Esself dac

Solvency and Financial Condition Report
for the reporting period ended 31 December 2018

Approved by the Board on 11 April 2019

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Summary

This Report refers to the business of Esself dac ('the Company', 'Esself'), an authorised reinsurer supervised by the Central Bank of Ireland. It provides the reader with information on the Company's business and performance, system of governance, risk profile, valuation for solvency purposes and capital management for the reporting period ended 31 December 2018.

The Company's is a wholly owned subsidiary of Corporación Químico Farmaceútica Esteve S.A. ('Esteve'), an international pharmaceutical group headquartered in Barcelona, which is also its ultimate parent company.

Esself's business strategy is to act as a captive reinsurer in respect of specified trade credit, products, and other product related risks of the Esteve Group. The Company caps its exposure on the reinsurance programme through the use of occurrence and annual aggregates on the lines of business underwritten. However, following a restructuring by Esteve of its international insurance programme, the reinsurance provided by Esself is to be dispensed with effective underwriting year 2019, with no further future involvement foreseen. As a consequence, the Board of Esself have resolved to take the required steps to ultimately place the Company into liquidation at the earliest date.

An underwriting profit of EUR899,991 was recorded for the reporting period, a fall by 43.56% on last period's result (2017: EUR1,594,691). The Company does not currently purchase retrocession due to its capital strength and this approach is reassessed on an annual basis when considering its reinsurance programme.

The overall strategic objective of the Company with respect to its investment policy is to preserve principal value while covering its technical reserve requirements and meeting its ongoing cash flow needs. Given the short-term nature of the Company's risk exposures, the practice is to retain funds to meet such liabilities in short term deposits/cash balances. Additional funds have previously been advanced by way of an intercompany loan to Esteve, but this arrangement was terminated in December 2018.

The Board of the Company is ultimately accountable and responsible for the performance and conduct of Esself and has appointed four key function holders (Compliance, Internal Audit, Risk Management and Actuarial) and a Management Services Provider to ensure the Company is governed effectively and in line with its regulatory obligations.

The Board has identified the key risks to which Esself is exposed and established appropriate corporate governance, risk management and reporting mechanisms to ensure that the identified risks remain relevant, and that they are managed and reported on with appropriate levels of detail and frequency. Documented escalation mechanisms are in place to ensure that breaches in risk tolerances, internal controls and governance requirements are reported promptly to the appropriate individuals. The current risk profile of the Company and its underlying drivers are well understood and appropriate for the nature, scale and complexity of the business and within its risk appetite.

There have been no material changes over the reporting period in respect of the Company's business and performance, system of governance, risk profile, valuation for solvency purposes and capital management.

The Company's assets are valued on an economic basis in line with FRS 102 "The Financial Reporting Standard applicable in the UK and Republic of Ireland" and its technical provisions include a discounted best estimate plus risk margin.

As at 31 December 2018, the Company had basic own funds of EUR11,510,964 available to meet its Solvency Capital Requirement of EUR2,604,085 (2017: EUR15,704,276 and EUR5,215,466 respectively). The movement in basic own funds reflected a distribution of EUR4m made during the reporting period, together with the profits of the Company as adjusted for Solvency II valuation items. This 442% solvency coverage as at 31 December 2018 was in line with the Company's risk appetite. The Minimum Capital Requirement was also satisfactorily met at the period-end. There were no instances of non-compliance with the capital requirements during the period.

A. Business and Performance

A.1 Business

General Information

Esself dac was incorporated on 12 December 2003 as a captive reinsurer of the Esteve Group. The Company converted to a designated activity company limited by shares under the Companies Act 2014 on 18 May 2016.

The Company holds a Certificate of Authorisation from the Central Bank of Ireland ('CBOI') to carry out the business of reinsurance (Ref. No.: C40431) pursuant to the European Union (Insurance and Reinsurance) Regulations 2015 (SI 485). Its registered office and place of business is 13 Fitzwilliam Street Upper, Dublin 2.

The Insurance Supervision Team of the Central Bank of Ireland may be contacted at:

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Tel: +353 1 224 4000

The Company's external auditors are:

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D02 AY28
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During the period, the Esteve Group underwent a reorganisation of its corporate structure. This involved a change to the shareholding of Esself dac by eliminating the indirect holdings currently held and making the Company's current ultimate parent, its direct parent. An Acquiring Transaction Notification Form was submitted to the CBOI in July 2018 advising of this intended restructuring, to which the CBOI issued no objection. On 14 January 2019, clearance was received from the Commercial Registrar for the Group's proposed changes, made effective from 30 November 2018. As a consequence, the parent company of Esself dac changed from Amilcar S.A. to Corporación Químico Farmaceútica Esteve S.A. ('Esteve'), an international pharmaceutical group headquartered in Barcelona, which is also the ultimate parent company. Esself is the only (re)insurance company within the Esteve Group and has no branches.

From its foundation as a small pharmacy in Barcelona in 1929, thanks to the effort of all stakeholders and the trust of clients and patients, Esteve has established itself as a leading business group in the area of health, with a clear, research-centered international approach and an active policy of strategic alliances with other companies. Esteve is a family business group with over 2,600 employees that focuses on innovation and excellence in the scope of healthcare by working every day to meet the needs of its clients and contribute to the well-being of people. Its activities focus on:

- Pharmaceuticals - the research, development and marketing of new medicines. Esteve has a wide portfolio of prescription and OTC medicines;
- Chemistry - Esteve develops active pharmaceutical ingredients (APIs) which it later manufactures and markets for the global pharmaceutical industry development;
- Generics - manufacturing and marketing of generic drugs in the main therapeutic areas. It offers drugs with added value, thus covering the life cycle of the medicine and contributing to the sustainability of the health system; and
- Joint Ventures – building successful strategic alliances with other leading companies to provide innovation in the field of healthcare.

Business Details

The principal activity of the Company is to provide reinsurance coverage for certain risks arising out of the pharmaceutical business undertaken by various entities of the Esteve Group via a fronting arrangement with affiliated entities of American International Group, Inc. (AIG).

The risks accepted by Esself together with the relevant lines of business are as follows:

Risks reinsured	Reinsurance Line of Business Mapping
Contaminated Products	Proportional – General Liability
Environmental Liability	Non-Proportional Casualty
Fidelity Guarantee	Proportional – Misc. Financial Loss
Trade Credit (Spanish domestic and export)	Non-Proportional Property
Trade Credit (US domestic)	Proportional – Credit & Suretyship

The cedant is domiciled in the UK and the USA. While the risks for the majority of lines of business arise in Spain, the Proportional Credit & Suretyship risks arise solely in the USA and the Non-Proportional property risks are diversified across 15 countries with Spain having the largest concentration of risk (42%).

There has been no significant business or other events in the reporting period which have had a material impact on the Company.

A.2 Underwriting Performance

The Company's underwriting year is co-terminus with its financial year ending 31 December. Results for the reporting periods ended 31 December 2018 and 2017 are shown below:

	2018 EUR	2017 EUR
Premiums assumed and earned - gross and net amount	1,819,228	1,964,875
Claims paid – gross and net amounts	-	*(70,323)*
Change in provision for claims – gross and net amount	*(320,623)*	*31,533*
Claims incurred, gross and net of reinsurance	(320,623)	(38,790)
Acquisition costs	(91,911)	(100,407)
Administrative expenses	(560,708)	(321,083)
Underwriting result	**845,986**	**1,504,595**
Analysed by reinsurance line of business and geographical area:		
Proportional – General Liability (Spain)	107,584	179,519
Non-Proportional Casualty (Spain)	74,895	135,290
Proportional – Misc. Financial Loss (Spain)	81,666	136,591
Non-Proportional Property (Spain)	459,046	823,970
Proportional- Credit & Suretyship (US)	122,795	229,225
	845,986	**1,504,595**

Gross premiums assumed and earned are split by reinsurance line of business as follows:

	2018 EUR	2017 EUR
Proportional – General Liability	227,070	227,070
Non-Proportional Casualty	171,126	171,126
Proportional – Misc. Financial Loss ('MFL')	172,771	172,771
Non-Proportional Property	1,044,857	1,091,288
Proportional- Credit & Suretyship	203,404	302,620
	1,819,228	**1,964,875**

Claims incurred comprise an outstanding loss reserve for a single non-proportional property (Trade Credit) claim reported in the period of EUR17k (2017: EUR nil). There is a year-on-year increase in the provision for Incurred but not reported ('IBNR') claims of EUR304k. The bulk of this movement relates to the non-proportional property line of business due to a significant exposure to an overdue creditor identified. Whilst IBNR had not been provided for the other lines of business in previous years, the fact that their related treaties contain a 12-month notification clause, deemed it possible that 2018 claims could subsequently emerge. On this basis, a total IBNR provision of EUR105k was made across the General Liability, Casualty and MFL lines.

Acquisition costs are typically 4.6% of premium written, unchanged from 2017, with a higher rate applicable to the US business. Administration expenses include a foreign exchange gain of EUR 36,669 (2017: loss of EUR72,000). Excluding this amount, the administration costs incurred are 140% higher than last period. This significant increase is due to the inclusion of a run-off cost provision. Following the Group's decision not to renew the reinsurance programme in 2019 and the Board's subsequent decision to take the necessary steps to ultimately wind down the Company's operations, the auditors advised that a run-off provision within the 2018 results was appropriate.

