



2019

Solvency and Financial Condition Report

 **Atradius Re**

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Summary

The Company

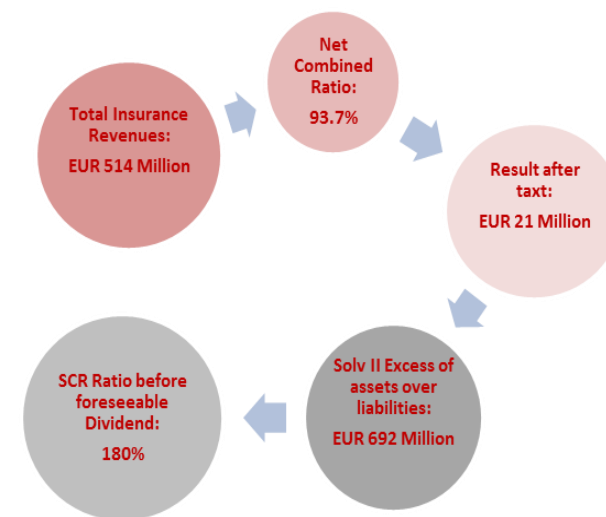
Atradius Reinsurance DAC (hereinafter referred to as Atradius Re, or 'the Company'), with its offices at 2nd Floor, La Touche House, International Financial Services Centre, Dublin 1, Republic of Ireland, D01 R5P3, is a leading market reinsurer providing capacity to primary insurance companies in credit and bonding insurance. The Company currently assumes business from 69 countries, on all continents, maintaining a balanced diversity within the portfolio. The underlying third party business consists of approximately 61% credit insurance and 39% bonding, based on premium volume. The business is underwritten by a multilingual, highly trained and experienced, international team of underwriters at the Company's offices in Dublin.

Atradius Re calculates its capital requirements under Solvency II in respect of underwriting risk, in accordance with its own regulatory approved proprietary model, which more closely reflects its

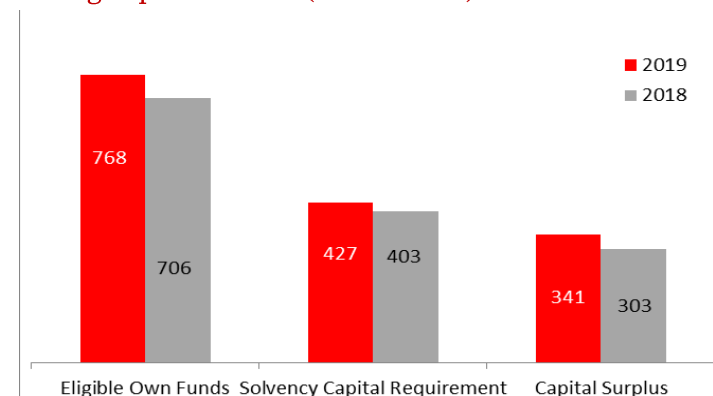
business and risk profile than does the standard formula (SF). Regulatory approval for the Company's partial internal model (PIM) was received in 2017 in accordance with Article 231 of Directive 2009/138/EC.

Atradius Re is a subsidiary of Atradius Investments Limited, also based in Dublin, which is a subsidiary of Atradius N.V., a company incorporated in the Netherlands. Atradius N.V.'s ultimate parent is Grupo Catalana Occidente, S.A, a company incorporated and listed in Spain.

Key Figures 2019



Strong Capital Position (EUR million)



Regulations

For the preparation of the Solvency II reporting as at 31 December 2019, the Company has applied the following rules:

- Solvency II laws and regulations (Directive 2009/138/EC, Delegated Acts (EU) 2015/35, Delegated Acts (EU) 2019/981);
- Statutory Instrument No. 485 of 2015 “European Union (Insurance and Reinsurance) Regulations 2015”;

- The Implementing Technical Standards and EIOPA Guidelines such as Guideline BoS 15/113 "Recognition and valuation of assets and liabilities other than technical provisions";
- Guidelines on reporting and public disclosure EIOPA – BoS-15/109
- The guidelines issued in the form of policy notices, Solvency II Information Notes and Q&A's by EIOPA and the Central Bank of Ireland (CBI).

Solvency Position

The following table summarises the Solvency II position of Atradius Reas at 31 December 2019:

Solvency position (EUR millions)	2019	2018
Own funds Solvency II	768	706
Foreseeable dividends	-	-
Eligible own funds Solvency II	768	706
Solvency capital requirement (SCR)	427	403
Minimum capital requirement (MCR)	107	106
SCR Coverage	180%	175%

Solvency II requires that the own funds are classified into three tiers, based on whether they are basic or ancillary own fund items and to the extent to which they possess the following characteristics:

- a) Loss absorbency capacity;
- b) Subordination;
- c) Sufficient duration;
- d) Freedom from requirements and incentives to redeem;
- e) Freedom from mandatory costs;
- f) Absence of encumbrances.

The following table illustrates Own Funds by tier for the Company as at 31 December 2019:

	Tier 1	Tier 2	Tier 3	Total
Basic Own Fund Items (EUR millions)				
Ordinary paid up share capital	0.6	-	-	0.6
Capital contributions	279.1	-	-	279.1
Other reserves from accounting balance sheet	395.0	-	-	395.0
Adjustments to assets	(253.5)	-	-	(253.5)
Adjustments to technical provisions	310.3	-	-	310.3
Adjustments to other liabilities	(39.9)	-	-	(39.9)
Subordinated liabilities dated	-	76.4	-	76.4
Total basic own funds	691.6	76.4	0.0	768.0

A. Business and Performance

A-1 Business

A-1 a) Name and legal form of the Undertaking

A-1 b) Supervisory authority & group supervisor

A-1 c) External auditor

A-1 d) Holders of qualifying holdings in the undertaking

A-1 e) Where the undertaking belongs to a group, details of the undertaking's position within the legal structure of the group

A-1 f) Material lines of business and material geographical areas of business

A-1 g) Any significant business or other events that have occurred over the reporting period that have had a material impact on the undertaking

A-2 Underwriting performance

A-3 Investment performance

A-4 Performance of other activities

A-5 Any other information

A-1 Business

A-1 a) Name and legal form of the undertaking

Atradius Reinsurance DAC (Designated Activity Company),
2nd Floor, La Touche House,
International Financial Services Centre,
Dublin 1,
D01 R5P3,
Ireland.

A-1 b) Supervisory authority & group supervisor

The Central Bank of Ireland,
New Wapping Street,
North Wall Quay,
Dublin 1,
D01 F7X3,
Ireland.

The Company is authorised pursuant to the European Union (Insurance and Reinsurance) Regulations 2015 to carry on the business on Non-Life reinsurance in Ireland and in other jurisdictions, subject to complying with any requirements in those other jurisdictions.

The supervisor of the Group to which the Company belongs, Grupo Catalana Occidente S.A., is Dirección General de Seguros y Fondos de Pensiones, with an address at Paseo de la Castellana, 44 CP 28046, Madrid, Spain.

A-1 c) External auditor

External auditing services are performed by PricewaterhouseCoopers with an address at One Spencer Dock, North Wall Quay, Dublin 1, Ireland.

A-1 d) Holders of qualifying holdings in the undertaking

Atradius Investments Limited, a company incorporated in Ireland, is the Company's holding and parent company.

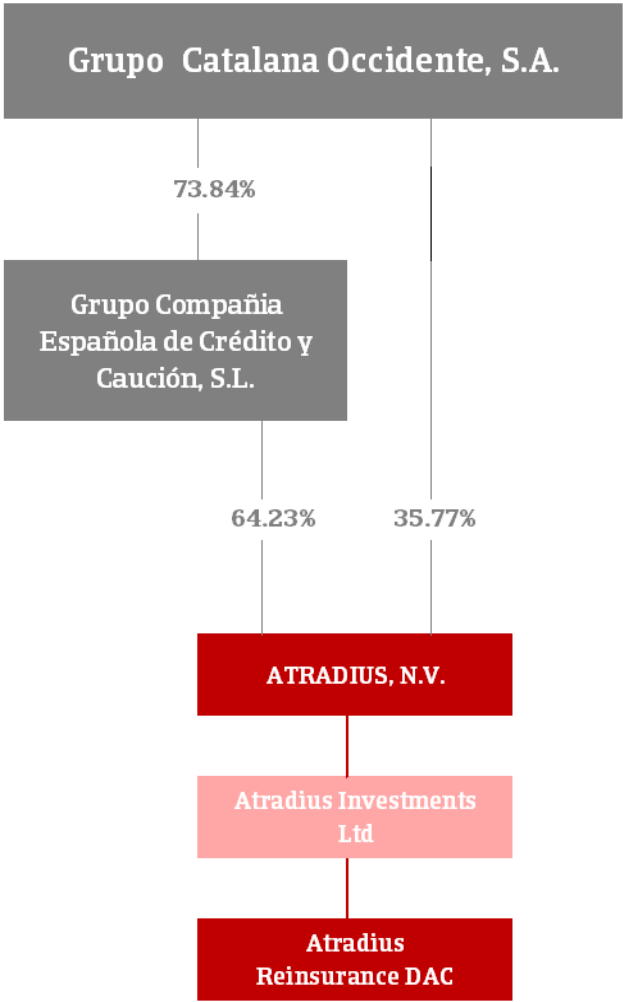
Atradius Investments Limited is a subsidiary of Atradius N.V., a company incorporated in the Netherlands.

A-1 e) Where the undertaking belongs to a group, details of the undertaking's position within the legal structure of the group

Atradius Reinsurance DAC is the 100% owned subsidiary of its parent company, Atradius Investments Limited, which is itself a 100% owned subsidiary of Atradius N.V., a company incorporated in the Netherlands.

Atradius N.V., with its office at David Ricardostraat 1, 1066 JS, Amsterdam, the Netherlands, and its subsidiaries (together referred to as 'Atradius') is a global credit insurer which aims to support its customers' growth by strengthening their credit and cash management through a wide range of credit insurance management products and services. These services include credit insurance, bonding, reinsurance, information services, collection services and instalment credit protection. Atradius offers products and services from strategically located offices on six continents and employed just under 3,700 people as at 31 December 2019 (2018: 3,700).

Shareholder Structure



Grupo Catalana Occidente

The ultimate parent of Atradius N.V. is Grupo Catalana Occidente, S.A. (GCO), with an economic stake of 83.2% (35.77% directly and 47.43% indirectly through the holding company Grupo Compañía Española de Crédito y Caución, S.L.).

The shares of GCO are listed on the Continuous Market of the Barcelona and Madrid stock exchanges. As of 31 December 2019, the

main shareholder is INOC, S.A, controlling 61.4% of the capital of Grupo Catalana Occidente. 33.6% of the capital is floating, 1.75% of its shares are treasury stock and 3.25% of its shares are owned by members of the board of directors of Grupo Catalana Occidente (not considered floating).

Thanks to the stability of its results and a prudent investment policy, GCO has a solid solvency position as can be seen from the below:

Key Figures (EUR million)	2019	2018	% change 2019/2018
Long-term capital market value	4,574.1	3,908.6	17.0%
Equity	3,851.2	3,204.1	20.2%
Subordinated debt	200.5	200.4	0.2%
Return on long-term capital	11.1%	12.3%	
Funds under management	14,377.3	12,323.5	16.7%
Total revenue	4,547.7	4,345.2	4.7%
Consolidated result	424.5	386.4	9.9%

GCO is one of the leaders in the Spanish insurance sector and in global credit insurance. Founded more than 150 years ago, it has experienced constant growth, thanks to its capacity to adapt to change and remain loyal to its principles, which are truly insurance oriented.

GCO is committed to the professional development of its employees and insurance agents, its personalised customer service and the trust its shareholders have in the organisation.

Strategic goal

To be leaders in the field of risk protection and long-term savings of families and SMEs, and to be international leaders in commercial risk coverage.

Thanks to the stability of the results and the prudent investment policy, GCO has a solid solvency position.



Insurance specialist

- Over 150 years of experience.
- Complete offer.
- Sustainable and socially responsible model.



Solid financial structure

- Listed on the stock exchange.
- "A" Rating.
- Stable, committed shareholders.



Closeness – global presence

- Approximately 18,000 intermediaries.
- Over 7,400 employees.
- 1,600 offices.
- 50 countries.



Technical rigour

- Excellent non-life combined ratio
- Strict cost control
- Diversified and prudent investment portfolio.



Fundación Jesús Serra

Fundación Jesús Serra was established in 2006 with the goal of channelling philanthropic action and promoting the human and professional values that characterized the founder of Grupo Catalana Occidente, Jesús Serra Santamans, from whom it receives its name. It is currently involved in projects in the fields of research, business, education, social action, sport, and promotion of the arts. In this way, we aim to contribute to the construction of a fairer, more united, and developed society in which values such as initiative, effort, and continuous improvement prevail.

The Foundation acts as a link between the different companies that make up Grupo Catalana Occidente. For this reason, one of its goals is to support the development of a common culture, by facilitating gatherings and participation from the employees and brokers who form the company through the organization of different programs and activities.



Multi-risk

Family-home, stores, communities, offices and SMEs.



Other

Industrial Products, engineering, accidents and civil liability.



Life

Life risk, life savings, pension plans and investment funds as well as funeral and health.



Motor

Coverage for vehicles or transport fleets

The brands of the Group in the traditional business are:



Credit insurance

Protects against financial losses due to the inability of a buyer to pay for goods purchased on credit.



Surety insurance

Protects the beneficiary if a supplier does not comply with its contractual obligations.



Reinsurance

Wide range of reinsurance options for insurance companies of the main insurers in the world.



Global

Solutions adapted in a Global manner for multinational companies.

The brands of the Group for credit insurance business are:



A-1 f) Material lines of business and material geographical areas of business

LINES OF BUSINESS - Credit and Bonding Reinsurance

The Company is the leading specialised credit and bonding reinsurer in the market, providing reinsurance solutions for the credit insurance and bonding business of primary insurers throughout the world, through a dedicated team of multilingual, highly trained and experienced international underwriters.

The Company currently assumes business from 69 countries, on all continents, maintaining a balanced diversity within the portfolio. The underlying third party business consists of approximately 61% credit insurance and 39% bonding, based on premium volume.

The Company has created long-standing relationships with its clients and specialist brokers. The quality of these client and broker relationships is underscored by the

Company's unique offering: combining the Atradius Group's skills in the primary underwriting of credit insurance and bonding risks with its own distinctive approach and expertise in structuring reinsurance solutions. In this way, the Company can anticipate and respond to its clients' specific and changing needs. It continues to evolve and succeed in the face of increasing competition and is one of only very few reinsurers to have the capacity to re-underwrite. Those services create a very distinctive added value to its clients. Moreover, because it can cross-promote and thus provide an evolving portfolio of additional expert services, the Company is widely acknowledged to play an important role in the international development and growth of the credit and bonding insurance industry, particularly in emerging markets. The Company is an active member of and contributor to ICISA, PASA, DIMA and the Aman Union.

GEOGRAPHICAL AREAS OF BUSINESS

The Company is authorised and regulated by the Central Bank of Ireland and is authorised to conduct reinsurance business in the EU internal market in accordance with the provisions of the

European Union (Insurance and Reinsurance) regulations, 2015. It is authorised to carry on the business of non-life reinsurance in Ireland and in other jurisdictions, subject to complying with any requirements in those other jurisdictions. It is licensed and/or registered individually in a number of foreign jurisdictions including Argentina, Bolivia, Brazil, Chile, China, Colombia, Ecuador, Guatemala, India, Mexico, Paraguay, the Republic of Panama, and Venezuela.

The full list of geographical areas from which the Company assumes business is as follows:

Europe:

Austria, Belgium, Croatia, Cyprus, Czech Republic, Estonia, France, Georgia, Greece, Hungary, Ireland, Italy, Kosovo, Latvia, Lithuania, Macedonia, Malta, The Netherlands, Poland, Portugal, Romania, Russia, Serbia, Slovakia, Slovenia, Spain, Turkey, The United Kingdom.

Middle East:

Bahrain, Israel, Jordan, Lebanon, Oman, Saudi Arabia, United Arab Emirates.

Americas:

Argentina, Bolivia, Brazil, Chile, Colombia, Ecuador, Guatemala, Jamaica, Mexico, Paraguay, Peru, United States, Uruguay.

Asia:

Bangladesh, Cambodia, China, India, Indonesia, Japan, Malaysia, Pakistan, Philippines, Singapore, South Korea, Thailand.

Africa:

Algeria, Egypt, Kenya, Mauritius, Morocco, South Africa, Tunisia.

Oceania:

Australia, New Zealand.

A-1 g) Any significant business or other events that have occurred over the reporting period that have had a material impact on the undertaking

Atradius N.V.'s Insurance Financial Strength Rating was affirmed at 'A2' (outlook stable) by Moody's in November 2019.

In November 2019, A.M. Best affirmed the Financial Strength Rating of A (excellent), outlook stable of parent Company Atradius N.V. and affirmed the Long-Term Issuer of Credit Ratings (Long-Term ICRs) of the Atradius rated entities at "a+" with a stable outlook.

A-2 Underwriting performance

Stable and profitable growth

The following financial numbers are stated in accordance with the basis of preparation of the financial statements, which is FRS 102 “The Financial Reporting Standard applicable in the UK and the Republic of Ireland” and FRS 103 “Insurance Contracts” (“UK and Irish GAAP”) issued by the UK Financial Reporting Council, and promulgated for use in Ireland by Chartered Accountants Ireland. The financial numbers presented are therefore in accordance with UK and Irish GAAP and are as per the financial statements.

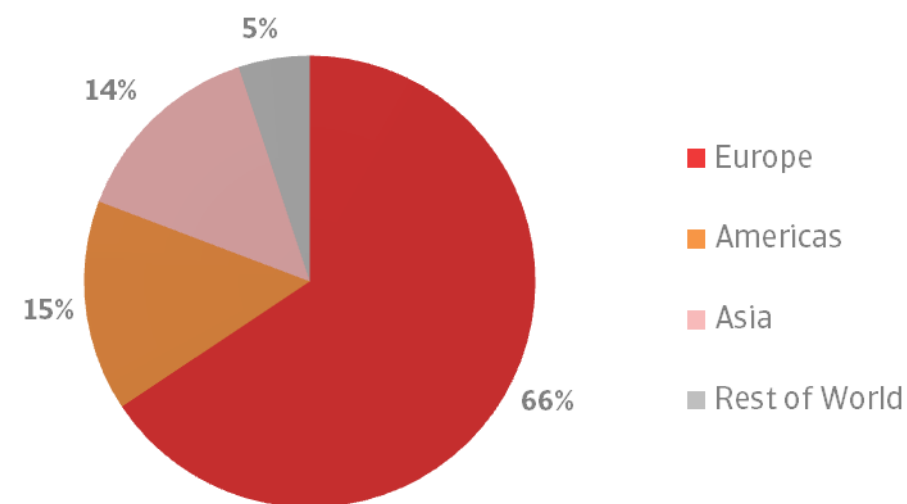
(EUR thousands)	2019	2018
Gross Insurance revenue	514,229	486,872
Gross insurance claims and loss adjustment expenses	(240,818)	(233,390)
Gross insurance operating expenses	(238,770)	(216,576)
Reinsurance result	(10,765)	(17,926)
Technical result	23,876	18,980
Net Investment income	2,852	5,424
Operating result before finance costs	26,728	24,404
Finance costs	(2,356)	(2,048)
Profit before tax	24,372	22,356
Tax on profits	(3,039)	(2,805)
Profit after tax	21,333	19,551
Employees (FTE)	28	28

	GROSS		NET	
	2019	2018	2019	2018
Claims Ratio	47.0%	48.0%	47%	49%
Expense Ratio	45.0%	44.0%	48%	47%
Combined Ratio	92.0%	92.0%	95%	96%

The following table provides a breakdown of the Company's **Gross Earned Premium** by region:

	2019		2018	
	€'000	%	€'000	%
Europe	337,610	66%	319,417	66%
Americas	77,701	15%	67,079	14%
Asia	72,692	14%	68,866	14%
Oceania	9,538	2%	12,884	3%
Middle East	8,803	2%	10,672	2%
Africa	7,885	1%	7,954	1%
Total	514,229	100%	486,872	100%

Geographical Area information:



During 2019, the Company's total revenue increased from EUR 486.9 million to EUR 514.2 million. The gross claims ratio has reduced from 48% to 47%, while the gross commissions and direct operating expenses ratio increased from 44% to 45%. The gross combined ratio has remained constant at 92%.

