

DARNELL DAC
BNP PARIBAS GROUP

SOLVENCY AND FINANCIAL CONDITION REPORT

FOR THE YEAR ENDED 31 DECEMBER 2018

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SUMMARY

Business and Performance

Darnell Designated Activity Company ("Darnell" and "the Company") is a wholly owned subsidiary of the BNP Paribas Group.

Darnell is authorised by the Central Bank of Ireland ("CBI") to carry out the business of life and non-life reinsurance and has been designated as a medium-low impact undertaking by the CBI under its risk-based framework for the supervision of regulated firms, known as PRISM. Darnell is reporting as an individual undertaking for Solvency II.

Darnell trades as a composite reinsurer, providing underwriting facilities in respect of risks arising in fellow BNP Paribas Group companies (and their customers) and in respect of risks arising from third parties, principally death and disability, theft, loss or damage to specified items and excess loss risks.

There were no significant events during 2018 where the Company continued its activities as described above while noting that effective from 1st January 2016 one of the main reinsurance treaties of the Company has been in run-off.

The following table summarises the performance of the Company for the reporting period and the prior year.

INCOME STATEMENT EUR'000s	Dec-18	Dec-17
Underwriting Performance	26,124	27,686
Investment Performance	(2,332)	8,809
Other Income & Expenses	-	-
Net Profit before Tax	**23,792**	**36,495**
Corporation tax	(2,974)	(4,562)
Net Profit after Tax	**20,818**	**31,933**

During 2018 the Company paid a dividend to its sole shareholder, BNP Paribas Ireland Unlimited Company, of EUR32m (2017 EUR32m).

System of Governance

Darnell has established and maintains an effective system of governance with clear delegated authorities, responsibilities and reporting lines as presented in the organisation chart which can be found at appendix 1 of this report.

Darnell has assessed its system of governance 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 the operations of the Company.

Risk Profile

Darnell has implemented effective processes for assessing and mitigating its material risk exposures.

There were no material changes in the Company's risk exposure or to the strategies, policies and processes for managing this risk during the reporting period.

Underwriting Risk

Darnell reinsures diverse types of products, principally death and disability, theft, loss or damage to specified items and excess of loss risks, through quota share, excess of loss and stop loss treaties. The Company's primary reinsured product is creditor insurance and within the creditor insurance product; invalidity, total permanent disability and death risks are covered.

Market Risk

The Company's material market risk exposure relates to:

- its investment portfolio of fixed income bonds, structured notes and collective investment undertakings
- its assets and liabilities exposed to interest rate movements
- its assets and liabilities denominated in foreign currencies which are exposed to currency risk

Credit Risk

The Company's material credit risk exposures relate to amounts due from cedants and amounts held on demand with banks with the majority of exposure relating to BNP Paribas Group companies.

Liquidity Risk

The Company's exposure to liquidity risk is considered to be low as it maintains a high level of liquid assets to meet its liabilities.

Operational Risk

The Company's material operational risk exposures relate to outsourcing, execution, delivery and process management and people.

Valuation for Solvency Purposes

The following table presents a summary of the Solvency II valuation of each material class of asset and liability compared to the Statutory Accounts at 31st December 2018 and at 31st December 2017.

BALANCE SHEET (EUR'000s)	31-Dec-18			31-Dec-17		
Assets	**Solvency II Value**	**Statutory Accounts Value**	**Difference**	**Solvency II Value**	**Statutory Accounts Value**	**Difference**
Government Bonds	33,962	32,875	1,087	34,312	32,650	1,662
Corporate Bonds	205,826	205,192	634	169,816	163,254	6,562
Collective Investment Undertakings	55,244	55,244	-	123,554	123,554	-
Structured Notes	13,968	13,968	-	8,585	8,585	-
Insurance and Intermediaries receivables	25,333	25,333	-	27,763	27,763	-
Receivables (trade, not insurance)	542	542	-	279	279	-
Cash and cash equivalents	6,946	6,946	-	3,543	3,543	-
Any other assets, not elsewhere shown	-	1,854	(1,854)	-	1,556	(1,556)
Total Assets	**341,821**	**341,954**	**(133)**	**367,852**	**361,183**	**6,668**

Liabilities	**Solvency II Value**	**Statutory Accounts Value**	**Difference**	**Solvency II Value**	**Statutory Accounts Value**	**Difference**
Technical Provisions	118,481	192,012	(73,531)	120,236	199,011	(78,775)
Deferred tax liabilities	9,358	163	9,195	11,007	327	10,680
Insurance & intermediaries payables	22,718	22,718	-	23,282	23,282	-
Payables (trade, not insurance)	658	658	-	978	978	-
Total Liabilities	**151,214**	**215,551**	**(64,337)**	**155,503**	**223,599**	**(68,095)**

Excess of Assets Over Liabilities	**190,607**	**126,403**	**64,203**	**212,348**	**137,584**	**74,763**

The following are the differences between the valuation bases, methods and main assumptions used by the Company for the valuation of assets and liabilities for solvency purposes and those used for their valuation in the Statutory Accounts:

i. For Solvency II government bonds and corporate bonds held are valued at market consistent values using quoted prices in an active market. For the Statutory Accounts government bonds and corporate bonds held are valued at amortised cost using the effective interest method.

ii. Technical provisions are valued for Solvency II by applying adjustments to the Statutory Accounts technical provisions including:
   a) Future premiums and associated cashflows are allowed for within the contract boundary
   b) Events Not in the Data are allowed for
   c) Expenses are included on a going concern basis
   d) Discounting using prescribed EIOPA yield curves
   e) Risk margin is included

Note also:

- that for the Statutory Accounts accrued interest on government bonds and corporate bonds is reported as 'Any other assets, not elsewhere shown'. For Solvency II this accrued interest amount is not reported as a separate item but included in the overall valuation of the government bonds and corporate bonds reported.
- that the deferred tax liability on a Solvency II basis increases due to the difference in the valuation of assets and technical provisions as outlined above.

Capital Management

The following table summarises the solvency position of the Company at 31st December 2018 and at 31st December 2017 which is assessed using the Standard Formula.

Solvency Position EUR'000s	Dec-18	Dec-17
Total Tier 1 Unrestricted Own Funds	190,607	212,348
Solvency Capital Requirement ("SCR")	105,728	108,746
SCR Coverage	180%	195%
Minimum Capital Requirement ("MCR")	26,432	27,187
MCR Coverage	721%	781%

The reduction in Solvency Capital Requirement and Minimum Capital Requirement is expected due to the continued run-off of one of the main reinsurance treaties of the Company.

All the Company's own funds are all classified as tier 1 unrestricted and are available to cover the Solvency Capital Requirement and Minimum Capital Requirement.

There were no instances of non-compliance with the Minimum Capital Requirement and the Solvency Capital Requirement for Darnell during the reporting period ended 31st December 2018.

Report Approval

This report was reviewed by the Company's Audit Committee on 15th April 2019. It was subsequently reviewed and approved by the Board of Directors on 16th April 2019.

A. BUSINESS AND PERFORMANCE

A.1. Business

A.1.1. Name and Legal Form of the Company

Darnell Designated Activity Company ("Darnell" and "the Company") is a private company which is limited by shares.

A.1.2. Supervisory Authority

Darnell is authorised by the Central Bank of Ireland ("CBI"), New Wapping Street, North Wall Quay, Dublin 1, Ireland to carry out the business of life and non-life reinsurance in accordance with the provisions of the European Union (Insurance & Reinsurance) Regulations 2015.

Darnell has been designated as a medium-low impact undertaking by the CBI under its risk-based framework for the supervision of regulated firms, known as PRISM.

Darnell is reporting as an individual undertaking for Solvency II.

A.1.3. External Auditor

The Company's current External Auditor is Deloitte Ireland LLP, Earlsfort Terrace, Dublin 2, Ireland.

A.1.4. Qualifying holdings

The Company is a wholly owned subsidiary of BNP Paribas Ireland Unlimited Company, 5 George's Dock, IFSC, Dublin 1, Ireland.

The ultimate parent company is BNP Paribas S.A., a company incorporated in France and listed on the Euronext Paris stock exchange. BNP Paribas S.A.'s consolidated financial statements are available from the company at 16 Boulevard des Italiens, 75009 Paris, France.

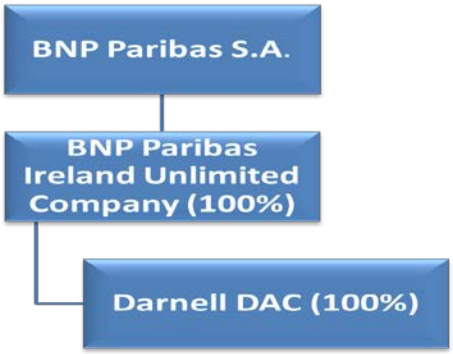
A.1.5. Group Structure

Darnell is reporting as an individual undertaking for Solvency II.

The Company is a wholly owned subsidiary of BNP Paribas Ireland Unlimited Company, a company incorporated in Ireland, with an address of 5 George's Dock, IFSC, Dublin 1, Ireland.

The ultimate parent company is BNP Paribas S.A., a company incorporated in France and listed on the Euronext Paris stock exchange. The company's consolidated financial statements are available from the company at 16 Boulevard des Italiens, 75009 Paris, France.

The following is a simplified Group structure.



A.1.6. Related Undertakings

As a 100% sole member owned company as described in A.1.5, the Company does not have any related undertakings that it has control of or an obligation to report results on.

A.1.7. Material Lines of Business and Geographical Areas

Darnell trades as a composite reinsurer, providing underwriting facilities in respect of risks arising in fellow BNP Paribas Group companies (and their customers) and in respect of risks arising from third parties, principally death and disability, theft, loss or damage to specified items and excess loss risks.

The table below presents the material lines of business and geographical location by gross written premium for the 2017 reporting period along with the prior reporting period.

Material Lines of Business & Geographic Location EUR'000s	Life Reinsurance Obligations				Non-Life Accepted Proportional Reinsurance				Non-Life Accepted Non-Proportional Reinsurance		Total	
	Life Reinsurance		Heath Reinsurance		Miscellaneous Financial Loss		Motor Vehicle Liability Insurance		Casualty			
	EU	Non-EU	EU	Non-EU	EU	Non-EU	EU	Non-EU	EU	Non-EU	EU	Non-EU
Gross Written Premium 2018	84,207	29,270	23,549	-	26,243	-	6,159	-	1,947	-	142,105	29,270
Gross Written Premium 2017	98,378	49,170	29,470	-	29,950	-	7,114	-	1,853	-	166,765	49,170

Note that the reduction in gross written premiums in 2018, compared to 2017, is expected due to the continued run-off of one of the main reinsurance treaties of the Company.

All the activities are carried out from Ireland.

A.1.8. Significant Business or Other Events

There is no significant business or other event that has occurred over the reporting period that has had a material impact on the Company.

A.2. Underwriting Performance

The tables below summarise the underwriting performance for the year end 2018 along with the prior reporting period.

Underwriting Performance 2018 EUR'000s	Life Reinsurance Obligations		Non-Life Accepted Proportional Reinsurance		Non-Life Accepted Non-Proportional	Total
	Life Reinsurance	Heath Reinsurance	Miscellaneous Financial Loss	Motor Vehicle Liability Insurance	Casualty	
Premiums Written						
Gross Written Premium	113,477	23,549	26,243	6,159	1,947	171,375
Reinsurers Share	(3,411)	-	-	-	-	(3,411)
Net Written Premium	**110,066**	**23,549**	**26,243**	**6,159**	**1,947**	**167,964**
Premiums Earned						
Gross Earned Premium	113,870	23,658	26,656	6,159	1,947	172,290
Reinsurers Share	(3,411)	-	-	-	-	(3,411)
Net Earned Premium	**110,459**	**23,658**	**26,656**	**6,159**	**1,947**	**168,879**
Claims Incurred						
Gross Claims Incurred	(37,822)	(36,737)	(3,742)	(4,132)	(1,813)	(84,246)
Reinsurers Share	1,744	-	-	-	-	1,744
Net Claims Incurred	**(36,078)**	**(36,737)**	**(3,742)**	**(4,132)**	**(1,813)**	**(82,502)**
Expenses Incurred	**(34,670)**	**(5,645)**	**(18,622)**	**(1,815)**	**499**	**(60,253)**
Net Underwriting Income	**39,711**	**(18,724)**	**4,292**	**212**	**633**	**26,124**

Underwriting Performance 2017 EUR'000s	Life Reinsurance Obligations		Non-Life Accepted Proportional Reinsurance		Non-Life Accepted Non-Proportional	Total
	Life Reinsurance	Heath Reinsurance	Miscellaneous Financial Loss	Motor Vehicle Liability Insurance	Casualty	
Premiums Written						
Gross Written Premium	147,548	29,470	29,950	7,114	1,853	215,935
Reinsurers Share	(22,033)	-	-	-	-	(22,033)
Net Written Premium	125,516	29,470	29,950	**7,114**	**1,853**	**193,902**
Premiums Earned						
Gross Earned Premium	148,061	29,616	30,331	7,114	1,853	216,975
Reinsurers Share	(22,033)			-		(22,033)
Net Earned Premium	126,028	29,616	30,331	**7,114**	**1,853**	**194,942**
Claims Incurred						
Gross Claims Incurred	(1,413)	(90,830)	(4,564)	- 4,594	490	(100,911)
Reinsurers Share	1,733	-	-	-	-	1,733
Net Claims Incurred	319	(90,830)	(4,564)	- **4,594**	**490**	**(99,178)**
Expenses Incurred	(37,414)	(7,094)	(20,835)	- **2,170**	**(565)**	**(68,078)**
Net Underwriting Income	**88,933**	**(68,308)**	**4,932**	**350**	**1,778**	**27,686**

Note that the reduction in written premiums and earned premiums in 2018 for Life Reinsurance and Health Reinsurance obligations, compared to 2017, is expected due to the continued run-off of one of the main reinsurance treaties of the Company

A.3. Investment Performance

The Company has an investment policy, regularly reviewed by the Board that is designed to optimise returns relative to the overall risk appetite. The Board determines investment parameters having challenged and taken into account the advice received from appointed BNP Paribas Group investment advisors, scrutinised by a dedicated Committee of the Board that makes appropriate recommendations.

The tables below summarise the investment performance for the year end 2018 and 2017.

Investment Performance 2018 EUR'000s	Income from investments	Unrealised gains / (losses) on investment	Realised gains / (losses) on investment	Investment expense/ charges	Total investment return
Cash and cash equivalents	-	-	-	351	351
Collective Investment Undertakings	-	(6,747)	481	-	(6,266)
Structured Notes	-	(1,032)	730	-	(302)
Government Bonds & Corporate Bonds	4,039	-	987	(1,141)	3,885
Derivatives	-	-	-	-	-
Total	**4,039**	**(7,779)**	**2,198**	**(790)**	**(2,332)**

Investment Performance 2017 EUR'000s	Income from investments	Unrealised gains / (losses) on investment	Realised gains / (losses) on investment	Investment expense/ charges	Total investment return
Cash and cash equivalents	-	-	-	(3)	(3)
Collective Investment Undertakings	-	662	505	-	1,167
Structured Notes	-	287	225	-	512
Government Bonds & Corporate Bonds	4,595	-	4,393	(1,746)	7,242
Derivatives	-	-	-	-	(109)
Total	**5,383**	**949**	**5,123**	**(1,749)**	**8,809**

Overall investment return is lower is 2018 compared to 2017 mainly due to unrealised losses in year; the Company realised some gains from certain strategic disposals of bonds. The portfolio did not record the same level of unrealised mark-to-market gains as 2017.

A.4. Performance of Other Activities

There are no other material income and expenses incurred over the reporting period to report on.

A.5. Any other information

During the reporting period the following material transactions took place with the Company's shareholder:

1. On 8th May 2018 the Company paid a dividend to its sole shareholder, BNP Paribas Ireland Unlimited Company, of EUR32m.

B. SYSTEM OF GOVERNANCE

B.1. General Information on the System of Governance

B.1.1. Overview of the System of Governance

Darnell has established and maintains an effective system of governance with clear delegated authorities, responsibilities and reporting lines as presented in the organisation chart at appendix 1 of this report.