A.3 Investment Performance

In line with its investment policy, the Company invests in deposits with appropriately rated banks and has entered into a loan facility agreement with Corporación Químico Farmaceútica Esteve S.A. Its net investment return for the reporting and comparative period is as follows:

	2018 EUR	2017 EUR
Intercompany loan (classified as 'Other loans and mortgages')	53,514	93,056
Deposits other than cash equivalents	3,294	171
Cash and cash equivalents	(2,803)	(3,131)
Net investment return	**54,005**	**90,096**

Interest earned from the intercompany loan is down on last period due to a lower average balance of EUR4m being held throughout 2018 compared to last period when a balance of EUR7m was held. (A dividend of EUR3m was sourced from the intercompany loan and paid to the shareholder at the end of 2017). Higher USD deposits were held during this period compared to 2017 and as there was a positive interest rate yielded on such deposits, this explains the favourable year on year increase in interest earned from Deposits other than cash equivalents.

A.4 Performance of other activities

The Company does not carry out any other activities other than the reinsurance business described in A.1 above and has not entered into any leasing agreements.

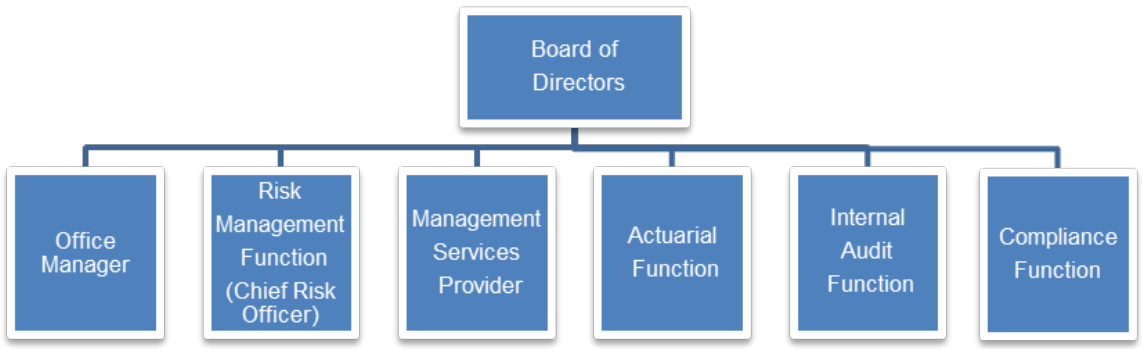
A.5 Any other information

There are no other material matters to disclose in relation to the Company's business.

B. System of Governance

B.1 General information on the system of governance

The organisational structure of the Company is as follows:



Indicates direct reporting lines

The Board of the Company is the focal point of the corporate governance regime. It is ultimately accountable and responsible for the performance and conduct of the Company. The Board has a paramount role to ensure that the Company satisfies all regulatory and statutory requirements related to its operations and has appointed four key function holders (Compliance, Internal Audit, Risk Management and Actuarial) and a Management Services Provider to ensure adherence to these obligations. All function holders report directly to the Board through the Chairman. In reporting to the Board, the holders of the above positions ensure that they provide information which is timely, accurate and sufficiently detailed so as to enable the Board to make informed decisions and discharge its duties appropriately.

The Directors are responsible for monitoring performance of the Company on behalf of its ultimate shareholder. In this context, the Board has defined the Company's strategic objectives, which are reviewed annually.

Authority for all actions and expenditure within the Company flows from the Board who have put in place the necessary systems of internal control within the Company to ensure that business is undertaken in a controlled and responsible manner.

The Company has formalised and documented its governance structures and responsibilities within its Corporate Governance Manual (CGM) which is updated, together with the supporting policies, and reviewed by the Board on an annual basis.

Board of Directors

The Board is comprised of only those persons with sufficient knowledge of the Company's business and the environment in which it operates so as to properly contribute to the effective running of the Company and the achievement of its objectives.

The Board members have:

- The necessary knowledge, skills, experience, expertise, competencies, professionalism, fitness, probity and integrity to carry out their duties;
- A full understanding of the nature of the Company's business, material activities and related risks;
- A full understanding of their individual direct and indirect responsibilities and collective responsibilities; and
- An understanding of the Company's financial statements and key performance drivers.

The Company is controlled and directed through the Board which consists of the following senior personnel who have been selected to ensure that the Company is being run by individuals of appropriate expertise and integrity and who meet the criteria set out above:

José Luis Urbieta
Frank Coyle
Patrick Newham

Notwithstanding any third-party/group management arrangements or delegated authorities which are established, the Board formally acknowledges its responsibility for the following areas:

- The effective, prudent and ethical oversight of the Company;
- Ensuring that risk and compliance are properly managed;
- Establishing the strategy and policies of the Company and overseeing and monitoring their implementation;
- Setting the corporate tone regarding governance, ethics and general behaviour;
- Establishment, review and approval of systems of internal control, risk management, regulatory compliance and codes of conduct to ensure that the Company is compliant with relevant laws, regulations and codes of conduct; and
- Accountability for the Company's performance and results.

The Board may delegate authority to sub-committees or management to act on their behalf in respect of certain matters but, where the Board does so, it has documented mechanisms in place regarding the activities delegated and the monitoring of the exercise of such delegated functions. Activities are delegated and allocated in such a manner that no one individual has unfettered control of the business. The Board cannot abrogate its responsibility for functions delegated.

The Terms of Reference of the Board are fully documented and are reviewed annually to ensure that they continue to be appropriate and reflective of the Board's obligations.

As documented in the CGM, the key responsibilities of the Board are to:

a. Ensure the appropriate knowledge, skills, experience and commitment exists within the Board of Directors to oversee the Company effectively.
b. Set out the corporate governance principles, responsibilities, and commitments appropriate to the Company and ensure they are communicated throughout the Company.
c. Establish policies and strategies to ensure compliance with principles, responsibilities, and commitments and to establish procedures for monitoring and evaluating the progress towards them. Adherence to the policies and strategies must be reviewed annually.
d. Establish standards of business conduct and ethical behaviour for directors, senior management and other personnel. These include policies on conflicts of interest.
e. Establish procedures for the appointment, disciplinary procedures and dismissal of senior management, including the establishment of a remuneration policy that is reviewed periodically. The remuneration policy will not include incentives that would encourage imprudent or reckless behaviour.
f. Satisfy itself that the Company is organised in a way that promotes the effective and prudent management of the undertaking and the Board of Director's oversight of that management. In this context, the Board of Directors must satisfy itself as to the existence of a risk management function, proportionate to the nature, scale and complexity of the insurance undertaking's business that monitors the risks related to the type of business undertaken.
g. Establish an appropriate compliance function, internal audit function, actuarial function and risk management function and establish the applicable checks and balances for each function.
h. Determine and review the Company's strategic direction.
i. Approve and oversee the management of all renewal processes, including signing off inwards reinsurance and outwards reinsurance programmes as necessary.
j. Keep under review and maintain the Company's capital and liquidity positions.
k. Review and approve proposals for the allocation of capital and other resources.
l. Approve material acquisitions and disposals of assets.
m. Approval of, and review of compliance with, the Risk Appetite Statement.
n. Receive Quarterly Business and Financial Reports and review actual performance in the light of the Company's strategy, objectives, corporate and business plans and budgets.

o. Consider and approve the Company's procedures for reviewing and monitoring risk, and receive regular reports thereon.
p. Approve the Company's annual audited financial statements and any other published financial statements or other material significant statements issued.
q. Determine dividend policy.
r. Review and approve the Company's annual Compliance and Directors' Accuracy statements which form part of and accompany the return to the CBOI.
s. Review and approve annually all policies of the Company.
t. Review and, as appropriate, agree changes in the terms of reference of sub committees that could be established by the Board.
u. Collectively ensure that the Company complies with all relevant laws, regulations and any established codes of conduct.
v. Identify a Compliance Officer.
w. Identify a Chief Risk Officer.
x. Ensure an open and transparent communication with the CBOI.
y. Take an active role in the Own Risk & Solvency Assessment processes and develop the appropriate responses for the Company.

Delegated Authorities

In furtherance of the effective operation of the Company's activities, the Board has seen fit to delegate the following roles to the persons/bodies noted:

Activity	**Individual/Body Responsible**
Transfer of funds/payments in line with established bank mandate	Authorised Signatories
Approval of expenses	Authorised Signatories

The Board reserves the right to withdraw or amend such delegated authorities at any time should they see fit to do so.

Key Functions

The main roles and responsibilities of the key functions are as follows:

Compliance
- Ensure the Company is kept up to date with the CBOI's compliance standards;
- Obtain the approval of the Board of Directors for policy statements on compliance with the Regulations, with the requirements of the CBOI and with any other applicable legislation; and
- Monitor the implementation of compliance procedures and to report periodically to the Board of Directors thereon.

Actuarial
- Review of the reliability and adequacy of the calculation of technical provisions, including the appropriateness of methodologies adopted and the sufficiency and quality of data used;
- Comparison of best estimates against experience;
- Express an opinion on the Company's overall underwriting policy;
- Express an opinion on the adequacy of reinsurance arrangements; and
- Contribute to the effective implementation of the Company's risk management system.

Internal Audit
- Review and assess compliance with, and the efficacy of, the Company's governance arrangements, operational procedures and internal controls;
- Report to the Board on scope of work to be carried out and subsequent findings and recommendations; and
- Check to ensure that any agreed recommendations arising from internal audit reviews are implemented by the Board.

Risk Management
- Monitoring and managing the risks to which the Company is exposed;
- Reporting to the Board on the Company's risks and the processes established to identify and manage risks;

- Ensuring that risk management is well integrated into the organisation structure of the Company and its decision-making processes; and
- Presenting to the Board at each Board meeting on the current status of any risks identified which need to be brought to their attention.

