A.	0.0006	MAPFRE, S.A.
ROADSIDE ASSIST ALGERIE SPA	0.3000	MAPFRE, S.A.
CENTRO DE EXPERIMENTACIÓN Y SEGURIDAD VIAL MAPFRE, S.A.	0.0018	MAPFRE, S.A.
CONSULTORA ACTUARIAL Y DE PENSIONES MAPFRE VIDA S.A.	0.06	MAPFRE, S.A.
GESTION MODA SHOPPING S.A.	0.1785	MAPFRE, S.A.
MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	0.0009	MAPFRE, S.A.
MIRACETI, S.A.	0.0009	MAPFRE, S.A.
MAPFRE ASSET MANAGEMENT, S.G.I.C, S.A.	0.0147	MAPFRE, S.A.
MAPFRE VIDA PENSIONES, ENTIDAD GESTORA DE FONDOS DE PENSIONES S.A.	0.0029	MAPFRE, S.A.
DESARROLLOS URBANOS CIC. S.A.	0.07	MAPFRE, S.A.
SERVICIOS INMOBILIARIOS MAPFRE S.A.	0.10	MAPFRE, S.A.

STATEMENT AS OF SEPTEMBER 30, 2024 OF THE AMERICAN COMMERCE INSURANCE COMPANY

SCHEDULE Y
PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries Or Affiliates	Domi-ciliary Location	Relation-ship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership, Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percen-tage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Re-quired? (Yes/No)	*
							SUR ASISTENCIA, S.A.	.CHL.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	.99.000...	MAPFRE S.A.	... NO.....	
							IRELAND ASSIST, LTD	.IRL.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	.100.000...	MAPFRE S.A.	... NO.....	
							EUROSOS ASSISTANCE, S.A.	.GRC.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	.25.000...	MAPFRE S.A.	... NO.....	
							CARIBE ASISTENCIA, S.A.	.DOM.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	.83.582...	MAPFRE S.A.	... NO.....	
							ECUASISTENCIA, S.A.	.ECU.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	.99.000...	MAPFRE S.A.	... NO.....	
							MÉXICO ASISTENCIA, S.A.	.MEX.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	.99.990...	MAPFRE S.A.	... NO.....	
							PANAMÁ ASISTENCIA, S.A.	.PAN.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	.84.000...	MAPFRE S.A.	... NO.....	
							URUGUAY ASISTENCIA,S.A.	.URY.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	.97.332...	MAPFRE S.A.	... NO.....	
							QUETZAL ASISTENCIA, S.A.	.GTM.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	.99.992...	MAPFRE S.A.	... NO.....	
							EL SALVADOR ASISTENCIA, S.A.	.SLV.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	.99.990...	MAPFRE S.A.	... NO.....	
							NICASSIST, S.A.	.NIC.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	.100.000...	MAPFRE S.A.	... NO.....	
							MAPFRE WARRANTY S.P.A.	.ITA.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	.100.000...	MAPFRE S.A.	... NO.....	
							ROAD CHINA ASSISTANCE Co, LTD	.CHN.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	.100.000...	MAPFRE S.A.	... NO.....	
							INDIA ROADSIDE ASSISTANCE PRIVATE LIMITED ...	.IND.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	.99.630...	MAPFRE S.A.	... NO.....	
							ROADSIDE ASSIST ALGERIE SPA	.DZA.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	.60.300...	MAPFRE S.A.	... NO.....	
							NILE ASSIST	.EGY.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	.98.000...	MAPFRE S.A.	... NO.....	
							MIDDLESEA ASSIST LIMITED	.MLT.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	.51.000...	MAPFRE S.A.	... NO.....	
							PARAGUAY ASISTENCIA CIA. DE SERVICIOS S.A.	.PRY.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	.98.950...	MAPFRE S.A.	... NO.....	
							CREDIPRIMAS, S.A.	.DOM.....	NIA.....	MAPFRE BHD COMPAÑIA DE SEGUROS S.A.	Ownership.....	.100.000...	MAPFRE S.A.	... NO.....	
							MAPFRE VERA CRUZ CONSULTORIA E ADMINISTRACAO DE FUNDOS LTDA.	.BRA.....	IA.....	MAPFRE BRASIL PARTICIPAÇÕES, S.A.	Ownership.....	.100.000... 250,100.000	MAPFRE S.A.	... NO.....	
							BB MAPFRE PARTICIPAÇÕES, S.A.	.BRA.....	NIA.....	MAPFRE BRASIL PARTICIPAÇÕES, S.A.	Ownership.....		MAPFRE S.A.	... NO.....	
							MAPFRE PARTICIPAÇÕES, S.A.	.BRA.....	NIA.....	MAPFRE BRASIL PARTICIPAÇÕES, S.A.	Ownership.....	.100.000...	MAPFRE S.A.	... NO.....	
							PROTENSEG CORRETORA DE SEGUROS LTDA	.BRA.....	NIA.....	MAPFRE BRASIL PARTICIPAÇÕES, S.A.	Ownership.....	.100.000...	MAPFRE S.A.	... NO.....	
							MAPFRE COMPAÑIA DE SEGUROS GENERALES DE CHILE S.A.	.CHL.....	IA.....	MAPFRE CHILE ASESORÍAS, S.A.	Ownership.....	.12.710...	MAPFRE S.A.	... NO.....	
							CAJA REASEGURADORA DE CHILE S.A.	.CHL.....	IA.....	MAPFRE CHILE REASEGUROS S.A.	Ownership.....	.99.847...	MAPFRE S.A.	... NO.....	
							C R ARGENTINA, S.A.	.ARG.....	NIA.....	MAPFRE CHILE REASEGUROS S.A.	Ownership.....	.99.996...	MAPFRE S.A.	... NO.....	
							MAPFRE CHILE ASESORÍAS, S.A.	.CHL.....	IA.....	MAPFRE CHILE SEGUROS S.A.	Ownership.....	.99.990...	MAPFRE S.A.	... NO.....	
							MAPFRE COMPAÑIA DE SEGUROS GENERALES DE CHILE S.A.	.CHL.....	IA.....	MAPFRE CHILE SEGUROS S.A.	Ownership.....	.87.290...	MAPFRE S.A.	... NO.....	
							MAPFRE COMPAÑIA DE SEGUROS DE VIDA DE CHILE S.A.	.CHL.....	IA.....	MAPFRE CHILE VIDA S.A.	Ownership.....	.99.997...	MAPFRE S.A.	... NO.....	
							MAPFRE BHD COMPAÑIA DE SEGUROS, S.A.	.DOM.....	NIA.....	MAPFRE DOMINICANA S.A.	Ownership.....	.51.000...	MAPFRE S.A.	... NO.....	
							MAPFRE SALUD ARS	.MEX.....	NIA.....	MAPFRE DOMINICANA S.A.	Ownership.....	.51.000...	MAPFRE S.A.	... NO.....	
							ENERGIAS RENOVABLES IBERMAP, S.L.	.ESP.....	NIA.....	MAPFRE ENERGIAS RENOVABLES I, F.C.R.	Ownership.....	.49.000...	MAPFRE S.A.	... NO.....	
							CENTRO DE EXPERIMENTACIÓN Y SEGURIDAD VIAL MAPFRE, S.A.	.ESP.....	NIA.....	MAPFRE ESPAÑA, S.A.	Ownership.....	.99.998...	MAPFRE S.A.	... NO.....	
							Siereff MAPFRE	.LUX.....	NIA.....	MAPFRE ESPAÑA, S.A.	Ownership.....	.23.690...	MAPFRE S.A.	... NO.....	
							MAPFRE Private DBT, FII	.ESP.....	NIA.....	MAPFRE ESPAÑA, S.A.	Ownership.....	.39.630...	MAPFRE S.A.	... NO.....	
							MAPFRE AUTOMOCIÓN S.A.U	.ESP.....	NIA.....	MAPFRE ESPAÑA, S.A.	Ownership.....	.100.000...	MAPFRE S.A.	... NO.....	
							VERTI ASEGURADORA, COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	.ESP.....	IA.....	MAPFRE ESPAÑA, S.A.	Ownership.....	.99.999...	MAPFRE S.A.	... NO.....	
							FUNESPAÑA, S.A.U.	.ESP.....	NIA.....	MAPFRE ESPAÑA, S.A.	Ownership.....	.99.786...	MAPFRE S.A.	... NO.....	
							MEDISEMAP, AGENCIA DE SEGUROS, S.L.	.ESP.....	NIA.....	MAPFRE ESPAÑA, S.A.	Ownership.....	.66.667...	MAPFRE S.A.	... NO.....	
							CENTROS MÉDICOS MAPFRE, S.A.	.ESP.....	NIA.....	MAPFRE ESPAÑA, S.A.	Ownership.....	.100.000...	MAPFRE S.A.	... NO.....	
							BANKINTER SEGUROS GENERALES, CIA DE SEGUROS Y REASEGUROS S.A.	.ESP.....	IA.....	MAPFRE ESPAÑA, S.A.	Ownership.....	.50.100...	MAPFRE S.A.	... NO.....	