The system of governance is regularly reviewed to ensure its continued appropriateness reflecting changing commercial and regulatory requirements and organisational developments.

B.1.1.1. Board of Directors

The table below presents the composition of the current Board of Directors of Darnell along with each Directors designation and a summary of the segregation of responsibilities within Board Committees.

Director Name	Director Designation	Board Committee Membership & Responsibilities
Derek Kehoe	Non-Executive Director & Chair	Finance Committee Member
Christine Moran	Independent Non-Executive Director	Chair of the Audit Committee & Risk Committee Member
Paul Duffy	Independent Non-Executive Director	Audit Committee Member & Chair of the Risk Committee
Stanislas Chevalet	Non-Executive Director	
Denis Wallerich	Non-Executive Director	Risk Committee Member, Chair of Underwriting Committee
Kim Reichental	Non-Executive Director	Audit Committee Member
Remi Esclattier	Executive Director & Chief Operating Officer	Chair of Finance Committee, Underwriting Committee Member
John Perham	Executive Director & General Manager	Risk Committee Member, Underwriting Committee Member

The Board of Directors is responsible for the effective, prudent and ethical oversight of the Company and meets on a quarterly basis or more frequently as required.

The Board is responsible for setting and overseeing:

- the business strategy for the Company
- a robust and transparent organisational structure with effective communication and reporting channels
- the amounts, types and distribution of capital adequate to cover the risks of the Company
- the strategy for the on-going management of material risks
- an adequate and effective internal control framework, that includes well-functioning actuarial, risk management, compliance and internal audit functions as well as an appropriate financial reporting and accounting framework

The role and responsibilities of the Board of Directors are clearly documented in its Terms of Reference and Schedule of Reserved Matters which are reviewed on an annual basis by the Board of

Directors taking advice from the Audit Committee who make periodic recommendations to the Board to ensure a high standard of practice is maintained.

B.1.1.2. Board Committees

Darnell's Board of Directors has established four Board Committees that meet at least three times a year, or more frequently as required, and report to the Board, namely the Audit Committee, Risk Committee, Underwriting Committee and Finance Committee.

The authority, functions, membership and reporting lines of the committees established by the Board as well as meeting frequency, voting rights and quorums are clearly outlined in the written Terms of Reference established by the Board for each committee.

The Terms of Reference are reviewed at least annually by the committees to ensure continuing appropriateness. Recommendations on revisions are provided to the Board for review and approval where necessary.

Audit Committee

The main roles and responsibilities of the Audit Committee are:

- Review financial statements and other published documents and make recommendations to the Board
- Review all annual reports and published QRTs produced as part of ongoing Solvency II requirements
- Monitor the effectiveness, independence and objectivity of the external auditor
- Monitor the effectiveness of the Company's internal audit function in the context of the Company's overall risk management system
- Review any significant matters raised by the internal and external auditors
- Review the effectiveness and appropriateness of the Company's internal controls
- Review the Company's arrangements for its employees to raise concerns, in confidence, about possible wrong-doing in financial reporting or other matters
- Review and monitor Corporate Governance arrangements operating and make recommendations to the Board as required
- Monitor the effectiveness of the compliance function

Risk Committee

The main roles and responsibilities of the Risk Committee are:

- Monitor the effectiveness of the Company's risk management system
- Monitor the implementation of the Company's risk strategy and maintenance thereof
- Review and make recommendation to the Board on risk appetite and risk management policies across the Company
- Review capital and solvency position of the Company
- Oversee the own risk & solvency assessment process
- Monitoring the effectiveness of the risk management function

Underwriting Committee

The main roles and responsibilities of the Underwriting Committee are:

- Review new underwriting business proposals
- Review the performance of the underwriting activities of the Company
- Ensure compliance with the Board approved underwriting policy and reserving policy of the Company
- Monitor external developments in relation to the underwriting activities

Finance Committee

The main roles and responsibilities of the Finance Committee are:

- Ensure compliance with the Board approved investment policy for the Company
- Ensure that the Company is in compliance with the prudent person principle
- Maximise the investment return while ensuring that the liability profile of the Company is hedged with suitable investments and minimising the risk of loss due to counterparty default
- Review the performance of the investment advisor to the Company
- Monitor external developments in relation to investments

B.1.1.3. Key Functions

General Manager

Darnell has appointed a General Manager who has overall responsibility for the prudent and efficient operations of the business of the Company.

The General Manager has relevant financial services expertise, qualifications and background to ensure that he has the necessary knowledge, skills and experience required to comprehend fully each of the following:

- the nature of the Company's business activities and related risks
- his individual direct and indirect responsibilities and the Board's responsibilities
- the Company's financial statements

The General Manager is also a member of the Board of Directors, the Underwriting Committee and the Risk Committee. The Finance Committee and the Audit Committee may invite the General Manager to attend its meetings as required to do so.

Chief Operating Officer

Darnell has appointed a Chief Operating Officer who along with the General Manager has responsibility for the prudent and efficient operations of the business of the Company.

The Chief Operating Officer also has relevant financial services expertise, qualifications and background to ensure that he has the necessary knowledge, skills and experience required to comprehend fully each of the following:

- the nature of the Company's business activities and related risks
- his individual direct and indirect responsibilities and the Board's responsibilities
- the Company's financial statements

The Chief Operating Officer is also a member of the Board of Directors, the Underwriting Committee and the Finance Committee. The Risk Committee and the Audit Committee may invite the Chief Operating Officer to attend its meetings as required to do so.

Risk Management Function

Darnell has appointed a Chief Risk Officer who is responsible for the risk management function. The Chief Risk Officer role has been outsourced to another BNP Paribas Group entity in Ireland, Greenval Insurance Designated Activity Company and Service Level Agreements are in place to give appropriate effect to the current arrangements.

Refer to section B.3.2 of this report for further information on the implementation of the risk management function.

Compliance Function

Darnell has appointed a Head of Compliance who is responsible for the compliance function. The Head of Compliance role has been outsourced to Willis Towers Watson Management (Dublin) Limited.

Refer to section B.4.2 of this report for further information on the Compliance Function.

Actuarial Function

In line with the requirements of Solvency II, and the Central Bank of Ireland's 'Domestic Actuarial Regime and Related Governance Requirements under Solvency II', Darnell has appointed a Head of the Actuarial Function. KPMG has been engaged on an outsourced basis to provide the Head of the Actuarial Function.

Refer to section B.6 of this report for further information on the Actuarial Function.

Internal Audit Function

Darnell has outsourced its internal audit function to an independent BNP Paribas Group Function, Inspection Generale. Darnell has appointed the Head of Inspection Generale for the BNP Paribas Group in Ireland as the Company's Head of Internal Audit Function and the appointment has received PCF approval from the Central Bank of Ireland.

Refer to section B.5 of this report for further information on the implementation and independence of the internal audit function.

B.1.2. Material Changes to the System of Governance

The following Board and key function appointments were made during the reporting period:

- Eamonn Quinn resigned as an Independent Non-Executive Director on 25th July 2018
- Kim Recichental was appointed as a Non Executive Director on 25th July 2018

Apart from the above there were no other material changes to the System of Governance during the reporting period.

B.1.3. Remuneration Practices

Principles of remuneration practices

Darnell recognises that the existence of appropriate compensation to attract and retain competent, experienced and skilled people is an essential part of the Company's business strategy but that any compensation provided should align peoples' decision-making and risk-taking behaviour with the Company's business objectives and risk management strategy.

Executive Directors are directly remunerated by the Company for their services. Non-Executive Directors, who are employees of the BNP Paribas Group are not remunerated by the Company. Independent Non-Executive Directors receive a fixed Director fee with no variable component.

Share options, shares or variable components of remuneration

The Company does not offer or operate share participation schemes in its own share stock, nor is there any variable compensation paid by the Company to any Non Executive Board member, directly employed staff or indirect agents based on direct company performance. Executive Directors are subject to receive certain variable performance related compensation based on Company performance.

Performance is assessed in line with BNP Paribas Group policy by the Chairman of the Company and certain related Group functions and is subject to certain Board oversight through certain committees.

Those serving Board members or staff assigned to the Company who are employees of the BNP Paribas Group may, as part of their remuneration arrangements with the Group, participate in share and / or options schemes operated by the Group in publicly traded stocks issued by the ultimate parent company.

Supplementary pension or early retirement schemes for the members of the Board of Directors and other key function holders

The Company's remuneration practices do not include any supplementary pension or early retirement schemes for members of the Board of Directors or key function holders.

B.1.4. Material Transactions

During the reporting period the following material transactions took place with the Company's shareholder, with persons who exercise a significant influence on the Company, and with members of the Board of Directors:

1. On 8th May 2018 the Company paid a dividend to its sole shareholder, BNP Paribas Ireland Unlimited Company, of EUR32m (2017: EUR32m).

B.2. Fit and Proper Requirements

B.2.1. Requirements for Skills, Knowledge and Expertise

Darnell ensures that the persons who effectively run the Company or have other key functions, including members of the Board, are 'fit' and take account of the respective duties allocated to them to ensure the provision of sound and prudent management through their professional qualifications, knowledge and experience and are proper by being of good repute and integrity.

Darnell ensures that that the persons, who effectively run the Company or have other key functions, including members of the Board, collectively possess at least qualification, experience and knowledge about:

a) insurance and financial markets
b) business strategy and business model
c) system of governance
d) financial and actuarial analysis
e) regulatory framework and requirements.

B.2.2. Process for Assessing the Fitness & Probity of Persons

Darnell has established and implemented a Fitness and Probity Policy, which sets out the process for assessing the fitness & probity of persons, and aligns with the Central Bank of Ireland's Fitness and Probity Standards.

Darnell's assessment of the 'Fitness' of persons include:

1. Identification (copy of passport)
2. Compliance with the minimum competency code, where relevant
3. Evidence of professional qualifications
4. Obtain self-certification from the person that they are compliant with any required continuing professional development
5. Record of interview and application where relevant
6. Make all reasonable efforts to obtain references
7. Record of previous experience

8. Record of experience gained outside of Ireland
9. Concurrent responsibilities
    a) Other directorships
    b) Other employments
    c) Other potential conflicts of interest
10. CBI Individual Questionnaire as applicable

Darnell's assessment of the 'Probity' of persons includes considering whether the individual is of good repute and integrity, including an assessment of their honesty and financial soundness which is based on their reputation, reflecting past conduct, criminal record, financial record and supervisory experience. Probity due diligence will include requesting completion of questions on reputation and character and on financial interest.

In compliance with the requirements of the CBI's Fitness and Probity Standards, prior approval for the appointment of certain function holders is obtained by Darnell from the Central Bank of Ireland.

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

B.3.1. Risk Management System

For its risk management system:

- Darnell has established and maintains an effective ***system of governance*** with clear delegated authorities, responsibilities and reporting lines as presented in section B.1.1 of this report.
- Darnell adopts "3 lines of defence" for ***risk governance*** responsible for monitoring the risk appetite and the risk profile. Board Committees and Business Functions have been established, respecting the needed lines of defence. Risk owners and clear allocation of risk responsibilities have been set.
- The Board of Directors has defined its ***risk appetite*** through a top-down approach where the Board has set the overall risk appetite and different tolerances in line with the business strategy. Darnell operates within the risk tolerance limits set by the Board considering the Company's exposure to particular categories of risk, which comprise the risk profile of the Company, which can be controlled, measured and reported. A trigger monitoring and reporting framework based on risk threshold limits (acceptable, warning, immediate action and material deviation) is used to signal activities and reporting requirements. The risk appetite statement and tolerance limits are subject to regular review and amendment to ensure that evolving business strategy, financial capacity, regulatory constraints, other internal/external factors and the needs and input of its stakeholders are appropriately reflected.
- Documented ***risk & internal control policies*** have been established to ensure implementation of the risk management strategy and to obtain the benefits of the risk management framework.
- An ***Own Risk & Solvency Assessment*** is carried out on at least an annual basis as set out in section B.3.3 of this report.

B.3.2. Implementation of the Risk Management System including the Risk Management Function

<u>Risk Management Function</u>

Darnell has appointed a Chief Risk Officer who is responsible for the risk management function as set out in section B.1.1.3 of this report.

<u>Risk Management Function Responsibilities</u>

The responsibilities of the Risk Management Function include:

- maintaining and monitoring the effectiveness of the insurance undertaking's risk management system

- ensuring the Company has effective processes in place to identify and manage the risks to which the Company is or might be exposed
- maintaining effective processes to monitor and report the risks to which the Company is or might be exposed
- facilitation of the setting of the risk appetite by the Board
- providing comprehensive and timely information on the Company's material risks which enables the Board to understand the overall risk profile of the Company

The risk management activities are set out in an annual risk management action plan prepared by the Chief Risk Officer which is reviewed by the Risk Committee. The Chief Risk Officer is responsible for the risk management action plan and reports to the Risk Committee and the Board of Directors.

B.3.3. Own Risk & Solvency Assessment ("ORSA")

ORSA Process

On at least an annual basis Darnell carries out a regular assessment of its solvency and risks, the ORSA process, which includes:

- The level of own funds that Darnell needs to hold to cover the ORSA own solvency needs & the regulatory solvency capital requirement
- The prospective solvency ratios that Darnell will achieve when realising the business plan over the business planning time horizon
- The resilience of these ratios under stress test scenarios

Darnell will also carry out a non-scheduled ORSA, outside of the regular annual assessment, if there is a significant change in the risk profile of the Company.

Darnell has established and implemented an ORSA policy which describes how the ORSA is performed, internally documented and reviewed.

ORSA Governance

The Board of Directors has ultimate responsibility for the ORSA and the role of the Board of Directors in the ORSA process is:

- Directing – how the assessment is to be performed and approving the policy
- Challenging – assumptions, methodologies and results
- Decision making - taking into account the output from the ORSA
- Approval – results and report

The Board of Directors has delegated operational responsibility for the ORSA preparation and certain review processes as follows:

1. The Chief Risk Officer is responsible for the operational ORSA co-ordinating process
2. The General Manager provides day to day oversight
3. The Risk Committee is responsible for oversight of the ORSA process which is a standing agenda item for all quarterly Risk Committee meetings
4. Audit Committee receives updates from Risk Committee Chair on matters arising requiring further independent consideration

Final approval of the ORSA process is with the Board.

Determination of Own Solvency Needs

Darnell's Board of Directors has determined that the Standard Formula should be used to calculate the solvency capital requirement and to assess the overall solvency needs of the ORSA. A business

planning time horizon of three years is used to project the Solvency II Balance Sheet and solvency capital requirement at each year end of the business planning time horizon. The base case projections are then subjected to a range of stress tests and scenario analysis to assess the resilience of the solvency position of the Company. The results of the assessment are reviewed by the Board and, where appropriate, potential management actions are agreed.

B.3.4. Risk Management System for Internal Model Users

Darnell is not an internal model user and uses the Standard Formula for its Solvency Capital Requirement and Minimum Capital Requirement calculation.

B.4. Internal Control System

B.4.1. Internal Control System

Darnell has established an internal control system that is the overall framework which aims to ensure:

- The effectiveness and efficiency of the internal operations
- The reliability of internal and external information
- The security of transactions
- The compliance with laws, regulations and internal policies

The scope of the internal control system covers all activities for which the Company is responsible which includes activities carried out by all departments of Darnell and activities outsourced by the Company to a third party.
The internal control processes of Darnell are aligned with the key policies and procedures established and implemented by the Company. These key policies and procedures and internal control processes are regularly reviewed to ensure a continuous improvement.

Darnell's internal controls are composed of permanent controls and the periodic controls as presented in the table below. These two forms of controls are complementary but separated and independent from each other.

Permanent Control	A.1. Controls carried out by operational staff on their operations A.2. Controls carried out by other operational staff (cross checks etc.) A.3. Controls carried out by line managers
	B.1. Controls carried out by permanent control functions within the Company B.2. Controls carried out by permanent control functions independent of the Company
Periodic Controls	C. Controls carried out by Internal Audit

B.4.2. Implementation of the Compliance Function

<u>Compliance Function</u>

Darnell has appointed a Head of Compliance who is responsible for the compliance function as set out in section B.1.1.3 of this report.

