Classic Brand Europe DAC

Solvency and Financial Condition Report (“SFCR”) for the financial year ended 31 December 2019

Contents

Executive Summary

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

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

Company Background

Classic Brand Europe DAC is a company incorporated in Ireland and is authorised by the Central Bank of Ireland as a composite reinsurance undertaking in accordance with the provisions of the European Union (Insurance and Reinsurance) Regulations.

The Company is a composite captive reinsurance undertaking that assumes by reinsurance, both life and non-life risks, in respect of group companies of The Coca-Cola European Partners Group.

Business and Performance

The Company has a balance on the technical account for non-life insurance business of €1,160K for the financial year ended 31 December 2019 (2018: €1,038K). The directors consider both the level of business and the year-end financial position to be satisfactory.

The Company's assets are prudently invested, providing access to funds at short notice taking into account the liquidity requirements of the business and the nature and timing of insurance liabilities.

System of Governance

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

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

Outsourced Activities

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

Critical Outsourcing Arrangements				
Outsourced Provider	**Service Outsourced**	**Internal/External**	**Jurisdiction**	**Outsourcing Oversight**
Marsh Management Services (Dublin) Limited	Captive Manager	External	European Union	Chairman (PCF-3)
	Compliance Function			
	Internal Audit Function			
KPMG	Head of Actuarial Function	External	European Union	

Risk Profile

The following table outlines the material risks to which the Company is exposed as well as the undiversified capital charge associated with those risks as at 31 December 2019.

Risk	Capital Charge 2019 €'000	Capital Charge 2018 €'000
Non-life underwriting risk	8,162	3,610
Health underwriting risk	5,897	5,162
Life underwriting risk	3,254	3,378
Market risk	154	286
Counterparty default risk	2,609	2,254

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

Valuation for Solvency Purposes

The Company's assets and liabilities are valued on a best estimate basis under Solvency II methodology. This differs in some respects from the GAAP valuations presented in the financial statements. In particular, the technical provisions in the Solvency II balance sheet represent the present value of all future cash flows required to settle the insurance and reinsurance obligations over the lifetime of those obligations. A risk margin is also included within the Solvency II technical provisions, which represents the cost to the Company of holding an amount of eligible own funds equal to the Solvency Capital Requirement ("SCR") necessary to support insurance and reinsurance obligations over the lifetime of those obligations. Section D of this report compares in detail the Solvency II balance sheet with that included in the financial statements

Capital Management

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

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

At the end of 2019, the Company had a surplus of assets over liabilities of €17.3m (2018: €12.5m) on a solvency II valuation basis. This compares to a SCR requirement of €12.9m (2018: €9.6m) and indicates a solvency coverage ratio of 134% (2018: 129%). The MCR coverage ratio is 534% (2018: 379%).

A BUSINESS and PERFORMANCE

A.1 Business

A.1.1 Name and legal form of the undertaking

Classic Brand Europe DAC (hereinafter “the Company”) is incorporated in the Republic of Ireland and is a private company limited by shares.

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

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

A.1.3 External auditor of the undertaking

The independent auditors of the Company are:
Ernst & Young, Chartered Accountants, Ernst & Young Building, Harcourt Street, Dublin 2, Ireland.

A.1.4 Holders of Qualifying Holdings in the Undertaking

The Company is wholly owned by Coca-Cola European Partners Luxembourg SARL, a company incorporated in Luxembourg.

A.1.5 Legal Structure of the Group

The ultimate parent undertaking is Coca-Cola European Partners plc, a company incorporated in the United Kingdom.

A.1.6 Material lines of business and geographical areas

The Company is a composite captive reinsurance undertaking (life and non-life), reinsuring the property damage/business interruption, products recall, private medical insurance and employee benefits risks of Coca-Cola European Partners plc.

The material geographical area in which the Company operates is the EU.

A.1.7 Significant Business events during the reporting period

No significant business events to report.

A.2 Underwriting Performance

The premium income written by the Company was derived from the coverage of the life and non-life risks of Coca-Cola European Partners.

The Company reinsures the following lines of business: Property Damage/Business Interruption, products recall, private medical insurance and employee benefits. For the purposes of capital reporting, these are categorised as:

Class of Business as per Local GAAP	Solvency II Class of Business
Non- Life: Property Damage/Business Interruption	Non- Life: Proportional Property
Non- Life: Products Recall	Non- Life: Non Proportional Property Reinsurance
Non-Life : Private Medical Insurance	Health (Non-Similar to Life) – Proportional Reinsurance
Employee Benefit – (Life)	Life Reinsurance
Employee Benefit – (Disability)	Health (Similar to Life) Reinsurance

The Company has determined that the Euro ("€") is the functional currency.

The below is a summary of the technical (underwriting) account for the year ended 31 December 2019 by material line of business and geographical area (based on Irish GAAP):

<u>Underwriting performance by material line of business and geographical areas (including aggregate performance).</u>

Aggregate UW Performance	31/12/2019	31/12/2018
	€'000	€'000
Gross premiums written	13,403	15,524
Gross premiums earned	12,489	14,431
Gross claims incurred	9,841	11,519
Gross operating expenses	1,492	1,886
Reinsurance balance	-	-
Allocated Investment Return	4	12
Other Income	-	-
Net Technical (loss)/profit	**1,160**	**1,038**

2019	Life €	Non-Life €	Total €
Gross premiums written:			
Risks located in:			
Europe	5,742,311	7,660,899	13,403,210
Gross premiums earned	5,695,245	6,793,979	12,489,224
Other Income	-	-	-
Gross claims incurred	(4,650,688)	(5,190,429)	(9,841,117)
Gross operating expenses	(1,593,600)	101,743	(1,491,857)
Gross technical result	(549,043)	1,705,293	1,156,250
Reinsurance balance	-	-	-
Allocated investment return	1,643	2,192	3,835
Net technical result	**(547,400)**	**1,707,485**	**1,160,085**

2018	Life €	Non-Life €	Total €
Gross premiums written:			
Risks located in:			
Europe	5,936,217	9,588,483	15,525,060
Gross premiums earned	5,904,043	8,527,248	14,431,291
Other Income	-	-	-
Gross claims incurred	(4,537,847)	(6,981,273)	(11,519,120)
Gross operating expenses	(1,231,801)	(654,589)	(1,886,390)
Gross technical result	134,395	891,386	1,025,781
Reinsurance balance	-	-	-
Allocated investment return	4,578	7,606	12,184
Net technical result	139,053	898,912	1,037,965

A.3 Investment Performance

A.3.1 Income and expenses arising by asset class

The Company has an investment strategy which complies with the requirements of “the prudent person principle”.