Reinsurance revenue from the Atradius Group grew by 5.0% (2018: 2.0%). This growth is a result of increasing levels of new business and of maintaining an excellent customer retention level of 94.3%. The gross claims ratio relating to group internal business reduced from 45% to 44%.

Third party reinsurance revenue for 2019, of EUR 140.2 million, has increased from EUR 131.4 million in 2018. This increase is due to both new business and increased shares on existing business. The Company continues to maintain a conservative, forward looking underwriting approach, with an emphasis on increasing profitability thresholds over the cycle. The success of this approach is reflected in a further reduction in claims costs, during 2019.

The Company's prudent investment strategy continues to be challenged, in a difficult environment with low or negative interest rates and volatile equity markets. The Company's investment strategy remains on course with a focus on preserving capital to avoid large losses on the investment portfolio.

No dividend is expected to be paid during 2020 to the Company's immediate parent company, Atradius Investments Limited (2018: nil).

The Company's key objective and long term strategy includes secured net profits, sustainable growth and a strong capital position.

The Company transfers a portion of its reinsurance risk to external reinsurers/retrocessionaires, through a number of reinsurance arrangements, including quota share and excess of loss treaties. The reinsurance treaties are reviewed annually and in accordance with the Company's policy to select only reinsurers with a high quality

standard of solvency/rating. The normal minimum requirement is an 'A' level rating.

A-3 Investment Performance

Investment income reduced to EUR 2.8 million in 2019 (2018: EUR 5.4 million). This is due mainly to EUR 2.5 million impairment of equity holdings during 2019.

The revaluation reserve on financial investments increased by EUR 21.7 million in 2019. This is mainly due to an increase in the value of equities of EUR 19.7 million.

The Company's investment strategy has remained on course with a focus on preserving capital to avoid large losses on the investment portfolio.

Breakdown of investment income

(EUR thousands)	2019	2018
Net interest income	4,062	3,566
Dividends	2,500	2,692
Net Realised gains	68	614
Impairments	(2,482)	(344)
Investment handling expenses	(1,296)	(1,104)
Investment result	2,852	5,424

Gains and losses in the revaluation reserve

(EUR thousands)	2019	2018
Equity securities	19,715	(11,186)
Debt securities	2,024	(2,745)
Total gains and losses recognised in revaluation reserve	21,739	(13,931)

The table below shows the asset allocation by investment class:

Investments Split

(EUR thousands)	2019	2018
Government Bonds	321,123	346,583
Corporate Bonds	630,907	549,066
Equity Shares	94,908	59,945
Short Term Investments	628	56,907
Total	1,047,566	1,012,501

A-4 Performance of other activities

n/a

A-5 Any other information

Emerging Risks

The COVID-19 pandemic is expected to have several impacts on the development of the Solvency Capital Requirement of Atradius Re.

The impact on the financial markets, and subsequent volatility, is expected to affect the results of all Market Risk sub-modules due to changes in the market values of assets and liabilities of the various investment classes, but also due to the volatility of FX rates.

We anticipate an impact on Non-Life Underwriting Risk due to a change of the risk profile of the portfolio. Key drivers will be changes in the credit quality within the portfolio and resulting management of the exposure levels (dynamic exposure management).

The likely reduction in global economic activity may reduce the expected premiums Atradius Re will assume, in FY2020. However, policy underwriting mechanisms and governmental actions may mitigate this impact, ensuring a robust, but lower than originally expected, revenue line.

Increases in insolvencies could impact claims costs, however, our prudent provisioning methodology together

with our very strong cash position provide high levels of comfort to deal with this potential deterioration.

Despite all of the negative impacts expected from COVID-19, we currently expect our coverage ratio to remain not only above the minimum level of 100%, but above 150%. This is without including the potential positive impact of any Government Support Schemes in the different countries from which Atradius Re assumes business.

In section C-7 Scenario and Sensitivity Analyses, we include the potential impact on the SCR ratio for different components that could be part of this adverse scenario. As part of our Own Risk & Solvency Assessment, we stress our SCR projections over financial years 2020-2022. While these stresses do not specifically capture COVID-19 assumptions, they are severe enough and include all the different components that could be impacted due to COVID-19: Claims ratio, Reduction TPE due to mitigation actions and volatility of the financial markets. In each case, the SCR coverage ratio remains above 150%.

B. System of governance

B-1 General information on the system of governance

B-1.1 Corporate governance framework

B-1.2 Board of Directors (“BOD”)

B-1.3 Audit Committee (“AC”)

B-1.4 Risk Committee (“RC”)

B-1.5 Key functions

B-1.6 Remuneration policy

B-1.7 Corporate governance framework - Atradius N.V

B-2 Fit and proper requirements

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

B-4 Internal control system

B-5 Outsourcing

B-6 Any other information

B-1 General information on the system of governance

B-1.1 Corporate governance framework – Atradius Reinsurance DAC

Atradius Reinsurance DAC (“the Company”) endorses the importance of sound corporate governance. Key elements of independence, accountability and transparency create a relationship of trust between the Company and all of its stakeholders: employees, customers, suppliers, shareholders, regulators and the general public.

The Company is a designated activity company (DAC) organised under the laws of the Republic of Ireland. The Company is a subsidiary of Atradius Investments Limited (also based in the Republic of Ireland) which is itself a subsidiary of Atradius N.V. a company incorporated in the Netherlands.

The ultimate parent of Atradius N.V. is Grupo Catalana Occidente, S.A. (GCO), a company incorporated and listed in Spain,

with an economic stake of 83.2% (35.77% directly and 47.43% indirectly through the holding company Grupo Compañía Española de Crédito y Caución, S.L.). The Company is authorised by the Central Bank of Ireland (“CBI”) to carry on the business of Reinsurance and is subject to the minimum requirements as set out in the Corporate Governance Requirements for Insurance Undertakings (as amended from time to time).

Primary responsibility for corporate governance within the Company rests with the Board of Directors (“BOD”). The BOD supervises the general affairs of the Company, taking into account the interests of the Company and its stakeholders.

The BOD is supported in its role by:

- the establishment of two board sub-committees – Audit and Risk – which make recommendations to the BOD within the remit of their terms of reference; and
- A number of Atradius Group Committees – on which the Company has voting rights and

whose activities are reported directly into the BOD and/or its sub-committees as necessary.

The Executive Directors (“ED”) are responsible for proposing strategies, for executing agreed strategies and for achieving the Company’s objectives, policy and results. The ED are responsible for management and oversight of the general affairs of the Company and are supported in their roles by the establishment of:

- Four key functions – Compliance, Risk Management, Actuarial and Internal Audit – which report

directly to the BOD and/or its sub-committees as necessary; and

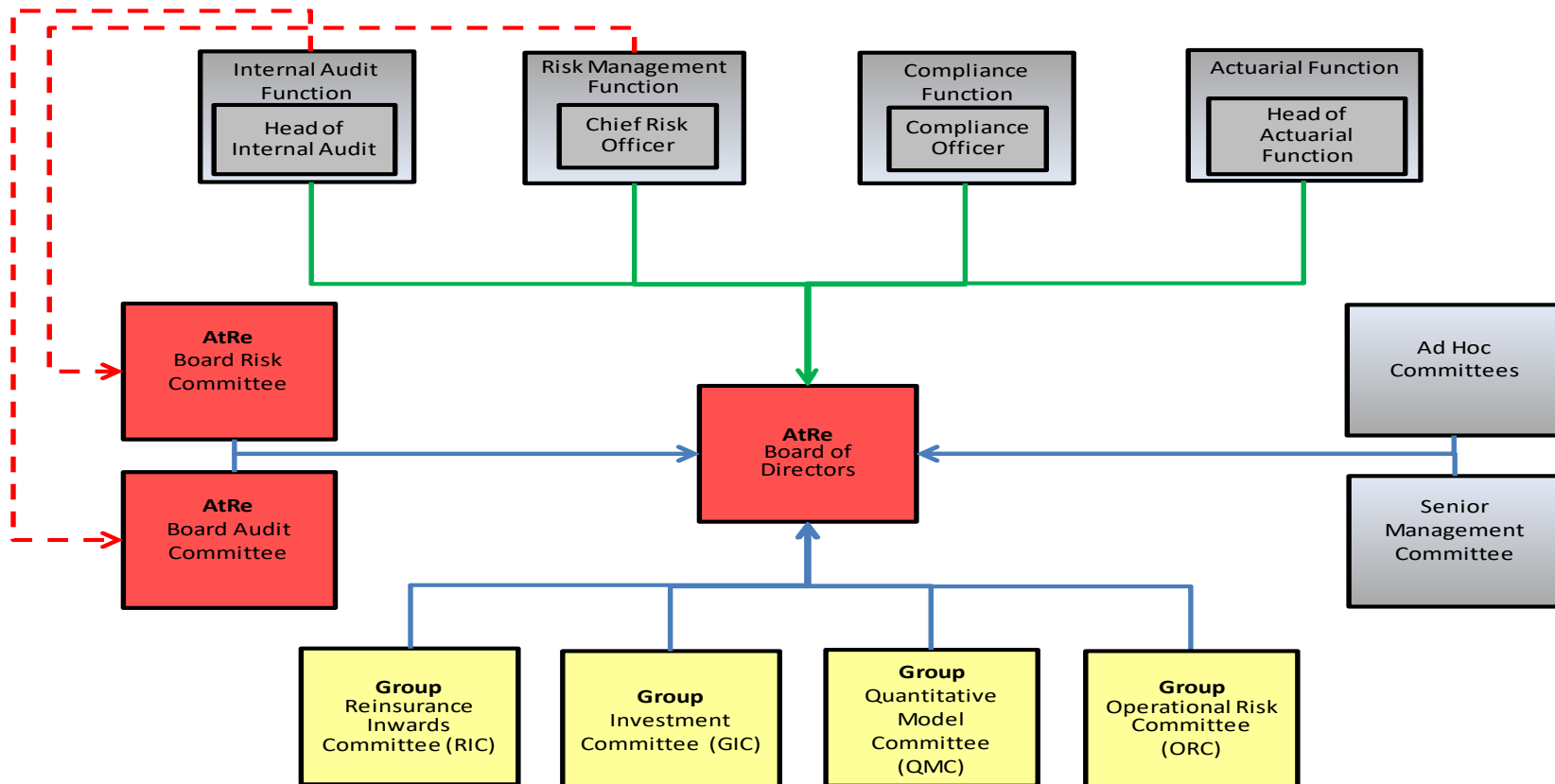
- One management committee – Senior Management which reports directly to the ED; and
- Other ad-hoc committees as deemed appropriate from time to time.

The Non-Executive Directors (“NEDs”) are responsible for challenging, agreeing and overseeing the execution of strategies and must participate fully in the decision making process.

The Board of Directors of Atradius Reinsurance DAC as at 31st December 2019 consists of seven members:

- David Capdevila – Chairman of the Board (non-executive director)
- Daniel Stausberg – Managing Director (executive director)
- Niamh Derivan – Finance Director (executive director)
- Marc Henstridge – non-executive director
- Antonio Rubio – non-executive director
- Conor Molloy – independent non-executive director
- Mary Brennan – independent non-executive director

With effect from 1st January 2020, David Capdevila resigned from the board and Mark Henstridge was appointed to the role of Chair of the board (non-executive director).



B-1.2 Board of Directors (“BOD”)

The BOD is represented by a balanced proportion of executive and non-executive directors. The majority of the BOD must be NEDs. There must be a minimum of five directors appointed to the BOD and there must be at least two independent non-executive directors appointed to the BOD at all times.

The BOD receives its powers and duties from the Company's shareholders by virtue of the Company's Articles of Association. These powers are then limited by legal and regulatory restrictions. These powers are subject to oversight by various bodies but most particularly by the Central Bank of Ireland.

The BOD meets at least four times in any calendar year. The BOD chairperson, following appropriate consultation with the ED, sets an agenda in advance of each meeting. To enable proper discussion of the items on the agenda for each meeting, the BOD is provided with all relevant information and documentation in advance of those meetings.

The BOD sets the Company strategy and oversees the implementation of this

strategy by reviewing periodic and ad-hoc reports prepared by the ED, the Compliance function, the Risk Management function, the Internal Audit function, the Actuarial function, the External Actuarial Consultants and External Audit as appropriate.

The BOD ensures the proper organisation of the Company, the implementation of a strong internal control system, the implementation of a strong enterprise risk management system and the definition and formalisation of suitable policies and procedures. The BOD provides direction concerning the running of the business in line with the Company strategy and is responsible for ensuring that these directions are executed by the Company.

All BOD members are required to attend all BOD meetings unless they are unable to attend due to circumstances beyond their control. The minimum quorum for decision making requires that there is a balanced representation of NEDs to EDs, ensuring a majority of non-executive directors is maintained with at least one INED present at all meetings. Decisions will be made on

a simple majority basis. The Chair of the BOD retains the casting vote. The Secretary will formally record all minutes and decisions taken.

In accordance with the Articles of Association, the BOD formulates the Company's operational and financial objectives and the Company strategy designed to achieve these objectives. The annual budget and long term plan of the Company is prepared by the ED and is submitted to the BOD and Group stakeholders for their review and approval.

Board diversity policy

The BOD must satisfy itself as to the suitability of all BOD appointees. It is the policy of the BOD to consider all BOD appointments on merit. Candidates will be considered against objective criteria, having due regard for the benefits of diversity on the Board, including professional background, geographical location and gender. All appointments to the BOD must be documented in accordance with the ongoing requirements of the Corporate Governance

Requirements and Fitness & Probity standards.

Conflict of Interest Policy

A member of the BOD with a conflict of interest with the Company will immediately report this to the Chair of the BOD. A member of the BOD who has a conflict of interest with the Company will not participate in discussions and/or decision-making processes on any issues or transactions affected by the conflict of interest. A register of any and all conflicts of interest reported is maintained as part of the Company's records. Upon appointment to the BOD, all members are required to sign a Conflict of Interest and Fitness & Probity statement acknowledging their obligations under the CBI Corporate Governance Requirements and Fitness & Probity Standards.

B-1.3 Audit Committee ("AC")

The BOD must satisfy itself as to the suitability of all AC appointees. The AC supports the BOD in fulfilling its supervisory and monitoring duties with respect to the assurance of the integrity of the Company's financial statements, the external auditor's qualifications, and the performance of internal and external

auditors. The AC monitors, independently and objectively, the financial reporting process within the Company and the system of internal controls. The AC also supports the ongoing communication between the External Auditor, the Internal Audit function and the BOD on issues concerning the Company's financial position and financial affairs.

Internal Audit function - Internal Audit fulfils an important role in assessing and testing the internal risk management and control system. The Director of Atradius Group Internal Audit reports to the Chair of the AC.

Composition of the Audit Committee

The AC shall consist of at least three members.

All members must have relevant expertise in financial administration and accounting for listed companies or other large companies and at least one member shall have an appropriate qualification.

All members must be non-executive directors, the majority of directors being independent.

The AC Chair shall be an independent non-executive director.

At least one member of the AC must also be a member of the Risk Committee (RC). Neither the Chair of the BOD, nor the Managing Director, shall be a member of the Audit Committee.

The BOD shall appoint one of the AC members as AC Chair. The AC Chair shall be primarily responsible for the proper functioning of the AC. He/She shall act as the spokesperson of the AC and shall be the main contact for the BOD. In particular, he/she will take care of good communication with the BOD and consultants appointed by the AC. The AC Chair will maintain regular contact with the chair of the BOD.

B-1.4 Risk Committee ("RC")

The BOD must satisfy itself as to the suitability of all RC appointees. Enterprise risk management is a priority for the Company (at an entity level and as part of the Group) and helps steer its financial, operating and other risks. The RC supports the BOD in fulfilling its supervisory and monitoring duties with respect to the risk strategy of the Company. The RC is

supported by the Atradius Re Chief Risk Officer (CRO) who reports into the RC on a regular basis.

The RC forms part of the Company's Approved Corporate Governance Framework and is responsible for overseeing and advising the Board in relation to the current risk exposures and future risk strategies of the Company.

The RC and its individual members must operate in the context of, and must remain compliant with, the Corporate Governance Requirements for Insurance Undertakings.

Unless otherwise defined hereinafter, the terms used in this Risk Committee governance shall have the meaning as defined in the Governance Framework.

Composition of the Risk Committee

The RC shall consist of all current members of the BOD. A quorum will exist if three members are in attendance provided there is a majority of NEDs in attendance (one of which must also be a member of the AC).

All members must have relevant expertise in the management of risks.

Voting rights apply to each member of the Committee with the chairperson of the meeting having a casting vote to reach a majority decision.

The proportionality of appropriate representation between executive and non-executive directors must be maintained.

The Chair of the Committee shall be a NED.

The Chair may invite other employees or advisors to attend all or part of any RC meeting.

The BOD shall appoint one of the RC members as RC Chair. The RC Chair shall be primarily responsible for the proper functioning of the RC. RC Chair shall act as the spokesperson of the RC and shall be the main contact for the BOD. In particular, the RC Chair will take care of good communication with the BOD and consultants appointed by the RC. The RC Chair will maintain regular contact with the chairman of the BOD.

B-1.5 Key functions

Four key functions have been established at the Company, all of which support the

BOD in discharging its obligations. Article 13 of the Solvency II Directive defines a function, within a system of governance, as "an internal capacity to undertake practical tasks". These four key functions are **Compliance, Risk Management, Actuarial and Internal Audit**.

Compliance function

The Company's Compliance function is an independent function and as such will not be placed in a position where possible conflicts of interest may occur between Compliance responsibilities and any other responsibilities. It consists of a Head of Compliance who must be formally appointed to the role by the BOD. The role of the Head of Compliance is a Pre-Approved Control Function (PCF) under the applicable CBI regulations and any appointment to this role must be pre-approved by the CBI. The Compliance function supports the BOD in meeting its objective of complying with all applicable laws and regulations.

The Head of Compliance responsibilities include, among other things:

- ensuring the regulatory and operational compliance obligations

of the organisation are duly implemented, monitored and reported in a timely manner;

- ensuring that all legal and company secretarial administration is monitored and controlled with timely record keeping and reporting;
- monitoring changes in applicable law or regulations and for assessing the impact thereof as well as assessing that internal processes are compliant;
- working on a preventive basis, by providing assistance and advice on all compliance matters;
- reporting directly to the BOD;
- acting as liaison between the Company and its regulators, responsible for coordinating and maintaining a strong and transparent relationship with its regulators;
- Independence is enhanced by the provision of an independent dotted reporting line to the Head of Compliance of Atradius N.V. This reporting line is specifically aimed

at allowing adverse reporting to take place if such reports become necessary.

Risk Management function

The Company's Risk Management ("RM") function is independent and as such will not be placed in a position where possible conflicts of interest may occur between Risk Management responsibilities and any other responsibilities. It consists of a Chief Risk Officer who must be formally appointed to the role by the BOD. The role of the CRO is a PCF under the applicable CBI regulations and any appointment to this role must be pre-approved by the CBI. The Risk Management function supports the BOD in meeting its objective of effectively managing its risk profile relative to its risk appetite and draws support from the Atradius Group Risk Management Function as necessary.

Risk function - The risk function is responsible for reviewing and assessing the performance of the risk management function of the Company and for making recommendations as appropriate.

The CRO's responsibilities include, among other things:

- distinct responsibility for the RM function and for maintaining, and monitoring the effectiveness of, the risk management system;
- ensuring that effective processes are in place to identify, measure, manage, monitor and report on the risks to which the Company is, or might be, exposed to;
- responsibility for facilitating setting of the risk appetite by the BOD;
- reporting directly to the BOD via the Risk Committee;
- reporting directly to the BOD on outcomes arising from the internal model governance committees (ie. QMC), as appropriate. Furthermore, the CRO ensures communication of feedback that the BOD has on the internal model, such as use of expert judgements, model changes and validation results;

- The CRO has a designated functional reporting line into Atradius Group Risk Management to ensure that the Risk Management function is aligned with, and embedded within, the Atradius Group.