The Board ensures that the function holders have the necessary authority, resources and operational independence to carry out their tasks. This is achieved by ensuring clear documented terms of reference, policies and procedures are in place and agreed by all parties and by having an open communication channel between the Board and the function holders. The Company's size and straightforward structure also facilitates the direct reporting by the function holders to the Board.

Remuneration

In accordance with the Company's documented remuneration policy, employee remuneration is established by reference to Irish market rates and terms and conditions of employment are set out in a documented employment contract, signed by both parties.

Directors who are not employees of the Company but who are employed by another group company receive no remuneration for the performance of their duties as Directors. All Directors receive a letter of appointment setting out the terms and conditions of their role. Directors are entitled to the reimbursement of normal business expenses associated with their travel to the Company's main place of business for the purpose of discharging their duties as Directors.

Changes and Material Transactions

There have been no material changes to the Company's system of Governance during the reporting period. The Company declared a dividend of EUR4m to its shareholder, paid on 18 December 2018 which was funded from a full repayment received of the intercompany loan made to an affiliate company. This resulted in the termination of the intercompany loan arrangement. Otherwise, Esself did not enter into any other material transactions with its shareholder or members of the Board of Directors.

B.2 Fit and proper requirements

The Company acknowledges its responsibilities with respect to ensuring the fitness and probity of those individuals carrying out controlled functions on its behalf. The relevant Pre-approval Controlled Functions (PCF) applicable to the Company have been identified and the individuals being proposed for a PCF role will be subject to the appropriate level of due diligence in order for the Company to confirm that they are:

(a) competent and capable;
(b) honest, ethical and act with integrity; and
(c) financially sound.

As part of its Corporate Governance regime the Company has adopted a policy which sets out the minimum operational standards, roles and responsibilities pertaining to Fitness & Probity.

All persons proposed for a PCF role must complete an Individual Questionnaire (IQ) providing details on their:

- experience
- qualifications
- reputation and character
- other responsibilities
- shareholding links to the Company

Qualifications and experience are double checked by the Compliance Officer against appropriate support and confirmation is obtained that the individual has no judgements or disqualifications against them. Certification is also provided by the individual that they will abide by the Standards of Fitness & Probity and the Guidance issued by the CBOI. Pending successful completion of these actions, the IQ is reviewed and approved by an existing PCF and submitted to the CBOI for processing and approval.

For each proposed PCF role, including key functions, the Company requires that the individual being proposed has the skills, knowledge and expertise commensurate with the role. This is assessed both in terms of the requirements for specific individual functions and also in terms of the composite when looking at the make-up of the overall Board. For functions which require specific qualifications or skills e.g. actuarial, only individuals who possess the necessary qualifications and experience in that field will be considered for the role. The Fitness & Probity of function holders is re-assessed on an annual basis.

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

The Company has taken appropriate actions to:

- embed risk management as a key function within its governance structure; and
- develop and maintain effective processes and reporting procedures to identify, measure, monitor, manage and report, on a continuous basis, the risks to which the Company is exposed.

Risk refers to the effect of uncertainty on the Company's ability to meet its objectives.

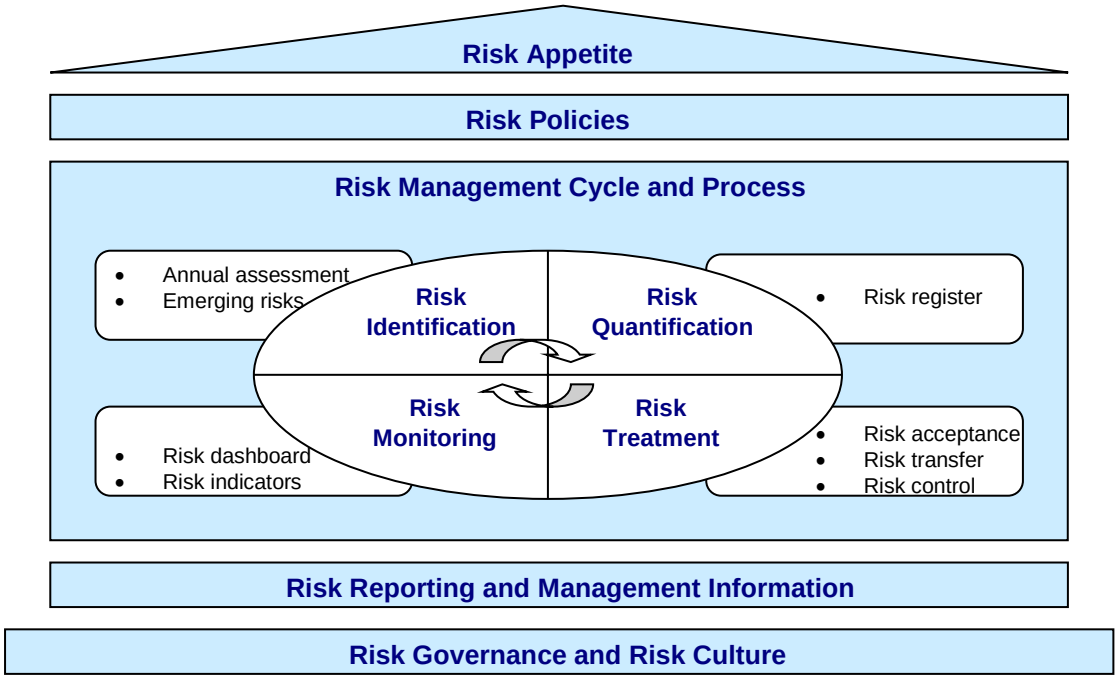
Risk management is a systematic approach to protect the business resources and income against losses and unexpected events so that objectives of the Company can be achieved without unnecessary disruption.

Roles and Responsibilities

The Board of Directors acknowledges its responsibility to establish a risk management system and have appointed a Chief Risk Officer ('CRO') who is responsible for carrying out the risk management function. This entails monitoring and managing the risks to which the Company is exposed and reporting to the Board on the Company's risks and the processes it has established to identify and manage risks; and ensuring that risk management is well integrated into the organisation structure of the Company and its decision-making processes.

Risk Management System

The Company's risk management system is made up of a number of components as illustrated below:



The Company's strategy towards risk is set out in its documented Risk Appetite Statement, and supporting Risk Policies. These are reviewed by the Board on an annual basis or in the event of a material change in circumstances for the Company or the environment in which it operates.

The Risk Appetite Statement adopted by the Board sets out the level of risk that the Company is prepared to accept in the pursuit of its strategic objectives. It defines:

- the Company's overall philosophy to risk taking and the expectations of shareholders;
- the Company's tolerance to loss of capital, profit volatility and other specified measures; and
- the risk limits that are acceptable in terms of exposures to different types of risk.

In addition to its financial results, the Company's performance is measured on a quarterly basis in terms of its compliance with the adopted Risk Appetite. A 'heat-map' reporting system is used to clearly illustrate where risks are within appetite or where various trigger levels have been breached and the appropriate escalation procedures followed.

Risks are categorised into six groups based on the interpretations within SI 485:

- Underwriting risk
- Market risk
- Credit risk
- Liquidity risk
- Operational risk
- Concentration risk

The key risks to which the Company is exposed have been identified by the Risk Management Function and agreed by the Board and will be re-assessed and validated annually by them in terms of the Company's risk appetite and tolerance for future strategy. A formal risk register has been developed and is reviewed by the CRO each quarter and by the Board at each Board meeting. Each identified risk has an owner assigned to it who is responsible for taking any action or implementing any changes identified by the CRO. Such actions/changes are recorded in the Board meeting minutes.

The Board of Directors has delegated the responsibility for reporting on compliance with the triggers established in the risk appetite, and the performance of the internal control framework, to the CRO who utilises management information supplied by the Management Services Provider.

An escalation mechanism is in place to ensure the timely reporting of breaches in triggers to the appropriate body. Reporting of management information on all key risks takes place at each Board meeting. All management information shall be:

i. timely;
ii. validated;
iii. comprehensive;
iv. reliable; and
v. presented in a manner that highlights any relevant issues.

Underpinning the risk management system is a governance framework and an organisational culture which embodies a high standard of accountability and ownership.

With respect to the management of risks identified in the Risk Appetite Statement and risk register, the following policies have been established by the Board:

- Conflicts of Interest
- Compliance
- Outsourcing
- Fitness and probity
- Underwriting and reserving
- Reporting of corporate governance deviations
- IT systems
- Remuneration
- Investment, liquidity and asset /liability management
- Own Risk and Solvency Assessment
- Capital management
- Internal control
- Internal audit
- Reporting

Review

The established risk management system is reviewed on an annual basis under the direction of the CRO. The review will take into account the results of the Company's annual Own Risk and Solvency Assessment and the insights gained during the performance of this assessment. Any proposed amendments/enhancements will be recommended for approval to the Board. The review will be carried out under the direction of the CRO, by the Management Services Provider, against the criteria of:

- Appropriateness
- Adequacy
- Relevance
- Transparency
- Accountability
- Legal/Regulatory Compliance

Own Risk and Solvency Assessment ('ORSA')

The key stakeholders and their relevant responsibilities with respect to the Company's ORSA are set out below:

The Board of Directors	
• Approve ORSA Policy and review annually for applicability • Implement business strategy in conjunction with parent company • Establish risk appetite and tolerances • Identify relevant stresses and scenarios for use in capital calculations • Reinsurance planning and structuring • Investment policy and asset allocation	• Challenge the ORSA assumptions and findings • Consider and assess the output from the ORSA processes and then develop the appropriate responses for the Company • Sign-off on ORSA prior to submission to the Central Bank of Ireland • Embed the ORSA as part of the Company's decision-making process