As at 31 December 2019 the Company’s investment portfolio comprised the following material asset classes:

Asset Class	31/12/2019		31/12/2018	
	Amount €’000	% of portfolio	Amount €’000	% of portfolio
Cash at Bank	24,223	100%	21,485	100%
Total	**24,223**	**100%**	**21,485**	**100%**

The table below sets out the investment returns by asset class:

Asset Class	31/12/2019	31/12/2018
	€’000	€’000
Cash at Bank	-	-
Intercompany Loan	6	25
Total	**6**	**25**

A.3.2 Gains and losses recognised directly in equity

No gains and losses have been recognised directly in equity.

A.3.3 Investments in securitisation

There are no investments in securitisation.

A.4 Performance of Other Activities

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

A.5 Any Other Information

The outbreak of the coronavirus (COVID-19) is leading to disruption in the global markets. Such an operating environment has the potential to have an adverse impact on the Company's operations and financial position. The future impact of the current economic situation is uncertain and difficult to predict, however the Board are monitoring developments and any potential impact on the Company's risk profile.

B SYSTEM of GOVERNANCE

B.1 General information on the system of governance

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

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

Board of Directors:

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

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

M. McEwan (Chairman)

F. Govaerts

C. van Zijdervelt

B. McDonagh

Independent Control Functions:

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

Risk Management Function

The role of the Company's risk management function is to identify and evaluate the major risks facing The Company and to facilitate the implementation of the risk management system. Having considered the nature scale and complexity of the Company, the Board determined that the role of the RMF shall be undertaken by the Captive Manager, Marsh Management Services (Dublin) Limited ("the Manager").

The roles and responsibilities of the risk management function are set out within the risk management policy.

Compliance Function

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

Actuarial Function

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

Internal Audit Function

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

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

Ms. Joyce King-Lavinder resigned her position as a Director of the Company during the period. Mr. Conrad van Zijdervelt was appointed to the Board during the period.

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

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

The Company does not have any employees. Day to day running of the Company is handled by the Manager under a third party administrative agreement.

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

The Board of Directors of the Company includes Group Directors who are remunerated via their service agreements with Coca-Cola European Partners.

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

The Company is a composite captive reinsurance undertaking (life and non-life), reinsuring the property damage/business interruption, products recall, private medical insurance and employee benefits risks of Coca-Cola European Partners.

There was a loan agreement in place with Bottling Holdings Luxembourg during 2019. This loan was repaid in full in March 2019 and the loan balance to the Company as at 31 December 2019 was Nil (2018: Nil).

The Company did not enter into any transactions with key management personnel in Coca-Cola European Partners during the year ended 31 December 2019.

Mr. B. McDonagh, a Director of the Company, is also a Director of the Captive Administration Manager, Marsh Management Services (Dublin) Limited.

B.2 Fit and Proper requirements

B.2.1 Requirements for skills, knowledge and expertise

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

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

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

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

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

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

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

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

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

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

B.3.1 Risk management system

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

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

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

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

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

<u>Identify</u>

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

<u>Assess</u>

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

<u>Manage</u>

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

<u>Monitor/Report</u>

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

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

The result is a risk management strategy, which is led by the Board of Directors whilst being embedded in the Company's business systems, strategy and policy setting processes and the activities of the Company.

B.3.2 Implementation of the Risk Management System

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

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

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

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

<u>1st Line of Defence – Day to Day:</u>

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

<u>2nd Line of Defence – Oversight:</u>

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

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

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

<u>3rd Line of Defence – Independent Assessment:</u>

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

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

External Audit: The Board recognises that the independent external auditor has an important role in the effectiveness of the governance and risk management systems of the Company. The Company is required by law to appoint an external auditor on an annual basis.

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

B.3.3 ORSA

B.3.3.1 ORSA process

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

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

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

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

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

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

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

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

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

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

B.3.3.2 ORSA review and approval process

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

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

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

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

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

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

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

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

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

The Company has sufficient capital to meet its base case SCR for its current and projected business activities over the 3-year business planning horizon. The Company also exceeds its strategic minimum SCR coverage over the period.

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

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

B.4 Internal Control System

B.4.1 Description of the internal control system

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

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

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

B.4.2 Implementation of the compliance function

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

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

The role of the Board appointed Compliance Officer is to:

- assist the Board with ensuring ongoing compliance with legislation and applicable requirements;
- enhancing the Company’s awareness of compliance matters;
- monitor the Company’s compliance with (re)insurance legislation and applicable requirements and guidelines;

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

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

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

B.5 Internal audit function

B.5.1 Implementation of the internal audit function

The Company has outsourced its Internal Audit Function to the Manager. The internal audit function possesses a remit to examine and evaluate the functioning, effectiveness and efficiency of the internal control system and all other elements of the system of governance.

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

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

B.5.2 Independence of the internal audit function

The internal audit function provides independent and objective assurance services, via an Internal Audit Agreement between the Company and the Manager.

B.6 Actuarial function

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

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

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

B.7 Outsourcing

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

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

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

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

<table>
<tr><th colspan="5">Critical Outsourcing Arrangements</th></tr>
<tr><th>Outsourced Provider</th><th>Service Outsourced</th><th>Internal/External</th><th>Jurisdiction</th><th>Outsourcing Oversight</th></tr>
<tr><td rowspan="3">Marsh Management Services (Dublin) Limited</td><td>Captive Manager</td><td rowspan="3">External</td><td rowspan="3">European Union</td><td rowspan="4">Chairman (PCF-3)</td></tr>
<tr><td>Compliance Function</td></tr>
<tr><td>Internal Audit Function</td></tr>
<tr><td>KPMG</td><td>Head of Actuarial Function</td><td>External</td><td>European Union</td></tr>
</table>

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

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

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

No other material changes regarding the system of governance of the Company took place during the period.

C RISK PROFILE

C.1 Underwriting risk

C.1.1 Key underwriting risks

The table below outlines the material components of the underwriting risk modules as at 31 December:

Underwriting Risk	% of undiversified basic SCR 2019	% of undiversified basic SCR 2018
Non-Life	41%	25%
Health (Non-Similar to Life)	6%	14%
Life	16%	23%
Health (Similar to Life)	24%	21%

Underwriting risk arises from two sources – premium risk (pricing) and adverse claims development (reserve risk). There are a number of material risks that are considered as a result of the Company's (re)insurance underwriting.

