Euro Insurances DAC (LPINS)

Solvency and Financial Condition Report (“SFCR”)
2023

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Executive Summary

This Solvency and Financial Condition Report ("SFCR") has been prepared in line with the requirements of the Solvency II ("SII") Regulations, to assist clients of Euro Insurances DAC ("the Company" or "LPINS") and other stakeholders in understanding the nature of our business, how it is managed, and its solvency position.

The structure of this SFCR follows the requirements set forth in Annex XX of the Solvency II Delegated Acts and consists of the following sections: (A) Business and Performance, (B) System of Governance, (C) Risk Profile, (D) Valuation for Solvency II Purposes and (E) Capital Management.

a) Summary Section A: Business and Performance

In May 2023, ALD S.A. completed its acquisition of the Company's sole shareholder, LeasePlan Corporation N.V, from a consortium led by TDR Capital. The completion of this transaction resulted in ALD S.A., through its ownership of LeasePlan Corporation N.V, owning the Company.

ALD S.A. also owns a reinsurer, ALD Re, based in Dublin, Ireland. Both the Company and ALD Re are authorised and regulated by the Central Bank of Ireland, the Company as a non-life insurer and ALD Re as a reinsurer. Both entities (re)insure risks in respect of motor vehicles.

During 2023 the Company and ALD Re worked together to determine the best strategy and target operating model for the two entities. This work concluded that a direct insurance model with a single insurance company was the optimal solution. It was determined that this target operating model would be achieved by means of a merger of the business of ALD Re into that of the Company. In the period to 31 December 2023, work was progressed in respect of the regulatory and legal approvals required to give effect to the proposed merger of ALD Re into the Company.

As at 31 December 2023, the Company remained a wholly owned subsidiary of LeasePlan Corporation NV, Gustav Mahlerlaan 360, 1082 ME Amsterdam. In turn, LeasePlan Corporation is an indirect subsidiary of ALD S.A.

During the year, the Company insured the motor damage and third-party liability risks of group companies and third-party clients. In addition, it provided a range of ancillary motor-related covers.

On 1 January 2023, the IFRS 17 'Insurance Contracts' accounting standard became effective, replacing IFRS 4 'Insurance Contracts'. In accordance with the new standard, the Company's 2022 figures have been restated. The IFRS 17 restatement includes the impact of transition and opening balance adjustments.

The Company's profit after tax for the financial year 2023 was €50.5m. The following table summarises the IFRS financial performance of the Company for the reporting period ending 31 December 2023:

Financial Performance as at 31st December 2023 (€'000)	
	Amount
Underwriting Performance Investment Performance Expected Credit Loss Other Income and Expenses	50,557 12,400 93 (5,014)
Net Profit before Tax	**58,036**
Unrealised investment gains	0
Comprehensive Income	**58,036**
Corporation Tax	(7,502)
Comprehensive Income after Tax	**50,534**

In 2023 the Company achieved underwriting income of €50.6m, net investment income of €12.4m and incurred other income and expenses not related to underwriting or investment income of -€5m.

Underlying profit after tax in 2023 was lower than in 2022. This was due to the fact that 2022 benefitted from lower claim frequency in the post-Covid 19 period and due to limited inflation impact in 2022. The 2023 result was in line with expectations. Strong performance across several jurisdictions was somewhat offset by the ongoing impact of higher inflation, claim frequency returning to pre-Covid 19 levels in most jurisdictions and to a lesser extent the Ukrainian Crisis.

During 2023, the Company, like the LeasePlan group, maintained a focus on inflation mitigation. The Company increased monitoring of its claims costs including frequent communication with LeasePlan entities and claim handlers to monitor developments at individual country level. The Company's robust renewal process utilised both performance and inflation-based premium adjustments. The Company engaged with its group entities before and during the renewal process to ensure that appropriate premium increases were achieved for 2024.

The Company's investment income for 2023 was €12.4m. Investment return improved significantly in 2023 due to a strong interest rate environment and an expansion of the Company's bond portfolio. Overhead costs for 2023 of €11.8m were higher than the previous year due to higher staff costs driven by increased headcount and professional fees to support the proposed merger with ALD Re.

Refer to Section A for further detail relating to business and performance.

b) Summary Section B: System of Governance

The Board's responsibility includes ensuring that an appropriate system of governance is in place throughout the Company. To discharge this responsibility, the Board has established frameworks for risk management and internal control using the "Three Lines of Defence" model, as follows:

- **1st Line of Defence (Business Operations):** Business management is responsible for the identification and assessment of risks and the implementation and enforcement of controls.

- **2nd Line of Defence (Oversight & Challenge):** Board sub-committees and Control Functions provide key oversight of activities in business operations and challenge the completeness/accuracy of risk identification, assessment and controls.

- **3rd Line of Defence (Independent Assurance):** Internal Audit provides independent and objective assurance on the robustness of the Risk Management System, and the appropriateness and effectiveness of internal controls.

In addition, the Company has adopted a Fit and Proper Person Policy and operates a Code of Conduct for all staff. In particular, all persons performing Control Functions (CFs) must be competent and capable demonstrated through having obtained appropriate qualifications and skills, having sound knowledge of the Company's business, understanding of the applicable regulatory and legal environment and maintaining compliance with the Central Bank of Ireland's Minimum Competency Requirements where applicable. The Company operates a range of controls over its outsourcing.

Management considers the Company to have a robust system of governance appropriate to the nature, scale and complexity of its operations.

Refer to Section B for further detail on the Company's system of governance.

c) Summary Section C: Risk Profile

The Company's risk landscape comprises, at a minimum, underwriting risk, market risk, credit risk, operational risk and liquidity risk that arise as a result of doing business. These risks are assessed within the Company using an entity level risk assessment conducted by management, process level assessments conducted by process owners and a strategic risk assessment conducted by the Board Risk Committee.

For those risk types managed through the holding of capital, the Company measures and monitors its risk profile based on the Solvency Capital Requirement ("SCR"). A summary of the Company's SCR by primary risk type as at 31 December 2023 is set out below (please note that the diversification benefit explains the summation of the individual components exceeding the overall requirement):

€'000	LPINS Capital Requirements
Market risk	29,560
Counterparty default risk	16,640
Non-life underwriting risk	113,535
Health underwriting risk	41,508
Operational risk	8,675
Life underwriting risk	666
LACDT*	(22,812)
SCR	**129,270**

*LACDT refers to the Loss Absorbing Capacity of Deferred Taxes.
Please note that diversification benefit explains the summation of the individual components exceeding the overall requirement in the above table.

The Company's largest risk charge is for non-life underwriting risk. This charge represents the risk associated with the writing of insurance business and the settling of claim provisions. Underwriting risk is mitigated through a combination of geographical diversification, underwriting key risk indicators, risk metrics, risk appetite statements and a process-level risk and control self-assessment to assess, monitor and report upon underwriting risk. Underwriting risk is also mitigated through the purchase and use of reinsurance.

Although no additional capital is deemed necessary to cover liquidity or other risks, the position regarding the need to hold capital in respect of liquidity or other risks is regularly monitored. A number of mitigating actions relevant to liquidity risk are in place including performing daily and monthly cash flow forecasts to monitor liquidity positions, performing daily monitoring of bank accounts against the monthly cash flow forecast and short matching assets to cover some longer tail technical reserve payment requirements.

Refer to Section C for further details on the Company's risk profile.

d) Summary Section D: Valuation for Solvency Purposes

Assets, technical provisions and other liabilities are valued in the Company's Solvency II Balance Sheet in accordance with the Solvency II Regulations. The principle that underlies the valuation methodology for Solvency II purposes is that assets and liabilities are valued at the amount for which they could be exchanged, transferred, or settled by knowledgeable and willing third parties in an arm's length transaction (often referred to as the "market consistent" value of assets).

The following table presents a summary of the Solvency II valuation of assets and liabilities compared to the statutory accounts as at 31 December 2023.

Comparison of valuation of assets and liabilities under Solvency II vs statutory accounts as at 31st December 2023 (€'000)		
	Solvency II	**Statutory Accounts Valuation**
Assets		
Total Assets	**747,910**	**744,096**
Liabilities		
Technical Provisions	310,981	319,969
Other liabilities	100,640	111,373
Total Liabilities	**411,621**	**431,342**
Excess of assets over liabilities	**336,289**	**312,754**

The main differences between the valuation bases, methods and assumptions used by the Company in the two reporting bases are outlined in Section D.

e) Summary Section E: Capital Management

The strategic objectives of capital management within the Company are to ensure regulatory compliance, including maintaining adequate levels of capital, to maintain sufficient liquidity, to manage and allocate capital efficiently, and finally to ensure that all of the above objectives are consistent with the continuation of profitable business in line with the Company's strategy.

The following table compares the solvency position of the Company, assessed using the Standard Formula as at 31 December 2023, to the position as at 31 December 2022:

LPINS Solvency Position (€'000)	At December 2023	At December 2022
Eligible Own Funds	336,289	311,569
Solvency Capital Requirement	129,270	121,018
SCR Coverage	260%	257%
Minimum Capital Requirement	46,089	40,893
MCR Coverage	730%	762%

All of the Company's own funds are classified as Tier 1 and are available to cover the SCR and the MCR.

There were no instances of non-compliance with the MCR and the SCR during the reporting period.

Refer to Section E for further details on the Company's capital management.

f) Summary: Material Changes over the Reporting Period

This report relates to the financial year ending 31 December 2023. Please refer to Section A for significant events during the period covered by this report. There were no other material changes to the areas described in this report over the reporting period.

A Business and Performance

1. Business and External Environment

a) Name and Legal Form

Euro Insurances DAC, trading as LeasePlan Insurance, has its office address at LeasePlan House, Ground Floor, Central Park, Leopardstown, Dublin 18, Ireland.

The Company had 57 FTEs at 31 December 2023.

b) Supervisor and External Auditor

The Central Bank of Ireland ("CBI") is responsible for the financial supervision of the Company.

The CBI's address is Central Bank of Ireland, New Wapping Street, North Wall Quay, Dublin 1, Ireland.

The Company's external auditors are KPMG Ireland with an address at 1 Harbourmaster Place, International Financial Services Centre, Dublin 1, Ireland.

The Company's financial year-end is 31 December each year and the Company reports in Euro.

c) Position within the Group

The Company is a wholly-owned direct subsidiary of LeasePlan Corporation N.V., with an address at Gustav Mahlerlaan 360, 1082 ME, Amsterdam, The Netherlands.

In May 2023, ALD S.A. completed its acquisition of LeasePlan Corporation N.V, from a consortium led by TDR Capital. The completion of this transaction resulted in ALD S.A., through its ownership of LeasePlan Corporation N.V, owning the Company. ALD S.A. is majority-owned by Société Générale S.A.

The Company had no subsidiaries or branches at year-end 2023. In January 2024 the Company received authorisation from the Prudential Regulatory Authority to establish a third-country branch in the UK.

d) Material Lines of Business and Geographical Areas

The Company insures / reinsures the motor damage and third-party liability risks of group companies and third-party clients. In addition, it provides cover for ancillary motor and leasing related risks.

The Company mainly deals with group entities in Europe under the freedom of services model. As the Company's business is predominately in relation to the leased vehicle fleets of its leasing affiliates, the Company's business is predominately with related parties, including related party policyholders, intermediaries and service providers. The Company's related parties during the year included the entities set out in Appendix II.

e) Significant Events over the Period

The ALD S.A. group includes ALD Re, a reinsurer based in Dublin, Ireland. Both the Company and ALD Re are authorised and regulated by the Central Bank of Ireland, the Company as a non-life insurer and ALD Re as a reinsurer. Both entities (re)insure risks in respect of motor vehicles.

During 2023 the Company and ALD Re worked together to determine the best strategy and target operating model for the two entities. This work concluded that a direct insurance model with a single insurance company was the optimal solution. It was determined that this target operating model would be achieved by means of a merger of the business of ALD Re into that of the Company. In the period to 31 December 2023, work was progressed in respect of the regulatory and legal approvals required to give effect to the proposed merger of ALD Re into the Company.

In the current heightened inflationary environment, the Company acknowledges the risk to its profitability posed by the impact of inflation. In order to assess exposure to inflation, the Company has undertaken a scenario analysis of the potential impact of varying levels of inflation at different durations. Additionally, the Company has increased monitoring of its average claim costs. This includes country level monitoring in conjunction with its LeasePlan affiliates and ensuring that the Company has access to timely data on inflation related developments in its markets. The Company continues to engage with its LeasePlan affiliates in relation to the continued adoption of mitigants to address inflation related risks.

On 1 January 2023, the IFRS 17 ‘Insurance Contracts’ accounting standard became effective, replacing IFRS 4 ‘Insurance Contracts’. In accordance with the new standard, the Company’s 2022 figures have been restated. The IFRS 17 restatement includes the impact of transition and opening balance adjustments.

2. Underwriting Performance

a) Underwriting Performance by Material Line of Business / Geographical Area

The Company insures / reinsures the motor damage and third-party liability risks of group companies and third-party clients. In addition, it provides cover for ancillary motor and leasing related risks.

Please find below an overview of underwriting income by geographical area:

Underwriting Income by Geographical Region (€'000)		
Region	**2023**	**2022**
Central Europe (Belgium, France, Austria, Germany, Luxembourg)	5,273	11,098
Eastern Europe (Czech Republic, Poland, Hungary, Romania, Slovakia)	17,223	16,499
Northern Europe (Norway, Netherlands, Denmark, Sweden, Finland, Ireland, United Kingdom)	6,493	10,349
Southern Europe (Italy, Spain, Portugal, Greece)	21,584	31,715
Rest of the world (Australia, New Zealand)	(16)	762
Total	**50,557**	**70,423**

During 2023, the overall underwriting income decreased from €70.4m to €50.6m. The main drivers of the Company's 2023 performance are described below.

The reduction in underwriting income in the Central Europe region in 2023 was mainly driven by deterioration in the performance of the Own Damage (OD) program in Germany and both the OD & Third Party Liability (TPL) programs in Austria. Both frequency and severity increased in these jurisdictions. All other countries in Central Europe were broadly in line with 2022.

The result for the Eastern Europe region for 2023 is higher than the 2022 result. There were strong results in a number of jurisdictions which were partially offset by a lower result in the Czech Republic driven by the cessation of most of the Company's programs, including the OD program, in that country following the divestment of LeasePlan Czech Republic from the LeasePlan group. The strong result in Poland was due to lower claims frequency and strong cost control. Strong premium increases in Hungary and Romania compensated for increases in claims costs in these countries.

2023 underwriting income in Northern Europe was significantly lower than that of 2022. This was driven by the impact of inflation on OD programs in Scandinavia and to a lesser extent a deterioration in large claims experience in the Netherlands.

In Southern Europe, 2023 underwriting income of €21.6m was €10.1m lower than that of 2022. This was due to a deterioration in the performance of the TPL program in Greece, large claims experience in Spain and the ongoing run-off of the Company's Italian TPL book.

The rest of the world relates to the run-off of the Company's Australia and New Zealand business.

During 2023, the Company observed an uplift in OD costs and Catastrophe ("CAT") claims. The impact of a series of significant CAT claims in Italy during 2023 was mitigated by the Company's reinsurance arrangements . During 2023, the Company, like the LeasePlan group, maintained a focus on inflation mitigation. The Company increased monitoring of its claims costs including frequent communication with LeasePlan entities and claim handlers to monitor developments at individual country level. The Company's robust renewal process utilised both performance and inflation-based premium adjustments. The Company engaged with its group entities before and during the renewal process to ensure that appropriate premium increases were achieved for 2024.

The underwriting income figures above exclude non-IFRS 17 overhead expenses and investment income.

The following is an overview of underwriting income by Solvency II Line of Business ("LOB"):

Underwriting Income by SII Line of Business (€'000)		
Line of Business	**2023**	**2022**
Income protection	6,169	6,202
Motor vehicle liability	23,818	31,809
Other motor	8,227	17,771
Fire and other damage	318	370
Legal expenses	654	1,201
Assistance	1,713	1,554
Miscellaneous financial loss	9,675	10,753
Other motor (proportional reinsurance)	(17)	762
Total	**50,557**	**70,423**

Underwriting income for the Income Protection line of business for 2023 is €6.2m. This is consistent with 2022.

Underwriting income for the Motor Vehicle Liability line of business for 2023 of €23.8m is lower than that for 2022. This is mainly due to claims frequency returning to pre-Covid levels, inflation and a number of large claims in the Netherlands and Spain.

The Other Motor line of business saw a reduction of €9.5m in underwriting income compared to 2022. This reduction is mainly due to claims frequency returning to pre-Covid levels and an uplift in claims costs due to inflation.

The underwriting income figures above exclude non-technical (IFRS 17) overhead expenses and investment income.