STATEMENT AS OF SEPTEMBER 30, 2024 OF THE AMERICAN COMMERCE INSURANCE COMPANY

SCHEDULE Y
PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries Or Affiliates	Domi-ciliary Location	Relation-ship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership, Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Owner-ship Provide Percen-tage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Re-quired? (Yes/No)	*
							VERTI ASSICURIZIONI S.P.A.	.ITA.....	IA.....	MAPFRE INTERNACIONAL, S.A.	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	
							MAPFRE MIDDLESEA P.L.C.	.MLT.....	IA.....	MAPFRE INTERNACIONAL, S.A.	Ownership.....	55.833 ...	MAPFRE S.A.	... NO.....	
							MAPFRE SIGORTA, A.S.	.TUR.....	IA.....	MAPFRE INTERNACIONAL, S.A.	Ownership.....	99.745 ...	MAPFRE S.A.	... NO.....	
							MAPFRE ASSET MANAGEMENT, S.G.I.I.C., S.A.	.ESP.....	NIA.....	MAPFRE INVERSIÓN, S.A.	Ownership.....	99.985 ...	MAPFRE S.A.	... NO.....	
							MAPFRE VIDA PENSIONES, ENTIDAD GESTORA DE FONDOS DE PENSIONES S.A.	.ESP.....	NIA.....	MAPFRE INVERSIÓN, S.A.	Ownership.....	99.997 ...	MAPFRE S.A.	... NO.....	
							MAPFRE INVERSIONES LTDA.	.BRA.....	NIA.....	MAPFRE BRASIL PARTICIPAÇÕES, S.A.	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	
							MAC INVESTIMENTOS S.A.	.BRA.....	NIA.....	MAPFRE BRASIL PARTICIPAÇÕES, S.A.	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	
							CENTRO DE FORMACION PROFESIONAL SEGUROS LA SEGURIDAD C.A.	.VEN.....	NIA.....	MAPFRE LA SEGURIDAD C.A. DE SEGUROS	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	
							INVERSORA SEGURIDAD-FINANCIADORA DE PRIMAS, C.A.	.VEN.....	NIA.....	MAPFRE LA SEGURIDAD C.A. DE SEGUROS	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	
							CLUB MAPFRE S.A.	.VEN.....	NIA.....	MAPFRE LA SEGURIDAD C.A. DE SEGUROS	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	
							AUTOMOTRIZ MULTISERVICAR-VENEZUELA, C.A.	.VEN.....	NIA.....	MAPFRE LA SEGURIDAD C.A. DE SEGUROS	Ownership.....	97.000 ...	MAPFRE S.A.	... NO.....	
							UNIDAD EDUCATIVA D.R FERNANDO BRAVO PEREZ CA	.VEN.....	NIA.....	MAPFRE LA SEGURIDAD C.A. DE SEGUROS	Ownership.....	99.700 ...	MAPFRE S.A.	... NO.....	
							GROWTH INVESTMENTS LIMITED	.MLT.....	NIA.....	MAPFRE M.S.V. LIFE P.L.C.	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	
							CHURCH WARF PROPERTIES	.MLT.....	NIA.....	MAPFRE M.S.V. LIFE P.L.C.	Ownership.....	50.000 ...	MAPFRE S.A.	... NO.....	
							MAPFRE UNIDAD DE SERVICIOS S.A. DE C.V.	.MEX.....	NIA.....	MAPFRE MEXICO S.A.	Ownership.....	99.998 ...	MAPFRE S.A.	... NO.....	
							MAPFRE DEFENSA LEGAL S.A. DE C.V.	.MEX.....	NIA.....	MAPFRE MEXICO S.A.	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	
							MAPFRE TEPEYAC INC.	.CA.....	NIA.....	MAPFRE MEXICO S.A.	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	
							MAPFRE SERVICIOS MEXICANOS S.A.	.MEX.....	NIA.....	MAPFRE MEXICO S.A.	Ownership.....	99.990 ...	MAPFRE S.A.	... NO.....	
							CESVI MEXICO, S.A.	.MEX.....	NIA.....	MAPFRE MEXICO S.A.	Ownership.....	16.670 ...	MAPFRE S.A.	... NO.....	
							MAPFRE FIANZAS S.A.	.MEX.....	IA.....	MAPFRE MEXICO S.A.	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	
							MAPFRE M.S.V. LIFE P.L.C.	.MLT.....	IA.....	MAPFRE MIDDLESEA INSURANCE P.L.C.	Ownership.....	50.000 ...	MAPFRE S.A.	... NO.....	
							BEE INSURANCE MANAGEMENT LTD	.MLT.....	NIA.....	MAPFRE MIDDLESEA INSURANCE P.L.C.	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	
							CHURCH WARF PROPERTIES	.MLT.....	NIA.....	MAPFRE MIDDLESEA INSURANCE P.L.C.	Ownership.....	50.000 ...	MAPFRE S.A.	... NO.....	
							EURO GLOBE HOLDINGS LIMITED	.MLT.....	NIA.....	MAPFRE MIDDLESEA INSURANCE P.L.C.	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	
							MAPFRE CAPITALIZAÇÃO S.A.	.BRA.....	NIA.....	MAPFRE PARTICIPAÇÕES, S.A.	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	
							MAPFRE VIDA S.A.	.BRA.....	IA.....	MAPFRE PARTICIPAÇÕES, S.A.	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	
							MAPFRE PREVIDENCIA S.A.	.BRA.....	IA.....	MAPFRE PARTICIPAÇÕES, S.A.	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	
							MAPFRE PERÚ COMPAÑÍA DE SEGUROS Y								
							CORPORACIÓN FUNERARIA, S.A.	.PER.....	NIA.....	REASEGUROS S.A.	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	
							Siereff MAPFRE	.LUX.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	40.540 ...	MAPFRE S.A.	... NO.....	
							MAPFRE Private DBT, FII	.ESP.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	32.750 ...	MAPFRE S.A.	... NO.....	
							MAPFRE AM-MULTI ASSET STRATEGY	.ESP.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	47.680 ...	MAPFRE S.A.	... NO.....	
							MAPFRE AM- SHORT TERM EURO I	.LUX.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	56.650 ...	MAPFRE S.A.	... NO.....	
							STABLE INCOME EUROPEAN REAL ESTATE FUND	.LUX.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	16.260 ...	MAPFRE S.A.	... NO.....	
							MAPFRE AM-US FORGOTTEN VALUE	.LUX.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	23.370 ...	MAPFRE S.A.	... NO.....	
							MAPFRE INFRAESTRUCTURAS FCR	.ESP.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	6.560 ...	MAPFRE S.A.	... NO.....	
							MAPFRE PRIVATE EQUITY I FCR	.ESP.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	40.600 ...	MAPFRE S.A.	... NO.....	
							MAPFRE ENERGIAS RENOVABLES I, F.C.R.	.ESP.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	25.360 ...	MAPFRE S.A.	... NO.....	
							FONDUMAPFRE GARANTIA III, F.I.	.ESP.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	24.060 ...	MAPFRE S.A.	... NO.....	
							MEAG EUROPE OFFICE SELECT EOS SCSP SICAV-RIAV	.LUX.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	22.500 ...	MAPFRE S.A.	... NO.....	
							MAPFRE CHILE REASEGUROS, S.A.	.CHL.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	99.990 ...	MAPFRE S.A.	... NO.....	
							MAPFRE RE DO BRASIL COMPAÑÍA DE REASEGUROS S.A.	.BRA.....	IA.....	MAPFRE RE, S.A.	Ownership.....	99.990 ...	MAPFRE S.A.	... NO.....	

