Arkema Insurance dac

Solvency and Financial Condition Report ("SFCR") for the financial year ended 31 December 2018

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Executive Summary

The new, harmonized EU-wide regulatory regime for Insurance Companies, known as Solvency II, came into force with effect from 1 January 2016. The regime requires new reporting and public disclosure arrangements to be put in place by (re)insurers. This document is the second version of the Solvency and Financial Condition Report ("SFCR") that is required to be prepared by Arkema Insurance dac (''the Company').

This report covers the Business and Performance of the Company, its System of Governance, Risk Profile, Valuation for Solvency Purposes and Capital Management.

Company Background

Arkema Insurance dac is a company incorporated in Ireland and authorised by the Central Bank of Ireland to carry out the following classes of non-life insurance business:

- Class 8: Fire and Natural Forces
- Class 9: Other Damage to Property
- Class 16: Miscellaneous Financial Loss

The principal activity of the Company is to undertake and carry out the business of insurance of Property Damage & Business Interruption risks of Arkema Group companies.

Business and Performance

The Company's financial year end is 31 December each year. The Company earned pre-tax profits of EUR 7,471k for the year ended 31 December 2018 (2017: EUR Loss 797k). The profits have been driven by a strong underwriting performance. No dividends were paid during the year.

System of Governance

The Company is subject to the Central Bank of Ireland's Corporate Governance Requirements for Captive Insurance and Captive Reinsurance Undertakings 2015. The corporate governance principles of the Company are implemented via the following Corporate Governance Framework:

- Board of Directors
- Outsourced Service Providers
- Internal Control Framework
- Risk Management Framework
- Compliance Function
- Audit – Internal & External

Outsourced Activities

The following is a list of the important outsourced operational functions together with the jurisdiction in which the service providers of such functions or activities are located:

Outsourced Provider	Service Outsourced	Internal/ External
Marsh Management Services (Dublin) Limited	Captive administrator	External
	Compliance Function	
	Risk Management Function	
Michel Simon	Chief Risk Officer (PCF-14)	Internal
Philippe Marchal	Internal Audit Function (PCF-13)	Internal
Marsh SAS France	Head of Actuarial Function (PCF-48)	External

Risk Profile

The following table outlines the material risks to which the Company is exposed as well as the undiversified capital charge associated with the risks.

Risk	Capital Charge EUR '000
Market Risk	10,694
Counterparty Default Risk	414
Non-life Underwriting Risk	21,361

These risks are covered in further detail in Section C of this report.

Valuation for Solvency Purposes

The Company's assets and liabilities, under Solvency II methodology, are valued at best estimate. This differs in some respects from the GAAP valuations for financial statements. In particular, the technical provisions for Solvency II balance sheet represent the present value of future claim payments. A risk margin is also included in the technical provisions, which represents the cost of holding the solvency capital requirement. Section D of the SFCR shows the comparison between the Solvency II balance sheet and the Financial Statements.

Capital Management

The objective of own funds management is to maintain, at all times, sufficient own funds to cover the SCR and MCR with an appropriate buffer. As part of own funds management, the Company prepares ongoing annual solvency projections and reviews the structure of own funds and future requirements. The business plan, which forms the basis of the ORSA contains a three year projection of funding

requirements and helps focus actions for future funding.

The Company is a single shareholder entity whose ordinary shares are fully paid up. It has no debt financing nor does it have plans to raise debt or issue new shares capital over the three year time horizon used for business planning.

The company solvency position including the individual risks is as follows:

Solvency	Capital Requirement EUR '000	Eligible Capital EUR '000	Solvency Ratio
SCR	**26,613**	**41,967**	**158%**
MCR	**6,653**	**41,967**	**631%**

A BUSINESS and PERFORMANCE

A.1 Business

A.1.1 Name and legal form of the undertaking

Arkema Insurance dac (the "Company") is incorporated in the Republic of Ireland and is a private company limited by shares.

A.1.2 Name of the Supervisory Authority responsible for the financial supervision of the undertaking

The Company is regulated by the Central Bank of Ireland (CBI). The CBI can be contacted at: Central Bank of Ireland, PO BOX 559, New Wapping Street, North Wall Quay, Dublin 1, Ireland

A.1.3 External auditor of the undertaking

The independent auditors of the Company are:

KPMG, Chartered Accountants and Statutory Audit Firm, 1 Harbourmaster Place, I.F.S.C., Dublin 1, Ireland.

A.1.4 Holders of Qualifying Holdings in the Undertaking

The Company is wholly owned by Arkema Europe S.A., a company incorporated in France.

A.1.5 Legal Structure of the Group

Arkema Europe S.A. is owned by Arkema, the ultimate and controlling parent company which is incorporated in France.

A.1.6 Material lines of business and geographical areas

The Company is a non-life insurance captive who is licenced by the CBI to conduct non-life insurance business in classes 8, 9 & 16.

The principal activity of the Company is to undertake and carry out the business of insurance of Property Damage & Business Interruption risks of Arkema Group companies.

The material geographical areas in which the Company operates are as follows:

The European Union, Brazil, Canada, Egypt, Mexico, Switzerland, Thailand, Turkey and USA.

A.1.7 Significant Business events during the reporting period

No material events occurred during the year that would merit disclosure.

A.2 Underwriting Performance

The premium income written by the Company was derived from the coverage of the Arkema Group companies included in the group's insurance programmes.

The Company writes the following lines of business: Property Damage & Business Interruption, and for the purposes of capital reporting these are categorised as:

Class of Business as Irish GAAP	Solvency II Class of Business
Property Damage & Business Interruption	Fire and Other Damage to Property

The Company has determined that the EURO is the functional currency.

The table below shows a summary of the technical (underwriting) account for the year ended 31 December 2018 (based on Irish GAAP).

The Company earned pre-tax profits of EUR 7,471k for the year ended 31 December 2018 (2017: EUR Loss 797k). The profits have been driven by a strong underwriting performance. No dividends were paid during the year.

2018 Underwriting performance	PDBI	Total
	EUR'000	EUR'000
Gross premiums		
European Union	4,564	4,564
Located outside EU	3,056	3,056
Gross premium written	**7,620**	**7,620**
Gross premium earned	**7,620**	**7,620**
Claims paid	(2)	(2)
Claims reserves	142	142
Gross claims incurred	**140**	**140**
Underwriting Expenses	(46)	(46)
Net underwriting income	**7,714**	**7,714**

2017 Underwriting performance	PDBI	Total
	EUR'000	EUR'000
Gross premiums		
European Union	4,213	4,213
Located outside EU	2,904	2,904
Gross premium written	**7,117**	**7,117**
Gross premium earned	**7,117**	**7,117**
Claims paid	(7,638)	(7,638)
Claims reserves	255	255
Gross claims incurred	**(7,383)**	**(7,383)**
Underwriting Expenses	(174)	(174)
Net underwriting income	**(440)**	**(440)**

A.3 Investment Performance

A.3.1 Income and expenses arising by asset class

The Company's Investments are cash or cash equivalent and intercompany loan with Arkema Group. Due to the Market conditions the balance of investment income recorded in 2018 and 2017 was negative.

In EUR	2018	2017
Euro and USD call deposit	5,814,985	5,320,234
lntra-group loan (Receivable)	39,858,215	35,858,214
Intra-group loan (Payable)	(1,487,321)	(4,251,493)
Net Loan to Arkema France S.A.	38,370,894	31,606,721
Prepaid and receivable:	205,293	156,721
Total Assets:	44,391,172	37,083,676
Other Payables:	-	-
Net financial assets held to cover financial liabilities	44,391,172	37,083,676

Investment Income In EUR	2018	2017
Income from BNP funds	-	-
Income from loan to Group Undertaking	(90,833)	(63,111)
Total:	(90,833)	(63,111)

A.3.2 Gains and losses recognised directly in equity

No gains and losses have been recognised directly in equity.

