



PROPERTY AND CASUALTY COMPANIES - ASSOCIATION EDITION

QUARTERLY STATEMENT

AS OF JUNE 30, 2025

OF THE CONDITION AND AFFAIRS OF THE

American Commerce Insurance Company

NAIC Group Code 0411 0411 NAIC Company Code 19941 Employer's ID Number 31-4361173
(Current) (Prior)
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
(Street and Number)
WEBSTER, MA, US 01570-0758, 508-943-9000
(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
(Street and Number)
WEBSTER, MA, US 01570-0758, 508-943-9000
(City or Town, State, Country and Zip Code) (Area Code) (Telephone Number)
Internet Website Address www.mapfreinsurance.com
Statutory Statement Contact CHRISTINE A CONRAD, 508-943-9000-14376
(Name) (Area Code) (Telephone Number)
cconrad@mapfreusa.com, 508-949-4246
(E-mail Address) (FAX Number)

OFFICERS

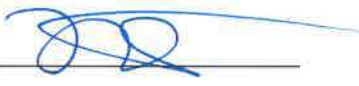
PRESIDENT & CEO	<u>JAIME TAMAYO</u>	TREASURER, CHIEF ACCOUNTING OFFICER & SVP	<u>JOHN MARTIN MECIAK JR.</u>
ACTING GENERAL COUNSEL AND SECRETARY, CHIEF OPERATING OFFICER & EVP	<u>DANIEL PATRICK OLOHAN</u>	CHIEF FINANCIAL OFFICER & EVP	<u>JESUS ALBERTO AMADORI CARRILLO</u>

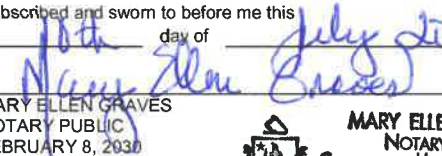
OTHER

DIRECTORS OR TRUSTEES		
<u>RANDALL VAUGHN BECKER</u>	<u>JAIME TAMAYO</u>	<u>DAVID MATTHEW MCMULLEN</u>
<u>TIMOTHY JOHN MORGAN</u>	<u>DANIEL PATRICK OLOHAN</u>	<u>HEATHER MARIE WAHL SNAVELY</u>

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.

 JAIME TAMAYO PRESIDENT & CEO	 DANIEL PATRICK OLOHAN ACTING GENERAL COUNSEL AND SECRETARY, CHIEF OPERATING OFFICER & EVP	 JOHN MARTIN MECIAK, JR. TREASURER, CHIEF ACCOUNTING OFFICER & SVP
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Subscribed and sworn to before me this 10th day of July 2025

MARY ELLEN GRAVES
NOTARY PUBLIC
FEBRUARY 8, 2030



MARY ELLEN GRAVES
NOTARY PUBLIC
Commonwealth of Massachusetts
My Commission Expires
February 8, 2030



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

STATEMENT AS OF JUNE 30, 2025 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	212,340,184		212,340,184	197,535,940
2. Stocks:				
2.1 Preferred stocks	3,053,457		3,053,457	3,087,177
2.2 Common stocks	32,475,383		32,475,383	17,675,240
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 (\$ 10,797,575), cash equivalents (\$ 0) and short-term investments (\$ 0)	10,797,575		10,797,575	16,437,791
6. Contract loans (including \$ premium notes)			0	0
7. Derivatives			0	0
8. Other invested assets	4,104	0	4,104	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)	258,670,703	0	258,670,703	234,736,148
13. Title plants less \$ charged off (for Title insurers only)			0	0
14. Investment income due and accrued	1,758,762		1,758,762	1,613,311
15. Premiums and considerations:				
15.1 Uncollected premiums and agents' balances in the course of collection	27,106,918		27,106,918	25,878,955
15.2 Deferred premiums, agents' balances and installments booked but deferred and not yet due (including \$ earned but unbilled premiums)	16,909,747		16,909,747	14,377,133
15.3 Accrued retrospective premiums (\$) and contracts subject to redetermination (\$)			0	0
16. Reinsurance:				
16.1 Amounts recoverable from reinsurers	7,671,267		7,671,267	11,179,848
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	0
18.2 Net deferred tax asset	3,616,159	121,252	3,494,907	3,578,313
19. Guaranty funds receivable or on deposit			0	0
20. Electronic data processing equipment and software	41,607		41,607	59,453
21. Furniture and equipment, including health care delivery assets (\$)	23,825	23,825	0	0
22. Net adjustment in assets and liabilities due to foreign exchange rates			0	0
23. Receivables from parent, subsidiaries and affiliates	1,297,244		1,297,244	5,575,057
24. Health care (\$) and other amounts receivable			0	0
25. Aggregate write-ins for other than invested assets	73,416,965	866,654	72,550,311	72,629,402
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 to 25)	390,513,197	1,011,731	389,501,466	369,627,620
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts			0	0
28. Total (Lines 26 and 27)	390,513,197	1,011,731	389,501,466	369,627,620
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	866,654	866,654	0	0
2502. Equity in pools and associations	72,026,062		72,026,062	71,332,662
2503. Premium Tax Recoverable	524,249		524,249	1,296,740
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)	73,416,965	866,654	72,550,311	72,629,402

STATEMENT AS OF JUNE 30, 2025 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 \$ 31,531,000)	96,770,925	97,837,916
2. Reinsurance payable on paid losses and loss adjustment expenses	9,842,348	8,046,070
3. Loss adjustment expenses	11,312,545	10,649,436
4. Commissions payable, contingent commissions and other similar charges	3,292,280	2,941,467
5. Other expenses (excluding taxes, licenses and fees)	1,290,132	872,349
6. Taxes, licenses and fees (excluding federal and foreign income taxes)	434,271	409,125
7.1 Current federal and foreign income taxes (including \$ 442,990 on realized capital gains (losses))	1,074,744	1,368,758
7.2 Net deferred tax liability		
8. Borrowed money \$ and interest thereon \$		
9. Unearned premiums (after deducting unearned premiums for ceded reinsurance of \$ 183,638,573 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)	119,238,516	114,894,470
10. Advance premium	3,601,163	1,961,117
11. Dividends declared and unpaid:		
11.1 Stockholders		
11.2 Policyholders		
12. Ceded reinsurance premiums payable (net of ceding commissions)	14,255,103	10,587,806
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	3,375,000	
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	323,372	561,287
26. Total liabilities excluding protected cell liabilities (Lines 1 through 25)	264,810,399	250,129,801
27. Protected cell liabilities		
28. Total liabilities (Lines 26 and 27)	264,810,399	250,129,801
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)	49,750,465	44,557,217
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)	124,691,067	119,497,819
38. Totals (Page 2, Line 28, Col. 3)	389,501,466	369,627,620
DETAILS OF WRITE-INS		
2501. Unclaimed Property	323,372	561,287
2502.		
2503.		
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)	323,372	561,287
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 \$ 99,422,771)	92,640,211	92,129,969	186,867,073
1.2 Assumed (written \$ 113,536,630)	109,192,584	104,620,981	214,005,783
1.3 Ceded (written \$ 99,422,771)	92,640,211	92,129,969	186,867,073
1.4 Net (written \$ 113,536,630)	109,192,584	104,620,981	214,005,783
DEDUCTIONS:			
2. Losses incurred (current accident year \$ 63,819,000):			
2.1 Direct	49,643,060	47,242,413	93,405,228
2.2 Assumed	63,804,658	64,117,157	131,642,165
2.3 Ceded	49,643,060	47,242,413	93,405,228
2.4 Net	63,804,658	64,117,157	131,642,165
3. Loss adjustment expenses incurred	13,178,455	12,686,931	25,593,545
4. Other underwriting expenses incurred	30,430,224	28,995,840	57,701,764
5. Aggregate write-ins for underwriting deductions	0	0	0
6. Total underwriting deductions (Lines 2 through 5)	107,413,337	105,799,928	214,937,474
7. Net income of protected cells			
8. Net underwriting gain (loss) (Line 1 minus Line 6 + Line 7)	1,779,247	(1,178,947)	(931,691)
INVESTMENT INCOME			
9. Net investment income earned	4,077,427	3,431,201	7,663,598
10. Net realized capital gains (losses) less capital gains tax of \$ (442,990)	(489,280)	61,840	(682,700)
11. Net investment gain (loss) (Lines 9 + 10)	3,588,147	3,493,041	6,980,898
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	409,555	413,756	833,593
14. Aggregate write-ins for miscellaneous income	(11,769)	8,512	8,516
15. Total other income (Lines 12 through 14)	397,786	422,268	842,109
16. Net income before dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes (Lines 8 + 11 + 15)	5,765,180	2,736,362	6,891,316
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)	5,765,180	2,736,362	6,891,316
19. Federal and foreign income taxes incurred	1,517,735	617,027	1,557,528
20. Net income (Line 18 minus Line 19)(to Line 22)	4,247,445	2,119,335	5,333,788
CAPITAL AND SURPLUS ACCOUNT			
21. Surplus as regards policyholders, December 31 prior year	119,497,819	113,348,935	113,348,935
22. Net income (from Line 20)	4,247,445	2,119,335	5,333,788
23. Net transfers (to) from Protected Cell accounts			
24. Change in net unrealized capital gains (losses) less capital gains tax of \$ (136,241)	512,530	(192,205)	607,298
25. Change in net unrealized foreign exchange capital gain (loss)			
26. Change in net deferred income tax	(22,054)	123,474	326,542
27. Change in nonadmitted assets	218,328	238,665	538,545
28. Change in provision for reinsurance			0
29. Change in surplus notes			
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	0
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			
37. Aggregate write-ins for gains and losses in surplus	236,999	(233,240)	(657,289)
38. Change in surplus as regards policyholders (Lines 22 through 37)	5,193,248	2,056,029	6,148,884
39. Surplus as regards policyholders, as of statement date (Lines 21 plus 38)	124,691,067	115,404,964	119,497,819
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 (EXPENSE) INCOME	(11,769)	8,512	8,516
1402.			
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)	(11,769)	8,512	8,516
3701. STATUTORY POOLING ADJUSTMENT	236,999	(233,240)	(657,289)
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)	236,999	(233,240)	(657,289)

STATEMENT AS OF JUNE 30, 2025 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	115,083,396	110,902,261	218,712,046
2. Net investment income	4,255,881	3,774,370	8,026,065
3. Miscellaneous income	397,786	422,268	842,109
4. Total (Lines 1 to 3)	119,737,063	115,098,899	227,580,220
5. Benefit and loss related payments	59,566,790	67,313,144	127,287,932
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	41,914,829	41,316,715	82,511,846
8. Dividends paid to policyholders	0	0	0
9. Federal and foreign income taxes paid (recovered) net of \$ tax on capital gains (losses)	1,368,759	(2,402,402)	(2,205,067)
10. Total (Lines 5 through 9)	102,850,378	106,227,457	207,594,711
11. Net cash from operations (Line 4 minus Line 10)	16,886,685	8,871,442	19,985,509
Cash from Investments			
12. Proceeds from investments sold, matured or repaid:			
12.1 Bonds	15,569,537	14,904,349	47,955,461
12.2 Stocks	1,076,723	0	1,178,040
12.3 Mortgage loans	0	0	0
12.4 Real estate	0	0	0
12.5 Other invested assets	1,241	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)	16,647,501	14,904,349	49,133,501
13. Cost of investments acquired (long-term only):			
13.1 Bonds	30,587,581	8,221,084	46,143,670
13.2 Stocks	16,229,265	14,113,062	19,841,889
13.3 Mortgage loans	0	0	0
13.4 Real estate	0	0	0
13.5 Other invested assets	12,831	0	0
13.6 Miscellaneous applications	(3,375,000)	0	0
13.7 Total investments acquired (Lines 13.1 to 13.6)	43,454,677	22,334,146	65,985,559
14. Net increase/(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)	(26,807,176)	(7,429,797)	(16,852,058)
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	0
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)	4,280,275	3,274,140	(428,633)
17. Net cash from financing and miscellaneous sources (Line 16.1 through Line 16.4 minus Line 16.5 plus Line 16.6)	4,280,275	3,274,140	(428,633)
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) .	(5,640,216)	4,715,785	2,704,818
19. Cash, cash equivalents and short-term investments:			
19.1 Beginning of year	16,437,790	13,732,972	13,732,972
19.2 End of period (Line 18 plus Line 19.1)	10,797,574	18,448,757	16,437,790

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 Ohio Department of Insurance. The NAIC Accounting Practices and Procedures manual (NAIC SAP) has been adopted as a component of prescribed or permitted practices by the Ohio Department of Insurance..

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

	SSAP #	F/S Page	F/S Line #		2025		2024
NET INCOME							
(1) State basis (Page 4, Line 20, Columns 1 & 3)	XXX	XXX	XXX	\$	4,247,445	\$	5,333,788
(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	\$	4,247,445	\$	5,333,788
SURPLUS							
(5) State basis (Page 3, Line 37, Columns 1 & 2)	XXX	XXX	XXX	\$	124,691,067	\$	119,497,819
(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	\$	124,691,067	\$	119,497,819

C. Accounting Policy

(2) Basis for Bonds and Amortization Schedule

Bonds, excluding Asset-Backed 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 Asset-Backed Securities and Adjustment Methodology

Asset-Backed Securities are accounted for in accordance with SSAP No. 43. Amortized cost is calculated retrospectively using the scientific interest method. U.S. government agency Asset-Backed Securities are valued at amortized value. Other Asset-Backed 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

In January 2025, American Commerce Insurance Company signed an Investment Management Agreement with Wellington Management Company LLP as referenced in General Interrogatory 17.5. Wellington has discretionary authority to manage, acquire or dispose of equity securities in a way likely to achieve the agreed upon investment objectives. Wellington is currently managing \$29 million of the company's common stock securities.

In May 2025, American Commerce Insurance Company signed an Investment Management Agreement with Conning Inc as referenced in General Interrogatory 17.5. Conning is managing a \$7.5 million portfolio of Collateralized Loan Obligations (CLOs) based upon the agreed guidelines and objectives.