STATEMENT AS OF SEPTEMBER 30, 2024 OF THE AMERICAN COMMERCE INSURANCE COMPANY

SCHEDULE Y
PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries Or Affiliates	Domi-ciliary Location	Relation-ship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership, Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percen-tage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Re-quired? (Yes/No)	*
.....							MAPFRE RE ESCRITORIO DE REPRESENTACION COMPAÑIA DE REASEGUROS	.BRA.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	..99.990	MAPFRE S.A.	... NO.....	
.....							INMOBILIARIA PRESIDENTE FIGUEROA ALCORTA, S.A.	.ARG.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	..99.999	MAPFRE S.A.	... NO.....	
.....							REINSURANCE MANAGEMENT INC.	.NJ.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	..100.000	MAPFRE S.A.	... NO.....	
.....							MAPFRE EURO BONDS FUND	.ESP.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	..100.000	MAPFRE S.A.	... NO.....	
.....							RISK MED SOLUTIONS, S.L.	.ESP.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	..100.000	MAPFRE S.A.	... NO.....	
.....							SANTANDER MAPFRE HIPOTECA INVERSA	.ESP.....	NIA.....	MAPFRE S.A.	Ownership.....	..50.000	MAPFRE S.A.	... NO.....	
.....							MEAG EUROPE OFFICE SELECT EOS SCSP SICAV-RIAV	.LUX.....	NIA.....	MAPFRE S.A.	Ownership.....	..5.000	MAPFRE S.A.	... NO.....	
.....							LA FINANCIERE RESPONSABLE	.FRA.....	NIA.....	MAPFRE S.A.	Ownership.....	..51.000	MAPFRE S.A.	... NO.....	
.....							STABLE INCOME REAL STATE FUN GP S.A.R.L.	.LUX.....	NIA.....	MAPFRE S.A.	Ownership.....	..100.000	MAPFRE S.A.	... NO.....	
.....							SOLUNION SEGUROS COMPAÑIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	.ESP.....	IA.....	MAPFRE S.A.	Ownership.....	..50.000	MAPFRE S.A.	... NO.....	
.....							ALMA MUNDI INSURTECH FUND, FCRE	.ESP.....	NIA.....	MAPFRE S.A.	Ownership.....	..24.940	MAPFRE S.A.	... NO.....	
.....							ALMA MUNDI INSURTECH II FUND, FCRE	.ESP.....	NIA.....	MAPFRE S.A.	Ownership.....	..23.850	MAPFRE S.A.	... NO.....	
.....							CREDIMAPFRE S.A.	.COL.....	NIA.....	MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	Ownership.....	..100.000	MAPFRE S.A.	... NO.....	
.....							CESVI COLOMBIA, S.A.	.COL.....	NIA.....	MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	Ownership.....	..67.772	MAPFRE S.A.	... NO.....	
.....							MAPFRE SEGUROS DE VIDA S.A.	.PRT.....	IA.....	MAPFRE SEGUROS GERAIS S.A.	Ownership.....	..100.000	MAPFRE S.A.	... NO.....	
.....							MAPFRE SANTANDER PORTUGAL COMPAÑIA DE SEGUROS, S.A.	.PRT.....	IA.....	MAPFRE SEGUROS GERAIS S.A.	Ownership.....	..50.010	MAPFRE S.A.	... NO.....	
.....							Jornada Ancestral, S.A.	.PRT.....	NIA.....	MAPFRE SEGUROS GERAIS S.A.	Ownership.....	..100.000	MAPFRE S.A.	... NO.....	
.....							MAPFRE YASAM SIGORTA, A.S.	.TUR.....	IA.....	MAPFRE SIGORTA, A.S.	Ownership.....	..99.778	MAPFRE S.A.	... NO.....	
.....							GENEL SERVIS YEDEK PARCA DAGITIM TICARET A.S.	.TUR.....	NIA.....	MAPFRE SIGORTA, A.S.	Ownership.....	..51.000	MAPFRE S.A.	... NO.....	
.....							MAPFRE SEGUROS HONDURAS S.A.	.HND.....	IA.....	MAPFRE TENEDORA DE ACC, S.A.	Ownership.....	..73.257	MAPFRE S.A.	... NO.....	
.....							MAPFRE SEGUROS COSTA RICA S.A.	.CRI.....	IA.....	MAPFRE TENEDORA DE ACC, S.A.	Ownership.....	..100.000	MAPFRE S.A.	... NO.....	
.....							MAPFRE SEGUROS GUATEMALA S.A.	.GTM.....	IA.....	MAPFRE TENEDORA DE ACC, S.A.	Ownership.....	..100.000	MAPFRE S.A.	... NO.....	
.....							MAPFRE SEGUROS NICARAGUA S.A.	.NIC.....	IA.....	MAPFRE TENEDORA DE ACC, S.A.	Ownership.....	..100.000	MAPFRE S.A.	... NO.....	
.....							MEDISEMAP, AGENCIA DE SEGUROS, S.L.	.ESP.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	..33.333	MAPFRE S.A.	... NO.....	
.....							MAPFRE INMUEBLES, S.G.A.	.ESP.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	..7.028	MAPFRE S.A.	... NO.....	
.....							CONSULTORA ACTUARIAL Y DE PENSIONES MAPFRE VIDA S.A.	.ESP.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	..99.934	MAPFRE S.A.	... NO.....	
.....							GESTIÓN MODA SHOPPING S.A.	.ESP.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	..99.822	MAPFRE S.A.	... NO.....	
.....							MAPFRE INVERSIÓN SOCIEDAD DE VALORES S.A.	.ESP.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	..99.999	MAPFRE S.A.	... NO.....	
.....							MIRACETI S.A.	.ESP.....	IA.....	MAPFRE VIDA, S.A.	Ownership.....	..99.999	MAPFRE S.A.	... NO.....	
.....							BANKINTER SEGUROS DE VIDA, S.A. DE SEGUROS Y REASEGUROS	.ESP.....	IA.....	MAPFRE VIDA, S.A.	Ownership.....	..50.000	MAPFRE S.A.	... NO.....	
.....							MAPFRE AM- IBERIAN EQUITIES	.ESP.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	..38.910	MAPFRE S.A.	... NO.....	
.....							FONDMAPFRE BOLSA MIXTO F.I.	.ESP.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	..59.300	MAPFRE S.A.	... NO.....	
.....							STABLE INCOME EUROPEAN REAL ESTATE FUND	.LUX.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	..19.900	MAPFRE S.A.	... NO.....	
.....							SIEREFF MACQUORIE 2	.LUX.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	..12.698	MAPFRE S.A.	... NO.....	
.....							MAPFRE ESPAÑA COMPAÑIA DE SEGUROS Y REASEGUROS S.A.	.ESP.....	IA.....	MAPFRE, S.A.	Ownership.....	..99.990	MAPFRE S.A.	... NO.....	
.....							MAPFRE INMUEBLES, S.G.A.	.ESP.....	NIA.....	MAPFRE, S.A.	Ownership.....	..9.998	MAPFRE S.A.	... NO.....	
.....							MAPFRE TECH, S.A.	.ESP.....	NIA.....	MAPFRE, S.A.	Ownership.....	..100.000	MAPFRE S.A.	... NO.....	
.....							MAPFRE VIDA SOCIEDAD ANÓNIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	.ESP.....	IA.....	MAPFRE, S.A.	Ownership.....	..100.000	MAPFRE S.A.	... NO.....	
.....							MAPFRE ASISTENCIA COMPAÑIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	.ESP.....	IA.....	MAPFRE, S.A.	Ownership.....	..99.997	MAPFRE S.A.	... NO.....	
.....							MAPFRE RE COMPAÑIA DE REASEGUROS, S.A.	.ESP.....	IA.....	MAPFRE, S.A.	Ownership.....	..94.420	MAPFRE S.A.	... NO.....	