The company accepts reinsurance risk through its reinsurance contracts whereby it assumes various risks of Coca-Cola European Partners. The company is exposed to the uncertainty surrounding the timing, frequency and severity of claims under these contracts.

The risks associated with non-life reinsurance contracts are complex and subject to a number of variables which complicate quantitative sensitivity analysis. The company uses several statistical techniques based on past claims development experience. This includes indications such as average claims cost, ultimate claims numbers and expected loss ratios.

For premium risk, the Company has considered the risk of underpricing of premiums resulting in higher loss ratios than expected. Pricing is determined by negotiation with the fronting insurers and is based on the performance of the business.

For reserve risk, the Company has considered the risk of over- and under-reserving of actual and expected claims. In this case the Company has sufficient historical premium and claims data to demonstrate a very stable insurance business written and has determined the appropriate loss ratio for the risks written.

The Company has no appetite for the underwriting of risks outside of its approved underwriting policy.

Catastrophe Risk

The risk of a major natural or man-made catastrophe event occurring, while not listed in the Company's risk register, has been considered but has been determined as highly unlikely given the nature and execution of the business.

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

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

- Having in place clear underwriting and reserving philosophies and procedures and controls in relation to pricing and reserving;
- Assessing reinsurance risks with quality underwriting and claims expertise and information;
- Retaining risk within an approved risk appetite and solvency requirements;
- Transferring risk if required, through retrocession with high credit quality entities;
- Diversifying and limiting reinsurance risk through ongoing review and management;
- Monitoring changing environment and market conditions that affect risk;
- Reporting of actual positions against the Company’s risk appetite metrics takes place on a quarterly basis as part of the Company’s regulatory reporting process;
- The ORSA includes stress and scenario testing which is used to assess the risks under stressed conditions;
- Independent opinion on the reasonableness and adequacy of the overall underwriting policy is provided by the Head of Actuarial Function on an annual basis.

C.1.3 Material risk concentrations

The Company seeks to avoid concentration of risks by accepting reinsurance of risks which are sourced across several countries in Europe and across a number of lines of business.

C.2 Market risk

C.2.1 Material market risks

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

Investment objectives are outlined in the Company’s Investment and Asset Liability Policy.

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

Market Risk sub-module	€’000 2019	€’000 2018
Concentration	-	-
Spread	-	-
Currency	152	284

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

There is no concentration risk charge applied due to the repayment of the intercompany deposit (No rating).

Spread Risk: the sensitivity of the value of investments, primarily bonds and deposits in respect of the Company, to changes in the level or in the volatility of credit spreads. Spread risk is linked to the credit rating of assets held and the effect of a market change in the credit curve.

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

Interest and spread risk are not considered material given the nature and structure of the Company's investments. The Company has allocated an interest rate charge of €3k and no spread risk charge.

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

Currency risk arises mainly on the UK Employee Benefits and Medical lines of business which are written in GBP and is considered a material risk. The Company has allocated a currency charge of €152k.

C.2.2 Prudent person principle applied to market risks

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

C.2.3 Assessment and risk mitigation techniques used for market risks

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

- Compliance with the Investment and Asset Liability Policy as approved by the Company's Board of Directors;
- Retaining risk within an approved risk appetite and solvency requirements;
- Diversifying and limiting investment risk through ongoing review and management;
- Monitoring changing environment and market conditions that affect risk;
- Reporting of actual positions against the Company's risk appetite metrics takes place on a quarterly basis as part of the Company's regulatory reporting process;
- The ORSA includes stress and scenario testing which is used to assess the risks under stressed conditions.

C.2.4 Material risk concentrations

A breakdown of risk charges is included under Section E2.2.

C.3 Credit risk

C.3.1 Material credit risks

Credit risk at 31 December comprises 13% (2018: 15%) of the undiversified basic SCR.

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

The counterparty default risk module in the Standard Formula is driven by cash at bank, the escrow fund, the loss deposit fund and reinsurance balances receivable.

C.3.2 Prudent person principle applied to credit risks

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

C.3.3 Assessment and risk mitigation techniques used for credit risks

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

- Minimum rating criteria for the placing of deposits and opening of bank accounts, in line with the Investment and Asset Liability Policy.
- Monitoring the credit ratings of counterparties;
- Reporting of cash, investment and liquidity positions takes place monthly as part of the Company's management accounts reporting process;
- Reporting of actual positions against the Company's risk appetite metrics takes place on a quarterly basis as part of the Company's regulatory reporting process;
- Retaining risk within an approved risk appetite and solvency requirements;
- The ORSA includes stress and scenario testing which is used to assess the risks under stressed conditions.

C.3.4 Material risk concentrations

The credit risk exposure is concentrated in that all of the cash at bank is held with one institution. Reinsurance receivables are spread amongst a number of fronting companies.

C.4 Liquidity risk

C.4.1 Material liquidity risks

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

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

The Company has considered the risk of a lack of liquidity available to pay insurance liabilities in its risk register. No specific allocation of capital is considered necessary for this risk.

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

C.4.2 Prudent person principle applied to liquidity risks

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

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

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

- Compliance with the Liquidity and Concentration Policy as approved by the Company's Board of Directors;
- Retaining risk within an approved risk appetite and solvency requirements;
- The Manager monitors cash movements and performs cash flow forecasting which are regularly reported to the Company;
- Reporting of cash, investment and liquidity positions takes place monthly as part of the Company's management accounts reporting process.

C.5 Operational risk

C.5.1 Material operational risks

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

The Company seeks to limit all operational risk through the implementation of a robust system of internal controls and procedures.

For such non-quantifiable risks, the Company has set a strategic surplus (target) as a prudent buffer to the Standard Formula calculation.

Operational risks are also addressed in the capital requirement as an addition to the BSCR to the extent that they have not been explicitly covered in other risk modules. The operational risk capital charge as at 31 December 2019 is €376k (2018: €431k).

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

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

- Identifying and analysing risk through a disciplined risk assessment process;
- Mitigating or avoiding risks that do not fit within the Company's business objectives;
- Implementing a robust system of internal controls and procedures;
- Segregation of duties;
- Monitoring and internal reporting;
- Outsourcing its management to an experienced management company;
- Setting a strategic surplus target above the SCR;
- Commitment of effective corporate governance.

C.6 Other material risks

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

Sample risks include:

- Regulatory and Compliance;
- Loss of key personnel/director's resignation;
- Outsourcing.