3. Investment Performance

a) Investment Performance by Asset Class

At the end of 2023, the Company held €587m (2022 €552m) in investments as valued on an IFRS basis. Net investment profit relating to deposits during 2023 was €10.8m. Net investment income relating to bonds was €1m.

During the reporting period interest rates on deposits improved. This had a positive impact on the Company's investment return for the period. There were no management or transaction costs associated with the placement of the deposits.

The Company holds a portfolio of bonds. At the end of 2023, the Company held c.€84.7m in sovereign and corporate bonds. The Company's bond portfolio is subject to management charges.

The Company's bond portfolio comprises counterparties with a minimum credit rating of investment grade for an individual holding and a target rating for the overall bond portfolio of A- as issued by Standard and Poor's for corporate bonds and Moody's for government bonds.

The following table compares the Company's investment performance in 2023 with that of 2022:

LPINS Investment Performance (€'000)		
	2023	**2022**
Deposits & Bonds		
Investment Income	11,785	(458)
Deposits	*10,787*	*(539)*
Bonds	*998*	*82*
FX Gains/Losses	*0*	*0*

Bonds held by the Company are valued on an amortised cost basis under IFRS with an IFRS 9 adjustment for Expected Credit Loss. No valuation gains or losses are recognised in the profit and loss or equity. Under Solvency II, the bonds are valued at their fair value and any changes in this value will impact the level of assets held by the Company.

b) Investments in Securitisations

The Company holds all funds in deposits, in cash accounts or in bonds. The Company does not hold any securitised investments.

4. Performance of other activities

a) Description of Other Material Income / Expenses

The Company had foreign exchange gains in 2023 of €615k (2022 gain of €78k). Operating expenses for 2023 were €11.8m (2022 €10.5m).

LPINS - Performance of Other Material Income/Expenses (€'000)		
	2023	**2022**
Foreign Exchange Gains/Losses	615	78
Operating Expenses	(11,808)	(10,537)

Foreign currency transactions are translated into the functional currency utilising the exchange rates prevailing at the date of the transactions. Foreign exchange gains and losses resulting from the settlement of such transactions, and from the translation at year-end exchange rates of monetary assets and liabilities denominated in foreign currencies, are recognised.

The Company completes a review of the net assets and liabilities in foreign currencies on a monthly basis and reduces any material exposure. The Company does not engage in foreign exchange trading. The 2023 foreign exchange gains were higher than 2022 but were in line with expectations.

Overhead Expenses for 2023 were €11.8m (2022: €10.5m). In 2023 overhead was €1.3m higher than the previous year. This uplift in overhead was mainly due to an increase in staff related costs driven by increased headcount and professional fees to support the proposed merger with ALD Re.

Refer to section D.3 of this report for details on operating leases recognised by the Company.

5. Any other information

In May 2023, ALD S.A. completed its acquisition of the Company's sole shareholder, LeasePlan Corporation N.V, from a consortium led by TDR Capital. The completion of this transaction resulted in ALD S.A., through its ownership of LeasePlan Corporation N.V, owning the Company.

ALD S.A. also owns a reinsurer, ALD Re, based in Dublin, Ireland. Both the Company and ALD Re are authorised and regulated by the Central Bank of Ireland, the Company as a non-life insurer and ALD Re as a reinsurer. Both entities (re)insure risks in respect of motor vehicles.

During 2023 the Company and ALD Re worked together to determine the best strategy and target operating model for the two entities. This work concluded that a direct insurance model with a single insurance company was the optimal solution. It was determined that this target operating model would be achieved by means of a merger of the business of ALD Re into that of the Company. In the period leading to 31 December 2023, work was progressed in respect of the regulatory and legal approvals required to give effect to the proposed merger of ALD Re into the Company.

The Company has no other disclosures to make in respect of the Company's business and performance.

B System of Governance

1. General Information on the System of Governance

a) Board and Sub-Committee Structure

During 2023, the Company was classified as a Medium-Low risk firm under the Central Bank of Ireland's risk-based framework for the supervision of regulated firms, known as Probability Risk and Impact SysteM ("PRISM"). The Company is subject to the Central Bank of Ireland's Corporate Governance Requirements for Insurance Undertakings.

The Company's Board of Directors carry responsibility for the oversight of the business and sets its strategy and risk appetite. At year-end 2023 the Board comprised the following:

- Board of Directors:
    - J. Sutor, Chairman (Non-Executive Director)
    - M. Horsten, (Non-Executive Director)
    - R. Jorna, (Non-Executive Director)
    - G. Owens (Non-Executive Director)
    - A. O'Donnell (Independent Non-Executive Director)
    - S. Fay (Independent Non-Executive Director)
    - V. McMullan (Executive Director)

- Company Secretary:
    - M. Clarke

Mr M. Horsten and Mr. R. Jorna joined the Board in September 2023.

The Board has established a Board Risk Committee and an Audit Committee to assist it in discharging its obligations. At year-end 2023, the Board Risk Committee comprised G. Owens (Chairman), R. Jorna, J. Sutor, A. O'Donnell, S. Fay and V. McMullan. At year-end 2023, the Audit Committee comprised A. O'Donnell (Chairman), S. Fay and G. Owens. Each Committee operates under defined terms of reference and reports to the Board.

The Company is committed to high standards of corporate governance. The Company has appointed an independent Head of Actuarial Function and the Board has completed an annual review of governance and its committee structures in line with the Corporate Governance Requirements for Insurance Undertakings. During the financial year to 31 December 2023, the Board met on eleven occasions, the Audit Committee met on five occasions and the Board Risk Committee met on seven occasions.

The Audit Committee exercises oversight over the Company's Internal Control System and the Board Risk Committee exercises oversight over the Company's Risk Management System.

The Audit Committee assists the Board in discharging its responsibilities in relation to:

a) The integrity of the Company's financial statements,
b) The effectiveness of the Company's compliance and internal controls,

c) The Solvency II Actuarial Function including Actuarial Opinion on Technical Provisions,
d) The effectiveness of the Company's Internal Audit function, and
e) Monitoring the effectiveness, independence and objectivity of the external auditor.

The Board Risk Committee assists the Board in discharging its responsibilities in relation to:

a) The implementation and effectiveness of the Company's Risk Management System,
b) The timely reporting of material deviations from defined risk appetite,
c) Reviewing the risk profile of the Company and monitoring the key risks it faces,
d) Monitoring the performance of outsourced providers, and
e) The Own Risk and Solvency Assessment (ORSA).

There were no material changes in the Company's system of governance during the year.

b) Remuneration Policy and Practice

The Company's Board has adopted a Remuneration Policy. The aim of the policy is to ensure that the Company's remuneration practices do not encourage excessive risk taking, to promote sound and effective risk management and to ensure that the Company's Remuneration Framework is in line with its values and long-term interests. The Company's Remuneration Policy adopts the Group Remuneration Framework of its parent company, LeasePlan Corporation N. V. The LeasePlan Remuneration Framework aims to attract, retain, motivate and reward high-calibre employees to deliver first rate long-term business performance in line with business strategy and approved risk appetite.

LeasePlan Corporation is a Dutch European Central Bank regulated credit institution, and, as a result, the LeasePlan Group Remuneration Framework adopts the remuneration rules applicable to Dutch credit institutions. These rules comprise CRD IV and the Dutch Banking Code, the Regulation on Sound Remuneration Policies pursuant to the Financial Supervision Act 2014, the Dutch Act on Remuneration Policies for Financial Enterprises (Wbfo) and Book 2 of the Dutch Civil Code. The Company, through its Remuneration Policy and the LeasePlan Group Remuneration Framework, is subject to these remuneration rules. In addition, the Company's Remuneration Policy applies the Central Bank of Ireland Guidelines on Variable Remuneration Arrangements for Sales Staff.

In accordance with the Company's Remuneration Policy and the LeasePlan Group Remuneration Framework the following remuneration principles apply to all Company staff:

a) Variable remuneration is performance-related, consists of a mix of financial (maximum 50%) and non-financial elements and reflects both short-term and long-term strategic goals;
b) Variable remuneration targets are specific, measurable, attainable, relevant and time-bound;
c) Variable remuneration in principle cannot exceed 100% of fixed remuneration;
d) Other benefits for staff are provided in line with market practice; and
e) Clawback and malus provisions are applicable to all variable remuneration awarded.

The Company's Remuneration Policy seeks to prevent the taking of more risk than is acceptable under the Company's risk appetite framework. Remuneration plans reward performance at group, company and individual level as appropriate. Employee objectives include a combination of financial and non-financial targets, taking into account ethical behaviour and corporate responsibility. Variable remuneration plans are underpinned by performance management systems in order to reinforce a performance culture.

The Company operates a defined contribution pension scheme which is open to all qualifying employees. Non-executive members of the Board do not participate in the scheme. Certain non-executive members of the Board receive remuneration from the Company in respect of their Board membership.

c) Material Transactions with Connected Persons

The Company is a wholly owned direct subsidiary of LeasePlan Corporation N.V. which in turn is part of the ALD S.A. group. Société Générale S.A. maintains a majority shareholding in ALD S.A. The majority of the Company's business is intra-group, meaning that the Company predominately writes insurance in connection with the motor fleet leasing and management activities of its group affiliates.

Many of the Company's policyholders, intermediaries, claim handlers and other service providers are subsidiaries of LeasePlan Corporation N.V. and some of the Company's bank deposits are with LeasePlan Corporation N. V. During the reporting period the Company continued and/or entered into such transactions in the normal course of its business. The Company paid a dividend of €25m to LeasePlan Corporation N. V. in December 2023.

The Company did not enter into material transactions with members of the Board or persons who exercise a significant influence over the Company.

2. Fit and Proper Requirements

The Company has adopted a Fit and Proper Person Policy and operates a Code of Conduct for all staff. The Company's Fit and Proper Person Policy applies the requirements of the Central Bank of Ireland's Fitness and Probity Standards ("the Standards") and the Central Bank Individual Accountability Framework Act 2023 ("the IAF"). The Company complies with same. Persons who hold controlled functions, including key functions known as Pre-Approval Controlled Functions (PCFs), are subject to assessment and due diligence in accordance with the policy. The Company assesses the fitness and probity of persons prior to their assumption of the controlled function concerned. The fitness and probity of holders of controlled functions is subject to ongoing monitoring and annual review.

All persons performing Pre-Approval Controlled Functions must be competent and capable. The Company requires this to be demonstrated through professional or other qualifications, having obtained appropriate skills, demonstrating a sound knowledge of the Company's business, demonstrating an understanding of the applicable regulatory and legal environment and, where applicable, compliance with the Central Bank of Ireland's Minimum Competency Requirements.

The Company's Fit and Proper assessment process comprises an application form, certification, evidence and verification of professional qualifications, evidence of continuing professional development where relevant, interview, references, record of previous experience, concurrent responsibilities and evidence of compliance with the Minimum Competency Requirements where relevant.

The Company's assessment process also includes probity and financial soundness due diligence which includes completion and signature by the individual of the Company's Probity and Financial Soundness Declaration and background checks and searches as prescribed in the Central Bank of Ireland Fitness and Probity Requirements. Following this due diligence, the Company's Fitness and Probity Committee completes, documents and signs the assessment. In addition, for PCFs the Company's Board performs an assessment and an on-line application is made to the Central Bank of Ireland and the Company certifies as to the outcome of its prior assessment. The proposed holder of a PCF may only commence in his/her role following receipt of approval by the Central Bank of Ireland.

From 29 December 2023, any new proposed holder of PCF, CF1 or CF2 role is subject to the enhanced due diligence aspect of the certification requirements under the IAF, while a process of self-certification applies in respect of CF3 to CF11 role holders. All existing PCFs and CFs are subject to an annual certification process commencing in 2024. The Company continues its preparations to meet the requirements of the Central Bank of Ireland's Senior Executive Accountability Regime (SEAR) in mid-2024.

3. Risk Management System including the Own Risk and Solvency Assessment

a) Risk Management System

The Company's Risk Management System includes clearly defined risk management objectives, written policies for the material risks faced by the Company, a Risk Management Framework to identify, assess, manage, monitor and report on risks and an Own Risk and Solvency Assessment (ORSA) process.

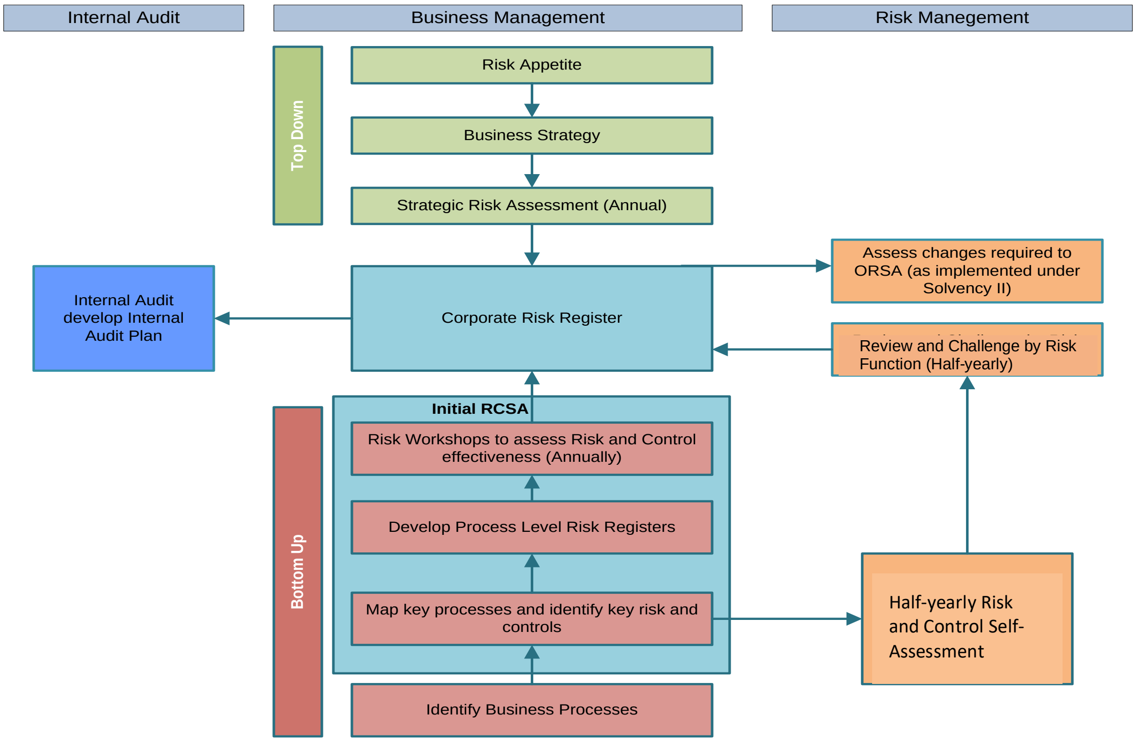
The Company's Risk Management Strategy takes account of the Company's business strategy and seeks to monitor and manage the risks associated with the implementation of the business strategy.

The main objective of the Company's Risk Management System is to ensure that all significant risks are identified, assessed, monitored and controlled within the agreed risk appetite. The framework ensures that the risk management process is explicit and facilitates effective oversight and challenge. Risk control procedures and systems seek to manage, rather than eliminate, the risk of failure to meet business objectives. The Company's Risk Management Framework includes the following processes:

a) Risk Appetite setting and monitoring;
b) Company level Enterprise Risk Assessment;
c) Process level Risk and Control Self-Assessment;
d) Board level Strategic Risk Assessment; and
e) Risk Reporting.

The Company in these processes has adopted the 'Risk Control Cycle' in order to identify, assess, manage, monitor and report on the risks to which it is exposed:

The following diagram describes how the Company's Risk Management System is integrated into the Company's organisational structure and decision-making processes.