STATEMENT AS OF SEPTEMBER 30, 2024 OF THE AMERICAN COMMERCE INSURANCE COMPANY

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

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....							MAPFRE INTERNACIONAL S.A.	.ESP....	UIP.....	MAPFRE, S.A.	Ownership.....	..99.990	MAPFRE, S.A.	NO.....	
....							MAPFRE INVESTMENT S.A.	.URY....	NIA.....	MAPFRE, S.A.	Ownership.....	..100.000	MAPFRE S.A.	NO.....	
....							MAPFRE GLOBAL RISK AGENCIA DE SUSCRIPCION ...	.ESP....	IA.....	MAPFRE, S.A.	Ownership.....	..100.000	MAPFRE S.A.	NO.....	
....							MIDDLESEA ASSIST LIMITED	.MLT....	NIA.....	MIDDLESEA INSURANCE P.L.C.	Ownership.....	..49.000	MAPFRE S.A.	NO.....	
....							SIEREFF MACQUORIE 2	.LUX....	NIA.....	MSV LIFE PLC	Ownership.....	..15.873	MAPFRE S.A.	NO.....	
....							MAPFRE AM- SHORT TERM EURO I	.LUX....	NIA.....	OTHER GROUP COMPANIES	Ownership.....	..3.470	MAPFRE S.A.	NO.....	
....							STABLE INCOME EUROPEAN REAL ESTATE FUND	.LUX....	NIA.....	OTHER GROUP COMPANIES	Ownership.....	..8.450	MAPFRE S.A.	NO.....	
....							MAPFRE AM-US FORGOTTEN VALUE	.LUX....	NIA.....	OTHER GROUP COMPANIES	Ownership.....	..9.870	MAPFRE S.A.	NO.....	
....							SWISSLIFE SPPICAV	.LUX....	NIA.....	SIEREFF MAPFRE	Ownership.....	..49.740	MAPFRE S.A.	NO.....	
....							OLIFAN INMO 18 OPCI	.LUX....	NIA.....	SIEREFF MAPFRE	Ownership.....	..75.100	MAPFRE S.A.	NO.....	
....							MAPFRE INFRAESTRUCTURAS FCR	.ESP....	NIA.....	OTHER GROUP COMPANIES	Ownership.....	..19.050	MAPFRE S.A.	NO.....	
....							MAPFRE SEGUROS GERAIS S.A.	.PRT....	IA.....	MAPFRE ESPAÑA, S.A.	Ownership.....	..100.000	MAPFRE S.A.	NO.....	
....							MAPFRE PRIVATE EQUITY I FCR	.ESP....	NIA.....	OTRAS SOCIEDADES DEL GRUPO	Ownership.....	..11.030	MAPFRE S.A.	NO.....	
....							MAPFRE ENERGIAS RENOVABLES I, F.C.R.	.ESP....	NIA.....	OTRAS SOCIEDADES DEL GRUPO	Ownership.....	..27.930	MAPFRE S.A.	NO.....	
....							FONDIMAPFRE GARANTIA III, F.I.	.ESP....	NIA.....	OTRAS SOCIEDADES DEL GRUPO	Ownership.....	..7.220	MAPFRE S.A.	NO.....	
....							SIEREFF MACQUORIE 2	.LUX....	NIA.....	OTRAS SOCIEDADES DEL GRUPO	Ownership.....	..19.048	MAPFRE S.A.	NO.....	
....							SANTANDER ASSURANCE SOLUTIONS, S.A.	.ESP....	NIA.....	SANTANDER MAPFRE SEGUROS Y REASEGUROS, S.A.	Ownership.....	..33.000	MAPFRE S.A.	NO.....	
....							Siereff MAPFRE	.LUX....	NIA.....	Other Group Companies	Ownership.....	..19.760	MAPFRE S.A.	NO.....	
....							MAPFRE Private DBT, FII	.ESP....	NIA.....	Other Group Companies	Ownership.....	..15.920	MAPFRE S.A.	NO.....	
....							BROTO, S.A.	.BRA....	IA.....	ALIANCA DO BRASIL SEGUROS, S.A.	Ownership.....	..50.000	MAPFRE S.A.	NO.....	

Asterisk	Explanation
1	All direct and indirect subsidiaries of MAPFRE USA Corp. and MAPFRE PRAICO Corporation are 100.0% owned by their parent companies.
2	Auto Club MAPFRE Insurance Company, an Ohio domiciled property and casualty insurance company, is a 65% owned subsidiary of MAPFRE U.S.A. Corp. Auto Club MAPFRE Insurance Company is 35% owned by AAA Washington, a Washington not-for-profit corporation, whose principal office address is 3605 132nd Avenue SE, Bellevue, WA 98006.