Actuarial function

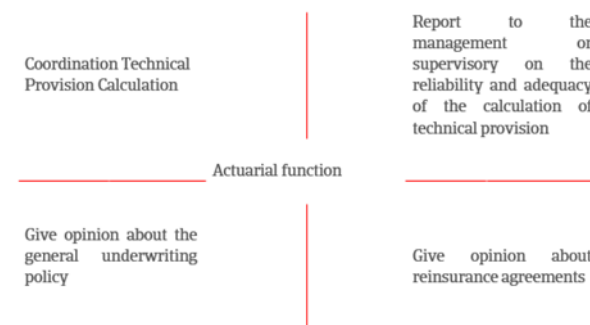
The Actuarial function is outsourced to Grupo Catalana Occidente S.A. via an intra-group outsourcing agreement. The Company Actuarial function consists of a Head of Actuarial Function (HoAF), who is formally appointed to the role by the BOD and who is supported in his role by Actuarial department within the Company. The role of the HoAF is a pre-approved control function under the applicable CBI regulations and any appointment to this role must be pre-approved by the CBI.

Deliveries of the Actuarial Function will comply with all relevant regulations and guidelines both at a European level and at the domestic (Irish) level.

The responsibilities of the Head of Actuarial Function include, among other things, the following:

- Co-ordination of the technical provision calculation;
- Ensure the appropriateness of the methodologies and underlying models used as well as the assumptions made in the calculation of technical provisions;
- Assess the sufficiency and quality of the data used in the calculation of technical provisions;
- Compare best estimates against experience;
- Inform the administrative, management or supervisory body of the reliability and adequacy of the calculation of technical provisions;
- Oversee the calculation of technical provisions in the cases set out in Article 82 of the Directive;
- Express an opinion on the overall underwriting policy;

- Express an opinion on the adequacy of reinsurance arrangements; and
- contribute to the effective implementation of the risk-management system referred to in Article 44 of the Directive, in particular with respect to the risk modelling underlying the calculation of the capital requirements set out in Chapter VI, Sections 4 and 5, and to the assessment referred to in Article 45 of the Directive.



Internal audit function

The Internal Audit (IA) function has been outsourced to Atradius CyC. The IA function is an independent function and all

audit work undertaken is carried out freely, objectively and independent of the activity being audited/reviewed.

The IA function has developed an Internal Audit charter, approved by the Audit Committee (AC), which outlines the authority, responsibility and governance over Internal Audit. The IA function is responsible for advising the BOD, through its AC on the Company's system of internal control and provides regular reporting to the BOD via the AC.

The IA function has independent access to the Chair of the AC.

B-1.6 Remuneration Policy

The Atradius Group remuneration policy lays down the principles and key elements of sound and controlled remuneration of all Atradius' employees, including those of Atradius Re. The Remuneration Policy supports the Group's business strategy, objectives, values and long-term interest and is aligned with the size, organisational set-up, nature and complexity of the business activities of the Group. The Remuneration Policy is designed to improve the performance and the value of the Group, to motivate, retain and attract

qualified employees and to contribute to sound and efficient risk management within the Group and to discourage taking more risk taking than is acceptable to Atradius.

The design principles underlying the remuneration policy applicable to Atradius staff shall be based on the following:

- Remuneration shall contribute to sound and efficient risk management, shall not encourage taking more risk than acceptable to Atradius or restrict the company's ability to maintain an adequate capital base;
- Remuneration shall comprise measures that should avoid conflicts of interest;
- Fixed and variable remuneration shall be used to align individual performance with both short and long-term corporate strategy and objectives;
- Remuneration shall reward according to performance at group, entity and individual level as appropriate. In so far as required by SII regulations Individual objectives shall include a combination of financial and non-

financial targets as appropriate to the role, taking into account ethical behaviour and corporate responsibility;

- Remuneration shall be set at levels appropriate to local market conditions to attract and retain talented employees, while observing these design principles and applicable laws, rules and regulations;
- Performance criteria for employees will be objective, measurable and linked to individual, department and group performance as appropriate.
- Non-financial rewards (other benefits) may also be used to further improve motivation and nurture employee commitment.
- Remuneration shall be practical and easy to understand and shall be supported by clear and timely communication;
- Remuneration shall be designed to encourage behaviour that promotes Atradius' values.

Typical elements of total compensation for employees of Atradius are annual base

salary, annual variable remuneration and other benefits. Stock options or share purchasing programs are not applicable in Atradius. Supplementary pension schemes do exist in the form of a Defined Contribution scheme.

There have been no material transactions with shareholders, nor with persons who exercise a significant influence on the undertaking.

B-1.7 Corporate governance framework – Atradius NV

Atradius endorses the importance of sound corporate governance. Key elements of independence, accountability and transparency create a relationship of trust between Atradius and all of its stakeholders.

Atradius N.V. is a limited liability company organised under the laws of the Netherlands with a Management Board and a Supervisory Board. The Management Board is responsible for achieving Atradius N.V.'s objectives, strategy, policy and results and is guided by its interests and the business connected with it. The Supervisory Board supervises Atradius N.V.'s general affairs and the policy

pursued by the Management Board as well as the performance of the management duties by the Management Board members, taking into account the interests of Atradius and the business connected with it.

The Management Board as a whole is responsible for the management and the general affairs of Atradius and is supervised by the Supervisory Board. The Management Board determines Atradius' operational and financial objectives, and the strategy designed to achieve these objectives, and ensures that Atradius has in place an effective risk management system, internal control system and internal audit function. The annual business plan and budget of Atradius are submitted to the Supervisory Board for approval. The Management Board rules describe the (allocation of) duties and the decision making process of the Management Board.

The General Meeting has the authority to appoint the members of the Management Board on the recommendation of the Remuneration, Selection and Appointment Committee of the Supervisory Board. A Management Board member may be suspended or dismissed by the General

Meeting at any time. The Management Board shall consist of at least three members. Management Board members are appointed for an undefined term. In the event of a vacancy, the management of Atradius N.V. will be conducted by the remaining members or sole remaining member of the Management Board.

The Management Board of Atradius N.V. currently consists of five members:

- David Capdevila - Chairman and Chief Executive Officer (started 1st January 2020)
- Isidoro Unda - Chairman and Chief Executive Officer (until 31st December 2019)
- Andreas Tesch - Chief Market Officer
- Christian van Lint - Chief Risk Officer
- Claus Gramlich-Eicher - Chief Financial Officer
- Marc Henstridge - Chief Insurance Operations Officer

CVs of each of the Management Board members, showing their roles, background and experience are available on the website.

The Supervisory Board supervises the Company's general affairs and the policy pursued by the Management Board. The responsibilities of the Supervisory Board include, among others, supervising, monitoring and advising the Management Board on the Company's strategy, performance and risks inherent to its business activities; the design and effectiveness of the internal risk management and control systems and the financial reporting process. The Supervisory Board rules describe the decision-making process and the composition and committees of the Supervisory Board.

The General Meeting has the authority to appoint the members of the Supervisory Board on the recommendation of the Remuneration, Selection and Appointment Committee of the Supervisory Board. A Supervisory Board member may be suspended or dismissed by the General Meeting at any time. The Supervisory Board shall consist of at least five members. Supervisory Board members shall resign according to a rotation scheme determined by the Supervisory Board pursuant to which each Supervisory Board member shall resign after a maximum period of four years, after the date of

appointment. A resigning Supervisory Board member may be reappointed. A Supervisory Board member will resign early in the event of inadequate performance or in other circumstances in which resignation is deemed necessary by the other members of the Supervisory Board.

The Supervisory Board of Atradius N.V. currently consists of nine members:

- Ignacio Álvarez, Chairman
- Francisco Arregui, Vice-Chairman
- Bernd Meyer
- Xavier Freixes
- Hugo Serra
- Désirée van Gorp
- John Hourican
- Carlos Halpern
- José María Sunyer

CVs of each of the Supervisory Board members, showing their background and experience, are available on the website.

B-2 Fit and proper requirements

The Company is authorised by the Central Bank of Ireland ("CBI") and, as such, is

required to comply at all times with the Fitness & Probity (F&P) regime which came into effect on 1 December 2012.

The domestic F&P regime was reviewed in 2015 in order to determine compatibility with Solvency II. The CBI deems that individuals subject to SII F&P notification requirements in Articles 42(2) and 42(3) align to the domestic F&P regime.

Under this regime, an individual that is appointed to a "controlled function" ("CF") must comply with the F&P standards as prescribed under the regulations. A CF is defined as a role that exercises a significant influence on the conduct of the affairs of the Company, monitors compliance or performs functions in a customer-facing role. Certain of these CF roles are referred to in the regulations as "Pre approved controlled functions" (PCFs) and these require the approval of the CBI before appointment.

Taking the nature of the roles into consideration, it is the policy of the Company to ensure that all employees, directors and officers are:

- competent and capable;
- honest, ethical and act with integrity at all times; and

- financially sound.

The Atradius Code on Employee Background Screening sets out when background screening must take place and the manner in which it must be conducted.

In the case of those critical or important functions that are outsourced, the fit and proper requirements will be verified in accordance with the outsourcing policy.

Fitness requirements

The Company is well placed to determine the particular demands of a CF/PCF, i.e. what qualifications, experience, knowledge and other relevant factors will make a person fit for the performance of that function.

The person must be able to demonstrate that he or she:

- Has professional or other qualifications relevant to the function;
- Has obtained skills and the competence to the relevant function through training or experience gained through employment;

- Has a sound knowledge of the business;
- Has comprehensive understanding of the regulatory and legal environment connected to the relevant function;
- Shall not allow personal conflicts of interest to arise in carrying out his or her CFs/PCFs;
- Will be compliant with the CBI Fitness & Probity Standards (which includes the CBI's Minimum Competency Code as applicable).

Probity requirements

Individuals proposed for CFs or PCFs must be honest, diligent and independent-minded and must act ethically and with integrity. Probity is a matter of character illuminated by a person's past behaviour. In general, where a person is found not to be a person of probity due to a lack of honesty, integrity or ethical judgement, that person may not be suitable for any CF or PCF.

Probity may also include individuals ensuring that they act without conflicts of interest.

The person must be able to demonstrate that his or her ability to perform the relevant function is not adversely affected by any of the following;

- has been refused, prohibited, restricted or suspended from the right to carry on any trade, business or profession for which a licence, registration or other authorisation is required by the law or had any such licence or membership revoked;
- has been the subject of any complaint made to the Central Bank, the Financial Services Ombudsman or any equivalent body, reasonably and in good faith, relating to activities regulated by the Central Bank or regulated by an equivalent authority in any jurisdiction;
- is or has been, in any jurisdiction, subject to any disciplinary proceedings or has been issued a warning, reprimand or other administrative sanction or its

equivalent by the CBI or an equivalent measure;

- has in any jurisdiction, been a director, of a company that was struck off the register of companies (or its equivalent) by the Registrar of Companies (or its equivalent) on an involuntary basis,;
- has, in any jurisdiction:
 - i) been convicted of an offence either of money laundering or terrorist financing (or their equivalents);
 - ii) been convicted of an offence which could be relevant to that person's ability to perform the relevant function; or
 - iii) had a finding, judgment or order made against him/her involving fraud, misrepresentation, dishonesty or breach

of trust or where the person is subject to any current proceedings for fraud, misrepresentation, dishonesty or breach of trust.

- has been the subject of any civil penalty enforcement action taken by a regulatory authority under any law in any jurisdiction;
- has been untruthful or provided false or misleading information to the Central Bank or been uncooperative in any dealings with the CBI ;
- the person, or any business with which the person held a position of responsibility or influence has been or is being, in any jurisdiction, investigated, disciplined, censured, suspended or criticised by a regulatory or professional body, a court or tribunal or any similar body, whether publicly or privately;

- has in any jurisdiction, been found by the CBI or any other regulatory authority to have perpetrated or participated in any negligent, deceitful or otherwise discreditable business or professional practice.

Professional propriety means that the person has throughout his or her life upheld the law and adhered to good commercial practices as outlined above and also adhered to good financial practices.

Approval process

For those roles designated as CF roles or PCF roles under the regulations, the Company's Head of Compliance is responsible for coordinating the screening of potential employees and, in the case of PCFs, for securing the approval of the Board to propose the appointment to the regulator and for securing the approval of the regulator before PCF appointment. The Head of Compliance must be satisfied, on reasonable grounds that the potential employee complies with the Fitness and Probity Standards and must obtain written confirmation that the individual agrees to

abide by those standards on a continuous basis.

To obtain the CBI's approval requires the submission of an individual questionnaire ("IQ"), available on the Central Bank's website.

An assessment of compliance with the Fitness & Probity standards must take place at least annually but also in the event of promotion or demotion.

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

The main components of the risk management system are:

- Risk Strategy
- Risk Governance
- Risk Management Policies and Guidelines
- Risk Boundaries
- Measurement / Monitoring / Reporting
- Risk Management Function
- Own Risk and Solvency Assessment

Risk strategy

The risk strategy is the Company's risk appetite framework. It is aligned with the risk strategy of the ultimate parent, GCO, and consists of the following main components:

- **Risk appetite** is the aggregate amount of risk that the Company is willing to assume within a predetermined period;
- **Risk tolerance** is the maximum amount of risk that the Company is willing to assume for a specific type of risk;
- **Risk limits** are operational limits established to facilitate control of risk-taking.

Next to capital-related risk appetite, tolerances and limits, the Company (in alignment with other companies of Atradius) has also established various operational tolerances and limits for different types of risk which are used in the day-to-day operations and embedded in the Company through its risk governance structure (see below). These tolerances include, among others:

- Strategic asset allocation for investments;
- Limitations on exposure or cover terms for countries and industry sectors;
- Group and individual buyer exposure limits;
- Credit risk limits (e.g. for reinsurance, deposits); and
- Policy and Risk Underwriting Authority levels.

Risk governance

The Group has established several risk governance committees to make decisions involving material risks, including the following:

- The Reinsurance Inwards Committee;
- The Operational Risk Committee;
- The Group Investment Committee decides on the tactical allocation of assets within the investment portfolio;
- The Quantitative Model Committee approves quantitative models used within the Company. This includes both internally developed and those externally purchased;

- The Outward Reinsurance Committee recommends on appropriate reinsurance arrangements;
- The Group Credit Committee and five Local Credit Committees underwrite the most material credit limits;
- The Country Committee rates the credit risk of a country and outlines the associated risk underwriting strategy regarding those countries.

These committees are overseen by the Risk Strategy Management Board (RSMB). Its members consist of the Management Board of Atradius N.V., as well as the Atradius Head of Group Finance, the Director of Strategy and Corporate Development and the Director of Group Risk Management.

In addition to the committees that report to the RSMB, the Provisioning Committee assesses and decides on the appropriate amount of claims provisions on both a Solvency II and IFRS basis.

As well as the committee structure, the Company operates within a framework of authority matrices. For treaty and risk underwriting, staff members are assigned well-defined authorities specifying the levels of risk they can take within the framework of the Company's risk governance. Authority levels reflect individual underwriting expertise. Also, the authority matrices specify 2-eyes, 4-eyes and 6-eyes requirements based on the levels of risk involved.

Risk management policies and guidelines

A framework of risk management policies and guidelines ensure alignment with the Company's objectives and (risk) strategy. Policies and guidelines cover areas such as Risk and Policy Underwriting, Reinsurance, FX, Investments, Operational Risk, Business Continuity, Information Security, Compliance, etc.

The risk management policies of the Company are aligned with the policies of GCO. As the ultimate parent, GCO has established a common framework of policies for all the companies within the Group.

Risk boundaries

Risk boundaries give a clear and company-wide aligned understanding of what business the Company wants to underwrite and the lines that it does not want to cross. Risk boundaries are used to govern the business and to enable communication with stakeholders.

Measurement/Monitoring/Reporting

To support the operation of the governance structure, the Company applies a system of measurement and monitoring of risks, as well as reporting, which enables the communication of relevant information to the appropriate decision-makers. Examples of the focus areas in this system are:

Buyer underwriting performance reporting, e.g. provisions, underwriting targets, notifications of non-payment, claims paid and received, recovery success rate, premium earned, acceptance rates, market developments; Exposure distribution information, e.g. distributions of buyer ratings, concentrations in industry sectors, buyer countries, and buyer groups; and

- Economic capital consumption on different levels of granularity.

For measurement of economic capital-related aspects of underwriting risk, the Company employs a proprietary internal model, for measurement of economic capital-related aspects of other risk types, the Company uses the Standard Formula under Solvency II. This “Partial Internal Model” has been assessed and approved for use by the College of Supervisors.

Risk Management Function

The Risk Management Function assists the senior management of the Company with the effective operation of the Risk Management System, including the use of the (partial) internal model.

The Risk Management Function identifies, measures, monitors, reports and takes an aggregated view of risks with the purpose of:

- Monitoring and reporting the risk profile relative to risk strategies in place;
- Monitoring and reporting risk profiles for different risk types and

their contributions to the overall risk profile;

- Analysing the performance with regard to the risk strategies in place.

The Risk Management Function cooperates closely with other central functions such as Underwriting, Finance, Compliance, Internal Audit, Actuarial and with other organizational units within the Group where deemed appropriate.

One of the main tasks of the Risk Management Function is to obtain an independent validation of the Company’s (partial) internal model. The independent validation is outsourced to the independent validation team within the Risk Management Department of Grupo Catalana Occidente. This department provides a comprehensive and independent technical opinion regarding the proper development and operation of the model and the appropriateness of its results, considering the different uses in the management of the Company and the quantification of the solvency capital requirement under Solvency II. The independent validation team operates according to an approved Validation Policy, which describes the methodology

and criteria applied. The validation team shares its findings with the Quantitative Model Committee. The Quantitative Model Committee ensures that model owners take appropriate actions to remediate the findings. This ensures the ongoing quality and appropriateness of the model.

Own Risk and Solvency Assessment (“ORSA”)

The Company has been producing an ORSA Report since 2013. It has an established policy, governance, methodology and team of resources dedicated to execution of its ORSA process.

The Company executes a full ORSA process on an annual basis, but also runs all or part of the process in the event of a significant change in risk profile, retention rates/ceding percentages, Business Plan, internal model parameters or at the request of management of a governance committee of the Company or the ultimate parent.

The ORSA is an integral part of the business, risk management and decision-making processes within the Company. The execution of the ORSA is linked to the preparation of the Company’s Long-Term

Plan and includes an evaluation of risk and solvency positions, assuming both normal and adverse market conditions.

The ORSA includes analyses and reports the main risks to which the Company is exposed, their resulting capital requirements and an evaluation of the feasibility of the business plan over the normal planning horizon.

To determine and assess solvency positions, the various risks to which the Company is exposed are quantified and aggregated using the partial internal model. The results are taken into consideration for management decisions regarding capital management.

Additional information per risk category

In sections C1 to C7 further on in the report (Risk Profile), we provide more information on how risks are identified, measured, monitored, managed and reported for each risk category.

B-4 Internal control system

The Company has established a framework of internal controls to assist in

following the Company's strategy and objectives. The framework consists of numerous components that together comprise:

- **Control environment** - this consists of the employees of Atradius and the environment in which they operate. Aspects to consider include integrity, competence, and shared principles.
- **Risk Assessment** – Atradius must be aware of the risks that pose a threat to the achievement of its objectives. As part of the ICF, risks must be identified, assessed, responded to and monitored.
- **Control activities** – Policies and procedures, therefore including controls, must be in place and executed to ensure that risks are managed in order to safeguard the achievement of objectives. These control activities include elaboration on 'how' specific environmental control aspects are implemented.

- **Information and communication** – Information and communication systems operate across the aforementioned internal control components to enable Atradius to capture and disseminate the information necessary to conduct, manage and control the business; and
- **Monitoring** – The entire internal control framework, including the objectives and components must be monitored to ensure that it is operating as intended and reflects the current goals and vision of Atradius, together with the overall environment in which it operates.