<u>Compliance Function Responsibilities</u>

The responsibilities of the Compliance Function include:

- Identifying and assessing the compliance risks impacting the Company
- 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 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
- Through its opinions, recommendations, supervision and independent controls provide reasonable assurance of the effectiveness and consistency of the internal processes used to control the compliance of the Company's operations and protect its reputation.
- Provide adequate input to the overall risk management system in respect of compliance risk
- Ensure that the undertaking complies with internal strategies, policies, processes and reporting procedures
- Reporting to the Audit Committee and Board in relation to ongoing compliance monitoring activities

The compliance activities are set out in an annual compliance plan prepared by the Head of Compliance which is reviewed by the Audit Committee and Board of Directors. The Head of Compliance is responsible for the compliance plan and monitoring program and reports to the Board of Directors.

B.5. Internal Audit Function

B.5.1. Implementation of the Internal Audit Function

Internal Audit Function

The internal audit function is an independent function within Darnell, and constitutes an integral element of the Company's control framework, with 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.
The Internal Audit function does not hold any executive responsibilities, other key function responsibilities or any accountability for risk management or systems of internal control, other than to appraise their effectiveness.

Darnell has outsourced its internal audit function to an independent BNP Paribas Group Function, Inspection Generale as set out in section B.1.1.3 of this report.

Internal Audit Function Responsibilities

The responsibilities of the Internal Audit Function include:

a) Establish, implement and maintain an audit plan setting out the audit work to be undertaken, taking into account all activities and the complete system of governance of the Company
b) Take a risk-based approach in deciding its priorities
c) Report the audit plan to the Audit Committee and if requested by the Audit Committee include assignments which are not included in the audit plan
d) Carry out reviews and submit a written report on its findings and recommendations to the Audit Committee

Oversight of Internal Audit Function

The Board of Darnell has delegated responsibility for overseeing the internal audit function of Darnell to the Company's Audit Committee.

The Audit Committee considers and records as part of their activities the following matters:

a) the independence, skill, experience and competency of its internal audit function and internal audit service providers
b) the terms of reference for the internal audit function
c) the budget to be allocated for internal audit services
d) the effectiveness and adequacy of the internal audit plan as proposed by the internal audit function
e) the arrangements, quality and periodicity of the assurance processes
f) the report of audit assignments received from the internal audit function
g) the adequacy of management's response to audit findings and recommendations

The Audit Committee regularly reviews the organisation, audit plan, audit programme and adequacy of resources to ensure the proper performance of the activities of the internal audit function. The Board and the Audit Committee recognise that from time to time they may request internal audit services from a third party service provider to assist the Company's internal audit function to carry out the reviews required. These engagements are one-off in nature and a separate engagement is agreed with the third party service provider for each individual engagement as applicable.

The Audit Committee through its Chair reports to the Board on the activities of the internal audit function.

B.5.2. Independence of the Internal Audit Function

The effectiveness of the internal audit function depends upon its independence from the day-to-day operations of the business, which allows the objective assessment of evidence to provide an independent opinion or conclusions regarding a process, system or other subject matter.

Darnell's Audit Committee, which is composed of Independent Non-Executive Directors, ensures that the internal audit function should not be subject to influence from the Board of Directors, Management and Business Functions of the Company that could impair its independence and impartiality.

The internal audit function, along with its BNP Paribas Group reporting responsibilities, reports directly to Darnell's Audit Committee and has direct access to the Chair of the Audit Committee, who is an Independent Non-Executive Director. This reporting structure ensures independence of the internal audit function.

B.6. Actuarial Function

Actuarial Function

Darnell has appointed a Head of the Actuarial Function ("HoAF") as set out in section B.1.1.3 of this report.

Actuarial Function Responsibilities

The responsibilities of the Actuarial Function include:

a) Coordination of the calculation of technical provisions;
b) Ensuring the appropriateness of the methodologies and underlying models used as well as the assumptions made in the calculation of technical provisions;
c) Assessing the sufficiency and quality of the data used in the calculation of technical provisions;
d) Comparing best estimates against experience;
e) Informing the Board of the reliability and adequacy of the calculation of technical provisions;
f) Expressing an opinion on the overall underwriting policy;
g) Expressing an opinion on the adequacy of reinsurance arrangements; and

h) Contributing to the effective implementation of the risk-management system.

B.7. Outsourcing

Darnell enters into outsourcing arrangements only where the risk can be effectively managed.

The Company has established and implemented an outsourcing policy with the objective of:

- establishing effective oversight of outsourced arrangements to ensure that the use of outsourcing within Darnell does not lead to a decline in the quality of internal controls and operational risk management
- ensuring that Darnell considers the additional risks associated with its outsourcing arrangements and enabling Darnell to mitigate the risk inherent with such outsourcing arrangements and control the outsourced functions

Darnell's outsourcing policy sets out the requirements for the following:

- Roles and Responsibilities
- Assessment of Outsourcing Options / Due Diligence
- Outsourced Contract and Service Level Agreement
- Monitoring Outsourced Arrangements
- Business Contingency Plans, including Exit Strategies
- Intra Group Outsourcing
- Regulatory Notifications

The table below presents the critical or important operational functions or activities that Darnell has outsourced together with the jurisdiction in which the service providers of such functions or activities are located.

Description of Functions or Activities	Jurisdiction
Head of Actuarial Function	Ireland
Head of Compliance Function	Ireland
Head of Internal Audit Function	Ireland
Chief Risk Officer	Ireland
Administration & Management	Ireland
Company Secretary	Ireland
Investment Advisory	Luxembourg
Custodian	Ireland
Actuarial Advisory	Ireland
Legal	Ireland
Finance	Ireland
Tax	Ireland
Human Resources	Ireland
IT, Facilities, Security & Business Continuity Management	Ireland

B.8. Any other information

Darnell has assessed its system of governance 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 the operations of the Company.

C. RISK PROFILE

C.1. Underwriting Risk

C.1.1. Material Underwriting Risks

Material Underwriting Risks

Darnell defines underwriting risk as the risk of loss, or of adverse change in the value of insurance liabilities, due to inadequate pricing and reserving assumptions which is the risk that premiums and current reserves are not sufficient to cover future incurred losses.

Darnell's trades as a composite reinsurer underwriting risks in respect of life and non-life risks arising in fellow BNP Paribas Group companies and from third parties.

Darnell reinsures diverse types of products, principally death and disability, theft, loss or damage to specified items and excess of loss risks, through quota share, excess of loss and stop loss treaties. The Company's primary reinsured product is creditor insurance and within the creditor insurance product; invalidity, total permanent disability and death risks are covered.

The Company's material underwriting risk exposures relate to pricing risk and reserving risk on the creditor insurance products underwritten.

Underwriting Risk Concentrations

A concentration of underwriting risk may arise from the following factors:

i. a particular line of business
ii. a particular demographic type of policyholder within a geographical location
iii. a particular grouping of ceding companies be it fellow BNP Paribas Group Companies or third party companies

The table below presents the material lines of business and geographical location by reference to gross written premium and net technical provisions from the Statutory Accounts for 2018 and 2017 and noting the cedant companies.

Material Lines of Business & Geographic Location (EUR'000s)	Life Reinsurance Obligations				Non-Life Accepted Proportional Reinsurance				Non-Life Accepted Non-Proportional Reinsurance		Total	
2018	Life Reinsurance		Heath Reinsurance		Miscellaneous Financial Loss		Motor Vehicle Liability		Casualty			
	EU	Non-EU	EU	Non-EU	EU	Non-EU	EU	Non-EU	EU	Non-EU	EU	Non-EU
Gross Written Premium (Statutory Accounts)												
BNP Paribas Group Companies	84,166	6,455	23,549	-	25,998	-	6,159	-	1,947	-	141,819	6,455
Non BNP Paribas Group Companies	41	22,815	-	-	245	-	-	-	-	-	286	22,815
Total	**84,207**	**29,270**	**23,549**	**-**	**26,243**	**-**	**6,159**	**-**	**1,947**	**-**	**142,105**	**29,270**
Net Technical Provisions (Statutory Accounts)												
BNP Paribas Group Companies	178,723	3,331	(4,160)	-	6,499	-	4,569	-	2,813	-	188,444	3,331
Non BNP Paribas Group Companies	-	-	-	-	237	-	-	-	-	-	237	-
Total	**178,723**	**3,331**	**(4,160)**	**-**	**6,736**	**-**	**4,569**	**-**	**2,813**	**-**	**188,681**	**3,331**

Material Lines of Business & Geographic Location (EUR'000s)	Life Reinsurance Obligations				Non-Life Accepted Proportional Reinsurance				Non-Life Accepted Non-Proportional Reinsurance		Total	
2017	Life Reinsurance		Heath Reinsurance		Miscellaneous Financial Loss		Motor Vehicle Liability		Casualty			
	EU	Non-EU	EU	Non-EU	EU	Non-EU	EU	Non-EU	EU	Non-EU	EU	Non-EU
Gross Written Premium (Statutory Accounts)												
BNP Paribas Group Companies	98,328	6,996	29,470	-	29,644	-	7,114	-	1,853	-	166,409	6,996
Non BNP Paribas Group Companies	50	42,174	-	-	306	-	-	-	-	-	356	42,174
Total	**98,378**	**49,170**	**29,470**	**-**	**29,950**	**-**	**-**	**-**	**1,853**	**-**	**166,765**	**49,170**
Net Technical Provisions (Statutory Accounts)												
BNP Paribas Group Companies	137,438	3,011	45,305	-	8,875	-	3,047	-	1,000	-	195,665	3,011
Non BNP Paribas Group Companies	25	-	-	-	310	-	-	-	-	-	335	-
Total	**137,463**	**3,011**	**45,305**	**-**	**9,186**	**-**	**3,047**	**-**	**1,000**	**-**	**192,953**	**3,011**

The reduction in gross written premiums in 2018, compared to 2017, is expected due to the continued run-off of one of the main reinsurance treaties of the Company offset somewhat by premium on a new proportional reinsurance treaty, with another BNP Paribas Group Company, for non-life motor vehicle liability insurance risks.

C.1.2. Assessment and Risk Mitigation Techniques used for Underwriting Risks

The Company monitors and develops the management of the underwriting risks in accordance with best practice principles and good underwriting discipline.

Darnell has implemented an effective process for assessing and mitigating underwriting risk which includes the following key elements:

- By establishing and implementing the following policies to direct the underwriting activities:
    1) Underwriting policy
        - Underwriting policy sets out the Company's underwriting principles & process, risk appetite, approach to managing exposure including key controls for the underwriting process and monitoring of the underwriting performance
    2) Retrocession policy
        - Retrocession is used to mitigate the underwriting risk on retained lines, according to the Company's underwriting risk appetite
        - Retrocession strategy is reviewed at least annually to verify that the levels of protection being ceded are commensurate with any developments in exposure
    3) Reserving policy
        - Reserving is conducted in accordance with the Company's reserving policy
        - Periodic reviews of the Company's claims provisions and the adequacy thereof are conducted during the year by KPMG
        - Head of Actuarial Function, which has been outsourced to KPMG, provides an annual Actuarial Opinion and Report on Technical Provision. This opinion confirms the adequacy of the technical provisions.
- By establishing an Underwriting Committee, with an appropriate representation of executive and non-executive directors, which meets at least three times a year to review underwriting activities

The risk mitigation strategies and policies outlined above are reviewed quarterly by the Underwriting Committee and/or Board as required to ensure that they are still effective and appropriate for the risk profile of the Company.

There were no material changes to the strategies, policies and processes for mitigating underwriting risk during this reporting period.

C.1.3. Risk Sensitivity of Underwriting Risks

The Company carries out stress and scenario testing as part of the ORSA process which includes testing for the deterioration of claims experience, a reduction in future premium and an increase in lapse rates. Underwriting risk is a key element of the Company's solvency capital requirement and the results of stress testing clearly demonstrates the key drivers of the underwriting risk SCR. The stress testing results highlight that there could be a material adverse movement in the solvency position of the Company should the scenarios assessed occur. In the event of occurrence, the Board would invoke its capital management strategy in a similar way to those actions set out at section E2.4.

C.2. Market Risk

C.2.1. Material Market Risks

<u>Material Market Risks</u>

Darnell defines market risk as the risk of a financial loss (market value and revenue), arising from adverse movements in market parameters which comprise, but are not limited to, foreign exchange rates, bond prices, equity prices, derivatives prices and parameters that can be derived from the previous ones such as interest rates, credit spreads, implied volatility or implied correlation.

The Company is exposed to market risk on:

- its investment portfolio of fixed income bonds, structured notes and collective investment undertakings
- its assets and liabilities exposed to interest rate movements
- its assets and liabilities denominated in foreign currencies which are exposed to currency risk

The Company's material market risk exposures relate to:

i. Spread risk
   - The Company's fixed income bond portfolio and collective investment undertaking portfolio as applicable, is exposed to spread risk where the values of the investments are sensitive to changes in the level or in the volatility of credit spreads

ii. Concentration risk
   - The Company's fixed income bond portfolio and collective investment undertaking portfolio as applicable, are exposed to concentration risk which is the sensitivity to an accumulation of exposures on single name counterparties

iii. Equity risk
   - The Company is exposed to equity risk through its investments in collective investment undertakings and structured notes as applicable

iv. Interest rate risk
   - The Company's fixed income bond portfolio and collective investment undertaking portfolio as applicable, drives the exposure to interest rate risk which arises from asset values being impacted by changes in interest rates
   - The valuation of technical provisions is also exposed to interest rate risk as the discount rates applied to projections are impacted by changes in interest rates

v. Currency risk
   - The majority of Company's business is conducted in Euro and hence the exposure to currency risk is low in the context of the business

There have been no material changes in the Company's market risk exposure in the reporting period.

Market Risk Concentrations

The following table provides information regarding the aggregated market risk exposure, based on credit quality step, relating to the Company's material credit risk concentrations at 31st December 2018 and at 31st December 2017.

Market Risk Exposures (EUR'000s) 31-Dec-18	Total	Credit Quality Step							
		0	1	2	3	4	5	6	9
Government Bonds	33,962	-	15,633	3,006	15,323	-	-	-	-
Corporate Bonds	205,826	6,833	26,082	89,670	83,241	-	-	-	-
Collective Investment Undertakings	55,244	-	-	-	-	-	-	-	55,244
Structured Notes	13,968	-	-	13,968	-	-	-	-	-
Total	**309,000**	**6,833**	**41,715**	**106,644**	**98,564**	**-**	**-**	**-**	**55,244**

Market Risk Exposures (EUR'000s) 31-Dec-17	Total	Credit Quality Step							
		0	1	2	3	4	5	6	9
Government Bonds	34,312	-	13,390	7,261	13,662	-	-	-	-
Corporate Bonds	169,816	6,986	20,563	74,020	68,247	-	-	-	-
Collective Investment Undertakings	123,554	-	-	1,988	-	-	-	-	121,566
Structured Notes	8,585	-	-	8,585	-	-	-	-	-
Total	**336,267**	**6,986**	**33,953**	**91,853**	**81,908**	**-**	**-**	**-**	**121,566**

The Company seeks to maximise stable return on its portfolio of assets without seeking to increase risk profile beyond its risk appetite. In executing the strategy, the Company is mindful of ongoing market risk, credit risk and liquidity (ALM) risk management.