A.3.3 Investments in securitisation

There are no investments in securitisation.

A.4 Performance of Other Activities

A.4.1 There have been no other significant activities undertaken by the company other than its insurance and related activities.

A.5 Any Other Information

There are no other material matters in respect of the business and performance of the Company.

B SYSTEM of GOVERNANCE

B.1 General Information on the system of governance

B.1.1 Role and responsibilities of the administrative, management or supervisory body and key Functions

The Company is classified as a Low Risk firm under the Central Bank of Ireland's risk-based framework for the supervision of regulated firms, known as PRISM or Probability Risk and Impact System and is subject to the Central Bank of Ireland's Corporate Governance Requirements for Captive Insurance and Captive Reinsurance Undertakings 2015.

Board of Directors:

The Company's Board of Directors carries responsibility for the effective, prudent and ethical oversight of the business and set it business strategy and risk appetite. The Board of Directors is also responsible for ensuring that risk and compliance are properly managed in the company.

The current composition of the Board of Directors is as follows:

Thierry Jaumain (Chairman)
Kieran McHugh
Christiane Chapuis (Resigned 31 December 2018)
Thomas Lestavel (Appointed 10 January 2019)

Independent Control Functions:

The Company has established the four key control functions in line with Solvency II requirements: risk management, actuarial, compliance and internal audit. These functions, each possessing distinct responsibilities, are tasked with providing oversight of and challenge to the business and for providing assurance to the Board in relation to the Company's control framework.

Risk Management Function

The role of the Company's risk management function is to identify and evaluate the major risks facing the Company and to facilitate the implementation of the risk management system. The Board of Directors has appointed a Chief Risk Officer to undertake this role. The roles and responsibilities of the risk management function are set out within the risk management policy.

Compliance Function

In order to effectively monitor and report on The Company's requirement to be in compliance with all applicable laws and regulatory requirements the Board of Directors has outsourced the compliance function to the Captive Manager, Marsh Management Services (Dublin) Limited ("the Manager") and an employee of the Manager has been appointed as Compliance Officer. The Compliance Officer reports to the Board.

Actuarial Function

To ensure compliance with Solvency II obligations, the role of the Head of Actuarial Function ("HoAF") is outsourced to a third party provider. The HoAF reports to the Board.

Internal Audit Function

The internal audit function is overseen by Mr. Philippe Marchal. The scope of internal audit activities includes the examination and evaluation of the effectiveness of the internal control, risk management and governance systems and processes of the entire licensed entity, including the Company's outsourced activities. The Internal Audit function reports to the Board.

B.1.2 Material changes in the system of governance that have taken place over the reporting period.

No material changes took place over the reporting period, aside from the fact that certain functions, including the actuarial function, internal audit function and risk management functions were finalised and approved by the CBI in line with Solvency II requirements.

B.1.3 Remuneration policy for the administrative, management or supervisory body and employees

B.1.3.1 Remuneration policy for the administrative, management or supervisory body and employees

The Company does not have any employees. Day to day running of the Company is handled by Marsh Management Services (Dublin) Limited under a third party administrative agreement.

Hence the Company's remuneration policy refers only to the remuneration of non-group executive directors should circumstances dictate that it is necessary to appoint external Executive Directors to the Board.

Mr. Kieran McHugh who is a non-group director and receives an annual fixed remuneration.

B.1.3.2 Material transactions during the reporting period with shareholders, with persons who exercise a significant influence on the undertaking, and with members of the administrative, management or supervisory body

As a non-life insurance captive, the principal activity of the Company is to undertake and carry out the business of insurance of Property Damage & Business Interruption risks of Arkema Group companies.

The Company did not enter into any transactions with key management personnel in the Arkema Group during the year ended 31 December 2018.

B.2 Fit and Proper requirements

B.2.1 Requirements for skills, knowledge and expertise

On 1 October 2010, Part 3 of the Central Bank Reform Act 2010 introduced a harmonised statutory system for the regulation by the CBI of persons performing Controlled Functions ('CFs') and Pre-Approval Controlled Functions ('PCFs') in regulated financial service providers.

On 1 December 2011 the CBI issued the Fitness & Probity Standards under Section 50 of the Central Bank Reform Act 2010 (the 'Code') which all persons performing Controlled Functions or Pre-Approval Controlled Functions should, at a minimum, comply with.

Guidance for (Re)Insurance Undertakings on the Fitness & Probity Amendments 2015 further assist companies in complying with their obligations brought in by the Amending Regulation S.I. 545 2015 and Solvency II (European Union (Insurance and Reinsurance) Regulations 2015 S.I. 485 of 2015).

The Company has adopted a Fitness and Probity Policy (reviewed by the Board on an annual basis) with the purpose of ensuring that:
The Company has adopted a Fitness and Probity Policy (reviewed by the Board on an annual basis) with the purpose of ensuring that:

B.2.1.1 persons holding key positions within the Company are assessed in terms of their fitness and probity in relation to a proposed role and on an ongoing basis;
B.2.1.2 effective procedures are in place to undertake this assessment;
B.2.1.3 the results of such an assessment are documented;
B.2.1.4 the Board is satisfied that it can conclude that persons holding key positions are fit and proper;
B.2.1.5 responsibility is assigned to ensure fitness and probity is monitored on a continuous basis;
B.2.1.6 approval is sought from the Central Bank of Ireland ('CBI') prior to the appointment of persons performing Pre-Approval Control Functions.

B.2.2 Process for assessing the fitness and the propriety of the persons who effectively run the undertaking or have other key functions

The Policy outlines the procedures that must be followed for assessing the fitness and probity of persons performing CFs and PCFS while also stipulating the requirements for instances when either of these functions are outsourced to a regulated or unregulated entity.

It also focuses on the documentation, controls and governance that are required to be in place to ensure compliance with the abovementioned Code and Regulations.

This is achieved in the main by means of internal checklists, documentary evidence of qualifications proving suitability for the role in question, references, regulatory authority, companies' office and police authority checks and self-certifications from the applicant in the form of Curricula Vitae and the CBI Individual Questionnaires.

B.3 Risk management system including the own risk and solvency assessment

B.3.1 Risk management system

The Company's risk management system is set out as follows:

1. The Board sets the Company Strategy.
2. The Board sets the Risk Strategy. The Risk Strategy describes and addresses the management of all material risks that the Company is exposed to in pursuit of the Company Strategy.
3. The Board sets the Risk Appetite. The Risk Appetite sets out the desired level of risk and the maximum level of variation from its risk appetite that it is willing to accept.
4. The Board has approved a Risk Policy and other individual risk policies necessary for the implementation of it Risk Strategy, consistent with its Risk Appetite.

The Company uses the Standard Formula to assess the solvency and capital requirements.

The Company performs an Own Risk and Solvency Assessment ("ORSA") at least annually. The main purpose of performing the ORSA is to ensure that the Company engages in a process of assessing all risks inherent in the business and determining the corresponding capital needs.

In order to ensure effective risk governance, the system has been designed to identify, assess, manage and monitor and report exposure to risk. This is a continuous process subject to continuous review and development.

Identify

The board reviews the risk profile of the Company at least annually and the Risk Management Function reviews the risk profile on an ongoing basis to ensure that the material risks of the Company are identified and recorded in the risk register.

Assess

Risks identified in the risk register are then quantified by the Board with input from the Risk Management Function and tolerances are established through the development of a risk appetite statement.

Manage

The Board determines the minimum standards to be maintained by the Company in order to manage the risks in a way that is consistent with its risk appetite by developing suitable individual risk policies.