The Internal Audit and Compliance functions are important parts of the internal control system and they are addressed below.

Control environment

The control environment is based upon organizational values and expected standards of conduct. To facilitate adherence to expected standards, senior

management has established structures, standard practices and policies.

Employment practices establish the professional competencies and professional practices expected of the Company's employees. These competencies are outlined in the Company's policies regarding conduct, recruitment, remuneration, appraisal and development of employees. Moreover, the most important employment practices are outlined in specific codes, charters and policies, such as:

- Code of conduct
- Speak up procedure – Policy on whistle-blowing
- Policy on fraud management;
- Policy on customer due diligence;
- Policy on trading in securities;
- Policy on employee background screening;
- Policy on complaint management;
- Policy on auditor independence;
- Policy on anti-trust and fair competition;
- Policy on business in accordance with licenses;
- Policy on external representation;
- Policy on incident reporting;
- Policy on Fitness & Probity;

- Policy on Outsourcing.
- Atradius Group Data Protection Charter;

The Company has established various control mechanisms, implemented through policies and procedures related to organizational structures, organisational values and employment practices.

Organisational structures define roles, responsibilities, authorities and reporting lines. Within the Company, two main organisational structures exist: the managerial structure and the risk governance structure. Both structures outline the levels of authority delegated to the Company's employees when underwriting or transacting. This authority typically depends on an employee's function and competency.

Risk assessment

Key mechanisms to ensure that the Company has identified and understands and responds to the risks it faces include (but are not limited to):

- Strategy setting and long-term business planning;

- Periodic business review meetings between the Management Board and business units; and
- Risk Management System (see Section B-3 for further detail). This includes items such as the ORSA process, risk strategy setting and review, risk governance, and the risk management function).

Control activities

The Company implements various control mechanisms. These are established through policies and procedures embedding segregation of duties, approvals, verifications, management reviews, and reconciliations.

Segregation of duties is embedded in the Company's underwriting process and in its financial transactions. A financial transaction is commonly segregated by splitting the roles into an initiator, an approver, a verifier, a recorder and a reconciler. Each role is in principle held by a different employee. This reduces the risk of erroneous or inappropriate payments. Approvals are embedded in the Company's underwriting and financial transactions processes and are formalised in a Board of

Directors' approved authority matrix. Verifications are also embedded in the Company's underwriting and financial transactions processes.

Underwriters must disclose their identity when accessing the underwriting system. The same principle applies for access to the financial systems. Moreover, as part of a financial transaction, the written signature of an approver is confirmed by an employee acting as the verifier.

Management regularly reviews, including at monthly management meetings, presentations and/or updates the Company makes to Atradius Group Committees of which it is a member e.g. Group Investment Committee (GIC), Reinsurance Inwards Committee (RIC),

management reports (financial and other key performance indicators) to monitor performance against budget, forecast, prior period, etc., to assess the extent to which the Company's objectives are being achieved and to identify adverse developments.

Examples are:

- monthly management accounts detailing the financial performance and position of the Company;
- Risk Reports – management information giving an overview of the Company's risk profile for different risk categories.

- monthly management reports detailing the financial performance of the third party business;
- development by underwriting year;
- client profitability reports detailing performance by cedant;
- investment reports which details the investment performance and investment position of the Company in terms of returns and allocation.

Information and Communication

The Company communicates internally through policies and procedures, but also through channels such as intranet, emails and newsletters.

To ensure that negative information can also be communicated upward, the Company has established a code on whistleblowing. This code establishes an alternative communication channel to the

Director of Internal Audit, which employees can use to communicate negative information.

For the purposes of this document, the key mechanisms in place within Atradius for the component 'Information and Communication' include:

Mechanisms	Description
Annual report	Annual report of the Company.
Atradius intranet	Internal intranet site hosting key information and news for all units.
Risk report	Management information compiled for the board of directors which gives an overview of the Company's risk profile – an overview of exposure from different risk types.
Monthly management report	Monthly analysis, review and reporting of financial and non-financial KPI's for the Company's business.
ORSA	Own risk and solvency assessment - process to identify, assess, monitor, manage, and report the short and long term risks and to determine the own funds necessary to ensure that overall solvency needs are met at all times, taking into account the risk profile, approved risk tolerance and business strategy.
Investment report	A report detailing the investment performance and investment position of the Company in terms of returns and allocation. In addition, it details the credit rating of the debt instruments, the investment position split per currency and its value-at-risk.

Monitoring

The entire internal control framework must be monitored to ensure that it is operating as intended and reflects the current objectives and environment. The Company has implemented various mechanisms, such as control self-assessments, incident reporting and internal audit exercises'.

Control-self assessments are performed to monitor the effectiveness and efficiency of the Company's financial reporting controls ("FRC's") and non-financial reporting controls.

Financial reporting control self-assessments are performed on a quarterly basis to ensure that the Company's financial

statements exclude material errors by preventing errors occurring or detecting errors that have occurred.

To facilitate monitoring, controls are stored in an online portal that details:

- what controls are in place;
- why the control is performed;
- which functions and employees perform the control;
- when and how often; and
- who is responsible for the control.

In addition, evidence of performance of controls is stored for review, if necessary.

For the purposes of this document, the key mechanisms in place within the Company for the component 'Monitoring' include:

Mechanisms	Description
Business review meetings	Periodic review between the management board of the Atradius Group and the Company.
Internal audit reviews	Five-year review cycle by internal audit focused on perceived areas of greatest risk.
Control self-assessments	Periodic assessments of key controls across the business in order to gain assurance over their design and operation.
Financial reporting controls	Quarterly assessments of key controls over the accuracy of the financial statements, in terms of their design and operation.
IT general controls	Quarterly assessments of IT General controls in terms of their design and operation.
ORSA	Own risk and solvency assessment process plays a central role in monitoring risk profile and solvency needs.
Code on incident reporting	Sets the requirements relating to the reporting and resolution of significant incidents.
Operational losses	Recording and analysis of operational risk event losses.

B-5 Outsourcing

Introduction

The Outsourcing Policy describes, in general terms, the approach and process for outsourcing from the inception to the end of the contract, including:

- the Solvency II criteria that are relevant to consider when outsourcing critical or important functions or activities;
- how a Provider of outsourced services ("The Provider") of suitable quality is selected;
- the details to be included in the Outsourcing Contract with the Provider; and
- business contingency plans.

The Company can outsource critical functions or activities, but must retain overall responsibility for discharging all of its obligations under applicable laws, rules and regulations and must ensure that appropriate management controls and procedures operate to protect the Company and to ensure compliance with applicable laws, rules and regulations.

Key Functions are the following functions: risk management, compliance, internal audit and the actuarial function. A PCF individual within the Company must be identified as having responsibility for the outsourced function and must be notified to the CBI.

Approvals

The Board of Directors of the company approves all outsourced services of critical or material functions/activities and such approvals must be notified to the CBI in accordance with the notification process for (re)insurance undertakings when outsourcing critical or important functions or activities under Solvency II.

Critical or material functions/activities

Critical or material functions/activities relate to the core business of Atradius Re, that would otherwise be performed by the Company itself and that are essential to its operation as it would be unable to deliver its services to policyholders without the function or activity.

The following are examples of functions/activities that can be considered critical or important functions/activities:

Key Function;

- The design and pricing of reinsurance products;
- The investment of assets or portfolio management;
- The provision of information systems management and maintenance in relation to the core activities of the Company.

The following are examples of functions/activities that should not be considered as critical or important functions/activities:

- advisory & other services which do not form part of AtRe's reinsurance activities (e.g. legal advice, trainings, billing services and the security of premises and personnel)
- the provision of logistical support (e.g. cleaning or catering);

- the provision of data storage;
- the provision of elements of human resources support (e.g., payroll processing).

For any new Outsourcing Contract or for the renewal of an existing Outsourcing Contract, the preparation, relevant assessments, due diligence and selection must be performed by the relevant business area/unit (under responsibility of the Managing Director). The due diligence and selection process involves understanding the main risks that may arise from the Outsourcing, identifying the most suitable strategies for the mitigation or management of these risks and ensuring that the Provider has the ability, capacity and authorization required by law (if applicable) to perform the Outsourcing reliably and professionally. The conclusions are to be documented by the relevant business unit under the responsibility of the Managing Director.

Outsourcing Key Functions

If the company intends to outsource a Key Function, the following subjects must be addressed:

- it applies fit and proper procedures in assessing persons employed by the Provider that will perform an outsourced Key Function for the Company, which means it ensures that the Provider checks the fitness and propriety of all persons working on the Key Function;
- it ensures that the person(s) within the Company designated with overall responsibility for overseeing the outsourced

Key Function possesses sufficient knowledge and experience regarding the outsourced Key Function as to be able to challenge the performance and results of the Provider. This person is to be notified to the Regulator.

Outsourcing of Critical or Important Operational functions

- **Actuarial Function (Key Function)**

The Actuarial Function is outsourced via an intra-group outsourcing arrangement. The jurisdiction of the service provider of this function is Spain.

- **Internal Audit (Key Function)**

The Internal Audit Function is outsourced via an intra-group outsourcing arrangement. The jurisdiction of the service provider of this function is Spain.

- **Investment Activities** are outsourced via an intra-group outsourcing arrangement. The jurisdiction of the service provider of this function is Spain.

- **IT Activities and Telecoms support** services are outsourced via an intra-group outsourcing arrangement. The jurisdiction of the service provider of this function is Spain.

- **Reinsurance Accounting Database System support** services are outsourced to a service provider located in Bermuda.

The Outsourcing Contract:

An Outsourcing Contract must, where applicable, address the following issues (not exhaustive) and be drafted in consultation with the Head of Compliance, and Group Legal and Compliance as necessary:

- outline the responsibility of each party to the contract;
- be for a specified period, i.e. have a commencement and end date;
- allow for periodic reviews;
- include performance benchmarks or standards and process for advising AtRe of a potential or actual inability to provide services;
- include dispute resolution processes plus termination clauses;
- include appropriate confidentiality clauses;
- include liability provisions;
- specifically outline any sub-contracting of outsourcing by the Provider (so that the same standards apply equally in all aspects to the Provider and the sub-contractor);
- cost, invoicing and payment details;
- disclosure obligations for the Provider of developments that may materially impact the Outsourcing;
- availability of an adequate business continuity plan and process at the Provider in the event of any inability to provide the service by the Provider;
- include obligations for the Provider to comply with applicable laws and regulatory requirements relevant to the

Atradius Re (such as obligations to cooperate with the Regulator in connection with the Outsourced function or activity);

- include the right of access for Internal Audit, the external audit firm and the Regulator to relevant documentation related to the Outsourcing (including documentation on fit and proper testing of Key Functions) and the right to conduct on-site visits at the Provider;
- provide for the way in which the Outsourcing Contract can be terminated, to allow the Company to be able to perform the outsourced activities itself, or outsource the activities to another provider.

Internal (intragroup outsourcing):

When Outsourcing to a Provider within the GCO group, the following applies:

- in relation to outsourcing of a Key Function, the group entity that performs the Outsourcing must (a) document which function/activity relates to which legal entity in the group, and (b) ensure that the performance of the function/activity at the level of the outsourcing entity is not impaired.
- the due diligence and selection process of the Provider may be less detailed if Atradius Re has greater familiarity with the Provider and if the Company has sufficient control over, or can influence the actions of, the Provider.

- A written agreement must exist, stipulating the duties and responsibilities of both parties. This can take the form of a less detailed agreement than the contract required for external outsourcing.

B-6 Any other information

n/a

C. Risk Profile

C-0 Introduction

C-1 Underwriting risk

C-2 Market risk

C-3 Credit risk

C-4 Liquidity risk

C-5 Operational risk

C-6 Other material risks

C-7 Any other information

C-0 Introduction

The principal risks to which the Company is exposed are underwriting risk, market risk, credit risk, liquidity risk and operational risk, each of which will be described in this section of the report.

In 2017, the Company was granted regulatory approval to use a Partial Internal Model ("PIM") to calculate regulatory capital requirements. The Company uses its internally developed economic capital model for most of the non-life underwriting risk module and the Standard Formula for the market, counterparty and operational risk modules – hence the "Partial" Internal Model.

The table on the following page illustrates the contribution of the risk types described

in this section to the Basic Solvency Capital Requirement (BSCR), calculated using the Partial Internal Model.

Market Risk:	FY19	FY18
Interest Rate Risk	9	6
Equity Risk	29	18
Spread Risk	26	16
Currency Risk	23	23
Concentration Risk	6	3
Total undiversified	93	66
Diversification	(29)	(20)
Total diversified	64	46
Non-Life UW Risk:		
Internal Model	410	395
Premium and Reserve Risk	2	2
Catastrophe Risk		
CAT recession scenario	2	2
CAT default scenario	-	-
CAT other scenario	-	-
Total undiversified	2	2
Diversification	-	-
Total diversified	2	2
Lapse Risk	-	-
Total undiversified	414	399
Diversification	(1)	(1)
Total diversified	413	398
Counterparty risk	14	12
BSCR:		
Total undiversified	491	456
Diversification	(50)	(38)
Total diversified	441	418
Operational Risk	16	15
SCR		
Total before tax adjustment:	457	433
Tax adjustment	(30)	(30)
Solvency Capital Requirement	427	403
MCR	107	106
Eligible own funds	768	706
SCR Coverage ratio	180%	175%
MCR Coverage ratio	668%	611%

C-1

Underwriting risk

In terms of the basic solvency capital requirement (BSCR) calculated under the partial internal model, underwriting risk is by far the largest driver of the Company's SCR with a charge of EUR 413 million (2018: EUR 398 million), representing 84% (2018: 87%) of the BSCR of EUR 491 million (2018: EUR 456 million) before diversification.

in EUR million

	FY19	FY18
Non-Life UW Risk		
Internal Model	410	395
Premium and Reserve risk	2	2
Catastrophe Risk	2	2
Lapse Risk	0	0
Total undiversified	414	399
Diversification	(1)	(1)
Total diversified	413	398

Identification

Non-life underwriting risk is defined as the risk arising from the non-life insurance obligations in relation to the liability covered and the process used in the conduct of the business. The Company incurs underwriting risk through its reinsurance contracts, whereby it assumes the risk of loss from organisations that are directly subject to underlying loss. It takes account of uncertainty in the results of these organisations related to existing insurance and reinsurance

obligations, and to new business to be written over the following 12 months. The Company is exposed to the uncertainty surrounding the timing, frequency and severity of claims under these contracts, in addition to unexpected premium developments.

Non- life underwriting risk is directly related to the nature of our business. Through credit reinsurance, we reinsure customers against the risk of non-payment of trade receivables. Through bonding reinsurance, we guarantee a beneficiary that our customers will meet contractual, legal or tax obligations.

Measurement

Underwriting risk is measured both on individual treaties and exposures and on the aggregated risk portfolio using several risk metrics and tools, such as:

- internally developed economic capital model;
- total potential exposure (TPE: sum of registered credit limits);
- a list of insurance buyers over certain limits in accordance with reinsurance agreement conditions;
- application of underwriters estimates of premium income, ultimate loss ratios and ultimate commissions ratios to an actuarial risk earnings model to evaluate the appropriate earned income, reserves setting and costs basis for each reinsurance contract;
- measurement of reinsurance contract performance against control limits set by the underwriting guidelines.

Management and mitigation

Underwriting risk is managed both on an individual cedant and aggregated basis by using a variety of tools, such as:

- regular detailed review of all reinsurance business for past underwriting years performance, triangulation development, individual buyer exposure development and aggregate total potential exposure management, market and country exposure;
- monitoring of risk and policy limit setting to ensure credit quality and performance of the underlying insurance products to reinsurance terms agreed with the client;
- reinsurance underwriting guidelines which define and curtail the type of business the Company is authorised to write, with specific guidelines to type of product, capacity limit, types of exposure, term and diversity of the underlying insurance ceded;
- exposure management through monitoring of total potential exposure including the list of insurance buyers over certain limits in accordance with the reinsurance agreement conditions; and
- reinsurance: the Company transfers a portion of its reinsurance risk to external reinsurers/retrocessionaires, through a number of reinsurance arrangements that include quota share and excess of loss treaties. The reinsurance treaties are reviewed annually and in accordance with the Company's policy to select only reinsurers with a high quality standard of solvency/rating. The normal minimum

requirement is an 'A' level rating. During these annual reviews, the Company assesses the optimal structure of the treaties for the forthcoming period(s), including the excess of loss treaties (the attachment points, spread of the layer and the number of reinstatements).

Monitoring and reporting

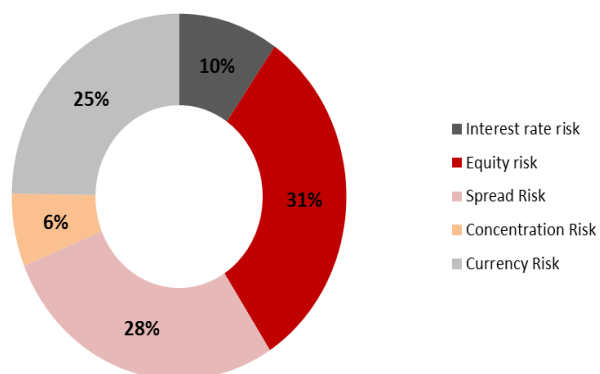
The Company has a number of risk management tools available to monitor the reinsurance portfolio for performance, exposure and financial development. The reinsurance system is used to record the risk profile, and to provide information for each reinsurance treaty. This allows the reporting of performance, total aggregate exposure and accounting reinsurance result.

The reinsurance system provides triangulation reporting, earnings estimates, categorisation of risks and market summary details. It automatically provides a suite of reports which give the underlying performance data for review by our reinsurance accounts, risk management, actuarial and finance areas. In addition to monitoring and recording TPE by treaty assumed on the reinsurance system, the Company also uses a buyer database to monitor individual reported buyer exposure limits issued by the original cedant that are in excess of agreed reporting thresholds. The Company uses the economic capital model as a tool to monitor the economic capital required by the reinsurance portfolio. This is calculated and reviewed quarterly.

C-2 Market risk

Identification

Market risk is the risk that arises from the level of volatility of the market price of the Company's financial assets and liabilities: in particular its investment portfolio.



in EUR million

Market Risk

	FY19	FY18
Interest rate risk	9	6
Equity risk	29	18
Spread Risk	26	16
Concentration Risk	6	3
Currency Risk	23	23
Total undiversified	93	66
Diversification	(29)	(20)
Total diversified	64	46

In terms of the basic solvency capital requirement (BSCR) calculated under the partial internal model, market risk with a charge of EUR 64 million (2018: EUR 46 million) represents 13% (2018: 10%) the BSCR of EUR 491 million (2018: EUR 456 million) before diversification.

The Company is exposed to market risk by obtaining assets and incurring liabilities which value is sensitive to movements in market prices and currency exchange rates. This risk is assumed and incurred by:

- investing in debt instruments;
- investing in equity instruments;
- underwriting insurance contracts generating provisions for future claims payments; and

- obtaining assets and incurring liabilities denominated in foreign currency.

Measurement

Market risk is measured by using several risk metrics, including:

- value-at-risk;
- capital models of external credit assessment institutions; and
- interest rate duration.

Value-at-risk and capital models from external credit assessment institutions are both used to determine potential maximum loss for a given confidence level on the Company's financial instruments due to adverse movements in market prices or counterparties creditworthiness. Interest rate duration assists in determining sensitivity of debt instruments and claims provisions to movements in interest rates.

Management

Market risk is managed in several ways, such as:

- restriction on investment types, e.g. widely traded capital market instruments versus derivatives;
- diversification of the investment portfolio; and

- restrictions on the interest rate duration of the debt instruments portfolio and implementation of a strategic asset allocation (SAA).

Mitigation

Market risk is mitigated on several layers in the undertaking. Firstly, constraints are set in the Group Investment Policy that has to be reviewed and approved by the Board of Directors. This policy gives the risk taker limits in which investment risk can be taken. Monitoring of compliance is undertaken by the Atradius Group Investment Committee, of which the Finance Director ("FD") of the Company is a member with full voting rights. This committee is responsible for taking investment decisions by majority vote and monitoring compliance with the Group Investment Policy. The Company's policy is to invest only in investment grade, liquid investments taking into account the short interest rate duration of the claims provisions. Furthermore, the policy regarding financial instruments is to invest only in capital market instruments and refrain from investing in derivative instruments.