D. Asset-Backed Securities

- (1) Prepayment assumptions for Asset-Backed and Structured Securities were obtained from broker dealer survey values, internal estimates, or Bloomberg.
- (2) The Company did not recognize any Other-Than-Temporary Impairments on Asset-Backed and Structured Securities during the reporting period.
- (3) The Company did not recognize any Other-Than-Temporary Impairments on Asset-Backed and Structured Securities during the reporting period.
- (4) Asset-Backed and Structured Securities in an unrealized loss position as of the reporting period.

a) The aggregate amount of unrealized losses:

1. Less than 12 Months

\$-

NOTES TO FINANCIAL STATEMENTS

2. 12 Months or Longer	\$	1,985,083
b) The aggregate related fair value of securities with unrealized losses:		
1. Less than 12 Months	\$	-
2. 12 Months or Longer	\$	11,360,051

(5) All Asset-Backed 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) Not applicable

F. Repurchase Agreements Transactions Accounted for as Secured Borrowing

Not applicable

G. Reverse Repurchase Agreements Transactions Accounted for as Secured Borrowing

Not applicable

H. Repurchase Agreements Transactions Accounted for as a Sale

Not applicable

I. Reverse Repurchase Agreements Transactions Accounted for as a Sale

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 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

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

K. The Company issued the following surplus debentures or similar obligations:

On December 30, 2022, the Company, with the approval of the Ohio Department of Insurance, issued a \$4,000,000 surplus note to The Commerce Insurance Company "Commerce" an affiliated Massachusetts domiciled property and casualty stock insurance company. Commerce funded the surplus note, by transfer of good and available funds to the Company's account on December 30, 2022. The principal amount outstanding shall be payable to Commerce by the Company in one payment on the maturity date which is January 2, 2026. The Company does have the right to repay all or any part of this Note from time to time without premium or penalty.

STATEMENT AS OF JUNE 30, 2025 OF THE AMERICAN COMMERCE INSURANCE COMPANY

NOTES TO FINANCIAL STATEMENTS

No principal payment will be made without the approval of the Ohio Superintendent of Insurance.

Interest payments are payable on December 31st of each year for any portion of the principal amount that remains outstanding on the maturity date. Each period from January 1st to December 31st are the interest periods. Interest shall be calculated by using the Prime Rate published in the Wall Street Journal on the first business day of the interest period and shall be computed on the basis of a year deemed to consist of 365 days, and shall be paid for the actual number of days elapsed during the interest period. No interest payment will be made without the approval of Ohio Superintendent of Insurance. Payments will be made out of the Company's unassigned surplus, or line 35 of the NAIC property and casualty financial statements, as calculated in accordance with the Statutory Accounting Principles.

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 Liabilites Measured and Reported at Fair Value

(1) Summary of Financial Assets Measured and Reported at Fair Value at reporting date.

Description	(Level 1)	(Level 2)	(Level 3)	Net Asset Value (NAV)	Total
a. Assets at fair value					
Preferred Stock		\$ 2,546,460			\$ 2,546,460
Common Stock	\$ 32,475,383				\$ 32,475,383
Total assets at fair value/NAV	\$ 32,475,383	\$ 2,546,460	\$ -	\$ -	\$ 35,021,843

(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

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. Other Fair Value Disclosures

Not applicable

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

NOTES TO FINANCIAL STATEMENTS

Type of Financial Instrument	Aggregate Fair Value	Admitted Assets	(Level 1)	(Level 2)	(Level 3)	Net Asset Value (NAV)	Not Practicable (Carrying Value)
Bonds	\$ 196,940,045	\$ 212,340,184	\$ 11,476,227	\$ 185,463,818			
Preferred Stock	\$ 3,069,360	\$ 3,053,457		\$ 3,069,360			
Common Stock	\$ 32,475,383	\$ 32,475,383	\$ 32,475,383				
Total	\$ 232,484,788	\$ 247,869,024	\$ 43,951,610	\$ 188,533,178			

D. Not Practicable to Estimate Fair Value

Not applicable

E. Instruments measured at Net Asset Value (NAV)

Not applicable

NOTE 21 Other Items

A. Unusual or Infrequent Items

In January of 2025, a series of wildfires impacted the State of California (CA). The Company, as part of the pooling agreement (the "Pooled Company"), has private passenger auto and limited homeowner exposure in CA. To date, there have been 15 reported claims of which 10 were homeowner which equated to \$3.7M in incurred losses and 5 were private passenger auto which has \$25K in incurred losses. The homeowner claims were covered by the Pooled Company's 65% quota share reinsurance agreement. In addition to its direct exposure, due to its writing in California homeowner business, the Pooled Company was subject to \$897M assessment from the CA FAIR Plan. The Pooled Company's share of the industrywide FAIR Plan assessment for companies that write homeowners business in the state of California was 0.092113%. Additional assessments may be made by the CA FAIR Plan for this event. The Pooled Company is unable to determine what any impact from future assessments will be.

NOTE 22 Events Subsequent

Type I – Recognized Subsequent Events:

Subsequent events have been considered through August 08, 2025 for these statutory financial statements which are to be issued on August 15, 2025.

Type II – Nonrecognized Subsequent Events:

Not applicable

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

A. Change in Incurred Losses and Loss Adjustment Expenses

Current year losses and LAE reflected on the Statement of Income of \$76,983,113 were lower by \$1,584,000 due to favorable development of prior year estimates. This redundancy was 1.5% of the unpaid losses and LAE of \$108,487,352 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 July 15, 2025 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

No significant change

NOTE 34 Subscriber Savings Accounts

No significant change

NOTES TO FINANCIAL STATEMENTS

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 JUNE 30, 2025 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.

12/31/2023
- 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).

05/27/2025
- 6.4

By what department or departments?
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 JUNE 30, 2025 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	2
	Prior Year-End Book/Adjusted Carrying Value	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 JUNE 30, 2025 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. This includes both primary and sub-advisors. 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.....
Wellington Management Co. LLP	U.....
Conning Inc.	U.....

- 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 [X]

- 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 [X]

- 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
106595	Wellington Management Company LLP	549300YHP12TEZNLX41	SEC	NO.....
107423	Conning Inc	549300ZOG14KK37BDV40	SEC	NO.....

- 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 JUNE 30, 2025 OF THE AMERICAN COMMERCE INSURANCE COMPANY

SCHEDULE F - CEDED REINSURANCE

Showing All New Reinsurers - Current Year to Date

[illegible]

SCHEDULE T - EXHIBIT OF PREMIUMS WRITTEN

Current Year to Date - Allocated by States and Territories

States, etc.	1 Active Status (a)	Direct Premiums Written		Direct Losses Paid (Deducting Salvage)		Direct Losses Unpaid		
		2 Current Year To Date	3 Prior Year To Date	4 Current Year To Date	5 Prior Year To Date	6 Current Year To Date	7 Prior Year To Date	
1. Alabama	AL	L	211,488	212,633	10,363	(1,283)	54,450	77,380
2. Alaska	AK	L	123,436	110,664	0	597	49,007	46,658
3. Arizona	AZ	L	407,223	449,198	475,219	138,618	187,652	1,127,363
4. Arkansas	AR	L	201,219	301,807	19,487	198,844	114,074	102,584
5. California	CA	L	994,007	1,003,808	0	0	0	0
6. Colorado	CO	L	21,354	878,977	267,544	356,857	179,680	175,324
7. Connecticut	CT	L	39,044,864	37,414,113	23,052,534	22,192,857	49,325,644	56,876,970
8. Delaware	DE	L	136,380	172,550	3,251	29,249	74,334	61,993
9. District of Columbia	DC	L	66,844	78,546	0	0	18,123	28,446
10. Florida	FL	L	1,156,529	1,220,816	662,021	1,088,525	1,357,074	1,559,938
11. Georgia	GA	L	491,924	465,882	81,899	(42,853)	523,742	390,172
12. Hawaii	HI	L	26,501	29,958	0	10,290	8,822	20,757
13. Idaho	ID	L	2,365,697	2,297,733	1,246,131	1,318,452	2,327,261	3,124,222
14. Illinois	IL	L	713,862	736,293	219,231	269,201	729,267	823,290
15. Indiana	IN	L	283,704	281,039	23,340	15,577	184,933	59,799
16. Iowa	IA	L	1,686,011	326,367	94,283	63,945	44,121	42,656
17. Kansas	KS	L	496,660	496,831	111,202	48,346	4,305,658	274,917
18. Kentucky	KY	L	53,241	63,973	20,892	46,045	38,150	75,217
19. Louisiana	LA	L	157,914	172,182	7,365	3,361	100,581	141,509
20. Maine	ME	L	320,336	371,322	14,764	2,003,673	16,578	9,840
21. Maryland	MD	L	183,996	142,327	116,343	46,867	293,801	139,255
22. Massachusetts	MA	L	2,082,409	1,395,674	215,498	433,115	982,098	313,356
23. Michigan	MI	L	193,070	242,039	88,230	29,511	221,443	227,859
24. Minnesota	MN	L	804,672	507,505	58,098	152,767	139,122	114,847
25. Mississippi	MS	L	54,077	59,271	1,131	0	18,165	16,525
26. Missouri	MO	L	38,685	114,869	0	0	821	3,502
27. Montana	MT	L	122,971	112,635	11,320	80,172	196,027	177,572
28. Nebraska	NE	L	9,947	67,456	1,274,881	137,684	457,078	341,185
29. Nevada	NV	L	338,076	346,997	71,285	5,564	444,191	171,340
30. New Hampshire	NH	L	126,574	145,323	0	77,628	39,252	62,003
31. New Jersey	NJ	L	296,048	340,113	342,171	138,634	530,662	1,040,031
32. New Mexico	NM	L	77,518	134,761	0	7,547	32,663	32,353
33. New York	NY	L	513,104	401,457	197,944	24,397	468,647	402,903
34. North Carolina	NC	L	372,100	416,195	115,175	108,838	302,812	313,217
35. North Dakota	ND	L	22,659	23,578	0	169	35,305	35,461
36. Ohio	OH	L	8,043,702	7,735,545	4,917,993	4,928,967	11,322,654	9,948,965
37. Oklahoma	OK	L	168,920	152,556	29,910	20,356	79,319	143,885
38. Oregon	OR	L	2,103,406	2,304,036	1,185,561	1,474,161	2,970,808	2,676,304
39. Pennsylvania	PA	L	503,831	475,499	51,772	25,227	197,919	169,449
40. Rhode Island	RI	L	23,278,083	21,324,236	11,271,719	14,442,589	21,857,396	24,059,682
41. South Carolina	SC	L	255,448	249,381	30,048	18,358	134,371	162,273
42. South Dakota	SD	L	3,912,572	716,855	308,781	106,901	13,391	19,695
43. Tennessee	TN	L	255,938	285,166	118,315	22,956	221,776	205,084
44. Texas	TX	L	907,604	840,454	139,649	99,479	887,202	869,731
45. Utah	UT	L	198,600	105,409	5,000	9,958	93,176	60,030
46. Vermont	VT	L	117,563	133,221	15,783	562,604	16,850	15,437
47. Virginia	VA	L	337,644	361,686	98,693	176,280	137,968	326,555
48. Washington	WA	L	4,866,106	5,002,851	2,167,728	3,343,211	4,806,055	6,484,402
49. West Virginia	WV	L	9,126	10,097	6,014	3,251	15,116	11,345
50. Wisconsin	WI	L	212,654	232,702	11,247	68,224	144,428	120,284
51. Wyoming	WY	L	56,472	42,307	151,059	1,800	19,303	353,071
52. American Samoa	AS	N	0	0	0	0	0	0
53. Guam	GU	N	0	0	0	0	0	0
54. Puerto Rico	PR	N	0	0	0	0	0	0
55. U.S. Virgin Islands	VI	N	0	0	0	0	0	0
56. Northern Mariana Islands	MP	N	0	0	0	0	0	0
57. Canada	CAN	N	0	0	0	0	0	0
58. Aggregate Other Alien OT	XXX	0	0	0	0	0	0	0
59. Totals	XXX	99,422,770	91,506,892	49,310,872	54,287,515	106,718,971	114,036,633	
DETAILS OF WRITE-INS								
58001.	XXX							
58002.	XXX							
58003.	XXX							
58998. Summary of remaining write-ins for Line 58 from overflow page	XXX	0	0	0	0	0	0	0
58999. Totals (Lines 58001 through 58003 plus 58998)(Line 58 above)	XXX	0	0	0	0	0	0	0

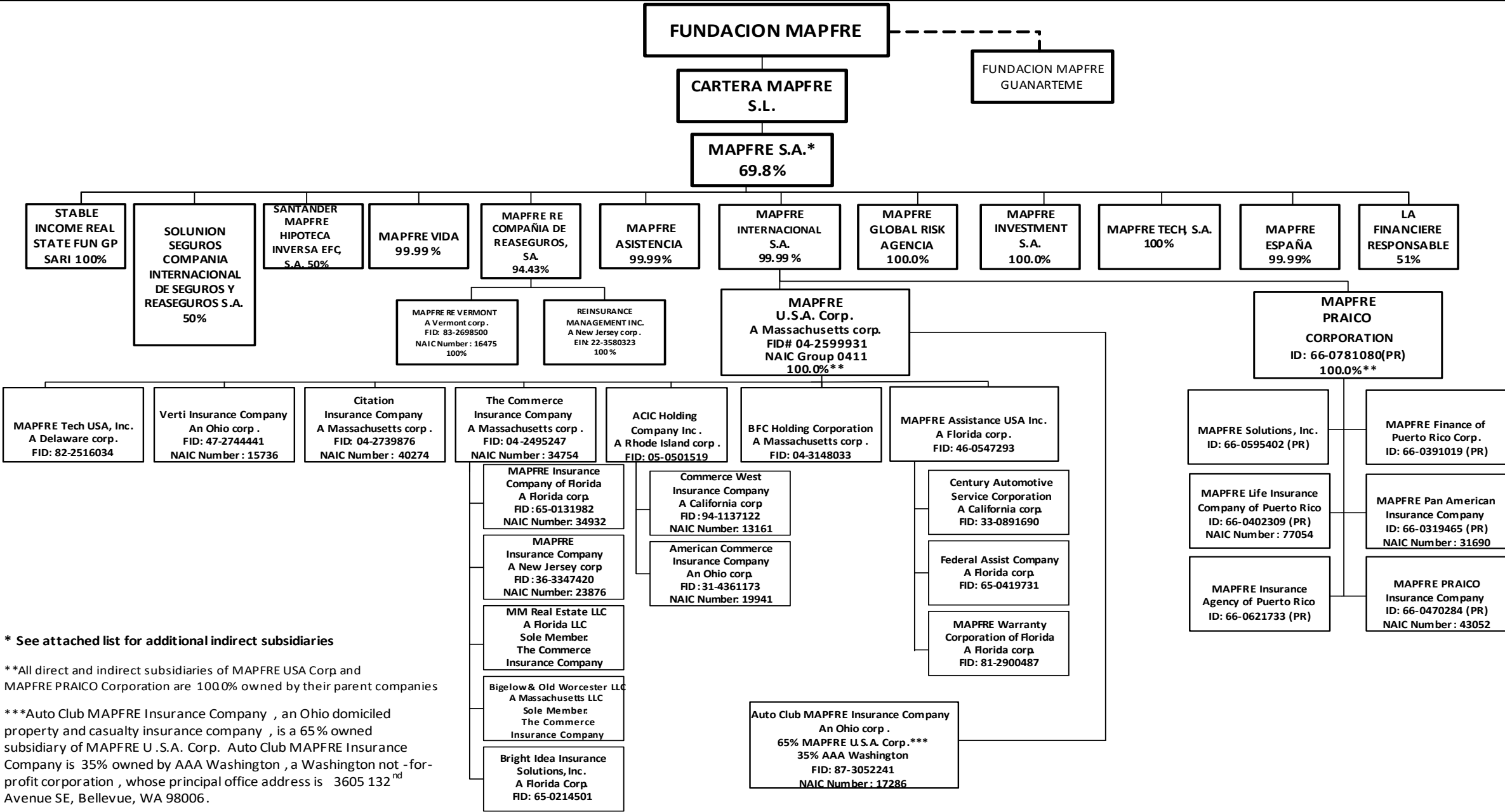
(a) Active Status Counts:

1. L - Licensed or Chartered - Licensed insurance carrier or domiciled RRG.....	51	4. Q - Qualified - Qualified or accredited reinsurer.....	0
2. R - Registered - Non-domiciled RRGs.....	0	5. D - Domestic Surplus Lines Insurer (DSLII) - Reporting entities authorized to write surplus lines in the state of domicile.....	0
3. E - Eligible - Reporting entities eligible or approved to write surplus lines in the state (other than their state of domicile - see DSLII).....	0	6. N - None of the above - Not allowed to write business in the state.....	6

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

PART 1 – ORGANIZATIONAL CHART

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* See attached list for additional indirect subsidiaries

**All direct and indirect subsidiaries of MAPFRE USA Corp and MAPFRE PRAICO Corporation are 100% 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.	99.9970	MAPFRE, S.A.
AFRIQUE ASSISTANCE, S.A.	49.0000	MAPFRE, S.A.
MAWDY, S.A.S.	98.0900	MAPFRE, S.A.
MAWDY S.A.	1.0000	MAPFRE, S.A.
MAWDY, S.A.	83.5823	MAPFRE, S.A.
MAWDY, S.A.	99.0000	MAPFRE, S.A.
MAWDY, S.A. DE C.V	99.9998	MAPFRE, S.A.
GENYO SERVIZI E SOLUZIONI S.R.L	50.0000	MAPFRE, S.A.
MAWDY SERVICES	100.0000	MAPFRE, S.A.
MAWDY, S.A.	98.4200	MAPFRE, S.A.
MAWDY DIGITAL ASSISTANCE SERVICES S.A.	99.9300	MAPFRE, S.A.
MAWDY S.A.S.	1.9100	MAPFRE, S.A.
MAWDY, S.A.	1.5800	MAPFRE, S.A.
INDIA ROADSIDE ASSISTANCE PRIVATE LIMITED	0.3700	MAPFRE, S.A.
NILE ASSIST	1.0000	MAPFRE, S.A.
PARAGUAY ASISTENCIA CIA. DE SERVICIOS S.A.	1.0500	MAPFRE, S.A.
ROADSIDE ASSIST ALGERIE SPA	0.4000	MAPFRE, S.A.
SUR ASISTENCIA, S.A.	1.0000	MAPFRE, S.A.
MAWDY S.A.	2.6683	MAPFRE, S.A.
MAWDY S.A. DE C.V.	0.0100	MAPFRE, S.A.
INDIA ROADSIDE ASSISTANCE PRIVATE LIMITED	99.6300	MAPFRE, S.A.
MAWDY SERVICES LIMITED	100.0000	MAPFRE, S.A.
MAWDY LTDA	99.9900	MAPFRE, S.A.
MAWDY SERVICES S.P.A.	100.0000	MAPFRE, S.A.
MAWDY S.A. DE C.V.	99.9900	MAPFRE, S.A.
MIDDLESEA ASSIST LIMITED	51.0000	MAPFRE, S.A.
NICASSIST, S.A.	100.0000	MAPFRE, S.A.
NILE ASSIST	98.0000	MAPFRE, S.A.
MAWDY S.A.	84.0000	MAPFRE, S.A.
PARAGUAY ASISTENCIA CIA. DE SERVICIOS S.A.	98.9500	MAPFRE, S.A.
MAWDY, S.A.	99.9920	MAPFRE, S.A.
ROADSIDE ASSIST ALGERIE SPA	60.3000	MAPFRE, S.A.
SERVICIOS GENERALES VENEASISTENCIA, S.A.	99.9900	MAPFRE, S.A.
SUR ASISTENCIA, S.A.	99.0000	MAPFRE, S.A.
MAWDY, S.A.	97.3317	MAPFRE, S.A.
MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS S.A.	99.9994	MAPFRE, S.A.
AGROSEGURO	18.3700	MAPFRE, S.A.
MAPFRE ASISTENCIA COMPAÑÍA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	0.0030	MAPFRE, S.A.
AUDATEX ESPAÑA, S.A.	12.5000	MAPFRE, S.A.
BANKINTER SEGUROS GENERALES, CÍA DE SEGUROS Y REASEGUROS S.A.	50.1000	MAPFRE, S.A.
CENTRO DE EXPERIMENTACIÓN Y SEGURIDAD VIAL MAPFRE, S.A.	99.9900	MAPFRE, S.A.
CENTROS MÉDICOS MAPFRE, S.A.	100.0000	MAPFRE, S.A.
SALUD DIGITAL MAPFRE S.A.	2.5000	MAPFRE, S.A.
MULTISERVICIOS MAPFRE MULTIMAP, S.A.	2.5000	MAPFRE, S.A.
CLUB MAPFRE, S.A. (SPAIN)	99.9875	MAPFRE, S.A.
DESARROLLOS HOSPITALARIOS 2024, S.L.	49.9671	MAPFRE, S.A.
FUNESPAÑA, S.A.U.	99.9069	MAPFRE, S.A.
ALL FUNERAL SERVICES, S.L.	100.0000	MAPFRE, S.A.
FUNESPAÑA CHILE, S.A.	50.0000	MAPFRE, S.A.
FUNEUROPA CHILE, S.A.	50.0000	MAPFRE, S.A.
TANATORIUM ZRT	100.0000	MAPFRE, S.A.
FUNESPAÑA DOS, S.L.	100.0000	MAPFRE, S.A.
FUNERARIA ALIANZA CANARIA, S.L.	100.0000	MAPFRE, S.A.
CEMENTERIO PARQUE ANDUJAR, S.A.	100.0000	MAPFRE, S.A.
DE MENA SERVICIOS FUNERARIOS, S.L.	70.0000	MAPFRE, S.A.
EMPRESA MIXTA SERVEIS MUNICIPALS DE TARRAGONA, S.L.	49.0000	MAPFRE, S.A.
FUNERARIA SAN VICENTE, S.L.	50.0000	MAPFRE, S.A.
FUNERARIAS REUNIDAS DEL BIERZO, S.A.	85.8200	MAPFRE, S.A.
INICIATIVAS ALCAÉSAR, S.L.	40.0000	MAPFRE, S.A.
ISABELO ALVAREZ MAYORGA, S.A.	50.0000	MAPFRE, S.A.
NUEVO TANATORIO, S.L.	50.0000	MAPFRE, S.A.
POMPES FÚNEBRES DOMINGO, S.L.	100.0000	MAPFRE, S.A.
SALZILLO SERVICIOS FUNERARIOS, S.L.	45.0000	MAPFRE, S.A.
SERVICIOS FUNERARIOS DE ZARAGOZA, S.L.	70.0000	MAPFRE, S.A.

COMPANY NAME	% OWNED	ULTIMATE CONTROLLING COMPANY
SERVICIOS FUNERARIOS DEL NERVIÓN, S.L.	50.0000	MAPFRE, S.A.
SERVICIOS FUNERARIOS FUNEMADRID, S.A.U.	100.0000	MAPFRE, S.A.
CEMENTERIO JARDÍN DE ALCALA DE HENARES, S.A.	49.0000	MAPFRE, S.A.
SERVICIOS FUNERARIOS LA CARIDAD, S.L.	50.0000	MAPFRE, S.A.
SERVICIOS FUNERARIOS LUCEM S.L.	50.0000	MAPFRE, S.A.
TANATORIO DE ÉCIJA, S.L.	33.3300	MAPFRE, S.A.
TANATORIO SE-30 SEVILLA, S.L.	10.0000	MAPFRE, S.A.
MAWDY DIGITAL ASSISTANCE SERVICES, S.A.	0.0700	MAPFRE, S.A.
MAPFRE AM- SHORT TERM EURO I	40.1788	MAPFRE, S.A.
MAPFRE AM-MULTI ASSET STRATEGY	39.0512	MAPFRE, S.A.
MAPFRE AM-US FORGOTTEN VALUE	30.7042	MAPFRE, S.A.
MAPFRE AUTOMOCIÓN S.A.U	100.0000	MAPFRE, S.A.
CLUB MAPFRE, S.A. (SPAIN)	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.	26.4900	MAPFRE, S.A.
MAPFRE INFRAESTRUCTURAS FCR	5.6700	MAPFRE, S.A.
MAPFRE PRIVATE DBT, FII	31.0710	MAPFRE, S.A.
MAPFRE PRIVATE EQUITY I FCR	28.0800	MAPFRE, S.A.
MAPFRE RE COMPAÑÍA DE REASEGUROS, S.A.	0.0003	MAPFRE, S.A.
MAPFRE SEGUROS GERAIS S.A. (PORTUGAL)	100.0000	MAPFRE, S.A.
JORNADA ANCESTRAL, S.A.	100.0000	MAPFRE, S.A.
MAPFRE SANTANDER PORTUGAL COMPANHIA DE SEGUROS, S.A.	50.0100	MAPFRE, S.A.
MAPFRE SEGUROS DE VIDA S.A.	100.0000	MAPFRE, S.A.
MEAG EUROPE OFFICE SELECT EOS SCSP SICAV-RIAV	22.5000	MAPFRE, S.A.
MEDISEMAP, AGENCIA DE SEGUROS, S.L.	66.6667	MAPFRE, S.A.
MULTISERVICIOS MAPFRE MULTIMAP, S.A.	97.5000	MAPFRE, S.A.
PUY DU FOU ESPAÑA,S.A.	19.8490	MAPFRE, S.A.
SALUD DIGITAL MAPFRE S.A.	97.5000	MAPFRE, S.A.
SALVADOR CAETANO AUTO (SGPS), S.A.	24.6100	MAPFRE, S.A.
SANTANDER MAPFRE SEGUROS Y REASEGUROS S.A	50.0100	MAPFRE, S.A.
SANTANDER ASSURANCE SOLUTIONS, S.A.	33.0000	MAPFRE, S.A.
SIEREF MAPFRE	20.3100	MAPFRE, S.A.
TECNOLOGÍAS DE LA INFORMACIÓN Y REDES PARA LAS ENTIDADES ASEGURADORAS, S.A	22.9506	MAPFRE, S.A.
VERTI ASEGURADORA, COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A	99.9900	MAPFRE, S.A.
MAPFRE INMUEBLES, S.G.A.	82.9732	MAPFRE, S.A.
DESARROLLOS URBANOS CIC. S.A.	99.9216	MAPFRE, S.A.
SERVICIOS INMOBILIARIOS MAPFRE S.A.	0.1000	MAPFRE, S.A.
MAP SL EROPEAN INVEST SARL	43.1600	MAPFRE, S.A.
MAPAR IMPERIAL 14, S.L.	100.0000	MAPFRE, S.A.
SERVICIOS INMOBILIARIOS MAPFRE S.A.	99.9000	MAPFRE, S.A.
MAPFRE INTERNACIONAL S.A.	99.9999	MAPFRE, S.A.
MAPFRE USA CORPORATION INC	100.0000	MAPFRE, S.A.
ACIC HOLDINGS COMPANY, INC.	100.0000	MAPFRE, S.A.
AMERICAN COMMERCE INSURANCE COMPANY	100.0000	MAPFRE, S.A.
COMMERCE WEST INSURANCE COMPANY	100.0000	MAPFRE, S.A.
AUTO CLUB MAPFRE INSURANCE	65.0000	MAPFRE, S.A.
BFC HOLDING CORPORATION	100.0000	MAPFRE, S.A.
MAPFRE TECH USA CORPORATION	100.0000	MAPFRE, S.A.
CITATION INSURANCE COMPANY	100.0000	MAPFRE, S.A.
VERTI INSURANCE COMPANY	100.0000	MAPFRE, S.A.
MAPFRE ASSISTANCE USA INC.	100.0000	MAPFRE, S.A.
CENTURY AUTOMOTIVE SERVICES COMPANY	100.0000	MAPFRE, S.A.
MAPFRE WARRANTY CORPORATION OF FLORIDA	100.0000	MAPFRE, S.A.
FEDERAL ASSIST COMPANY	100.0000	MAPFRE, S.A.
THE COMMERCE INSURANCE COMPANY	100.0000	MAPFRE, S.A.
BIGELOW & OLD WORCESTER, LLC	100.0000	MAPFRE, S.A.
MAPFRE INSURANCE COMPANY	100.0000	MAPFRE, S.A.
MAPFRE INSURANCE COMPANY OF FLORIDA	100.0000	MAPFRE, S.A.
BRIGHT IDEA INSURANCE SOLUTIONS, INC.	100.0000	MAPFRE, S.A.
MM REAL ESTATE, LLC	100.0000	MAPFRE, S.A.
AMA-ASISTENCIA MEDICA ADMINISTRADA, C.A.	99.7000	MAPFRE, S.A.
APOINT S.A.	100.0000	MAPFRE, S.A.
MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	6.1425	MAPFRE, S.A.
CESVI COLOMBIA, S.A.	67.7723	MAPFRE, S.A.