C.2.2. Investments and Prudent Person Principle as applied to Market Risks

Darnell applies the prudent person principle when managing the Company's market risk exposure by adhering to the requirements of the Board approved investment policy which stipulates:

- minimum credit rating limits required for the investment portfolio
- maximum exposure allowed to any single counterparty and sector
- maximum exposure allowed in equity investments and structured products
- modified duration requirement for the investment portfolio
- requirements for asset and liability matching

C.2.3. Assessment and Risk Mitigation Techniques used for Market Risks

Darnell has implemented an effective process for assessing and mitigating market risk which includes the following key elements:

- By establishing an investment policy which includes the aim of maximising the performance of the Company's investment portfolio while hedging the liability profile of the company with suitable investments and minimising the risk of loss due to counterparty default. Key requirements of the investment policy include:
    - minimum credit rating limits required for the investment portfolio thus minimising spread risk and concentration risk
    - maximum exposure allowed to any single counterparty and sector to minimise concentration risk
    - maximum exposure allowed in equity investments thus minimising the exposure to equity risk
    - modified duration requirement for the investment portfolio
    - matching of foreign currency assets to the same currencies as the insurance liabilities thus minimising currency risk
- By establishing a Finance Committee with an appropriate representation of executive and non-executive directors which meets quarterly to review the investment performance and the investment strategy (including the asset allocation strategy)

- By engaging an Investment Manager to assist with implementing the investment strategy while respecting the constraints of the investment policy

The risk mitigation strategies and policies outlined above are reviewed quarterly by the Finance Committee and/or Board as required to ensure that they are still effective and appropriate for the risk profile of the Company.

There were no material changes to the strategies, policies and processes for mitigating this risk during this reporting period.

C.2.4. Risk Sensitivity for Market Risks

The Company carries out stress and scenario testing as part of the ORSA process which includes stress testing for deterioration in credit standing of fixed income bonds held, adverse valuations of fixed income bonds held, equity market distress and increases in interest rates. While a deterioration in the solvency position of the Company was observed from the results of these stresses the impact of the stresses would not be severe enough to impact on the Company's ability to continue to meet its solvency capital requirement in context of the level of solvency coverage of the Company at 31st December 2018.

C.3. Credit Risk

C.3.1. Material Credit Risks

Material Credit Risks

Darnell defines credit risk as the risk of loss, or of adverse change in the financial situation resulting from fluctuations in the credit standing of counterparties and any debtors Darnell is exposed.

Darnell has limited appetite for accepting credit risk which it recognises is a risk inherent in its business activities and cannot be fully eliminated. Darnell accepts exposure to credit risk to the extent that the acceptance of the risk optimises the business performance against objectives.

The Company's material credit risk exposures relate to:

i. Amounts due from cedants and intermediaries
ii. Amounts held on demand with banks

The following table provides information regarding the aggregated credit risk exposure, based on credit quality steps, relating to the Company's material credit risk exposures at 31st December 2018 and at 31st December 2017.

Credit Risk Exposure (EUR'000s) 31-Dec-18	Total	Credit Quality Step							
		0	1	2	3	4	5	6	9
Insurance & Intermediaries Receivable	25,333	-	1,495	23,838	-	-	-	-	-
Cash and Cash Equivalents	6,946	-	-	6,946	-	-	-	-	-
Total	**32,279**	**-**	**1,495**	**30,784**	**-**	**-**	**-**	**-**	**-**

Credit Risk Exposure (EUR'000s) 31-Dec-17	Total	Credit Quality Step							
		0	1	2	3	4	5	6	9
Insurance & Intermediaries Receivable	27,763	-	1,588	26,176	-	-	-	-	-
Cash and Cash Equivalents	3,543	-	-	3,543	-	-	-	-	-
Total	**31,306**	**-**	**1,588**	**29,719**	**-**	**-**	**-**	**-**	**-**

Refer to the comment included at section C.2.1 of the report on reduction in cash and cash equivalents during the year.

The table below presents the valuation of assets that are neither past due nor impaired, the ageing of assets that are past due but not impaired and assets that have been impaired at the reporting date. The factors considered in determining that the value of the assets have been impaired were; analysis of impairment, ageing of balance, past loss experience, current economic conditions and other relevant circumstances.

Aged Receivables (EUR'000s) 31-Dec-18	Total	Neither past due nor impaired	Past due more than 90 days	Past due and impaired
Insurance & Intermediaries Receivable	25,333	25,005	328	-

Aged Receivables (EUR'000s) 31-Dec-17	Total	Neither past due nor impaired	Past due more than 90 days	Past due and impaired
Insurance & Intermediaries Receivable	27,763	27,427	336	-

There were no material changes in the Company's credit risk exposure in the reporting period.

Credit Risk Concentration

The following table provides information regarding the aggregated credit risk exposure, based on counterparty exposure, relating to the Company's material credit risk concentrations at 31st December 2018 and at 31st December 2017.

Credit Risk Concentration (EUR'000s) 31-Dec-18	Total	BNP Paribas Group Company	Non-BNP Paribas Group
Insurance & Intermediaries Receivable	25,333	23,694	1,640
Cash and Cash Equivalents	6,946	6,946	-
Total	**32,279**	**30,640**	**1,640**

Credit Risk Concentration (EUR'000s) 31-Dec-17	Total	Neither past due nor impaired	Past due more than 90 days
Insurance & Intermediaries Receivable	27,763	23,363	4,400
Cash and Cash Equivalents	3,543	3,543	-
Total	**31,306**	**26,906**	**4,400**

C.3.2. Prudent Person Principle applied to Credit Risks

Darnell applies the prudent person principle when managing the Company's credit risk exposure to counterparties by only transacting with counterparties who hold strong credit ratings.

C.3.3. Assessment and Risk Mitigation Techniques used for Credit Risks

Darnell has implemented an effective process for assessing and mitigating credit risk which includes the following key elements:

- Credit risk exposure to (re)insurance counterparties is managed by adherence to the Board approved underwriting policy and retrocession policy as applicable.
- Credit risk exposure to financial institutions is managed by adherence to the Board approved investment policy
- The Company's exposure and credit ratings of external counterparties are continuously monitored by the Company's Underwriting Committee and Finance Committee as applicable.

The risk mitigation strategies and policies outlined above are reviewed quarterly by the Finance Committee and/or Board as required to ensure that they are still effective and appropriate for the risk profile of the Company.

There were no material changes to the strategies, policies and processes for managing this risk during the reporting period.

C.3.4. Risk Sensitivity for Credit Risks

Although credit risk is not a material risk for the Company, the sensitivity of the solvency ratio to credit rating downgrades of its counterparties has been assessed. This demonstrated marginal reductions in solvency cover when the credit quality step deteriorated by one step.

C.4. Liquidity Risk

C.4.1. Material Liquidity Risks

Material Liquidity Risks

Darnell defines liquidity risk as the risk of not being able to fund its cash flow requirements as they fall due arising from the company holding insufficient liquid or other financial resources.

The Company's exposure to liquidity risk is considered to be low as it maintains a high level of liquid assets to meet its liabilities. The strong liquidity position is maintained by applying an investment policy which seeks to maintain sufficient financial resources to meet its obligations when they fall due. This is achieved through hedging its liability profile with suitable investments to ensure it can meet its liabilities as they fall due.

The following tables provide information on the expected maturity of material financial assets and Statutory Accounts liabilities at 31st December 2018 and at 31st December 2017.

31-Dec-18				
Assets (EUR'000s)	**Total**	**Within 1 Year**	**1-5 Years**	**5+ Years**
Government Bonds	33,962	-	7,341	26,621
Corporate Bonds	205,826	9,100	76,954	119,772
Collective Investment Undertakings	55,244	55,244	-	
Structured Notes	13,968	-	13,968	
Insurance & Intermediaries Receivable	25,333	25,333	-	-
Receivables (trade, not insurance)	542	542	-	-
Cash and Cash Equivalents	6,946	6,946	-	-
Total	**341,821**	**97,165**	**98,263**	**146,393**

Liabilities (EUR'000s)	**Total**	**Within 1 Year**	**1-5 Years**	**5+ Years**
Insurance Contract Liabilities	118,481			118,481
Insurance & Intermediaries Payable	22,718	22,718	-	-
Payables (trade, not insurance)	658	658	-	-
Total	**141,857**	**23,376**	**-**	**118,481**

31-Dec-17				
Assets (EUR'000s)	**Total**	**Within 1 Year**	**1-5 Years**	**5+ Years**
Government Bonds	34,312	-	5,648	28,665
Corporate Bonds	169,816	7,941	66,630	95,244
Collective Investment Undertakings	123,554	123,554		-
Structured Notes	8,585	-	8,585	-
Derivatives	-	-	-	-
Insurance & Intermediaries Receivable	27,763	27,763	-	-
Receivables (trade, not insurance)	279	279	-	-
Cash and Cash Equivalents	3,543	3,543	-	-
Total	**367,852**	**163,080**	**80,863**	**123,909**

Liabilities (EUR'000s)	**Total**	**Within 1 Year**	**1-5 Years**	**5+ Years**
Insurance Contract Liabilities	99,589	-	-	99,589
Insurance & Intermediaries Payable	23,282	23,282	-	-
Payables (trade, not insurance)	386	386	-	-
Total	**123,257**	**23,668**	**-**	**99,589**

Refer to the comment included at section C.2.1 of the report on increase in collective investment undertakings and reduction in cash and cash equivalents during the year.

Liquidity Risk Concentrations

The Company does not have any material concentration of liquidity risk exposures.

C.4.2. Prudent Person Principle as applied to Liquidity Risks

Darnell applies the prudent person principle when managing the Company's liquidity risk by:

- ensuring that the investment portfolio is composed entirely of marketable securities at all times
- ensuring a sizeable level of funding is maintained as cash in bank accounts at all times taking account of the monthly cashflow forecasts prepared to predict required liquidity levels over both the short and medium term

C.4.3. Assessment and Risk Mitigation Techniques used for Liquidity Risks

Darnell has no appetite for liquidity risk and being unable to meet liabilities as they fall due and has implemented an effective process for managing liquidity risk which includes the following key elements:

- By hedging the liability profile of the Company with suitable investments which ensures that it has sufficient access to liquidity to meet its obligations as they fall due.
- By ensuring that the investment portfolio is composed entirely of marketable securities at all times
- A sizeable level of funding is maintained as cash in bank accounts at all times
- As set out in section C.4.4 of this report the Company recognises a material amount of expected profit included in future premiums in the Solvency II technical provisions. However, in managing liquidity risk the Company only considers the level of claims provisions booked in its Statutory Accounts when developing its ALM strategy.

The risk mitigation strategies and policies outlined above are reviewed on a quarterly basis by the Finance Committee and/or Board as required to ensure that they are still effective and appropriate for the risk profile of the Company.

There were no material changes to the strategies, policies and processes for managing this risk during the reporting period.

C.4.4. Expected Profit included in Future Premiums

At 31st December 2018 the expected profit included in future premiums ("EPIFP") is EUR98.88m (31st December 2017 EUR105.7m).

The reduction in EPIFP in the reporting period is based on the most recent projections reflecting the current status of the run-off and all related commercial aspects of one of the main reinsurance treaties of the Company.

C.4.5. Risk Sensitivity for Liquidity Risks

Given that liquidity is not a material risk for the Company; no specific risk sensitivity is provided.

C.5. Operational Risk

C.5.1. Material Operational Risks

Material Operational Risks

Darnell defines operational risk as the risk of loss resulting from inadequate or failed processes, people and systems or from external events (whether deliberate, accidental or triggered by natural occurrence).

Darnell has limited appetite for accepting operational risk which it recognises is a risk inherent in its business activities and cannot be fully eliminated. The Company's material operational risk exposures relate to:

i. Outsourcing - risk of failure, non-performance, ineffective management and/or oversight of an outsourced service provider
ii. Execution, Delivery and Process Management - risk to a service provision arising from a failure to carry out operational processes in an accurate, timely and complete manner
iii. People - risk of inadequate recruitment practices, development, management or retention of employees
iv. Data Quality – risk that the Company does not appropriate processes and procedures to ensure the accuracy, completeness and appropriateness of data received from cedants and used by the Company

There were no material changes in the Company's operational risk exposure in the reporting period.

Operational Risk Concentrations

The Company does not have any material concentration of operational risk exposures.

C.5.2. Assessment and Risk Mitigation Techniques used for Operational Risks

Darnell has implemented an effective process for managing operational risk:

- by establishing an internal control system that covers all activities for which the Company is responsible which includes activities carried out by all departments of Darnell and activities outsourced by the Company to a third party
- by ensuring that the internal control processes of Darnell are aligned with the key policies and procedures established and implemented by the Company. These key policies and procedures and internal control processes are regularly reviewed to ensure a continuous improvement.

There were no material changes to the strategies, policies and processes for managing this risk during the reporting period.

C.5.3. Risk Sensitivity for Operational Risks

During the ORSA process a qualitative assessment of material operational risks is carried out by assessing the impact of a number of scenarios that could impact on the Company. The assessment allowed the Company to review and validate the risk mitigation plans and contingency plans that are in place.

C.6. Other Material Risks

Compliance Risk

Darnell defines compliance risk as the risk of legal, administrative or disciplinary sanctions, together with the financial loss that the company may suffer as a result of its failure to comply with all the

laws, regulations, codes of conduct and standards of good practice applicable to insurance and financial activities (including instructions given by the Board, particularly in application of guidelines issued by a supervisory body).

Darnell has no appetite for failure to comply with legal or regulatory requirements and has implemented an effective process for managing compliance risk which includes the following key elements:

- By established a compliance function with an appointed Head of Compliance
- By ensuring that intended compliance activities are set out in an annual compliance plan prepared by the Head of Compliance which is reported on at each quarterly Board meeting
- By engaging an external tax advisory firm to assist and advice Darnell with ongoing tax compliance matters. In addition specific tax reviews and studies are carried out, with the assistance of expert advisors, on specific tax topics as required.

Strategic Risk

The Company defines strategic risk as the risk arising from changes in its business environment including macro-economic factors and industry specific considerations and from adverse or improper implementation of business decisions leading to a failure to manage business performance against objectives. Strategic risk is managed through the Board's on-going oversight of Company strategy and its development.

C.7. Any Other Information

There is no other information to disclose.

D. VALUATION FOR SOLVENCY PURPOSES

D.1. Assets

D.1.1. Solvency II Valuation for each Material Class of Asset

The following table presents a summary of the Solvency II valuation of each material class of asset compared to the Statutory Accounts at 31st December 2018 and at 31st December 2017.

Assets EUR'000s	31-Dec-18			31-Dec-17		
	Solvency II Valuation	Statutory Accounts Valuation	Difference	Solvency II Valuation	Statutory Accounts Valuation	Difference
Government Bonds	33,962	32,875	1,087	34,312	32,650	1,662
Corporate Bonds	205,826	205,192	634	169,816	163,254	6,562
Collective Investment Undertakings	55,244	55,244	-	123,554	123,554	-
Structured Notes	13,968	13,968	-	8,585	8,585	-
Insurance and Intermediaries receivables	25,333	25,333	-	27,763	27,763	-
Receivables (trade, not insurance)	542	542	-	279	279	-
Cash and cash equivalents	6,946	6,946	-	3,543	3,543	-
Any other assets, not elsewhere shown	-	1,854	(1,854)	-	1,556	(1,556)
Total Assets	**341,821**	**341,954**	**(133)**	**367,852**	**361,183**	**6,668**

Refer to section 3.1 of this report for a commentary on the reduction in cash and cash equivalents and increase in collective investment undertakings on the Solvency II Balance Sheet at 31st December 2018 compared to 2017.

The following describes the bases, methods and main assumptions used by the Company for the valuation of assets for solvency purposes:

- Government Bonds & Corporate Bonds
  - Government and corporate bonds held are quoted investments, valued in an active market with daily prices and liquidity available.
  - As these are publicly traded securities, the market prices are readily available and are actively traded, details of which are provided to the Company in a statement from the Investment Manager.
  - No significant estimates or judgements are used in the valuation of these investments.

- Collective Investment Undertakings
  - Collective investment undertakings held are externally-managed funds that are quoted investments, valued in an active market with daily prices and liquidity available.
  - As these are publicly traded securities, the market prices are readily available and are actively traded, details of which are provided to the Company in a statement from the Fund Manager.
  - No significant estimates or judgements are used in the valuation of these investments.

- Structured Notes
  - Structured notes held are quoted investments, valued in an active market with daily prices and liquidity available.
  - As these are publicly traded securities, the market prices are readily available and are actively traded, details of which are provided to the Company in a statement from the Investment Manager.

- No significant estimates or judgements are used in the valuation of these investments.