Monitoring and reporting

Market risk is monitored by and reported to the Atradius Group Investment Committee, on which the FD of the Company is a member with full voting rights. The Group Investment Committee meets monthly and reviews metrics such as the value-at-risk, the interest rate duration of the investment portfolio and degree of diversification/concentration of the investment portfolio. The Board of Directors reviews similar management information regarding the Company's investments on a quarterly basis.

Prudent person principle

The Company uses an asset liability management (ALM) approach to analyse the impact of market risk on its assets and liabilities. Additionally, through the use of Solvency II constrains the Company aims to define the strategic asset allocation (SAA), so that the commitments resulting from the exposure to purchased assets and the Company's insurance liabilities can be met while maximizing the expected investment return within given risk and capital constraints.

The investment process complies with the 'prudent person' principles:

- all assets covering technical provisions should be invested in a manner appropriate to the nature and duration of the firm's liabilities.

- investments shall only be made into assets whose risks can be properly identified, understood, measured, monitored, managed, controlled and reported.
- all assets shall be invested in such a manner as to ensure the security, quality, liquidity and profitability of the portfolio as a whole.
- non-traded investments shall be kept to prudent levels.
- exposure to speculative grade assets must be prudent.
- derivatives should be used only to reduce risks or facilitate efficient portfolio management; assets shall be properly diversified (asset type, issuer, group, region) to avoid excessive accumulation of risks in the portfolio as a whole.

C-3 Credit risk

Identification

Credit risk (also referred to as counterparty default risk) is the risk of an adverse change in the Company's profit and changes in the creditworthiness of a counterparty.

In terms of the basic solvency capital requirement (BSCR) calculated under the partial internal model, credit risk with a charge of EUR 14 million (2018: EUR 12 million) represents 3% (2018: 3%) of the BSCR of EUR 491 million (2018: EUR 456 million) before diversification.

The Company is exposed to credit risk by obtaining assets whose face value depends on its counterparties ability to repay their obligations in full when due. This risk is incurred by:

- investing in debt instruments;
- depositing cash at credit institutions; and
- entering into reinsurance agreements.

Measurement

Credit risk is measured using several risk metrics, such as:

- capital models developed by external credit assessment institutions;
- credit ratings issued by external credit assessment institutions;
- payment history of reinsurance contract-holders; and
- days-past-due reports (credit control reports).

Developments in these main risk metrics (as well as other information) are monitored and assessed to ensure that the exposure to credit risk is maintained within acceptable boundaries.

Management and mitigation

A credit rating issued by an external credit assessment institution is used to ensure that the Company invests only in a debt instrument or enters into a reinsurance contract with an acceptable likelihood of being settled. Currently, the policy is to invest only in debt instruments with a

credit rating of 'A-' or higher and to only enter into reinsurance contracts with reinsurers with a credit rating of 'A-' or higher.

In the event that the credit rating of a debt instrument falls below the minimum, the Group Investment Committee must decide whether the Company should divest the instrument. In the event that the credit rating of a reinsurer falls below the minimum, the reinsurance contract allows the Company to terminate the reinsurer's subscription to the reinsurance treaty or to require extra collateral from that reinsurer.

Monitoring and reporting

Credit risk is monitored and reported to the Group Investment Committee, Reinsurance Outwards Committee (ROC) and the Risk and Strategy Management Board, of the Atradius Group. In addition, credit risk is reported on to the Atradius Re Risk Committee.

The Group Investment Committee meets monthly and reviews the distribution of credit ratings within the investment portfolio, while the Risk and Strategy Management Board performs the same review of the investment portfolio on a

quarterly basis. The Reinsurance Outwards Committee, which is an Atradius Group Committee, meets quarterly and reviews the credit ratings of reinsurers subscribing to the Company's reinsurance treaties. Counterparty ratings and counterparty default risk SCR are elements of the Atradius Re Board approved Risk Appetite Statement, which is reported on quarterly to the Company Risk Committee.

C-4 Liquidity risk

Identification

Liquidity risk may arise due to insufficient funds being available to meet cash flow requirements (funding liquidity risk), but also due to illiquidity of the assets held to meet the cash flow requirements (asset liquidity risk).

Measurement

The Company measures its liquidity risk by forecasting its required payments and comparing these to its cash positions.

Management

Liquidity risk is managed by using several tools, such as:

- holding marketable financial instruments that have daily pricing and the ability to be liquidated in a reasonable time period;
- holding of ample cash reserves;
- monitoring of cash reserves to ensure sufficient liquidity.

Mitigation

The primary risk mitigating practice is the monitoring of ongoing cash flow patterns combined with the maintenance of levels of cash and highly marketable securities that reflect expected cash needs.

The management and mitigation of liquidity risk by the above management tools is reinforced by the Group investment policy: that investments should be only in financial instruments that can be liquidated in less than four business days. In practice, most of the Company's assets

are marketable securities that can be readily converted into cash when required.

Monitoring and reporting

The cash positions are monitored daily and reported on a weekly basis.

Expected profits in future premiums (EPIFP):

The expected profits in future premiums (EPIFP) figure calculated in accordance with Article 260(2) of the Delegated Regulations at the end of 2019 was EUR 22 million (2018: EUR 23.6 million).

C-5 Operational risk

Operational risk is the "risk of loss arising from inadequate or failed internal processes, or from people and systems, or from external events". The Solvency II Directive also states that operational risk "shall include legal risks, and exclude risks arising from strategic decisions, as well as reputation risks".

Using the Standard Formula for calculation this risk represents 3% of the Company's SCR, with a charge of EUR 16 million (2018: EUR 15 million, 3%).

The Company uses a framework for identifying, assessing, responding to and monitoring operational risk, which is based in part on the Committee of Sponsoring Organizations' Enterprise Risk Management (COSO ERM) Integrated Framework. The framework ensures that operational risks are considered in all parts of the Company and that objectives are more likely to be met with fewer surprises along the way.

Within the Atradius Group, the Operational Risk Committee (ORC) is responsible for developing methods for the identification, assessment and response to risks, and for monitoring and further enhancing the overall risk management and control framework.

Identification

Operational risk is inherent in all the Company's key activities. The Company has developed a number of methods and tools to support not only identification, but

also assessment and management of operational risk such as:

- risk registers;
- risk and control self-assessments;
- financial reporting controls;
- training (such as fraud awareness training);
- monitoring of indicators of risk in the various sub-categories of operational risk.

Risks and the related controls are discussed at all levels, across the business.

Measurement

A local risk register is maintained and updated on a quarterly basis. The risk registers contain risks that management identifies as significant risks to achieving objectives and contain primarily operational risks.

Management and Mitigation

To provide oversight and assurance in an auditable and efficient manner, the Company employs a dedicated governance, risk and compliance software platform (the "GRC portal") that integrates existing risk management activities across the business.

Operational risk is managed through a framework of internal controls that address the different areas where such risk is present. This internal control system includes:

- policies, procedures and standards;
- business continuity plans;
- manual and automated operational controls such as the segregation of duties, the application of signing authorities and role-based system privileges; and
- board approved authority matrix which must be read and understood by all staff, as evidenced by

employee signature, and which outlines approval requirements.

Monitoring and reporting

As noted above, the Company has a number of operational risk management tools, including risk registers, risk and control self-assessments and financial reporting controls, which are also used to monitor and report operational risk.

C-6 Other material risks

C-6.1 Concentration Risk

Identification

The Company is exposed to concentration risk primarily by accumulation of assets with a debtor and or underwriting exposure credit limits on a cedant, within a country, or within a trade sector.

Management and mitigation

Concentration risk is managed using several management tools, of which the

most important is concentration limits. For example, on the asset side, the Company limits investments with a single counterparty to less than 5% of the investment portfolio (this applies to non-government counterparties only). In terms of reinsurance, exposures are closely managed to monitor accumulations of risks across cedants and to assess the potential risk of claims occurring from the failure of individual companies (or a group of related companies).

Monitoring and reporting

Concentration risk is monitored and reported to the Group Investment Committee, the Reinsurance Inwards Committee, and the BOD depending on the type of concentration risk.

The Group Investment Committee meets monthly and reviews adherence to the policy on concentration limits for the investment portfolio while the BOD performs a similar review of the investment portfolio on a quarterly basis.

The Reinsurance Inwards Committee (RIC) reviews quarterly the concentration of

credit limits underwritten by country, by trade sector and for the top 20 buyers.

Before each annual renewal of the Company's excess of loss reinsurance treaty, the Reinsurance Outwards Committee (ROC) reviews the proposed reinsurance treaties and adherence to the concentration limits for reinsurance treaties.

By nature the portfolio diversification is high with a well-diversified geographical spread. As can be seen from the tables below, our principal concentrations are in Europe, due mainly to Group business that we assume from Atradius Crédito y Caucción S.A. de Seguros y Reaseguros ("ACyC") and also non group third party business. Our exposures in Asia and South America are mainly attributable to our third party non group business, which is outside the risk assumed from the primary markets of ACyC, thus contributing positively to our diversification profile. Within all of these regions, a well-diversified spread by country and cedant is maintained.

	TPE 2019 €'000	%	TPE 2018 €'000	%
Europe	118,663,238	65.73%	131,172,748	71.52%
Asia	28,119,286	15.57%	23,964,975	13.07%
North America	20,825,854	11.54%	17,980,880	9.80%
South America	6,185,980	3.43%	3,669,507	2.00%
Oceania	3,619,001	2.00%	4,473,334	2.44%
Africa	3,129,655	1.73%	2,141,244	1.17%
Total	180,543,014	100.00%	183,402,688	100.00%

C-6.2 Qualitative Risks

The following is a summary of the principal qualitative risks to which the Company is exposed:

Strategic risk: This is the risk arising from changes in the business environment and from adverse business decisions, improper implementation of decisions or lack of responsiveness to changes in the business environment. It is the risk related to strategic planning, market developments and reputation.

Strategic risk categories are used to structure the process of identifying and assessing strategic risks. The main categories used within the Company are:

- Allocation of resources (risks linked to an inadequate strategic planning and budgeting process).

- Market developments (risks linked to market developments - economic environment, clients, competition).
- Reputation (risks linked to an adverse change in the reputation or image of the Company).

At least annually the company identifies and analyses strategic risks through various internal channels such as: the Strategy Forum (an internal discussion of strategic initiatives), the Strategic Risk Platform (comprised of senior management from various parts of the business to evaluate identified risks), the Economic Research Department's overview of long-term macro-economic risks, megatrends analyses, risk registers of individual business units, and quantifications of required and available capital in the long term planning and ORSA processes.

Information and Communications Technology (ICT) Risk: One type of operational risk is the risk of financial loss, disruption or damage to reputation due to failure of IT systems. The Company considers and addresses various risks, including a disastrous event impacting a data centre, security incidents, network vulnerabilities, unauthorised activity, malicious code changes, and application specific vulnerabilities. A dedicated information security team is in place which actively monitors and takes action against threats. In addition to investments in defences and expertise, the Company also runs internal exercises to ensure the proper level of awareness among employees. Among the various measures taken, central event monitoring and logging software is in place, code quality tools are used in all projects and maintenance streams and application-specific vulnerabilities are addressed.

C-7 Any other information

Sensitivities of the risk profile are regularly explored by sensitivity tests as well as stress tests/scenario analyses. In the first, individual risk parameters and/or volume measures are shocked while in the

second the combined effect of several adverse developments is considered. Scenario analysis and stress testing activities are executed group-wide, embedded in the Company's risk management process, and serve the purpose of examining the business' resilience.

This section describes sensitivity tests for different risk categories and overall scenario analyses, and quantifies the impact on the solvency ratio. The solvency ratio is the key metric for Atradius Reinsurance DAC to measure its ability to meet its obligations.

C-7.1.a Sensitivity Analyses

As at 31 December 2019, the impact of external factors related to various risk types on the Company has been assessed. For each sensitivity analysis the impact on the Solvency Ratio Coverage (as percentage point) is shown below.

Summary of Sensitivity Analyses

Scenario	Risk Type	Solvency Ratio
Default of largest buyer	Underwriting risk	-5%
Decrease of premium volume by 5%	Underwriting risk	-5%
Interest rate +1%	Market risk	-2%
Interest rate -1%	Market risk	2%
Equity prices -10%	Market risk	-1%
Equity prices -25%	Market risk	-3%
Impairment of corporate bonds according to S&P transition matrix	Market risk	0%
Increase of credit spread by 1%	Market risk	-3%

1. Underwriting Risk Sensitivity – Default of the Largest Buyer

Underwriting risk represents the most material risk for the Company. Large buyer defaults can happen and, hence, sensitivity tests for this risk are conducted. The assessment focuses on immediate own fund impact.

Effect of largest buyer default	Solvency Ratio
Baseline	180%
Default of Largest Buyer	175%
Impact	-5%

In the event of the default of the largest exposure, the solvency ratio would decrease by approximately 5% pts due to a decrease in own funds.

2. Underwriting Risk Sensitivity – Decrease of Premium Volume by 5%

In this scenario, we assess the sensitivity of the risk profile on a premium volume decrease. A reduction of premium volume by 5% is considered for this purpose. The impact of this sensitivity assessment on the solvency ratio is shown below.

Effect of decrease of premium Volume by 5%	Solvency Ratio
Baseline	180%
Decrease Premium -5%	175%
Impact	-5%

The solvency ratio would decrease by 5% pts driven by reduced own funds.

3. Market Risk Sensitivity – Increase / Decrease of interest Rates by 1% point

Atradius Re is exposed to market risk – for example including fluctuations in interest rates and their term structure. Interest rates play a role in both, the valuation of assets and of liabilities (technical provisions). This analysis quantifies the impact of $\pm 1\%$ change in interest rates by applying a parallel shift to the interest term structure.

Effect of Increase/Decrease Interest rate by 1% pt	Solvency Ratio
Baseline	180%
Interest Rate +1%	178%
Interest Rate -1%	182%
Impact Interest Rate +1%	-2%
Impact Interest Rate -1%	+2%

Under both scenarios, the own fund impact outweighs the SCR impact. Overall, the impact on the solvency ratio is limited.

4. Market Risk Sensitivity – Decrease Equity by 10% / 25% points

Equity holdings represent exposure to market prices. The sensitivity to reductions in equity valuations are explored by assuming decreases of 10% and 25% points, respectively. Under such assumptions, Eligible Own Funds would reduce in line with the

reduction in equity value. As a result of that, this scenario would imply a slight decrease of the solvency ratio for the Company.

Effect of decrease equity value by 10% / 25%	Solvency Ratio
Baseline	180%
Equity -10%	179%
Equity -25%	177%
Impact Equity -10%	-1%
Impact Equity -25%	-3%

5. Market Risk Sensitivity – Impairment of Corporate Bonds

The sensitivity of the solvency ratio to credit rating migrations of corporate bonds is tested following Standard & Poors' one year transition probability matrix. The SCR would only slightly increase in this setting due to the application of worse credit rating. The solvency ratio would remain largely intact.

It is noteworthy that the exposure of the Company to an impairment of corporate bonds is limited as most corporate bonds have an A

rating or higher. Those bonds have low transition probability to inferior credit ratings.

Effect of impairment corporate Bonds	Solvency Ratio
Baseline	180%
Impairment Corporate Bonds	180%
Impact	0%

6. Market Risk Sensitivity – Credit Spread increase by 1%

This scenario assumes that credit spreads on non-government bonds increase by 0.1% pt. As a result, own funds would slightly decrease while leaving the solvency ratio essentially unchanged.

Effect of increase in credit spread	Solvency Ratio
Baseline	180%
Credit Spread +1%	177%
Impact	-3%

C-7.1.b Scenario Analyses

Scenario Analyses

The interplay and simultaneous occurrence of adverse developments are considered as part of the annual Own Risk

and Solvency Assessment (ORSA) process. These analyses take a holistic approach and consider the impact of scenarios on the balance sheet, profit and loss statements and ultimately on the solvency needs. Various scenarios are investigated to study the solvency ratio development over a multi-year time horizon, including

expected (base) and adverse developments.

The most recent ORSA has considered among others a prolonged global recession scenario with simultaneous adverse developments on revenues, claims, and the value of the investment portfolio.

The following table summarizes the scenario assumptions:

Used Variables	Shocks	Balance Impact
Revenues	-5% in year t with moderate increase thereafter	Indirect effect on B/S, mainly through retained profits and foreseeable dividends
Total Potential Exposure	-19% in year t due to management actions and slow growth thereafter	Indirect effect on B/S mainly through reinsurance recoverables and best estimates/risk margin (incl. other assets & other liabilities)
Claims Ratio	At 88% with slow recovery thereafter	
Equities	-10% in year t	Reduction in market value
Corporate Bonds, Government Bonds, Structured Notes	-2.5% in year t	Reduction in market value

The scenario and its assumptions are based on 2019 information, so that year t represents a hypothetical year 2020 under the assumptions above.

Even under these overall adverse conditions considered, the Company SCR coverage would decrease to 157%.

D. Valuation for solvency Purposes

D-0 Introduction

D-1 Assets

D-2 Technical provisions

D-3 Other liabilities

D-4 Alternative methods for valuation

D-5 Other Information

D-0 Introduction

Valuation for solvency Purposes

The Solvency II valuation principles are in accordance with articles 75-86 of the Solvency II Directive, articles 7-16 of the Delegated Acts and the secondary Solvency II laws and regulations.

The financial statements are prepared in accordance with accounting standards issued by the UK Financial Reporting Council FRS 102 “The Financial Reporting Standard applicable in the UK and the Republic of Ireland” and FRS 103 “Insurance Contracts” (“UK and Irish GAAP”).

For a full description of the applicable Solvency II valuation principles, please refer to Annex F-3 of this document.

Both the Solvency II balance sheet and the financial statements of Atradius Re are presented in the currency of the primary economic environment in which it operates (its functional currency). Both the Solvency II balance sheet and the financial

statements are presented in thousands of Euro (EUR).

On the following page are overviews and descriptions of the principal differences between the Solvency II economic balance sheet and the financial statements. When analysing valuation differences between the two different bases, it is necessary to consider the criteria for reclassifications e.g. accrued interest which is included in other assets in the financial statements, is part of the financial investments in the Solvency II balance sheet. Such reclassifications have no economic impact. For full details of the different valuations and re-classifications, please refer to Annex F-2 of this document.

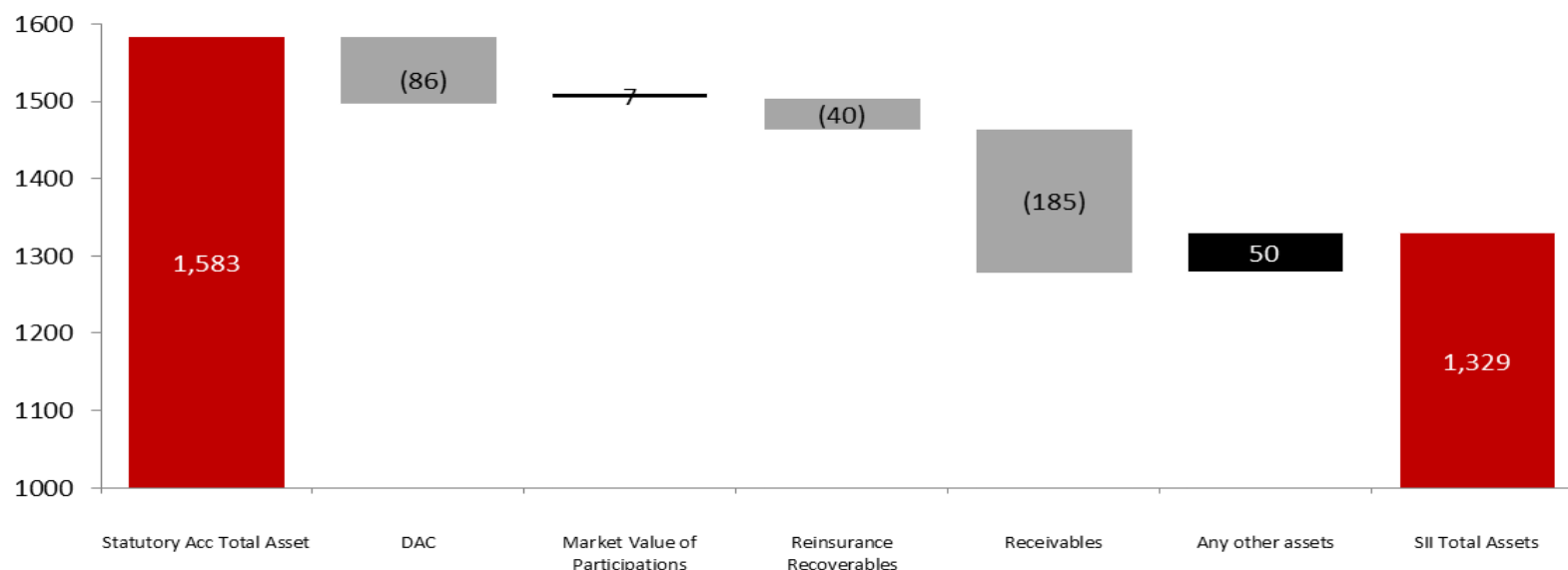
D-1 Assets

At the end of 2019, Atradius Re had assets with a total value of EUR 1,329 million under Solvency II (EUR 1,583 million under Irish GAAP).