COMPANY NAME	% OWNED	ULTIMATE CONTROLLING COMPANY
CREDIMAPFRE S.A.	100.0000	MAPFRE, S.A.
MAPFRE SERVICIOS EXEQUIALES SAS	100.0000	MAPFRE, S.A.
MAPFRE COLOMBIA VIDA SEGUROS S.A.	5.6400	MAPFRE, S.A.
GRUPO CORPORATIVO LML S.A. DE C.V.	100.0000	MAPFRE, S.A.
PROYECTO INSIGNIA	99.4765	MAPFRE, S.A.
INSIGNIA LIFE	100.0000	MAPFRE, S.A.
MAPFRE MÉXICO S.A.	44.3980	MAPFRE, S.A.
MAPFRE COLOMBIA VIDA SEGUROS S.A.	94.3541	MAPFRE, S.A.
MAPFRE SIGORTA, A.S.	99.7450	MAPFRE, S.A.
MAPFRE AMERICA CENTRAL S.A	99.9000	MAPFRE, S.A.
INMOBILIARIA AMERICANA S.A.	78.9000	MAPFRE, S.A.
MAPFRE PANAMÁ S.A.	99.3700	MAPFRE, S.A.
HOSPITAL GENERAL M.D.S. S.A.	100.0000	MAPFRE, S.A.
MAPFRE SEGUROS EL SALVADOR, S.A.	78.1065	MAPFRE, S.A.
MAPFRE SEGUROS HONDURAS S.A.	25.1031	MAPFRE, S.A.
MAPFRE TENEDORA DE ACC, S.A.	100.0000	MAPFRE, S.A.
MAPFRE SEGUROS COSTA RICA S.A.	100.0000	MAPFRE, S.A.
MAPFRE SEGUROS GUATEMALA S.A.	100.0000	MAPFRE, S.A.
MAPFRE SEGUROS HONDURAS S.A.	73.2569	MAPFRE, S.A.
MAPFRE SEGUROS NICARAGUA S.A.	100.0000	MAPFRE, S.A.
MAPFRE ARGENTINA HOLDING S.A.	100.0000	MAPFRE, S.A.
CLUB MAPFRE ARGENTINA S.A.	97.0000	MAPFRE, S.A.
MAPFRE ARGENTINA SEGUROS DE VIDA S.A.	36.0000	MAPFRE, S.A.
CLUB MAPFRE ARGENTINA S.A.	3.0000	MAPFRE, S.A.
MAPFRE ARGENTINA SEGUROS S.A.	99.9900	MAPFRE, S.A.
CESVI ARGENTINA, S.A.	60.6400	MAPFRE, S.A.
MAPFRE ARGENTINA SEGUROS DE VIDA S.A.	64.0000	MAPFRE, S.A.
MAPFRE ATLAS COMPAÑÍA DE SEGUROS, S.A.	78.6418	MAPFRE, S.A.
MAPFRE BRASIL PARTICIPAÇÕES, S.A.	99.1700	MAPFRE, S.A.
BB MAPFRE PARTICIPAÇÕES, S.A.	25,0100(*)	MAPFRE, S.A.
ALIANÇA DO BRASIL SEGUROS, S.A.	100.0000	MAPFRE, S.A.
BRASILSEG COMPANHIA DE SEGUROS S.A.	100.0000	MAPFRE, S.A.
BROTO, S.A.	50.0000	MAPFRE, S.A.
MAWDY LTDA	0.0010	MAPFRE, S.A.
MAPFRE RE DO BRASIL COMPANIA DE REASEGUROS S.A.	0.0001	MAPFRE, S.A.
MAPFRE INVESTMENTS LTDA	100.0000	MAPFRE, S.A.
MAPFRE VERA CRUZ CONSULTORIA E ADMINISTRACAO DE FUNDOS LTDA.	100.0000	MAPFRE, S.A.
MAC INVESTIMENTOS S.A.	100.0000	MAPFRE, S.A.
PROTENSEG CORRETORA DE SEGUROS LTDA	100.0000	MAPFRE, S.A.
MAPFRE PARTICIPAÇÕES, S.A.	100.0000	MAPFRE, S.A.
MAPFRE CAPITALIZAÇÃO S.A.	100.0000	MAPFRE, S.A.
MAPFRE PREVIDENCIA S.A.	100.0000	MAPFRE, S.A.
MAPFRE SEGUROS GERAIS, S.A. (BRAZIL)	100.0000	MAPFRE, S.A.
MAPFRE VIDA S.A.	100.0000	MAPFRE, S.A.
REASEGUROS	50.0000	MAPFRE, S.A.
VIDA S.A.	99.9339	MAPFRE, S.A.
FONDMAPFRE BOLSA MIXTO F.I.	58.9872	MAPFRE, S.A.
GESTIÓN MODA SHOPPING S.A.	99.8215	MAPFRE, S.A.
MAPFRE AM - EUROPEAN EQUITIES	40.5059	MAPFRE, S.A.
MAPFRE AM- IBERIAN EQUITIES	43.8778	MAPFRE, S.A.
MAPFRE INMUEBLES, S.G.A.	7.0279	MAPFRE, S.A.
MEDISEMAP, AGENCIA DE SEGUROS, S.L.	33.3333	MAPFRE, S.A.
MIRACETI S.A.	99.9991	MAPFRE, S.A.
SIREF MANOVA 2	12.6984	MAPFRE, S.A.
SIREF MANOVA 1	19.9000	MAPFRE, S.A.
MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	99.9991	MAPFRE, S.A.
MAPFRE ASSET MANAGEMENT, S.G.I.I.C., S.A	99.9853	MAPFRE, S.A.
SOCIAL FUND	100.0000	MAPFRE, S.A.
DE FONDOS DE PENSIONES S.A.	99.9971	MAPFRE, S.A.
MAPFRE CHILE VIDA, S.A.	100.0000	MAPFRE, S.A.
MAPFRE COMPAÑÍA DE SEGUROS DE VIDA DE CHILE S.A.	99.9900	MAPFRE, S.A.
MAPFRE COMPAÑÍA DE SEGUROS DE VIDA DE CHILE S.A.	0.0032	MAPFRE, S.A.
MAPFRE DOMINICANA S.A.	99.9999	MAPFRE, S.A.
MAPFRE BHD COMPAÑÍA DE SEGUROS, S.A.	51.0000	MAPFRE, S.A.

COMPANY NAME	% OWNED	ULTIMATE CONTROLLING COMPANY
CREDIPRIMAS, S.A.	100.0000	MAPFRE, S.A.
MAPFRE DOMINICANA S.A.	0.0001	MAPFRE, S.A.
MAPFRE SALUD ARS	51.0000	MAPFRE, S.A.
MAPFRE LA SEGURIDAD C.A. DE SEGUROS	99.5159	MAPFRE, S.A.
AUTOMOTRIZ MULTISERVICAR-VENEZUELA, C.A.	97.0000	MAPFRE, S.A.
CENTRO DE FORMACION PROFESIONAL SEGUROS LA SEGURIDAD C.A.	100.0000	MAPFRE, S.A.
CLUB MAPFRE S.A. (VENEZUELA)	100.0000	MAPFRE, S.A.
INVERSORA SEGURIDAD-FINANCIADORA DE PRIMAS, C.A.	100.0000	MAPFRE, S.A.
UNIDAD EDUCATIVA D.R FERNANDO BRAVO PEREZ CA	99.7000	MAPFRE, S.A.
MAPFRE MÉXICO S.A.	55.6602	MAPFRE, S.A.
CESVI MÉXICO, S.A.	16.6700	MAPFRE, S.A.
MAPFRE DEFENSA LEGAL S.A. DE C.V.	100.0000	MAPFRE, S.A.
MAPFRE FIANZAS S.A.	100.0000	MAPFRE, S.A.
MAPFRE SERVICIOS MEXICANOS S.A.	99.9900	MAPFRE, S.A.
MAPFRE TEPEYAC INC.	100.0000	MAPFRE, S.A.
MAPFRE UNIDAD DE SERVICIOS S.A. DE C.V.	99.9982	MAPFRE, S.A.
MAPFRE MIDDLESEA P.L.C.	55.8325	MAPFRE, S.A.
BEE INSURANCE MANAGEMENT LTD	100.0000	MAPFRE, S.A.
EUROMED RISKS SOLUTIONS LIMITED	100.0000	MAPFRE, S.A.
MIDDLESEA ASSIST LIMITED	49.0000	MAPFRE, S.A.
CHURCH WARF PROPERTIES	50.0000	MAPFRE, S.A.
EURO GLOBE HOLDINGS LIMITED	100.0000	MAPFRE, S.A.
MAPFRE M.S.V. LIFE P.L.C.	50.0000	MAPFRE, S.A.
CHURCH WARF PROPERTIES	50.0000	MAPFRE, S.A.
SIEREF MANOVA 2	15.8730	MAPFRE, S.A.
MAPFRE PARAGUAY COMPAÑÍA DE SEGUROS S.A.	89.5400	MAPFRE, S.A.
MAPFRE PERÚ COMPAÑÍA DE SEGUROS Y REASEGUROS S.A.	99.5900	MAPFRE, S.A.
CORPORACIÓN FUNERARIA, S.A.	100.0000	MAPFRE, S.A.
MAPFRE PERÚ ENTIDAD PRESTADORA DE SALUD	100.0000	MAPFRE, S.A.
MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	93.8525	MAPFRE, S.A.
MAPFRE S.E.M. SA	100.0000	MAPFRE, S.A.
MAPFRE URUGUAY SEGUROS S.A.	100.0000	MAPFRE, S.A.
VERTI ASSICURIZIONI S.P.A.	99.9980	MAPFRE, S.A.
VERTI VERSICHERUNG AG	100.0000	MAPFRE, S.A.
MAPFRE PRAICO CORPORATION	100.0000	MAPFRE, S.A.
MAPFRE FINANCE OF PUERTO RICO CORP.	100.0000	MAPFRE, S.A.
MAPFRE INSURANCE AGENCY OF PUERTO RICO, INC.	100.0000	MAPFRE, S.A.
MAPFRE LIFE INSURANCE COMPANY OF PUERTO RICO	100.0000	MAPFRE, S.A.
MAPFRE PAN AMERICAN INSURANCE COMPANY	100.0000	MAPFRE, S.A.
MAPFRE PRAICO INSURANCE COMPANY	100.0000	MAPFRE, S.A.
MAPFRE SOLUTIONS, INC	100.0000	MAPFRE, S.A.
MAPFRE CHILE ASESORÍAS, S.A	0.0001	MAPFRE, S.A.
MAPFRE COMPAÑÍA DE SEGUROS GENERALES DE CHILE S.A.	12.7100	MAPFRE, S.A.
MAPFRE CHILE SEGUROS S.A.	100.0000	MAPFRE, S.A.
MAPFRE CHILE ASESORÍAS, S.A	99.9900	MAPFRE, S.A.
MAPFRE COMPAÑÍA DE SEGUROS GENERALES DE CHILE S.A.	87.2900	MAPFRE, S.A.
HUMANA	99.9995	MAPFRE, S.A.
OTHER GROUP COMPANIES		
MAPFRE AM- IBERIAN EQUITIES	6.5869	MAPFRE, S.A.
MAPFRE AM- SHORT TERM EURO I	3.5927	MAPFRE, S.A.
MAPFRE AM-MULTI ASSET STRATEGY	11.5538	MAPFRE, S.A.
MAPFRE AM-US FORGOTTEN VALUE	14.6100	MAPFRE, S.A.
MAPFRE INFRAESTRUCTURAS FCR	19.0500	MAPFRE, S.A.
MAPFRE PRIVATE DBT, FII	20.9733	MAPFRE, S.A.
STABLE INCOME EUROPEAN REAL ESTATE FUND	8.4500	MAPFRE, S.A.
FONDMAPFRE GARANTIA III, F.I.	0.0000	MAPFRE, S.A.
MAPFRE PRIVATE EQUITY I FCR	10.6800	MAPFRE, S.A.
SIEREF MAPFRE	25.6000	MAPFRE, S.A.
SIEREF MANOVA 1	8.4500	MAPFRE, S.A.
SIEREF MANOVA 2	19.0476	MAPFRE, S.A.
MAPFRE ENERGIAS RENOVABLES I, F.C.R.	27.9300	MAPFRE, S.A.
ENERGIAS RENOVABLES IBERMAP, S.L.	49.0000	MAPFRE, S.A.
MAPFRE RE COMPAÑÍA DE REASEGUROS, S.A.	94.4265	MAPFRE, S.A.
INMOBILIARIA PRESIDENTE FIGUEROA ALCORTA, S.A.	99.9985	MAPFRE, S.A.

COMPANY NAME	% OWNED	ULTIMATE CONTROLLING COMPANY
MAPFRE AM- SHORT TERM EURO I	55.3715	MAPFRE, S.A.
MAPFRE AM-MULTI ASSET STRATEGY	49.3950	MAPFRE, S.A.
MAPFRE AM-US FORGOTTEN VALUE	20.5281	MAPFRE, S.A.
MAPFRE CHILE REASEGUROS, S.A.	99.9900	MAPFRE, S.A.
C R ARGENTINA, S.A.	99.9900	MAPFRE, S.A.
CAJA REASEGURADORA DE CHILE S.A.	99.8467	MAPFRE, S.A.
MAPFRE EURO BONDS FUND	100.0000	MAPFRE, S.A.
MAPFRE INFRAESTRUCTURAS FCR	6.5600	MAPFRE, S.A.
MAPFRE PRIVATE DBT, FII	32.3244	MAPFRE, S.A.
MAPFRE PRIVATE EQUITY I FCR	35.7600	MAPFRE, S.A.
MAPFRE RE DO BRASIL COMPAÑÍA DE REASEGUROS S.A.	99.9999	MAPFRE, S.A.
MAPFRE RE ESCRITORIO DE REPRESENTACION COMPAÑÍA DE REASEGUROS	0.0001	MAPFRE, S.A.
MAPFRE RE ESCRITORIO DE REPRESENTACION COMPAÑÍA DE REASEGUROS	99.9999	MAPFRE, S.A.
MAPFRE RE VERMONT CORPORATION	100.0000	MAPFRE, S.A.
REINSURANCE MANAGEMENT INC.	100.0000	MAPFRE, S.A.
MAP SL EUROPEIN INVEST SARL	6.8400	MAPFRE, S.A.
MEAG EUROPE OFFICE SELECT EOS SCSP SICAV-RIAV	22.5000	MAPFRE, S.A.
REINSURANCE MANAGAMENT INC.	100.0000	MAPFRE, S.A.
RISK MED SOLUTIONS, S.L.	100.0000	MAPFRE, S.A.
SERVICIOS GENERALES VENEASISTENCIA, S.A.	0.0020	MAPFRE, S.A.
SIEREF MAPFRE	40.3600	MAPFRE, S.A.
OLIFAN INMO 18 OPC	72.8205	MAPFRE, S.A.
SWISSLIFE SPPICAV	50.0000	MAPFRE, S.A.
SIEREF MANOVA 1	16.2600	MAPFRE, S.A.
MAPFRE ENERGIAS RENOVABLES I, F.C.R.	25.3600	MAPFRE, S.A.
MAPFRE INMUEBLES, S.G.A.	9.9983	MAPFRE, S.A.
ALMA MUNDI INSURTECH FUND, FCRE	24.9400	MAPFRE, S.A.
ALMA MUNDI INSURTECH II FUND, FCRE	35.4700	MAPFRE, S.A.
LA FINANCIERE RESPONSABLE	51.0000	MAPFRE, S.A.
MEAG EUROPE OFFICE SELECT EOS SCSP SICAV-RIAV	5.0000	MAPFRE, S.A.
SANTANDER MAPFRE HIPOTECA INVERSA EFC, S.A.	50.0000	MAPFRE, S.A.
Solunion Seguros Compania Internacional De Seguros Y Reaseguros S.A.	50.0000	MAPFRE, S.A.
STABLE INCOME REAL STATE FUN GP S.A.R.I.	100.0000	MAPFRE, S.A.
MAPFRE GLOBAL RISK AGENCIA DE SUSCRIPCION	100.0000	MAPFRE, S.A.
MAPFRE INTERNACIONAL S.A.	0.0001	MAPFRE, S.A.
MAPFRE INVESTMENT S.A.	100.0000	MAPFRE, S.A.
MAPFRE BRASIL PARTICIPAÇÕES, S.A.	0.8300	MAPFRE, S.A.
MAPFRE TECH, S.A.	100.0000	MAPFRE, S.A.
MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS S.A.	0.0006	MAPFRE, S.A.
MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	0.0005	MAPFRE, S.A.
ROADSIDE ASSIST ALGERIE SPA	0.3000	MAPFRE, S.A.
NILE ASSIST	1.0000	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.	0.0600	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.	0.0700	MAPFRE, S.A.
VERTI ASSICURIZIONI SPA	0.0012	MAPFRE, S.A.