- Insurance & Intermediaries Receivable
  - Insurance and intermediaries receivable balances represent amounts due from cedant undertakings.
  - The amounts receivable are recognised and carried at original invoice amount less an allowance for any uncollectible items, which is the fair value of the consideration to be received in the future.
  - Due to the short-term nature of the receivable there are no significant estimates or judgements used in the valuation of these assets.

- Receivables (trade, not insurance)
  - Receivables (trade, not insurance) are carried at cost, which is the fair value of the consideration to be received in the future.
  - No significant estimates or judgements are used in the valuation of these investments.

- Cash and cash equivalents
  - Cash and cash equivalents represent balances held in bank accounts at the BNP Paribas Group.
  - Cash and cash equivalents are valued at fair value by the relevant financial institution, and the Company receives statements to confirm the balances held.
  - No significant estimates or judgements are used in the valuation of these investments.

The Company:
- Does not recognise deferred tax assets
- Does not recognise intangible assets
- Does not have financial and operating leases

There were no changes to the recognition and valuation bases used by the Company for the valuation of assets for solvency purposes during the reporting period.

D.1.2. Solvency II and Statutory Accounts Valuation Differences by Material Class of Assets

Referring to the table at section D.1.1 above there are no differences between Solvency II valuation and Statutory Accounts valuation of assets apart from the following:

- Government Bonds & Corporate Bonds
  - For Solvency II government bonds and corporate bonds held are valued at market consistent values using quoted prices in an active market.
  - For the Statutory Accounts government bonds and corporate bonds held are valued at amortised cost using the effective interest method.
  - Note that for the Statutory Accounts accrued interest on government bonds and corporate bonds is reported as 'Any other assets, not elsewhere shown'. For Solvency II this accrued interest amount is not reported as a separate item but included in the overall valuation of the government bonds and corporate bonds reported.

D.2. Technical Provisions

D.2.1. Solvency II Valuation of Technical Provisions for each Material Line of Business

The table below presents the valuation of technical provisions for each material line of business as defined by Solvency II, at 31st December 2018 and at 31st December 2017.

Technical Provisions (EUR'000s) 31-Dec-18	Life Reinsurance Obligations		Total Life Reinsurance Obligations	Non-Life Accepted Proportional Reinsurance		Non-Life Accepted Non-Proportional	Total Non-Life Obligations	Total
	Life Reinsurance	Heath Reinsurance		Miscellaneous Financial Loss	Motor Vehicle Liability Insurance	Casualty		
Best Estimate	(138,188)	211,814	73,626	1,465	4,914	5,110	11,489	85,115
Risk Margin	12,510	13,921	26,431	4,388	1,243	1,304	6,935	33,366
Total Net Technical Provisions	**(125,678)**	**225,735**	**100,057**	**5,853**	**6,157**	**6,414**	**18,424**	**118,481**

Technical Provisions (EUR'000s) 31-Dec-17	Life Reinsurance Obligations		Total Life Reinsurance Obligations	Non-Life Accepted Proportional Reinsurance		Non-Life Accepted Non-Proportional	Total Non-Life Obligations	Total
	Life Reinsurance	Heath Reinsurance		Miscellaneous Financial Loss	Motor Vehicle Liability Insurance	Casualty		
Best Estimate	(137,630)	209,130	71,500	4,022	4,692	907	9,621	81,121
Risk Margin	14,593	16,302	30,895	5,638	1,384	1,198	8,220	39,115
Total Net Technical Provisions	**(123,037)**	**225,432**	**102,395**	**9,660**	**6,076**	**2,105**	**17,841**	**120,236**

The increase in technical provisions at 31st December 2018 compared to 2017 is mainly driven by:

- Run-off of one of the main reinsurance treaties of the Company resulting in an unwind of the negative premium provision.

The valuation of technical provisions for solvency purposes is determined as follows:

1) Calculation of the Best Estimate Liabilities
   - The best estimate liabilities comprise of the claims provision and premium provision.
     i. The claims provision is the discounted best estimate of cash flows relating to past claim events that occurred before the valuation date, whether reported or not. The cash flows include future cash flows resulting from past claims events.
     ii. The premium provision is the discounted best estimate of cash flows relating to future claim events that have not yet occurred, but that are covered by existing and legally binding pre-inception contracts.
2) Calculation of a Risk Margin
   - The risk margin is included to ensure that the value of the technical provisions is equivalent to the amount that would be expected to have to be paid to a third party insurance company in order to take over and meet the insurance obligations of the Company.

D.2.2. Solvency II and Statutory Accounts Valuation Differences of Technical Provisions

The following table presents a summary of the Solvency II valuation of technical provisions compared to the Statutory Accounts at 31st December 2018 and at 31st December 2017.

Technical Provisions EUR'000s	31-Dec-18			31-Dec-17		
	Solvency II Valuation	Statutory Accounts Valuation	Difference	Solvency II Valuation	Statutory Accounts Valuation	Difference
Technical provisions – non-life	**18,424**	**14,119**	**4,305**	**17,841**	**13,233**	**4,608**
Best Estimate	11,489			9,621		
Risk margin	6,935			8,220		
Technical provisions – life (excluding health)	**(125,678)**	**25,041**	**(150,719)**	**(123,037)**	**27,546**	**(150,582)**
Best Estimate	(138,188)			(137,630)		
Risk margin	12,510			14,593		
Technical provisions - health (similar to life)	**225,735**	**152,852**	**72,883**	**225,432**	**158,233**	**67,199**
Best Estimate	211,814			209,130		
Risk margin	13,921			16,302		
Total Technical Provisions	**118,481**	**192,012**	**(73,531)**	**120,236**	**199,011**	**(78,775)**

Refer to section D.2.1 above for commentary on the increase in Solvency II technical provisions during 2018.

For the valuation of technical provisions for solvency purposes adjustments are applied to the Statutory Accounts technical provisions including:

a) Future premiums and associated cashflows are allowed for within the contract boundary
   - Within the contract boundary assessed for the Company's treaties all future premiums expected to be received (and associated outwards cashflows) are considered in the best estimate liability calculation. An obligation is only derecognised when it is extinguished, discharged, cancelled or expires.
   - Allowance is made for future policyholder behaviour, such as the likelihood of policyholder cancellation during policy term. Therefore, the premium cashflows include allowances for lapses from cancellations and death.
   - Claims cashflows relating to future exposure periods are estimated by applying a loss ratio to future premium cashflows. Loss ratio assumptions are based on historic loss ratio experience arising from an annual claims provision analysis and monitored quarterly for emerging claims experience during the year.

b) Events Not in the Data ("ENID's") are allowed for within the best estimate
   - The calculation of best estimate liabilities should take into account all expected future developments that would have a material impact on the cash inflows and outflows required to settle the insurance obligations, not just those implied from the existing data. Using historic data to calculate the best estimate will only allow for the scale of events that have been observed within the history. This can leave a gap to the basis for technical provisions expected under Solvency II.
   - The inclusion of a binary event/ ENID loading ensures consideration of possible events not observed in the historic data.
   - Explicit judgemental loadings are applied to the claims and premium provisions to reflect the uncertainties in the data, emerging actual claims experience and the model uncertainty from applying an aggregate model point approach compared to a policy by policy approach for calculating the technical provisions.

c) Expenses are included on a going concern basis
   - The valuation of technical provisions takes into account all future expense cashflows incurred in servicing the contracts underlying the claims and premium provisions
   - For Darnell expenses include the total future cost of operational expenditure to run off the portfolio of existing liabilities. All other expenses other than operational expenditure are contractually defined between Darnell and the cedants and they are included in the calculation of expected profit in future premium.

- An explicit allowance has been made for inflation in the expenses which have been allocated to lines of business by claims provision i.e. on a pro-rata basis.

d) Discounting using prescribed EIOPA yield curves
   - Both claims and premium provisions cashflows are modelled using payment patterns derived from historic experience.
   - These cash flows are discounted by the yield curves as published by EIOPA corresponding to each valuation date.

e) Risk margin is included
   - The risk margin is calculated without simplification.
   - Each component of the SCR is calculated at each future date assuming no future business is written. All market risk is assumed to be hedgeable.
   - This is then discounted using the year end 2017 yield curve and a 6% cost of capital is applied.
   - Risk margin is allocated to individual lines of business pro rata to the year end 2017 Underwriting SCR.

There were no changes to the recognition and valuation bases used by the Company for the valuation of technical provisions for solvency purposes during the reporting period.

The Company does not apply the:
- matching adjustment referred to in Article 77b of Directive 2009/138/EC
- volatility adjustment referred to in Article 77d of Directive 2009/138/EC
- transitional risk-free interest rate-term structure referred to Article 308c of Directive 2009/138/EC
- transitional deduction referred to in Article 308d of Directive 2009/138/EC

The Company has no recoverable from reinsurance contracts and special purpose vehicles.

The Company does not offer any products with future discretionary benefits therefore no adjustments for any loss absorbing capacity of technical provisions need to be considered. As a consequence, gross and net calculations of the Solvency Capital Requirement are identical.

The following summarises the level of uncertainty associated with the value of technical provisions:
- Uncertainty relates primarily to how future actual experience will differ from the best estimate assumptions used to calculate the technical provisions.
- ENIDs – estimating a provision for ENIDs is subject to uncertainty as there could be insufficient allowance made for emerging trends or events which will not be present in the historic claims data used as the basis for future cash flows.

D.3. Other liabilities

D.3.1. Solvency II Valuation for each Material Class of Other Liabilities

The following table presents a summary of the Solvency II valuation of each material class of other liabilities compared to the statutory financial statements at 31st December 2018 and at 31st December 2017.

Other Liabilities EUR'000s	31-Dec-18			31-Dec-17		
	Solvency II Valuation	Statutory Accounts Valuation	Difference	Solvency II Valuation	Statutory Accounts Valuation	Difference
Deferred tax liabilities	9,358	163	9,195	11,007	327	10,680
Insurance & intermediaries payables	22,718	22,718	-	23,282	23,282	-
Payables (trade, not insurance)	658	658	-	978	978	-
Total Other Liabilities	**32,734**	**23,539**	**9,195**	**35,267**	**24,587**	**10,680**

The following describes the bases, methods and main assumptions used by the Company for the valuation of other liabilities for solvency purposes:

- Deferred tax liabilities
  - Deferred tax liabilities are recognised on all timing differences that have originated at the balance sheet date where transactions or events that result in an obligation to pay more tax in the future or a right to pay less tax in future have occurred at the balance sheet date.
  - Deferred Tax is measured at the tax rates that are expected to apply in the years in which the timing differences are expected to reverse based on tax rates and laws that have been enacted or substantially enacted by the balance sheet date.
  - No significant estimates or judgements are used in the valuation of these liabilities.

- Insurance & intermediaries payables
  - Insurance and intermediaries payable balances represent amounts due to cedant undertakings.
  - The amounts payable are recognised and carried at original invoice amount which is the fair value of the consideration to be paid in the future.
  - No significant estimates or judgements are used in the valuation of these liabilities.

- Payables (trade, not insurance)
  - Payables (trade, not insurance) are carried at cost, which is the fair value of the consideration to be paid in the future for goods and services received, whether or not invoiced to the Company.
  - No significant estimates or judgements are used in the valuation of these liabilities.

The Company is not exposed to:

- Liabilities for financial and operating leases
- Liabilities for employee benefits

D.3.2. Solvency II and Statutory Accounts Valuation Differences by Material Class of Other Liabilities

Referring to the table at section D.3.1 above there are no differences between Solvency II valuation and Statutory Accounts valuation of other liabilities apart from the following:

- Deferred tax liabilities
  - There is no difference in the methodology used for the valuation of deferred tax liability on both a Solvency II and Statutory Accounts basis.
  - However, note that the deferred tax liability on a Solvency II basis increases due to the difference in the valuation of assets and technical provisions as presented in sections D.1. and D.2. above.

D.4. Alternative methods for valuation

The Company does not use any alternative methods for valuation.

D.5. Any other information

Refer to the appendix 2 of this report for the following quantitative reporting templates:

- S.02.01.02 - Balance Sheet
- S.05.01.02 - Premiums, claims and expenses by line of business
- S.05.02.01 - Premiums, claims and expenses by country
- 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

There is no other material information regarding the valuation of assets and liabilities for solvency purposes.

E. CAPITAL MANAGEMENT

E.1. Own funds

E.1.1. Information on the Objectives, Policies and Processes for Managing Own Funds

Capital Management Objective

Darnell seeks at all times to hold sufficient eligible capital:

- to meet its current and projected business activities
- to ensure it can continue its business on a going concern basis
- to comply with the regulatory requirements set by the CBI
- to maximise the return to its sole shareholder

The Board has determined for its risk appetite that Darnell should always hold own funds at a higher level than the Solvency Capital Requirement to ensure that the Company is always holding surplus own funds.

Dividends

As part of its capital management strategy the Company considers on an annual basis its ability to pay a dividend to its sole shareholder, BNP Paribas Ireland Unlimited Company.

The dividend policy of the Company is to pay on an annual basis a dividend corresponding to the retained earnings of its statutory accounts at the previous year end. A dividend 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 acceptable risk appetite tolerance limit for solvency margin cover.

Prior to declaring any dividends, the Company will obtain the necessary approvals from its Board and Shareholder as required.

Monitoring and Reporting

Darnell's solvency position is assessed at each quarter end and reported to Management, Risk Committee and the Board of Directors.

The Company's Board approved risk appetite statement contains a trigger monitoring and reporting framework based on risk appetite tolerance limits (acceptable, warning, immediate action and material deviation) which is used to signal activities and the escalation of reporting requirements. The risk appetite statement contains tolerance limits for solvency margin cover.

As part of its annual Own Risk and Solvency Assessment the Board considers the following over the business planning time horizon of 3 years:

- the capital management plan
- the application of the dividend policy
- the scenarios that could trigger it seeking capital from its sole shareholder

E.1.2. Own Funds classified by Tiers

The table below presents own funds at 31st December 2018 by tiers. All the Company's own funds are classified as tier 1 unrestricted.

Tier 1 Unrestricted - Own Funds EUR'000s	Opening Balance at 01/01/2018	Movement in Period	Closing Balance at 31/12/2018
Ordinary Share Capital	21,251	-	21,251
Share premium account related to ordinary share capital	78,066	-	78,066
Reconciliation Reserve	113,031	(21,741)	91,290
Total Tier 1 Unrestricted Own Funds	**212,349**	**(21,741)**	**190,607**

The following table summarises the movement in the reconciliation reserve of EUR21.74m in the period.

Movement in Reconciliation Reserve in Period EUR'000s	
Dividend paid in 2018	(32,000)
Retained earnings for year ended 31/12/2018	20,818
Other differences in the period on the valuation of assets, technical provisions and other liabilities on the adjustment from the Statutory Accounts to Solvency II for solvency purposes	(10,559)
Movement in Reconciliation Reserve	**(21,741)**

E.1.3. Eligibility of Own Funds

The Company's own funds are all classified as tier 1 unrestricted and are fully available to cover the Solvency Capital Requirement and Minimum Capital Requirement.

None of the Company's own fund items are subject to transitional arrangements and the Company has no ancillary own funds. No deductions are applied to own funds items and there are no restrictions affecting their availability and transferability.

E.1.4. Material difference between Equity as shown in the Financial Statements and the Excess of Assets over Liabilities calculated for solvency purposes

The table below presents the material difference between equity as shown in the financial statements prepared on an Irish GAAP basis and the excess of assets over liabilities calculated for solvency purposes at 31st December 2018.

Own Funds 31st December 2018 EUR'000s	Statutory Accounts Balance Sheet Equity	Adjustments for Solvency Purposes	Solvency II Balance Sheet Excess of Assets over Liabilities
Ordinary Share Capital	21,251	-	21,251
Share premium account related to ordinary share capital	78,066	-	78,066
Retained Earnings	27,086	-	27,086
Difference in the valuation of assets	-	(133)	(133)
Difference in the valuation of technical provisions	-	73,531	73,531
Difference in the valuation of other liabilities	-	(9,195)	(9,195)
Total	**126,403**	**64,204**	**190,607**

Reconciliation Reserve

The table below presents the reconciliation reserve which comprises the excess of assets over liabilities of the Solvency II Balance Sheet less issued share capital and related share premium account.