The following shows the differences by asset category:

All amounts in thousands of Euro, unless otherwise stated			
	FY19	FY19	
Assets	Solvency 2	Stat. Acc. (Irish GAAP)	Difference
Goodwill and other Intangible assets	0	9	(9)
Property, plant and equipment for own use	57	57	0
Financial investments	1,054,779	1,047,566	7,213
Reinsurance recoverables technical provisions	50,300	90,386	(40,086)
Deposits to cedants	41,893	41,893	0
Receivables (insurance, intermediaries and trade)	11,983	196,707	(184,724)
Deferred acquisition costs	0	86,039	(86,039)
Deferred income tax assets	0	176	(176)
Cash and cash equivalents	110,552	109,923	629
Any other assets (miscellaneous, accruals, current tax)	59,714	9,980	49,734
Total	1,329,278	1,582,736	(253,458)

The following graph shows the assets bridge between statutory accounts and SII.



- **Financial investments:** In the Solvency II balance sheet and in the financial statements, all financial investments are valued at fair value. However, in the Solvency II balance sheet, accrued interest is also included as part of the financial investments, whereas in the financial statements it is part of the

accruals in other assets i.e. a reclassification difference only.

- **Reinsurance recoverables:** in the Solvency II economic balance sheet, these are valued in accordance with the valuation criteria of the Solvency II provisions (see section D.2) and taking into account the probability of default of the reinsurers.

- **Deferred acquisition costs:** The Solvency II economic value of deferred acquisition costs is Nil. (EUR 86.0 million under Irish GAAP).
- **Deferred taxes:** Due to the various differences in the accounting policies applied in the Solvency II balance sheet and the financial statements of the Company, differences also arise in the

deferred income tax positions (e.g. due to the risk margin and the different bases of valuations of the best estimate liabilities).

- **Cash and cash equivalents:** There are no differences between the Solvency II valuation and the valuation of cash in the financial statements, with any differences being reclassifications only.
- **Receivables:** In the financial statements, receivables in respect of future (pipeline) premium (incl. excess of loss) are included here. For Solvency II purposes, these amounts are considered as part of the best estimate liabilities.
- **Any other assets:** In the financial statements, the advance (unearned) reinsurance premium for future periods that has been received for short-term credit (re)insurance is recorded as part of the technical provisions. In the

Solvency II balance sheet, the ceded part of the short term credit (re)insurance forms part of the any other assets balance.

D-2 Technical provisions

Valuation Principles

As prescribed by the Solvency II Directive (DIR), the technical provisions are made up of three components:

- **Provisions for claims outstanding (PCO):** The PCO is the best estimate of cash flows relating to claim events that have already occurred, regardless of whether the claims arising from those events have been reported or not.
- **Premium provisions (PP):** The PP is the best estimate relating to future claim events covered by insurance and reinsurance obligations falling within the contract boundary. Cash

flow projections for the calculation of the PP include claims, expenses and premiums.

- **Risk margin (RM):** The RM is intended to be the amount of capital that another (re)insurer taking on the liabilities at the valuation date would require over and above the best estimate. It is calculated using a cost-of-capital approach as prescribed within the Solvency II Directive.

For the purposes of this report, the best estimate, unless otherwise specified is gross, without deduction of the amounts recoverable from reinsurance contracts.

The calculation of the technical provisions includes cash flows associated with existing contracts, for obligations up to the contract boundary.

For all products the best estimate is determined by relevant actuarial and statistical methods in combination with realistic assumptions.

The main assumptions underlying the Solvency II technical provision calculation relate to premium and loss ratio estimates, claims occurrence and prudence.

The methods used and the choice of loss occurrence definition determines the split between PCO and PP. This methodology is specific to the different products within the Company's business.

Choice of contract boundary

The Company has chosen the following contract boundaries, which are specified by product.

Product	Contract Boundary
Credit Insurance	Risk insured before balance sheet date.
Special Products	All policies issued before balance sheet date that have not expired.
Bonding	Bonds issues before balance sheet date including extensions.
Instalment Credit Protection	End of the underlying credit obligation for all policies issued before the balance sheet date.
Inward Reinsurance	All treaties considered bound before the balance sheet date.

Valuation methodologies

The Solvency II best estimate is valued using methodologies consistent with principles and bases used for financial reporting.

A short description of the methodologies used to determine provisions by product is provided below.

- Traditional credit insurance: provisions are calculated based on statistical methods. These are used to project claim counts for each month of risk taken on and an average claim severity to estimate ultimate claim cost. For large cases,

individual assessments of provisions are made. In addition, reserves are carried for future large losses and losses resulting from reporting on specific events.

- Special Products: provisions for reported claims are calculated on a case by case basis. Provisions for future claims are based on an expected premium / expected loss ratio approach
- Bonding: provisions for reported claims are calculated on a case-by-case basis. Provisions for future claims are based on an expected premium / expected loss ratio approach.
- ICP: claims reserves for reported but not settled claims are determined on a case by case basis. Salvage

and subrogation dominate the ICP provisions due to the nature of the product: claims paid are in the order of three times premium. Claims paid are typically recovered in full over a period of over ten years. Provisions for salvage and subrogation for ICP are estimated using a chain ladder method.

- Inward Reinsurance: provisions are calculated based on statistical methods projecting estimated loss ratios and premium estimates.

Future premiums are estimated based on methods that project premiums to be received in the future at a policy or treaty level.

For all products the best estimate is determined by relevant actuarial methods in combination with realistic assumptions.

There are no future management actions assumed in the calculation of the

Company's gross of reinsurance best estimate liabilities. The valuation of reinsurance recoverables assumes that future reinsurance contracts will be in line with the most recent outward reinsurance treaties in place.

Reinsurance recoverables

Atradius Re business' reinsurance protection derives from its reinsurance programme. The main programme consists an Excess of Loss (XOL) programme. There are also a number of quota share retrocession agreements on individual treaties.

The amounts recoverable from reinsurance contracts are estimated consistently within the boundaries of the underlying contracts to which they relate. Reinsurance recoverables are calculated directly, treaty by treaty, without approximation.

An adjustment for expected losses due to counterparty default is included in the estimate of reinsurance recoverables. The

reinsurance panel predominantly has an S&P rating of A- or better.

Risk margin

The Risk margin is defined as the cost needed to cover all future capital requirements until the final settlement of existing business.

The Solvency Capital Requirement (SCR) is the risk capital required for one year only. Hence the SCR for individual points of time in the future needs to be estimated.

The Company follows the general guidance given under Method 1 within the EIOPA Solvency II Guideline 62 (EIOPA-BoS-14/166 EN). This assumes that the risk margin is based on a cost of capital approach for business that is considered "existing". For the cost of capital, a rate of 6% is used according to the Delegated Regulation (Article 39).

The overall approach used to calculate the risk margin is to perform a full calculation of the SCR at each future point in time using the standard formula with certain

simplifications. The simplifications are used for the counterparty default and operational risk modules.

The method used to calculate the risk margin is based on the formula below which is prescribed in DR: Article 37(1).

$$RM = CoC \cdot \sum_{t \geq 0} \frac{SCR(t)}{(1 + r(t + 1))^{t+1}}$$

Where the cost-of c-Capital (CoC) rate used is 6% as is prescribed in DR: Article 39.

SCR(t) denotes the Solvency Capital Requirement referred to in DR: Article 38(2) at year (t). It is a formula similar to that used to calculate the actual SF SCR as outlined in DIR: Article 103.

Overview of technical provisions

The following table shows the Solvency II gross and ceded technical provisions split by line of business and the risk margin as at 31 December 2019:

EUR million	Accepted proportional credit and suretyship reinsurance	Accepted non proportional credit and suretyship reinsurance	Total
Gross best estimate	349.7	1.8	351.5
Reinsurance recoveries	49.7	0.6	50.3
Net best estimate (including adjustments for CDR risk)	300.0	1.2	301.2
Risk Margin	57.2	0.8	58.0

Comparison with the financial statements

SII calculations are based on IFRS figures. The most material differences between the SII and IFRS valuations of TP are:

- Change in bases of moving from IFRS to SII, as profit is recognised on IFRS UPR; and
- Change in assumptions, for the short term credit insurance product ceded by ACyC, that determines the Solvency II best

estimate. In principle, underlying methodologies to arrive at a best estimate do not differ from current financial statements but calibrated parameters and assumptions reflect a probability weighted average.

EUR million	IFRS (*)	SII (**)
Gross Technical Provisions	720	410
Net Technical Provisions	629	359

(*) includes UPR

(**) includes Risk Margin

Comparison with the previous year

The Solvency II Best Estimate (net of reinsurance and discounted) increased by EUR 3.5 million, due mainly to lower provisions and increase in provisions to account for increase in claims frequency within the credit insurance portfolio.

No other material assumption changes were made compared to the previous reporting period

Level of Uncertainty

The frequency and severity of claims are affected by several factors. These include all factors that affect credit risk in general. Thus the status of the economy is a major driver of the frequency and severity

of claims. Its effect may vary by country and sector. For trade credit risk, the behavior of customers may also affect the frequency and severity of claims, for instance through risks inherent to their business activities and their risk management practices. Specific events (e.g. natural disasters) or structural changes in the economy (e.g. easier access to developed markets for producers in low cost countries), may impact the frequency and severity of claims. What specific events or structural changes are relevant in this respect will vary over time.

The bonding business usually incurs irrecoverable losses only when, after a bond call, any payments to beneficiaries cannot be reclaimed from the bonding customer, or its guarantors. This is almost always due to either the insolvency or bankruptcy of the bonding customer. Thus, in the end, the frequency and severity of claims is affected by similar factors as those affecting credit reinsurance.

All forms of credit reinsurance and bonding bear the risk that changes in legislation, in particular of insolvency law, may affect the amount and timing of claims payments or recoveries.

At radius Re does not apply:

- Matching adjustment referred to in Article 77b of Directive 2009/138/EC
- Volatility adjustment referred to in Article 77d of Directive 2009/138/EC
- Transitional risk-free interest rate-term structure referred to Article 308c of Directive 2009/138/EC
- Transitional deduction referred to in Article 308d of Directive 2009/138/EC

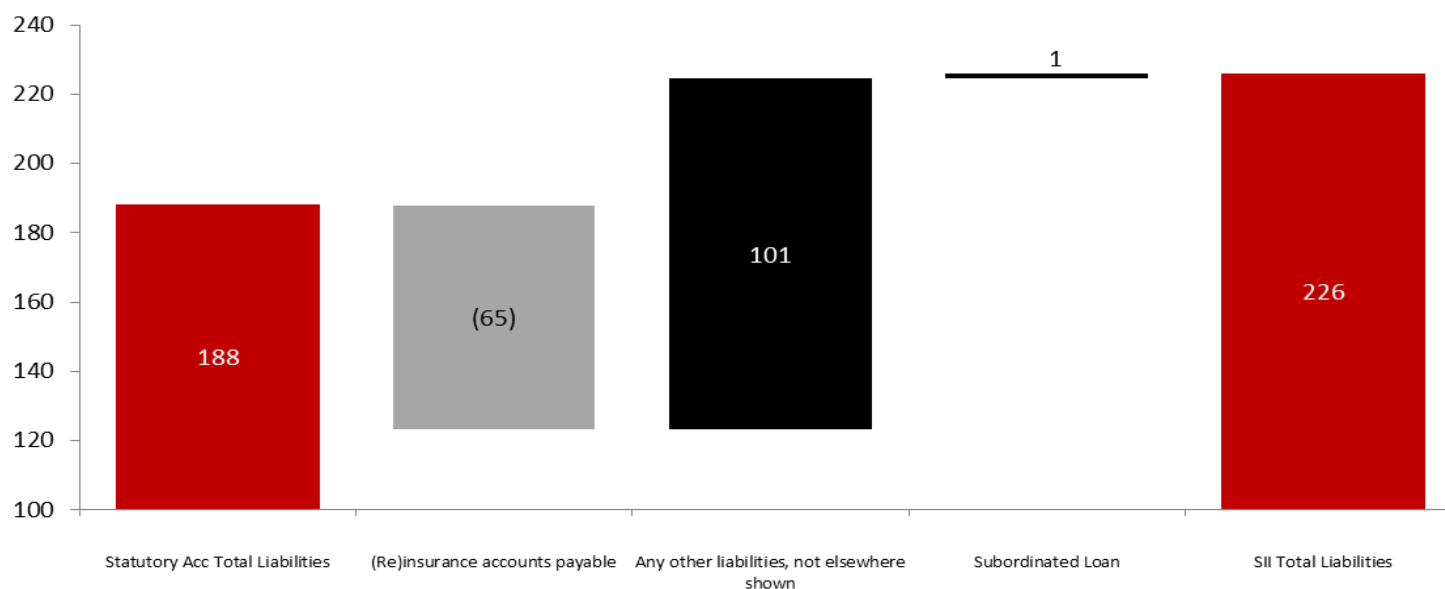
D-3 Other Liabilities

In Annex F-2, reclassification and valuation differences are shown separately. The table on the following page shows the total difference per liability category (excluding technical provisions). For explanations on these differences, please see below and for technical provisions please see D-2.

All amounts in thousands of Euro, unless otherwise stated			
Liabilities	FY19 Solvency 2	FY19 Stat. Acc. (Irish GAAP)	Difference
Cash deposits from reinsurers	42	42	0
(Re)insurance accounts payable	20,667	85,678 *	65,011
Net Deferred income tax liabilities	2,231	0	(2,231)
Payables (trade, not insurance)	4,999	4,999	0
Any other liabilities	123,889	22,438 *	(101,451)
Subordinated loan	76,381	75,000	(1,381)
Total	228,209	188,157	(40,052)

* These amounts are including reclassifications within the liabilities and therefore do not exactly reconcile with amounts shown in F.1.2 Annex II

The following graph shows the liabilities bridge between statutory accounts and SII.



- **Reinsurance accounts payable:** In the Solvency II balance sheet, accruals for future premium and reinsurance commission that relate to periods for which the Company is at risk but has not yet written the premium are part of the technical provisions (best estimate liabilities). In the statutory balance sheet in the financial statements, these items are presented separately as reinsurance accounts payable under creditors.
- **Any other liabilities:** The advance reinsurance premium (UPR) and the related ceded balances for future periods that have been received for short-term credit (re) insurance are recorded as part of the accruals in the Solvency II balance sheet. In the statutory balance sheet in the financial statements, these are part of the technical provisions.

D-4 Alternative methods for valuation

Valuation of the subordinated loan provided to Atradius Reinsurance DAC

Subordinated Loan

Part of the Company's basic own funds is a subordinated loan, treated as Tier II capital, in the nominal amount of EUR 75 million, with a group of lenders that are part of the GCO Group.

The market valuation for Solvency II of EUR 76.38 million is based on the present value of the subordinated loan's cash flows discounted using the Euro government bond yield curve as a benchmark and applying an appropriate risk spread.

The credit spread applied is estimated using the credit spreads of market quoted subordinated bond issues by similar issuers and with similar rating and maturity profiles. The fair value estimate of the bonds is provided by an external

independent valuation company, which uses its own proprietary valuation systems to value securities supported by economic and market assumptions from financial information providers.

There are no valuation techniques used on the basis of the model approach.

D-5 Other Information

No other information to be disclosed.

E. Capital Management

E-0 Introduction

E-0.1 Capital management - principles

E-0.2 Capital management - processes

E-1 Own funds

E-2 Solvency capital requirement and minimum capital requirement

E-3 Use of the duration-based equity risk sub-module in the calculation of the solvency capital requirement

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

E-5 Non-compliance with the minimum capital requirement and non-compliance with the solvency capital requirement

E-6 Any other information

E-O Capital Management – Introduction

Atradius Re seeks to maintain a strong capital position, to support the evolution of the business, withstand financial stresses, meet all financial obligations and maximise returns to our shareholders, Grupo Catalana Occidente S.A. (GCO), while protecting its customers.

E-O.1 Capital management – principles

The Company has the following guiding principles and objectives in respect of its capital management:

- Sufficient capitalisation to be able to continue as a going concern after meeting all of its financial obligations.
- To meet the externally imposed regulatory requirements based on the

EU Directive requirements of Solvency II, as an authorised reinsurer regulated by the Central Bank of Ireland (“CBI”).

- To maximise the return to our shareholders Grupo Catalana Occidente S.A. (GCO), while protecting our customers.

Available capital is managed from both an accounting and an economic perspective.

Atradius Re calculates its Solvency Capital Requirements in accordance with the solvency calculation requirements of Solvency II.

In order to ensure meeting the objective of sufficient capitalisation as described above, the Company’s policy is to maintain a capital amount above the regulatory solvency capital requirement, to ensure that large loss events would not impair the ability of the Company to carry on its normal course of business.

E-O.2 Capital management – processes

The Company has embedded processes and procedures for:

- Capital planning;
- Capital monitoring; and
- Capital management.

These processes and procedures have the objective of ensuring compliance with externally imposed regulations and internally imposed requirements for capital adequacy.

Such compliance is ensured as follows:

- regular assessment of solvency needs, taking into account the business strategy, resulting risk profile and applied risk limits.
- calculation of the capital consumption of new and existing business.

E-1 Own funds

The structure of available capital follows the regulatory requirements for quality of capital in terms of (capital) tiering and coverage limits. Under Solvency II, own funds are classified into three categories ranked Tier 1, Tier 2 and Tier 3, with Tier 1 being the highest quality. The eligible amount of basic own funds sufficiently covers the Minimum Capital Requirement.

The following table illustrates the own funds by tier for the Company as at 31 December 2019:

	Tier 1	Tier 2	Tier 3	Total
Basic Own Fund Items (EUR millions)				
Ordinary paid up share capital	0.6	-	-	0.6
Capital contributions	279.1	-	-	279.1
Other reserves from accounting balance sheet	395.0	-	-	395.0
Adjustments to assets	(253.5)	-	-	(253.5)
Adjustments to technical provisions	310.3	-	-	310.3
Adjustments to other liabilities	(39.9)	-	-	(39.9)
Subordinated liabilities dated	-	76.4	-	76.4
Total basic own funds	691.6	76.4	0.0	768.0

The following table illustrates the own funds by tier for the Company as at 31 December 2018:

	Tier 1	Tier 2	Tier 3	Total
Basic Own Fund Items (EUR millions)				
Ordinary paid up share capital	0.6	-	-	0.6
Capital contributions	279.1	-	-	279.1
Other reserves from accounting balance sheet	354.6	-	-	354.6
Net deferred tax assets	-	-	4.2	4.2
Adjustments to assets	(236.9)	-	-	(236.9)
Adjustments to technical provisions	264.7	-	-	264.7
Adjustments to other liabilities	(38.5)	-	-	(38.5)
Subordinated liabilities dated	-	78.2	-	78.2
Total basic own funds	623.6	78.2	4.2	706.0

Tier 1:

The called up share capital represents the nominal value of shares that have been issued.