Monitor/Report

Monitoring and reporting to the Board is undertaken at least quarterly from a number of sources including the Risk Management Function, Compliance Officer and the Internal Audit Function.

Findings from the development of the risk register are considered by the Board in the preparation of the annual internal audit plans.

B.3.2 Implementation of the Risk management system

The Company recognises the need to have appropriate governance, monitoring and reporting processes and procedures which enable the Company to identify, assess, manage, monitor and report the risks it is or might be exposed to.

Responsibility for risk management is spread throughout the Company and the wider Arkema group. Appropriate internal reporting procedures and feedback loops ensure that information on the risk management framework is actively monitored and managed by all relevant functions and the Board.

The Company adopts a "3 lines of defence" approach for the overall governance of its risk management system.

The Board of Directors is ultimately responsible for the risk management framework and internal control, including approval of the Company strategy and business planning.

1st Line of Defence – Day to Day:

Operations – Captive Manager: The Captive Manager provides day to day operations, accounting, financial reporting and administrative support services and company secretarial and regulatory reporting services on an outsourced basis to the Company.

2nd Line of Defence – Oversight:

Risk Management Function ("RMF"): The RMF is responsible for the oversight of the ongoing development, implementation and operation of the risk management framework, strategy, related resource plan and making recommendations to the Board thereon.

Compliance Function: The Compliance Function is recognised as a key part of the Company's internal control system which should identify, assess, monitor and report on the compliance risk exposure of the Company. The Compliance Function also shares its responsibilities with other Company Functions which are responsible for their specific areas.

In order to help achieve its compliance objective the Board has appointed a Compliance Officer. The role of the Compliance Officer is set out in the Company's Board approved Compliance Policy.

3rd Line of Defence – Independent Assessment:

Internal Audit Function: The Board has established an Internal Audit Function that is an independent function within the Company with a remit to examine and evaluate the functioning, effectiveness and efficiency of the internal control system and other elements of the system of governance of the Company.

The responsibilities of the Internal Audit function are set out in the Company's Board approved Internal Audit Policy. The Internal Audit Function reports to the Board.

Actuarial Function: The role of the Actuarial Function is outsourced to third party provider via the terms of a written SLA.

B.3.3 ORSA

B.3.3.1 ORSA process

The Company prepares an ORSA on an annual basis and on an ad-hoc basis, if circumstances materially change. The objective of the ORSA process is to enable the Board to assess its capital adequacy in light of the assessments of its risks and the potential impacts of its risk environment, and to enable the Company to make appropriate strategic decisions.

The ORSA process is a rolling project plan of how the ORSA is completed, the interaction and contributions from different stakeholders, the process timetable, the audit trail and the monitoring and reporting cycle.

The Company has adopted the following approach for the conduction of the ORSA process:

Risk Management System: Board puts in place an effective risk management framework comprising of strategies, tolerances, policies, governance, monitoring and reporting procedures necessary to identify, measure, monitor, manage and report, on a continuous basis, the risks to which the company is or could be exposed in pursuing its Company strategy.

Risk Identification: Board initiates an organised identification of all actual risks as well as emerging risks, taking into account the Company's strategy and business planning horizon.

Risk Appetite: Appetites and tolerance limits for the risks identified are set by the Boards, which provide a basis for allocating risk capacity against the Company's exposure to particular risk categories.

Current Business Activities, Risk Profile, Capital and Solvency: Analysis of the current business activities, risk profile (quantitative and qualitative), calculation and analysis of regulatory and economic capital, analysis of solvency margin cover and description and assessment of risk mitigation techniques.

Forecast Business Activities, Risk Profile, Capital and Solvency: Analysis of the forecast business activities, risk profile (quantitative and qualitative), calculation and analysis of regulatory and economic capital, analysis of solvency margin cover and description and assessment of risk mitigation techniques.

Stress and Scenario Analysis: Board assesses the effect of different stresses (including reverse stress testing) and scenarios.

Impact on Strategy: Output of the ORSA process is reviewed and challenged by the Board and is being continuously embedded into the Company strategy and system of governance.

The Board requires that the ORSA process produces meaningful reports on the adequacy of the Company's capital and that it includes risk sensitivities that can be used in shaping strategy and risk appetite.

The Board reviews the ORSA report and considers appropriate action for the business such as:

- Decisions in relation to capital;
- Reassessment of risk profile and appetite;
- Additional risk mitigation actions;
- Reassessment of investment strategy.

B.3.3.2 ORSA review and approval process

The risk management process and ORSA is performed on an annual basis, after the SCR calculation or when there is a significant shift in The Company's business plan. The risk monitoring is performed on an on-going basis and the Risk Register is annually reviewed and updated during the ORSA review process.

Under the following circumstances, a non-scheduled ORSA shall be performed immediately (in addition to the scheduled ORSA):

- Significant change in the risk profile of the Company which can be defined as a major change to the business strategy/business activity/insurance program etc. (i.e. business activities other than the Company's current underwriting activity)
- Significant changes to Non-Financial matters - Operational/Regulatory and Legal/Strategic/Group Risks.
- Significant changes in Other categories - Capital Shortage Risks/quality of capital etc.

B.3.3.3 Statement explaining how the undertaking has determined its own solvency needs given its risk profile and how its capital management activities and its risk management system interact with each other.

The Company determines the solvency capital and assesses the overall solvency needs using the Solvency II standard formula.

A three year base case projection of the Solvency II Balance Sheets and Solvency Capital Requirements position is produced using the standard formula, as well as actuarial assumptions. The results are subjected to a range of scenario testing that is reviewed by management and challenged by the Board and, where appropriate, potential management actions are noted and conclusions drawn

The Company has sufficient capital to meet its base case SCR for its current and projected business activities over the 3 year business planning horizon.

The results of the ORSA show that the Company has sufficient eligible capital own funds to:

- Maintain a comfortable margin over its Overall Solvency Needs for its current and projected business activities over the business planning horizon;
- Continue to meet internal and regulatory solvency targets for capital management;
- Continue its business on a going concern basis over the business planning horizon.

B.4 Internal Control System

B.4.1 Description of the internal control system

The Board of Directors is ultimately responsible for the internal control framework, including approval of the Company strategy and business planning. Board level controls include the Board charter, Company policies, reports and minutes of Board meetings.

The Internal Control Framework of the Company has three other elements, as previously detailed in section B3.2:

First line of defence: "Day to day" operations and associated controls/
Second Line of defence: oversight from Compliance, Risk Management functions
3rd Line of Defence – Independent Assessment, internal audit and actuarial functions (and also external audit).

B.4.2 Implementation of the compliance function

The Board of the Company has ultimate responsibility for its compliance objective.

To help achieve this aim the Board has established a Compliance Function, staffed by an appointed Compliance Officer, to supplement not supplant, the responsibilities of the Board to ensure compliance with legislation and applicable requirements.

The role of the Board appointed Compliance Officer is to:

- assist the Board with ensuring ongoing compliance with legislation and applicable requirements;
- enhancing the Company's awareness of compliance matters;
- monitor the Company's compliance with (re)insurance legislation and applicable requirements and guidelines;
- document any breaches identified, how they were addressed and whether any third party reporting of the breach is required;
- ensure that the Board is kept informed of any amendment to the applicable regulations, legislation and guidelines or the addition of any new requirements and the potential impact on the Company;
- provide opinions, recommendations, supervision and independent controls;
- provide reasonable assessment of the effectiveness and consistency of the internal processes used to control the compliance of the Company's operations and protect its reputation.

The intended compliance activities are set out in an annual compliance plan prepared by the Compliance Officer which is reviewed and approved by the Board.

The Compliance Officer presents a Compliance Officer report to the Board at each board meeting which outlines the following:

- Details of regulatory correspondence with the Company
- Details of regulatory developments
- Details of which controls were tested since the last report and the results of the tests
- Conclusions and recommendations on the Company's compliance with reinsurance legislation and guidelines.