Reconciliation Reserve (EUR'000s)	Dec-18
Solvency II Balance Sheet - Excess of assets over liabilities	190,607
Ordinary Share Capital	(21,251)
Share premium account related to ordinary share capital	(78,066)
Reconciliation Reserve	**91,290**
Represented by	
Difference in the valuation of assets	(133)
Difference in the valuation of technical provisions	73,531
Difference in the valuation of other liabilities	(9,195)
Retained earnings from Statutory Accounts	27,086
Reconciliation Reserve	**91,290**

Adjustment for Solvency Purposes

The following summarises the adjustment for solvency purposes of EUR66.4m above:

- Difference in valuation of assets of EUR0.1m
  - Refer to section D.1. of this report
- Difference in valuation of technical provisions of EUR73.5m
  - Refer to section D.2. of this report
- Difference in valuation of other liabilities of (EUR9.2m)
  - Refer to section D.3. of this report

E.2. Solvency Capital Requirement and Minimum Capital Requirement

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

The table below presents the Solvency Capital Requirement and Minimum Capital Requirement at 31st December 2018 and at 31st December 2017.

Capital Requirement (EUR'000s)	Dec-18	Dec-17
Solvency Capital Requirement	105,728	108,746
Minimum Capital Requirement	26,432	27,187

The reduction in Solvency Capital Requirement and Minimum Capital Requirement is expected due to the continued run-off of one of the main reinsurance treaties of the Company.

E.2.2. Solvency Capital Requirement split by Risk Modules

The table below presents the Solvency Capital Requirement at 31st December 2018 and at 31st December 2017 split by risk modules.

Risk Modules (EUR'000s)	Dec-18	Dec-17
Market Risk	39,396	33,827
Counterparty Default Risk	833	1,200
Life Underwriting Risk	46,588	56,686
Health Underwriting Risk	66,875	63,324
Non-Life Underwriting Risk	23,232	26,553
Diversification	(62,606)	(65,522)
Basic Solvency Capital Requirement	**114,318**	**116,068**
Operational Risk	6,514	8,213
Loss Absorbing Capacity of Deferred Taxes	(15,104)	(15,535)
Solvency Capital Requirement	**105,728**	**108,746**

The reduction in Solvency Capital Requirement is expected due to the continued run-off of one of the main reinsurance treaties of the Company.

Undertaking specific parameters or simplified calculations are not used for any of the risk modules or sub-modules.

E.2.3. Inputs used to calculate the Minimum Capital Requirement

The table below shows the inputs into the Minimum Capital Requirement calculation as at 31st December 2018 and at 31st December 2017.

31-Dec-18		
Inputs to Non-Life MCR Calculation EUR'000s	**Net (of reinsurance/SPV) best estimate**	**Net (of reinsurance) written premiums in the last 12 months**
Motor vehicle liability insurance and proportional reinsurance	4,914	6,140
Miscellaneous financial loss insurance and proportional reinsurance	1,465	26,322
Non-proportional casualty reinsurance	5,111	1,887

Inputs to Life MCR Calculation EUR'000s	**Net (of reinsurance / SPV) best estimate and TP calculated as a whole**	**Net (of reinsurance / SPV) total capital at risk**
Other life (re)insurance and health (re)insurance obligations	73,626	
Total capital at risk for all life (re)insurance obligations		12,861,017

Overall MCR Calculation	**EUR'000s**
Linear MCR	16,278
SCR	105,728
MCR cap	47,577
MCR floor	26,432
Combined MCR	26,432
Absolute floor of the MCR	3,600
Minimum Capital Requirement	**26,432**

31-Dec-17		
Inputs to Non-Life MCR Calculation EUR'000s	**Net (of reinsurance/SPV) best estimate**	**Net (of reinsurance) written premiums in the last 12 months**
Motor vehicle liability insurance and proportional reinsurance	4,692	7,114
Miscellaneous financial loss insurance and proportional reinsurance	4,022	29,950
Non-proportional casualty reinsurance	907	1,853

Inputs to Life MCR Calculation EUR'000s	**Net (of reinsurance / SPV) best estimate and TP calculated as a whole**	**Net (of reinsurance / SPV) total capital at risk**
Other life (re)insurance and health (re)insurance obligations	71,500	
Total capital at risk for all life (re)insurance obligations		16,298,882

Overall MCR Calculation	**EUR'000s**
Linear MCR	18,845
SCR	108,746
MCR cap	48,936
MCR floor	27,187
Combined MCR	27,187
Absolute floor of the MCR	3,600
Minimum Capital Requirement	**27,187**

E.2.4. Material Changes to the Solvency Capital Requirement and to the Minimum Capital Requirement

During the reporting period the Solvency Capital Requirement and Minimum Capital Requirement have reduced as presented in section E.2 of this report. This is expected due to the continued run-off of one of the main reinsurance treaties of the Company. The Board continue to actively monitor the projected run-off of this treaty to ensure that no material deviation occurs from what is expected.

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

Darnell uses the Standard Formula to calculate its Solvency Capital Requirement and Minimum Capital Requirement and does not use the duration-based equity risk sub-module in the calculation of the Solvency Capital Requirement.

E.4. Differences between the Standard Formula and any Internal Model Used

Darnell uses the Standard Formula, and not an internal model, to calculate its Solvency Capital Requirement and Minimum Capital Requirement.

E.5. Solvency Capital Requirement

There were no instances of non-compliance with the Minimum Capital Requirement and the Solvency Capital Requirement for Darnell during the reporting period ended 31st December 2018.

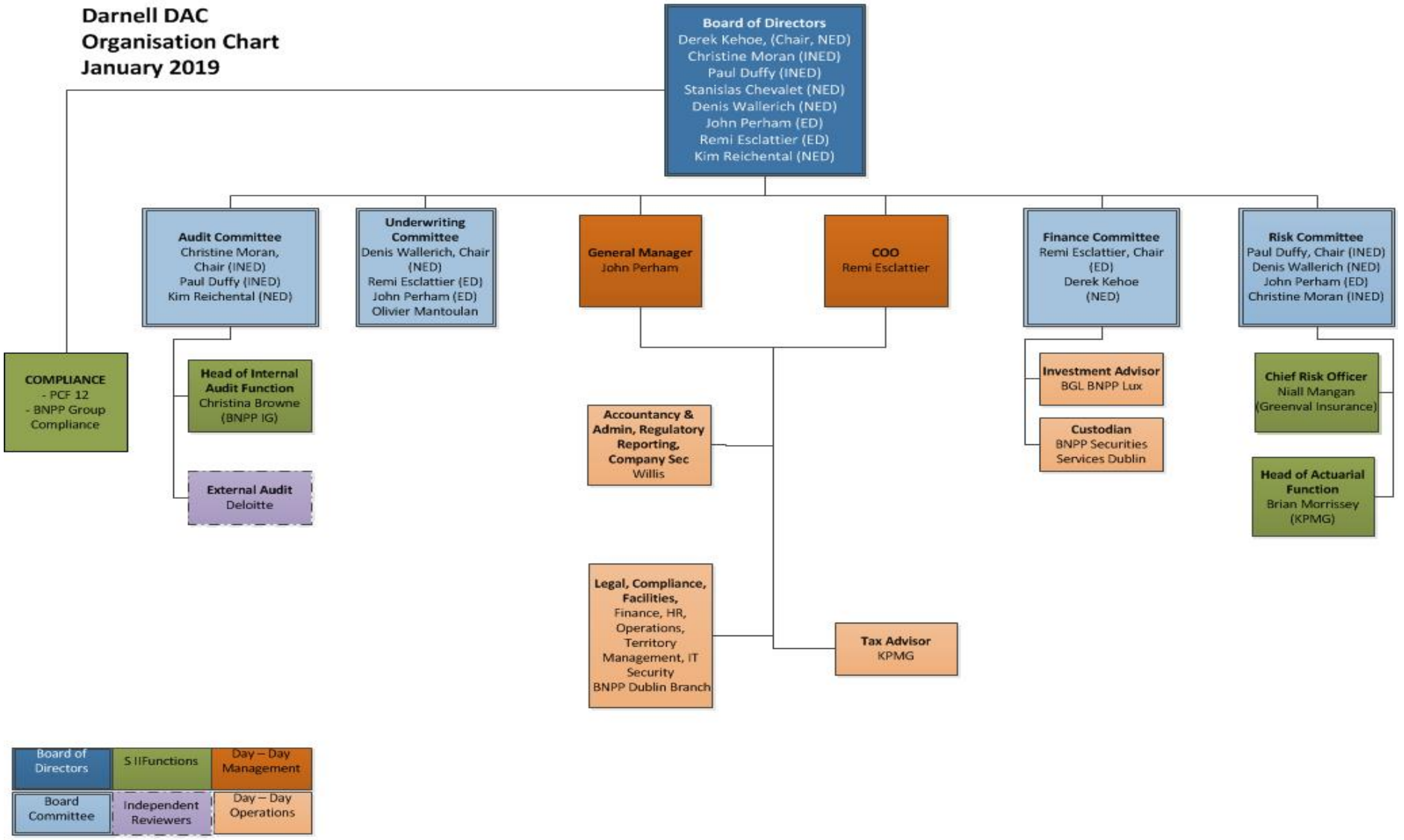
E.6. Any other information

There is no other material information regarding the capital management of Darnell that has not been disclosed in section E above.

Refer to the appendix 2 to this report for the following quantitative reporting templates:

- S.23.01.01 – Own Funds
- S.25.01.21 - Solvency Capital Requirement - for undertakings on Standard Formula
- S.28.01.01 - Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity

APPENDIX 1 – DARNELL ORGANISATION CHART



APPENDIX 2 – QUANTITATIVE REPORTING TEMPLATES 31st DECEMBER 2018

S.02.01.02
Balance sheet (EUR'000s)

		Solvency II value
Assets		**C0010**
Intangible assets	**R0030**	-
Deferred tax assets	**R0040**	-
Pension benefit surplus	**R0050**	-
Property, plant & equipement held for own use	**R0060**	-
Investments (other than assets held for index-linked and unit-linked contracts)	**R0070**	309,000
Property (other than for own use)	**R0080**	-
Holdings in related undertakings, including participations	**R0090**	-
Equities	**R0100**	-
Equities - listed	**R0110**	-
Equities - unlisted	**R0120**	-
Bonds	**R0130**	253,756
Government Bonds	**R0140**	33,962
Corporate Bonds	**R0150**	205,826
Structured notes	**R0160**	13,968
Collateralised securities	**R0170**	-
Collective Investments Undertakings	**R0180**	55,244
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**	-
Loans on policies	**R0240**	-
Loans and mortgages to individuals	**R0250**	-
Other loans and mortgages	**R0260**	-
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**	25,333
Reinsurance receivables	**R0370**	-
Receivables (trade, not insurance)	**R0380**	542
Own shares (held directly)	**R0390**	-
Amounts due in respect of own fund items or initial fund called up but not yet	**R0400**	-
Cash and cash equivalents	**R0410**	6,946
Any other assets, not elsewhere shown	**R0420**	-
Total assets	**R0500**	**341,821**

S.02.01.02
Balance sheet (EUR'000s)

		Solvency II value
Liabilities		**C0010**
Technical provisions – non-life	**R0510**	18,424
Technical provisions – non-life (excluding health)	**R0520**	-
TP calculated as a whole	**R0530**	-
Best Estimate	**R0540**	11,490
Risk margin	**R0550**	6,935
Technical provisions - health (similar to non-life)	**R0560**	-
TP calculated as a whole	**R0570**	-
Best Estimate	**R0580**	-
Risk margin	**R0590**	-
Technical provisions - life (excluding index-linked and unit-linked)	**R0600**	100,057
Technical provisions - health (similar to life)	**R0610**	225,735
TP calculated as a whole	**R0620**	-
Best Estimate	**R0630**	211,814
Risk margin	**R0640**	13,921
Technical provisions – life (excluding health and index-linked and unit-linked)	**R0650**	(125,678)
TP calculated as a whole	**R0660**	-
Best Estimate	**R0670**	(138,188)
Risk margin	**R0680**	12,510
Technical provisions – index-linked and unit-linked	**R0690**	-
TP calculated as a whole	**R0700**	-
Best Estimate	**R0710**	-
Risk margin	**R0720**	-
Contingent liabilities	**R0740**	-
Provisions other than technical provisions	**R0750**	-
Pension benefit obligations	**R0760**	-
Deposits from reinsurers	**R0770**	-
Deferred tax liabilities	**R0780**	9,357
Derivatives	**R0790**	-
Debts owed to credit institutions	**R0800**	-
Financial liabilities other than debts owed to credit institutions	**R0810**	-
Insurance & intermediaries payables	**R0820**	22,718
Reinsurance payables	**R0830**	-
Payables (trade, not insurance)	**R0840**	658
Subordinated liabilities	**R0850**	-
Subordinated liabilities not in BOF	**R0860**	-
Subordinated liabilities in BOF	**R0870**	-
Any other liabilities, not elsewhere shown	**R0880**	-
Total liabilities	**R0900**	**151,214**
Excess of assets over liabilities	**R1000**	**190,607**

S.05.01.02
Premiums, claims and expenses by line of business (EUR'000s)

		Line of Business for: **non-life insurance and reinsurance obligations (direct business and accepted proportional**								
		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**	-	-	-	-	-	-	-	-	-
Gross - Proportional reinsurance accepted	**R0120**	-	-	-	6,159	-	-	-	-	-
Gross - Non-proportional reinsurance accepted	**R0130**									
Reinsurers' share	**R0140**	-	-	-	-	-	-	-	-	-
Net	**R0200**	-	-	-	6,159	-	-	-	-	-
Premiums earned										
Gross - Direct Business	**R0210**	-	-	-	-	-	-	-	-	-
Gross - Proportional reinsurance accepted	**R0220**	-	-	-	6,159	-	-	-	-	-
Gross - Non-proportional reinsurance accepted	**R0230**									
Reinsurers' share	**R0240**	-	-	-	-	-	-	-	-	-
Net	**R0300**	-	-	-	6,159	-	-	-	-	-
Claims incurred										
Gross - Direct Business	**R0310**	-	-	-	-	-	-	-	-	-
Gross - Proportional reinsurance accepted	**R0320**	-	-	-	4,132	-	-	-	-	-
Gross - Non-proportional reinsurance accepted	**R0330**									
Reinsurers' share	**R0340**	-	-	-	-	-	-	-	-	-
Net	**R0400**	-	-	-	4,132	-	-	-	-	-
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**	-	-	-	1,768	-	-	-	-	-
Other expenses	**R1200**									
Total expenses	**R1300**									

S.05.01.02

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

		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**	-	-	-					-
Gross - Proportional reinsurance accepted	**R0120**	-	-	26,243					32,402
Gross - Non-proportional reinsurance accepted	**R0130**				-	1,947	-	-	1,947
Reinsurers' share	**R0140**	-	-	-	-	-	-	-	-
Net	**R0200**	-	-	26,243	-	1,947	-	-	34,349
Premiums earned									
Gross - Direct Business	**R0210**	-	-	-					-
Gross - Proportional reinsurance accepted	**R0220**	-	-	26,657					32,816
Gross - Non-proportional reinsurance accepted	**R0230**				-	1,947	-	-	1,947
Reinsurers' share	**R0240**	-	-	-	-	-	-	-	-
Net	**R0300**	-	-	26,657	-	1,947	-	-	34,763
Claims incurred									
Gross - Direct Business	**R0310**	-	-	-					-
Gross - Proportional reinsurance accepted	**R0320**	-	-	3,742					7,874
Gross - Non-proportional reinsurance accepted	**R0330**				-	1,813	-	-	1,813
Reinsurers' share	**R0340**	-	-	-	-	-	-	-	-
Net	**R0400**	-	-	3,742	-	1,813	-	-	9,687
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**	-	-	18,380	-	- 527	-	-	19,621
Other expenses	**R1200**								497
Total expenses	**R1300**								20,119

S.05.02.01

Premiums, claims and expenses by country (EUR'000s)