The Company has no appetite for regulatory risk. It is the objective of the Company to be at all times in compliance with Insurance Acts and Regulations, and with Guidelines issued by the insurance supervisory authority and other applicable legislation in accordance with good corporate governance and codes of conduct.

The Board is satisfied that the Company has a succession plan in place and in the event that a director resigns or intends to resign the parent Company will provide a replacement nominee for that position as soon as possible.

The Board recognises that the Company operates on a basis of an outsourced model, whereby the day to day operations and number of key functions are outsourced; the Board is satisfied that all outsourcing agreements include an appropriate period notice.

This would provide the Company with sufficient time to find an alternative professional services provider. Additionally, performance of outsourced providers is reviewed on an annual basis and such review would flag any potential deficiencies of the individual service provider.

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

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

N/A

C.8 Stress and sensitivity tests

The Company's ORSA contains 4 scenarios. Stress testing is based on the largest risks per the Company's risk register, which have been determined to be:

1. Increased loss ratio over all lines of business throughout the projection period.;
2. Severe market crash;
3. Impact of incorrect data used in modelling the SCR results of the Company.
4. Test the Company's resilience to forced closure to new business
5. Reverse stress

Robust risk mitigation practices and remediation plans are in place to address these risks.

As a part of 2019 ORSA the Company considered a reverse stress test. This can be defined as a stress test that requires assessment of scenarios and circumstances that would render its business model unviable, thereby identifying potential business vulnerabilities.

In this scenario, a combination of the following stresses was tested:

- Increase in loss ratios as per Scenario 1- with no recovery over the projection period
- A downgrade in all assets by one credit step
- A 25% shock to non-Euro assets and liabilities

This combination of stresses would cause a breach in the SCR of the Company. This is managed through the capital management policy which recognises the continued support required from the shareholder for any future capital needs the Company may have.

The results of the stress testing evidence that the Company is well capitalised at present and will have sufficient own funds to meet its overall solvency needs throughout the projection period. No further general management actions are required outside of the existing reporting and monitoring controls are in place.

C.9 Any Other Information

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

D VALUATION for SOLVENCY PURPOSES

D.1 Assets

D.1.1-2 Local GAAP and Solvency II Valuations

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

	31/12/2019		31/12/2018	
	Assets per GAAP	Assets per Solvency II	Assets per GAAP	Assets per Solvency II
	Total €'000	Total€'000	Total €'000	Total €'000
Cash and Cash Equivalents	24,223	32,557	21,485	27,584
Intercompany Loan	-	-	-	-
Reinsurance Debtors	11,614	11,614	10,289	10,289
Loss Deposit Fund	8,025	-	5,805	-
Other debtors – escrow fund	309	-	294	-
Other Assets	-	-	-	-
Deferred Acquisition Costs	220	-	190	-
Deferred Tax Asset	-	-	-	329
Total assets	**44,391**	**44,171**	**38,063**	**38,202**

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

<u>Cash and cash equivalents</u>

Cash and cash equivalents includes cash in hand, deposits held at call with banks, other short-term highly liquid investments with original maturities of three months or less. Cash and cash equivalents are measured at fair value. Adjustment for solvency purposes relates to the re-class of the escrow fund and the loss deposit fund to cash and cash equivalents.

<u>Intercompany Loan</u>

Loan to Group undertaking is measured at fair value. These assets are held within a business model whose objective is to hold assets in order to collect contractual cash flows. The contractual terms of these assets give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

<u>Deferred acquisition costs</u>

Commissions, which are related to the acquisition of new insurance contracts and the renewal of existing insurance contracts, are deferred in the balance sheet to the extent that they are attributable to premiums unearned at the balance sheet date.

Adjustment for solvency purposes relates to the removal these deferred acquisition costs as there is no concept of deferred acquisition costs in Solvency II; future acquisition cost cash flows are valued in Solvency II technical provisions.

D.2 Technical Provisions

D.2.1 Local GAAP and Solvency II Valuations

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

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

Insurance Class	31/12/2019	
	TPs per GAAP	TPs per Solvency II
	€'000	€'000
Non- Life: Property Damage/Business Interruption		
Best estimate of liabilities (BEL)	3,707	1,582
Risk margin		108
Non-Life : Non Proportional Property Reinsurance		
Best estimate of liabilities (BEL)	2,714	2,943
Risk margin		201
Non-Life : Private Medical Insurance		
Best estimate of liabilities (BEL)	4,823	3,769
Risk margin		257
Employee Benefit – (Life)		
Best estimate of liabilities (BEL)	6,237	3,486
Risk margin		238
Employee Benefit – (Disability)		
Best estimate of liabilities (BEL)	7,074	9,404
Risk margin		642
Total technical provisions	**24,555**	**22,630**

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

Class of Business as per Local GAAP	Solvency II Class of Business
Non- Life: Property Damage/Business Interruption	Non- Life: Proportional Property
Non- Life: Products Recall	Non- Life: Non Proportional Property Reinsurance
Non-Life : Private Medical Insurance	Health (Non-Similar to Life) – Proportional Reinsurance
Employee Benefit – (Life)	Life Reinsurance
Employee Benefit – (Disability)	Health (Similar to Life) Reinsurance

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

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

Under Solvency II, the IFRS UPR is replaced by the SII premium provision. The premium provision relating to the unexpired period of risk is estimated by applying a loss ratio to future premium reserve. Loss ratio assumptions (which include acquisition expenses) are based on historic loss ratio experience which are and monitored quarterly for emerging claims experience during the year.

In addition, an allowance is made for expected profits in future premiums by reflecting an allowance for expected future profits for business which is bound as at the valuation date and hence should be ‘recognised’ within the technical provisions in line with Article 17 of the Delegated Acts.

Under Solvency II, the IFRS IBNR and OSLR are transformed into Solvency II Claims Provisions. The Claims Provision is estimated as follows:

- For the PDBI and Products Recall treaties the Solvency II Claims Provisions is set equal to the IFRS IBNR + OSLR and they represent a best estimate view of expected future claims development
- The IFRS IBNR reserves held for the EB and PMI treaties are derived cumulatively from inception. The PMI IFRS OSLR is also derived cumulatively from inception. For Solvency II purposes any prudence built into these reserves is released to reflect a “probability-weighted average of future cash-flows”. The Solvency II Claims Provision is derived from historical underwriting experience.

The Standard Model then applies half a year of discounting using the relevant EIOPA yield curves and includes an allowance for ongoing maintenance expenses.