B.5 Internal audit function

B.5.1 Implementation of the internal audit function

The Company has appointed Mr. Philippe Marchal as Head of its Internal Audit Function. The internal audit function possesses a remit to examine and evaluate the functioning, effectiveness and efficiency of the internal control system and all other elements of the system of governance.

To this end, the Internal Audit Function is mandated to:

- establish, implement and maintain an audit plan setting out the audit work to be undertaken in the upcoming years, taking into account all activities and the complete system of governance of the Company;
- take a risk-based approach in deciding its priorities;
- report the audit plan to Board of Directors;
- issue recommendations based on the result of work carried out in accordance with the audit plan and submit a written report on its findings and recommendations to the Board of Directors on at least an annual basis.

B.5.2 Independence of the internal audit function

The function provides independent and objective assurance services. As an independent the internal audit function does not hold any executive responsibilities or any accountability for risk management or systems of internal control other than to appraise their effectiveness.

B.6 Actuarial function

The role of the Actuarial Function is outsourced to third party provider, Marsh France SAS, via the terms of a written SLA

The key role of the Head of Actuarial Function (HoAF) is to provide the following services:

- Opinion on Underwriting Policy
- Opinion on Technical Provisions
- Opinion on Reinsurance Arrangements
- Contribution to the Risk Management System
- Contribution to calculation of capital requirements
- Opinion on the ORSA process

B.7 Outsourcing

The Company has established an Outsourcing Policy which sets out the requirements for identifying, justifying and implementing material outsourcing arrangements. This Policy has been adopted by the Company and includes following:

- Definition of outsourcing and critical outsourcing;
- Risk Mitigation strategies;
- Board and Management responsibility;
- Due Diligence;
- Business Continuity Management (BCM);
- Contractual Arrangements;
- Management and control of the Outsourcing Relationship;
- Intra-Group Outsourcing;
- Final approval

The Company's outsourcing arrangements are subject to annual review and the findings of the report, along with the Outsourcing Policy are reviewed by the Board.

The following is a list of the important outsourced operational functions together with the jurisdiction in which the service providers of such functions or activities are located:

Outsourced Provider	Service Outsourced	Internal / External	Jurisdiction	Outsourcing Manager
MARSH SAS	All range of brokerage services	External	France	Chairman of the BoD, Chief Underwriting Officer
Marsh Management Services (Dublin) Ltd	Accounting, Administration Compliance	External	Ireland	Chairman of the BoD,
Marsh France	Actuary Services, Actuary key function	External	France	Chairman of the BoD, Chief Risk Officer
Sovos Fiscal Reps Ltd	IPT Services	External	UK	Chairman of the BoD
ARKEMA France	Internal audit supporting services	Internal	France	Chairman of the BoD, Chief Risk Officer
KPMG	External Auditor	External	Ireland	Chairman of the BoD

B.8 Assessment of the adequacy of the system of governance of the insurance or reinsurance undertaking to the nature, scale and complexity of the risks

The Company has assessed its corporate governance system and has concluded that it effectively provides for the sound and prudent management of the business, which is proportionate to the nature, scale and complexity of operations of the Company.

B.9 Any other material information regarding the system of governance of the Company

No material changes regarding the system of governance of the Company took place, aside from the fact that certain committees which were not mandatory or required were resigned during 2018. These committees were Risk, Underwriting, Finance, Investment and AML.

C RISK PROFILE

C.1 Underwriting risk

C.1.1 Key underwriting risks

Underwriting risk at 31 December 2018 comprises 66% of the undiversified basic SCR.

The principal risks facing the company relate to losses arising on insurance and reinsurance business written in respect of insured risks incurred by group companies. The overall risk under the PDBI program is mitigated by a per occurrence limit of €20m and an annual aggregate of €24m.

The key underwriting risks to which the Company is exposed to are set out below:

Non-life premium and reserve risk

The Company accepts insurance risk through its insurance contracts where it assumes the risk of loss from organisations that are directly subject to the underlying loss.
Underwriting risk arises from two sources – premium risk (pricing) and adverse claims development (reserve risk).

For a non-life insurer, underwriting risk is the risk arising from non-life insurance obligations in relation to the perils covered and the processes used in the conduct of business.

There are a number of material risks that are considered as a result of the Company's insurance underwriting. For premium risk, the Company has considered the risk of under-pricing of premiums resulting in higher loss ratios than expected. For reserve risk, the Company has considered the risk of over and under reserving of actual and expected claims.

Non-life catastrophe risk

The risk of a major natural or man-made event occurring.

C.1.2 Assessment and risk mitigation techniques used for underwriting risks

The Company monitors and controls risks via various methods, including:

- Assessing insurance risks with quality underwriting and claims expertise and information;
- Diversifying and limiting reinsurance and investment risk through ongoing review and management;
- Pricing is derived from actuarially projected losses;
- Retaining risk within an approved risk appetite and solvency requirements;
- Closely monitoring claims to ensure that potential funding issues for large losses are identified at an early stage;
- Reviewing the reinsurance strategy on a regular basis;
- The ORSA includes stress and scenario testing which is used to assess the risks under stressed conditions;
- Independent opinions on the reasonableness and adequacy of the overall underwriting policy, technical provisions and reinsurance arrangements are provided by the Head of Actuarial Function on an annual basis.

C.2 Market risk

C.2.1 Material market risks

Market risk is the risk arising from the level of volatility of market prices of financial instruments. Exposure to market risk is measured by the impact of movements in the level of financial variables such as stock prices, interest rates, real estate prices and exchange rates. Market risk is arrived at using the assumptions and calculations methods contained in the Standard Formula.

Investment objectives are outlined in the Company's Investment Policy.

The table below outlines the material components of the market risk module as at 31 December 2018.

Market Risk sub-module	EUR'000
Concentration	10,600
Spread	996
Interest Rate	202
FX	731

Concentration Risk: the risk that excessive exposure to counterparty will impact on the solvency of Company.

Concentration risk is the most significant market risk charge and arises from the significant intercompany balance held with Arkema France S.A.

Spread Risk: the sensitivity of the value of investments, primarily bonds and deposits in respect of the Company, to changes in the level or in the volatility of credit spreads.

Spread risk is linked to the credit rating of assets held and the effect of a market change in the credit curve and is not considered to be material given the nature and structure of the Company's investments.

Interest rate risk: the risk that the Company is exposed to lower returns or loss as a direct or indirect result of fluctuations in the value of, or income from, specific assets arising from changes in underlying interest rates.

Interest rate risk is minimal as assets are in general short term in nature.

Currency risk: the risk that the Company is exposed to higher or lower returns as a direct or indirect result of fluctuations in the value of, or income from, specific assets or liabilities arising from changes in underlying exchange rates.

The Company issues some premiums in USD as well as Euro. The Company also holds a USD Call deposit of US$5m offset by a negative USD I/Co balance of US$1.7m. Although not considered material, the Company has considered it prudent to include currency risk in its allocation of capital.

C.2.2 Material risk concentrations

There is a concentration of risks owing to the value of assets invested in the intercompany balance held with Arkema France S.A.. However, this is a risk that is managed by the Company through its investment policy.

C.2.3 Prudent person principle applied to market risks

The high quality and conservative investments are a consequence of the investment assets being prudently invested, taking into account the liquidity requirements of the business and the nature and timing of the insurance liabilities.

C.2.4 Assessment and risk mitigation techniques used for market risks

The Company monitors and controls risks via various methods, including:

- Compliance with the investment policy as approved by the Company's Board of Directors;
- Investment strategy is reviewed on an annual basis;
- Investment performance is reviewed on a monthly basis as part of the financial reporting process;
- Retaining risk within an approved risk appetite and solvency requirements;
- Monitoring changing environment and market conditions that affect risk;
- Diversifying and limiting investment risk through ongoing review;
- The ORSA includes stress and scenario testing which is used to assess the risks under stressed conditions.