PART 1 - LOSS EXPERIENCE

Line of Business		Current Year to Date			4 Prior Year to Date Direct Loss Percentage
		1 Direct Premiums Earned	2 Direct Losses Incurred	3 Direct Loss Percentage	
1.	Fire	2,647,729	(1,007,022)	(38.0)	56.1
2.1	Allied Lines	60,857	39,764	65.3	35.1
2.2	Multiple peril crop	0	0	0.0	0.0
2.3	Federal flood	2,969,277	3,500,504	117.9	13.5
2.4	Private crop	0	0	0.0	0.0
2.5	Private flood	0	0	0.0	0.0
3.	Farmowners multiple peril	0	0	0.0	0.0
4.	Homeowners multiple peril	43,843,572	18,601,690	42.4	67.9
5.1	Commercial multiple peril (non-liability portion)	0	0	0.0	0.0
5.2	Commercial multiple peril (liability portion)	0	0	0.0	0.0
6.	Mortgage guaranty	0	0	0.0	0.0
8.	Ocean marine	0	0	0.0	0.0
9.1	Inland marine	19,499	9,800	50.3	28.8
9.2	Pet insurance	0	0	0.0	0.0
10.	Financial guaranty	0	0	0.0	0.0
11.1	Medical professional liability - occurrence	0	0	0.0	0.0
11.2	Medical professional liability - claims-made	0	0	0.0	0.0
12.	Earthquake	0	0	0.0	0.0
13.1	Comprehensive (hospital and medical) individual	0	0	0.0	0.0
13.2	Comprehensive (hospital and medical) group	0	0	0.0	0.0
14.	Credit accident and health	0	0	0.0	0.0
15.1	Vision only	0	0	0.0	0.0
15.2	Dental only	0	0	0.0	0.0
15.3	Disability income	0	0	0.0	0.0
15.4	Medicare supplement	0	0	0.0	0.0
15.5	Medicaid Title XIX	0	0	0.0	0.0
15.6	Medicare Title XVIII	0	0	0.0	0.0
15.7	Long-term care	0	0	0.0	0.0
15.8	Federal employees health benefits plan	0	0	0.0	0.0
15.9	Other health	0	0	0.0	0.0
16.	Workers' compensation	0	0	0.0	0.0
17.1	Other liability - occurrence	6,101,106	1,244,480	20.4	43.6
17.2	Other liability - claims-made	0	0	0.0	0.0
17.3	Excess workers' compensation	0	0	0.0	0.0
18.1	Products liability - occurrence	0	0	0.0	0.0
18.2	Products liability - claims-made	0	0	0.0	0.0
19.1	Private passenger auto no-fault (personal injury protection)	383,256	37,573	9.8	(3.1)
19.2	Other private passenger auto liability	36,316,435	25,601,778	70.5	75.4
19.3	Commercial auto no-fault (personal injury protection)	0	0	0.0	0.0
19.4	Other commercial auto liability	0	0	0.0	0.0
21.1	Private passenger auto physical damage	26,201,146	15,068,604	57.5	71.8
21.2	Commercial auto physical damage	0	0	0.0	0.0
22.	Aircraft (all perils)	20,335,199	9,092,193	44.7	37.8
23.	Fidelity	0	0	0.0	0.0
24.	Surety	0	0	0.0	0.0
26.	Burglary and theft	0	0	0.0	0.0
27.	Boiler and machinery	0	0	0.0	0.0
28.	Credit	0	0	0.0	0.0
29.	International	0	0	0.0	0.0
30.	Warranty	0	0	0.0	0.0
31.	Reinsurance - Nonproportional Assumed Property	XXX	XXX	XXX	XXX
32.	Reinsurance - Nonproportional Assumed Liability	XXX	XXX	XXX	XXX
33.	Reinsurance - Nonproportional Assumed Financial Lines	XXX	XXX	XXX	XXX
34.	Aggregate write-ins for other lines of business	0	0	0.0	0.0
35.	Totals	138,878,076	72,189,364	52.0	63.8
DETAILS OF WRITE-INS					
3401.					
3402.					
3403.					
3498.	Summary of remaining write-ins for Line 34 from overflow page	0	0	0.0	0.0
3499.	Totals (Lines 3401 through 3403 plus 3498)(Line 34 above)	0	0	0.0	0.0

PART 2 - DIRECT PREMIUMS WRITTEN

Line of Business		1 Current Quarter	2 Current Year to Date	3 Prior Year Year to Date
1.	Fire	886,107	2,594,456	2,780,507
2.1	Allied Lines	26,209	70,631	52,007
2.2	Multiple peril crop	0	0	0
2.3	Federal flood	1,080,536	2,890,075	2,818,075
2.4	Private crop	0	0	0
2.5	Private flood	0	0	0
3.	Farmowners multiple peril	0	0	0
4.	Homeowners multiple peril	16,201,435	46,411,169	42,713,101
5.1	Commercial multiple peril (non-liability portion)	0	0	0
5.2	Commercial multiple peril (liability portion)	0	0	0
6.	Mortgage guaranty	0	0	0
8.	Ocean marine	0	0	0
9.1	Inland marine	7,926	23,289	24,225
9.2	Pet insurance	0	0	0
10.	Financial guaranty	0	0	0
11.1	Medical professional liability - occurrence	0	0	0
11.2	Medical professional liability - claims-made	0	0	0
12.	Earthquake	0	0	0
13.1	Comprehensive (hospital and medical) individual	0	0	0
13.2	Comprehensive (hospital and medical) group	0	0	0
14.	Credit accident and health	0	0	0
15.1	Vision only	0	0	0
15.2	Dental only	0	0	0
15.3	Disability income	0	0	0
15.4	Medicare supplement	0	0	0
15.5	Medicaid Title XIX	0	0	0
15.6	Medicare Title XVIII	0	0	0
15.7	Long-term care	0	0	0
15.8	Federal employees health benefits plan	0	0	0
15.9	Other health	0	0	0
16.	Workers' compensation	0	0	0
17.1	Other liability - occurrence	2,998,614	8,487,801	7,341,060
17.2	Other liability - claims-made	0	0	0
17.3	Excess workers' compensation	0	0	0
18.1	Products liability - occurrence	0	0	0
18.2	Products liability - claims-made	0	0	0
19.1	Private passenger auto no-fault (personal injury protection)	123,065	371,963	439,372
19.2	Other private passenger auto liability	10,797,065	34,674,405	37,928,854
19.3	Commercial auto no-fault (personal injury protection)	0	0	0
19.4	Other commercial auto liability	0	0	0
21.1	Private passenger auto physical damage	8,423,890	26,351,181	25,497,106
21.2	Commercial auto physical damage	0	0	0
22.	Aircraft (all perils)	10,205,534	20,382,303	21,053,443
23.	Fidelity	0	0	0
24.	Surety	0	0	0
26.	Burglary and theft	0	0	0
27.	Boiler and machinery	0	0	0
28.	Credit	0	0	0
29.	International	0	0	0
30.	Warranty	0	0	0
31.	Reinsurance - Nonproportional Assumed Property	XXX	XXX	XXX
32.	Reinsurance - Nonproportional Assumed Liability	XXX	XXX	XXX
33.	Reinsurance - Nonproportional Assumed Financial Lines	XXX	XXX	XXX
34.	Aggregate write-ins for other lines of business	0	0	0
35.	Totals	50,750,381	142,257,273	140,647,750
DETAILS OF WRITE-INS				
3401.				
3402.				
3403.				
3498.	Summary of remaining write-ins for Line 34 from overflow page	0	0	0
3499.	Totals (Lines 3401 through 3403 plus 3498)(Line 34 above)	0	0	0