The authorised share capital of the Company amounts to EUR 635,000, all of which relates to called up share capital, presented as equity, and is divided into 635,000 ordinary shares with a nominal value of EUR1 each.

The capital contribution represents capital received from our shareholders and approved as eligible Tier 1 capital by the Central Bank of Ireland.

Tier 2:

Subordinated loan provided to Atradius Reinsurance DAC

On 20 April 2016 the shareholders of Atradius N.V. provided a subordinated loan to Atradius Re with a principle amount of EUR 75 million. The loan agreement was executed on 18 April 2016 and the funds transferred on 20 April 2016.

The interest on the subordinated loan was fixed at 5.0% per annum, payable annually in arrears on 20 April each year until and including the maturity date: 20 April 2026. Atradius Re may redeem the loan on the first call date: 20th April 2021, or thereafter on each interest payment date.

The subordinated loan qualifies as a Tier 2 basic own funds item as set out in article 73 of the European Commission's Solvency II Delegated Regulation (2015/35).

Tier 3:

There is no Tier 3 capital. In the prior year, Tier 3 Capital comprised an amount equal to the value of net deferred tax assets, arising on the differences in valuations between Solvency II and those underlying the financial statements.

E-2 Solvency capital requirement and minimum capital requirement

The table on the following page shows the Solvency Capital Requirement (SCR), calculated under the approved Partial Internal Model (PIM). The calculation uses no simplified calculation, undertaking-

specific parameters, or the duration-based equity risk sub-module.

See also SCR QRT “S.25.01” in “F-1 Annexes all relevant QRTs”.

The solvency coverage ratio (ratio of eligible own funds to the SCR) at 31 December 2019 was 179.9% (2018: 175.3%).

The tax adjustment in the SCR calculation is referenced in Section E6 (Any Other Information)

The ratio of eligible own funds to the Minimum Capital Requirement (MCR) at 31 December 2019 was 668% (2018: 611.3%).

Market Risk:	FY19	FY18
Interest Rate Risk	9	6
Equity Risk	29	18
Spread Risk	26	16
Currency Risk	23	23
Concentration Risk	6	3
Total undiversified	93	66
Diversification	(29)	(20)
Total diversified	64	46
Non-Life UW Risk:		
Internal Model	410	395
Premium and Reserve Risk	2	2
Catastrophe Risk		
CAT recession scenario	2	2
CAT default scenario	-	-
CAT other scenario	-	-
Total undiversified	2	2
Diversification	-	-
Total diversified	2	2
Lapse Risk	-	-
Total undiversified	414	399
Diversification	(1)	(1)
Total diversified	413	398
Counterparty risk	14	12
BSCR:		
Total undiversified	491	456
Diversification	(50)	(38)
Total diversified	441	418
Operational Risk	16	15
SCR		
Total before tax adjustment:	457	433
Tax adjustment	(30)	(30)
Solvency Capital Requirement	427	403
MCR	107	106
Eligible own funds	768	706
SCR Coverage ratio	180%	175%

E-3 Use of the duration-based equity risk sub-module in the calculation of the solvency capital requirement

n/a

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

For the purpose of adapting the solvency requirements to the risk profile of each company, the Solvency II regulations enable institutions to calculate solvency capital requirements using internally developed risk models.

As part of the Atradius Group, Atradius Re has been modelling its capital requirements for many years on the basis of an economic capital model prior to the introduction of Solvency II. As this model reflects the business model of Atradius Re and its risk profile, the Company has continued to use it by working closely with the Atradius Group to adapt it to make it Solvency II compliant. This internal model has received regulatory approval and is used for the calculation of its capital requirements in respect of underwriting risk.

The internal model better reflects our business model and risk profile for the following reasons:

- it simulates the state of the economy;
- it accounts for risk mitigation measures the Company has in place e.g. reinsurance;
- it uses the same ratings and probability of defaults (PDs) in use by the Company;
- it accounts for concentration risk and the correlations between risks;
- it accounts for “dynamic exposure management” unique to credit (re)insurance: it is possible to cut limits/manage exposures;
- the standard formula is not appropriate for credit (re)insurance as underwriting risk is split into premium and catastrophe risk, which in essence is a double counting of risks e.g. a recession is not a catastrophe for credit (re)insurance as it is already

covered by premium and reserve risk;

- we have several lines of credit (re)insurance with different risk profiles not reflected by the standard formula.

The internal model, specific for underwriting risk, is a simulation model based on the Monte Carlo technique in a time horizon of one year and with a confidence level of 99.5%. Through it risks are allocated specific likelihoods of bankruptcy and a loss in the event of default, and the final distribution of losses is constructed that allows us to accurately determine the SCR.

E-5 Non-compliance with the minimum capital requirement and non-compliance with the solvency capital requirement

There is no unforeseeable risk of non-compliance with Atradius Re’s Minimum Capital Requirement or Solvency Capital Requirement. The risk profile and solvency positions are monitored continuously and in case of an increase of

the risk of a capital shortfall, management will take appropriate action.

E-6 Any other information

Tax adjustment in SCR calculation

The tax adjustment that reduces the solvency capital requirement refers to the loss absorbing capacity of deferred taxes

(LACDT). The tax adjustment at 31 December 2019 was EUR 30 million (2018: EUR 30 million), representing 6.6% (2018: 6.9%) of the basic SCR (BSCR) plus operational risk (BSCR + Oprisk) of EUR 457 million (2018: EUR 433 million) before the tax adjustment.

When calculating the solvency capital requirement, it is assumed that in the event of a shock event for which the

magnitude of the SCR is required, in accordance with tax rules the consequent losses will be available on a 'continuing going concern' basis to offset against future taxable income. The tax losses to be offset are limited to the lower of the (tax) losses and the future stressed taxable profits against which the losses can be offset.

F. Annexes

F-1 All relevant QRTs

F-2 Detailed reconciliation of the balance sheet in accordance with the financial statements and Solvency II

F-3 Solvency II valuation principles

F-1 All relevant QRTs

- SE.02.01 Balance sheet
- S.05.01 Premiums, claims and expenses by line of business
- S.05.02 Premiums, claims and expenses by country
- S.17.01 Non-life technical provisions
- S.25.02 Solvency capital requirement for undertakings using the standard formula and the partial internal model
- S.28.01 Minimum capital requirement – only life or only non-life insurance or reinsurance activity
- S.23.01 Own funds
- S.19.01 Non-life insurance claims

SE.02.01.02
Balance sheet

		Solvency II value
		C0010
Assets		
Goodwill	R0010	0.00
Deferred acquisition costs	R0020	0.00
Intangible assets	R0030	0.00
Deferred tax assets	R0040	0.00
Pension benefit surplus	R0050	0.00
Property, plant & equipment held for own use	R0060	57,480.72
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	1,054,779,329.64
Property (other than for own use)	R0080	0.00
Holdings in related undertakings, including participations	R0090	0.00
Equities	R0100	66,569,140.28
Equities - listed	R0110	66,569,140.28
Equities - unlisted	R0120	0.00
Bonds	R0130	959,871,581.79
Government Bonds	R0140	323,860,936.07
Corporate Bonds	R0150	636,010,645.72
Structured notes	R0160	0.00
Collateralised securities	R0170	0.00
Collective Investments Undertakings	R0180	28,338,607.57
Derivatives	R0190	0.00
Deposits other than cash equivalents	R0200	0.00
Other investments	R0210	0.00
Assets held for index-linked and unit-linked contracts	R0220	0.00
Loans and mortgages	R0230	0.00
Loans on policies	R0240	0.00
Loans and mortgages to individuals	R0250	0.00
Other loans and mortgages	R0260	0.00
Reinsurance recoverables from:	R0270	50,300,273.00
Non-life and health similar to non-life	R0280	50,300,273.00
Non-life excluding health	R0290	50,300,273.00
Health similar to non-life	R0300	0.00
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	0.00
Health similar to life	R0320	0.00
Life excluding health and index-linked and unit-linked	R0330	0.00
Life index-linked and unit-linked	R0340	0.00
Deposits to cedants	R0350	41,892,985.52
Insurance and intermediaries receivables	R0360	11,074,989.12
Reinsurance receivables	R0370	0.00
Receivables (trade, not insurance)	R0380	907,808.90
Own shares (held directly)	R0390	0.00
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	0.00
Cash and cash equivalents	R0410	110,551,540.01
Any other assets, not elsewhere shown	R0420	59,713,710.34
Total assets	R0500	1,329,278,117.25

Liabilities		
Technical provisions – non-life	R0510	409,535,977.00
Technical provisions – non-life (excluding health)	R0520	409,535,977.00
Technical provisions calculated as a whole	R0530	0.00
Best Estimate	R0540	351,546,158.00
Risk margin	R0550	57,989,819.00
Technical provisions - health (similar to non-life)	R0560	0.00
Technical provisions calculated as a whole	R0570	0.00
Best Estimate	R0580	0.00
Risk margin	R0590	0.00
Technical provisions - life (excluding index-linked and unit-linked)	R0600	0.00
Technical provisions - health (similar to life)	R0610	0.00
Technical provisions calculated as a whole	R0620	0.00
Best Estimate	R0630	0.00
Risk margin	R0640	0.00
Technical provisions – life (excluding health and index-linked and unit-linked)	R0650	0.00
Technical provisions calculated as a whole	R0660	0.00
Best Estimate	R0670	0.00
Risk margin	R0680	0.00
Technical provisions – index-linked and unit-linked	R0690	0.00
Technical provisions calculated as a whole	R0700	0.00
Best Estimate	R0710	0.00
Risk margin	R0720	0.00
Other technical provisions	R0730	0.00
Contingent liabilities	R0740	0.00
Provisions other than technical provisions	R0750	0.00
Pension benefit obligations	R0760	0.00
Deposits from reinsurers	R0770	42,079.28
Deferred tax liabilities	R0780	2,231,439.70
Derivatives	R0790	0.00
Debts owed to credit institutions	R0800	0.00
Debts owed to credit institutions resident domestically	ER0801	0.00
Debts owed to credit institutions resident in the euro area other than domestic	ER0802	0.00
Debts owed to credit institutions resident in rest of the world	ER0803	0.00
Financial liabilities other than debts owed to credit institutions	R0810	0.00
Debts owed to non-credit institutions	ER0811	0.00
Debts owed to non-credit institutions resident domestically	ER0812	0.00
Debts owed to non-credit institutions resident in the euro area other than domestic	ER0813	0.00
Debts owed to non-credit institutions resident in rest of the world	ER0814	0.00
Other financial liabilities (debt securities issued)	ER0815	0.00
Insurance & intermediaries payables	R0820	17,345,379.43
Reinsurance payables	R0830	3,321,524.81
Payables (trade, not insurance)	R0840	4,998,872.87
Subordinated liabilities	R0850	76,380,835.00
Subordinated liabilities not in Basic Own Funds	R0860	0.00
Subordinated liabilities in Basic Own Funds	R0870	76,380,835.00
Any other liabilities, not elsewhere shown	R0880	123,889,072.19
Total liabilities	R0900	637,745,180.28
Excess of assets over liabilities	R1000	691,532,936.97

S.05.01.02

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

		Line of Business for: non-life	Line of Business for: accepted	Total
		Credit and suretyship insurance	Property	
		C0090	C0160	C0200
Premiums written				
Gross - Direct Business	R0110			
Gross - Proportional reinsurance accepted	R0120	534,699,036.68		534,699,036.68
Gross - Non-proportional reinsurance accepted	R0130		6,581,677.95	6,581,677.95
Reinsurers' share	R0140	58,895,285.09	764,378.92	59,659,664.01
Net	R0200	475,803,751.59	5,817,299.03	481,621,050.62
Premiums earned				
Gross - Direct Business	R0210			
Gross - Proportional reinsurance accepted	R0220	507,653,974.42		507,653,974.42
Gross - Non-proportional reinsurance accepted	R0230		6,575,634.08	6,575,634.08
Reinsurers' share	R0240	56,971,925.20	766,116.63	57,738,041.83
Net	R0300	450,682,049.22	5,809,517.45	456,491,566.67
Claims incurred				
Gross - Direct Business	R0310			
Gross - Proportional reinsurance accepted	R0320	234,941,100.14		234,941,100.14
Gross - Non-proportional reinsurance accepted	R0330		5,332,008.98	5,332,008.98
Reinsurers' share	R0340	25,556,172.67	839,750.64	26,395,923.31
Net	R0400	209,384,927.47	4,492,258.34	213,877,185.81
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	219,385,287.81	647,973.25	220,033,261.06
Administrative expenses				
Gross - Direct Business	R0610			
Gross - Proportional reinsurance accepted	R0620	9,344,241.00		9,344,241.00
Gross - Non-proportional reinsurance accepted	R0630		267,874.84	267,874.84
Reinsurers' share	R0640			
Net	R0700	9,344,241.00	267,874.84	9,612,115.84
Investment management expenses				
Gross - Direct Business	R0710			
Gross - Proportional reinsurance accepted	R0720	1,282,216.73		1,282,216.73
Gross - Non-proportional reinsurance accepted	R0730		15,760.00	15,760.00
Reinsurers' share	R0740			
Net	R0800	1,282,216.73	15,760.00	1,297,976.73
Claims management expenses				
Gross - Direct Business	R0810			
Gross - Proportional reinsurance accepted	R0820	544,138.88		544,138.88
Gross - Non-proportional reinsurance accepted	R0830			
Reinsurers' share	R0840			
Net	R0900	544,138.88		544,138.88
Acquisition expenses				
Gross - Direct Business	R0910			
Gross - Proportional reinsurance accepted	R0920	228,726,471.20		228,726,471.20
Gross - Non-proportional reinsurance accepted	R0930		429,339.04	429,339.04
Reinsurers' share	R0940	20,511,780.00	65,000.63	20,576,780.63
Net	R1000	208,214,691.20	364,338.41	208,579,029.61
Overhead expenses				
Gross - Direct Business	R1010			
Gross - Proportional reinsurance accepted	R1020			
Gross - Non-proportional reinsurance accepted	R1030			
Reinsurers' share	R1040			
Net	R1100			
Other expenses	R1200			
Total expenses	R1300			220,033,261.06

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	C0010	Spain	Brazil	China	Russian Federation	United States	C0070
		C0080	C0090	C0100	C0110	C0120	C0130	C0140
Premiums written								
Gross - Direct Business	R0110							
Gross - Proportional reinsurance accepted	R0120	347,522.99	319,841,447.50	26,681,196.12	41,930,852.57	28,869,125.63	21,860,427.44	439,530,572.25
Gross - Non-proportional reinsurance accepted	R0130	0.00	106,273.76	959,916.62	1,153,683.66	287,221.97	0.00	2,507,096.01
Reinsurers' share	R0140	0.00	2,219,061.72	9,573,821.72	22,348,194.24	12,641,712.09	2,698,855.58	49,481,645.35
Net	R0200	347,522.99	317,728,659.54	18,067,291.02	20,736,341.99	16,514,635.51	19,161,571.86	392,556,022.91
Premiums earned								
Gross - Direct Business	R0210							
Gross - Proportional reinsurance accepted	R0220	242,221.81	299,741,063.30	24,178,985.09	38,234,426.01	26,760,068.12	22,382,364.39	411,539,128.72
Gross - Non-proportional reinsurance accepted	R0230	0.00	106,273.76	918,367.33	1,153,683.66	287,221.97	0.00	2,465,546.72
Reinsurers' share	R0240	0.00	2,344,251.08	8,852,947.40	22,236,126.88	10,566,212.97	2,701,858.47	46,701,396.80
Net	R0300	242,221.81	297,503,085.98	16,244,405.02	17,151,982.79	16,481,077.12	19,680,505.92	367,303,278.64
Claims incurred								
Gross - Direct Business	R0310	0.00						
Gross - Proportional reinsurance accepted	R0320	121,110.93	136,132,469.00	8,319,398.48	23,161,810.28	9,492,388.48	8,151,191.16	185,378,368.33
Gross - Non-proportional reinsurance accepted	R0330	0.00	347,377.96	857,023.65	1,150,124.50	20,831.60		2,375,357.71
Reinsurers' share	R0340	0.00	(5,608,229.31)	778,860.08	15,642,755.07	5,198,510.95	470,793.58	16,482,690.37
Net	R0400	121,110.93	142,088,076.27	8,397,562.05	8,669,179.71	4,314,709.13	7,680,397.58	171,271,035.67
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	79,407.93	143,040,540.50	7,261,335.47	4,503,143.33	4,983,652.85	9,985,443.51	169,853,523.59
Other expenses	R1200							
Total expenses	R1300							169,853,523.59

S.17.01.02

Non-Life Technical Provisions

		Direct business and accepted proportional reinsurance	Accepted non-proportional reinsurance	Total Non-Life obligation
		Credit and suretyship insurance	Non-proportional property reinsurance	
		C0100	C0170	C0180
Technical provisions calculated as a whole	R0010			
Direct business	R0020			
Accepted proportional reinsurance business	R0030			
Accepted non-proportional reinsurance	R0040			
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole	R0050			
Technical provisions calculated as a sum of BE and RM				
Best estimate				
Premium provisions				
Gross - Total	R0060	58,131,796.12	-5,247,470.55	52,884,325.57
Gross - direct business	R0070			
Gross - accepted proportional reinsurance business	R0080	58,131,796.12		58,131,796.12
Gross - accepted non-proportional reinsurance business	R0090		5,247,470.55	-5,247,470.55
Total recoverable from reinsurance/SPV and Finite Re before the adjustment for expected losses due to counterparty default	R0100	6,335,042.46	-181,280.44	6,153,762.02
Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses	R0110	6,335,042.46	-181,280.44	6,153,762.02
Recoverables from SPV before adjustment for expected losses	R0120			
Recoverables from Finite Reinsurance before adjustment for expected losses	R0130			
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140	6,304,154.11	-180,726.95	6,123,427.16
Net Best Estimate of Premium Provisions	R0150	51,827,642.01	-5,066,743.60	46,760,898.41
Claims provisions				
Gross - Total	R0160	291,559,712.07	7,102,120.36	298,661,832.43
Gross - direct business	R0170			
Gross - accepted proportional reinsurance business	R0180	291,559,712.07		291,559,712.07
Gross - accepted non-proportional reinsurance business	R0190		7,102,120.36	7,102,120.36
Total recoverable from reinsurance/SPV and Finite Re before the adjustment for expected losses due to counterparty default	R0200	43,873,893.92	815,489.39	44,689,383.31
Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses	R0210	43,873,893.92	815,489.39	44,689,383.31
Recoverables from SPV before adjustment for expected losses	R0220			
Recoverables from Finite Reinsurance before adjustment for expected losses	R0230			
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240	43,370,868.89	805,976.34	44,176,845.23
Net Best Estimate of Claims Provisions	R0250	248,188,843.18	6,296,144.02	254,484,987.21
Total Best estimate - gross	R0260	349,691,508.19	1,854,649.81	351,546,158.00
Total Best estimate - net	R0270	300,016,485.20	1,229,400.42	301,245,885.62
Risk margin	R0280	57,239,489.30	750,329.70	57,989,819.00
Amount of the transitional on Technical Provisions				
TP as a whole	R0290			
Best estimate	R0300			
Risk margin	R0310			
Technical provisions - total				
Technical provisions - total	R0320	406,930,997.49	2,604,979.51	409,535,977.00
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	R0330	49,675,023.00	625,249.39	50,300,272.39
Technical provisions minus recoverables from reinsurance/SPV and Finite Re- total	R0340	357,255,974.49	1,979,730.12	359,235,704.61
Line of Business: further segmentation (Homogeneous Risk Groups)				
Premium provisions - Total number of homogeneous risk groups	R0350	28	3	
Claims provisions - Total number of homogeneous risk groups	R0360	28	4	
Cash-flows of the Best estimate of Premium Provisions (Gross)				
Cash out-flows				
Future benefits and claims	R0370	256,963,477.65	533,349.05	257,496,826.70
Future expenses and other cash-out flows	R0380	45,115,060.66	454,753.47	45,569,814.13
Cash in-flows				
Future premiums	R0390	215,112,174.12	5,973,041.40	221,085,215.51
Other cash-in flows (incl. Recoverable from salvages and subrogations)	R0400	28,834,568.07	262,531.67	29,097,099.74
Cash-flows of the Best estimate of Claims Provisions (Gross)				
Cash out-flows				
Future benefits and claims	R0410	374,603,565.32	8,205,374.06	382,808,939.37
Future expenses and other cash-out flows	R0420	14,849,916.83	62,211.56	14,912,128.40
Cash in-flows				
Future premiums	R0430	916,631.65		916,631.65
Other cash-in flows (incl. Recoverable from salvages and subrogations)	R0440	96,977,138.43	1,165,465.27	98,142,603.70
Percentage of gross Best Estimate calculated using approximations	R0450			
Best estimate subject to transitional of the interest rate	R0460			
Technical provisions without transitional on interest rate	R0470			
Best estimate subject to volatility adjustment	R0480			
Technical provisions without volatility adjustment and without others transitional measures	R0490			