C.3 Credit risk

C.3.1 Material market risks

Credit risk at 31 December 2018 comprises 18% of the undiversified basic SCR.

Credit risk is the risk that the Company is exposed to lower returns or loss if another party fails to perform its financial obligations towards the Company.

The counterparty default risk module in the Standard Formula is mainly driven by cash at bank and the best estimate reinsurer's share of technical provisions.

Credit risk is considered to be low in that the Company does not expect any counterparty to fail to meet its obligations. The Company is potentially exposed to a very low credit risk as described in A.3, being the intercompany loan with the parent company and the cash domiciled at BNP PARIBAS, its Irish subsidiary: the A -1 (short term) rating granted by S & P demonstrates the financial solidity of the bank.

C.3.2 Material risk concentrations

There is a concentration of risks owing to the value of assets invested in the intercompany balance held with Arkema France S.A.. However, this is a risk that is managed by the Company through its investment policy.

C.3.3 Prudent person principle applied to credit risks

Counterparties are selected by taking into account the credit rating and reputation of each entity. Credit ratings are used as a way of properly identifying and managing the risk attached to a counterparty.

C.3.4 Assessment and risk mitigation techniques used for credit risks

The Company monitors and controls risks via various methods, including:

- The Board is responsible for monitoring the on-going suitability of the chosen banking institutions to ensure they are in line with Arkema Group requirements, including applicable ratings;
- Continuous monitoring of large claims by Risk Management and the Board of Directors;.
- Retaining risk within an approved risk appetite and solvency requirements.

C.4 Liquidity risk

C.4.1 Material liquidity risks

Liquidity risk refers to the risk that undertakings are unable to realise investments and other assets in order to settle their financial obligations when they fall due.

It is the Company's policy that liquidity and concentration risk is minimised as much as possible

The Company has considered the risk of a lack of liquidity available to pay claimants and has determined that no specific allocation of capital is considered necessary for this risk. The Board considers that this risk is covered through its specified strategic solvency target.

The Company's cash in-flow is generated from premium income. Its cash out-flow consists mainly of claims payments with a small volume of administration expenses

C.4.2 Prudent person principle applied to liquidity risks

The investment assets are prudently invested taking into account the liquidity requirements of the business and the nature and timing of the insurance liabilities.

C.4.3 Assessment and risk mitigation techniques used for liquidity risks

The Company monitors and controls risks via various methods, including:

- Compliance with the Liquidity and Concentration Policy as approved by the Company's Board of Directors;
- Retaining risk within an approved risk appetite and solvency requirements;
- Premiums are billed on an annual basis. Upon receipt of premium, investments are made in line with the Company's Investment and Asset Liability Policy;
- Outstanding premiums are actively monitored and followed up. The timely collection of these premiums and the short term nature of the investments ensure that adequate funds are available to meet claim and administration payments as they become due;

C.5 Operational risk

C.5.1 Material operational risks

Operational risk is the risk of loss resulting from failed internal processes, people and systems or from external events. Operational risks which can result in losses include internal fraud. External fraud, employments practices, system failures and disregard of company policies.

The Company has considered a number of operational risks in its risk register arising out of its activities. For example, the Company has considered the risk of fraud arising from the misappropriation of Company funds

Operational risks are addressed in the capital requirement as an addition to the BSCR to the extent that they have not been explicitly covered in other risk modules. The operational risk capital charge as at 31 December 2018 is EUR228,587.

C.5.2 Assessment and risk mitigation techniques used for operational risks

The Company monitors and controls risks via various methods, including:

- Identifying and analysing risk through a disciplined risk assessment process;
- Mitigating or avoiding risks that do not fit within the Company's business objectives;
- Retaining risk within an approved risk appetite and solvency requirements;
- Monitoring and internal reporting;
- Commitment of effective corporate governance.

C.6 Other material risks

The Company has included a range of non-quantifiable risks in its ORSA process. Documented associated actions exist for each of these risks and they are reviewed on a quarterly basis by the Board of Directors.

Sample risks include:

- Human error;
- Regulatory and Compliance.

The Board considers that these non-quantifiable risks that are not captured by the standard model are covered by the application of a specified strategic solvency target.

C.7 Amount of expected profit included in future premiums as calculated in accordance with Article 260(2)

Since the Company are not expected to receive any future premium, both their technical provision calculations will be the same, and hence the expected profit will be zero.

C.8 Stress and sensitivity tests

The Company's ORSA contains three scenarios and a reverse stress test, which reflect stresses on market risk (failure of a financial institution), underwriting risk (impact of a €13m catastrophic loss on the Property programme), underwriting risk (impact of a catastrophic loss on the Property programme where the aggregate of €24m is reached).

The Company also considered reverse stress test. This can be defined as a stress test that requires assessment of scenarios and circumstances that would render its current business model or risk mitigation plan unviable, thereby identifying potential business vulnerabilities.

The results of the stress testing evidence that the Company is well capitalised at present and that no further general management actions are required outside of the existing reporting and monitoring controls are in place.

C.9 Any Other Information

The Company has identified all material risks through its risk register and there is no other material information regarding the risk profile of the Company that warrants disclosure.

D VALUATION for SOLVENCY PURPOSES

D.1 Assets

D.1.1-2 Local GAAP and Solvency II Valuations

The table below sets out the value of the Company's material assets as at 31 December 2018:

	31/12/2018		31/12/2017	
	Assets per GAAP	Assets per Solvency II	Assets per GAAP	Assets per Solvency II
	Total EUR'000	Total EUR'000	Total EUR'000	Total EUR'000
Cash at bank	5,815	5,815	5,320	5,320
Intercompany deposit	39,858	39,858	35,858	35,858
Total material assets	**45,673**	**45,673**	**41,178**	**41,178**

The Company's assets are recognised and valued using the following principles:

Cash at bank

Call account deposits held with an 'A' rated third party credit institution. These investments are recorded at fair value.

Intercompany deposit

Valued at the amount held at amotised cost which equates to fair value, Interest is accrued on a monthly basis. Terms and conditions of the loan facility are based on an intercompany agreement with Arkema France SA.

D.2 Technical Provisions

D.2.1 Local GAAP and Solvency II Valuations

The valuation of liabilities for Solvency II has been determined in accordance with Articles 75 to 86 of the Solvency II Directive 2009/138/EC and related guidance.

The table below shows an analysis of the technical provisions as at 31 December 2018:

Insurance Class	31/12/2018		31/12/2017	
	TPs per GAAP	TPs per Solvency II	TPs per GAAP	TPs per Solvency II
	EUR'000	EUR'000	EUR'000	EUR'000
Fire and damage to Property				
Best estimate of liabilities (BEL)	3,354	(352)	3,496	3,880

Risk margin	-	1,704	-	1,952
Total technical provisions	**3,354**	1,352	**3,496**	5,832

The GAAP accounts of the Company include provisions for claims incurred and claims incurred but not reported, which consider all reasonably foreseeable best estimates. An unearned premium reserve is also included, relating to gross premiums written that have not yet expired by the end of the financial period by reference to the full term of the insurance policies to which such premiums written relate.