STATEMENT AS OF SEPTEMBER 30, 2024 OF THE AMERICAN COMMERCE INSURANCE COMPANY

PART 3 (\$000 OMITTED)

LOSS AND LOSS ADJUSTMENT EXPENSE RESERVES SCHEDULE

	1	2	3	4	5	6	7	8	9	10	11	12	13
Years in Which Losses Occurred	Prior Year-End Known Case Loss and LAE Reserves	Prior Year- End IBNR Loss and LAE Reserves	Total Prior Year-End Loss and LAE Reserves (Cols. 1+2)	2024 Loss and LAE Payments on Claims Reported as of Prior Year-End	2024 Loss and LAE Payments on Claims Unreported as of Prior Year-End	Total 2024 Loss and LAE Payments (Cols. 4+5)	Q.S. Date Known Case Loss and LAE Reserves on Claims Reported and Open as of Prior Year End	Q.S. Date Known Case Loss and LAE Reserves on Claims Reported or Reopened Subsequent to Prior Year End	Q.S. Date IBNR Loss and LAE Reserves	Total Q.S. Loss and LAE Reserves (Cols.7+8+9)	Prior Year-End Known Case Loss and LAE Reserves Developed (Savings)/ Deficiency (Cols.4+7 minus Col. 1)	Prior Year-End IBNR Loss and LAE Reserves Developed (Savings)/ Deficiency (Cols. 5+8+9 minus Col. 2)	Prior Year-End Total Loss and LAE Reserve Developed (Savings)/ Deficiency (Cols. 11+12)
1. 2021 + Prior	26,683	(3,668)	23,015	10,167	26	10,193	15,374	66	(2,058)	13,382	(1,142)	1,702	560
2. 2022	25,136	(2,150)	22,986	7,263	7	7,270	17,435	20	(2,236)	15,219	(438)	(59)	(497)
3. Subtotals 2022 + Prior	51,819	(5,818)	46,001	17,430	33	17,463	32,809	86	(4,294)	28,601	(1,580)	1,643	63
4. 2023	40,256	18,214	58,470	28,758	104	28,862	26,512	283	564	27,359	15,014	(17,263)	(2,249)
5. Subtotals 2023 + Prior	92,075	12,396	104,471	46,188	137	46,325	59,321	369	(3,730)	55,960	13,434	(15,620)	(2,186)
6. 2024	XXX	XXX	XXX	XXX	71,108	71,108	XXX	29,243	17,818	47,061	XXX	XXX	XXX
7. Totals	92,075	12,396	104,471	46,188	71,245	117,433	59,321	29,612	14,088	103,021	13,434	(15,620)	(2,186)
8. Prior Year-End Surplus As Regards Policyholders	113,349										Col. 11, Line 7 As % of Col. 1 Line 7	Col. 12, Line 7 As % of Col. 2 Line 7	Col. 13, Line 7 As % of Col. 3 Line 7
											1. 14.6	2. (126.0)	3. (2.1)
											Col. 13, Line 7 As a % of Col. 1 Line 8 4. (1.9)		

STATEMENT AS OF SEPTEMBER 30, 2024 OF THE AMERICAN COMMERCE INSURANCE COMPANY

SUPPLEMENTAL EXHIBITS AND SCHEDULES INTERROGATORIES

The following supplemental reports are required to be filed as part of your statement filing. However, in the event that your company does not transact the type of business for which the special report must be filed, your response of NO to the specific interrogatory will be accepted in lieu of filing a "NONE" report and a bar code will be printed below. If the supplement is required of your company but is not being filed for whatever reason enter SEE EXPLANATION and provide an explanation following the interrogatory questions.

	Response
1. Will the Trusteed Surplus Statement be filed with the state of domicile and the NAIC with this statement?	NO
2. Will Supplement A to Schedule T (Medical Professional Liability Supplement) be filed with this statement?	NO
3. Will the Medicare Part D Coverage Supplement be filed with the state of domicile and the NAIC with this statement?	NO
4. Will the Director and Officer Insurance Coverage Supplement be filed with the state of domicile and the NAIC with this statement?	NO
AUGUST FILING	
5. Will the regulator-only (non-public) Communication of Internal Control Related Matters Noted in Audit be filed with the state of domicile and electronically with the NAIC (as a regulator-only non-public document) by August 1? The response for 1st and 3rd quarters should be N/A. A NO response resulting with a bar code is only appropriate in the 2nd quarter.	N/A

Explanations:

1.
2.
3.
4.

Bar Codes:

1. Trusteed Surplus Statement [Document Identifier 490]
2. Supplement A to Schedule T [Document Identifier 455]
3. Medicare Part D Coverage Supplement [Document Identifier 365]
4. Director and Officer Supplement [Document Identifier 505]



NONE

SCHEDULE A - VERIFICATION

Real Estate

	1 Year to Date	2 Prior Year Ended December 31
1. Book/adjusted carrying value, December 31 of prior year		
2. Cost of acquired:		
2.1 Actual cost at time of acquisition		
2.2 Additional investment made after acquisition		
3. Current year change in encumbrances		
4. Total gain (loss) on disposals		
5. Deduct amounts received on disposals		
6. Total foreign exchange change in book/adjusted carrying value		
7. Deduct current year's other than temporary impairment recognized		
8. Deduct current year's depreciation		
9. Book/adjusted carrying value at the end of current period (Lines 1+2+3+4-5+6-7-8)		
10. Deduct total nonadmitted amounts		
11. Statement value at end of current period (Line 9 minus Line 10)		

SCHEDULE B - VERIFICATION

Mortgage Loans

	1 Year to Date	2 Prior Year Ended December 31
1. Book value/recorded investment excluding accrued interest, December 31 of prior year		
2. Cost of acquired:		
2.1 Actual cost at time of acquisition		
2.2 Additional investment made after acquisition		
3. Capitalized deferred interest and other		
4. Accrual of discount		
5. Unrealized valuation increase/(decrease)		
6. Total gain (loss) on disposals		
7. Deduct amounts received on disposals		
8. Deduct amortization of premium and mortgage interest paid and commitment fees		
9. Total foreign exchange change in book value/recorded investment excluding accrued interest		
10. Deduct current year's other than temporary impairment recognized		
11. Book value/recorded investment excluding accrued interest at end of current period (Lines 1+2+3+4+5+6-7-8+9-10)		
12. Total valuation allowance		
13. Subtotal (Line 11 plus Line 12)		
14. Deduct total nonadmitted amounts		
15. Statement value at end of current period (Line 13 minus Line 14)		

SCHEDULE BA - VERIFICATION

Other Long-Term Invested Assets

	1 Year to Date	2 Prior Year Ended December 31
1. Book/adjusted carrying value, December 31 of prior year		
2. Cost of acquired:		
2.1 Actual cost at time of acquisition		
2.2 Additional investment made after acquisition		
3. Capitalized deferred interest and other		
4. Accrual of discount		
5. Unrealized valuation increase/(decrease)		
6. Total gain (loss) on disposals		
7. Deduct amounts received on disposals		
8. Deduct amortization of premium and depreciation		
9. Total foreign exchange change in book/adjusted carrying value		
10. Deduct current year's other than temporary impairment recognized		
11. Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5+6-7-8+9-10)		
12. Deduct total nonadmitted amounts		
13. Statement value at end of current period (Line 11 minus Line 12)		