STATEMENT AS OF JUNE 30, 2025 OF THE AMERICAN COMMERCE INSURANCE COMPANY

SCHEDULE Y

PART 1A - DETAILS 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)	*
							FUNDACION MAPFRE	.ESP	UIP.....	FUNDACION MAPFRE	Ownership.....	100.000	FUNDACION MAPFRE	... NO.....	
							CARTERA MAPFRE, S.L.	.ESP	UIP.....	FUNDACION MAPFRE	Ownership.....	100.000	FUNDACION MAPFRE	... NO.....	
							MAPFRE, S.A.	.ESP	UIP.....	CARTERA MAPFRE, S.L.	Ownership.....	69.800	FUNDACION MAPFRE	... NO.....	
			04-2495247				BIGELOW & OLD WORCESTER, LLC	.MA	NIA.....	COMMERCE INSURANCE	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
.0411	MAPFRE INSURANCE GROUP	34754	04-2495247				THE COMMERCE INSURANCE COMPANY	.MA	IA.....	MAPFRE USA CORPORATION	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
			04-2599931				MAPFRE USA CORPORATION INC	.MA	UIP.....	MAPFRE INTERNACIONAL S.A.	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
.0411	MAPFRE INSURANCE GROUP	40274	04-2739876				CITATION INSURANCE COMPANY	.MA	IA.....	MAPFRE USA CORPORATION	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
			04-3148033				BFC HOLDING CORPORATION	.MA	NIA.....	MAPFRE USA CORPORATION	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
			05-0501519				ACIC HOLDINGS COMPANY, INC.	.MA	UDP.....	MAPFRE USA CORPORATION	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
.0411	MAPFRE INSURANCE GROUP	19941	31-4361173				AMERICAN COMMERCE INSURANCE COMPANY	.OH	RE.....	ACIC HOLDINGS	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
			33-0891690				CENTURY AUTOMOTIVE SERVICES COMPANY	.NM	NIA.....	MAPFRE ASSISTANCE USA INC	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
.0411	MAPFRE INSURANCE GROUP	23876	36-3347420				MAPFRE INSURANCE COMPANY	.NJ	IA.....	COMMERCE INSURANCE	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
			46-0547293				MAPFRE ASSISTANCE USA INC.	.FL	NIA.....	MAPFRE USA CORPORATION INC	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
.0411	MAPFRE INSURANCE GROUP	15736	47-2744441				VERTI INSURANCE COMPANY	.OH	IA.....	MAPFRE USA CORPORATION	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
.0411	MAPFRE INSURANCE GROUP	34932	65-0131982				MAPFRE INSURANCE COMPANY OF FLORIDA	.FL	IA.....	COMMERCE INSURANCE	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
			65-0419731				FEDERAL ASSIST COMPANY	.FL	NIA.....	MAPFRE ASSISTANCE USA INC.	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
.0411	MAPFRE INSURANCE GROUP	31690	66-0319465				MAPFRE PAN AMERICAN INSURANCE COMPANY	.PR	IA.....	MAPFRE PRAICO CORPORATION	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
			66-0391019				MAPFRE FINANCE OF PUERTO RICO CORP.	.PR	NIA.....	MAPFRE PRAICO CORPORATION	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
							MAPFRE LIFE INSURANCE COMPANY OF PUERTO RICO								
.0411	MAPFRE INSURANCE GROUP	77054	66-0402309					.PR	IA.....	MAPFRE PRAICO CORPORATION	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
.0411	MAPFRE INSURANCE GROUP	43052	66-0470284				MAPFRE PRAICO INSURANCE COMPANY	.PR	IA.....	MAPFRE PRAICO CORPORATION	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
			66-0595402				MAPFRE SOLUTIONS, INC	.PR	NIA.....	MAPFRE PRAICO CORPORATION	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
							MAPFRE INSURANCE AGENCY OF PUERTO RICO, INC.								
			66-0621733					.PR	NIA.....	MAPFRE PRAICO CORPORATION	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
			66-0781080				MAPFRE PRAICO CORPORATION	.PR	NIA.....	MAPFRE INTERNACIONAL, S.A.	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
			81-2900487				MAPFRE WARRANTY CORPORATION OF FLORIDA	.FL	NIA.....	MAPFRE ASSISTANCE USA INC	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
			82-2516034				MAPFRE TECH USA CORPORATION	.DE	NIA.....	MAPFRE USA CORPORATION	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
			83-2698500				MAPFRE RE VERMONT CORPORATION	.VT	IA.....	MAPFRE RE, S.A.	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
.0411	MAPFRE INSURANCE GROUP	16475	87-3052241				AUTO CLUB MAPFRE INSURANCE	.OH	IA.....	MAPFRE USA CORPORATION	Ownership.....	65.000	MAPFRE S.A.	... NO.....	
.0411	MAPFRE INSURANCE GROUP	17286	94-1137122				COMMERCE WEST INSURANCE COMPANY	.CA	UDP.....	ACIC HOLDINGS	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
							MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	.COL	NIA.....	APOINT S.A.	Ownership.....	6.143	MAPFRE S.A.	... NO.....	
							MAPFRE COLOMBIA VIDA SEGUROS S.A.	.COL	IA.....	APOINT S.A.	Ownership.....	5.646	MAPFRE S.A.	... NO.....	
							ALIANÇA DO BRASIL SEGUROS, S.A.	.BRA	IA.....	BB MAPFRE PARTICIPAÇÕES S.A.	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
							BRASILSEG COMPANHIA DE SEGUROS S.A.	.BRA	IA.....	BB MAPFRE PARTICIPAÇÕES S.A.	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
							EUROMED RISKS SOLUTIONS LIMITED	.MLT	NIA.....	BEE INSURANCE MANAGEMENT LTD	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
							SALUD DIGITAL MAPFRE S.A.	.ESP	NIA.....	CENTROS MÉDICOS MAPFRE, S.A.	Ownership.....	2.500	MAPFRE S.A.	... NO.....	
							MULTISERVICIOS MAPFRE MULTIMAP, S.A.	.ESP	NIA.....	CENTROS MÉDICOS S.A.	Ownership.....	2.500	MAPFRE S.A.	... NO.....	
							Bright Idea Insurance Solutions	.FL	NIA.....	COMMERCE INSURANCE	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
							MM REAL ESTATE, LLC	.FL	NIA.....	COMMERCE INSURANCE	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
							NILE ASSIST	.EGY	NIA.....	MAPFRE TECH, S.A.	Ownership.....	1.000	MAPFRE S.A.	... NO.....	
							MAPFRE SERVICIOS EXEQUIALES SAS	.COL	NIA.....	CREDIMAPFRE S.A.	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
							CEMENTERIO JARDÍN DE ALCALA DE HENARES, S.A.								
								.ESP	NIA.....	FUNEMADRID	Ownership.....	49.000	MAPFRE S.A.	... NO.....	
							POMPES FÚNEBRES DOMINGO, S.L.	.ESP	NIA.....	FUNESPAÑA DOS, S.L.	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
							SERVICIOS FUNERARIOS FUNEMADRID, S.A.U.	.ESP	NIA.....	FUNESPAÑA DOS, S.L.	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
							EMPRESA MIXTA SERVEIS MUNICIPALS DE								
							TARRAGONA, S.L.	.ESP	NIA.....	FUNESPAÑA DOS, S.L.	Ownership.....	49.000	MAPFRE S.A.	... NO.....	
							CEMENTERIO PARQUE ANDUJAR, S.A.	.ESP	NIA.....	FUNESPAÑA DOS, S.L.	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
							SERVICIOS FUNERARIOS DE ZARAGOZA, S.L.	.ESP	NIA.....	FUNESPAÑA DOS, S.L.	Ownership.....	70.000	MAPFRE S.A.	... NO.....	

STATEMENT AS OF JUNE 30, 2025 OF THE AMERICAN COMMERCE INSURANCE COMPANY

SCHEDULE Y
PART 1A - DETAILS 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 Loca-tion	Rela-tion-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)	*
							INICIATIVAS ALCAÉSAR, S.L.	.ESP	NIA	FUNESPAÑA DOS, S.L.	Ownership.....	40.000	MAPFRE S.A.	NO	
							SALZILLO SERVICIOS FUNERARIOS, S.L.	.ESP	NIA	FUNESPAÑA DOS, S.L.	Ownership.....	45.000	MAPFRE S.A.	NO	
							DE MENA SERVICIOS FUNERARIOS, S.L.	.ESP	NIA	FUNESPAÑA DOS, S.L.	Ownership.....	70.000	MAPFRE S.A.	NO	
							ISABELO ALVAREZ MAYORGA, S.A.	.ESP	NIA	FUNESPAÑA DOS, S.L.	Ownership.....	50.000	MAPFRE S.A.	NO	
							SERVICIOS FUNERARIOS DEL NERVIÓN, S.L.	.ESP	NIA	FUNESPAÑA DOS, S.L.	Ownership.....	50.000	MAPFRE S.A.	NO	
							NUEVO TANATORIO, S.L.	.ESP	NIA	FUNESPAÑA DOS, S.L.	Ownership.....	50.000	MAPFRE S.A.	NO	
							SERVICIOS FUNERARIOS LA CARIDAD, S.L.	.ESP	NIA	FUNESPAÑA DOS, S.L.	Ownership.....	50.000	MAPFRE S.A.	NO	
							TANATORIO DE ÉCIJA, S.L.	.ESP	NIA	FUNESPAÑA DOS, S.L.	Ownership.....	33.330	MAPFRE S.A.	NO	
							TANATORIO SE-30 SEVILLA, S.L.	.ESP	NIA	FUNESPAÑA DOS, S.L.	Ownership.....	10.000	MAPFRE S.A.	NO	
							FUNERARIAS REUNIDAS DEL BIERZO, S.A.	.ESP	NIA	FUNESPAÑA DOS, S.L.	Ownership.....	85.820	MAPFRE S.A.	NO	
							SERVICIOS FUNERARIOS LUCEM S.L.	.ESP	NIA	FUNESPAÑA DOS, S.L.	Ownership.....	50.000	MAPFRE S.A.	NO	
							FUNERARIA SAN VICENTE, S.L.	.ESP	NIA	FUNESPAÑA DOS, S.L.	Ownership.....	50.000	MAPFRE S.A.	NO	
							FUNERARIA ALIANZA CANARIA, S.L.	.ESP	NIA	FUNESPAÑA DOS, S.L.	Ownership.....	100.000	MAPFRE S.A.	NO	
							FUNESPAÑA DOS, S.L.	.ESP	NIA	FUNESPAÑA, S.A.	Ownership.....	100.000	MAPFRE S.A.	NO	
							TANATORIUM ZRT	.HUN	NIA	FUNESPAÑA, S.A.	Ownership.....	100.000	MAPFRE S.A.	NO	
							ALL FUNERAL SERVICES, S.L.	.ESP	NIA	FUNESPAÑA, S.A.U.	Ownership.....	100.000	MAPFRE S.A.	NO	
							FUNESPAÑA CHILE, S.A.	.CHL	NIA	FUNESPAÑA, S.A.U.	Ownership.....	50.000	MAPFRE S.A.	NO	
							FUNEUOPA CHILE, S.A.	.CHL	NIA	FUNESPAÑA, S.A.U.	Ownership.....	50.000	MAPFRE S.A.	NO	
							MAPFRE MÉXICO S.A.	.MEX	IA	GRUPO CORPORATIVO LML S.A.	Ownership.....	44.340	MAPFRE S.A.	NO	
							MAWDY S.A.S.	.COL	NIA	MAWDY DIGITAL ASSISTANCE SERVICE, S.A.	Ownership.....	1.910	MAPFRE S.A.	NO	
							MAWDY S.A.	.ARG	NIA	MAWDY DIGITAL ASSISTANCE SERVICES, S.A. ..	Ownership.....	1.580	MAPFRE S.A.	NO	
							SUR ASISTENCIA, S.A.	.CHL	NIA	MAWDY DIGITAL ASSISTANCE SERVICES, S.A. ..	Ownership.....	1.000	MAPFRE S.A.	NO	
							MAWDY S.A.	.URY	NIA	MAWDY DIGITAL ASSISTANCE SERVICES, S.A. ..	Ownership.....	2.668	MAPFRE S.A.	NO	
							NILE ASSIST	.EGY	NIA	MAWDY DIGITAL ASSISTANCE SERVICES, S.A. ..	Ownership.....	1.000	MAPFRE S.A.	NO	
							PARAGUAY ASISTENCIA CIA. DE SERVICIOS S.A.	.PRY	NIA	MAWDY DIGITAL ASSISTANCE SERVICES, S.A. ..	Ownership.....	1.050	MAPFRE S.A.	NO	
							MAPFRE SEGUROS GERAIS S.A. (BRAZIL)	.BRA	IA	MAPFRE PARTICIPAÇÕES, S.A.	Ownership.....	100.000	MAPFRE S.A.	NO	
							MAPFRE TENEDORA DE ACC, S.A.	.PAN	IA	MAPFRE AMERICA CENTRAL, S.A.	Ownership.....	100.000	MAPFRE S.A.	NO	
							MAPFRE SEGUROS HONDURAS S.A.	.HND	IA	MAPFRE AMERICA CENTRAL, S.A.	Ownership.....	25.103	MAPFRE S.A.	NO	
							MAPFRE PANAMÁ S.A.	.PAN	IA	MAPFRE AMERICA CENTRAL, S.A.	Ownership.....	99.377	MAPFRE S.A.	NO	
							MAPFRE SEGUROS EL SALVADOR, S.A.	.SLV	NIA	MAPFRE AMERICA CENTRAL, S.A.	Ownership.....	78.107	MAPFRE S.A.	NO	
							INMOBILIARIA AMERICANA S.A.	.SLV	NIA	MAPFRE AMERICA CENTRAL, S.A.	Ownership.....	78.900	MAPFRE S.A.	NO	
							MAPFRE ARGENTINA SEGUROS S.A.	.ARG	IA	MAPFRE ARGENTINA HOLDING S.A.	Ownership.....	99.999	MAPFRE S.A.	NO	
							CLUB MAPFRE ARGENTINA S.A.	.ARG	NIA	MAPFRE ARGENTINA HOLDING S.A.	Ownership.....	97.000	MAPFRE S.A.	NO	
							MAPFRE ARGENTINA SEGUROS DE VIDA S.A.	.ARG	IA	MAPFRE ARGENTINA HOLDING S.A.	Ownership.....	36.000	MAPFRE S.A.	NO	
							CLUB MAPFRE ARGENTINA S.A.	.ARG	NIA	MAPFRE ARGENTINA SEGUROS DE VIDA S.A.	Ownership.....	3.000	MAPFRE S.A.	NO	
							CESVI ARGENTINA, S.A.	.ARG	NIA	MAPFRE ARGENTINA SEGUROS S.A.	Ownership.....	60.640	MAPFRE S.A.	NO	
							MAWDY LTDA	.BRA	IA	MAPFRE ASISTENCIA, S.A.	Ownership.....	99.999	MAPFRE S.A.	NO	
							GENVO SERVIZI E SOLUZIONI S.R.L.	.ITA	NIA	MAPFRE ASISTENCIA, S.A.	Ownership.....	50.000	MAPFRE S.A.	NO	
							AFRIQUE ASSISTANCE, S.A.	.TUN	NIA	MAPFRE ASISTENCIA, S.A.	Ownership.....	49.000	MAPFRE S.A.	NO	
							SERVICIOS GENERALES VENEASISTENCIA, S.A.	.VEN	NIA	MAPFRE ASISTENCIA, S.A.	Ownership.....	99.998	MAPFRE S.A.	NO	
							MAWDY S.A.S.	.COL	NIA	MAPFRE ASISTENCIA, S.A.	Ownership.....	98.090	MAPFRE S.A.	NO	
							MAWDY S.A.	.ECU	IA	MAWDY S.A.S.	Ownership.....	1.000	MAPFRE S.A.	NO	
							MAWDY SERVICES	.PRT	NIA	MAPFRE ASISTENCIA, S.A.	Ownership.....	100.000	MAPFRE S.A.	NO	
							MAWDY S.A.	.ARG	NIA	MAPFRE ASISTENCIA, S.A.	Ownership.....	98.420	MAPFRE S.A.	NO	
							MAWDY DIGITAL ASSISTANCE SERVICES S.A.	.ESP	NIA	MAPFRE ASISTENCIA, S.A.	Ownership.....	99.930	MAPFRE S.A.	NO	
							SUR ASISTENCIA, S.A.	.CHL	NIA	MAPFRE ASISTENCIA, S.A.	Ownership.....	99.000	MAPFRE S.A.	NO	
							MAWDY SERVICES	.IRL	NIA	MAPFRE ASISTENCIA, S.A.	Ownership.....	100.000	MAPFRE S.A.	NO	
							MAWDY S.A.	.DOM	NIA	MAPFRE ASISTENCIA, S.A.	Ownership.....	83.582	MAPFRE S.A.	NO	
							MAWDY S.A.	.ECU	NIA	MAPFRE ASISTENCIA, S.A.	Ownership.....	99.000	MAPFRE S.A.	NO	