<u>Risk Margin</u>

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

The annual cost of capital is taken to be 6% (2018: 6%) of the capital estimated at each future point. The risk margin is calculated without simplification.

D.2.2 Uncertainty associated with the value of Technical Provisions

All estimates of unpaid loss reserves are inherently uncertain. The key areas of uncertainty of the technical provisions are driven by the uncertainty of the underlying booked reserves. Hence, the key area of particular uncertainty relating to the Company’s liabilities is:

The volatility of underlying experience and new trends are sources of risk within the assumption setting process.

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

See analysis in Section D2.1.

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

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

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

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

D.2.8 Recoverables from reinsurance and special purpose vehicles

There were no recoverables from reinsurance or special purpose vehicles at 31 December 2019 (2018: € Nil).

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

No changes were introduced to the recognition and valuation bases used or to estimates during the year.

D.3 Other liabilities

Other liabilities at 31 December 2019 were €3.6m (2018: €3.7m) and are composed of losses payable, trade creditors, accrued expenses and deferred tax liabilities.

D.4 Alternative Methods for Valuation for other liabilities

The Company does not use any alternative methods for valuation.

D.5 Any Other Information

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

E CAPITAL MANAGEMENT

E.1 Own funds

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

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

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

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

- Own funds to be maintained at an agreed level in excess of the SCR;
- Dividends will not be paid or will be deferred if doing so would cause the Company to breach its legal and regulatory requirements or fall below the abovementioned target SCR cover;
- The Company's own funds are primarily invested in in cash at bank and an intercompany loan in line with the Board approved Investment and Asset Liability Policy.

E.1.2 Own funds analysed by tiers

An analysis of own funds is shown below:

Date	Description	Tier 1 EUR'000	Total EUR'000
1 January 2019	Opening balance comprising: Ordinary share capital Reconciliation Reserve	 1,099 11,367	 1,099 11,367
	Movement in the Reconciliation reserve for the year ended 31 December 2019	4,810	4,810
31 December 2019	Closing balance	17,276	17,276
	Represented by:		
	Ordinary share capital	1,099	1,099
	Reconciliation reserve (comprising retained earnings and Solvency II adjustments)	16,177	16,177
	Total Basic own funds after deductions	17,276	17,276

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

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

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

The eligible amount of own funds to cover the Solvency Capital Requirement is €17.3m (2018: €12.5m). This is comprised of Tier 1 unrestricted Basic Own Funds of €17.3m (2018: €12.1m) and Tier 3 funds (deferred tax asset) of nil (2018: €0.4).

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

The eligible amount of own funds to cover the Minimum Capital Requirement is €17.3m (2018: €12.1m). This is comprised of Tier 1 unrestricted Basic Own Funds of €17.3m (2018: €12.1m).

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

Reconciliation of Basic Own Funds to Equity as per financial statements as at 31 December 2019	
	€'000
Solvency II - Basic Own Funds	17,276
Total Equity as per financial statements	15,784
Difference:	1,492
Represented by:	
Difference between Net Technical Provisions and BEL	3,371
Risk Margin	(1,446)
Deferred Tax Liability	(213)
Deferred Acquisition Costs	(220)
Adjustment to other assets	-
Difference:	**1,492**

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

E.1.7 Tier 3 funds are made up of an amount equal to the value of net deferred tax assets.

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

E.2 Solvency Capital Requirement and Minimum Capital Requirement

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

The table below shows the total SCR and MCR at 31 December 2019:

	€'000 2019	€'000 2018
SCR	12,937	9,639
MCR	3,234	3,204

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

E.2.2 Solvency Capital Requirement split by risk modules

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

	€'000 2019	€'000 2018
Market Risk	154	286
Health Underwriting Risk	5,897	5,162
Non-Life Underwriting Risk	8,162	3,610
Life Underwriting Risk	3,254	3,378
Default Risk	2,609	2,254
BSCR pre Diversification	**20,076**	**14,690**
Overall Diversification Benefit	-7,302	-5,482
Basic Solvency Requirements ('BSCR')	**12,774**	**9,208**
Operational Risk	376	431
Deferred Tax Adjustment	-213	-
SCR	**12,937**	**9,639**

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

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

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

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

MCR Overview	EUR'000 2019	EUR'000 2018
Linear MCR	3,193	3,204
SCR	12,937	9,639
MCR cap	5,822	4,338
MCR floor	3,234	2,410
Combined MCR	3,234	3,204
Absolute floor of the MCR	1,200	1,200
Minimum Capital Requirement	**3,234**	**3,204**

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

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

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

E.4 Internal model information.

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

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

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

E.6 Any other information.

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

TEMPLATES

QRT ref	QRT Template name
S.02.01	Balance Sheet
S.05.01	Premiums, claims and expenses
S.05.02	Premiums, claims and expenses by country
S.12.01	Technical Provisions - Life
S.17.01	Technical Provisions – Non-life
S.19.01	Insurance claims
S.23.01	Own Funds
S.25.01	Solvency Capital Requirement – for undertakings on Standard Formula
S.28.01	Minimum Capital Requirement

The above templates are included at the end of the report.

S.02.01.02

Balance sheet

		Solvency II value
		C0010
Assets		
Goodwill	**R0010**	
Deferred acquisition costs	**R0020**	
Intangible assets	**R0030**	
Deferred tax assets	**R0040**	
Pension benefit surplus	**R0050**	
Property, plant & equipment held for own use	**R0060**	
Investments (other than assets held for index-linked and unit-linked contracts)	**R0070**	
Property (other than for own use)	**R0080**	
Holdings in related undertakings, including participations	**R0090**	
Equities	**R0100**	
Equities - listed	**R0110**	
Equities - unlisted	**R0120**	
Bonds	**R0130**	
Government Bonds	**R0140**	
Corporate Bonds	**R0150**	
Structured notes	**R0160**	
Collateralised securities	**R0170**	
Collective Investments Undertakings	**R0180**	
Derivatives	**R0190**	
Deposits other than cash equivalents	**R0200**	
Other investments	**R0210**	
Assets held for index-linked and unit-linked contracts	**R0220**	
Loans and mortgages	**R0230**	
Loans on policies	**R0240**	
Loans and mortgages to individuals	**R0250**	
Other loans and mortgages	**R0260**	
Reinsurance recoverables from:	**R0270**	
Non-life and health similar to non-life	**R0280**	
Non-life excluding health	**R0290**	
Health similar to non-life	**R0300**	
Life and health similar to life, excluding health and index-linked and unit-linked	**R0310**	
Health similar to life	**R0320**	
Life excluding health and index-linked and unit-linked	**R0330**	
Life index-linked and unit-linked	**R0340**	
Deposits to cedants	**R0350**	
Insurance and intermediaries receivables	**R0360**	19,948
Reinsurance receivables	**R0370**	
Receivables (trade, not insurance)	**R0380**	
Own shares (held directly)	**R0390**	
Amounts due in respect of own fund items or initial fund called up but not yet paid in	**R0400**	
Cash and cash equivalents	**R0410**	24,223
Any other assets, not elsewhere shown	**R0420**	
Total assets	**R0500**	44,171