Shareholder	Chief Risk Officer (CRO)	Management Services Provider (MSP)	Actuarial Function (HoAF)	Internal Audit
• Set overall business strategy • Budgeting and business planning • Provide input into stress and scenario analysis	• Manage ORSA process • Manage stress and scenario testing • Oversee the setting of the risk appetite and tolerances • Oversee work of Management Services Provider in respect of the ORSA	• Profit & Loss account and Balance Sheet projections • Capital calculations • Conduct stress and scenario testing • Documentation and reporting	• Provide input into stress and scenario analysis • Provide opinion on ORSA process	• Consider review of the ORSA as part of their schedule of work

In line with the Company's documented ORSA policy and assuming business-as-usual conditions, the ORSA is performed on an annual basis during the third and fourth quarter of the Company's financial year so that the findings can be discussed and approved by the Board of Directors and reported to the CBOI prior to the calendar year-end. A more frequent ORSA is not deemed necessary due to the straightforward nature of the Company's activities and risk profile and the fact that the Company's financial position and solvency needs are not subject to significant volatility. The calendar of annual ORSA activities, by reference to the Company's financial year, is as follows:

Process Step	Description	Responsibilities	Timeframe
Step 1	Review of the documented policy and process as to how the forward-looking assessment is to be performed, by whom, how often and what is involved ('the ORSA policy').	Board	Quarter 4 (previous year)
Step 2	3-year financial business planning, considering relevant parameters (premium levels/products/expenses/claims/investment strategy)	MSP working with CRO/Company Office Manager/Esteve to define business plan assumptions	Quarter 3
Step 3	Identify via discussion, the stresses and scenarios that could impact the financial position, solvency and risk profile of the Company and also a scenario that could cause the business to fail	CRO/MSP to lead and facilitate discussion with the Board and document output. HoAF to review.	Quarter 3
Step 4	Solvency assessment • on the projected 31 December balance sheet under Solvency II calculations; and under • stresses and scenarios The output will be circulated to the Board for consideration and challenge and for the Board to draw its conclusions on the results of the assessment and any actions required.	MSP/HoAF Board	Quarters 3-4 Quarters 3-4
Step 5	Document the assessment in qualitative and quantitative terms including the methods and assumptions used and the conclusion of the assessment in an internal report for the Board to consider and approve.	MSP / HoAF / Board	Quarter 4 Board meeting(s) cycle to consider and review and approve
Step 6	Report to the CBoI via the on-line reporting tool	MSP	Within 2 weeks of the Board approval

In the event that certain defined triggers occur, the CRO will initiate the performance of an ad-hoc ORSA and will co-ordinate with the Management Services Provider to establish the scope (whether a full or partial assessment), time-frame and deadlines for its performance.

The triggers for an ad-hoc ORSA are:

- A change in the group structure, financial position or business profile that significantly changes the risk, business or solvency profile of the Company
- The launch of a new line of business
- A breach in a risk appetite limit
- A sudden significant reduction in the solvency ratio

The main objectives of the ORSA with respect to risk management are to:

1. Foster internal risk management within the Company.
2. Enhance management awareness of the interrelationships between risks
3. Increase understanding of the relationship between overall risk exposure and the capital needed to support it.

The ORSA process creates the link between risk management, capital management and strategic planning. The risks identified as part of the risk management system are used to inform the stress and scenario tests which form part of the solvency assessment. The resultant findings provide a better understanding to the Board of the impact of key risk drivers on the operations of the Company and in turn better inform the setting and update of the Risk Appetite.

The Company uses the ORSA process to determine its own solvency needs. This involves the:

- calculation of the required Solvency and Minimum Capital Requirements under the standard formula over a 3-year projection period based on the Company's budget for that period;
- application of stresses and scenarios across the projection period which are based on the key risk drivers for the Company (taken from risk appetite statement);
- consideration of an extreme stress scenario which includes a set of circumstances which could cause the business to fail;
- review of the output by the Board and refinement and recalculation to take account of alternative scenarios; and
- determination by the Board of a threshold level of solvency capital coverage appropriate for the Company's own needs over the planning period with a lower trigger set as a review point to determine whether the contributing circumstances indicate that a capital injection is required. These capital coverage levels have been incorporated into the Company's Risk Appetite Statement.

B.4 Internal control system

Internal control system

The Company has established and documented an appropriate system of internal control which satisfies the following objectives:

- Operational risks are identified and effectively managed
- Key processes and activities are documented
- Assets are safeguarded
- The reliability and integrity of financial information is maintained consistently
- Compliance with Company policies, procedures, applicable laws and regulation is achieved

All accounting and expense transactional procedures of the Company are fully documented and maintained in a procedures document which forms part of the Company's permanent files. This document is updated on an annual basis by the Management Services Provider to ensure accuracy and on-going relevance and is presented to the Board.

An Operational Risk Assessment and Control Framework has been established for the Company. This reflects the operational risks which have been identified by the Risk Management Function and agreed by the Board as relevant to the Company's operations, together with the activities and internal processes in place for managing those risks. On a quarterly basis, compliance against this framework is documented in a log. At each Board meeting, the most recent quarterly completed Operational Controls Logs are presented to the Board for review. The appropriateness of this framework is re-assessed by the CRO and the Board on an annual basis. The risk tolerance limit for operational risk and the breach escalation process is included within the Company's Risk Appetite Statement.

Controls established reflect the following principles:

- Segregation of duties
- Authorisation and approval
- Custodial and security arrangements
- Timely and accurate review and reconciliation

There have been no control issues or weaknesses identified in the reporting period.

Compliance function

The Company is fully committed to compliance with the requirements of the CBOI and all applicable legislation and regulations (collectively known as the Company's 'Compliance Obligations'). To ensure that the Company's activities remain within the boundaries of these Compliance Obligations the Board of Directors has appointed a Head of Compliance / Compliance Officer to assume responsibility for the discharge of the Company's Compliance Function.

The Company interprets "applicable legislation and regulations" as follows:

> "any legislation and regulations which a company must comply with in order to represent a true and fair reflection of its financial performance or which forms an explicit condition of the business license that the entity holds".

In order to demonstrate the Company's ongoing commitment to compliance, a submission is made by the appointed Compliance Officer to the Board of Directors at each Board meeting. This report addresses how the Company is achieving compliance, whether there are any breaches and how such breaches are being rectified.

The Compliance Function is reinforced by a formal framework of compliance checklists which are reviewed by the Compliance Officer, who will then report to the Board on the results of this review at each Board meeting. A compliance action list is considered and addressed by the Board and the considerations recorded in the minutes.

Notwithstanding the fact that the role of Compliance Officer/Compliance Function has been outsourced to a third party, the Board acknowledges that it retains all responsibility for the management of risk in this area.

B.5 Internal audit function

The Board has the responsibility to establish and maintain an effective internal audit function which is objective and independent from the Company's operational functions.

The Head of Internal Audit (HoIA) is the Internal Audit Manager for the Parent Group and is responsible for:

- leading the preparation of an annual audit plan for the Company based on a methodical assessment of the Company's risks, governance system and the nature of its activities, including expected developments;
- leading the implementation of the annual internal audit plan;
- directing the work of any outsourced service providers who have been engaged to carry out internal audit testing;
- ensuring that the requirements of the Company's outsourcing policy are complied with for the selection of parties to perform internal audit testing;
- reviewing the output of annual internal audit testing; and
- reporting findings to the Board and the other Key Functions.

The HoIA may also carry out special audit tasks at the request of the Board where significant breaches in the Company's policies or internal control framework have been identified.

The Board recognises the added value to be derived from internal audit through the review and assessment of compliance with, and the efficacy of, its governance arrangements and operational procedures.

An internal audit plan, comprising a programme of proportionate audits of internal controls, governance arrangements and operational procedures will be developed, implemented and reviewed annually.

The internal audit function is structured according to the following principles:

- the HoIA has the necessary skills and expertise required for the role and meets the Fitness & Probity due diligence criteria;
- the Company has taken appropriate measures to mitigate the risk of any conflict of interest within the internal audit function;
- the HoIA does not perform any operational functions for the Company and is free from undue influence by any other key functions;
- the Board shall not place undue influence on the HoIA in the performance of its duties; and
- the internal audit approach shall be proportionate ensuring that the responsibilities of the function are fulfilled while recognising the small scale of the Company.

The Company recognises the value in seeking external, professional support as part of its internal audit programme and appropriate external resources will be engaged to work under the direction of the HoIA for areas where specialist knowledge is not available in-house.

B.6 Actuarial function

The outsourcing of the actuarial function reflects the fact that, as a captive reinsurer, the Company does not have the in-house specialist skills required for this function. The engagement of an industry specialist who has the support of a wider team in carrying out their duties is the most efficient approach for the Company. The Board is satisfied that there are no conflicts of interest impacting the work of the Head of Actuarial Function (HoAF).

The position of Head of Actuarial Function (HoAF) for the Company was outsourced to Dr. Dermot Marron of Allied Risk Insurance and Reinsurance Services Limited during the reporting period. However, effective 28 January 2019 and following approval from the CBOI to perform this function, Dr. Marron has been replaced by his colleague, Mr Chris Gibney. Dr Marron still retains oversight responsibility for all work.

A documented services level agreement is in place for this function. The HoAF reports directly to the Board.