STATEMENT AS OF JUNE 30, 2025 OF THE AMERICAN COMMERCE INSURANCE COMPANY

SCHEDULE Y

PART 1A - DETAILS OF INSURANCE HOLDING COMPANY SYSTEM

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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 Per-centage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Re-quired? (Yes/No)	*
...	...	...	...	...	...	...	MAVDY S.A. DE C.V.	.MEX.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	MAVDY S.A.	.PAN.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	84.000 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	MAVDY S.A.	.URY.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	97.332 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	MAVDY S.A.	.GTM.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	99.992 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	MAVDY S.A. DE C.V.	.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.....	...
...	...	...	...	...	...	...	MAVDY SERVICES S.P.A.	.ITA.....	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 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...						250,100.000			
...	...	...	...	...	...	...	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.....	100.000 ...	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	.DOM.....	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.....	...
...	...	...	...	...	...	...	SIEREF MAPFRE	.LUX.....	NIA.....	MAPFRE ESPAÑA, S.A.	Ownership.....	20.310 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	MAPFRE Private DBT, FII	.ESP.....	NIA.....	MAPFRE ESPAÑA, S.A.	Ownership.....	31.071 ...	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.....	99.907 ...	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.....	...
...	...	...	...	...	...	...	AUDATEX ESPAÑA, S.A.	.ESP.....	NIA.....	MAPFRE ESPAÑA, S.A.	Ownership.....	12.500 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	TECNOLOGÍAS DE LA INFORMACIÓN Y REDES PARA LAS ENTIDADES ASEGURADORAS, S.A.	.ESP.....	NIA.....	MAPFRE ESPAÑA, S.A.	Ownership.....	22.951 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	AGROSEGURO	.ESP.....	NIA.....	MAPFRE ESPAÑA, S.A.	Ownership.....	18.370 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	SALVADOR CAETANO AUTO (SGPS), S.A.	.PRT.....	NIA.....	MAPFRE ESPAÑA, S.A.	Ownership.....	24.610 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	SALUD DIGITAL MAPFRE S.A.	.ESP.....	NIA.....	MAPFRE ESPAÑA, S.A.	Ownership.....	97.500 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	PUY DU FOU ESPAÑA, S.A.	.ESP.....	NIA.....	MAPFRE ESPAÑA, S.A.	Ownership.....	19.849 ...	MAPFRE S.A.	... NO.....	...

STATEMENT AS OF JUNE 30, 2025 OF THE AMERICAN COMMERCE INSURANCE COMPANY

SCHEDULE Y
PART 1A - DETAILS 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 Per-centage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Re-quired? (Yes/No)	*
							SANTANDER MAPFRE SEGUROS Y REASEGUROS S.A.	.ESP	NIA	MAPFRE ESPAÑA, S.A.	Ownership	50.010	MAPFRE S.A.	NO	
							MAPFRE INMUEBLES, S.G.A.	.ESP	NIA	MAPFRE ESPAÑA, S.A.	Ownership	82.973	MAPFRE S.A.	NO	
							MULTISERVICIOS MAPFRE MULTIMAP, S.A.	.ESP	NIA	MAPFRE ESPAÑA, S.A.	Ownership	97.500	MAPFRE S.A.	NO	
							MAPFRE AM-MULTI ASSET STRATEGY	.LUX	NIA	MAPFRE ESPAÑA, S.A.	Ownership	39.051	MAPFRE S.A.	NO	
							MAPFRE AM- SHORT TERM EURO I	.LUX	NIA	MAPFRE ESPAÑA, S.A.	Ownership	40.179	MAPFRE S.A.	NO	
							MAPFRE AM-US FORGOTTEN VALUE	.LUX	NIA	MAPFRE ESPAÑA, S.A.	Ownership	30.704	MAPFRE S.A.	NO	
							SWISSLIFE SPPICAV	.LUX	NIA	SIEREFF MAPFRE	Ownership	50.000	MAPFRE S.A.	NO	
							OLIFAN INMO 18 OPCI	.LUX	NIA	SIEREFF MAPFRE	Ownership	72.821	MAPFRE S.A.	NO	
							MAPFRE INFRAESTRUCTURAS FOR	.ESP	NIA	MAPFRE ESPAÑA, S.A.	Ownership	5.670	MAPFRE S.A.	NO	
							MAPFRE PRIVATE EQUITY I FOR	.ESP	NIA	MAPFRE ESPAÑA, S.A.	Ownership	28.080	MAPFRE S.A.	NO	
							MAPFRE ENERGÍAS RENOVABLES I, F.C.R.	.ESP	NIA	MAPFRE ESPAÑA, S.A.	Ownership	26.490	MAPFRE S.A.	NO	
							MEAG EUROPE OFFICE SELECT EOS SCSP SICAV-RIAV	.LUX	NIA	MAPFRE ESPAÑA, S.A.	Ownership	22.500	MAPFRE S.A.	NO	
							CLUB MAPFRE, S.A. (SPAIN)	.ESP	NIA	MAPFRE ESPAÑA, S.A.	Ownership	99.988	MAPFRE S.A.	NO	
							DESARROLLOS URBANOS CIC, S.A.	.ESP	NIA	MAPFRE INMUEBLES, S.G.A.	Ownership	99.922	MAPFRE S.A.	NO	
							SERVICIOS INMOBILIARIOS MAPFRE S.A.	.ESP	NIA	MAPFRE INMUEBLES, S.G.A.	Ownership	99.900	MAPFRE S.A.	NO	
							MAP SL EROPEAN INVEST SARL	.LUX	NIA	MAPFRE INMUEBLES, S.G.A.	Ownership	43.160	MAPFRE S.A.	NO	
							MAPAR IMPERIAL 14, S.L.	.ESP	NIA	MAPFRE INMUEBLES, S.G.A.	Ownership	100.000	MAPFRE S.A.	NO	
							MAPFRE BRASIL PARTICIPAÇÕES, S.A.	.BRA	IA	MAPFRE INTERNACIONAL, S.A.	Ownership	99.170	MAPFRE S.A.	NO	
							MAPFRE S.E.M., S.A.	.PAN	IA	MAPFRE INTERNACIONAL, S.A.	Ownership	100.000	MAPFRE S.A.	NO	
							MAPFRE AMERICA CENTRAL S.A.	.PAN	NIA	MAPFRE INTERNACIONAL, S.A.	Ownership	99.900	MAPFRE S.A.	NO	
							MAPFRE DOMINICANA S.A.	.DOM	NIA	MAPFRE INTERNACIONAL, S.A.	Ownership	100.000	MAPFRE S.A.	NO	
							MAPFRE MÉXICO S.A.	.MEX	IA	MAPFRE INTERNACIONAL, S.A.	Ownership	55.660	MAPFRE S.A.	NO	
							GRUPO CORPORATIVO LML S.A. DE C.V.	.MEX	NIA	MAPFRE INTERNACIONAL, S.A.	Ownership	100.000	MAPFRE S.A.	NO	
							MAPFRE ARGENTINA HOLDING S.A.	.ARG	NIA	MAPFRE INTERNACIONAL, S.A.	Ownership	100.000	MAPFRE S.A.	NO	
							MAPFRE ARGENTINA SEGUROS DE VIDA S.A.	.ARG	IA	MAPFRE INTERNACIONAL, S.A.	Ownership	64.000	MAPFRE S.A.	NO	
							MAPFRE CHILE SEGUROS S.A.	.CHL	NIA	MAPFRE INTERNACIONAL, S.A.	Ownership	100.000	MAPFRE S.A.	NO	
							MAPFRE CHILE VIDA, S.A.	.CHL	NIA	MAPFRE INTERNACIONAL, S.A.	Ownership	100.000	MAPFRE S.A.	NO	
							MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	.COL	NIA	MAPFRE INTERNACIONAL, S.A.	Ownership	93.853	MAPFRE S.A.	NO	
							MAPFRE COLOMBIA VIDA SEGUROS S.A.	.COL	IA	MAPFRE INTERNACIONAL, S.A.	Ownership	94.354	MAPFRE S.A.	NO	
							MAPFRE ATLAS COMPAÑÍA DE SEGUROS, S.A.	.ECU	IA	MAPFRE INTERNACIONAL, S.A.	Ownership	78.642	MAPFRE S.A.	NO	
							MAPFRE PARAGUAY COMPAÑÍA DE SEGUROS S.A.	.PRY	IA	MAPFRE INTERNACIONAL, S.A.	Ownership	89.540	MAPFRE S.A.	NO	
							MAPFRE PERÚ COMPAÑÍA DE SEGUROS Y REASEGUROS S.A. (in 2021 Mapfe Peru Vida								
							cia. De Seguros y Reaseguros)	.PER	IA	MAPFRE INTERNACIONAL, S.A.	Ownership	99.590	MAPFRE S.A.	NO	
							MAPFRE PERÚ ENTIDAD PRESTADORA DE SALUD	.PER	NIA	MAPFRE INTERNACIONAL, S.A.	Ownership	100.000	MAPFRE S.A.	NO	
							APOINT S.A.	.URY	NIA	MAPFRE INTERNACIONAL, S.A.	Ownership	100.000	MAPFRE S.A.	NO	
							MAPFRE URUGUAY SEGUROS S.A.	.URY	IA	MAPFRE INTERNACIONAL, S.A.	Ownership	100.000	MAPFRE S.A.	NO	
							MAPFRE LA SEGURIDAD C.A. DE SEGUROS	.VEN	NIA	MAPFRE INTERNACIONAL, S.A.	Ownership	99.516	MAPFRE S.A.	NO	
							AMA-ASISTENCIA MEDICA ADMINISTRADA, C.A.	.VEN	NIA	MAPFRE INTERNACIONAL, S.A.	Ownership	99.700	MAPFRE S.A.	NO	
							VERTI VERSICHERUNG AG	.DEU	IA	MAPFRE INTERNACIONAL, S.A.	Ownership	100.000	MAPFRE S.A.	NO	
							VERTI ASSICURIZIONI S.P.A.	.ITA	IA	MAPFRE INTERNACIONAL, S.A.	Ownership	99.998	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 INVESTIMENTOS 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	

SCHEDULE Y
PART 1A - DETAILS 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)	*
.....							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. (VENEZUELA)	..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.....	
.....							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 MÉXICO S.A.	Ownership.....	..99.998	MAPFRE S.A.	..NO.....	
.....							MAPFRE DEFENSA LEGAL S.A. DE C.V.	..MEX.....	..NIA.....	MAPFRE MÉXICO S.A.	Ownership.....	..100.000	MAPFRE S.A.	..NO.....	
.....							MAPFRE TEPEYAC INC.	..CA.....	..NIA.....	MAPFRE MÉXICO S.A.	Ownership.....	..100.000	MAPFRE S.A.	..NO.....	
.....							MAPFRE SERVICIOS MEXICANOS S.A.	..MEX.....	..NIA.....	MAPFRE MÉXICO S.A.	Ownership.....	..99.990	MAPFRE S.A.	..NO.....	
.....							CESVI MÉXICO, S.A.	..MEX.....	..NIA.....	MAPFRE MÉXICO S.A.	Ownership.....	..16.670	MAPFRE S.A.	..NO.....	
.....							MAPFRE FIANZAS S.A.	..MEX.....	..IA.....	MAPFRE MÉXICO 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			MAPFRE PERÚ COMPAÑÍA DE SEGUROS Y					
.....							CORPORACIÓN FUNERARIA, S.A.	..PER.....	..NIA.....	REASEGUROS S.A.	Ownership.....	..100.000	MAPFRE S.A.	..NO.....	
.....							SIEREF MAPFRE	..LUX.....	..NIA.....	MAPFRE RE, S.A.	Ownership.....	..40.360	MAPFRE S.A.	..NO.....	
.....							MAPFRE Private DBT, FII	..ESP.....	..NIA.....	MAPFRE RE, S.A.	Ownership.....	..32.324	MAPFRE S.A.	..NO.....	
.....							MAPFRE AM-MULTI ASSET STRATEGY	..LUX.....	..NIA.....	MAPFRE RE, S.A.	Ownership.....	..49.395	MAPFRE S.A.	..NO.....	
.....							MAPFRE AM- SHORT TERM EURO I	..LUX.....	..NIA.....	MAPFRE RE, S.A.	Ownership.....	..55.372	MAPFRE S.A.	..NO.....	
.....							SIEREF MANOVA 1	..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.....	..20.528	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.....	..35.760	MAPFRE S.A.	..NO.....	
.....							MAPFRE ENERGIAS RENOVABLES I, F.C.R.	..ESP.....	..NIA.....	MAPFRE RE, S.A.	Ownership.....	..25.360	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.....	..100.000	MAPFRE S.A.	..NO.....	
.....							MAPFRE RE ESCRITORIO DE REPRESENTACION COMPAÑÍA DE REASEGUROS	..BRA.....	..NIA.....	MAPFRE RE, S.A.	Ownership.....	..100.000	MAPFRE S.A.	..NO.....	
.....							INMOBILIARIA PRESIDENTE FIGUEROA ALCORTA, S.A.	..ARG.....	..NIA.....	MAPFRE RE, S.A.	Ownership.....	..99.999	MAPFRE S.A.	..NO.....	
.....							REINSURANCE MANAGAMENT 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.....	