S.02.01.02

Balance sheet

		Solvency II value
Liabilities		**C0010**
Technical provisions – non-life	**R0510**	8,861
Technical provisions – non-life (excluding health)	**R0520**	4,835
Technical provisions calculated as a whole	**R0530**	
Best Estimate	**R0540**	4,526
Risk margin	**R0550**	309
Technical provisions - health (similar to non-life)	**R0560**	4,026
Technical provisions calculated as a whole	**R0570**	
Best Estimate	**R0580**	3,769
Risk margin	**R0590**	257
Technical provisions - life (excluding index-linked and unit-linked)	**R0600**	13,770
Technical provisions - health (similar to life)	**R0610**	10,046
Technical provisions calculated as a whole	**R0620**	
Best Estimate	**R0630**	9,404
Risk margin	**R0640**	642
Technical provisions – life (excluding health and index-linked and unit-linked)	**R0650**	3,724
Technical provisions calculated as a whole	**R0660**	
Best Estimate	**R0670**	3,486
Risk margin	**R0680**	238
Technical provisions – index-linked and unit-linked	**R0690**	
Technical provisions calculated as a whole	**R0700**	
Best Estimate	**R0710**	
Risk margin	**R0720**	
Other technical provisions	**R0730**	
Contingent liabilities	**R0740**	
Provisions other than technical provisions	**R0750**	
Pension benefit obligations	**R0760**	
Deposits from reinsurers	**R0770**	
Deferred tax liabilities	**R0780**	213
Derivatives	**R0790**	
Debts owed to credit institutions	**R0800**	
Financial liabilities other than debts owed to credit institutions	**R0810**	
Insurance & intermediaries payables	**R0820**	3,606
Reinsurance payables	**R0830**	
Payables (trade, not insurance)	**R0840**	445
Subordinated liabilities	**R0850**	
Subordinated liabilities not in Basic Own Funds	**R0860**	
Subordinated liabilities in Basic Own Funds	**R0870**	
Any other liabilities, not elsewhere shown	**R0880**	
Total liabilities	**R0900**	26,895
Excess of assets over liabilities	**R1000**	17,276

S.05.01.01.01 Non-Life (direct business/accepted proportional reinsurance and accepted non-proportional reinsurance)

Z Axis:

				Line of Business for: non-life insurance and		Line of Business for:	Total
				Medical expense insurance	Fire and other damage to property insurance	Property	
				C0010	C0070	C0160	C0200
Premiums written	Gross - Direct Business		R0110				
	Gross - Proportional reinsurance accepted		R0120	3,858	2,978		6,836
	Gross - Non-proportional reinsurance accepted		R0130			825	825
	Reinsurers' share		R0140				
	Net		R0200	3,858	2,580		6,438
Premiums earned	Gross - Direct Business		R0210				
	Gross - Proportional reinsurance accepted		R0220	3,831	2,139		5,970
	Gross - Non-proportional reinsurance accepted		R0230			824	824
	Reinsurers' share		R0240				
	Net		R0300	3,831	2,139	824	6,794
Claims incurred	Gross - Direct Business		R0310				
	Gross - Proportional reinsurance accepted		R0320	3,905	775		4,680
	Gross - Non-proportional reinsurance accepted		R0330			526	526
	Reinsurers' share		R0340				
	Net		R0400	3,905	775	526	5,206
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	(211)	84	25	(102)
	Administrative expenses	Gross - Direct Business	R0610				
		Gross - Proportional reinsurance accepted	R0620	43	33		76
		Gross - Non-proportional reinsurance accepted	R0630			9	9
		Reinsurers' share	R0640				
		Net	R0700	43	33	9	85
	Investment management expenses	Gross - Direct Business	R0710				
		Gross - Proportional reinsurance accepted	R0720				
		Gross - Non-proportional reinsurance accepted	R0730				
		Reinsurers' share	R0740				
		Net	R0800				
	Claims management expenses	Gross - Direct Business	R0810				
		Gross - Proportional reinsurance accepted	R0820				
		Gross - Non-proportional reinsurance accepted	R0830				
		Reinsurers' share	R0840				
		Net	R0900				
	Acquisition expenses	Gross - Direct Business	R0910				
		Gross - Proportional reinsurance accepted	R0920	(254)	51		(203)
		Gross - Non-proportional reinsurance accepted	R0930			16	16
		Reinsurers' share	R0940				
		Net	R1000	(254)	51	16	(187)
	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				(102)

S.05.01.01.02 Life

Z Axis:

				Life reinsurance obligations		Total
				Health reinsurance	Life reinsurance	
				C0270	C0280	C0300
Premiums written	Gross		R1410	3,205	2,537	5,742
	Reinsurers' share		R1420			
	Net		R1500	3,205	2,537	5,742
Premiums earned	Gross		R1510	3,141	2,555	5,696
	Reinsurers' share		R1520			
	Net		R1600	3,141	2,555	5,696
Claims incurred	Gross		R1610	2,385	2,250	4,635
	Reinsurers' share		R1620			
	Net		R1700	2,385	2,250	4,635
Changes in other technical provisions	Gross		R1710			
	Reinsurers' share		R1720			
	Net		R1800			
Expenses incurred			R1900	824	706	1,530
	Administrative expenses	Gross	R1910	28	36	64
		Reinsurers' share	R1920			
		Net	R2000	28	36	64
	Investment management expenses	Gross	R2010			
		Reinsurers' share	R2020			
		Net	R2100			
	Claims management expenses	Gross	R2110			
		Reinsurers' share	R2120			
		Net	R2200			
	Acquisition expenses	Gross	R2210	824	706	1,530
		Reinsurers' share	R2220			
		Net	R2300	824	706	1,530
	Overhead expenses	Gross	R2310			
		Reinsurers' share	R2320			
		Net	R2400			
Other expenses			R2500			
Total expenses			R2600			1,594
Total amount of surrenders			R2700			