A number of adjustments were made to the GAAP provisions in order to obtain the Solvency II technical provisions. Key points to note are as follows:

The Solvency II technical provisions comprise the following:

- Undiscounted claims provision
- Undiscounted premium provision
- Premium receivables in respect of unbound premiums at the balance sheet date
- Expenses
- Events not in Data
- Discounting
- Risk margin

Calculation basis was as follows:

- The claims provisions are based on actuarial best estimates.
- There is an allowance for premium receivables within the premium provision in line with policy period thresholds and premiums falling due.
- The expected losses for the premium provision are calculated by applying a loss ratio to the unearned premium.
- Allocated expenses are allowed for implicitly within the best estimate reserves.
- ENID ("Events not in Data – allowance for possible events that have not historically occurred, but could impact the claims experience) loadings are considered to be implicitly included in the best estimate reserves.
- All elements of the technical provisions are discounted at the risk free rates published by EIOPA to give present values.

Solvency II classes of business: Classes of business have been allocated to Solvency II line of business on the following basis:

Class of Business as per license	Solvency II Class of Business
Property Damage & Business Interruption	Fire and Other Damage to Property

Inclusion of unearned business: The expected claims on unearned business have been calculated using an expected loss ratio applied to the gross of reinsurance unearned premium reserve.

Risk Margin

The risk margin has been calculated separately by determining the cost of providing an amount of eligible own funds equal to the Solvency Capital Requirement necessary to support the insurance and reinsurance obligations

The annual cost of capital is taken to be 6% of the capital estimated at each future point, discounted to the valuation date using the same risk free yield curve as that used to determine

the best estimate technical provisions (calculated on each Solvency II Line of Business)..

D.2.2 Uncertainty associated with the value of Technical Provisions

All estimates of unpaid loss reserves are inherently uncertain. The key areas of uncertainty of the technical provisions are driven by the uncertainty of the underlying booked reserves. Hence, the key area of particular uncertainty relating to the Company's liabilities relates to the potential for volatility in claims experience in the future that is not reflected in estimates of ultimate claims produced using actuarial methods. This arises as the ultimate liability for claims is subject to the outcome of events yet to occur, including changes in the attitudes of courts and claimants towards the settlement of claims. Techniques and assumptions have been employed in estimating claims which are expected to be appropriate, but it should be recognised that future loss emergence may deviate, perhaps materially from claim estimates.

D.2.3 Solvency II and local GAAP valuation differences of Technical Provisions by material line of business

See Section D2.1.

D.2.4 The Company does not apply the matching adjustment referred to in Article 77b of Directive 2009/138/EC.

D.2.5 The Company does not use the volatility adjustment referred to in Article 77d of Directive 2009/138/EC.

D.2.6 The Company does not apply the transitional risk-free interest rate-term structure referred to Article 308c of Directive 2009/138/EC.

D.2.7 The Company does not apply the transitional deduction referred to in Article 308d of Directive 2009/138/EC.

D.2.8 Recoverables from reinsurance and special purpose vehicles

There were no recoverables or special purpose vehicles as at 31 December 2018 (2017 EUR Nil).

D.2.9 Material changes in relevant assumptions made in the calculation of technical provisions

There are no material changes in the relevant assumptions made in the calculation of the technical provisions compared to the previous reporting period ("Day 1" Solvency II reporting).

D.3 Other liabilities

Other liabilities at 31 December 2018 were EUR2,560k (2017: EUR4,411k) and are composed of accrued expenses, amounts due to group undertakings, corporation tax payable and creditors arising out of reinsurance operations.

These Liabilities are valued in accordance with Irish GAAP; there are no differences between the Local GAAP and Solvency II valuations.

D.4 Alternative Methods for Valuation for other liabilities

The Company does not use any alternative methods for valuation.

D.5 Any Other Information

There are no other material matters in respect of the valuation of assets and liabilities.

E CAPITAL MANAGEMENT

E.1 Own funds

E.1.1 Objective, policies and processes for managing own funds

The objective of own funds management is to maintain, at all times, sufficient own funds to cover the SCR and MCR with an appropriate buffer. As part of own funds management, the Company prepares ongoing annual solvency projections and reviews the structure of own funds and future requirements. The business plan, which forms the basis of the ORSA contains a three year projection of funding requirements and helps focus actions for future funding.

The Company is a single shareholder entity whose ordinary shares are fully paid up. It has no debt financing nor does it have plans to raise debt or issue new shares capital over the three year time horizon used for business planning.

The medium-term capital management plan set by the Board is as follows:

- Own funds to be maintained at an agreed level in excess of the SCR, target solvency margin cover is currently set at 120% of the SCR;
- Dividends will not be paid or will be deferred if doing so would cause the Company to breach its legal and regulatory requirements or fall below the abovementioned target SCR cover;
- The Company's own funds are primarily invested in in cash or cash equivalents and in an intercompany loan via the terms of a credit agreement in line with the Board approved Investment Policy.

E.1.2 Own funds analysed by tiers

An analysis of own funds is shown below:

Date	Description	Tier 1 EUR'000	Tier 3 EUR'000	Total EUR'000
1 January 2018	Opening balance comprising: Ordinary share capital Reconciliation reserve(Comprising retained earnings and Solvency II adjustments)	 8,500 22,592		 **8,500** **22,592**
	Movement in the Reconciliation reserve for the year ended 31 December 2018	10,875		**10,875**
31 December 2018	Closing balance	41,967		**41,967**
	Represented by:			
	Ordinary share capital	8,500		**8,500**
	Deferred Tax Asset			
	Reconciliation reserve (Comprising retained earnings and Solvency II adjustments)	33,467		**33,467**
	Total Basic own funds after deductions	41,967		**41,967**

The Company's ordinary share capital and reconciliation reserve are all available as tier 1 unrestricted own funds as per Article 69 (a) (1) of the Delegated Regulation. The positive reconciliation reserve equals the excess of assets over liabilities less other basic own fund items, as at the reporting date. There are no foreseeable dividends or own shares held.

The Company has no tier 1 restricted own funds and no tier 2 or tier 3 own funds.

E.1.3 Eligible amount of own funds to cover the Solvency Capital Requirement, classified by tiers

The eligible amount of own funds to cover the Solvency Capital Requirement is EUR41.97m. This is completely comprised of Tier 1 unrestricted Basic Own Funds of EUR41.97m.

E.1.4 Eligible amount of own funds to cover the Minimum Capital Requirement, classified by tiers

The eligible amount of own funds to cover the Minimum Capital Requirement is EUR41.97m. This is completely comprised of Tier 1 unrestricted Basic Own Funds of EUR41.97m.

E.1.5 Difference between equity as shown in the financial statements and the Solvency II value excess of assets over liabilities

Reconciliation of Basic Own Funds to Equity as per financial statements as at 31 December 2018	
	EUR'000
Solvency II - Basic Own Funds	41,967
Total Equity as per financial statements	39,965
Difference:	**2,002**
Represented by:	
Difference between Net Technical Provisions and BEL	3,706
Risk Margin	(1,704)
Difference:	**2,002**

E.1.6 None of the Company's own funds are subject to the transitional arrangements referred to in Articles 308b(9) and 308b(10) of Directive 2009/138/EC.

E.1.7 There are no ancillary own funds items.

E.1.8 No deductions are applied to own funds and there are no material restrictions affecting their availability and transferability.

E.2 Solvency Capital Requirement and Minimum Capital Requirement

E.2.1 Amount of Solvency Capital Requirement and Minimum Capital Requirement

The table below shows the total SCR and MCR at 31 December 2018:

	EUR'000
SCR	26,613
MCR	6,653

The final amount of the SCR remains subject to supervisory assessment.

E.2.2 Solvency Capital Requirement split by risk modules

The table below shows the SCR components by risk module (using the Standard Formula) at 31 December 2018.

SCR OVERVIEW	EUR '000
Market Risk	10,694
Counterparty default risk	414
Non-life underwriting risk	21,361
Diversification	(6,085)
Basic Solvency Capital Requirement	26,384
Operational Risk	229
Solvency Capital Requirement	26,613

E.2.3 Simplified calculations are not used for any of the risk modules or sub-modules.