		Home Country	Top 5 countries (by amount of gross premiums written) - non-life obligations					Total Top 5 and home country
		C0010	C0020	C0030	C0040	C0050	C0060	C0070
	R0010		-	-	-	-	-	
		C0080	C0090	C0100	C0110	C0120	C0130	C0140
Premiums written								
Gross - Direct Business	R0110	-	-	-	-	-	-	-
Gross - Proportional reinsurance accepted	R0120	32,402	-	-	-	-	-	32,402
Gross - Non-proportional reinsurance accepted	R0130	1,947	-	-	-	-	-	1,947
Reinsurers' share	R0140	-	-	-	-	-	-	-
Net	R0200	34,349	-	-	-	-	-	34,349
Premiums earned								
Gross - Direct Business	R0210	-	-	-	-	-	-	-
Gross - Proportional reinsurance accepted	R0220	32,816	-	-	-	-	-	32,816
Gross - Non-proportional reinsurance accepted	R0230	1,947	-	-	-	-	-	1,947
Reinsurers' share	R0240	-	-	-	-	-	-	-
Net	R0300	34,763	-	-	-	-	-	34,763
Claims incurred								
Gross - Direct Business	R0310	-	-	-	-	-	-	-
Gross - Proportional reinsurance accepted	R0320	7,874	-	-	-	-	-	7,874
Gross - Non-proportional reinsurance accepted	R0330	1,813	-	-	-	-	-	1,813
Reinsurers' share	R0340	-	-	-	-	-	-	-
Net	R0400	9,687	-	-	-	-	-	9,687
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	19,621	-	-	-	-	-	19,621
Other expenses	R1200							497
Total expenses	R1300							20,119

S.05.02.01
Premiums, claims and expenses by country (EUR'000s)

		Home Country	Top 5 countries (by amount of gross premiums written) - life obligations					Total Top 5 and home country
		C0150	C0160	C0170	C0180	C0190	C0200	C0210
	R1400		-	-	-	-	-	
		C0220	C0230	C0240	C0250	C0260	C0270	C0280
Premiums written								
Gross	R1410	137,026	-	-	-	-	-	137,026
Reinsurers' share	R1420	3,411	-	-	-	-	-	3,411
Net	R1500	133,615	-	-	-	-	-	133,615
Premiums earned								
Gross	R1510	137,528	-	-	-	-	-	137,528
Reinsurers' share	R1520	3,411	-	-	-	-	-	3,411
Net	R1600	134,117	-	-	-	-	-	134,117
Claims incurred								
Gross	R1610	74,559	-	-	-	-	-	74,559
Reinsurers' share	R1620	-	-	-	-	-	-	-
Net	R1700	74,559	-	-	-	-	-	74,559
Changes in other technical provisions								
Gross	R1710	-	-	-	-	-	-	-
Reinsurers' share	R1720	-	-	-	-	-	-	-
Net	R1800	-	-	-	-	-	-	-
Expenses incurred	R1900	39,053	-	-	-	-	-	39,053
Other expenses	R2500							1,984
Total expenses	R2600							41,037

S.12.01.02
Life and Health SLT Technical Provisions (EUR'000s)

		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)**
				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**
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 as a whole	**R0020**	-	-			-			-	-	-
Technical provisions calculated as a sum of BE and RM											
Best Estimate											
Gross Best Estimate	**R0030**	-		-	-		-	-	-	(138,188)	(138,188)
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	**R0080**	-		-	-		-	-	-	-	-
Best estimate minus recoverables from reinsurance/SPV and Finite Re - total	**R0090**	-		-	-		-	-	-	-	-
Risk Margin	**R0100**	-	-			-			-	12,510	12,510
Amount of the transitional on Technical Provisions											
Technical Provisions calculated as a whole	**R0110**	-	-			-			-	-	-
Best estimate	**R0120**	-							-	-	-
Risk margin	**R0130**	-	-			-			-	-	-
Technical provisions - total	**R0200**	-	-			-			-	(125,678)	(125,678)

S.12.01.02
Life and Health SLT Technical Provisions (EUR'000s)

		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			
		C0160	**C0170**	**C0180**	**C0190**	**C0200**	**C0210**
Technical provisions calculated as a whole	**R0210**	-			-	-	-
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole	**R0220**	-			-	-	-
Technical provisions calculated as a sum of BE and RM							
Best Estimate							
Gross Best Estimate	**R0030**		-	-	-	211,814	211,814
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	**R0080**		-	-	-	-	-
Best estimate minus recoverables from reinsurance/SPV and Finite Re - total	**R0090**		-	-	-	-	-
Risk Margin	**R0100**	-			-	13,921	13,921
Amount of the transitional on Technical Provisions							
Technical Provisions calculated as a whole	**R0110**	-			-	-	-
Best estimate	**R0120**		-	-	-	-	-
Risk margin	**R0130**	-			-	-	-
Technical provisions - total	**R0200**	-			-	225,735	225,735

S.17.01.02
Non-life Technical Provisions (EUR'000s)

		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
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100
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 as a whole	R0050	-	-	-	-	-	-	-	-	-
Technical provisions calculated as a sum of BE and RM										
Best estimate										
Premium provisions										
Gross	R0060	-	-	-	156	-	-	-	-	-
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	-	-	-	156	-	-	-	-	-
Claims provisions										
Gross	R0160	-	-	-	4,758	-	-	-	-	-
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	-	-	-	4,758	-	-	-	-	-
Total Best estimate - gross	R0260	-	-	-	4,914	-	-	-	-	-
Total Best estimate - net	R0270	-	-	-	4,914	-	-	-	-	-
Risk margin	R0280	-	-	-	1,243	-	-	-	-	-
Amount of the transitional on Technical Provisions										
Technical Provisions calculated as a whole	R0290	-	-	-	-	-	-	-	-	-
Best estimate	R0300	-	-	-	-	-	-	-	-	-
Risk margin	R0310	-	-	-	-	-	-	-	-	-

		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
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100
Technical provisions - total										
Technical provisions - total	R0320	-	-	-	6,157	-	-	-	-	-
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	-	-	-	6,157	-	-	-	-	-

S.17.01.02
Non-life Technical Provisions (EUR'000s)

		Direct business and accepted proportional reinsurance			Accepted non-proportional reinsurance				Total Non-Life obligation
		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	
		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 as a whole	R0050	-	-	-	-	-	-	-	-
Technical provisions calculated as a sum of BE and RM									
Best estimate									
Premium provisions									
Gross	R0060	-	-	(2,241)	-	26	-	-	(2,059)
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	-	-	(2,241)	-	26	-	-	(2,059)
Claims provisions									
Gross	R0160	-	-	3,706	-	5,084	-	-	13,548
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	-	-	3,706	-	5,084	-	-	13,548
Total Best estimate - gross	R0260	-	-	1,465	-	5,110	-	-	11,489
Total Best estimate - net	R0270	-	-	1,465	-	5,110	-	-	11,489
Risk margin	R0280	-	-	4,388	-	1,304	-	-	6,935
Amount of the transitional on Technical Provisions									
Technical Provisions calculated as a whole	R0290	-	-	-	-	-	-	-	-
Best estimate	R0300	-	-	-	-	-	-	-	-
Risk margin	R0310	-	-	-	-	-	-	-	-

		Direct business and accepted proportional reinsurance			Accepted non-proportional reinsurance				Total Non-Life obligation
		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	
		C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180
Technical provisions - total									
Technical provisions - total	R0320	-	-	5,853	-	6,414	-	-	18,424
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	-	-	5,853	-	6,414	-	-	18,424

S.19.01.21
Non-life Insurance Claims Information (EUR'000s)

Total Non-Life Business

Accident year / Underwriting year	Z0010	

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

		Development year												
	Year	0	1	2	3	4	5	6	7	8	9	10 & +		In Current year	Sum of years (cumulative)
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110		C0170	C0180
Prior	R0100											-	R0100	-	12,170
N-9	R0160	680	539	483	135	19	6	2	2	-	-		R0160	-	1,866
N-8	R0170	1,273	1,500	822	169	12	10	-	-	-			R0170	-	3,786
N-7	R0180	1,783	2,707	1,458	184	25	14	11	-				R0180	-	6,181
N-6	R0190	2,159	3,604	1,739	237	21	10	4					R0190	4	7,775
N-5	R0200	2,501	3,786	1,735	190	20	4						R0200	4	8,236
N-4	R0210	2,626	3,731	1,494	156	17							R0210	17	8,024
N-3	R0220	2,745	2,761	1,218	108								R0220	108	6,832
N-2	R0230	2,570	2,576	939									R0230	939	6,085
N-1	R0240	4,200	4,109										R0240	4,109	8,309
N	R0250	3,705											R0250	3,705	3,705
													Total R0260	8,886	72,968

Gross undiscounted Best Estimate Claims Provisions
(absolute amount)

		Development year												
	Year	0	1	2	3	4	5	6	7	8	9	10 & +		Year end (discounted data)
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300		C0360
Prior	R0100											-	R0100	-
N-9	R0160	-	-	-	-	-	-	-	0	0	-		R0160	-
N-8	R0170	-	-	-	-	-	-	1	0	-			R0170	-
N-7	R0180	-	-	-	-	-	7	2	-				R0180	-
N-6	R0190	-	-	-	-	29	6	-					R0190	-
N-5	R0200	-	-	-	85	20	0						R0200	0
N-4	R0210	-	-	346	64	2							R0210	2
N-3	R0220	-	3,396	1,347	1,503								R0220	1,495
N-2	R0230	6,551	1,729	79									R0230	79
N-1	R0240	9,291	4,009										R0240	4,004
N	R0250	7,967											R0250	7,967
													Total R0260	13,548

S.23.01.01

Own funds (EUR'000s)

		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	21,251	21,251		-	
Share premium account related to ordinary share capital	R0030	78,066	78,066		-	
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	91,290	91,290			
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	-	-	-	-	-
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	190,607	190,607	-	-	-
Total available own funds to meet the MCR	R0510	190,607	190,607	-	-	
Total eligible own funds to meet the SCR	R0540	190,607	190,607	-	-	-
Total eligible own funds to meet the MCR	R0550	190,607	190,607	-	-	
SCR	R0580	105,728				
MCR	R0600	26,432				
Ratio of Eligible own funds to SCR	R0620	1.80				
Ratio of Eligible own funds to MCR	R0640	7.21				

		C0060
Reconciliation reserve		
Excess of assets over liabilities	R0700	190,607
Own shares (held directly and indirectly)	R0710	-
Foreseeable dividends, distributions and charges	R0720	-
Other basic own fund items	R0730	99,317
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	-
Reconciliation reserve	R0760	91,290
Expected profits		
Expected profits included in future premiums (EPIFP) - Life business	R0770	97,054
Expected profits included in future premiums (EPIFP) - Non- life business	R0780	1,827
Total Expected profits included in future premiums (EPIFP)	R0790	98,881

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

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0100
Market risk	R0010	39,396		-
Counterparty default risk	R0020	833		
Life underwriting risk	R0030	46,588	-	-
Health underwriting risk	R0040	66,875	-	-
Non-life underwriting risk	R0050	23,232	-	-
Diversification	R0060	(62,606)		
Intangible asset risk	R0070	-		
Basic Solvency Capital Requirement	R0100	114,318		

Calculation of Solvency Capital Requirement		C0100
Operational risk	R0130	6,514
Loss-absorbing capacity of technical provisions	R0140	-
Loss-absorbing capacity of deferred taxes	R0150	(15,104)
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	-
Solvency capital requirement excluding capital add-on	R0200	105,728
Capital add-on already set	R0210	-
Solvency capital requirement	R0220	105,728
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	-

S.28.01.01
Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity (EUR'000s)

Linear formula component for non-life insurance and reinsurance obligations

		C0010
MCR_{NL} Result	R0010	5,729

		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	4,914	6,140
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	-	-
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	1,465	26,322
Non-proportional health reinsurance	R0140	-	-
Non-proportional casualty reinsurance	R0150	5,111	1,887
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	10,549

		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	73,626	
Total capital at risk for all life (re)insurance obligations	R0250		12,861,017

Overall MCR calculation

		C0070
Linear MCR	R0300	16,278
SCR	R0310	105,728
MCR cap	R0320	47,577
MCR floor	R0330	26,432
Combined MCR	R0340	26,432
Absolute floor of the MCR	R0350	3,600
		C0070
Minimum Capital Requirement	R0400	26,432

APPENDIX 3 – QUANTITATIVE REPORTING TEMPLATES 31st DECEMBER 2017

S.02.01.02
Balance sheet (EUR'000s)

		Solvency II value
Assets		**C0010**
Intangible assets	**R0030**	-
Deferred tax assets	**R0040**	-
Pension benefit surplus	**R0050**	-
Property, plant & equipement held for own use	**R0060**	-
Investments (other than assets held for index-linked and unit-linked contracts)	**R0070**	336,267
Property (other than for own use)	**R0080**	-
Holdings in related undertakings, including participations	**R0090**	-
Equities	**R0100**	-
Equities - listed	**R0110**	-
Equities - unlisted	**R0120**	-
Bonds	**R0130**	212,713
Government Bonds	**R0140**	34,312
Corporate Bonds	**R0150**	169,816
Structured notes	**R0160**	8,585
Collateralised securities	**R0170**	-
Collective Investments Undertakings	**R0180**	123,554
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**	-
Loans on policies	**R0240**	-
Loans and mortgages to individuals	**R0250**	-
Other loans and mortgages	**R0260**	-
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**	27,763
Reinsurance receivables	**R0370**	-
Receivables (trade, not insurance)	**R0380**	279
Own shares (held directly)	**R0390**	-
Amounts due in respect of own fund items or initial fund called up but not yet	**R0400**	-
Cash and cash equivalents	**R0410**	3,543
Any other assets, not elsewhere shown	**R0420**	-
Total assets	**R0500**	**367,852**

S.02.01.02
Balance sheet (EUR'000s)

		Solvency II value
Liabilities		**C0010**
Technical provisions – non-life	**R0510**	17,841
Technical provisions – non-life (excluding health)	**R0520**	-
TP calculated as a whole	**R0530**	-
Best Estimate	**R0540**	9,621
Risk margin	**R0550**	8,220
Technical provisions - health (similar to non-life)	**R0560**	-
TP calculated as a whole	**R0570**	-
Best Estimate	**R0580**	-
Risk margin	**R0590**	-
Technical provisions - life (excluding index-linked and unit-linked)	**R0600**	102,395
Technical provisions - health (similar to life)	**R0610**	225,432
TP calculated as a whole	**R0620**	-
Best Estimate	**R0630**	209,130
Risk margin	**R0640**	16,302
Technical provisions – life (excluding health and index-linked and unit-linked)	**R0650**	(123,037)
TP calculated as a whole	**R0660**	-
Best Estimate	**R0670**	(137,630)
Risk margin	**R0680**	14,593
Technical provisions – index-linked and unit-linked	**R0690**	-
TP calculated as a whole	**R0700**	-
Best Estimate	**R0710**	-
Risk margin	**R0720**	-
Contingent liabilities	**R0740**	-
Provisions other than technical provisions	**R0750**	-
Pension benefit obligations	**R0760**	-
Deposits from reinsurers	**R0770**	-
Deferred tax liabilities	**R0780**	11,007
Derivatives	**R0790**	-
Debts owed to credit institutions	**R0800**	-
Financial liabilities other than debts owed to credit institutions	**R0810**	-
Insurance & intermediaries payables	**R0820**	23,282
Reinsurance payables	**R0830**	-
Payables (trade, not insurance)	**R0840**	978
Subordinated liabilities	**R0850**	-
Subordinated liabilities not in BOF	**R0860**	-
Subordinated liabilities in BOF	**R0870**	-
Any other liabilities, not elsewhere shown	**R0880**	-
Total liabilities	**R0900**	**155,503**
Excess of assets over liabilities	**R1000**	**212,349**