STATEMENT AS OF JUNE 30, 2025 OF THE AMERICAN COMMERCE INSURANCE COMPANY

SCHEDULE Y
PART 1A - DETAILS 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)	*
							STABLE INCOME REAL STATE FUN GP S.A.R.I.	.LUX.....	NIA.....	MAPFRE S.A.	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	
							SOLUNION SEGUROS COMPANIA 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 I I FUND, FCRE	.ESP.....	NIA.....	MAPFRE S.A.	Ownership.....	35.470 ...	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 COMPANHIA 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 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	.LUX.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	43.878 ...	MAPFRE S.A.	... NO.....	
							FONDIMAPFRE BOLSA MIXTO F.I.	.ESP.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	58.978 ...	MAPFRE S.A.	... NO.....	
							SIEREF MANOVA 1	.LUX.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	19.900 ...	MAPFRE S.A.	... NO.....	
							SIEREF MANOVA 2	.LUX.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	12.698 ...	MAPFRE S.A.	... NO.....	
							MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS S.A.	.ESP.....	IA.....	MAPFRE, S.A.	Ownership.....	99.999 ...	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 COMPAÑÍA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	.ESP.....	IA.....	MAPFRE, S.A.	Ownership.....	99.997 ...	MAPFRE S.A.	... NO.....	
							MAPFRE RE COMPAÑÍA DE REASEGUROS, S.A.	.ESP.....	IA.....	MAPFRE, S.A.	Ownership.....	94.427 ...	MAPFRE S.A.	... NO.....	
							MAPFRE INTERNACIONAL S.A.	.ESP.....	UIP.....	MAPFRE, S.A.	Ownership.....	100.000 ...	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.....	
							SIEREF MANOVA 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.....	3.593 ...	MAPFRE S.A.	... NO.....	
							SIEREF MANOVA 1	.LUX.....	NIA.....	OTHER GROUP COMPANIES	Ownership.....	8.450 ...	MAPFRE S.A.	... NO.....	
							MAPFRE AM-US FORGOTTEN VALUE	.LUX.....	NIA.....	OTHER GROUP COMPANIES	Ownership.....	14.610 ...	MAPFRE S.A.	... NO.....	
							MAPFRE INFRAESTRUCTURAS FCR	.ESP.....	NIA.....	OTHER GROUP COMPANIES	Ownership.....	19.050 ...	MAPFRE S.A.	... NO.....	
							MAPFRE SEGUROS GERAIS S.A. (PORTUGAL)	.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.....	10.680 ...	MAPFRE S.A.	... NO.....	
							MAPFRE ENERGÍAS RENOVABLES I, F.C.R.	.ESP.....	NIA.....	OTRAS SOCIEDADES DEL GRUPO	Ownership.....	27.930 ...	MAPFRE S.A.	... NO.....	

STATEMENT AS OF JUNE 30, 2025 OF THE AMERICAN COMMERCE INSURANCE COMPANY

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

1	2	3	4	5	6	7	8	9	10	11	12 Type of Control (Ownership, Board, Management, Attorney-in-Fact, Influence, Other)	13 If Control is Owner- ship Provide Percen- tage	14 Ultimate Controlling Entity(ies)/Person(s)	15 Is an SCA Filing Re- quired? (Yes/No)	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 Loca- tion	Relation- ship to Reporting Entity	Directly Controlled by (Name of Entity/Person)					
....							SIEREF MANOVA 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.....	
....							SIEREF MAPFRE	.LUX.....	NIA.....	OTRAS SOCIEDADES DEL GRUPO	Ownership.....	..25.600 ...	MAPFRE S.A.	...NO.....	
....							MAPFRE Private DBT, FII	.ESP.....	NIA.....	OTRAS SOCIEDADES DEL GRUPO	Ownership.....	..20.973 ...	MAPFRE S.A.	...NO.....	
....							BROTO, S.A.	.BRA.....	IA.....	BRASILEG COMPANHIA DE SEGUROS S.A.	Ownership.....	..50.000 ...	MAPFRE S.A.	...NO.....	
....							DESARROLLOS HOSPITALARIOS 2024, S.L.	.ESP.....	NIA.....	MAPFRE ESPANA, S.A.	Ownership.....	..49.967 ...	MAPFRE S.A.	...NO.....	
....							MAP SL EROPEAN INVEST SARL	.LUX.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	..6.840 ...	MAPFRE S.A.	...NO.....	
....							MAPFRE AM-IBERIAN EQUITIES	.LUX.....	NIA.....	OTHER GROUP COMPANIES	Ownership.....	..6.587 ...	MAPFRE S.A.	...NO.....	
....							MAPFRE AM-EUROPEAN EQUITIES	.LUX.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	..40.506 ...	MAPFRE S.A.	...NO.....	
....							MAPFRE AM - MULTI-ASSET STRATEGY	.LUX.....	NIA.....	OTHER GROUP COMPANIES	Ownership.....	..11.554 ...	MAPFRE S.A.	...NO.....	
....							PROYECTO INSIGNIA	.MEX.....	NIA.....	GRUPO CORPORATIVO LML S.A.	Ownership.....	..99.477 ...	MAPFRE S.A.	...NO.....	
....							INSIGNIA LIFE	.MEX.....	IA.....	PROYECTO INSIGNIA	Ownership.....	..100.000 ...	MAPFRE S.A.	...NO.....	
....							HOSPITAL GENERAL MDS, S.A.	.PAN.....	NIA.....	MAPFRE PANAMA, S.A.	Ownership.....	..100.000 ...	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.

STATEMENT AS OF JUNE 30, 2025 OF THE AMERICAN COMMERCE INSURANCE COMPANY

PART 1 - LOSS EXPERIENCE

Line of Business		Current Year to Date			4
		1 Direct Premiums Earned	2 Direct Losses Incurred	3 Direct Loss Percentage	Prior Year to Date Direct Loss Percentage
1.	Fire	1,698,220	391,966	23.1	(50.9)
2.1	Allied Lines	53,208	28,494	53.6	90.5
2.2	Multiple peril crop	0	0	0.0	0.0
2.3	Federal flood	1,959,100	4,596	0.2	192.9
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	31,091,770	18,427,661	59.3	35.8
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	13,148	3,900	29.7	52.9
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	(85)	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	4,492,792	81,956	1.8	7.9
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)	222,092	103,740	46.7	(12.3)
19.2	Other private passenger auto liability	22,107,648	14,721,460	66.6	66.5
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	17,271,135	8,591,791	49.7	64.9
21.2	Commercial auto physical damage	0	0	0.0	0.0
22.	Aircraft (all perils)	13,731,183	7,287,496	53.1	46.0
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	92,640,211	49,643,060	53.6	51.3
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

STATEMENT AS OF JUNE 30, 2025 OF THE AMERICAN COMMERCE INSURANCE COMPANY

PART 2 - DIRECT PREMIUMS WRITTEN

Line of Business		1 Current Quarter	2 Current Year to Date	3 Prior Year Year to Date
1.	Fire	912,595	1,685,231	1,708,349
2.1	Allied Lines	30,114	56,682	44,422
2.2	Multiple peril crop	0	0	0
2.3	Federal flood	850,713	1,660,313	1,809,539
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	19,842,394	34,071,004	30,209,734
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	13,114	21,296	15,363
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	3,483,802	9,122,902	5,489,187
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)	102,511	216,919	248,898
19.2	Other private passenger auto liability	13,143,347	23,680,760	23,877,340
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	10,335,938	18,646,245	17,927,291
21.2	Commercial auto physical damage	0	0	0
22.	Aircraft (all perils)	4,830,336	10,261,419	10,176,769
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	53,544,864	99,422,771	91,506,892
DETAILS OF WRITE-INS				
3401.				0
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 JUNE 30, 2025 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)	2025 Loss and LAE Payments on Claims Reported as of Prior Year-End	2025 Loss and LAE Payments on Claims Unreported as of Prior Year-End	Total 2025 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. 2022 + Prior	29,088	(3,718)	25,370	7,268	26	7,294	18,967	65	(1,872)	17,160	(2,853)	1,937	(916)	
2. 2023	24,320	76	24,396	6,244	7	6,251	18,483	20	(400)	18,103	407	(449)	(42)	
3. Subtotals 2023 + Prior	53,408	(3,642)	49,766	13,512	33	13,545	37,450	85	(2,272)	35,263	(2,446)	1,488	(958)	
4. 2024	37,643	21,078	58,721	22,388	103	22,491	30,220	285	5,099	35,604	14,965	(15,591)	(626)	
5. Subtotals 2024 + Prior	91,051	17,436	108,487	35,900	136	36,036	67,670	370	2,827	70,867	12,519	(14,103)	(1,584)	
6. 2025	XXX	XXX	XXX	XXX	41,352	41,352	XXX	20,146	17,070	37,216	XXX	XXX	XXX	
7. Totals	91,051	17,436	108,487	35,900	41,488	77,388	67,670	20,516	19,897	108,083	12,519	(14,103)	(1,584)	
8. Prior Year-End Surplus As Regards Policyholders	119,498										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. 13.7	2. (80.9)	3. (1.5)	
											Col. 13, Line 7 As a % of Col. 1 Line 8			
											4. (1.3)			

STATEMENT AS OF JUNE 30, 2025 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.

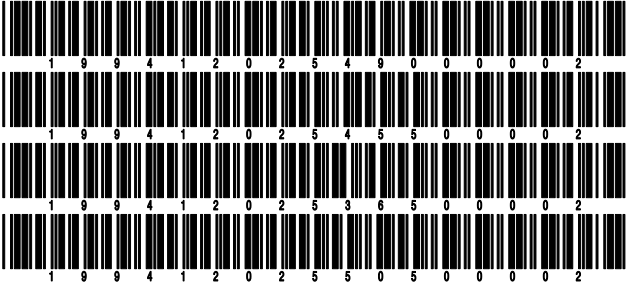
	Response
1. Will the Trusteed Surplus Statement be filed with the state of domicile and the NAIC with this statement?	NO
2. Will Supplement A to Schedule T (Medical Professional Liability Supplement) be filed with this statement?	NO
3. Will the Medicare Part D Coverage Supplement be filed with the state 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.	YES

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	2
	Year to Date	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	2
	Year to Date	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	2
	Year to Date	Prior Year Ended December 31
1. Book/adjusted carrying value, December 31 of prior year	0	
2. Cost of acquired:		
2.1 Actual cost at time of acquisition	12,831	
2.2 Additional investment made after acquisition	0	
3. Capitalized deferred interest and other	0	
4. Accrual of discount	4	
5. Unrealized valuation increase/(decrease)	(7,490)	
6. Total gain (loss) on disposals	0	
7. Deduct amounts received on disposals	1,241	
8. Deduct amortization of premium, depreciation and proportional amortization	0	
9. Total foreign exchange change in book/adjusted carrying value	0	
10. Deduct current year's other than temporary impairment recognized	0	
11. Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5+6-7-8+9-10)	4,104	0
12. Deduct total nonadmitted amounts	0	
13. Statement value at end of current period (Line 11 minus Line 12)	4,104	0

SCHEDULE D - VERIFICATION

Bonds and Stocks

	1	2
	Year to Date	Prior Year Ended December 31
1. Book/adjusted carrying value of bonds and stocks, December 31 of prior year	218,298,357	201,877,850
2. Cost of bonds and stocks acquired	46,816,846	65,985,559
3. Accrual of discount	157,379	245,084
4. Unrealized valuation increase/(decrease)	656,260	768,731
5. Total gain (loss) on disposals	(983,404)	(640,553)
6. Deduct consideration for bonds and stocks disposed of	16,646,260	49,133,501
7. Deduct amortization of premium	430,154	753,933
8. Total foreign exchange change in book/adjusted carrying value	0	
9. Deduct current year's other than temporary impairment recognized	0	50,880
10. Total investment income recognized as a result of prepayment penalties and/or acceleration fees	0	
11. Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5-6-7+8-9+10)	247,869,024	218,298,357
12. Deduct total nonadmitted amounts	0	
13. Statement value at end of current period (Line 11 minus Line 12)	247,869,024	218,298,357