SCHEDULE D - VERIFICATION

Bonds and Stocks

	1 Year to Date	2 Prior Year Ended December 31
1. Book/adjusted carrying value of bonds and stocks, December 31 of prior year	201,877,850	192,876,157
2. Cost of bonds and stocks acquired	54,744,648	18,730,145
3. Accrual of discount	170,795	165,285
4. Unrealized valuation increase/(decrease)	571,336	(306,798)
5. Total gain (loss) on disposals	451,199	(350,076)
6. Deduct consideration for bonds and stocks disposed of	44,778,143	8,170,553
7. Deduct amortization of premium	597,383	698,855
8. Total foreign exchange change in book/adjusted carrying value	0	0
9. Deduct current year's other than temporary impairment recognized	50,880	367,455
10. Total investment income recognized as a result of prepayment penalties and/or acceleration fees	0	0
11. Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5-6-7+8-9+10)	212,389,422	201,877,850
12. Deduct total nonadmitted amounts	0	0
13. Statement value at end of current period (Line 11 minus Line 12)	212,389,422	201,877,850

STATEMENT AS OF SEPTEMBER 30, 2024 OF THE AMERICAN COMMERCE INSURANCE COMPANY

SCHEDULE D - PART 1B

Showing the Acquisitions, Dispositions and Non-Trading Activity
During the Current Quarter for all Bonds and Preferred Stock by NAIC Designation

NAIC Designation	1 Book/Adjusted Carrying Value Beginning of Current Quarter	2 Acquisitions During Current Quarter	3 Dispositions During Current Quarter	4 Non-Trading Activity During Current Quarter	5 Book/Adjusted Carrying Value End of First Quarter	6 Book/Adjusted Carrying Value End of Second Quarter	7 Book/Adjusted Carrying Value End of Third Quarter	8 Book/Adjusted Carrying Value December 31 Prior Year
BONDS								
1. NAIC 1 (a)	164,754,180	30,621,056	25,662,113	(118,928)	169,404,881	164,754,180	169,594,195	169,095,392
2. NAIC 2 (a)	27,206,758	7,625,320	3,874,943	(1,814)	28,726,226	27,206,758	30,955,321	29,740,358
3. NAIC 3 (a)	0	0	0	0	0	0	0	
4. NAIC 4 (a)	0	0	0	0	0	0	0	
5. NAIC 5 (a)	0	0	0	0	0	0	0	
6. NAIC 6 (a)	601,250	0	0	(21,250)	630,880	601,250	580,000	630,880
7. Total Bonds	192,562,188	38,246,376	29,537,056	(141,992)	198,761,987	192,562,188	201,129,516	199,466,630
PREFERRED STOCK								
8. NAIC 1	0	0	0	0	0	0	0	0
9. NAIC 2	2,635,200	0	0	(35,760)	2,540,010	2,635,200	2,599,440	2,411,220
10. NAIC 3	0	0	0	0	0	0	0	0
11. NAIC 4	0	0	0	0	0	0	0	0
12. NAIC 5	0	0	0	0	0	0	0	0
13. NAIC 6	0	0	0	0	0	0	0	0
14. Total Preferred Stock	2,635,200	0	0	(35,760)	2,540,010	2,635,200	2,599,440	2,411,220
15. Total Bonds and Preferred Stock	195,197,388	38,246,376	29,537,056	(177,752)	201,301,997	195,197,388	203,728,956	201,877,850

(a) Book/Adjusted Carrying Value column for the end of the current reporting period includes the following amount of short-term and cash equivalent bonds by NAIC designation:
NAIC 1 \$ 5,835,874 ; NAIC 2 \$ 0 ; NAIC 3 \$ 0 NAIC 4 \$ 0 ; NAIC 5 \$ 0 ; NAIC 6 \$ 0

SCHEDULE DA - PART 1

Short-Term Investments

	1	2	3	4	5
	Book/Adjusted Carrying Value	Par Value	Actual Cost	Interest Collected Year-to-Date	Paid for Accrued Interest Year-to-Date
7709999999 Totals	3,860,647	xxx	3,860,647	0	0

SCHEDULE DA - VERIFICATION

Short-Term Investments

	1	2
	Year To Date	Prior Year Ended December 31
1. Book/adjusted carrying value, December 31 of prior year	0	
2. Cost of short-term investments acquired	3,860,647	
3. Accrual of discount	0	
4. Unrealized valuation increase/(decrease)	0	
5. Total gain (loss) on disposals	0	
6. Deduct consideration received on disposals	0	
7. Deduct amortization of premium	0	
8. Total foreign exchange change in book/adjusted carrying value	0	
9. Deduct current year's other than temporary impairment recognized	0	
10. Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5-6-7+8-9)	3,860,647	0
11. Deduct total nonadmitted amounts	0	
12. Statement value at end of current period (Line 10 minus Line 11)	3,860,647	0

Schedule DB - Part A - Verification - Options, Caps, Floors, Collars, Swaps and Forwards

N O N E

Schedule DB - Part B - Verification - Futures Contracts

N O N E

Schedule DB - Part C - Section 1 - Replication (Synthetic Asset) Transactions (RSATs) Open

N O N E

Schedule DB-Part C-Section 2-Reconciliation of Replication (Synthetic Asset) Transactions Open

N O N E

Schedule DB - Verification - Book/Adjusted Carrying Value, Fair Value and Potential Exposure of
Derivatives

N O N E

SCHEDULE E - PART 2 - VERIFICATION

(Cash Equivalents)

	1	2
	Year To Date	Prior Year Ended December 31
1. Book/adjusted carrying value, December 31 of prior year	0	
2. Cost of cash equivalents acquired	1,975,227	
3. Accrual of discount		
4. Unrealized valuation increase/(decrease)		
5. Total gain (loss) on disposals		
6. Deduct consideration received on disposals		
7. Deduct amortization of premium		
8. Total foreign exchange change in book/adjusted carrying value		
9. Deduct current year's other than temporary impairment recognized		
10. Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5-6-7+8-9)	1,975,227	0
11. Deduct total nonadmitted amounts		
12. Statement value at end of current period (Line 10 minus Line 11)	1,975,227	0

Schedule A - Part 2 - Real Estate Acquired and Additions Made

N O N E

Schedule A - Part 3 - Real Estate Disposed

N O N E

Schedule B - Part 2 - Mortgage Loans Acquired and Additions Made

N O N E

Schedule B - Part 3 - Mortgage Loans Disposed, Transferred or Repaid

N O N E

Schedule BA - Part 2 - Other Long-Term Invested Assets Acquired and Additions Made

N O N E

Schedule BA - Part 3 - Other Long-Term Invested Assets Disposed, Transferred or Repaid