E.2.4 The Company does not use undertaking specific parameters in its computation.

E.2.5 The Minimum Capital Requirement is calculated using the Standard Formula specifications.

The table below shows the inputs into the MCR calculation as at 31 December 2018.

MCR Overview	EUR '000
Linear MCR	571
SCR	26,613
MCR Cap	11,976
MCR Floor	6,653
Combined MCR	6,653
Absolute Floor of the MCR	2,500
Minimum Capital Requirement	6,653

E.2.6 There were no material changes to the Solvency Capital Requirement and to the Minimum Capital Requirement over the reporting period.

E.3 Any use of the equity risk sub-module in the calculation of the Solvency Capital Requirement.

The Company has not opted to use the duration-based equity risk sub-module set out in Article 304 of Directive 2009/138/EC.

E.4 Internal model information.

The Company applies the Standard Formula model and does not use an internal model to calculate the Solvency Capital Requirement.

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

There were no breaches of the Solvency Capital Requirement (and hence the Minimum Capital Requirement) over the reporting period.

E.6 Any other information.

There are no other material matters in respect of the valuation of capital management.

E TEMPLATES

The following QRTs are required for the SFCR.

QRT ref	QRT Template name
S.02.01	Balance Sheet
S.05.01	Premiums, claims and expenses
S.05.02	Premiums, claims and expenses by country
S.17.01	Technical Provisions
S.19.01	Non-Life insurance claims
S.23.01	Own Funds
S.25.01	Solvency Capital Requirement – for undertakings on Standard Formula
S.28.01	Minimum Capital Requirement

The templates are included at the end of the report.

Annex I
S.02.01.02
Balance sheet
(Reported in EUR 000's)

		Solvency II value
Assets		**C0010**
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**	
Investments (other than assets held for index-linked and unit-linked contracts)	**R0070**	
Property (other than for own use)	**R0080**	
Holdings in related undertakings, including participations	**R0090**	
Equities	**R0100**	
Equities - listed	**R0110**	
Equities - unlisted	**R0120**	
Bonds	**R0130**	
Government Bonds	**R0140**	
Corporate Bonds	**R0150**	
Structured notes	**R0160**	
Collateralised securities	**R0170**	
Collective Investments Undertakings	**R0180**	
Derivatives	**R0190**	
Deposits other than cash equivalents	**R0200**	
Other investments	**R0210**	
Assets held for index-linked and unit-linked contracts	**R0220**	
Loans and mortgages	**R0230**	39,858
Loans on policies	**R0240**	
Loans and mortgages to individuals	**R0250**	
Other loans and mortgages	**R0260**	39,858
Reinsurance recoverables from:	**R0270**	
Non-life and health similar to non-life	**R0280**	
Non-life excluding health	**R0290**	
Health similar to non-life	**R0300**	
Life and health similar to life, excluding health and index-linked and unit-linked	**R0310**	
Health similar to life	**R0320**	
Life excluding health and index-linked and unit-linked	**R0330**	
Life index-linked and unit-linked	**R0340**	
Deposits to cedants	**R0350**	
Insurance and intermediaries receivables	**R0360**	58
Reinsurance receivables	**R0370**	
Receivables (trade, not insurance)	**R0380**	
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**	5,815
Any other assets, not elsewhere shown	**R0420**	147
Total assets	**R0500**	45,878

Annex I
S.02.01.02
Balance sheet
(Reported in EUR 000's)

		Solvency II value
Liabilities		**C0010**
Technical provisions – non-life	**R0510**	1,352
Technical provisions – non-life (excluding health)	**R0520**	1,352
Technical provisions calculated as a whole	**R0530**	
Best Estimate	**R0540**	-352
Risk margin	**R0550**	1,704
Technical provisions - health (similar to non-life)	**R0560**	
Technical provisions calculated as a whole	**R0570**	
Best Estimate	**R0580**	
Risk margin	**R0590**	
Technical provisions - life (excluding index-linked and unit-linked)	**R0600**	
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**	
Technical provisions calculated as a whole	**R0660**	
Best Estimate	**R0670**	
Risk margin	**R0680**	
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**	
Insurance & intermediaries payables	**R0820**	30
Reinsurance payables	**R0830**	
Payables (trade, not insurance)	**R0840**	
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**	2,529
Total liabilities	**R0900**	3,911
Excess of assets over liabilities	**R1000**	41,967

Annex I

S.05.01.02

Premiums, claims and expenses by line of business
(Reported in EUR 000's)

		Line of Business for: **non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)**								
		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
		C0010	**C0020**	**C0030**	**C0040**	**C0050**	**C0060**	**C0070**	**C0080**	**C0090**
Premiums written										
Gross - Direct Business	**R0110**							4,564		
Gross - Proportional reinsurance accepted	**R0120**							3,056		
Gross - Non-proportional reinsurance accepted	**R0130**									
Reinsurers' share	**R0140**									
Net	**R0200**							7,620		
Premiums earned										
Gross - Direct Business	**R0210**							4,564		
Gross - Proportional reinsurance accepted	**R0220**							3,056		
Gross - Non-proportional reinsurance accepted	**R0230**									
Reinsurers' share	**R0240**									
Net	**R0300**							7,620		
Claims incurred										
Gross - Direct Business	**R0310**							(94)		
Gross - Proportional reinsurance accepted	**R0320**									
Gross - Non-proportional reinsurance accepted	**R0330**									
Reinsurers' share	**R0340**									
Net	**R0400**							(94)		
Changes in other technical provisions										
Gross - Direct Business	**R0410**									
Gross - Proportional reinsurance accepted	**R0420**									
Gross - Non- proportional reinsurance accepted	**R0430**									
Reinsurers'share	**R0440**									
Net	**R0500**									
Expenses incurred	**R0550**							309		
Other expenses	**R1200**									
Total expenses	**R1300**									

Annex I
S.05.01.02
Premiums, claims and expenses by line of business

		Line of Business for: **non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)**			Line of business for: **accepted non-proportional reinsurance**				Total
		Legal expenses insurance	Assistance	Miscellaneous financial loss	Health	Casualty	Marine, aviation, transport	Property	
		C0100	**C0110**	**C0120**	**C0130**	**C0140**	**C0150**	**C0160**	**C0200**
Premiums written									
Gross - Direct Business	**R0110**								4,564
Gross - Proportional reinsurance accepted	**R0120**								3,056
Gross - Non-proportional reinsurance accepted	**R0130**								
Reinsurers' share	**R0140**								-
Net	**R0200**								7,620
Premiums earned									
Gross - Direct Business	**R0210**								4,564
Gross - Proportional reinsurance accepted	**R0220**								3,056
Gross - Non-proportional reinsurance accepted	**R0230**								
Reinsurers' share	**R0240**								-
Net	**R0300**								7,620
Claims incurred									
Gross - Direct Business	**R0310**								(94)
Gross - Proportional reinsurance accepted	**R0320**								
Gross - Non-proportional reinsurance accepted	**R0330**								
Reinsurers' share	**R0340**								-
Net	**R0400**								(94)
Changes in other technical provisions									
Gross - Direct Business	**R0410**								
Gross - Proportional reinsurance accepted	**R0420**								
Gross - Non- proportional reinsurance accepted	**R0430**								
Reinsurers'share	**R0440**								
Net	**R0500**								
Expenses incurred	**R0550**								309
Other expenses	**R1200**								-
Total expenses	**R1300**								309

Annex I
S.05.01.02
Non-life premiums, claims and expenses by country (Top 5 and home country)
(Reported in EUR 000's)