S.05.02.01.01 Home Country - non-life obligations

Z Axis:

			Home country
			Home country
			C0080
Premiums written	Gross - Direct Business	R0110	
	Gross - Proportional reinsurance accepted	R0120	
	Gross - Non-proportional reinsurance accepted	R0130	
	Reinsurers' share	R0140	
	Net	R0200	
Premiums earned	Gross - Direct Business	R0210	
	Gross - Proportional reinsurance accepted	R0220	
	Gross - Non-proportional reinsurance accepted	R0230	
	Reinsurers' share	R0240	
	Net	R0300	
Claims incurred	Gross - Direct Business	R0310	
	Gross - Proportional reinsurance accepted	R0320	
	Gross - Non-proportional reinsurance accepted	R0330	
	Reinsurers' share	R0340	
	Net	R0400	
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	85
Other expenses		R1200	
Total expenses		R1300	

S.05.02.01.02 Top 5 countries (by amount of gross premiums written) - non-life obligations

Z Axis:

			Other than home country											
			Country (by amount of gross premiums written) - non-life obligations											
			BELGIUM	BULGARIA	FRANCE	GERMANY	ICELAND	LUXEMBOURG	NETHERLANDS	NORWAY	PORTUGAL	SPAIN	SWEDEN	UNITED KINGDOM
			C0090_22	C0090_35	C0090_76	C0090_83	C0090_101	C0090_130	C0090_157	C0090_166	C0090_178	C0090_208	C0090_214	C0090_234
Premiums written	Gross - Direct Business	R0110												
	Gross - Proportional reinsurance accepted	R0120	393	9	3,098	877	36	14	196	110	46	656	157	2,068
	Gross - Non-proportional reinsurance accepted	R0130												
	Reinsurers' share	R0140												
	Net	R0200	393	9	3,098	877	36	14	196	110	46	656	157	2,068
Premiums earned	Gross - Direct Business	R0210												
	Gross - Proportional reinsurance accepted	R0220	306	7	2,970	683	28	11	153	86	36	511	122	1,880
	Gross - Non-proportional reinsurance accepted	R0230												
	Reinsurers' share	R0240												
	Net	R0300	306	7	2,970	683	28	11	153	86	36	511	122	1,880
Claims incurred	Gross - Direct Business	R0310												
	Gross - Proportional reinsurance accepted	R0320	67	1	3,198	423	5	2	26	14	6	186	21	1,258
	Gross - Non-proportional reinsurance accepted	R0330												
	Reinsurers' share	R0340												
	Net	R0400	67	1	3,198	423	5	2	26	14	6	186	21	1,258
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	7	0	(274)	15	1	0	3	2	1	12	3	43
Other expenses		R1200												
Total expenses		R1300												

S.05.02.01.03 Total Top 5 and home country - non-life obligations

Z Axis:

			Non-life and Health non-SLT
			Total Top 5 and home country
			C0140
Premiums written	Gross - Direct Business	R0110	
	Gross - Proportional reinsurance accepted	R0120	7,660
	Gross - Non-proportional reinsurance accepted	R0130	
	Reinsurers' share	R0140	
	Net	R0200	7,660
Premiums earned	Gross - Direct Business	R0210	
	Gross - Proportional reinsurance accepted	R0220	6,793
	Gross - Non-proportional reinsurance accepted	R0230	
	Reinsurers' share	R0240	
	Net	R0300	6,793
Claims incurred	Gross - Direct Business	R0310	
	Gross - Proportional reinsurance accepted	R0320	5,207
	Gross - Non-proportional reinsurance accepted	R0330	
	Reinsurers' share	R0340	
	Net	R0400	5,207
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	(102)
Other expenses		R1200	
Total expenses		R1300	(102)

S.05.02.01.04 Home Country - life obligations

Z Axis:

			Home country
			Home country
			C0220
Premiums written	Gross	R1410	
	Reinsurers' share	R1420	
	Net	R1500	
Premiums earned	Gross	R1510	
	Reinsurers' share	R1520	
	Net	R1600	
Claims incurred	Gross	R1610	
	Reinsurers' share	R1620	
	Net	R1700	
Changes in other technical provisions	Gross	R1710	
	Reinsurers' share	R1720	
	Net	R1800	
Expenses incurred		R1900	64
Other expenses		R2500	
Total expenses		R2600	

S.05.02.01.05 Top 5 countries (by amount of gross premiums written) - life obligations

Z Axis:

			Other than home country		
			Country (by amount of gross premiums written) - life		
			BELGIUM	FRANCE	UNITED KINGDOM
			C0230_22	C0230_76	C0230_234
Premiums written	Gross	R1410	2,357	2,570	815
	Reinsurers' share	R1420			
	Net	R1500	2,357	2,570	815
Premiums earned	Gross	R1510	2,315	2,570	811
	Reinsurers' share	R1520			
	Net	R1600	2,315	2,570	811
Claims incurred	Gross	R1610	1,961	2,214	461
	Reinsurers' share	R1620			
	Net	R1700	1,961	2,214	461
Changes in other technical provisions	Gross	R1710			
	Reinsurers' share	R1720			
	Net	R1800			
Expenses incurred		R1900	535	823	172
Other expenses		R2500			
Total expenses		R2600			

S.05.02.01.06 Total Top 5 and home country - life obligations

Z Axis:

			Life and Health SLT
			Total Top 5 and home country
			C0280
Premiums written	Gross	R1410	5,742
	Reinsurers' share	R1420	
	Net	R1500	5,742
Premiums earned	Gross	R1510	5,696
	Reinsurers' share	R1520	
	Net	R1600	5,696
Claims incurred	Gross	R1610	4,636
	Reinsurers' share	R1620	
	Net	R1700	4,636
Changes in other technical provisions	Gross	R1710	
	Reinsurers' share	R1720	
	Net	R1800	
Expenses incurred		R1900	1,594
Other expenses		R2500	
Total expenses		R2600	1,594