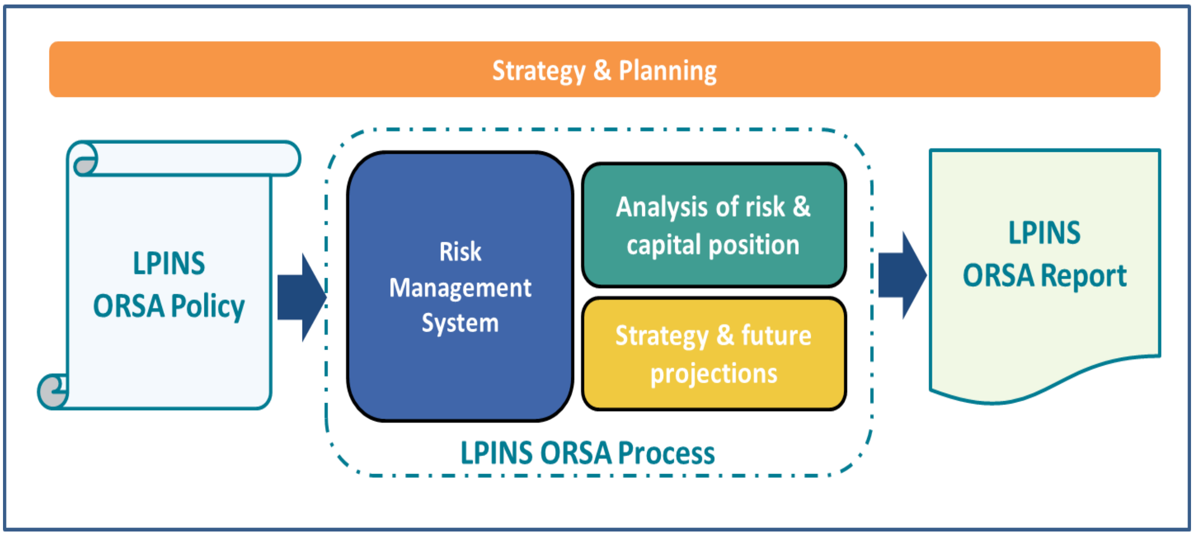


No gaps were identified in the Risk Management System during the reporting period.

b) Own Risk and Solvency Assessment

The Company's Risk Management System includes the conduct of an Own Risk and Solvency Assessment ("ORSA") at least annually and more often in the event of a material change in the Company's risk profile. During the reporting period the Company conducted one scheduled annual ORSA. In addition, an ad hoc ORSA was performed during the reporting period as part of the Company's preparations for the proposed merger of the business of ALD Re into the Company.

The Company uses its ORSA process to consider its risk exposures and capital requirements over the business planning timeframe. This acts as a key input into the Company's strategic decision making and business planning process. The Company's ORSA assesses risks inherent in its business and determines its corresponding capital needs whilst taking into consideration its risk profile, approved risk tolerance limits and business strategy. The Company's ORSA process comprises the following steps:

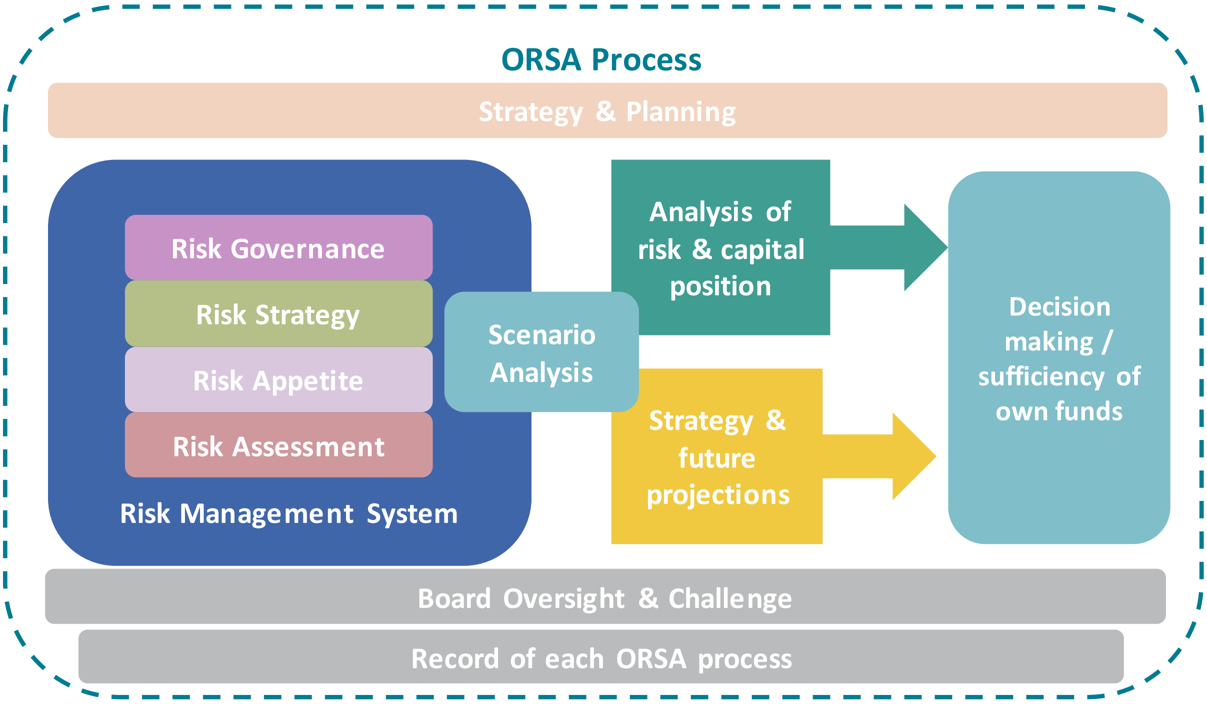


The Company's ORSA process is a circular process that relies on key elements of the business:

a) Board strategy, policies and plans;
b) The Solvency II Pillar I Balance Sheet standard model results, and base assumptions used;
c) The Risk Management System and its outputs, which identifies the key risks;
d) The Board Risk Committee which reviews, challenges and approves the test scenarios including the ORSA output;
e) The Actuarial Department which runs the tests on the Balance Sheet for capital adequacy and produce the resultant output;
f) The Risk Function, Actuarial Department and management which assess the outputs and prepare reports;
g) The Actuarial Function which provides its opinion on both the ORSA input stress tests and resultant outputs;
h) The Board Risk Committee and Board's assessment of the output and resultant capital, strategy and risk appetite review; and
i) ORSA reporting to the Central Bank of Ireland.

In its ORSA the Company uses, as a base, the Solvency II Standard Formula Model to calculate the required solvency capital but also considers a number of "non-quantifiable" risks when assessing its own solvency needs. The results are subjected to a range of scenario and stress tests that are reviewed by management and challenged by the Board and, where appropriate, potential management actions are noted and conclusions drawn.

The following diagram depicts the ORSA process in greater detail. It shows that stress and scenario tests are used in conjunction with the assessment of risk and capital to facilitate decisions about the adequacy of the Company's own funds.



ORSA assessments to date indicate that the Company is adequately capitalised.

4. Internal Control System

The Company's Internal Control System consists of five interrelated components, namely control environment, risk assessment, control activities, reporting, and monitoring. The Company's Internal Control System adopts the "Three lines of Defence" model as set out in the following diagram.

Three Lines of Defence Model		
1st Line of Defence	**2nd Line of Defence**	**3rd Line of Defence**
Business Operations: Business Management is responsible for the identification and assessment of risks and the implementation and enforcement of controls	**Oversight & Challenge:** Board Sub-committees and Control Functions provide key oversight of activities in business operations and challenge the completeness / accuracy of risk identification and assessment, and implementation of controls	**Independent Assurance:** Internal Audit provides independent and objective assurance on the robustness of the Risk Management System, and the appropriateness and effectiveness of internal controls
Key Components: • Managing Director • All employees • Management of outsourced service providers • Actuarial Department • Investment Committee • Underwriting Committee • Executive Management Committee	**Key Components:** • Board Risk Committee • Risk Function • Compliance Function • Actuarial Function • Insurance Risk Committee • Non-Insurance Risk Committee	**Key Components:** • Internal Audit Function • Audit Committee

The Company's Internal Control System and Internal Control Policy set out the role of each of the first line of defence functions in respect of business operations, the second line of defence functions in relation to oversight and challenge and the third line of defence in relation to independent assurance.

The Actuarial Function, as part of the second line of defence, operates independently of the first line departments which are responsible for determining the Company's technical provisions, underwriting process and reinsurance arrangements.

a) Compliance Function

The Company's Compliance Function, led by the Head of Compliance, operates in accordance with the Company's Compliance Policy. The Compliance Function forms part of the second line of defence within the Company's Internal Control System. The primary activities of the Compliance Function comprise:

a) Identification and assessment of compliance obligations;
b) Monitoring the impact of changes in the Company's compliance and regulatory environment;
c) Development and delivery of an annual compliance plan and report;
d) Training, awareness and education;
e) Provision of advice on compliance matters;
f) Incident management and reporting;
g) Liaising with the Central Bank of Ireland and other regulators; and
h) Reporting, including to the Board Risk Committee.

The activities of the Compliance Function are subject to periodic audit by Internal Audit.

5. Internal Audit Function

The Company outsources its Internal Audit Function to the Group Audit Department of LeasePlan Corporation N. V. in accordance with the Company's Outsourcing Policy. The Function operates in accordance with the Company's Internal Audit Policy and the LeasePlan Corporation Internal Audit Charter which have been approved by the Board. The policy is reviewed and updated on an annual basis and more frequently if required.

The Company's Internal Audit Function is independent from business units and forms part of the third line of defence in the Company's Internal Control System. The Company's outsourcing of its Internal Audit Function to its parent company assists in preserving the independence and objectivity of the function as the function comprises no staff of the Company. The Company and its Internal Audit Function subscribes to the Institute of Internal Auditors definition of internal audit which requires "independent, objective assurance". The Company's Internal Audit Policy sets out the measures taken by the Company and the Internal Audit Function to maintain ongoing independence including audit staff rotation.

The Internal Audit Function conducts an internal audit of the Company at least annually. Internal Audit findings and recommendations are reported to the management body who are required to respond to those findings and recommendations.

The Internal Audit Function reports to the Audit Committee of the Company. The Audit Committee considers audit plans, audit reports, resourcing and performance.

6. Actuarial Function

The Company outsources its Actuarial Function, including the Head of Actuarial Function, to an actuary and Central Bank approved Head of Actuarial Function within an external professional services firm in accordance with the Company's Outsourcing Policy. The Function operates in accordance with the Company's Actuarial Function Terms of Reference. The Company's Actuarial Function forms part of the second line of defence in the Company's Internal Control System.

The Company's Actuarial Function has the following key responsibilities:

Technical Provisions

- Coordination of calculation of technical provisions including the Actuarial Report on Technical Provisions ("ARTP");
- Review of appropriateness of methodologies and assumptions;
- Review of data sufficiency and quality; and
- Experience analysis.

Opinions

- Delivery of Actuarial Opinion on Technical Provisions ("AOTP") following analysis conducted for the ARTP;
- Delivery of Opinion on the Company's Underwriting Policy;
- Delivery of Opinion on the Company's Reinsurance arrangements; and
- Delivery of Opinion on the Company's ORSA.

Risk Management

- Contributing to the effective implementation of the Risk Management System and the Own Risk and Solvency Assessment ("ORSA") process.

7. Outsourcing

The Company operates an Outsourcing Policy which is approved by the Board Risk Committee and adopted by the Board. The Outsourcing Policy outlines the Company's policy with regard to the outsourcing of critical or important functions or activities ("Core Outsourcing") which are essential to the operation of the Company. The Company's Outsourcing Policy outlines the roles and responsibilities, procedures, approval requirements, monitoring and reporting requirements applicable to Core Outsourcing.

As the Company is part of the LeasePlan group, much of the Company's outsourcing is to other group entities. The Company's Core outsourced activities comprise:

Core Activity	Description	Jurisdiction of Service Provider
Claims Handling	Provision of claim handling activities on behalf of the Company (some claim handling activities may not constitute critical or material outsourcing and therefore some claim handlers may not be in scope).	Various EEA jurisdictions into which the Company writes insurance
Investment Management (Deposits)	Provision of treasury services to the Company.	Ireland
Data storage and systems support	Management of the platforms that host the Company's systems and data and provision of first line support to the Company.	Ireland and Netherlands
Internal Audit	Provision of internal audit services.	Netherlands
Actuarial Function	Actuarial Function including Head of Actuarial Function.	Ireland
System to support Solvency II Reporting	System to support Solvency II QRT Reporting to the Central Bank of Ireland.	Germany
Investment Management (Bonds)	Exercise of investment discretion within investment guidelines set by the Company.	Ireland
Fiscal representation and administration	Fiscal representation and administration activities in the countries in which the Company operates.	United Kingdom and the various EEA jurisdictions into which the Company writes insurance
Board pack hosting	Board pack hosting and related software-as-a-service.	United Kingdom (data hosted within the EEA)

8. Any other information

The Company believes that its system of governance as set out in the Company's Internal Control System, Risk Management System and Board Charter is adequate in the light of the nature, scale and complexity of the risks inherent in its business. The Company's business is monoline, namely motor and related insurances, and its business is predominately in connection with the fleet leasing and fleet management activities of its affiliate entities within the LeasePlan Group.

The Company believes that its Internal Control System incorporates appropriate challenge and oversight by persons with appropriate knowledge of the Company's business. The Company believes that its Risk Management System, including ORSA, provides a sufficiently forward-looking and robust assessment of risk in the context of the Company's predominately intra-group business model.

Finally, the Company believes that its corporate governance, including Board, sub-committees and management committees, provides appropriate internal review and challenge.

The Company has no other disclosures to make in respect of the Company's System of Governance.

C Risk Profile

The Company is subject to risks in the course of its business. These risks include underwriting risk, market risk, credit risk, liquidity risk and operational risk. Underwriting risk comprises mainly non-life underwriting risk. However, a certain amount of health and life underwriting risks arise incidentally from the non-life insurance contracts written by the Company.

The above risks comprise the Company's primary material risks. These risks are assessed within the Company using an entity-level assessment conducted by management, process-level assessments conducted by process owners and a strategic risk assessment conducted by the Board Risk Committee. The Company's Risk Function, led by the Head of Risk, operates in conjunction with the Risk Function of its parent, LeasePlan Corporation.

The Company has adopted the risk mitigation techniques of its parent company where considered appropriate. The Company operates a Risk Appetite Framework based on capital usage. This capital usage-based risk appetite follows a quantitative and qualitative approach to risk appetite and is integrated with the ORSA process and the Company's business strategy.

During the year there were no material changes to the Company's risk exposure for existing business and there were no material changes to the measures used to assess same. The Company does not use special purpose vehicles and does not have exposures arising from off-balance sheet positions.

The table below gives the breakdown of the various risk charges making up the Company's SCR as calculated by the Standard Formula as at 31 December 2023. Please note that diversification benefit explains the summation of the individual components exceeding the overall requirement.

€'000	LPINS Capital Requirements
Market risk	29,560
Counterparty default risk	16,640
Non-life underwriting risk	113,535
Health Underwriting Risk	41,508
Operational risk	8,675
Life underwriting risk	666
LACDT	(22,812)
SCR	**129,270**

In accordance with the Company's SCR Assurance Process, between year-ends, SCR and SCR coverage ratio are monitored at least on a quarterly basis, to ensure continuous SCR compliance.

1. Underwriting Risk

a) Risk Exposure

During the year, the Company's exposure to underwriting risk was across 20 jurisdictions. The Company's gross written premium during the reporting period was €284.9m across all jurisdictions. Legislation, regulations, market requirements and market practices vary across these markets. Likewise, underwriting requirements and risks vary across these markets.

While the Company's underwriting risk is diversified across multiple markets, its knowledge of individual markets is necessarily less than that of domestic insurers in those markets. The Company's Underwriting Risk Policy sets out the Company's processes for the management of Underwriting Risk. The Company uses a process-level risk and control self-assessment to assess, monitor and report upon Underwriting Risk. The Company uses key risk indicators and risk appetite statements to monitor its Underwriting Risk.

The Company's largest risk charge under the SCR is the non-life underwriting risk charge. This charge represents the risk associated with the writing of insurance business and settling of claims provisions. At 31 December 2023, the Company had a non-life underwriting risk charge of €113.5m.

The Company has a risk charge of €41.5m in respect of health underwriting risk owing to its personal accident policies. The bulk of this charge is related to Health CAT risk which does not fit very well with the Company's business model given that the Company's personal accident cover applies to the driver when they are in or next to their vehicle, meaning that risk concentrations are less likely. The Company also has a small risk charge of €0.1m in respect of life underwriting risk. This risk charge relates to the longevity risk associated with Periodical Payment Orders (PPOs). This year, we initiated an additional PPO in a European country, with its associated risk charge included in the annual life underwriting risk.

b) Risk Concentration

The Company writes various types of non-life insurance risks, including motor third-party liability and motor own damage, as well as ancillary covers and leasing related risks. The Company's business is predominately sourced from within the group.

The Company's business is well diversified geographically, both between countries and within countries. As a result, few underwriting risk concentrations exist. The Company's premium and reserve risk is well diversified across all European regions. The Company's largest concentration by geography is in the Netherlands in respect of the Company's TPL product. Thereafter, a moderate level of diversification exists between geographies and product lines. The main product sold by the Company is motor third-party liability insurance (LOB 4). This is reflected in the underwriting charge being driven largely by the capital requirement on LOB 4. Concentration of risk is also mitigated through reinsurance.

c) Risk Mitigation

The Company's Risk Management System and related policies set out the techniques used by the Company to manage and mitigate the risks to which it is exposed. The Company uses its program of risk assessments, risk appetite monitoring and risk governance comprising management risk committees and the Board Risk Committee to monitor the continued effectiveness of these risk mitigation techniques.