B.7 Outsourcing

The Company has a documented outsourcing policy which the Board reviews on an annual basis as part of its scheduled review of the Company's CGM. This policy is specific to the Company and outlines its approach to the identification, justification, implementation and management of outsourcing arrangements for any Company function. The policy sets out the operational standards and roles and responsibilities with respect to outsourcing and the approach to be adopted for:

- Business needs analyses
- Due diligence
- Contracts
- Implementation of outsourcing arrangements
- Ongoing monitoring and oversight
- Decommissioning

In line with EIOPA's guidelines on the System of Governance, the following four key functions of the system of governance are deemed critical or important functions and have been identified as such in the Company's outsourcing policy:

  - Risk Management
  - Internal Audit
  - Actuarial
  - Compliance

All four key functions are outsourced either to individuals within the parent group or third-party service providers. In addition, the Company considers Captive Management & Administration (including financial and regulatory reporting) to be a critical and important outsourced function.

Third-party service providers for outsourced functions are located in Ireland and Group personnel in Spain.

B.8 Any other information

The Board considers that the Company's system of governance is adequate and appropriate for the nature, scale and complexity of the risks associated with the Company's operations. The development of the system of governance, as documented in the Company's CGM and supporting policies, has been carried out in such a manner to ensure that the framework, policies and procedures are tailored to the Company's specific risks and are fit for purpose.

The appropriateness of the system of governance is formally reviewed on an annual basis by the Board and documented via the minutes of the meeting at which the updates/changes are approved. Responsibility for ensuring that this review is completed on a timely basis rests with the Head of Compliance.

No other material information to report.

C. Risk Profile

C.1 Underwriting Risk

The Company is exposed to underwriting risk which can arise from large losses, inadequate pricing or an adverse change in the value of insurance liabilities due to inadequate provisioning assumptions. The specific underwriting risks to the Company are assessed by a thorough review of all proposed annual programmes of reinsurance with reference to:

- Event and annual aggregate limits
- Loss history
- Premium levels
- Material changes to Group organisation and strategy
- Company costs
- Findings from the ORSA process
- Consideration of the need for retrocession
- Risk diversification
- Alignment with the Company's Risk Appetite

The Company assesses the risk of inadequate provisioning by evaluating the outturn over time of claims settlements against initial provisions.

There have been no changes to the basis by which the Company's underwriting risk exposures are assessed in the reporting period. The aggregate limits deployed by the captive remained unchanged from the prior reporting period.

The reinsurance programme is relatively short tail in nature and the ultimate cost of loss events can usually be estimated with reasonable certainty based on the information available.

The Company is only accepting the underwriting risk of effectively one policyholder, its parent group. Therefore, there can be no stacking or clash concentration risks which one would find in commercial reinsurers. While the majority of risks arise in Spain, there is diversification within the trade credit business amongst the underlying customers and their country of origin. Diversification is also achieved through the different lines of business reinsured and the fact that the claims drivers for such lines tend not to be highly correlated.

Underwriting risk is managed through:

- the adoption of documented controls and policies in relation to the underwriting and reserving processes;
- the setting of a risk appetite by the Board with reporting triggers and limits which are monitored and escalated as in accordance with the Company's documented policy;
- the deployment of event and annual aggregate limits for the risks it reinsures which can be met through the Company's capital base; and
- the calculation of technical provisions in a prudent, reliable and objective manner using appropriate and consistent data.

The Company assesses the adequacy of premium to cover claims and associated expenses through its review of quarterly financial reports and by reviewing the loss and combined ratios applicable to the various lines of business for individual policy years. Performance against the loss ratio appetite and triggers in the risk appetite statement is measured on a quarterly basis and reviewed by the Chief Risk Officer. These review processes ensure that the mechanisms adopted by the Company for the management of underwriting risk are monitored for continuing effectiveness.

As part of the Company's ORSA process, stress and scenario tests incorporating worsening claims exposure and changes in reinsured underwriting limits are considered. Three scenarios were considered in the 2018 ORSA:

- Scenario 1 - Loss ratio of 15% for non-proportional property and 0% on the other lines of business for all projection years

- Scenario 2 - Loss ratio of 50% for non-proportional property, 30% for credit & suretyship and 10% on the other lines of business for 2020. Average loss ratios of 20% for each of non-proportional property and credit & suretyship and 10% across each of the other lines of business in years 2019 and 2021.
- Scenario 3 (extreme stress test) – EUR3m losses on credit & suretyship, EUR2m for non-proportional property, EUR2m loss on general liability and EUR500k losses on each of the casualty and miscellaneous financial loss lines of business. These losses occur in 2019. Average loss ratios of 20% for each of non-proportional property and credit & suretyship and 10% across each of the other lines of business in years 2020 and 2021.
- Under all scenarios, all claims notified in each year were assumed settled in the following year.

The capital requirements for non-life underwriting risk were not significantly different for Scenario 1 and 2 as compared with the base (unstressed) scenario. Under scenario 3, the capital requirements for underwriting risk more than doubled in 2019 but reverted to comparable levels with the base scenario in years 2020 and 2021.

In addition, the Company carried out sensitivity tests showing the impact on profit before tax and shareholders' equity in the financial statements. For each item tested the impact of a change in a single factor is shown, with other assumptions unchanged.

	Pre-tax profit		Shareholders' equity	
	2018	2017	2018	2017
	EUR	EUR	EUR	EUR
12.5% increase in loss ratios				
- Gross and net	(78,294)	(28,664)	(68,507)	(25,081)
Doubling of prudential margin				
- Gross and net	-	(81,416)	-	(71,239)

The Company's method for sensitivity testing is consistent for both years.

The Board has taken on the findings of these stress and sensitivity tests in its decision making.

C.2 Market Risk

The Company is exposed to market risk as part of its business by virtue of:

- Currency risk – The Company is exposed to currency risk by underwriting risks in a currency other than Euro.
- Interest rate risk – which may arise due to a mismatch in asset / liability durational matching.
- Concentration risk – where the quantum of an individual asset is such that its impairment would have a significant impact on the Company
- Spread risk – which can arise from assets held due to changes in credit spreads over the risk-free interest rate term structure.

Currency risk is due to the inclusion of US risks in the reinsurance programme. This risk is mitigated by retaining assets in the same currency as the liabilities.

As the majority of claims exposures are short-tail in nature, the Company mitigates against interest rate risk by holding sufficient funds in short term deposits and liquid cash.

A risk appetite with appropriate reporting and escalation triggers has been set for the desired credit rating for credit institutions with which funds are placed.

With the exception of concentration risk, the market risks to which the Company is exposed are not considered material to its overall financial and solvency position and are not subjected to specific stress and sensitivity testing. In the prevailing market of negligible interest rates, a sensitivity analysis of a +/- 10% change in interest rates would have an immaterial impact on the Company's income.

Concentration risk arose from the intercompany loan advanced to Corporación Químico Farmaceútica Esteve S.A. but this arrangement was terminated in December 2018.

Prior to any decision being made concerning the investment of surplus funds, the implications on the Company's Solvency Capital Requirement and Minimum Capital Requirement are calculated and assessed to ensure that the proposed action is within appetite.

Prudent person principle

The Company has adopted a written investment policy which it reviews on an annual basis. The overall strategic objective of the Company with respect to its investment policy is to preserve principal value and increase the value of investments while covering its technical reserve and solvency capital requirements and meeting its ongoing cash flow needs.

The Board has developed the investment policy having due regard to:

- the Company's solvency needs;
- the nature of the risks being underwritten by the Company;
- the regulatory requirements to match its technical liabilities;
- the expected pay-out patterns for claims;
- market, credit, liquidity, operational and legal risk;
- the need to invest in secure assets;
- asset diversification; and
- settlement risk.

The guiding principles of the policy are as follows:

- To meet all liabilities as they fall due by matching term, nature and currency of investments to the term, nature and currency of the liabilities;
- Investments should be diversified and adequately spread with counterparties that meet the rating criteria specified in the investment policy;
- To maximise the investment return subject to the constraints imposed.

The Board of Directors, having taken account of those factors set out above, has deemed that funds received by the Company should only be invested according to the following categories:

1. Short Term Deposits (< 1 year) with EU banks with a minimum credit rating of BBB;
2. French & German Government Bonds for terms of up to 1 year;
3. Corporate bonds with a minimum credit rating of BBB for terms of up to 3 years;
4. Loans to affiliate companies.

The investment policy contains procedures to be followed in the event of an asset downgrade. Minimum credit ratings are prescribed within the policy together with guidelines on currency exposure.

The assets and liabilities of the Company are managed in order to protect it from any materially negative financial consequences arising from changes in interest rates. The profile of the risk underwritten by the Company is such that approximately all claims are paid out within 2 years from the end of the related underwriting period. For this reason, the Company is not exposed to significant claims inflation and it is therefore considered appropriate to hold investments in short term instruments.

C.3 Credit Risk

The primary area of credit risk under Solvency II arises from the credit institutions with which the Company places its cash assets. This has been identified as part of the process for setting the Company's risk appetite and appropriate tolerances and limits put in place. Monitoring against pre-determined triggers is carried out by the Chief Risk Officer on a quarterly basis. In order to avoid risk concentration cash is placed with more than one counterparty.

Prior to any decision being made to change the mix of and/or exposure to counterparties, the implications on the Company's Solvency Capital Requirement and Minimum Capital Requirement are calculated and assessed to ensure that the proposed action is within appetite.

As part of the Company's ORSA process, the sensitivity of the cash balances to changes in ratings was assessed. A reduction of ratings by two credit steps to credit quality step 4 drove a 24% increase in the capital requirement for counterparty default risk when compared to the base (unstressed) scenario.

In order to manage this risk, the Company's investment policy, described in C2 above, also sets out the criteria for the selection of counterparties for the placement of cash balances.

C.4 Liquidity risk

A large proportion of funds are held in cash/short-term deposits ensuring sufficient cash is on hand to meet claims payments as they fall due and to cover any unexpected cash outflows.