			Home country	Top 5 countries (by amount of gross premium written) - non-life obligations					Total Top 5 and home country
			Ireland	**France**	**Germany**	**Italy**	**Netherlands**	**United States of America**	
Premiums written	Gross - Direct Business	R0110	4	3,426	221	423	228		**4,302**
	Gross - Proportional reinsurance accepted	R0120						2,885	**2,885**
	Gross - Non-proportional reinsurance accepted	R0130							
	Reinsurers' share	R0140							**0**
	Net	R0200	4	3,426	221	423	228	2,885	**7,187**
Premiums earned	Gross - Direct Business	R0210	4	3,426	221	423	228		**4,302**
	Gross - Proportional reinsurance accepted	R0220						2,885	**2,885**
	Gross - Non-proportional reinsurance accepted	R0230							
	Reinsurers' share	R0240							**0**
	Net	R0300	4	3,426	221	423	228	2,885	**7,187**
Claims incurred	Gross - Direct Business	R0310		(94)					**(94)**
	Gross - Proportional reinsurance accepted	R0320							**0**
	Gross - Non-proportional reinsurance accepted	R0330							
	Reinsurers' share	R0340							**0**
	Net	R0400		(94)					**(94)**
Changes in other technical provisions	Gross - Direct Business	R0410							**0**
	Gross - Proportional reinsurance accepted	R0420							**0**
	Gross - Non-proportional reinsurance accepted	R0430							
	Reinsurers' share	R0440							**0**
	Net	R0500							**0**
Expenses incurred		R0550	309						**309**
Other expenses		R1200							
Total expenses		R1300							**309**

Annex I
S.17.01.02
Non-life Technical Provisions
(Reported in EUR 000's)

		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	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**							(4,183)										(4,183)
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	**R0140**																	
Net Best Estimate of Premium Provisions	**R0150**							(4,183)										(4,183)
Claims provisions																		
Gross	**R0160**							3,831										3,831
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	**R0240**																	
Net Best Estimate of Claims Provisions	**R0250**							3,831										3,831
Total Best estimate - gross	**R0260**							(352)										(352)
Total Best estimate - net	**R0270**							(352)										(352)
Risk margin	**R0280**							1,704										1,704
Amount of the transitional on Technical Provisions																		
Technical Provisions calculated as a whole	**R0290**																	
Best estimate	**R0300**																	
Risk margin	**R0310**																	
Technical provisions - total																		
Technical provisions - total	**R0320**							1,352										1,352
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	**R0330**																	
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	**R0340**							1,352										1,352

Annex I
S.19.01.21
Non-life Insurance Claims Information
(Reported in EUR 000's)
Total Non-Life Business

Accident year / Underwriting year	Z0010	UWY

Gross Claims Paid (non-cumulative)
(absolute amount)

		Development year											In Current year	Sum of years (cumulative)
Year		0	1	2	3	4	5	6	7	8	9	10 & +		
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0170	C0180
Prior	R0100											10,212	-	10,212
N-9	R0160	5,267	7,145	2,110	-	-	-	-	-	-	-		-	14,522
N-8	R0170	-	-	-	-	-	-	-	-	-			-	-
N-7	R0180	-	64	-	-	-	-	-	-				-	64
N-6	R0190	3,400	-	-	-	-	-	-					-	3,400
N-5	R0200	-	-	286	-	-	-						-	286
N-4	R0210	-	-	-	-	-							-	-
N-3	R0220	-	-	-	-								-	-
N-2	R0230	-	-	-									-	-
N-1	R0240	7,638	2										2	7,640
N	R0250	-											-	-
Total	R0260												2	36,124

Gross undiscounted Best Estimate Claims Provisions
(absolute amount)

		Development year											Year end (discounted data)
Year		0	1	2	3	4	5	6	7	8	9	10 & +	
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0360
Prior	R0100											-	-
N-9	R0160	-	-	-	-	-	-	-	-	-	-		-
N-8	R0170	-	-	-	-	-	-	-	-	-			-
N-7	R0180	-	-	-	-	-	-	-	-				-
N-6	R0190	-	-	-	-	-	-	-					-
N-5	R0200	-	-	-	-	-	-						-
N-4	R0210	-	-	-	-	-							-
N-3	R0220	-	-	295	-								-
N-2	R0230	3,752	591	306									307
N-1	R0240	2,985	573										576
N	R0250	2,943											2,948
Total	R0260												3,831

Annex I
S.23.01.01
Own funds
(Reported in EUR 000's)

		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 2015/35						
Ordinary share capital (gross of own shares)	R0010	8,500	8,500			
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	33,467	33,467			
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					
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						
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	41,967	41,967			
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	41,967	41,967			
Total available own funds to meet the MCR	R0510	41,967	41,967			
Total eligible own funds to meet the SCR	R0540	41,967	41,967			
Total eligible own funds to meet the MCR	R0550	41,967	41,967			
SCR	R0580	26,613				
MCR	R0600	6,653				
Ratio of Eligible own funds to SCR	R0620	158%				
Ratio of Eligible own funds to MCR	R0640	631%				

		C0060
Reconciliation reserve		
Excess of assets over liabilities	R0700	41,967
Own shares (held directly and indirectly)	R0710	
Foreseeable dividends, distributions and charges	R0720	
Other basic own fund items	R0730	8,500
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	
Reconciliation reserve	R0760	33,467
Expected profits		
Expected profits included in future premiums (EPIFP) - Life business	R0770	
Expected profits included in future premiums (EPIFP) - Non- life business	R0780	
Total Expected profits included in future premiums (EPIFP)	R0790	

Annex I
S.25.01.21
Solvency Capital Requirement - for undertakings on Standard Formula
(Reported in EUR 000's)

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0100
Market risk	R0010	10,694		
Counterparty default risk	R0020	414		
Life underwriting risk	R0030	-		
Health underwriting risk	R0040	-		
Non-life underwriting risk	R0050	21,361		
Diversification	R0060	(6,085)		
Intangible asset risk	R0070			
Basic Solvency Capital Requirement	R0100	26,384		

Calculation of Solvency Capital Requirement		
Operational risk	R0130	229
Loss-absorbing capacity of technical provisions	R0140	
Loss-absorbing capacity of deferred taxes	R0150	
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	
Solvency capital requirement excluding capital add-on	R0200	26,613
Capital add-on already set	R0210	
Solvency capital requirement	R0220	26,613
Other information on SCR		
Capital requirement for duration-based equity risk sub-module	R0400	
Total amount of Notional Solvency Capital Requirement for remaining part	R0410	
Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420	
Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios	R0430	
Diversification effects due to RFF nSCR aggregation for article 304	R0440	

Annex I

S.28.01.01

Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity

(Reported in EUR 000's)

Linear formula component for non-life insurance and reinsurance obligations

		C0010
MCR_{NL} Result	R0010	571

		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		
Workers' compensation insurance and proportional reinsurance	R0040		
Motor vehicle liability insurance and proportional reinsurance	R0050		
Other motor insurance and proportional reinsurance	R0060		
Marine, aviation and transport insurance and proportional reinsurance	R0070		
Fire and other damage to property insurance and proportional reinsurance	R0080	0	7,620
General liability insurance and proportional reinsurance	R0090		
Credit and suretyship insurance and proportional reinsurance	R0100		
Legal expenses insurance and proportional reinsurance	R0110		
Assistance and proportional reinsurance	R0120		
Miscellaneous financial loss insurance and proportional reinsurance	R0130		
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
MCR_{L} Result	R0200	

		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		
Total capital at risk for all life (re)insurance obligations	R0250		

Overall MCR calculation

		C0070
Linear MCR	R0300	571
SCR	R0310	26,613
MCR cap	R0320	11,976
MCR floor	R0330	6,653
Combined MCR	R0340	6,653
Absolute floor of the MCR	R0350	2,500
		C0070
Minimum Capital Requirement	R0400	6,653