The risk mitigation techniques used by the Company to mitigate underwriting risk are set out in the Company's Underwriting Risk Policy. These include the operation of risk selection and pricing procedures, the operation of an Underwriting Committee, underwriting authorities, reinsurance, underwriting exposure limits, escalation procedures, and reporting, including to the Control Functions of the Company.

In addition, reinsurance is purchased to reduce and contain the volatility of results. The level of retention in different reinsurance contracts is aligned with the size and the risk profile of the underlying portfolios. This includes taking account of the cost of reinsurance on the one hand and the risk that is retained on the other. Risk that is retained is constrained through pre-defined limits as set by the Underwriting Committee.

The Company's underwriting risk appetite, underwriting risk metrics and underwriting key risk indicators are used by the Underwriting Committee, the Insurance Risk Committee and the Board Risk Committee to monitor the ongoing effectiveness of these risk mitigation techniques. The Underwriting Function undertakes an underwriting process level risk and control self-assessment. In addition, the Company's Business Controls Function (second line of defence) and Internal Audit Function (third line of defence) review and audit the effectiveness of the Company's underwriting processes.

d) Risk Sensitivity

A number of sensitivity analyses are used to assist the Company in understanding its exposure to the volatility of the Company's more material risks. These sensitivity analyses on the Company's key risk exposures help identify and quantify risks and help inform the Company's decision-making process.

The following sensitivity analysis is carried out in relation to underwriting risk:

- Expected loss ratios are a key assumption in the estimate of ultimate losses. As at 31 December 2023, sensitivity analysis shows that an increase of 2.5% in the loss ratios used in the calculation of the premium component of the technical provisions would result in a decrease in the SCR charge of €1,049k. In terms of SCR coverage ratio, this remains largely unchanged due to the reduction in Own Funds.

The above sensitivity analysis would have the following impact on the Company's solvency metrics:

Scenario	Own Funds (€000s)	Solvency Capital Requirement (SCR) (€000s)	Solvency Coverage Ratio
Base scenario	**336,289**	**129,270**	**260%**
Increase in loss ratios of 2.5%	334,961	128,221	261%

In addition, underwriting related stresses are included in a number of the Company's ORSA scenarios. This process helps the Company stress its Underwriting Risk exposure over the business planning period including in combination with other stressed risk exposures.

2. Market Risk

a) Risk Exposure

The Company's exposure to market risk is predominately in relation to its investments. The Company's investments at the reporting date totalled €672m. The Company's investments are predominately bank deposits. As at 31 December 2023, the Company held €586.9m in deposits. Deposits with a term of 8 days or more are subject to interest rate risk. The Company holds minor quantities of non-euro currencies for matching purposes. These are subject to foreign exchange risk.

As at 31 December 2023, the Company held €84.7m in both sovereign and corporate bonds with durations of between 1 and 5 years. As all bonds held by the Company are denominated in Euro, they are not subject to foreign exchange risk.

The Company's Investment Risk Policy sets out the Company's processes for the management of market risk. Investment risk forms part of the Company's Finance Function process-level risk and control self-assessment through which the risk is assessed, monitored and reported. During the reporting period interest rates continued to increase and this had a positive impact on the investment return for the financial period.

As at 31 December 2023, the Company had a market risk charge under the SCR of €29.5m. The Company's market risk charge is based on the Company's investments in term deposits i.e., deposits with terms of 8 days or more and its bond holdings. The market risk charge captures foreign exchange, spread and interest rate risk, along with the Company's concentration risk exposure to certain credit institutions. In accordance with IFRS 16, it also includes a property charge in relation to the lease asset included on the balance sheet.

b) Risk Concentration

The aim of the Company's Asset Liability Management Policy is to select assets that are matched to total liabilities (as far as possible) by currency, duration and by suitable type (predominately deposits). The Company is therefore exposed to concentration risk by product (deposit) and by currency (and therefore geographical area).

Risk concentrations exist in that the bulk of the Company's asset holdings are with a small number of highly rated banks and LeasePlan Corporation. The Company monitors these risk concentrations on an ongoing basis. This is reflected in the Company's Market and Counterparty Risk SCR charges (dependent on the duration of the bank deposit). No other material risk concentrations exist within market risk as the Company has exposure to many currencies and rebalances its exposures monthly.

c) Risk Mitigation

The Company's Risk Management System and related policies set out the techniques used by the Company to manage and mitigate the risks to which it is exposed. The Company uses its programme of risk assessments, risk appetite monitoring and risk governance via management risk committees and the Board Risk Committee to monitor the continued effectiveness of these risk mitigation techniques.

Market Risk is the risk of loss resulting directly or indirectly from fluctuations in the level of the market price of assets, liabilities and financial instruments. The risk mitigation techniques used by the Company to mitigate Market Risk are set out in the Company's Investment Risk Policy. These include the following:

- Adopting a conservative approach to investments;
- Holding investments of sufficient amount, duration and liquidity to ensure all liabilities are met as they fall due; and
- Ensuring that there are appropriate policies, strategies and procedures in place to meet these objectives.

The Company's assets are invested in accordance with the prudent person principle. The Company has placed the funds that support the claims reserves with external institutions with an S&P rating of investment grade or higher. In addition, the Company applies the prudent person principle in deciding the appropriate level of deposits and bonds to place with LeasePlan group.

The continued effectiveness of the Company's risk mitigation techniques for Market Risk is monitored by the Company's Investment Committee in accordance with the Company's Investment Risk Policy and the Investment Committee Terms of Reference. In addition, the Company's investment risk metrics are used by the Non-Insurance Risk Committee and the Board Risk Committee to monitor the ongoing effectiveness of these risk mitigation techniques.

d) Risk Sensitivity

A number of sensitivity analyses are used to assist the Company in understanding its exposure to the volatility of the Company's more material risks. These sensitivity analyses on the Company's key risk exposures help identify and quantify risks and help inform the Company's decision-making process.

The following sensitivity analysis was carried out in relation to Market Risk:

- As at 31 December 2023, sensitivity analysis shows that an increase in interest rates using EIOPA shock up yield curves would result in a decrease in the SCR of €1.9m, and a decrease in interest rates using EIOPA shock down yield curves would result in an increase in the SCR of €220k.

The above sensitivity analysis would have the following impact on the Company's Solvency metrics:

Scenario	Own Funds (€000s)	Solvency Capital Requirement (SCR) (€000s)	Solvency Coverage Ratio
Base scenario	**336,289**	**129,270**	**260%**
Interest rates shock up	352,887	127,324	277%
Interest rates shock down	327,915	129,050	254%

3. Credit Risk

a) Risk Exposure

Credit Risk is the risk that the Company is exposed to lower returns or loss if another party fails to perform its financial obligations to the Company. The Company is subject to credit risk, the majority of which is in relation to group entities as policyholders, mediators or claim handlers.

The Company is exposed to Credit Risk in the following key areas:

- Amounts due from institutions in respect of deposits placed;
- Reinsurers' share of insurance liabilities;
- Amounts due from reinsurers in respect of claims already paid;
- Amounts due from policyholders;
- Funds held by claim handlers;
- Cash at bank; and
- The Company's bond portfolio.

The Company's main non-group Credit Risk is in relation to reinsurers, the banks in which it places deposits and its portfolio of sovereign and corporate bonds. As all sovereign bonds held are issued by EEA countries, they are not subject to a credit risk charge. The Company's deposits and corporate bonds are with counterparties with a Standard & Poor's (S&P) rating of investment grade or higher. There were no material changes to the Company's credit risk exposure during the reporting period.

As at 31 December 2023, the Company had a Counterparty Default risk charge under the SCR of €16.6m. The Company's Counterparty Default risk charge relates to the risk that counterparties do not meet their obligations as they fall due. This includes exposure to banks, reinsurers, policyholders, claim handlers and intermediaries. It excludes any exposures to counterparties already considered under market risk i.e. bond holdings and longer-term bank exposures.

b) Risk Concentration

The Company is subject to Credit Risk concentration in that a substantial proportion of premiums due from policyholders are due from group policyholders.

A risk concentration also exists in that the bulk of the Company's asset holdings are with a small number of highly rated banks and LeasePlan Corporation. The Company operates counterparty risk limits which restrict exposure to any one bank. The Company monitors these risk concentrations on an ongoing basis. This is reflected in the Company's Market and Counterparty Risk SCR charges (dependent on the duration of the bank deposit).

In order to mitigate concentration risk with reinsurers, the Company operates limits which restrict the maximum share held by reinsurer and by credit rating. On a quarterly basis, a report is prepared and distributed to the Non-Insurance Risk Committee and Board Risk Committee outlining the current credit rating of reinsurers, along with other monitored factors such as share of reinsurance exposure, outlook and ownership structure.

No other material risk concentrations exist in relation to credit risk.

c) Risk Mitigation

The risk mitigation techniques used by the Company to mitigate Credit Risk are set out mainly in the Company's Reinsurance and Investment Risk policies. The Company manages its Credit Risk exposure by monitoring and managing the levels of exposure to each counterparty and by monitoring the Standard & Poor's and/or Moody's rating of all assets to ensure the Company's investments are in secure assets of a high quality.

The continued effectiveness of the Company's risk mitigation techniques for Credit Risk is monitored by the Company's risk committees. In addition, the Company's credit risk metrics are used by the Non-Insurance Risk Committee and the Board Risk Committee to monitor the ongoing effectiveness of the above risk mitigation techniques.

d) Risk Sensitivity

A number of sensitivity analyses are used to assist the Company in understanding its exposure to the volatility of the Company's more material risks. These sensitivity analyses on the Company's key risk exposures help identify and quantify risks and help inform the Company's decision-making process.

The following is the sensitivity analysis carried out in relation to credit risk:

- As at 31 December 2023, sensitivity analyses show that a downgrade of one credit quality step (as stipulated in Solvency II calibration) of the bank with whom the Company holds the majority of cash balances would result in an increase in the SCR of €2.4m.

The above sensitivity analysis would have the following impact on the Company's Solvency metrics:

Scenario	Own Funds (€000s)	Solvency Capital Requirement (SCR) (€000s)	Solvency Coverage Ratio
Base scenario	**336,289**	**129,270**	**260%**
Downgrade of 1 credit quality step of largest bank	336,289	131,681	255%

In addition, Credit Risk related stresses are included in a number of the Company's ORSA scenarios. This process helps the Company stress its Credit Risk exposure over the business planning period including in combination with other stressed risk exposures.

4. Liquidity Risk

a) Risk Exposure

As the Company's investments are predominately held in short-term bank deposits, it is subject to limited Liquidity Risk. The Company's Liquidity Risk Policy and Asset Liability Management Policy set out the Company's processes for the management of Liquidity Risk. Liquidity Risk forms part of the Company's Finance Function's process-level risk and control self-assessment through which, together with the related risk appetite statement, the risk is assessed, monitored and reported. There were no material changes to the Company's liquidity risk exposure during the reporting period.

The Company has invested a portion of its total investments in bonds with remaining durations of up to five years.

b) Risk Concentration

Risk concentrations in relation to liquidity risk can arise in a number of ways:

- **Risk concentration in product type:** Whilst the Company has in recent years increased its investment in its portfolio of corporate and sovereign bonds, during the reported period the Company's investments remain primarily in deposits. Therefore, the Company does have a concentration in terms of product type. This concentration does not impact the Company's ability to generate cash in times of stress, as the asset classes employed are highly liquid.

- **Risk concentration in maturity:** As the Company short-matches assets to cover some longer tail technical reserve payments, there exists a certain level of concentration in shorter maturity assets. However, this is considered to be a prudent policy with respect to liquidity. In addition, the Company has minimum acceptable credit ratings (investment grade or higher) and concentration risk limits in place which set the maximum allowable exposure by credit institution.

- **Risk concentration in provider:** This can arise as a result of dependency on a few providers of liquidity stemming from concentrated counterparty default risk. The Company has counterparty risk limits in place which restrict the concentration risk with any one counterparty.

The Director of Finance, in conjunction with the Investment Committee, ensures the following:

- That the concentration limits to asset classes and individual counterparties are subject to review on a monthly basis and any increases are proposed to the Board for approval;
- That active monitoring and management of concentration risk is undertaken, including an analysis of possible contagion; and
- That asset concentration trends are analysed to identify adverse impacts on the Company and that appropriate remedial action is taken.

The monitoring of liquidity concentration risk limits is outlined in further detail in the following section (Risk Mitigation).

c) Risk Mitigation

The Company's Risk Management System and related policies set out the techniques used by the Company to manage and mitigate the risks to which it is exposed. The Company uses its programme of risk assessments, risk appetite monitoring and risk governance via management risk committees and the Board Risk Committee to monitor the continued effectiveness of these risk mitigation techniques.

Liquidity Risk is the risk that the Company is unable to realise investments and other assets in order to settle its financial obligations when they fall due. The purpose of liquidity risk management, as part of an overall investment risk strategy, is to ensure there are appropriate practices to provide sufficient liquidity over the short, medium and long term.

The risk mitigation techniques used by the Company to mitigate Liquidity Risk are set out in the Company's Liquidity Risk Policy. These include the following:

- The Finance Function reviews the Company's cash balance daily to monitor liquidity positions. This includes determining the level of mismatch between the cash inflows and the cash outflows from balance sheet positions and expected cash flows from insurance and reinsurance to determine the total liquidity needed in the short term, including an appropriate buffer for any potential liquidity shortfall.

- In addition, the Finance Function performs daily monitoring of the Company's bank accounts. The Company prepares for any unusual cash flow movements by holding funds to cover payments for 3 months (excluding receipt of premium) in call accounts (overnight) and short-term deposits that mature in less than 90 days.

- The Company short matches assets to cover some longer tail technical reserve payment requirements.

As at 31 December 2023, the Company included €54.5m (€43.4m at YE 2022) in Solvency II Own Funds relating to Expected Profits in Future Premiums ("EPIFP"). This has been calculated in accordance with Article 260(2) of Solvency II. As this asset relates to profits embedded in 2024 + contracts, the emergence of these profits is expected to occur during 2024 (and possibly later years). Given the nature of this asset, it is not a liquid asset that can, for instance, be used to pay claims. This is not a concern for the Company given the very liquid nature of the Company's portfolio of "investible" assets where the bulk of these assets are held in highly liquid bank deposits.

The continued effectiveness of the Company's risk mitigation techniques for Liquidity Risk is monitored by the Company's Investment Committee, in accordance with the Company's Investment Risk Policy and Investment Committee Terms of Reference. In addition, the Company's investment risk appetite is used by the Non-Insurance Risk Committee and the Board Risk Committee to monitor the ongoing effectiveness of these risk mitigation techniques.

d) Risk Sensitivity

As discussed above, the Company is exposed to minimal Liquidity Risk due to the nature of its investments. The Company also short matches assets to cover some longer tail technical reserve payments, which is a prudent policy with respect to liquidity. Liquidity Risk forms part of the Finance

Function’s process-level risk and control self-assessment through which, together with the related risk metrics, the risk is assessed, monitored and reported. Liquidity risk is not an influential driver of the Company’s Solvency Coverage Ratio and as such, the Company does not carry out sensitivity analyses on this risk.

5. Operational Risk

a) Risk Exposure

The Company is exposed to Operational Risk arising from internal operations and from operations which it has outsourced. The Company's Operational Risk Policy sets out the Company's processes for the management of Operational Risk. The Company uses risk appetite statements, risk metrics and key risk indicators and a programme of operational risk monitoring and business continuity management to assess and monitor Operational Risk.

The Company, through its entity level risk assessment and, in particular, through its various process-level risk and control self-assessments, assesses, monitors and reports upon Operational Risk. The Company monitors performance against key risk indicators for Operational Risk in its Non-Insurance Risk Committee. There were no material changes to the Company's Operational Risk exposure during the reporting period.

As at 31 December 2023, the Company had an Operational Risk charge under the SCR of €8.7m. This relates to the risk associated with the people, processes and systems involved in the running of the Company.

b) Risk Concentration

The Company does not have a risk concentration relating to Operational Risk. The potential for concentration risk is continuously managed and monitored using the risk management techniques outlined in the section below (Risk Mitigation).

c) Risk Mitigation

The Company's Risk Management System and related policies set out the techniques used by the Company to manage and mitigate the risks to which it is exposed. The Company uses its programme of risk assessments, risk appetite monitoring, key risk indicators and risk governance via risk committees and the Board Risk Committee to monitor the continued effectiveness of these risk mitigation techniques.

Operational Risk is the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events, which can disrupt the flow of business operations. Operational losses can be directly or indirectly financial. The risk mitigation techniques used by the Company to mitigate Operational Risk are set out in the Company's Operational Risk Policy. These include risk identification, the conduct of entity level and process level risk assessments, the implementation of appropriate risk responses following assessment, risk monitoring, operational risk appetite statement setting and reporting.