N O N E

STATEMENT AS OF SEPTEMBER 30, 2024 OF THE AMERICAN COMMERCE INSURANCE COMPANY

SCHEDULE D - PART 3

Show All Long-Term Bonds and Stock Acquired During the Current Quarter

1	2	3	4	5	6	7	8	9	10
CUSIP Identification	Description	Foreign	Date Acquired	Name of Vendor	Number of Shares of Stock	Actual Cost	Par Value	Paid for Accrued Interest and Dividends	NAIC Designation, NAIC Designation Modifier and SVO Admini- strative Symbol
912810-UB-2	U.S. TREASURY BONDS		08/05/2024	RWBAlRD		5,314,845	5,000,000	52,157	1.A
912810-UD-8	U.S. TREASURY BONDS		09/12/2024	RWBAlRD		5,035,156	5,000,000	16,253	1.A
912810-RH-3	U.S. TREASURY NOTE		09/17/2024	RWBAlRD		4,380,859	5,000,000	14,436	1.A
912820-GE-5	U.S. TREASURY NOTE		07/24/2024	WELLS FARGO SECURITIES, LLC		1,979,922	2,000,000	2,106	1.A
0109999999. Subtotal - Bonds - U.S. Governments						16,710,782	17,000,000	84,952	XXX
574193-WW-4	MARYLAND ST-B-TXBL		07/02/2024	WELLS FARGO SECURITIES LLC.		1,989,980	2,000,000	3,700	1.A FE
0509999999. Subtotal - Bonds - U.S. States, Territories and Possessions						1,989,980	2,000,000	3,700	XXX
45203M-NZ-0	ILLINOIS ST HSG DEV A		08/06/2024	RWBAlRD		2,074,260	2,000,000	40,250	1.A FE
0909999999. Subtotal - Bonds - U.S. Special Revenues						2,074,260	2,000,000	40,250	XXX
49338C-AB-9	KEYSPAN GAS EAST CORP 144A		07/10/2024	RAYMOND JAMES		1,893,400	2,000,000	22,241	2.A FE
571903-BG-7	MARRIOTT INTERNATIONAL		07/31/2024	Loop Capital		1,747,420	2,000,000	16,783	2.B FE
571676-AV-7	MARS INC		07/30/2024	WELLS FARGO SECURITIES LLC.		1,979,740	2,000,000	26,653	1.E FE
824348-BT-2	SHERWIN-WILLIAMS CO		08/07/2024	WELLS FARGO SECURITIES LLC.		1,994,120	2,000,000	0	2.B FE
87264A-AV-7	T-MOBILE USA INC		07/30/2024	J.P. MORGAN		1,990,380	2,000,000	47,500	2.B FE
91324P-FH-0	UNITEDHEALTH GROUP INC		08/01/2024	RAYMOND JAMES		2,030,420	2,000,000	1,925	1.F FE
1109999999. Subtotal - Bonds - Industrial and Miscellaneous (Unaffiliated)						11,635,480	12,000,000	115,102	XXX
2509999997. Total - Bonds - Part 3						32,410,502	33,000,000	244,004	XXX
2509999998. Total - Bonds - Part 5						XXX	XXX	XXX	XXX
2509999999. Total - Bonds						32,410,502	33,000,000	244,004	XXX
4509999997. Total - Preferred Stocks - Part 3						0	XXX	0	XXX
4509999998. Total - Preferred Stocks - Part 5						XXX	XXX	XXX	XXX
4509999999. Total - Preferred Stocks						0	XXX	0	XXX
5989999997. Total - Common Stocks - Part 3						0	XXX	0	XXX
5989999998. Total - Common Stocks - Part 5						XXX	XXX	XXX	XXX
5989999999. Total - Common Stocks						0	XXX	0	XXX
5999999999. Total - Preferred and Common Stocks						0	XXX	0	XXX
6009999999 - Totals						32,410,502	XXX	244,004	XXX

STATEMENT AS OF SEPTEMBER 30, 2024 OF THE AMERICAN COMMERCE INSURANCE COMPANY

SCHEDULE D - PART 4

Show All Long-Term Bonds and Stock Sold, Redeemed or Otherwise Disposed of During the Current Quarter

1	2	3	4	5	6	7	8	9	10	Change In Book/Adjusted Carrying Value					16	17	18	19	20	21	22
										11	12	13	14	15							
CUSIP Ident- ification	Description	For- eign	Disposal Date	Name of Purchaser	Number of Shares of Stock	Consid- eration	Par Value	Actual Cost	Prior Year Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amor- tization)/ Accretion	Current Year's Other Than Temporary Impairment Recogn- ized	Total Change in Book/ Adjusted Carrying Value (11 + 12 - 13)	Total Foreign Exchange Change in Book /Adjusted Carrying Value	Book/ Adjusted Carrying Value at Disposal Date	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Bond Interest/ Stock Dividends Received During Year	Stated Con- tractual Maturity Date	NAIC Desig- nation, NAIC Desig- nation Modifier and SVO Admini- strative Symbol
5989999998. Total - Common Stocks - Part 5						XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX
5989999999. Total - Common Stocks						0	XXX	0	0	0	0	0	0	0	0	0	0	0	0	XXX	XXX
5999999999. Total - Preferred and Common Stocks						0	XXX	0	0	0	0	0	0	0	0	0	0	0	0	XXX	XXX
6009999999 - Totals						29,873,794	XXX	29,601,138	17,192,794	39	(36,196)	0	(36,157)	0	29,537,056	0	336,738	336,738	730,547	XXX	XXX

Schedule DB - Part A - Section 1 - Options, Caps, Floors, Collars, Swaps and Forwards Open

N O N E

Schedule DB - Part B - Section 1 - Futures Contracts Open

N O N E

Schedule DB - Part B - Section 1B - Brokers with whom cash deposits have been made

N O N E

Schedule DB - Part D - Section 1 - Counterparty Exposure for Derivative Instruments Open

N O N E

Schedule DB - Part D-Section 2 - Collateral for Derivative Instruments Open - Pledged By

N O N E

Schedule DB - Part D-Section 2 - Collateral for Derivative Instruments Open - Pledged To

N O N E

Schedule DB - Part E - Derivatives Hedging Variable Annuity Guarantees

N O N E

Schedule DL - Part 1 - Reinvested Collateral Assets Owned

N O N E

Schedule DL - Part 2 - Reinvested Collateral Assets Owned

N O N E

SCHEDULE E - PART 1 - CASH

Month End Depository Balances

1	2	3	4	5	Book Balance at End of Each Month During Current Quarter			9
					6	7	8	
					First Month	Second Month	Third Month	
Depository	Code	Rate of Interest	Amount of Interest Received During Current Quarter	Amount of Interest Accrued at Current Statement Date				*
100 Federal Street, Boston, MA 02111					(6,224,523)	(5,042,090)	(3,943,891)	..XXX.
240 Greenwich Street, New York, NY 10286					1,804,535	18,010	94,372	..XXX.
100 E.Broad St, Columbus, OH 43216					112,766	154,772	193,776	..XXX.
One Financial Center, Boston, MA 02111		5.030	23,219		1,592,977	1,600,001	7,109,194	..XXX.
500 Salem Street, Smithfield, RI 02917		5.090	147,365		11,355,211	4,034,004	6,356,836	..XXX.
0199998. Deposits in ... depositories that do not exceed the allowable limit in any one depository (See instructions) - Open Depositories	XXX	XXX	0	0	0	0	0	XXX
0199999. Totals - Open Depositories	XXX	XXX	170,584	0	8,640,966	764,697	9,810,287	XXX
0299998. Deposits in ... depositories that do not exceed the allowable limit in any one depository (See instructions) - Suspended Depositories	XXX	XXX	0	0	0	0	0	XXX
0299999. Totals - Suspended Depositories	XXX	XXX	0	0	0	0	0	XXX
0399999. Total Cash on Deposit	XXX	XXX	170,584	0	8,640,966	764,697	9,810,287	XXX
0499999. Cash in Company's Office	XXX	XXX	XXX	XXX	0	0	0	XXX
0599999. Total - Cash	XXX	XXX	170,584	0	8,640,966	764,697	9,810,287	XXX

SCHEDULE E - PART 2 - CASH EQUIVALENTS

[illegible]