The Board has taken the decision that a further refinement in the matching of claims pay-out and asset maturity patterns is not required given the relatively short tail nature of the business. Thus, the maintenance of available cash and short-term deposits is the most appropriate for the nature, scale and complexity of the Company's business.

The total amount of expected profit included in future premiums as at 31 December 2018 is EURnil due to the non-renewal of the reinsurance programme in underwriting year 2019 (2017: EUR1,250,988).

C.5 Operational risk

Operational risks to which the Company is exposed have been assessed using the Operational Risk Assessment and Control Framework described in Section B4 above. There have been no changes to this approach during the reporting period.

The Company does not consider that it is exposed to material residual risk in this area due to the formality that has been created around the Company's processes and procedures including those for financial and regulatory reporting. However, the Company has taken appropriate measures to address this through the deployment of additional resources and the development of new control checks and balances.

There is no specific risk concentration associated with this category as internal controls include appropriate segregation of duties.

C.6 Other material risks

There are no other material risks to which the Company is exposed.

C.7 Any other information

There are no other items to report in this area.

D. Valuation for Solvency Purposes

D.1 Assets

The Company's total assets at 31 December 2018 of EUR12,243,164 comprise the following items:

	2018	2017
Deferred Tax Asset	EUR9,528	EUR0

A deferred tax asset of EUR9,528 has been calculated based on 12.5% of the undiscounted adjustments (excluding receivables) to the technical provisions referenced in Section D.2.

Deposits other than cash equivalents	EUR11,538,100	EUR9,498,619

This balance represents the fair value of deposits with counterparty banks together with any accrued interest at the balance sheet date. For the purposes of the Company's financial statements, accrued interest is shown as part of the 'Prepayments and accrued income' balance. The valuation is based on the amounts placed on deposit at the year-end together with a calculation of the portion of interest accrued at that time.

Other mortgages and loans	EUR30,317	EUR4,047,196

This amount represents the accrued interest on the loan advanced to Corporación Químico Farmaceútica Esteve S.A. ('Esteve') at the balance sheet date. The principal amount was repaid in December 2018. The accrued interest is valued at fair value being the amount calculated at the agreed interest rate up to the date of repayment of the principal balance.

Insurance and intermediaries' receivables	EUR0	EUR0

Under Solvency II, the insurance and intermediaries receivable amount of EUR318,857 as disclosed in the financial statements, must be subtracted from the best estimate technical provisions (refer to Section D2 below). There is a negligible probability of default and so no allowance has been made for doubtful debts.

Cash & cash equivalents	EUR657,019	EUR1,445,872

The balance represents cash balances held with counterparty banks which are valued at the fair value amounts held at the year-end.

Any other assets, not elsewhere shown	EUR8,201	EUR9,334

This balance relates to prepayments and is not considered material.

Other than the inclusion of (i) accrued interest and (ii) insurance and intermediaries' receivables in different categories for Solvency II purposes, there are no other asset valuation differences between the financial statements and the solvency calculations. The financial statements have been prepared in accordance with Financial Reporting Standards 102 and 103 (FRS 102 and 103), the requirements of the Companies Acts 2014 and the European Union (Insurance Undertakings: Financial Statements) Regulations, 2015.

Information on how the Company invests its assets and manages risk in this area, including how it achieves compliance with the 'prudent person principle', is set out in Sections C2 – C4 above. Operational risks relating to the Company's assets are managed using the Operational Risk Assessment and Control Framework described in Section B4 above.

D.2 Technical provisions

The technical provisions at 31 December 2018 comprise the following amounts by line of business:

	Gross and net best estimate EUR	Risk margin EUR	Total gross and net technical provisions EUR
Proportional – General Liability	41,999	2,131	44,130
Non-Proportional Casualty	38,299	3,763	42,062
Proportional – Misc. Financial Loss	32,161	3,160	35,321
Non-Proportional Property	197,324	19,386	216,710
Proportional- Credit & Suretyship	46,181	4,283	50,464
Total	**355,964**	**32,722**	**388,686**

Comparative technical provisions at 31 December 2017 by line of business were:

	Gross and net best estimate EUR	Risk margin EUR	Total gross and net technical provisions EUR
Proportional – General Liability	(203,571)	19,651	(183,920)
Non-Proportional Casualty	(136,913)	17,905	(119,008)
Proportional – Misc. Financial Loss	(143,488)	13,934	(129,554)
Non-Proportional Property	(622,402)	115,069	(507,333)
Proportional- Credit & Suretyship	(56,958)	26,998	(29,960)
Total	**(1,163,331)**	**193,557**	**(969,774)**

The line of business analysis used to segment the Company's claims data reflects the underlying risks and contract structures for the reinsurance business being accepted by the Company. This is consistent throughout the reporting period.

Best estimate claims provisions have been calculated based on the expected losses in each underwriting year by reference to reported and paid losses, historical experience and benchmark data to ensure claims incurred but not reported and claims incurred but not enough reported have been considered in setting the provisions.

Due to the non-renewal by the Esteve Group of the reinsurance programme for 2019, no best estimate premium provisions for business written but not yet incepted as at 31 December 2018, is applicable.

Best estimates have been adjusted to allow for all possible outcomes through the inclusion of provisions for future expenses that will be incurred in servicing the existing reinsurance obligations. The resultant future cash flow projections were then discounted, applying the yield curve published by EIOPA for December 2018

This approach reflects the nature, scale and complexity of the Company's business as a captive reinsurer and the nature of the underlying risks which are mostly short tail in nature.

The reinsurance contract is co-terminus with the reporting period end and as a result there is no unexpired risk, unearned premium or lapse provision at 31 December.

There is no retrocession applicable to this business.

The risk margin is calculated using Method 1 from Guideline 61 of the Solvency II "Guidelines on the valuation of technical provisions". The Solvency Capital Requirement used in this calculation relates to non-life underwriting risk and operational risk only.

The material difference between the calculation of technical provisions for solvency purposes and the financial statements is the addition of the following amounts in the Solvency II calculations:

(Amounts expressed in EUR)

	2018	2017
Removal of margin for uncertainty / claims handling provision	-	(81,416)
Risk margin on technical provisions	32,722	193,557
Receivables included in claims provision	(318,857)	(237,901)
Provision for Events Not In Data in claims provision	-	81,763
Provision for expenses in claims provision	44,946	15,538
Premium provision for written but not yet incepted business	-	(1,498,191)
Provision for expenses in premium provision	-	103,924
Provision for Events Not In Data in premium provision	-	145,224
Discounting of technical provisions	(1,444)	(2,969)
	(242,633)	(1,280,470)

An implicit allowance for Events Not in Data (ENID) has been accounted for within the best estimate calculation this period so that no further explicit allowance is required. Otherwise, there were no material changes to the relevant assumptions applied in calculating this period's technical provisions compared to last period.

The Company considers the approach adopted to be appropriate and the resultant calculated technical provisions to be adequate. While actual experience can differ from the expected outcome, the underlying claims are not exposed to significant volatility given the nature of the business. The level of uncertainty associated with the value of technical provisions is therefore not considered significant.

Information on how the Company manages risk in the area of underwriting and reserving is set out in Section C1 above. Operational risks relating to the Company's technical provisions and claims data are managed using the Operational Risk Assessment and Control Framework described in Section B4 above.

The Company is satisfied that it has access to sufficient historical claims data by line of business for the calculation of its technical provisions and that this data is accurate and appropriate for the Company's needs.

Claims data has been compiled on a consistent basis for the last 11 years and is received and recorded on a timely basis and considered free from material error. The Company's claims data is inherently sparse given the nature, scale and complexity of its captive reinsurance business. However, this is not an impediment to the setting of its technical provisions.

Claims management processes by the Company and the cedant are appropriate and adequate given the nature of the underlying risks. Significant reporting delays are not experienced.

The following items are not used by the Company in its calculation of technical provisions:

- the volatility adjustment referred to in Article 77d of Directive 2009/138/EC;
- the transitional risk-free interest rate-term structure referred to Article 308c of Directive 2009/138/EC; and
- the transitional deduction referred to in Article 308d of Directive 2009/138/EC.

D.3 Other liabilities

Other liabilities of EUR343,515 (2017: EUR136,199) comprise corporation tax payable of EUR7,783 (2017: EUR90,488), expense accruals of EUR52,650 (EUR45,711) and a provision for wind down of the business of EUR283,082 (2017: EUR0). These amounts are valued on the same basis as used in the financial statements and are expected to be settled within one year. Balances have not been discounted and are considered to be the fair value amounts.

D.4 Alternative methods for valuation

There are no items to report in this area.

D.5 Any other information

There are no other items to report in this area.

E. Capital Management

E.1 Own funds

The primary capital management objectives of the Company are to maintain a strong capital base to support the development of its business and to meet regulatory and solvency capital requirements at all times. It is intended that the Company's capital needs will be managed out of its existing pool of own funds and the efficient management of the Company's reinsurance business. Should additional funds be required outside of that, they will be advanced by the shareholder. The Company's documented capital management policy outlines the Company's approach to distributions and its medium-term capital management plan. There have been no material changes to this approach from the prior year.

Distributions will only be considered in those circumstances where the Company is deemed to have surplus funds over and above those required for its own solvency needs. Whilst being mindful that the Company is part of a wider Group, it is the Board's responsibility to ultimately determine whether it is appropriate for the Company to declare a dividend to its sole shareholder. In assessing whether to declare a dividend, the Board will take account of the financial position of the Company, its Risk Appetite tolerances and limits, its own assessment of its regulatory capital requirements (current and forward looking over a three-year planning horizon) as well as its liquidity position.