The Company operates an operational risk incident monitoring process and categorises incidents into the following categories:

- Internal Fraud;
- External Fraud;
- Employment Practices and Workplace Safety;
- Clients, Products & Business Practices;
- Damage to Physical Assets; and
- Execution, Delivery & Process Management.

In addition, the Company's Business Continuity Management and Information Security functions seek to mitigate Operational Risk in their respective areas.

The continued effectiveness of the Company's risk mitigation techniques for Operational Risk is monitored by the Company's risk committees. In addition, the Company's operational risk appetite is used by the Non-Insurance Risk Committee and the Board Risk Committee to monitor the ongoing effectiveness of the above risk mitigation techniques.

d) Risk Sensitivity

While Operational Risk requires ongoing vigilance, it is not, by itself, a substantial risk for the Company. Accordingly, while no specific risk sensitivity is provided here for same, during the Company's ORSA process, a qualitative assessment of material operational risks is carried out, as well as a quantitative assessment of the impact of a large operational loss on the Company. The impact of this operational loss scenario within the Company's ORSA process was to reduce the Own Funds as a result of a decrease in profit. This, in itself, did not have a material impact on the Company's Solvency Coverage Ratio. This process helps the Company stress its Operational Risk exposure over the business planning period including in combination with other stressed risk exposures.

6. Any other material risks

As part of the Company’s regular ORSA process, the overall risk profile and the associated capital needs are assessed against the Company’s actual solvency capital position. The most important risks to which the Company is exposed, including risks that are not incorporated into the standard formula, are identified through a combined top-down and bottom-up risk assessment process. The following risks, outside the scope of the standard formula, are recognised by the Company as requiring ongoing vigilance:

- Cyber Risk;
- Sustainability and climate change;
- Group Risk;
- Strategic Risk; and
- Reputational Risk.

a) Cyber Risk

With the increased dependency on digital systems and digital data storage within the insurance industry and within the Company, there is an increased cyber security risk of malicious data theft and service disruption. For this reason, the Company operates, in addition to first line IT, an Information Security Function within the second line of defence. The Company’s Information Security Function monitors a suite of information security domains. These domains cover the core elements of cybersecurity, including:

a) Application security;
b) Information and data security;
c) Network security;
d) Business continuity planning; and
e) Ongoing end-user education.

Performance in relation to each information security domain, including the required periodic activities per domain, is monitored by management, the Non-Insurance Risk Committee and the Board Risk Committee.

The Company continues its preparations to meet the requirements of the Digital Operational Resilience Act by the date of application of the Act in 2025.

b) Sustainability and Climate Change

As a group company, the Company adopts and aligns to the group sustainability strategy. The Company is committed to protecting the planet by reducing its environmental impact and helping tackle climate change. As the group insurer, the Company’ strategy is to insure the group’s growing fleet of electric vehicles and help the group lead the transition to zero emissions mobility.

The Company's underwriting and pricing processes continue to respond to the evolving risk profile of electric vehicles in the Company's markets. The Company continues to integrate climate-related and environmental risks into its governance and risk management processes. The Company is committed to contributing to societal wellbeing by helping create a more equal and inclusive society and is committed to being responsible by winning and retaining the trust of its stakeholders and by conducting business according to high ethical standards.

The Company's Climate Change Materiality Assessment process assesses both the effect that climate change has on the Company's activities and the impact that the Company's activities, including investments, have on the climate. Due to the nature of the risks insured by the Company, namely risks associated with moveable assets in the form of vehicles located across multiple jurisdictions, the Company's direct exposure to climate and environmental risks is somewhat limited. However, as the Company underwrites Natural Catastrophe insurance (e.g. flood and hail), increased frequency and/or severity of claims under this cover is considered to be the Company's main climate change-related underwriting exposure.

The Company maintains reinsurance in respect of its Natural Catastrophe risk. The Company has undertaken Natural Catastrophe modelling with the support of a market-leading climate modelling provider. This modelling helped, and continues to help, the Company identify appropriate Natural Catastrophe reinsurance structures and appropriate levels of retained risk. In relation to investments, due to the nature of the Company's predominately bank deposit investment portfolio, the Company has limited climate and environmental transition risk on its investments and its investments do not have a material adverse impact on the climate.

The Company monitors and assesses the impact of climate change on its business and its impact on the climate in its risk assessment and ORSA processes.

c) Group Risk

The Company is heavily dependent on the wider group for its route to market, policyholders, mediators, claim handlers, intra-group deposits and support services. Group risk is assessed in the Company's corporate risk register and managed through a number of controls. The Company's ORSA includes stress scenarios in relation to group risk. The Company operates processes to manage, monitor and report its intra-group transactions in accordance with Central Bank of Ireland rules.

d) Strategic Risk

Strategic risk is the risk to the Company's earnings/capital due to adverse business decisions, improper implementation of decisions or lack of responsiveness to changes in the business environment.

Strategic risk is assessed in the Company's corporate risk register and is managed through a number of controls. The Company's ORSA stress testing process includes a strategic risk component through the inclusion of loss ratio reverse stress tests.

e) Reputational Risk

Reputational risk is the risk to the Company's earnings/capital due to an adverse perception of the image of the Company on the part of clients, counterparties, shareholders, investors and regulators.

Reputational risk is assessed in the Company's corporate risk register. The Company operates a risk metric for reputational risk which is monitored through the Company's Risk Appetite monitoring process.

The Company also has specific controls in place to limit reputational risk exposure such as the Company's Code of Conduct and related staff training, the Company's culture and conduct risk indicators and contractual agreements with outsourced service providers which set out expectations in relation to ethical behaviour and integrity.

D Valuation for Solvency Purposes

1. Assets

This section contains information regarding the valuation of the balance sheet items. For each material asset class, the bases, methods and main assumptions used for Solvency II purposes are outlined.

The following table analyses the Company's financial assets at 31 December 2023:

	Assets as at 31 December 2023	
	Solvency II Value €'000	Statutory Accounts Value €'000
Deferred acquisition costs		0
Property, plant & equipment held for own use	1,866	1,933
Bonds	84,102	85,503
Deposits other than cash equivalents	443,237	137,902
Reinsurance recoverables from:	27,280	41,098
Non-life excluding health	*18,012*	*32,186*
Health similar to non-life	*22*	*2*
Life excluding health and index-linked and unit-linked	*9,246*	*8,910*
Insurance and intermediaries receivables	44,821	25,720
Reinsurance receivables	0	0
Receivables (trade, not insurance)	487	487
Cash and cash equivalents	146,118	451,453
Total assets	**747,910**	**744,096**

Valuation of most financial assets is based on amortised cost for statutory purposes. In the paragraphs below, the valuation methodologies are described:

<u>Property, plant & equipment held for own use</u>

Property, plant & equipment are valued at net book value for statutory purposes. Property, plant, and equipment include €1.87m of right-of-use assets relating to leased assets For Solvency II valuation purposes, computer software tailored to the needs of the undertaking, that cannot be sold to another user, shall be valued at nil.

<u>Bonds</u>

The Company holds a mixture of corporate and sovereign bonds. The bonds are valued based on fair value under Solvency II and on an amortised cost basis under IFRS, with an IFRS 9 adjustment for

Expected Credit Loss. These differing treatments account for the difference in valuation between Solvency II and Statutory accounts value.

Deposits other than cash equivalents

Deposits other than cash equivalents are valued at fair value by the relevant financial institution, and the Company receives monthly statements at the period end to confirm the balances held. The categorisation of deposits and cash and cash equivalents is different between IFRS and Solvency II.

The difference between the Solvency II valuation and IFRS valuation of deposits other than cash equivalents, is the IFRS 9 adjustment for Expected Credit Loss. While accrued interest is excluded under IFRS, it is included under Solvency II.

Reinsurance asset

The reinsurance asset relates to the amounts that can be collected from reinsurers. The value of the asset is estimated using a method that is in line with the reinsurance contract for IFRS purposes. This balance is adjusted for the IFRS 9 Expected Credit Loss and discounting. For Solvency II purposes an adjustment is included for the possible default of the reinsurer and discounting.

The Company has claims that have been settled via court awarded Periodic Payment Orders ("PPOs") that provide regular payments to claimants until death. As such, these obligations have been valued using life actuarial techniques and the related reinsurance recoveries have been re-classified as a Life Reinsurance Asset.

Insurance and intermediaries' receivables

Insurance and intermediaries' receivable balances represent premiums due from policyholders. The Company has existing contracts at the valuation date (31 December) with associated premiums which are not due to be paid until after the valuation date. The future premiums are treated as debtors for IFRS reporting. A creditor is set up for the associated future commission payments. However, for Solvency II purposes, the premiums and commission are a future cashflow associated with an existing contract and, as such, they form part of the technical provisions. At 31 December 2023, the amount of future premium is approximately €40.2m. This is included as a reduction in technical provisions.

Cash and cash equivalents

Cash and cash equivalents are held at cost by the relevant financial institution, which approximates fair value, and the Company receives monthly statements at the period end to confirm the balances held. The categorisation of deposits and cash and cash equivalents is different between IFRS and Solvency II.

The difference between the Solvency II valuation and IFRS valuation of cash and cash equivalents is the IFRS 9 adjustment for Expected Credit Loss.

2. Technical Provisions

a) Technical Provisions Basis, Methods and Assumptions

The following section outlines the approach, general methodology and components of the Company's Technical Provisions. The two main components of the Technical Provisions are the best estimate provision and the risk margin. There are several distinct provisions that feed into the overall best estimate provision.

Provision for Claims Outstanding: The provision for claims outstanding covers cashflows related to all claim events which occur before or at the valuation date. The cashflows projected comprise of:

- Outstanding claims / Case reserves;
- Incurred but not reported claims;
- Incurred but not enough reported claims; and
- Premiums earned but yet to be received and commission earned but yet to be paid.

The Company makes use of the below standard techniques in order to arrive at an estimation of the ultimate level of claims:

Development Factor Method ("DFM")

- For this method, the Company assumes that for a particular accident period, the proportion of the ultimate claims, which has developed by each period, follows past trends.
- A set of assumed development factors is derived. The development factors are typically calculated as a weighted average of past accident periods. More recent accident periods generally receive a higher weighting.
- Projections are carried out on past claims data using the development factors that have been determined.
- The DFM is applied to both paid and incurred claims to produce both paid and incurred ultimate claims estimates.

Loss Ratio Method

- For this method, a projected loss ratio for a particular accident period is estimated by reference to an older, more developed period.
- By applying the projected loss ratio to a known earned premium, ultimate claims are estimated for the relevant accident period.

Burning Cost Method

- For this method, ultimate claims are arrived at by considering the ultimate cost of claims per unit of exposure.
- The ultimate burning cost for past periods is assessed in order to arrive at an estimate of ultimate claims for more recent accident periods.
- The past estimates used may or may not be adjusted for seasonal and / or inflationary effects.

- This method can be useful for more recent accident periods, avoiding an over reliance on underdeveloped notified claims data.

The company considers the appropriateness of the above methodologies separately by Solvency II line of business and by accident year. The selection of the most appropriate method is based on expert judgement which considers among other factors, the quantity, quality and reliability of the available data, and analyses all important characteristics of the business.

Claims Handling: The Company holds a provision for future claims handling expenses associated with the future processing of claims for accident periods up to the valuation date. The Company's Actuarial Department assesses an appropriate provision to cover the cost of settling current and future claims arising from insurance business written to the end of the relevant accounting period. It should be noted that for a proportion of the Company's risks, claims are managed by other parties and charged on a "per event" or equivalent basis.

Premium Provision: To calculate the premium provision a forward-looking combined ratio estimate is applied to the Company's unexpired premium. The ratio applied includes estimates of claims handling costs and administration expenses. The claims ratio is based on realistic expectations of future claims and considers future expected premium rates. The premium provision is net of premiums which are yet to be received for unexpired risk. Premium provision calculations are completed by the actuarial department in conjunction with the finance department. The estimation covers all programmes and all claim types.

Events Not In Data ("ENIDs"): The approaches used by the Company to arrive at a best estimate of ultimate claims allow for the historic level of uncertainty in the past claims data. In order to allow for the uncertainty regarding events that the Company believes are not yet present in past data, the Company makes an explicit allowance for ENIDs. These are events which could occur but are not yet apparent in the Company's historic claims data. Examples include provisions to allow for higher-than-expected future inflation, risks associated with insuring a greater number of Electric Vehicles and provisions to guard against catastrophic events resulting from climate change.

Reinsurance: The Company has (non-proportional) reinsurance in place to protect against large individual motor third-party liability claims. The Company also has reinsurance in place to protect against accumulations of risk related to motor property damage claims, e.g. from catastrophic weather events.

To calculate net technical provisions, the Company's reinsurers' share of claims is subtracted from claims provisions.

The Company's reinsurance cover is placed with a variety of third party reinsurers with strong credit ratings. The Company currently has no balances in dispute with respect to third party reinsurance recoveries.

Discounting: As per the Solvency II requirements, the Company discounts the run-off of the premium provision and the provision for claims outstanding in order to arrive at the Solvency II technical provisions. The pattern for the run-off of the premium provision and the provision for claims outstanding is arrived at using historic payment development trends. The discounting of the cashflows associated with the premium provision and provision for claims outstanding is performed using discount rates that are no higher than the relevant risk-free interest rates that are published by the European Insurance and Occupational Pensions Authority ("EIOPA").

Risk Margin: The approach taken by the Company for the Risk Margin calculation is Simplification 2, which is essentially the most detailed approach that can be used by a "Standard Formula" insurer. In this, the Non-Life and Health Underwriting risk charges are explicitly recalculated based on the projected run-off of the Technical Provisions ("TPs"). The Life Underwriting risk is run-off in relation to the expected run-off of the underlying claims. All the risk charges for all risk at future points in time are estimated based on the run-off of the total technical provisions. The Company uses EIOPA's prescribed cost of capital of 6% and applies this to the future SCR estimates. Discounting is performed for each future time period using EIOPA's prescribed yields. These calculations then arrive at the Company's risk margin.

This approach was chosen in light of the need for separate cashflow modelling, given the co-existence of both short-term and long-term liabilities.

Summary of Technical Provisions Results: The Company's overall gross and net technical provisions are illustrated in the exhibit below:

GROSS	**LPINS Technical Provisions at 31 Dec 2023 (€'000)**			
Line of Business	**Provision for Claims Outstanding**	**Premium Provision**	**Risk Margin**	**Total**
Income protection insurance	11,722	(4,284)	810	8,248
Motor vehicle liability	236,908	(17,590)	16,376	235,694
Other motor	57,509	(3,896)	3,975	57,588
Fire & other damage to property insurance	54	(246)	4	(188)
Legal expenses	1,216	(922)	84	378
Assistance	734	(1,696)	51	(911)
Miscellaneous financial loss	3,318	(7,525)	229	(3,978)
Annuities from non-life contracts	10,536	0	2,576	13,112
Proportional non-life reinsurance - other motor insurance	993	(24)	69	1,038
Total	**322,990**	**(36,183)**	**24,174**	**310,981**

NET	LPINS Technical Provisions at 31 Dec 2023 (€'000)			
Line of Business	**Provision for Claims Outstanding**	**Premium Provision**	**Risk Margin**	**Total**
Income protection insurance	11,722	(4,306)	810	8,226
Motor vehicle liability	224,407	(12,504)	16,376	228,279
Other motor	44,704	(2,568)	3,975	46,111
Fire & other damage to property insurance	54	(246)	4	(188)
Legal expenses	1,216	(922)	84	378
Assistance	734	(820)	51	(35)
Miscellaneous financial loss	3,322	(7,525)	229	(3,974)
Annuities from non-life contracts	1,290	0	2,576	3,866
Proportional non-life reinsurance - other motor insurance	993	(24)	69	1,038
Total	**288,442**	**(28,915)**	**24,174**	**283,701**

The below table compares the gross and net technical provisions as at 31 December 2023 to the position as at 31 December 2022:

	LPINS Technical Provisions (€'000)		
	As at 31 Dec 2023	**As at 31 Dec 2022**	**Difference**
Gross Technical Provisions	310,981	261,583	49,398
Net Technical Provisions	283,701	242,737	40,964

There is an increase of €49.4m in the gross Technical Provisions and an increase of approximately €41m in the net Technical Provisions between 31 December 2022 and 31 December 2023.
A major driver, common to both the change in net and gross Technical Provisions, is an increase in the volume of TPL business. Also, a significant contributor to the gross Technical Provisions change is additional life Technical Provisions due to an increase in PPO liabilities.

b) Level of Uncertainty associated with the amount of Technical Provisions

The Company's best estimate calculations seek to represent close to the 50th percentile of estimates for the Company's claims liabilities. The best estimate arrived at is the probability weighted estimate of future claims and expenses. As the best estimate is itself an estimate, there is a level of uncertainty associated with this amount.