S.05.01.02

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

		Line of Business for: **non-life insurance and reinsurance obligations (direct business and accepted proportional**								
		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**	-	-	-	-	-	-	-	-	-
Gross - Proportional reinsurance accepted	**R0120**	-	-	-	7,114	-	-	-	-	-
Gross - Non-proportional reinsurance accepted	**R0130**									
Reinsurers' share	**R0140**	-	-	-	-	-	-	-	-	-
Net	**R0200**	-	-	-	7,114	-	-	-	-	-
Premiums earned										
Gross - Direct Business	**R0210**	-	-	-	-	-	-	-	-	-
Gross - Proportional reinsurance accepted	**R0220**	-	-	-	7,114	-	-	-	-	-
Gross - Non-proportional reinsurance accepted	**R0230**									
Reinsurers' share	**R0240**	-	-	-	-	-	-	-	-	-
Net	**R0300**	-	-	-	7,114	-	-	-	-	-
Claims incurred										
Gross - Direct Business	**R0310**	-	-	-	-	-	-	-	-	-
Gross - Proportional reinsurance accepted	**R0320**	-	-	-	4,594	-	-	-	-	-
Gross - Non-proportional reinsurance accepted	**R0330**									
Reinsurers' share	**R0340**	-	-	-	-	-	-	-	-	-
Net	**R0400**	-	-	-	4,594	-	-	-	-	-
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**	-	-	-	2,609	-	-	-	-	-
Other expenses	**R1200**									
Total expenses	**R1300**									

S.05.01.02
Premiums, claims and expenses by line of business (EUR'000s)

		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**	-	-	-					-
Gross - Proportional reinsurance accepted	**R0120**	-	-	29,950					37,064
Gross - Non-proportional reinsurance accepted	**R0130**				-	1,853	-	-	1,853
Reinsurers' share	**R0140**	-	-	-	-	-	-	-	-
Net	**R0200**	-	-	29,950	-	1,853	-	-	38,917
Premiums earned									
Gross - Direct Business	**R0210**	-	-	-					-
Gross - Proportional reinsurance accepted	**R0220**	-	-	30,331					37,445
Gross - Non-proportional reinsurance accepted	**R0230**				-	1,853	-	-	1,853
Reinsurers' share	**R0240**	-	-	-	-	-	-	-	-
Net	**R0300**	-	-	30,331	-	1,853	-	-	39,298
Claims incurred									
Gross - Direct Business	**R0310**	-	-	-					-
Gross - Proportional reinsurance accepted	**R0320**	-	-	4,564					9,158
Gross - Non-proportional reinsurance accepted	**R0330**				-	(490)	-	-	(490)
Reinsurers' share	**R0340**	-	-	-	-	-	-	-	-
Net	**R0400**	-	-	4,564	-	(490)	-	-	8,668
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**	-	-	20,990	-	173	-	-	23,772
Other expenses	**R1200**								-
Total expenses	**R1300**								23,772

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

		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**	-	-	-	-	-	-	29,470	147,548	177,019
Reinsurers' share	**R1420**	-	-	-	-	-	-	-	22,033	22,033
Net	**R1500**	-	-	-	-	-	-	29,470	125,516	154,986
Premiums earned										
Gross	**R1510**	-	-	-	-	-	-	29,616	148,061	177,677
Reinsurers' share	**R1520**	-	-	-	-	-	-	-	22,033	22,033
Net	**R1600**	-	-	-	-	-	-	29,616	126,028	155,644
Claims incurred										
Gross	**R1610**	-	-	-	-	-	-	91,701	1,413	93,114
Reinsurers' share	**R1620**	-	-	-	-	-	-	1,733	-	1,733
Net	**R1700**	-	-	-	-	-	-	89,968	1,413	91,381
Changes in other technical provisions										
Gross	**R1710**	-	-	-	-	-	-	(1,910)	-	(1,910)
Reinsurers' share	**R1720**	-	-	-	-	-	-	-	-	-
Net	**R1800**	-	-	-	-	-	-	(1,910)	-	(1,910)
Expenses incurred	**R1900**	-	-	-	-	-	-	7,247	38,179	45,426
Other expenses	**R2500**									-
Total expenses	**R2600**									45,426

S.05.02.01

Premiums, claims and expenses by country (EUR'000s)

		Home Country	Top 5 countries (by amount of gross premiums written) - non-life obligations					Total Top 5 and home country
		C0010	C0020	C0030	C0040	C0050	C0060	C0070
	R0010		-	-	-	-	-	
		C0080	C0090	C0100	C0110	C0120	C0130	C0140
Premiums written								
Gross - Direct Business	R0110	-	-	-	-	-	-	-
Gross - Proportional reinsurance accepted	R0120	37,064	-	-	-	-	-	37,064
Gross - Non-proportional reinsurance accepted	R0130	1,853	-	-	-	-	-	1,853
Reinsurers' share	R0140	-	-	-	-	-	-	-
Net	R0200	38,917	-	-	-	-	-	38,917
Premiums earned								
Gross - Direct Business	R0210	-	-	-	-	-	-	-
Gross - Proportional reinsurance accepted	R0220	37,445	-	-	-	-	-	37,445
Gross - Non-proportional reinsurance accepted	R0230	1,853	-	-	-	-	-	1,853
Reinsurers' share	R0240	-	-	-	-	-	-	-
Net	R0300	39,298	-	-	-	-	-	39,298
Claims incurred								
Gross - Direct Business	R0310	-	-	-	-	-	-	-
Gross - Proportional reinsurance accepted	R0320	9,158	-	-	-	-	-	9,158
Gross - Non-proportional reinsurance accepted	R0330	(490)	-	-	-	-	-	(490)
Reinsurers' share	R0340	-	-	-	-	-	-	-
Net	R0400	8,668	-	-	-	-	-	8,668
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	23,290	-	-	-	-	-	23,290
Other expenses	R1200							481
Total expenses	R1300							23,772

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Premiums, claims and expenses by country (EUR'000s)

		Home Country	Top 5 countries (by amount of gross premiums written) - life obligations					Total Top 5 and home country
		C0150	C0160	C0170	C0180	C0190	C0200	C0210
	R1400		-	-	-	-	-	
		C0220	C0230	C0240	C0250	C0260	C0270	C0280
Premiums written								
Gross	R1410	177,019	-	-	-	-	-	177,019
Reinsurers' share	R1420	22,033	-	-	-	-	-	22,033
Net	R1500	154,986	-	-	-	-	-	154,986
Premiums earned								
Gross	R1510	177,677	-	-	-	-	-	177,677
Reinsurers' share	R1520	22,033	-	-	-	-	-	22,033
Net	R1600	155,644	-	-	-	-	-	155,644
Claims incurred								
Gross	R1610	93,114	-	-	-	-	-	93,114
Reinsurers' share	R1620	1,733	-	-	-	-	-	1,733
Net	R1700	91,381	-	-	-	-	-	91,381
Changes in other technical provisions								
Gross	R1710	(1,910)	-	-	-	-	-	(1,910)
Reinsurers' share	R1720	-	-	-	-	-	-	-
Net	R1800	(1,910)	-	-	-	-	-	(1,910)
Expenses incurred	R1900	43,236	-	-	-	-	-	43,236
Other expenses	R2500							2,189
Total expenses	R2600							45,426

S.12.01.02

Life and Health SLT Technical Provisions (EUR'000s)

		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)**
				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**
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 as a whole	**R0020**	-	-			-			-	-	-
Technical provisions calculated as a sum of BE and RM											
Best Estimate											
Gross Best Estimate	**R0030**	-		-	-		-	-	-	(137,630)	(137,630)
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	**R0080**	-		-	-		-	-	-	-	-
Best estimate minus recoverables from reinsurance/SPV and Finite Re - total	**R0090**	-		-	-		-	-	-	-	-
Risk Margin	**R0100**	-	-			-			-	14,593	14,593
Amount of the transitional on Technical Provisions											
Technical Provisions calculated as a whole	**R0110**	-	-			-			-	-	-
Best estimate	**R0120**	-							-	-	-
Risk margin	**R0130**	-	-			-			-	-	-
Technical provisions - total	**R0200**	-	-			-			-	(123,037)	(123,037)

S.12.01.02
Life and Health SLT Technical Provisions (EUR'000s)

		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			
		C0160	**C0170**	**C0180**	**C0190**	**C0200**	**C0210**
Technical provisions calculated as a whole	**R0210**	-			-	-	-
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole	**R0220**	-			-	-	-
Technical provisions calculated as a sum of BE and RM							
Best Estimate							
Gross Best Estimate	**R0030**		-	-	-	209,130	209,130
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	**R0080**		-	-	-	-	-
Best estimate minus recoverables from reinsurance/SPV and Finite Re - total	**R0090**		-	-	-	-	-
Risk Margin	**R0100**	-			-	16,302	16,302
Amount of the transitional on Technical Provisions							
Technical Provisions calculated as a whole	**R0110**	-			-	-	-
Best estimate	**R0120**		-	-	-	-	-
Risk margin	**R0130**	-			-	-	-
Technical provisions - total	**R0200**	-			-	225,432	225,432

S.17.01.02
Non-life Technical Provisions (EUR'000s)

		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
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100
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 as a whole	R0050	-	-	-	-	-	-	-	-	-
Technical provisions calculated as a sum of BE and RM										
Best estimate										
Premium provisions										
Gross	R0060	-	-	-	222	-	-	-	-	-
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	-	-	-	222	-	-	-	-	-
Claims provisions										
Gross	R0160	-	-	-	4,470	-	-	-	-	-
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	-	-	-	4,470	-	-	-	-	-
Total Best estimate - gross	R0260	-	-	-	4,692	-	-	-	-	-
Total Best estimate - net	R0270	-	-	-	4,692	-	-	-	-	-
Risk margin	R0280	-	-	-	1,384	-	-	-	-	-
Amount of the transitional on Technical Provisions										
Technical Provisions calculated as a whole	R0290	-	-	-	-	-	-	-	-	-
Best estimate	R0300	-	-	-	-	-	-	-	-	-
Risk margin	R0310	-	-	-	-	-	-	-	-	-

		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
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100
Technical provisions - total										
Technical provisions - total	R0320	-	-	-	6,076	-	-	-	-	-
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	-	-	-	6,076	-	-	-	-	-

S.17.01.02
Non-life Technical Provisions (EUR'000s)

		Direct business and accepted proportional reinsurance			Accepted non-proportional reinsurance				Total Non-Life obligation
		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	
		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 as a whole	R0050	-	-	-	-	-	-	-	-
Technical provisions calculated as a sum of BE and RM									
Best estimate									
Premium provisions									
Gross	R0060	-	-	(2,432)	-	(110)	-	-	(2,321)
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	-	-	(2,432)	-	(110)	-	-	(2,321)
Claims provisions									
Gross	R0160	-	-	6,454	-	1,017	-	-	11,942
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	-	-	6,454	-	1,017	-	-	11,942
Total Best estimate - gross	R0260	-	-	4,022	-	907	-	-	9,621
Total Best estimate - net	R0270	-	-	4,022	-	907	-	-	9,621
Risk margin	R0280	-	-	5,638	-	1,198	-	-	8,220
Amount of the transitional on Technical Provisions									
Technical Provisions calculated as a whole	R0290	-	-	-	-	-	-	-	-
Best estimate	R0300	-	-	-	-	-	-	-	-
Risk margin	R0310	-	-	-	-	-	-	-	-

		Direct business and accepted proportional reinsurance			Accepted non-proportional reinsurance				Total Non-Life obligation
		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	
		C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180
Technical provisions - total									
Technical provisions - total	R0320	-	-	9,660	-	2,105	-	-	17,841
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	-	-	9,660	-	2,105	-	-	17,841

S.19.01.21
Non-life Insurance Claims Information (EUR'000s)

Total Non-Life Business

Accident year / Underwriting year	Z0010	

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

	Year	Development year 0	1	2	3	4	5	6	7	8	9	10 & +		In Current year	Sum of years (cumulative)
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110		C0170	C0180
Prior	R0100											-	R0100	-	16,187
N-9	R0160	460	423	457	171	13	3	0	-	-	-		R0160	-	1,529
N-8	R0170	680	539	483	135	19	6	2	2	-			R0170	-	1,866
N-7	R0180	1,273	1,500	823	171	12	10	-	-				R0180	-	3,789
N-6	R0190	1,783	2,708	1,448	184	25	14	11					R0190	11	6,172
N-5	R0200	2,158	3,573	1,739	237	21	11						R0200	11	7,740
N-4	R0210	2,503	3,785	1,735	190	20							R0210	20	8,233
N-3	R0220	2,626	3,731	1,494	154								R0220	154	8,005
N-2	R0230	2,747	2,761	1,233									R0230	1,233	6,740
N-1	R0240	2,570	2,546										R0240	2,546	5,116
N	R0250	3,690											R0250	3,690	3,690
													Total R0260	7,665	69,066

Gross undiscounted Best Estimate Claims Provisions
(absolute amount)

	Year	Development year 0	1	2	3	4	5	6	7	8	9	10 & +		Year end (discounted data)
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300		C0360
Prior	R0100											-	R0100	-
N-9	R0160	-	-	-	-	-	-	-	-	-	-		R0160	-
N-8	R0170	-	-	-	-	-	-	-	-	-			R0170	-
N-7	R0180	-	-	-	-	-	-	1	-				R0180	-
N-6	R0190	-	-	-	-	-	7	2					R0190	2
N-5	R0200	-	-	-	-	29	6						R0200	6
N-4	R0210	-	-	-	85	20							R0210	20
N-3	R0220	-	-	346	64								R0220	64
N-2	R0230	-	3,396	1,347									R0230	1,050
N-1	R0240	6,551	1,729										R0240	1,509
N	R0250	9,291											R0250	9,291
													Total R0260	11,942

S.23.01.01
Own funds (EUR'000s)

		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	21,251	21,251		-	
Share premium account related to ordinary share capital	R0030	78,066	78,066		-	
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	113,031	113,031			
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	-	-	-	-	-
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	212,349	212,349	-	-	-
Total available own funds to meet the MCR	R0510	212,349	212,349	-	-	
Total eligible own funds to meet the SCR	R0540	212,349	212,349	-	-	-
Total eligible own funds to meet the MCR	R0550	212,349	212,349	-	-	
SCR	R0580	108,746				
MCR	R0600	27,187				
Ratio of Eligible own funds to SCR	R0620	1.95				
Ratio of Eligible own funds to MCR	R0640	7.81				

		C0060
Reconciliation reserve		
Excess of assets over liabilities	R0700	212,349
Own shares (held directly and indirectly)	R0710	-
Foreseeable dividends, distributions and charges	R0720	-
Other basic own fund items	R0730	99,317
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	-
Reconciliation reserve	R0760	113,031
Expected profits		
Expected profits included in future premiums (EPIFP) - Life business	R0770	103,347
Expected profits included in future premiums (EPIFP) - Non- life business	R0780	2,321
Total Expected profits included in future premiums (EPIFP)	R0790	105,668

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

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0100
Market risk	R0010	33,827		-
Counterparty default risk	R0020	1,200		
Life underwriting risk	R0030	56,686	-	-
Health underwriting risk	R0040	63,324	-	-
Non-life underwriting risk	R0050	26,553	-	-
Diversification	R0060	(65,522)		
Intangible asset risk	R0070	-		
Basic Solvency Capital Requirement	R0100	116,068		

Calculation of Solvency Capital Requirement		C0100
Operational risk	R0130	8,213
Loss-absorbing capacity of technical provisions	R0140	-
Loss-absorbing capacity of deferred taxes	R0150	(15,535)
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	-
Solvency capital requirement excluding capital add-on	R0200	108,746
Capital add-on already set	R0210	-
Solvency capital requirement	R0220	108,746
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	-

S.28.01.01

Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity (EUR'000s)

Linear formula component for non-life insurance and reinsurance obligations

		C0010
MCR_{NL} Result	R0010	5,933

		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	4,692	7,114
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	-	-
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	4,022	29,950
Non-proportional health reinsurance	R0140	-	-
Non-proportional casualty reinsurance	R0150	907	1,853
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	12,912

		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	71,500	
Total capital at risk for all life (re)insurance obligations	R0250		16,298,882

Overall MCR calculation

		C0070
Linear MCR	R0300	18,845
SCR	R0310	108,746
MCR cap	R0320	48,936
MCR floor	R0330	27,187
Combined MCR	R0340	27,187
Absolute floor of the MCR	R0350	3,600
		C0070
Minimum Capital Requirement	R0400	27,187