At 31 December 2018 and 2017 the Company's own funds in Euro were as follows:

	2018	2017
Tier 1 – unrestricted		
Ordinary share capital	1,000,000	1,000,000
Reconciliation reserve	10,501,436	14,704,276
Tier 3 – Net deferred tax asset	9,528	-
Total basic own funds	**11,510,964**	**15,704,276**

The movement in basic own funds reflects a distribution of EUR4m made during the reporting period, together with the profits of the Company as adjusted for Solvency II valuation items. The reconciliation reserve represents the retained earnings of the Company as adjusted for Solvency II valuation differences. The deferred tax asset has been calculated based on 12.5% of the undiscounted adjustments (excluding receivables) to the technical provisions referenced in Section D.2.

The eligible amount of own funds available at 31 December 2018 to cover the Solvency Capital Requirement is EUR10,510,964 of Tier 1 unrestricted and Tier 3 funds. The Minimum Capital Requirement is covered by eligible Tier 1 unrestricted funds of EUR11,501,436.

The equity position shown in the Company's financial statements at 31 December 2018 can be reconciled to the basic own funds balance as follows:

(Amounts expressed in EUR)	**2018**	**2017**
Shareholder's funds per the financial statements	11,577,660	14,792,028
Removal of margin for uncertainty / claims handling provision	-	81,416
Risk margin on technical provisions	(32,722)	(193,557)
Provision for Events Not In Data in claims provision	-	(81,763)
Provision for expenses in claims provision	(44,946)	(15,538)
Premium provision for written but not yet incepted business	-	1,498,191
Provision for expenses in premium provision	-	(103,924)
Provision for Events Not In Data in premium provision	-	(145,224)
Discounting of technical provisions	1,444	2,969
Net deferred tax asset / (liability)	9,528	(130,321)
Immaterial rounding	-	-
Total basic own funds	**11,510,964**	**15,704,276**

The most significant reconciling items relate to the different basis of reserving for technical provisions under Solvency II. The inclusion of a risk margin is to ensure that the value of technical provisions is equivalent to the amount (re)insurance undertakings would require to take over and meet the Company's reinsurance obligations. A provision has been included for expenses that will be incurred in servicing existing reinsurance obligations.

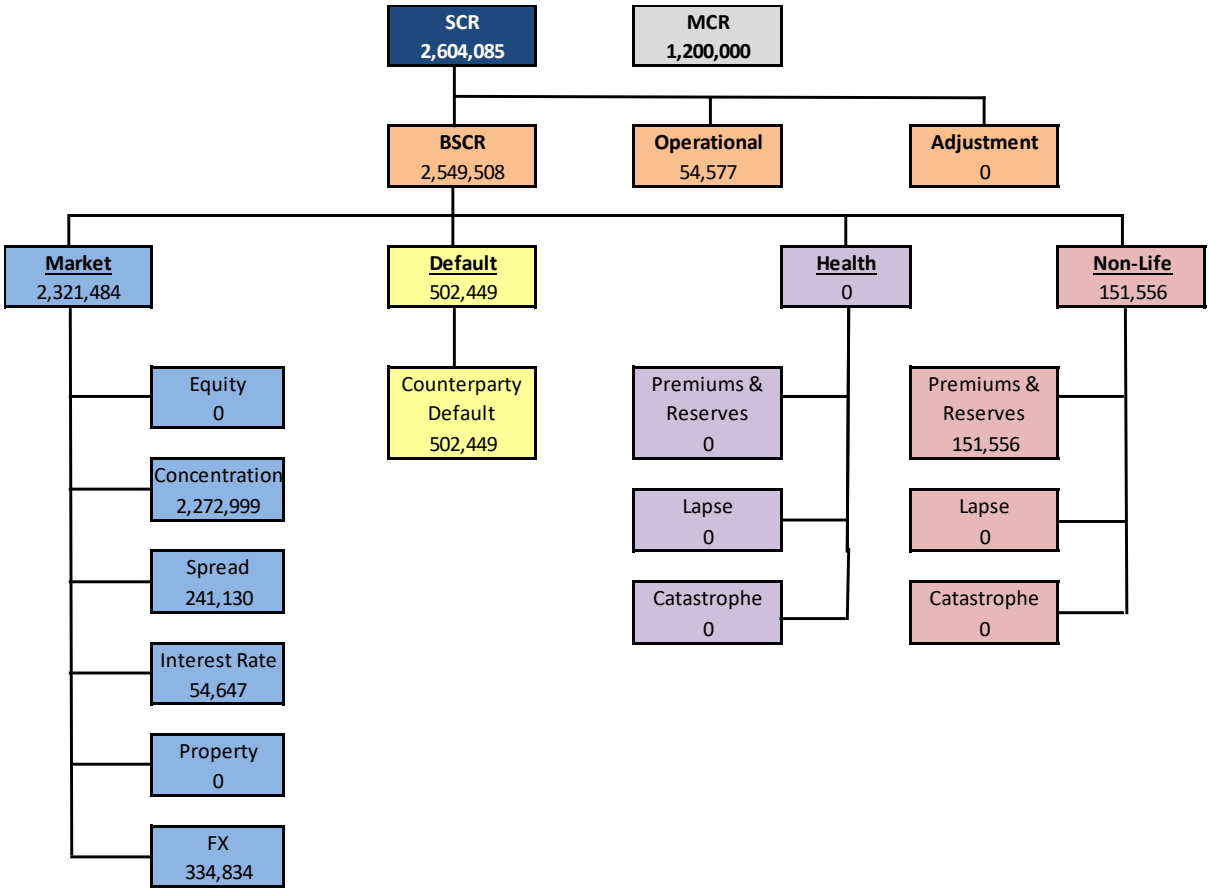
The adjustment for discounting is not significant due to the short tail nature of the business. The deferred tax adjustment is calculated at 12.5% of the undiscounted adjustments to the technical provisions.

E.2 Solvency Capital Requirement and Minimum Capital Requirement

The Company's 31 December 2018 Solvency Capital Requirement (SCR) and Minimum Capital Requirement (MCR) are shown in the table below.

	SCR		MCR	
	2018	**2017**	**2018**	**2017**
Capital required (EUR)	2,604,085	5,215,466	1,200,000	1,303,867

The SCR has been calculated utilising the standard formula and the analysis by risk module for 2018 is shown below:



In the non-life risk module, the risk margin on the technical provisions has been calculated using EIOPA's technical simplification 1. This is considered appropriate given the nature, scale and complexity of the Company's reinsurance business. The Company has not utilised undertaking specific parameters.

The MCR equates to the absolute capital floor for non-life reinsurance obligations:

Minimum Capital Requirement (MCR)

MCR	1,200,000

Total MCR NL	329,458
Cap	1,171,838
Floor	651,021

Parameters	
Cap	45%
Floor	25%
AMCR	1,200,000

Line of Business	Net Technical Provisions	Net Premium Written	Paremeters		MCR NL
			α	β	
General liability insurance	41,999	227,070	10%	13%	34,072
Credit & Suretyship	46,181	203,404	18%	11%	31,159
Miscellaneous Financial Loss	32,161	172,771	19%	12%	27,060
NRP - Property	197,324	1,044,857	19%	16%	202,835
NPR - Casualty	38,299	171,126	19%	16%	34,333

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

The Company is not using the duration-based equity risk sub-module in the calculation of its SCR.

E.4 Differences between the standard formula and any internal model used

The Company has only used the standard formula for its capital calculations.

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

The Company was compliant with its obligations to meet its Solvency and Minimum Capital Requirements in the period under review and the prior comparative period.

E.6 Any other information

There are no other items to report in this area.

Note: Tables within this report contain minor rounding differences in certain instances due to amounts being displayed as whole numbers while the source workings underlying the annual reporting templates are calculated to two decimal places. These differences are immaterial.

Quantitative Reporting Templates

Annex I
S.02.01.02
Balance sheet

		Solvency II value
Assets		**C0010**
Intangible assets	**R0030**	
Deferred tax assets	**R0040**	10
Pension benefit surplus	**R0050**	
Property, plant & equipment held for own use	**R0060**	
Investments (other than assets held for index-linked and unit-linked contracts)	**R0070**	11,538
Property (other than for own use)	**R0080**	
Holdings in related undertakings, including participations	**R0090**	
Equities	**R0100**	
Equities - listed	**R0110**	
Equities - unlisted	**R0120**	
Bonds	**R0130**	
Government Bonds	**R0140**	
Corporate Bonds	**R0150**	
Structured notes	**R0160**	
Collateralised securities	**R0170**	
Collective Investments Undertakings	**R0180**	
Derivatives	**R0190**	
Deposits other than cash equivalents	**R0200**	11,538
Other investments	**R0210**	
Assets held for index-linked and unit-linked contracts	**R0220**	
Loans and mortgages	**R0230**	30
Loans on policies	**R0240**	
Loans and mortgages to individuals	**R0250**	
Other loans and mortgages	**R0260**	30
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**	
Reinsurance receivables	**R0370**	
Receivables (trade, not insurance)	**R0380**	
Own shares (held directly)	**R0390**	
Amounts due in respect of own fund items or initial fund called up but not yet paid in	**R0400**	
Cash and cash equivalents	**R0410**	657
Any other assets, not elsewhere shown	**R0420**	8
Total assets	**R0500**	12,243