In terms of quantifiable elements of uncertainty, the main elements include discount rates, loss ratio assumptions for exposure beyond the valuation date and lapse rates.

The table below shows the results of the stress tests carried out on the technical provisions:

Scenario	Net TPs excluding Risk Margin (€'000)	Relative Change from Base Scenario
Base scenario	259,527	
EIOPA Shock Up Interest Rates	247,090	-4.8%
EIOPA Shock Down Interest Rates	271,885	4.8%
Increase in FX rates of 10%	261,681	0.8%
Increase in loss ratios of 2.5%	263,283	1.4%
Increase in loss ratios of 10%	283,177	9.1%
Increase of Lapse Rates absolute by 1%	260,117	0.2%
Increase of Lapse Rates absolute by 5%	262,774	1.3%

The stress tests are performed on the technical provisions excluding the risk margin.

- **Interest Rate Risk**

Applying the EIOPA shock up yield curve reduces the technical provisions by 4.8% and applying the EIOPA shock down yield curve increases the technical provisions by 4.8%. Being a non-life insurer with relatively short-term liabilities (e.g. in comparison to a life insurer) and a short asset-side duration, the Company has a low exposure to reductions in interest rates.

- **Currency FX Rate Sensitivity**

A strengthening of foreign currency rates against the Euro resulted in an increase in the technical provisions of 0.8%. As it is the Company's Investment Policy to broadly match assets with liabilities in terms of currency, the Company does not have material exposures to changes in currency rates.

- **Loss Ratio Sensitivity**

An increase in the loss ratio assumptions of 2.5% results in a 1.4% increase in the technical provisions. If the loss ratios of individual programmes are increased by 10%, this results in an 9.1% increase in technical provisions.

- **Lapse Rate Sensitivity**

Two lapse rate scenarios were considered. An increase in the lapse rate assumption of 1% results in a 0.2% increase in the technical provisions, while an increase of 5% would increase technical provisions by 1.3%.

Additional sources from which uncertainty could potentially arise are as follows:

Events Not In Data ("ENIDs"): The approaches used by the Company to arrive at a best estimate of ultimate claims allow for the historic level of uncertainty in the past claims data. In order to allow for the uncertainty regarding events that the Company knows are not yet present in past data, the Company has a specific provision for ENIDs.

Premium Provision: The premium provision is subject to additional uncertainty over and above that contained within the claims provision in that it contains cost estimates for events that have not yet occurred. Particularly at year-end, it must also contain an allowance for business bound in the main renewal season for the following year that is not yet recorded on the system, as well as premium contracted and on the system, but not yet received. These involve additional assumptions which increase the level of uncertainty, though this is mitigated to a certain extent by reasonableness checks (such as checking as year on year movements).

c) Solvency II Best Estimate versus Financial Statement Reserves

The Company's Solvency II best estimate uses as a starting point the undiscounted, best estimate provisions that are included in the financial statements. Thereafter, a number of adjustments are applied to comply with Solvency II requirements (e.g. discounting is applied together with an ENID provision being held).

For financial statements, the Company holds an explicit risk adjustment to adhere to IFRS requirements.

The Company's movement from IFRS reserves to Solvency II technical provisions is set out in the table below:

Total Technical Provisions - IFRS to Solvency II Movements (€'000)			
	Gross	**Ceded**	**Net**
IFRS Reserves	319,969	41,098	278,871
Total Solvency II Technical Provisions	310,981	27,280	283,701

d) Application of the Matching Adjustment

This guideline is not applicable to the Company as the Company does not use the matching adjustment.

e) Application of the Volatility Adjustment

This guideline is not applicable to the Company as the Company does not use the volatility adjustment.

f) Application of the Transitional Risk-Free Interest Rate-Term Structure

This guideline is not applicable to the Company as the Company does not use the transitional risk-free interest rate-term structure.

g) Application of the Transitional Deduction

This guideline is not applicable to the Company as the Company does not use the transitional deduction.

h) Recoverables from Reinsurance Contracts

The Company has reinsurance in place to protect against both large individual third-party liability claims and also accumulations of risk with regard to property damage.

The Company's reinsurance arrangements are taken into account in order to calculate net technical provisions for Solvency II. The Company complies with Solvency II regulation by adjusting claims recoveries due from reinsurers for expected reinsurer default together with discounting expected future reinsurance recoveries using an expected payment pattern relevant to such cashflows.

The table below displays the Company's gross and net technical provisions, along with the Company's reinsurers' share of technical provisions:

Total Technical Provisions (€'000)			
	Gross	**Ceded**	**Net**
Total Solvency II Technical Provisions	310,981	27,280	283,701

3. Other Liabilities

This section contains information regarding the valuation of the balance sheet items. For each material liability class, the bases, methods and main assumptions used for Solvency II purposes are outlined.

The following table analyses the Company's financial liabilities at 31 December 2023:

	Other liabilities as at 31 December 2023	
	Solvency II Value €'000	Statutory Accounts Value €'000
Technical Provisions - non-life	289,621	294,014
Technical provisions - health (similar to non-life)	8,248	13,144
Technical Provisions - life (excluding unit linked and index linked)	13,112	12,810
Total Technical Provisions	**310,981**	**319,969**
Insurance and intermediaries payables	88,354	102,093
Reinsurance payables	728	728
Payables (trade, not insurance)	11,558	8,552
Total liabilities	**411,621**	**431,342**
Excess of assets over liabilities	**336,289**	**312,754**

Valuation of most financial liabilities are based on fair value for statutory purposes. In the paragraphs below, the valuation methodologies are described.

Insurance & intermediaries payables

The main differences between Solvency II and IFRS for insurance and intermediaries payables are the reclassification of the non-technical (aggregate deductible) liabilities to the technical provisions where the aggregate deductible settlement period had been reached, and an amount of future commission of approx. €2.4m that is included as an increase in technical provisions.

Reinsurance payables

This balance reflects amounts owed to reinsurers in respect of reinsurance agreements in place. There are no differences between the Solvency II valuation and the IFRS valuation of reinsurance payables.

Payables (trade, not insurance)

The difference between Solvency II and IFRS for payables is due to the increase in the tax liability which results from the increase in the financial result included in the Company's own funds (excess of assets over liabilities) under Solvency II.

As the Company does not currently have a Deferred Tax Asset any movements on the revenue of the Company will have an impact on the tax liability.

The Company operates a defined contribution pension scheme. The pension charge represents contributions payable by the Company to the scheme. As at 31 December 2023, there are no outstanding contributions.

The Company recognises operating leases with regards to office space and motor vehicles. The Company entered into two new motor vehicle operating leases during 2023.

4. Alternative Methods for Valuation

This section is not applicable to the Company as the Company does not use any alternative methods for valuation.

5. Any other information

The Company has no other disclosures to make in respect of the Company's Valuation for Solvency Purposes.

E Capital Management

1. Own Funds

a) Objectives / Policies / Processes for Managing Own Funds

The strategic objectives of capital management within the Company are:

- **Regulatory compliance:** To ensure compliance with the Company's regulatory capital requirements and in the case of adverse SCR levels, to set out the approach to recoverability including the consideration of capital relief measures and / or additional capital;
- **Liquidity:** To maintain sufficient liquidity to ensure the Company is able to meet its obligations in a timely manner and at a reasonable cost in accordance with the Company's Liquidity Risk Policy;
- **Efficient capital allocation:** To manage and allocate capital efficiently to achieve sustainable returns and facilitate growth objectives;
- **Financial strength:** To ensure access to capital markets on competitive terms, so that the company's overall cost of capital is minimised; and
- **Continuity of business:** All of the above objectives are consistent with the continuation of profitable business in line with the Company Strategy.

Taken together, these strategic goals seek to strengthen the Company's ability to withstand losses from adverse business and market conditions, enhance its financial flexibility and serve the interests of the Company's stakeholders.

The Company strives to ensure that it maintains capital levels which are consistent with the Company's Risk Appetite Framework and the Company's Strategy, at both a point in time and on a forward-looking basis.

The Company's capital planning process aims to be dynamic and forward-looking in relation to the Company's risk profile and takes into account the output from the Risk Management System and the Own Risk and Solvency Assessment ("ORSA") as part of capital planning activities.

Capital planning activities shall involve taking into account current and anticipated changes in the Company's risk profile, such as those reflected in its business plan, and forecasting the related impact on capital. In addition, as part of its capital planning, the Company shall integrate projected capital needs with its business planning and financial forecasting processes.

As part of the ORSA process, Solvency II balance sheet projections are prepared with solvency requirements based on the strategy and business plan of the Company projected over a 5-year time horizon.

Responsibility for the ongoing monitoring of the Company's Capital Management Policy has been assigned to the Company's Director of Finance, who, with the support of the Risk Function, Actuarial

Department and Compliance Function performs an annual review to ensure that the Capital Management Policy and the Capital Management Plan continue to be relevant to current and planned operations of the Company.

The Company's Capital Management Policy and the Capital Management Plan and Dividend Policy are monitored by the Audit Committee annually and presented to the Board for re-approval. The Company's SCR Assurance Process, which is designed to ensure that the Company complies with its capital requirements on an ongoing basis, forms part of the company's Capital Management Policy.

b) Own Funds by Tier

Under Solvency II Own Funds are classified into tiers, and there are eligibility requirements / limits applicable to the tiers to cover the SCR and MCR.

At present, the Company has only Tier 1 capital, i.e. the highest quality of capital available.

The Company's Director of Finance is responsible for ensuring that the Own Funds items meet the Solvency II eligibility requirements and are classified correctly. The Director of Finance is also responsible for ensuring that the terms and conditions of any Own Fund item are clear and unambiguous in relation to the Solvency II criteria.

Issuance of Own Fund items shall be in accordance with the Company's Capital Management Plan. As part of the business planning and ORSA processes, dividend payments and capital requirements shall be considered in conjunction with the Capital Management Plan.

The exhibit below outlines the Company's available Own Funds (by tier).

LPINS Own Funds (€'000)			
Available Own Funds		**2023**	**2022**
Share Premium, Issued Share Capital, Retained Earnings	Tier 1	325,484	300,764
	Tier 2	0	0
	Tier 3	0	0
Other own fund items approved by the supervisory authority as basic own funds not specified above	Tier 1	10,805	10,805
	Tier 2	0	0
	Tier 3	0	0
Total		**336,289**	**311,569**

c) Own Funds Eligible to Cover SCR

The exhibit below outlines the Company's Own Funds (by tier) which are available to cover the SCR:

LPINS Own Funds (€'000)			
Own Funds Eligible for SCR		**2023**	**2022**
Share Premium, Issued Share Capital, Retained Earnings	Tier 1 Tier 2 Tier 3	325,484 0 0	300,764 0 0
Other own fund items approved by the supervisory authority as basic own funds not specified above	Tier 1 Tier 2 Tier 3	10,805 0 0	10,805 0 0
Total		**336,289**	**311,569**

There has been no change in the quality of Own Funds available to cover the SCR, i.e. the Company only has Tier 1 capital. There was an increase of €24.7m in the amount of the Own Funds between 2022 and 2023. It is important to note that the Company's capital position has improved considerably during 2023 due to strong financial results for 2023, together with the contribution from written but not yet incepted business for 2023 offset by the dividend paid in 2023.

d) Own Funds Eligible to Cover MCR

The exhibit below outlines the Company's Own Funds (by tier) which are available to cover the MCR:

LPINS Own Funds (€'000)			
Own Funds Eligible for MCR		**2023**	**2022**
Share Premium, Issued Share Capital, Retained Earnings	Tier 1 Tier 2 Tier 3	325,484 0 0	300,764 0 0
Other own fund items approved by the supervisory authority as basic own funds not specified above	Tier 1 Tier 2 Tier 3	10,805 0 0	10,805 0 0
Total		**336,289**	**311,569**

The Own Funds available to cover the MCR are the same as those available to cover the SCR. Therefore, the reasons for the differences in Own Funds between 31 December 2022 and 31 December 2023 are as per section (c) above.

e) Differences between Equity in Financial Statements and Basic Own Funds

The Company's financial statements include a margin for prudence when calculating claims reserves. This margin is not included by the Company when calculating claims reserves for the purpose of the Solvency II Balance Sheet.

The table below outlines the Company's reconciliation reserve information:

LPINS Reconciliation Reserve (€'000)		
	2023	**2022**
Excess of assets over liabilities (A)	336,289	311,569
Other basic own fund items (B)	11,484	11,484
Total (A – B)	**324,805**	**300,085**

The reconciliation reserve increased by €24.7m during 2023. The main drivers for the increase are the financial results for 2023, together with the contribution from Written But Not Yet Incepted (WBNYI) business for 2023 offset by the dividend payment of €25m in December 2023.

The reconciliation reserve is essentially a formula driven number derived from the Solvency II balance sheet and any potential volatility in this reserve will be driven primarily by changes in the valuation of assets and the valuation of technical provisions and other liabilities (as discussed in Section D).

f) Own Funds Items subject to Transitional Arrangements

This guideline is not applicable to the Company as the Company does not have any Own Fund items that are subject to transitional arrangements.

g) Ancillary Own Funds

This guideline is not applicable to the Company as the Company does not have any ancillary Own Funds.

h) Restrictions on Own Funds

As required by the rules of the Portuguese Green Card Bureau, the Company has a charge in place over a designated bank account for the purposes of providing a guarantee required by that body. The Company maintains circa €600k in this designated bank account. In the event of strained capital circumstances, the Company cannot immediately draw upon this €600k and, as such, it represents a restriction to the Company's Own Funds.

2. Solvency Capital Requirement and Minimum Capital Requirement

a) Amount of SCR and MCR

The amounts of the Company's SCR and MCR are outlined below:

€'000	LPINS Capital Requirements
SCR	129,270
MCR	46,089

b) Amount of SCR by Risk Modules

The breakdown of the Company's SCR calculation by risk module is included in the table below Please note that diversification benefit explains the summation of the individual components exceeding the overall requirement.

€'000	LPINS Capital Requirements
Market risk	29,560
Counterparty default risk	16,640
Non-life underwriting risk	113,535
Health underwriting risk	41,508
Operational risk	8,675
Life underwriting risk	666
LACDT*	(22,812)
Diversification	(58,502)
SCR	**129,270**

*LACDT refers to the Loss Absorbing Capacity of Deferred Taxes.

c) Simplified Calculations and / or Company Specific Parameters

This guideline is not applicable to the Company as the Company does not use any simplified calculations or company specific parameters.

d) Undertaking Specific Parameters (USPs) and / or Capital Add-Ons

This guideline is not applicable to the Company as the Company does not use USPs or have any capital add-ons.

e) Amount of Capital Add-Ons

This guideline is not applicable to the Company as the Company does not have any capital add-ons.

f) Inputs for MCR

The Company's MCR is calculated by using a straight-line formula which incorporates net TPs and net premiums written for the last 12 months.

The prescribed MCR calculation applies both an upper and lower bound. The upper bound is equal to 45% of the corresponding SCR, while the lower bound is set at 25% of the SCR.

g) Loss-Absorbing Capacity of Deferred Taxes (LACDT)

The SCR is reduced to allow for the benefit arising from the Loss Absorbing Capacity of Deferred Taxes [LACDT] in the event of the Company incurring a loss equal in value to the BSCR (Basic SCR excluding any tax relief). Were this to occur, this would crystallise a tax loss which could be carried forward to offset future taxable profits. The monetisation of these future tax offsets is what underlies the reduction in SCR permitted by LACDT.

At year-end 2023, the LACDT benefit is used to reduce the overall SCR by €22.8m (from €152.08m to €129.27m). When calculating the year-end SCR amount, the Company typically calculates this amount by claiming full allowance for the LACDT. As part of the recent global tax accord, a minimum tax rate of 15% will apply to all firms globally where their turnover exceeds a prescribed minimum of €750m. Although the Company's turnover is less than €750m, the Company is part of a group which has turnover greater than €750m and accordingly the Corporation Tax Pillar 2 rules are considered to be applicable. Hence, the Company assumes a recoverability rate of 100% of the 15% LACDT allowance permissible by the European Insurance and Occupational Pensions Authority ("EIOPA"). No other tax rates (tax on unrealised gains, VAT, etc) could apply which would be relevant to this calculation.

The Company has placed a self-imposed cap on the amount of LACDT relief it will claim. As the self-imposed cap for claiming LACDT relief was not exceeded at year-end 2023, the full LACDT relief was claimed. The LACDT approach adopted is fully compliant with the updated EIOPA requirements around LACDT benefit (including the requirement to compile and maintain a Deferred Tax policy).

The future taxable profits are based on business projections (including future profits) within the time horizon of the Company's business plan (and no longer than 5 years into the future). Given that the period for recouping tax losses is relatively short, past losses carried forward are assumed to be utilised in full to offset future taxable profits. Assumptions used are believed to be realistic and achievable in nature and, in many cases, will be calibrated off past results.