STATEMENT AS OF JUNE 30, 2025 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
ISSUER CREDIT OBLIGATIONS (ICO)								
1. NAIC 1 (a)	150,485,413	4,559,626	6,446,416	(88,178)	150,485,413	148,510,445	0	169,449,776
2. NAIC 2 (a)	35,378,682	3,070,740	1,938,469	441	35,378,682	36,511,394	0	31,946,811
3. NAIC 3 (a)	0	0	0	0	0	0	0	0
4. NAIC 4 (a)	0	0	0	0	0	0	0	0
5. NAIC 5 (a)	0	0	0	0	0	0	0	0
6. NAIC 6 (a)	0	0	0	0	0	0	0	0
7. Total ICO	185,864,095	7,630,366	8,384,885	(87,737)	185,864,095	185,021,839	0	201,396,587
ASSET-BACKED SECURITIES (ABS)								
8. NAIC 1	18,150,429	9,944,071	763,329	(12,826)	18,150,429	27,318,345	0	0
9. NAIC 2	0	0	0	0	0	0	0	0
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 ABS	18,150,429	9,944,071	763,329	(12,826)	18,150,429	27,318,345	0	0
PREFERRED STOCK								
15. NAIC 1	0	0	0	0	0	0	0	0
16. NAIC 2	2,545,320	0	0	1,140	2,545,320	2,546,460	0	2,580,180
17. NAIC 3	0	0	0	0	0	0	0	0
18. NAIC 4	0	0	0	0	0	0	0	0
19. NAIC 5	0	0	0	0	0	0	0	0
20. NAIC 6	483,060	0	0	23,937	483,060	506,997	0	506,997
21. Total Preferred Stock	3,028,380	0	0	25,077	3,028,380	3,053,457	0	3,087,177
22. Total ICO, ABS & Preferred Stock	207,042,904	17,574,437	9,148,214	(75,486)	207,042,904	215,393,641	0	204,483,764

(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 \$0 ; 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	Prior Year Value	Actual Cost	Interest Collected Year-to-Date	Paid for Accrued Interest Year-to-Date
7709999999 Totals		XX			

NONE

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	3,860,647	
2. Cost of short-term investments acquired	0	3,860,647
3. Accrual of discount	0	0
4. Unrealized valuation increase/(decrease)	0	0
5. Total gain (loss) on disposals	51,133	0
6. Deduct consideration received on disposals	3,911,780	0
7. Deduct amortization of premium	0	0
8. Total foreign exchange change in book/adjusted carrying value	0	0
9. Deduct current year's other than temporary impairment recognized	0	0
10. Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5-6-7+8-9)	0	3,860,647
11. Deduct total nonadmitted amounts	0	0
12. Statement value at end of current period (Line 10 minus Line 11)	0	3,860,647

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		0
4. Unrealized valuation increase/(decrease)		0
5. Total gain (loss) on disposals		0
6. Deduct consideration received on disposals		1,975,227
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)	0	0
11. Deduct total nonadmitted amounts		0
12. Statement value at end of current period (Line 10 minus Line 11)	0	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

[illegible][illegible]

XXX

SCHEDULE BA - PART 3

1 CUSIP Identification	2 Name or Description	Location		5 Name of Purchaser or Nature of Disposal	6 Date Originally Acquired	7 Disposal Date	8 Book/ Adjusted Carrying Value Less Encumbrances, Prior Year	Change in Book/Adjusted Carrying Value						15 Book/ Adjusted Carrying Value Less Encumbrances on Disposal	16 Consi- deration	17 Foreign Exchange Gain (Loss) on Disposal	18 Realized Gain (Loss) on Disposal	19 Total Gain (Loss) on Disposal	20 Investment Income	
		3 City	4 State					9 Unrealized Valuation Increase/(Decrease)	10 Current Year's (Depreciation) or (Amortization)/Accretion	11 Current Year's Other Than Temporary Impairment Recognized	12 Capitalized Deferred Interest and Other	13 Total Change in Book/Adjusted Carrying Value (9+10-11+12)	14 Total Foreign Exchange Change in Book/Adjusted Carrying Value							
590218-AF-0	NL MTG INV TR 2006-F1			PAYDOWN OF PRINCIPAL	...03/28/2025 ...	...06/25/2025 ...	0	0	3	0	0	3	0	1,240	1,240	0	0	0	21	
4499999. Residual Tranches or Interests with Underlying Assets Having Characteristics of Bonds - Unaffiliated								0	0	3	0	0	3	0	1,240	1,240	0	0	0	21
6899999. Total - Unaffiliated								0	0	3	0	0	3	0	1,240	1,240	0	0	0	21
6999999. Total - Affiliated								0	0	0	0	0	0	0	0	0	0	0	0	0
.....																				
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.....																				
.....																				
.....																				
.....																				
7099999 - Totals								0	0	3	0	0	3	0	1,240	1,240	0	0	0	21

70999999 - Totals

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STATEMENT AS OF JUNE 30, 2025 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
CUSIP Identification	Description	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 Administrative Symbol
91282C-MU-2	U.S. TREASURY NOTE	04/04/2025	FHN FINANCIAL		508,398	500,000	383	1.A
0019999999	Subtotal - Issuer Credit Obligations - U.S. Government Obligations (Exempt from RBC)				508,398	500,000	383	XXX
010268-EJ-5	ALABAMA FEDERAL AID HIGHWAY FIN	04/14/2025	EXCHANGE		593,440	595,000	0	1.B FE
010268-EQ-9	ALABAMA FEDERAL AID HIGHWAY FIN	04/14/2025	EXCHANGE		1,401,319	1,405,000	0	1.C FE
0059999999	Subtotal - Issuer Credit Obligations - Municipal Bonds - Special Revenues				1,994,759	2,000,000	0	XXX
03027X-CC-2	AMERICAN TOWER CORP	06/25/2025	GOLDMAN SACHS		1,023,400	1,000,000	23,479	2.B FE
05565E-CW-3	BMW US CAPITAL LLC	06/25/2025	RBC CAPITAL MARKETS		1,010,350	1,000,000	12,535	1.F FE
49338C-AD-5	KEYSPAN GAS EAST CORP	06/10/2025	FHN FINANCIAL		2,047,340	2,000,000	31,635	2.A FE
771196-CG-5	ROCHE HOLDINGS INC	05/09/2025	FHN FINANCIAL		1,046,120	1,000,000	27,293	1.C FE
0089999999	Subtotal - Issuer Credit Obligations - Corporate Bonds (Unaffiliated)				5,127,210	5,000,000	94,942	XXX
0489999999	Total - Issuer Credit Obligations (Unaffiliated)				7,630,367	7,500,000	95,325	XXX
0499999999	Total - Issuer Credit Obligations (Affiliated)				0	0	0	XXX
0509999997	Total - Issuer Credit Obligations - Part 3				7,630,367	7,500,000	95,325	XXX
0509999998	Total - Issuer Credit Obligations - Part 5				XXX	XXX	XXX	XXX
0509999999	Total - Issuer Credit Obligations				7,630,367	7,500,000	95,325	XXX
3140XC-RH-3	FN FMB587	05/01/2025	RWBAIRD		2,442,664	2,613,786	2,541	1.A
1039999999	Subtotal - Asset-Backed Securities - Financial Asset-Backed - Self-Liquidating - Agency Residential Mortgage-Backed Securities - Not/Partially Guaranteed (Not Exempt from RBC)				2,442,664	2,613,786	2,541	XXX
00791Y-AA-6	AGL 2025-42A A1	05/28/2025	CONNING		375,000	375,000	0	1.A FE
03331T-AU-4	ANQHC 2023-26A CR	05/21/2025	CONNING		375,000	375,000	0	1.F FE
68627C-AE-3	ANTOR 2025-5A C	05/23/2025	CONNING		375,000	375,000	0	1.A FE
03990K-AE-1	ARES 2025-77A B	05/30/2025	CONNING		375,000	375,000	0	1.C FE
06764L-AB-2	BABSN 2025-2A A2	05/23/2025	CONNING		375,000	375,000	0	1.A FE
05876G-AG-9	BALLY 2025-29A B	06/06/2025	CONNING		375,000	375,000	0	1.F FE
08187B-AC-7	BSP 2025-40A B	05/22/2025	CONNING		375,000	375,000	0	1.C FE
12516E-AG-6	CBAMR 2017-4A BR	06/06/2025	CONNING		375,000	375,000	0	1.C FE
17180W-AG-8	CIFC 2018-2A CR	05/21/2025	CONNING		376,406	375,000	1,959	1.F FE
29004K-AG-5	ELM43 2025-6A C	06/05/2025	CONNING		375,000	375,000	0	1.F FE
36320H-AN-9	GALXY 2023-31A BR	05/19/2025	CONNING		375,000	375,000	0	1.C FE
39355H-AE-8	GNAPK 2021-2A BR	05/22/2025	CONNING		375,000	375,000	0	1.C FE
46604C-AL-0	IVYH 20A A1R	05/13/2025	CONNING		375,000	375,000	0	1.A FE
481954-AA-3	KKR 2025-57A A	05/23/2025	CONNING		375,000	375,000	0	1.G FE
56817G-AN-1	MDPK 2023-63A A1R	05/22/2025	CONNING		375,000	375,000	0	1.A FE
67121N-AJ-1	OAKC 2023-15RA C	06/04/2025	CONNING		375,000	375,000	0	1.F FE
670891-AN-0	QCP 2023-28A CR	06/18/2025	CONNING		375,000	375,000	0	1.F FE
83013B-AC-0	SIXST 2025-29A B	06/05/2025	CONNING		375,000	375,000	0	1.C FE
92330D-AN-9	VENTR 2023-47A A1R	05/21/2025	CONNING		375,000	375,000	0	1.A FE
97316R-AN-5	WINDR 2023-1A A1R	06/04/2025	CONNING		375,000	375,000	0	1.A FE
1099999999	Subtotal - Asset-Backed Securities - Financial Asset-Backed - Self-Liquidating - Non-Agency - CLOs/CBOs/CDOs (Unaffiliated)				7,501,406	7,500,000	1,959	XXX
1889999999	Total - Asset-Backed Securities (Unaffiliated)				9,944,070	10,113,786	4,500	XXX
1899999999	Total - Asset-Backed Securities (Affiliated)				0	0	0	XXX
1909999997	Total - Asset-Backed Securities - Part 3				9,944,070	10,113,786	4,500	XXX
1909999998	Total - Asset-Backed Securities - Part 5				XXX	XXX	XXX	XXX
1909999999	Total - Asset-Backed Securities				9,944,070	10,113,786	4,500	XXX
2009999999	Total - Issuer Credit Obligations and Asset-Backed Securities				17,574,437	17,613,786	99,825	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
02209S-10-3	ALTRIA GROUP INC	05/21/2025	Wellington	577,000	33,470		0	
035710-83-9	ANNALY CAPITAL MANAGEMENT INC	06/25/2025	GOLDMAN TB	50,000,000	967,900		0	
110122-10-8	BRISTOL MYERS SQUIBB CO	04/10/2025	Wellington	218,000	10,900		0	
337932-10-7	FIRSTENERGY CORP	05/21/2025	Wellington	475,000	20,020		0	

STATEMENT AS OF JUNE 30, 2025 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
CUSIP Identification	Description	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
N63745-10-0	LYONDELLBASELL INDUSTRIES	05/28/2025	GOLDMAN TB	20,000.000	1,155,630		0	
717081-10-3	PFIZER INC	04/10/2025	Wellington	756.000	16,267		0	
92343V-10-4	VERIZON COMMUNICATIONS INC	05/21/2025	Wellington	857.000	37,090		0	
963320-10-6	WHIRLPOOL CORP	05/13/2025	GOLDMAN TB	12,000.000	1,021,531		0	
5019999999. Subtotal - Common Stocks - Industrial and Miscellaneous (Unaffiliated) Publicly Traded					3,262,808	XXX	0	XXX
5989999997. Total - Common Stocks - Part 3					3,262,808	XXX	0	XXX
5989999998. Total - Common Stocks - Part 5					XXX	XXX	XXX	XXX
5989999999. Total - Common Stocks					3,262,808	XXX	0	XXX
5999999999. Total - Preferred and Common Stocks					3,262,808	XXX	0	XXX
6009999999 - Totals					20,837,245	XXX	99,825	XXX

STATEMENT AS OF JUNE 30, 2025 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	Change In Book/Adjusted Carrying Value					15	16	17	18	19	20	21
									10	11	12	13	14							
CUSIP Ident- ification	Description	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 Recog- nized	Total Change in Book/ Adjusted Carrying Value (10 + 11 - 12)	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
1909999998. Total - Asset-Backed Securities - Part 5					XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX
1909999999. Total - Asset-Backed Securities					763,321	763,320	771,862	518,290	0	(13,378)	0	(13,378)	0	763,334	0	(13)	(13)	9,803	XXX	XXX
2009999999. Total - Issuer Credit Obligations and Asset-Backed Securities					9,199,638	9,263,320	9,252,326	6,935,623	0	3,629	0	3,629	0	9,148,214	0	51,424	51,424	176,348	XXX	XXX
4509999997. Total - Preferred Stocks - Part 4					0	XXX	0	0	0	0	0	0	0	0	0	0	0	0	XXX	XXX
4509999998. Total - Preferred Stocks - Part 5					XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX
4509999999. Total - Preferred Stocks					0	XXX	0	0	0	0	0	0	0	0	0	0	0	0	XXX	XXX
5989999997. Total - Common Stocks - Part 4					0	XXX	0	0	0	0	0	0	0	0	0	0	0	0	XXX	XXX
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					9,199,638	XXX	9,252,326	6,935,623	0	3,629	0	3,629	0	9,148,214	0	51,424	51,424	176,348	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	Restricted Asset 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								
Bank of America					(3,854,525)	(4,032,388)	(3,498,142)	XXX.
240 Greenwich Street, New York, NY 10286		4.230	19,390		314,570	(1,383,157)	4,050,948	XXX.
The Bank of New York Mellon ..								
100 E.Broad St, Columbus, OH 43216					135,776	201,642	241,173	XXX.
JPMorgan Chase								
One Financial Center, Boston, MA 02111		4.190	47,301		6,108,732	3,826,037	2,334,565	XXX.
BlackRock 30								
500 Salem Street, Smithfield, RI 02917		4.230	110,368		17,059,226	16,036,970	7,669,031	XXX.
Fidelity Govn't 2642								
0199998. Deposits in ... depositories that do not exceed the allowable limit in any one depository (See instructions) - Open Depositories	XXX	XXX						XXX
0199999. Totals - Open Depositories	XXX	XXX	177,059	0	19,763,779	14,649,104	10,797,575	XXX
0299998. Deposits in ... depositories that do not exceed the allowable limit in any one depository (See instructions) - Suspended Depositories	XXX	XXX						XXX
0299999. Totals - Suspended Depositories	XXX	XXX	0	0	0	0	0	XXX
0399999. Total Cash on Deposit	XXX	XXX	177,059	0	19,763,779	14,649,104	10,797,575	XXX
0499999. Cash in Company's Office	XXX	XXX	XXX	XXX				XXX
.....								
.....								
.....								
.....								
.....								
.....								
.....								
.....								
0599999. Total - Cash	XXX	XXX	177,059	0	19,763,779	14,649,104	10,797,575	XXX

Schedule E - Part 2 - Cash Equivalents - Investments Owned End of Current Quarter

N O N E