Annex I
S.02.01.02
Balance sheet

		Solvency II value
Liabilities		**C0010**
Technical provisions – non-life	**R0510**	389
Technical provisions – non-life (excluding health)	**R0520**	389
TP calculated as a whole	**R0530**	
Best Estimate	**R0540**	356
Risk margin	**R0550**	33
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**	
Technical provisions - health (similar to life)	**R0610**	
TP calculated as a whole	**R0620**	
Best Estimate	**R0630**	
Risk margin	**R0640**	
Technical provisions – life (excluding health and index-linked and unit-linked)	**R0650**	
TP calculated as a whole	**R0660**	
Best Estimate	**R0670**	
Risk margin	**R0680**	
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**	
Derivatives	**R0790**	
Debts owed to credit institutions	**R0800**	
Financial liabilities other than debts owed to credit institutions	**R0810**	
Insurance & intermediaries payables	**R0820**	
Reinsurance payables	**R0830**	
Payables (trade, not insurance)	**R0840**	
Subordinated liabilities	**R0850**	
Subordinated liabilities not in BOF	**R0860**	
Subordinated liabilities in BOF	**R0870**	
Any other liabilities, not elsewhere shown	**R0880**	344
Total liabilities	**R0900**	732
Excess of assets over liabilities	**R1000**	11,511

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

		Line of Business for: **non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)**						Line of business for: **accepted non-proportional reinsurance**			Total
		Medical expense insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Casualty	Marine, aviation, transport	Property	
		C0010	**C0080**	**C0090**	**C0100**	**C0110**	**C0120**	**C0140**	**C0150**	**C0160**	**C0200**
Premiums written											
Gross - Direct Business	**R0110**										
Gross - Proportional reinsurance accepted	**R0120**		227	203			173				603
Gross - Non-proportional reinsurance accepted	**R0130**							171		1,045	1,216
Reinsurers' share	**R0140**										
Net	**R0200**		227	203			173	171		1,045	1,819
Premiums earned											
Gross - Direct Business	**R0210**										
Gross - Proportional reinsurance accepted	**R0220**		227	203			173				603
Gross - Non-proportional reinsurance accepted	**R0230**							171		1,045	1,216
Reinsurers' share	**R0240**										
Net	**R0300**		227	203			173	171		1,045	1,819
Claims incurred											
Gross - Direct Business	**R0310**										
Gross - Proportional reinsurance accepted	**R0320**		39				30				69
Gross - Non-proportional reinsurance accepted	**R0330**							36		216	252
Reinsurers' share	**R0340**										
Net	**R0400**		39				30	36		216	321
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**		10	18			8	8		48	92
Other expenses	**R1200**										561
Total expenses	**R1300**										653

Annex I
S.05.02.01
Premiums, claims and expenses by country

		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		US					
		C0080	C0090	C0100	C0110	C0120	C0130	C0140
Premiums written								
Gross - Direct Business	R0110							
Gross - Proportional reinsurance accepted	R0120	400	203					603
Gross - Non-proportional reinsurance accepted	R0130	1,216						1,216
Reinsurers' share	R0140							
Net	R0200	1,616	203					1,819
Premiums earned								
Gross - Direct Business	R0210							
Gross - Proportional reinsurance accepted	R0220	400	203					603
Gross - Non-proportional reinsurance accepted	R0230	1,216						1,216
Reinsurers' share	R0240							
Net	R0300	1,616	203					1,819
Claims incurred								
Gross - Direct Business	R0310							
Gross - Proportional reinsurance accepted	R0320	69						69
Gross - Non-proportional reinsurance accepted	R0330	252						252
Reinsurers' share	R0340							
Net	R0400	321						321
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	74	18					92
Other expenses	R1200							561
Total expenses	R1300							653

Annex I
S.17.01.02
Non-life Technical Provisions

		Direct business and accepted proportional reinsurance				Accepted non-proportional reinsurance			Total Non-Life obligation
		Medical expense insurance	General liability insurance	Credit and suretyship insurance	Miscellaneous financial loss	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance	
		C0020	**C0090**	**C0100**	**C0130**	**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**								
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**								
Claims provisions									
Gross	**R0160**		42	46	32	38		197	356
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**		42	46	32	38		197	356
Total Best estimate - gross	**R0260**		42	46	32	38		197	356
Total Best estimate - net	**R0270**		42	46	32	38		197	356
Risk margin	**R0280**		2	4	3	4		19	33
Amount of the transitional on Technical Provisions									
Technical Provisions calculated as a whole	**R0290**								
Best estimate	**R0300**								
Risk margin	**R0310**								
Technical provisions - total									
Technical provisions - total	**R0320**		44	50	35	42		217	389
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**		44	50	35	42		217	389

Annex I
S.19.01.21
Non-life Insurance Claims Information

Total Non-Life Business

Accident year / Underwriting year	**Z0020**	Underwriting year [UWY]

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**	
2009	**R0160**		33										**R0160**	33
2010	**R0170**					45							**R0170**	45
2011	**R0180**			67		17							**R0180**	84
2012	**R0190**	69	179	33	206								**R0190**	488
2013	**R0200**		56	188	13	-16							**R0200**	240
2014	**R0210**	33											**R0210**	33
2015	**R0220**		94	87									**R0220**	181
2016	**R0230**												**R0230**	
2017	**R0240**												**R0240**	
2018	**R0250**												**R0250**	
	Total												**R0260**	1,103

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**	
2009	**R0160**												**R0160**	
2010	**R0170**												**R0170**	
2011	**R0180**												**R0180**	
2012	**R0190**												**R0190**	
2013	**R0200**												**R0200**	
2014	**R0210**					0							**R0210**	0
2015	**R0220**		45		10								**R0220**	9
2016	**R0230**	448	138	30									**R0230**	29
2017	**R0240**	-50	249										**R0240**	247
2018	**R0250**	69											**R0250**	69
	Total												**R0260**	356

Annex I
S.23.01.01
Own funds

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation (EU) 2015/35						
Ordinary share capital (gross of own shares)	R0010	1,000	1,000			
Share premium account related to ordinary share capital	R0030					
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040					
Subordinated mutual member accounts	R0050					
Surplus funds	R0070					
Preference shares	R0090					
Share premium account related to preference shares	R0110					
Reconciliation reserve	R0130	10,501	10,501			
Subordinated liabilities	R0140					
An amount equal to the value of net deferred tax assets	R0160	10				10
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	11,511	11,501			10
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	11,511	11,501			10
Total available own funds to meet the MCR	R0510	11,501	11,501			
Total eligible own funds to meet the SCR	R0540	11,511	11,501			10
Total eligible own funds to meet the MCR	R0550	11,501	11,501			
SCR	R0580	2,604				
MCR	R0600	1,200				
Ratio of Eligible own funds to SCR	R0620	442.03%				
Ratio of Eligible own funds to MCR	R0640	958.45%				

		C0060
Reconciliation reserve		
Excess of assets over liabilities	R0700	11,511
Own shares (held directly and indirectly)	R0710	
Foreseeable dividends, distributions and charges	R0720	
Other basic own fund items	R0730	1,010
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	
Reconciliation reserve	R0760	10,501
Expected profits		
Expected profits included in future premiums (EPIFP) - Life business	R0770	
Expected profits included in future premiums (EPIFP) - Non- life business	R0780	
Total Expected profits included in future premiums (EPIFP)	R0790	

Annex I
S.25.01.21
Solvency Capital Requirement - for undertakings on Standard Formula

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0120
Market risk	R0010	2,321		
Counterparty default risk	R0020	502		
Life underwriting risk	R0030			
Health underwriting risk	R0040			
Non-life underwriting risk	R0050	152		
Diversification	R0060	-426		
Intangible asset risk	R0070			
Basic Solvency Capital Requirement	R0100	2,550		

Calculation of Solvency Capital Requirement		C0100
Operational risk	R0130	55
Loss-absorbing capacity of technical provisions	R0140	
Loss-absorbing capacity of deferred taxes	R0150	
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	
Solvency capital requirement excluding capital add-on	R0200	2,604
Capital add-on already set	R0210	
Solvency capital requirement	R0220	2,604
Other information on SCR		
Capital requirement for duration-based equity risk sub-module	R0400	
Total amount of Notional Solvency Capital Requirement for remaining part	R0410	
Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420	
Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios	R0430	
Diversification effects due to RFF nSCR aggregation for article 304	R0440	

Annex I
S.28.01.01
Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity

Linear formula component for non-life insurance and reinsurance obligations

		C0010
MCR_{NL} Result	R0010	329

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
		C0020	C0030
Medical expense insurance and proportional reinsurance	R0020		
Income protection insurance and proportional reinsurance	R0030		
Workers' compensation insurance and proportional reinsurance	R0040		
Motor vehicle liability insurance and proportional reinsurance	R0050		
Other motor insurance and proportional reinsurance	R0060		
Marine, aviation and transport insurance and proportional reinsurance	R0070		
Fire and other damage to property insurance and proportional reinsurance	R0080		
General liability insurance and proportional reinsurance	R0090	42	227
Credit and suretyship insurance and proportional reinsurance	R0100	46	203
Legal expenses insurance and proportional reinsurance	R0110		
Assistance and proportional reinsurance	R0120		
Miscellaneous financial loss insurance and proportional reinsurance	R0130	32	173
Non-proportional health reinsurance	R0140		
Non-proportional casualty reinsurance	R0150	38	171
Non-proportional marine, aviation and transport reinsurance	R0160		
Non-proportional property reinsurance	R0170	197	1,045

Linear formula component for life insurance and reinsurance obligations

		C0040
MCR_{L} Result	R0200	

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

Overall MCR calculation

		C0070
Linear MCR	R0300	329
SCR	R0310	2,604
MCR cap	R0320	1,172
MCR floor	R0330	651
Combined MCR	R0340	651
Absolute floor of the MCR	R0350	1,200
		C0070
Minimum Capital Requirement	R0400	1,200