3. Use of the duration-based equity risk sub-module in the calculation of the Solvency Capital Requirement

This section is not applicable to the Company as the Company does not use the duration-based equity risk sub-module when calculating its SCR.

4. Differences between the standard formula and any internal model Information

This section is not applicable to the Company as the Company does not use an internal model when calculating its SCR.

5. Non-compliance with the Minimum Capital Requirement and non-compliance with the Solvency Capital Requirement

The Company complied with the Minimum Capital Requirement and the Solvency Capital Requirement during 2023.

The Company has a Capital Management Policy and a Capital Management Plan in place which set out the Company's approach to the setting and monitoring of capital resources, not just at a particular point in time, but over the business planning period. One of the strategic objectives of capital management within the Company is to ensure compliance with the regulatory capital requirements and in the case of adverse SCR levels, the approach to recoverability including the consideration of capital relief measures and/additional capital.

The Company's capital position is monitored on an ongoing basis in accordance with its Risk Appetite Framework. Specifically, outside of the annual requirement to calculate a SCR, the Company calculates approximate SCRs on a quarterly basis and these are reported to the CBI as part of the quarterly QRTs. In order to ensure appropriate levels of capital at all times, the Company has defined ranges around its capital risk appetites with thresholds and limits that shall trigger actions.

The Board is responsible for approving and adopting this Capital Management Policy and ensuring sufficient oversight of Capital Management on an on-going basis.

6. Any other information

The Company has no other disclosures to make in respect of the Company’s Capital Management.

Appendix I: Glossary

Term	Definition
AOTP	Actuarial Opinion on Technical Provisions
ARTP	Actuarial Report on Technical Provisions
CBI	Central Bank of Ireland
DFM	Development Factor Method
EEA	European Economic Area
EIOPA	European Insurance and Occupational Pensions Authority
ENID	Events Not In Data
EPIFP	Expected Profits in Future Premium
FOS	Freedom of Service
ICT	Information and Communications Technology
IFRS	International Financial Reporting Standards
MCR	Minimum Capital Requirement
MTPL	Motor Third Party Liability
OECD	Organisation for Economic Cooperation and Development
ONR	Online Reporting System
ORSA	Own Risk and Solvency Assessment
PCF	Pre-Approved Control Functions
PPOs	Periodical Payment Orders
QRT	Quantitative Reporting Template
SCR	Solvency Capital Requirement
SFCR	Solvency and Financial Condition Report
S&P	Standard & Poor's
TPL	Third Party Liability
UPR	Unearned Premium Reserve
USPs	Undertaking Specific Parameters
VYE	Vehicle Year Exposure
WBNYI	Written but not yet incepted

Appendix II: LPINS Related parties

The Company’s related parties during the year included the following entities:

Accident Management Services B.V, Almere
Accident Management Services Norge AS, Oslo
Accident Management Services S.R.L., Bucharest
Auto Claims Handling Danmark AS, Copenhagen
Claims Management Sverige AB, Stockholm
Fleet Accident Management Services Sp. z.o.o., Warsaw
Fleet Cover Sociedade Mediacao de Seguros Lda, Lisbon
Fleet Insurance Plan s.r.o., Prague (ceased to be a related party in August 2023)
Garanthia Plan SL, Madrid
LeasePlan Ceska Republika s.r.o., Prague (ceased to be a related party in August 2023)
LeasePlan Danmark AS, Copenhagen
LeasePlan Deutschland GmbH, Düsseldorf
LeasePlan Digital B.V., Amsterdam
LeasePlan Finance N.V (Dublin Branch), Dublin
LeasePlan Finland Oy, Helsinki (ceased to be a related party in August 2023)
LeasePlan Fleet Management (Polska) Sp. z o.o., Warsaw
LeasePlan Fleet Management Services Ireland Ltd, Dublin
LeasePlan Fleet Management N.V., Zavantem
LeasePlan France S.A.S., Paris
LeasePlan Hellas S.A., Athens
LeasePlan Hungaria Zrt, Budapest
LeasePlan Italia S.p.A., Milan
LeasePlan Luxembourg, Luxemburg (ceased to be a related party in August 2023)
LeasePlan Nederland N.V., Amsterdam
LeasePlan Norge AS, Oslo
LeasePlan Österreich Fuhrparkmanagement GmbH, Vienna
LeasePlan Partnerships & Alliances N.V., Zavantem
LeasePlan Portugal Comercio e Aluguer de Automoveis e Equipamentos Unipessoal Lda., Lisbon
LeasePlan Romania SRL, Bucharest
LeasePlan Rechtshulp B.V, Amsterdam
LeasePlan Servicios S.A., Madrid
LeasePlan Slovakia s.r.o., Bratislava
LeasePlan Sverige AB, Stockholm
LeasePlan Truck N.V., Zavantem
LeasePlan Versicherungsvermittlungsgesellschaft mbH, Düsseldorf
Societe de Courtages d'Assurances Groupe SARL, Paris

Appendix III: Quantitative Reporting Templates ("QRTs")

The table below lists the annual disclosure quantitative templates submitted to the CBI in respect of the year ending 31 December 2023:

Code	Template Name
S.02.01.02	Balance Sheet
S.04.05.21	Activity by country - location of risk
S.05.01.02	Premiums, claims and expenses by line of business
S.12.01.02	Life and Health SLT Technical Provisions
S.17.01.02	Non-Life Technical Provisions
S.19.01.21	Non-Life Insurance claims information
S.23.01.01	Own Funds
S.25.01.21	SCR - for undertakings on Standard Formula
S.28.01.01	MCR - for undertakings on Standard Formula

1. S.02.01.02

			Solvency II value
			C0010
Assets	Goodwill	R0010	----
	Deferred acquisition costs	R0020	----
	Intangible assets	R0030	
	Deferred tax assets	R0040	
	Pension benefit surplus	R0050	
	Property, plant & equipment held for own use	R0060	1,865,508.29
	Investments (other than assets held for index-linked and unit-linked contracts)	R0070	527,338,745.19
	Property (other than for own use)	R0080	
	Holdings in related undertakings, including participations	R0090	
	Equities	R0100	
	Equities - listed	R0110	
	Equities - unlisted	R0120	
	Bonds	R0130	84,101,536.34
	Government Bonds	R0140	14,631,114.59
	Corporate Bonds	R0150	69,470,421.75
	Structured notes	R0160	
	Collateralised securities	R0170	
	Collective Investments Undertakings	R0180	
	Derivatives	R0190	
	Deposits other than cash equivalents	R0200	443,237,208.85
	Other investments	R0210	
	Assets held for index-linked and unit-linked contracts	R0220	
	Loans and mortgages	R0230	
	Loans on policies	R0240	
	Loans and mortgages to individuals	R0250	
	Other loans and mortgages	R0260	
	Reinsurance recoverables from:	R0270	27,279,816.85
	Non-life and health similar to non-life	R0280	18,034,101.00
	Non-life excluding health	R0290	18,012,431.92
	Health similar to non-life	R0300	21,669.07
	Life and health similar to life, excluding health and index-linked and unit-linked	R0310	9,245,715.85
	Health similar to life	R0320	
	Life excluding health and index-linked and unit-linked	R0330	9,245,715.85
	Life index-linked and unit-linked	R0340	
	Deposits to cedants	R0350	
	Insurance and intermediaries receivables	R0360	44,821,462.07
	Reinsurance receivables	R0370	
	Receivables (trade, not insurance)	R0380	486,672.02
	Own shares (held directly)	R0390	
	Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	
	Cash and cash equivalents	R0410	146,118,054.29
	Any other assets, not elsewhere shown	R0420	
	Total assets	R0500	747,910,258.72

			Solvency II value
			C0010
Liabilities	Technical provisions - non-life	R0510	297,868,952.12
	Technical provisions - non-life (excluding health)	R0520	289,621,430.38
	Technical provisions calculated as a whole	R0530	
	Best Estimate	R0540	268,833,601.41
	Risk margin	R0550	20,787,828.97
	Technical provisions - health (similar to non-life)	R0560	8,247,521.74
	Technical provisions calculated as a whole	R0570	
	Best Estimate	R0580	7,437,293.71
	Risk margin	R0590	810,228.03
	Technical provisions - life (excluding index-linked and unit-linked)	R0600	13,111,919.01
	Technical provisions - health (similar to life)	R0610	
	Technical provisions calculated as a whole	R0620	
	Best Estimate	R0630	
	Risk margin	R0640	
	Technical provisions - life (excluding health and index-linked and unit-linked)	R0650	13,111,919.01
	Technical provisions calculated as a whole	R0660	
	Best Estimate	R0670	10,535,852.01
	Risk margin	R0680	2,576,067.00
	Technical provisions - index-linked and unit-linked	R0690	
	Technical provisions calculated as a whole	R0700	
	Best Estimate	R0710	
	Risk margin	R0720	
	Other technical provisions	R0730	----
	Contingent liabilities	R0740	
	Provisions other than technical provisions	R0750	
	Pension benefit obligations	R0760	
	Deposits from reinsurers	R0770	
	Deferred tax liabilities	R0780	
	Derivatives	R0790	
	Debts owed to credit institutions	R0800	
	Financial liabilities other than debts owed to credit institutions	R0810	1,848,587.27
	Insurance & intermediaries payables	R0820	88,353,564.81
	Reinsurance payables	R0830	728,433.55
	Payables (trade, not insurance)	R0840	9,709,704.80
	Subordinated liabilities	R0850	
	Subordinated liabilities not in Basic Own Funds	R0860	
	Subordinated liabilities in Basic Own Funds	R0870	
	Any other liabilities, not elsewhere shown	R0880	
	Total liabilities	R0900	411,621,161.56
Excess of assets over liabilities		R1000	336,289,097.16

2. S.04.05.21

Home country: non-life insurance and reinsurance obligations

			Home Country
			C0010
Premiums written (gross)	Gross Written Premium (direct)	**R0020**	1,937,041.36
	Gross Written Premium (proportional reinsurance)	**R0021**	
	Gross Written Premium (non-proportional reinsurance)	**R0022**	
Premiums earned (gross)	Gross Earned Premium (direct)	**R0030**	2,115,337.97
	Gross Earned Premium (proportional reinsurance)	**R0031**	
	Gross Earned Premium (non-proportional reinsurance)	**R0032**	
Claims incurred (gross)	Claims incurred (direct)	**R0040**	6,253,030.31
	Claims incurred (proportional reinsurance)	**R0041**	168,202.46
	Claims incurred (non-proportional reinsurance)	**R0042**	
Expenses incurred (gross)	Gross Expenses Incurred (direct)	**R0050**	6,905,253.06
	Gross Expenses Incurred (proportional reinsurance)	**R0051**	
	Gross Expenses Incurred (non-proportional reinsurance)	**R0052**	

Top 5 countries (by amount of gross premiums written) : non-life insurance and reinsurance obligations

			Top 5 countries: non-life	Top 5 countries: non-life	Top 5 countries: non-life	Top 5 countries: non-life	Top 5 countries: non-life
			C0020	**C0020**	**C0020**	**C0020**	**C0020**
Country		**R0010**	(NL) NETHERLANDS	(PT) PORTUGAL	(ES) SPAIN	(PL) POLAND	(FR) FRANCE
Premiums written (gross)	Gross Written Premium (direct)	**R0020**	50,009,992.20	41,757,677.22	41,193,389.89	36,481,206.18	19,229,588.82
	Gross Written Premium (proportional reinsurance)	**R0021**					
	Gross Written Premium (non-proportional reinsurance)	**R0022**					
Premiums earned (gross)	Gross Earned Premium (direct)	**R0030**	50,275,633.16	43,995,632.15	41,705,197.68	33,925,634.32	20,983,313.14
	Gross Earned Premium (proportional reinsurance)	**R0031**					
	Gross Earned Premium (non-proportional reinsurance)	**R0032**					
Claims incurred (gross)	Claims incurred (direct)	**R0040**	17,888,327.41	25,459,991.69	22,232,100.84	17,139,561.87	7,764,200.98
	Claims incurred (proportional reinsurance)	**R0041**					
	Claims incurred (non-proportional reinsurance)	**R0042**					
Expenses incurred (gross)	Gross Expenses Incurred (direct)	**R0050**	9,216,218.76	5,797,567.46	5,893,864.40	5,861,825.47	2,146,784.33
	Gross Expenses Incurred (proportional reinsurance)	**R0051**					
	Gross Expenses Incurred (non-proportional reinsurance)	**R0052**					

Home country: life insurance and reinsurance obligations

		Home Country
		C0030
Gross Written Premium	**R1020**	
Gross Earned Premium	**R1030**	
Claims incurred	**R1040**	
Gross Expenses Incurred	**R1050**	

Top 5 countries (by amount of gross premiums written) : life insurance and reinsurance obligations

		Top 5 countries: life and health SLT	Top 5 countries: life and health SLT	Top 5 countries: life and health SLT	Top 5 countries: life and health SLT	Top 5 countries: life and health SLT
		C0040	**C0040**	**C0040**	**C0040**	**C0040**
Country	**R1010**					
Gross Written Premium	**R1020**					
Gross Earned Premium	**R1030**					
Claims incurred	**R1040**					
Gross Expenses Incurred	**R1050**					

3. S.05.01.02

Premiums, claims and expenses by line of business

Non-Life (direct business/accepted proportional reinsurance and accepted non-proportional reinsurance)

			Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)												Total
			Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	
			C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0200
Premiums written	Gross - Direct Business	R0110		12,617,605.95		137,767,466.10	112,960,571.27		563,903.01			1,599,593.78	7,891,554.43	11,513,514.75	284,914,209.29
	Gross - Proportional reinsurance accepted	R0120													
	Gross - Non-proportional reinsurance accepted	R0130	----	----	----	----	----	----	----	----	----	----	----	----	
	Reinsurers' share	R0140				6,810,843.52	2,129,743.67						1,255,954.82		10,196,542.01
	Net	R0200		12,617,605.95		130,956,622.58	110,830,827.59		563,903.01			1,599,593.78	6,635,599.61	11,513,514.75	274,717,667.28
Premiums earned	Gross - Direct Business	R0210		13,000,912.37		137,047,905.48	117,079,185.89		571,692.73			1,583,367.90	7,795,201.70	12,132,521.70	289,210,787.77
	Gross - Proportional reinsurance accepted	R0220													
	Gross - Non-proportional reinsurance accepted	R0230	----	----	----	----	----	----	----	----	----	----	----	----	
	Reinsurers' share	R0240				6,810,843.52	2,129,743.67						1,255,954.82		10,196,542.01
	Net	R0300		13,000,912.37		130,237,061.96	114,949,442.21		571,692.73			1,583,367.90	6,539,246.88	12,132,521.70	279,014,245.76
Claims incurred	Gross - Direct Business	R0310		2,254,955.39		67,814,883.20	98,325,625.84		31,480.11			350,945.12	3,112,259.90	444,677.12	172,334,826.68
	Gross - Proportional reinsurance accepted	R0320					168,202.46								168,202.46
	Gross - Non-proportional reinsurance accepted	R0330	----	----	----	----	----	----	----	----	----	----	----	----	
	Reinsurers' share	R0340		-241.33		-2,105,471.34	10,791,462.91		-2.00			-10.00	-95,428.38	-12.00	8,590,297.85
	Net	R0400		2,255,196.72		69,920,354.54	87,702,365.39		31,482.11			350,955.12	3,207,688.28	444,689.12	163,912,731.29
Expenses incurred		R0550													
Balance - other technical expenses/income		R1210	----	----	----	----	----	----	----	----	----	----	----	----	
Total technical expenses		R1300	----	----	----	----	----	----	----	----	----	----	----	----	

Premiums, claims and expenses by line of business

Life

			Line of Business for: life insurance obligations						Life reinsurance obligations		Total
			Health insurance	Insurance with profit participation	Index-linked and unit-linked insurance	Other life insurance	Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations	Health reinsurance	Life reinsurance	
			C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0300
Premiums written	Gross	R1410									
	Reinsurers' share	R1420									
	Net	R1500									
Premiums earned	Gross	R1510									
	Reinsurers' share	R1520									
	Net	R1600									
Claims incurred	Gross	R1610						3,271,118.26			3,271,118.26
	Reinsurers' share	R1620						3,271,118.26			3,271,118.26
	Net	R1700						0.00			0.00
Expenses incurred		R1900									
Balance - other technical expenses/income		R2510	----	----	----	----	----	----	----	----	
Total technical expenses		R2600	----	----	----	----	----	----	----	----	
Total amount of surrenders		R2700									