S.25.02.21

Solvency Capital Requirement - for undertakings using the standard formula and the partial internal model

S.25.02.21.01

Component-specific information

Unique number of component	Components Description	Calculation of the Solvency Capital Requirement	Allocation from adjustments due to RFF and Matching adjustments portfolios	Consideration of the future management actions regarding technical provisions and/or deferred taxes	Amount modelled
C0010	C0020	C0030	C0050	C0060	C0070
1	Market Risk	63,835,117.77	0	No embedded consideration of future management actions	0.00
2	Counterparty default risk	13,661,789.29	0	No embedded consideration of future management actions	0.00
3	Life underwriting risk	0.00	0	No embedded consideration of future management actions	0.00
4	Health Underwriting risk	0.00	0	No embedded consideration of future management actions	0.00
5	Non-life underwriting risk	413,330,663.34	0	No embedded consideration of future management actions	409,996,974.04
7	Operational risk	15,565,033.44	0	No embedded consideration of future management actions	0.00
8	LAC Technical Provisions	0.00	0	No embedded consideration of future management actions	0.00
9	LAC Deferred Taxes	-29,587,063.25	0	No embedded consideration of future management actions	0.00

S.25.02.21.02**Calculation of Solvency Capital Requirement**

		C0100
Total undiversified components	R0110	476,805,540.59
Diversification	R0060	-49,943,008.20
Adjustment due to RFF/MAP nSCR aggregation	R0120	
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	
Solvency capital requirement excluding capital add-on	R0200	426,862,532.39
Capital add-ons already set	R0210	
Solvency capital requirement	R0220	426,862,532.39
Other information on SCR		
Amount/estimate of the overall loss-absorbing capacity of technical provisions	R0300	
Amount/estimate of the overall loss-absorbing capacity of deferred taxes	R0310	-29,587,063.25
Capital requirement for duration-based equity risk sub-module	R0400	
Total amount of Notional Solvency Capital Requirements for remaining part	R0410	
Total amount of Notional Solvency Capital Requirement 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	
Method used to calculate the adjustment due to RFF/MAP nSCR aggregation	R0450	
Net future discretionary benefits	R0460	

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

S.28.01.01.01

Linear formula component for non-life insurance and reinsurance obligations

		MCR components
		C0010
MCRNL Result	R0010	105,979,411.97

S.28.01.01.02

Background information

		Background information	
		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		
Credit and suretyship insurance and proportional reinsurance	R0100	300,016,485.19	457,103,261.48
Legal expenses insurance and proportional reinsurance	R0110		
Assistance and proportional reinsurance	R0120		
Miscellaneous financial loss insurance and proportional reinsurance	R0130		
Non-proportional health reinsurance	R0140		
Non-proportional casualty reinsurance	R0150		
Non-proportional marine, aviation and transport reinsurance	R0160		
Non-proportional property reinsurance	R0170	1,229,400.42	6,258,846.00

S.28.01.01.05

Overall MCR calculation

		C0070
Linear MCR	R0300	105,979,411.97
SCR	R0310	426,862,532.39
MCR cap	R0320	192,088,139.58
MCR floor	R0330	106,715,633.10
Combined MCR	R0340	106,715,633.10
Absolute floor of the MCR	R0350	3,600,000.00
Minimum Capital Requirement	R0400	106,715,633.10

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 2015/35						
Ordinary share capital (gross of own shares)	R0010	635,000.00	635,000.00			
Share premium account related to ordinary share capital	R0030					
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040					
Subordinated mutual member accounts	R0050					
Surplus funds	R0070					
Preference shares	R0090					
Share premium account related to preference shares	R0110					
Reconciliation reserve	R0130	411,843,926.18	411,843,926.18			
Subordinated liabilities	R0140	76,380,835.00			76,380,835.00	
An amount equal to the value of net deferred tax assets	R0160					
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180	279,054,010.79	279,054,010.79			
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	767,913,771.97	691,532,936.97		76,380,835.00	
Total ancillary own funds	R0400					
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	767,913,771.97	691,532,936.97		76,380,835.00	
Total available own funds to meet the MCR	R0510	767,913,771.97	691,532,936.97		76,380,835.00	
Total eligible own funds to meet the SCR	R0540	767,913,771.97	691,532,936.97		76,380,835.00	
Total eligible own funds to meet the MCR	R0550	712,876,063.59	691,532,936.97		21,343,126.62	
SCR	R0580	426,862,532.39				
MCR	R0600	106,715,633.10				
Ratio of Eligible own funds to SCR	R0620	179.90%				
Ratio of Eligible own funds to MCR	R0640	668.01%				

S.23.01.02**Reconciliation Reserve**

		C0060
Reconciliation reserve		
Excess of assets over liabilities	R0700	691,532,936.97
Own shares (held directly and indirectly)	R0710	
Foreseeable dividends, distributions and charges	R0720	
Other basic own fund items	R0730	279,689,010.79
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	
Reconciliation reserve	R0760	411,843,926.18
Expected profits		
Expected profits included in future premiums (EPIFP) - Life business	R0770	
Expected profits included in future premiums (EPIFP) - Non-life business	R0780	22,015,144.66
Total Expected profits included in future premiums (EPIFP)	R0790	22,015,144.66

S.19.01.21.01

Non life insurance claims

S.19.01.21.01

Gross Claims Paid (non-cumulative) - Development year (absolute amount). Total Non-Life Business

		Accident year / Underwriting year	0	1	2	3	4	5	6	7	8	9	10 & +		In Current year	Sum of years (cumulative)
COLUMN_AXIS	ORD_Y	20020	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110		C0170	C0180
Prior	R0100	Underwriting year [UWY]											1,115,813.93	R0100	1,115,813.93	1,115,813.93
N-9	R0160	Underwriting year [UWY]	15,043,099.37	44,682,545.86	20,792,283.59	10,887,583.96	4,917,546.45	4,391,426.11	1,943,212.39	-185,708.96	-672,150.52	-310,046.14		R0160	-310,046.14	101,489,792.11
N-8	R0170	Underwriting year [UWY]	24,297,576.98	74,917,221.57	30,832,248.30	11,824,181.11	1,298,491.19	1,268,101.19	3,617,604.03	267,300.85	1,801,390.38			R0170	1,801,390.38	150,124,115.60
N-7	R0180	Underwriting year [UWY]	35,390,422.03	85,627,950.33	36,690,036.49	15,868,049.47	5,953,125.40	1,622,125.59	898,679.39	2,344,996.36				R0180	2,344,996.36	184,395,385.07
N-6	R0190	Underwriting year [UWY]	40,645,943.18	77,600,421.66	22,836,037.20	12,973,562.12	4,310,670.52	4,292,479.47	2,309,050.57					R0190	2,309,050.57	164,968,164.72
N-5	R0200	Underwriting year [UWY]	43,587,671.06	114,528,477.98	51,175,256.57	15,289,147.99	9,911,957.74	3,539,138.63						R0200	3,539,138.63	238,031,649.98
N-4	R0210	Underwriting year [UWY]	40,314,293.54	124,336,842.02	36,221,116.24	9,820,817.42	3,966,902.04							R0210	3,966,902.04	214,659,971.26
N-3	R0220	Underwriting year [UWY]	51,701,237.53	92,228,367.41	33,057,955.24	10,093,269.18								R0220	10,093,269.18	187,080,829.36
N-2	R0230	Underwriting year [UWY]	52,007,161.15	101,151,546.66	29,928,795.32									R0230	29,928,795.32	183,087,503.13
N-1	R0240	Underwriting year [UWY]	45,948,739.03	124,077,686.81										R0240	124,077,686.81	170,026,425.84
N	R0250	Underwriting year [UWY]	46,179,666.52											R0250	46,179,666.52	46,179,666.52
														R0260	225,046,663.60	1,641,159,317.52

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Gross undiscounted Best Estimate Claims Provisions - Development year (absolute amount). Total Non-Life Business

		Accident year / Underwriting year	0	1	2	3	4	5	6	7	8	9	10 & +		Year end (discounted data)
COLUMN_AXIS	ORD_Y	20020	C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300		C0360
Prior	R0100	Underwriting year [UWY]		0.00	0.00	0.00	0.00	0.00	0.00	9,684,967.67	17,415,476.62	28,001,160.16	33,644,879.55	R0100	32,893,972.17
N-9	R0160	Underwriting year [UWY]	0.00	0.00	0.00	0.00	0.00	0.00	9,131,158.23	7,779,644.69	7,982,567.98	5,957,688.03		R0160	5,772,968.98
N-8	R0170	Underwriting year [UWY]	0.00	0.00	0.00	0.00	0.00	17,725,646.53	13,628,429.24	12,923,823.40	8,274,519.08			R0170	7,802,682.04
N-7	R0180	Underwriting year [UWY]	0.00	0.00	0.00	0.00	23,413,344.44	27,582,402.02	29,060,383.58	29,505,804.65				R0180	27,597,161.97
N-6	R0190	Underwriting year [UWY]	0.00	0.00	0.00	22,773,458.93	19,687,717.53	16,127,627.39	28,166,786.96					R0190	12,540,614.54
N-5	R0200	Underwriting year [UWY]	0.00	0.00	56,154,478.67	49,250,791.47	37,797,897.86	19,926,780.15						R0200	18,318,979.83
N-4	R0210	Underwriting year [UWY]	0.00	66,380,714.41	38,999,165.12	32,268,642.76	20,040,777.71							R0210	18,247,876.57
N-3	R0220	Underwriting year [UWY]	54,619,075.00	44,075,220.66	27,790,075.75	18,542,711.17								R0220	16,340,392.13
N-2	R0230	Underwriting year [UWY]	56,396,279.04	53,219,196.25	28,151,814.60									R0230	27,079,675.37
N-1	R0240	Underwriting year [UWY]	72,753,030.51	53,113,127.34										R0240	52,150,224.60
N	R0250	Underwriting year [UWY]	80,904,180.33											R0250	79,917,284.23
														R0260	298,661,832.43

F-2: Detailed reconciliation of the balance sheet in accordance with the financial statements and Solvency II

Amounts x € 1,000	Statutory Accounts (Irish GAAP)	Reclassification Differences	Valuation Differences	Notes	Solvency II
Goodwill	-	-	-	-	-
Other intangible assets	9	-	(9)	-	-
Goodwill & Other intangible assets	-	-	-	-	-
Property, Plant & Equipment	9	57	-	-	57
Property (other than own use)	-	-	-	-	-
Participations	-	-	-	-	-
Other financial investments	1,046,938	7,840	-	-	1,054,779
Cash deposits	628	(628)	-	-	-
Investments	1,047,566	-	-	-	1,054,779
Reinsurance share of TP	90,387	-	(90,387)	-	-
Best Estimate Solvency II	-	-	50,300	-	50,300
Reinsurance recoverables	90,387	-	-	-	50,300
Deposits to Cedants	41,893	-	-	-	41,893
Deferred Acquisition Costs	86,039	-	(86,039)	-	-
Insurance receivables (policyholder, intermediaries)	35,132	(24,058)	-	-	11,074
Adj: Total future Premium (incl. XL) and commission (Pipeline)	161,575	-	(161,575)	-	-
Insurance Receivables (policyholder, intermediaries)	196,707	-	-	-	11,074
Other Receivables (trade, other)	-	908	-	-	908
Deferred Tax Assets	176	(176)	-	-	-
Current income tax assets	-	-	-	-	-
Other assets and Accruals	1,267	12,519	(635)	-	13,151
Current Tax Assets	844	(844)	-	-	-
Accrued interest financial investments	7,868	(7,868)	-	-	-
Adj: UPR considered as Customer deposits (ceded)	-	-	29,769	-	29,769
Adj: DAC considered as Customer deposits (gross)	-	-	-	-	-
Adj: Commissions considered as Accrual	-	12,689	-	-	12,689
Adj: Commission Sliding Scales due to impact of LAT	-	-	4,107	-	4,107
(Any) Other Assets, not elsewhere shown	9,979	-	-	-	59,716
Cash and Cash equivalents	109,923	628	-	-	110,551
Total Assets	1,582,736	1,010	-	254,469	1,329,278
Provisions Irish GAAP	497,971	-	497,971	-	-
UPR (Unearned Premium Reserve) Irish GAAP	221,926	-	221,926	-	-
Best Estimate Solvency II	-	-	-	-	351,546
Risk Margin Solvency II	-	-	57,990	-	57,990
Gross Technical Provisions	719,897	-	-	-	409,536
Cash deposits from reinsurers	42	-	-	-	42
Reinsurance accounts payable	56,190	(35,523)	-	-	20,667
Adj: Total future Premium (incl. XL) incl. comm. (ceded Pipeline)	28,290	-	(28,290)	-	-
(Re)insurance accounts payable	84,480	-	-	-	20,667
Deferred Tax Liabilities	-	(176)	2,407	-	176
Current income tax liabilities	-	-	-	-	2,231
Other provisions (non technical)	-	-	-	-	-
Amounts owned credit institut.	-	-	-	-	-
Payables (trade, other)	3,816	985	197	-	1,182
Pension benefit obligations	-	-	-	-	4,998
Adj: Total URC (Unearned Reinsurance Commission)	6,198	-	(6,198)	-	-
Adj: total future premium (return premium provision)	16,121	-	(16,121)	-	-
Other liabilities and Accruals	2,504	-	48	-	2,552
Adj: UPR considered as Customer deposits (gross)	-	-	16,893	-	16,893
Adj: URC considered as Customer deposits	-	-	28,746	-	28,746
Adj: Commissions considered as Accrual	-	35,724	13,271	-	48,995
Adj: Commission Sliding Scales due to impact of LAT	-	-	26,703	-	26,703
(Any) Other liabilities	24,823	-	-	-	123,889
Total Liabilities	833,058	1,010	-	272,705	561,363
Own funds (capital and reserves)	674,678	-	16,854	-	691,533
Subordinated Loan (Solvency2)	75,000	-	1,381	-	76,381
Own Funds	749,678	-	18,235		767,914

F-3 Solvency II Valuation Principles (excluding technical provisions – refer D-2)

The Solvency II valuation principles are in accordance with articles 75-86 of the Solvency II Directive, articles 7-16 of the Delegated Acts and the secondary Solvency II laws and regulations.

Functional and presentation currencies

The financial statements of the Atradius Re are presented in the currency of the primary economic environment in which it operates (its functional currency). Both the financial statements and the Solvency II balance sheet are presented in thousands of Euro (EUR).

Transactions and balances

Foreign currency transactions are translated into the functional currency using the exchange rates prevailing at the dates of the transactions. Foreign exchange gains and losses, that result from the settlement of foreign transactions and from the translation at year-end exchange rates of monetary assets and liabilities denominated in foreign currencies, are recognised in the income statement under

FRS 102 'The Financial Reporting Standard applicable in the UK and Republic of Ireland' and are part of the eligible capital in the Solvency II balance sheet.

Monetary assets and liabilities denominated in foreign currencies are translated to the functional currency at the exchange rate at the reporting date. Non-monetary assets and liabilities that are measured at fair value in a foreign currency are translated to the functional currency at the exchange rate when the fair value was determined.

Software

Computer software acquired and computer software self-developed are treated as intangible assets and are valued at nil.

Property, plant and Equipment for own use (PPE)

In the Solvency II balance sheet PPE is stated at fair value. PPE consists of fixtures & fittings and other fixed assets. As an approximation of the fair value, PPE is measured in accordance with accounting principles applied for the financial statements.

In the financial statements, PPE is stated at historical cost less accumulated straight-line depreciation and impairment losses. The depreciation period is based on the estimated economic useful life of the asset.

Financial investments

The fair values of financial instruments traded in active markets are based on quoted market prices at the end of the reporting period. The quoted market price used for financial investments held by the Atradius Re is the current bid price. Transaction costs on initial recognition of financial investments are expensed as incurred.

The fair values correspond to the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. Whenever possible, the fair values are based on quoted market prices. If no quoted market price is available, we use valuation techniques based on market prices of comparable instruments or parameters from comparable active markets (market observable data).

In the financial statements, all financial instruments available for sale are classified as Level 1 of the fair value hierarchy (quoted prices in active markets), in conformity with the hierarchy disclosures in Financial Reporting Standard (FRS) 102.

Accounts receivable on (re)insurance business

Accounts receivables on (re)insurance business include amounts due from agents, brokers, insurance contract holders and reinsurers.

Since the net book value of accounts receivable balances includes an allowance for bad debt and the remaining balances are substantially all current, the carrying amount is considered to be a good approximation of the fair value.

Miscellaneous assets and accruals

The items included in miscellaneous assets and accruals are substantially all current and consequently the carrying amount in the financial statements is considered a good approximation of the fair value, for those items in the financial statements

classified within any other assets in the Solvency II balance sheet.

Cash and cash equivalents

Cash and cash equivalents include cash on hand and short term deposits held on call with banks that are subject to an insignificant risk of change in their fair value and are used by Atradius Re in the management of its short-term commitments.

Current and deferred income tax

Current tax is the expected tax payable or receivable on the taxable income for the year, using tax rates enacted or substantively enacted at the end of the reporting period, and any adjustment to tax payable in respect of previous years.

Deferred income tax is provided in full, using the liability method, on temporary differences arising between the tax bases of assets and liabilities and their carrying amounts in Atradius Re's Solvency II balance sheet. Deferred income tax is determined using tax rates (and laws) that have been enacted or substantively

enacted at the end of the reporting period and are expected to apply when the related deferred income tax asset is realised or the deferred income tax liability is settled.

Deferred income tax assets are recognised to the extent that it is probable that future taxable profit will be available against which the temporary differences can be used.

Employee benefits assets/liabilities Pension

Atradius Re participates in a defined contribution pension scheme. The assets of the scheme are held separately from those of the company in independently administered funds.

Bonuses and annual leave

A liability for bonuses and profit sharing is recognised based on a formula that takes into consideration, amongst other things, individual targets and the profit attributable to the Atradius Re's shareholders. A liability is recognised where contractually obliged, or where there is a past practice that has created a constructive obligation.

The Company recognises a provision for annual leave accrued by employees as a result of services rendered in the current reporting period, and which employees are entitled to carry forward and use within the next 12 months. The provision is measured as the salary cost payable for the period of absence.

Accounts payable on (re)insurance business

Receivables and payables include amounts due to agents, brokers and insurance contract holders. The carrying amount is considered a good approximation of the fair value.

Trade and other payables

The trade and other payables due are substantially all current and consequently the carrying amount is considered a good approximation of the fair value.

Other liabilities

Other liabilities are substantially all current and consequently the carrying amount is considered a good approximation of the fair value.

Current and deferred income tax

For the valuation principles of current and deferred income taxes see D-1 Assets.

Contingent liabilities

Contingent liabilities relate only to non-insurance liabilities. If information about the current or potential size or nature of contingent liabilities could influence the decision-making or judgement of the intended user of that information, including the supervisory authorities, these (material) liabilities have been recognised in the Solvency II balance sheet. The value is based on the expected present value of future cash-flows required to settle the contingent liability over the lifetime of that contingent liability, using the basic risk-free interest rate term structure.