4. S.12.01.02

Life and Health SLT Technical Provisions

		Insurance with profit participation	Index-linked and unit-linked insurance			Other life insurance			Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Accepted reinsurance	Total (Life other than health insurance, incl. Unit-Linked)	Health insurance (direct business)			Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Health reinsurance (reinsurance accepted)	Total (Health similar to life insurance)
				Contracts without options and guarantees	Contracts with options or guarantees		Contracts without options and guarantees	Contracts with options or guarantees					Contracts without options and guarantees	Contracts with options or guarantees			
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0150	C0160	C0170	C0180	C0190	C0200	C0210
Technical provisions calculated as a whole	R0010			----	----		----	----					----	----			
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole	R0020			----	----		----	----					----	----			
Technical provisions calculated as a sum of BE and RM – Best Estimate – Gross Best Estimate	R0030		----			----			10,535,852.01		10,535,852.01	----					
Technical provisions calculated as a sum of BE and RM – Best Estimate – Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0080		----			----			9,245,715.85		9,245,715.85	----					
Technical provisions calculated as a sum of BE and RM – Best Estimate – Best estimate minus recoverables from reinsurance/SPV and Finite Re - total	R0090		----			----			1,290,136.16		1,290,136.16	----					
Technical provisions calculated as a sum of BE and RM – Risk margin	R0100			----	----		----	----	2,576,066.51		2,576,066.51		----	----			
Technical provisions - total	R0200			----	----		----	----	13,111,918.52		13,111,918.52		----	----			

5. S.17.01.02

Non-life Technical Provisions

					Direct business and accepted proportional reinsurance												Accepted non-proportional reinsurance				Total Non-Life obligation
					Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance	
					C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180
Technical provisions calculated as a whole				R0010																	
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole				R0050																	
Technical provisions calculated as a sum of BE and RM	Best Estimate	Premium provisions	Gross	R0060		-4,284,067.64		-17,589,722.96	-3,920,296.42		-245,708.17			-921,862.99	-1,695,556.32	-7,525,445.42					-36,182,659.92
			Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140		20,175.33		-5,085,457.72	-1,328,380.27						-875,403.95						-7,269,066.61
			Net Best Estimate of Premium Provisions	R0150		-4,304,242.97		-12,504,265.23	-2,591,916.14		-245,708.17			-921,862.99	-820,152.37	-7,525,445.42					-28,913,593.31
		Claims provisions	Gross	R0160		11,721,361.35		236,907,647.33	58,502,558.07		54,091.35			1,215,787.26	733,932.95	3,318,176.90					312,453,555.21
			Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240		1,493.75		12,500,172.32	12,805,072.96							-3,571.41					25,303,167.62
			Net Best Estimate of Claims Provisions	R0250		11,719,867.61		224,407,475.01	45,697,485.11		54,091.35			1,215,787.26	733,932.95	3,321,748.31					287,150,387.60
	Total Best estimate - gross			R0260		7,437,293.71		219,317,924.37	54,582,261.65		-191,616.82			293,924.27	-961,623.36	-4,207,268.53					276,270,895.29
	Total Best estimate - net			R0270		7,415,624.63		211,903,209.78	43,105,568.96		-191,616.82			293,924.27	-86,219.42	-4,203,697.12					258,236,794.29
	Risk margin			R0280		810,228.03		16,376,017.32	4,043,934.06		3,739.01			84,040.15	50,732.42	229,365.84					21,598,056.83
Technical provisions - total	Technical provisions - total			R0320		8,247,521.74		235,693,941.69	58,626,195.71		-187,877.81			377,964.42	-910,890.94	-3,977,902.69					297,868,952.12
	Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total			R0330		21,669.08		7,414,714.60	11,476,692.69						-875,403.95	-3,571.41					18,034,101.00
	Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total			R0340		8,225,852.66		228,279,227.10	47,149,503.02		-187,877.81			377,964.42	-35,487.00	-3,974,331.28					279,834,851.12

6. S.19.01.21

Gross claims paid (non-cumulative) - development year (absolute amount). Total non-life business

Accident year / Underwriting year	Z0020	(2) 2 - Underwriting year

		0	1	2	3	4	5	6	7	8	9	10 & +
		C0010	**C0020**	**C0030**	**C0040**	**C0050**	**C0060**	**C0070**	**C0080**	**C0090**	**C0100**	**C0110**
Prior	**R0100**	----	----	----	----	----	----	----	----	----	----	2,562,468.95
N-9	**R0160**	43,627,065.42	20,019,426.40	6,660,833.57	2,575,707.72	1,730,760.99	807,809.97	1,029,753.36	1,550,503.24	938,650.17	790,350.33	----
N-8	**R0170**	47,166,518.31	25,842,600.38	5,971,616.94	3,655,772.31	2,037,105.14	1,751,720.18	943,219.91	1,157,597.31	2,344,004.24	----	----
N-7	**R0180**	50,008,606.06	28,833,302.59	9,295,986.48	2,395,401.00	2,409,003.03	2,876,935.75	1,530,524.75	1,388,651.93	----	----	----
N-6	**R0190**	57,759,243.30	33,999,456.87	10,759,974.58	2,487,814.66	3,458,665.04	1,095,988.66	2,359,015.57	----	----	----	----
N-5	**R0200**	71,889,603.15	43,653,759.73	9,436,168.35	6,134,258.22	4,213,929.86	4,698,230.22	----	----	----	----	----
N-4	**R0210**	80,207,861.96	38,547,772.31	7,999,752.87	6,442,162.23	3,872,669.35	----	----	----	----	----	----
N-3	**R0220**	71,295,414.08	26,160,428.71	5,941,047.00	2,657,700.00	----	----	----	----	----	----	----
N-2	**R0230**	69,944,523.94	33,866,662.80	5,721,636.10	----	----	----	----	----	----	----	----
N-1	**R0240**	76,786,653.37	38,451,066.17	----	----	----	----	----	----	----	----	----
N	**R0250**	88,752,820.52	----	----	----	----	----	----	----	----	----	----

Gross claims paid (non-cumulative) - current year, sum of years (cumulative). Total non-life business

Accident year / Underwriting year	Z0020	(2) 2 - Underwriting year

		In Current year	Sum of years (cumulative)
		C0170	**C0180**
Prior	**R0100**	2,562,468.95	2,562,468.95
N-9	**R0160**	790,350.33	79,730,861.16
N-8	**R0170**	2,344,004.24	90,870,154.72
N-7	**R0180**	1,388,651.93	98,738,411.59
N-6	**R0190**	2,359,015.57	111,920,158.68
N-5	**R0200**	4,698,230.22	140,025,949.53
N-4	**R0210**	3,872,669.35	137,070,218.72
N-3	**R0220**	2,657,700.00	106,054,589.80
N-2	**R0230**	5,721,636.10	109,532,822.83
N-1	**R0240**	38,451,066.17	115,237,719.54
N	**R0250**	88,752,820.52	88,752,820.52
Total	**R0260**	153,598,613.37	1,080,496,176.04

Difference in Basis between above Triangle and Financial Statements: The Company's paid claims triangles are produced using claims bordereaux provided by the Company's claims handlers. These bordereaux record the timing of payments made by the claims handlers themselves, and thus the triangles are produced based on these timings. These timings contrast to those used to produce the paid figure in the Company's Profit and Loss Account ("P+L"). In the P+L, the timings used are the point at which the Company makes payments to the claims handlers.

Other areas where there are differences between the basis used for the paid claims triangles and the P+L are: - Currency rates, i.e. point in time against built up over the reporting period; - adjustments made to the P+L for previous years; and - the timing of deductible refunds.

Gross undiscounted best estimate claims provisions - development year (absolute amount). Total non-life business

Accident year / Underwriting year	Z0020	(2) 2 - Underwriting year

		0	1	2	3	4	5	6	7	8	9	10 & +
		C0200	**C0210**	**C0220**	**C0230**	**C0240**	**C0250**	**C0260**	**C0270**	**C0280**	**C0290**	**C0300**
Prior	**R0100**	----	----	----	----	----	----	----	----	----	----	14,901,141.93
N-9	**R0160**			21,112,209.58	14,789,969.59	9,287,607.48	8,160,004.45	5,140,244.16	4,057,696.05	3,711,159.39	3,543,947.27	----
N-8	**R0170**		35,635,639.94	24,698,245.53	18,707,035.81	14,342,104.41	9,651,673.15	7,762,293.87	6,868,909.86	4,042,482.21	----	----
N-7	**R0180**	74,117,684.38	47,551,919.36	28,805,522.92	21,620,477.34	13,603,902.70	8,326,652.45	7,092,231.17	5,649,314.14	----	----	----
N-6	**R0190**	81,234,571.50	49,709,693.96	29,656,200.92	22,121,859.59	14,285,048.19	14,976,241.12	10,832,237.17	----	----	----	----
N-5	**R0200**	92,951,404.89	64,245,048.51	48,747,761.57	31,993,268.20	28,029,674.08	20,587,197.42	----	----	----	----	----
N-4	**R0210**	86,802,566.80	59,883,532.29	40,556,243.43	35,748,434.97	26,276,412.96	----	----	----	----	----	----
N-3	**R0220**	91,481,489.34	47,951,945.51	37,272,727.46	25,660,146.24	----	----	----	----	----	----	----
N-2	**R0230**	96,272,021.53	55,980,668.08	48,336,627.36	----	----	----	----	----	----	----	----
N-1	**R0240**	96,296,143.35	51,780,609.77	----	----	----	----	----	----	----	----	----
N	**R0250**	125,215,610.30	----	----	----	----	----	----	----	----	----	----

Gross discounted best estimate claims provisions - current year, sum of years (cumulative). Total non-life business

Accident year / Underwriting year	Z0020	(2) 2 - Underwriting year

		Year end (discounted data)
		C0360
Prior	**R0100**	14,487,571.39
N-9	**R0160**	3,371,822.85
N-8	**R0170**	3,832,670.94
N-7	**R0180**	5,350,092.81
N-6	**R0190**	10,127,130.77
N-5	**R0200**	19,204,757.88
N-4	**R0210**	24,042,405.56
N-3	**R0220**	23,754,035.99
N-2	**R0230**	45,097,841.07
N-1	**R0240**	48,155,130.37
N	**R0250**	115,030,095.59
Total	**R0260**	312,453,555.22

7. S.23.01.01

Own funds

			Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
			C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation (EU) 2015/35	Ordinary share capital (gross of own shares)	R0010	679,000.00	679,000.00	----		----
	Share premium account related to ordinary share capital	R0030			----		----
	Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040			----		----
	Subordinated mutual member accounts	R0050		----			
	Surplus funds	R0070			----	----	----
	Preference shares	R0090		----			
	Share premium account related to preference shares	R0110		----			
	Reconciliation reserve	R0130	324,805,097.17	324,805,097.17	----	----	----
	Subordinated liabilities	R0140		----			
	An amount equal to the value of net deferred tax assets	R0160		----	----	----	
	Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180	10,805,000.00	10,805,000.00			
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds		R0220		----	----	----	----
Deductions	Deductions for participations in financial and credit institutions	R0230					
Total basic own funds after deductions		R0290	336,289,097.17	336,289,097.17			
Ancillary own funds	Unpaid and uncalled ordinary share capital callable on demand	R0300		----	----		----
	Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310		----	----		----
	Unpaid and uncalled preference shares callable on demand	R0320		----	----		
	A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330		----	----		
	Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340		----	----		----
	Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350		----	----		
	Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360		----	----		----
	Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370		----	----		
	Other ancillary own funds	R0390		----	----		
Total ancillary own funds		R0400		----	----		
Available and eligible own funds	Total available own funds to meet the SCR	R0500	336,289,097.17	336,289,097.17			
	Total available own funds to meet the MCR	R0510	336,289,097.17	336,289,097.17			----
	Total eligible own funds to meet the SCR	R0540	336,289,097.17	336,289,097.17			
	Total eligible own funds to meet the MCR	R0550	336,289,097.17	336,289,097.17			----
SCR		R0580	129,269,631.04	----	----	----	----
MCR		R0600	46,089,130.00	----	----	----	----
Ratio of Eligible own funds to SCR		R0620	260.145476%	----	----	----	----
Ratio of Eligible own funds to MCR		R0640	729.649479%	----	----	----	----

Reconciliation reserve

Reconciliation reserve			C0060
	Excess of assets over liabilities	R0700	336,289,097.17
	Own shares (held directly and indirectly)	R0710	
	Foreseeable dividends, distributions and charges	R0720	
	Other basic own fund items	R0730	11,484,000.00
	Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	
		R0760	324,805,097.17
Expected profits	Expected profits included in future premiums (EPIFP) - Life business	R0770	
	Expected profits included in future premiums (EPIFP) - Non-life business	R0780	54,569,782.78
Total Expected profits included in future premiums (EPIFP)		R0790	54,569,782.78

8. S.25.01.21

Basic Solvency Capital Requirement

		Gross solvency capital requirement	Simplifications
		C0110	C0120
Market risk	R0010	29,559,822.43	
Counterparty default risk	R0020	16,640,224.17	----
Life underwriting risk	R0030	666,447.28	
Health underwriting risk	R0040	41,507,686.36	
Non-life underwriting risk	R0050	113,534,758.62	
Diversification	R0060	-58,502,428.93	----
Intangible asset risk	R0070		----
Basic Solvency Capital Requirement	R0100	143,406,509.94	----

Calculation of Solvency Capital Requirement

			Value
			C0100
Operational risk		R0130	8,675,408.93
Loss-absorbing capacity of technical provisions		R0140	0.00
Loss-absorbing capacity of deferred taxes		R0150	-22,812,287.83
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC		R0160	0.00
Solvency capital requirement excluding capital add-on		R0200	129,269,631.04
Capital add-on already set		R0210	
	of which, capital add-ons already set - Article 37 (1) Type a	R0211	
	of which, capital add-ons already set - Article 37 (1) Type b	R0212	
	of which, capital add-ons already set - Article 37 (1) Type c	R0213	
	of which, capital add-ons already set - Article 37 (1) Type d	R0214	
Solvency Capital Requirement		R0220	129,269,631.04
Other information on SCR	Capital requirement for duration-based equity risk sub-module	R0400	0.00
	Total amount of Notional Solvency Capital Requirements for remaining part	R0410	
	Total amount of Notional Solvency Capital Requirements for ring-fenced funds	R0420	
	Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	R0430	
	Diversification effects due to RFF nSCR aggregation for article 304	R0440	

Approach to tax rate

		YES/NO
		C0109
Approach based on average tax rate	R0590	(2) 2 - No

Calculation of loss absorbing capacity of deferred taxes

			LAC DT
			C0130
LAC DT		R0640	-22,812,287.83
	LAC DT justified by reversion of deferred tax liabilities	R0650	0.00
	LAC DT justified by reference to probable future taxable economic profit	R0660	-22,812,287.83
	LAC DT justified by carry back, current year	R0670	0.00
	LAC DT justified by carry back, future years	R0680	0.00
	Maximum LAC DT	R0690	-22,812,287.83

9. S.28.01.01

Linear formula component for non-life insurance and reinsurance obligations

		MCR components
		C0010
MCRNL Result	R0010	46,062,037.14

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
		C0020	C0030
Medical expense insurance and proportional reinsurance	R0020		
Income protection insurance and proportional reinsurance	R0030	7,415,624.63	12,618,399.87
Workers' compensation insurance and proportional reinsurance	R0040		
Motor vehicle liability insurance and proportional reinsurance	R0050	211,903,209.78	130,970,713.85
Other motor insurance and proportional reinsurance	R0060	43,105,568.96	110,830,891.22
Marine, aviation and transport insurance and proportional reinsurance	R0070		
Fire and other damage to property insurance and proportional reinsurance	R0080		563,903.01
General liability insurance and proportional reinsurance	R0090		
Credit and suretyship insurance and proportional reinsurance	R0100		
Legal expenses insurance and proportional reinsurance	R0110	293,924.27	1,599,862.83
Assistance and proportional reinsurance	R0120		6,635,599.61
Miscellaneous financial loss insurance and proportional reinsurance	R0130		11,513,514.76
Non-proportional health reinsurance	R0140		
Non-proportional casualty reinsurance	R0150		
Non-proportional marine, aviation and transport reinsurance	R0160		
Non-proportional property reinsurance	R0170		

Linear formula component for life insurance and reinsurance obligations

		C0040
MCRL Result	R0200	27,092.86

Total capital at risk for all life re insurance obligations

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
		C0050	C0060
Obligations with profit participation - guaranteed benefits	R0210		----
Obligations with profit participation - future discretionary benefits	R0220		----
Index-linked and unit-linked insurance obligations	R0230		----
Other life (re)insurance and health (re)insurance obligations	R0240	1,290,136.16	----
Total capital at risk for all life (re)insurance obligations	R0250	----	

Overall MCR calculation

		C0070
Linear MCR	**R0300**	46,089,130.00
SCR	**R0310**	129,269,631.04
MCR cap	**R0320**	58,171,333.97
MCR floor	**R0330**	32,317,407.76
Combined MCR	**R0340**	46,089,130.00
Absolute floor of the MCR	**R0350**	3,700,000.00
Minimum Capital Requirement	**R0400**	46,089,130.00