S.12.01.02
Life and Health SLT Technical Provisions

S.12.01.02.01

Life and Health SLT Technical Provisions

		Accepted reinsurance	**Total (Life other than health insurance, incl. Unit-Linked)**	Health reinsurance (reinsurance accepted)	**Total (Health similar to life insurance)**
		C0100	C0150	C0200	C0210
Technical provisions calculated as a whole	R0010				
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole	R0020				
Technical provisions calculated as a sum of BE and RM					
Best Estimate					
Gross Best Estimate	R0030	3,486	3,486	9,404	9,404
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0080				
Best estimate minus recoverables from reinsurance/SPV and Finite Re - total	R0090	3,486	3,486	9,404	9,404
Risk Margin	R0100	238	238	641	641
Amount of the transitional on Technical Provisions					
Technical Provisions calculated as a whole	R0110				
Best estimate	R0120				
Risk margin	R0130				
Technical provisions - total	R0200	3,724	3,724	10,045	10,045

Annex I
S.17.01.01
Non-life Technical Provisions

		ss and accepted proportiona		Accepted non-	
		Medical expense insurance	Fire and other damage to property insurance	Non-proportional property reinsurance	Total Non-Life obligation
		C0020	C0080	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**	333	238	1,026	1,597
Gross - direct business	**R0070**				
Gross - accepted proportional reinsurance business	**R0080**	333	238		571
Gross - accepted non-proportional reinsurance business	**R0090**			1,026	1,026
Total recoverable from reinsurance/SPV and Finite Re before the adjustment for expected losses due to counterparty default	**R0100**				
Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses	**R0110**				
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**				
Net Best Estimate of Premium Provisions	**R0150**	333	238	1,026	1,597
Claims provisions					
Gross - Total	**R0160**	3,436	1,344	1,917	6,697
Gross - direct business	**R0170**				
Gross - accepted proportional reinsurance business	**R0180**	3,436	1,344		4,780
Gross - accepted non-proportional reinsurance business	**R0190**			1,917	1,917
Total recoverable from reinsurance/SPV and Finite Re before the adjustment for expected losses due to counterparty default	**R0200**				
Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses	**R0210**				
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**				
Net Best Estimate of Claims Provisions	**R0250**	3,436	1,344	1,917	6,697
Total Best estimate - gross	**R0260**	3,769	1,582	2,943	8,294
Total Best estimate - net	**R0270**	3,769	1,582	2,943	8,294
Risk margin	**R0280**	257	108	201	566
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**	4,026	1,690	3,144	8,860
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	**R0330**				
Technical provisions minus recoverables from reinsurance/SPV and Finite Re- total	**R0340**	4,026	1,690	3,144	8,860
Line of Business: further segmentation (Homogeneous Risk Groups)					
Premium provisions - Total number of homogeneous risk groups	**R0350**				
Claims provisions - Total number of homogeneous risk groups	**R0360**				
Cash-flows of the Best estimate of Premium Provisions (Gross)					
Cash out-flows					
Future benefits and claims	**R0370**				
Future expenses and other cash-out flows	**R0380**				
Cash in-flows					
Future premiums	**R0390**				
Other cash-in flows (incl. Recoverable from salvages and subrogations)	**R0400**				
Cash-flows of the Best estimate of Claims Provisions (Gross)					
Cash out-flows					
Future benefits and claims	**R0410**				
Future expenses and other cash-out flows	**R0420**				
Cash in-flows					
Future premiums	**R0430**				
Other cash-in flows (incl. Recoverable from salvages and subrogations)	**R0440**				
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.19.01.21
Non-life Insurance Claims Information

Total Non-Life Business

Accident year / Underwriting year	**Z0010**	

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

		Development year										
	Year	**0**	**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**	**10 & +**
		C0010	**C0020**	**C0030**	**C0040**	**C0050**	**C0060**	**C0070**	**C0080**	**C0090**	**C0100**	**C0110**
Prior	**R0100**											
N-9	**R0160**											
N-8	**R0170**											
N-7	**R0180**											
N-6	**R0190**											
N-5	**R0200**	737	513	5	0	0	0					
N-4	**R0210**	860	931	-42	434	0						
N-3	**R0220**	573	472	1	2							
N-2	**R0230**	5,864	503	443								
N-1	**R0240**	4,936	425									
N	**R0250**	3,470										

		In Current year	Sum of years (cumulative)
		C0170	**C0180**
	R0100		
	R0160		
	R0170		
	R0180		
	R0190		
	R0200	0	1,255
	R0210	0	2,183
	R0220	2	1,048
	R0230	443	6,810
	R0240	425	5,361
	R0250	3,470	3,470
Total	**R0260**	4,340	20,127

S.19.01.21
Non-life Insurance Claims Information

Gross undiscounted Best Estimate Claims Provisions
(absolute amount)

		Development year										
	Year	**0**	**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**	**10 & +**
		C0200	**C0210**	**C0220**	**C0230**	**C0240**	**C0250**	**C0260**	**C0270**	**C0280**	**C0290**	**C0300**
Prior	**R0100**											
N-9	**R0160**											
N-8	**R0170**											
N-7	**R0180**											
N-6	**R0190**											
N-5	**R0200**	5,037	0	0	0	0	0					
N-4	**R0210**	1,844	1,518	453	0	0						
N-3	**R0220**	520	494	0	0							
N-2	**R0230**	4,780	1,747	12								
N-1	**R0240**	5,083	3,689									
N	**R0250**	4,008										

		Year end (discounted
		C0360
	R0100	
	R0160	
	R0170	
	R0180	
	R0190	
	R0200	
	R0210	
	R0220	
	R0230	10
	R0240	3,205
	R0250	3,482
Total	**R0260**	6,697

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**	1,099	1,099			
Share premium account related to ordinary share capital	**R0030**					
Iinitial 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**	16,177	16,177			
Subordinated liabilities	**R0140**					
An amount equal to the value of net deferred tax assets	**R0160**					
Other own fund items approved by the supervisory authority as basic own funds not specified above	**R0180**					
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds						
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	**R0220**					
Deductions						
Deductions for participations in financial and credit institutions	**R0230**					
Total basic own funds after deductions	**R0290**	17,276	17,276			
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	**R0300**					
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	**R0310**					
Unpaid and uncalled preference shares callable on demand	**R0320**					
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	**R0330**					
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	**R0340**					
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	**R0350**					
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	**R0360**					
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	**R0370**					
Other ancillary own funds	**R0390**					
Total ancillary own funds	**R0400**					
Available and eligible own funds						
Total available own funds to meet the SCR	**R0500**	17,276	17,276			0
Total available own funds to meet the MCR	**R0510**	17,276	17,276			
Total eligible own funds to meet the SCR	**R0540**	17,276	17,276			0
Total eligible own funds to meet the MCR	**R0550**	17,276	17,276			
SCR	**R0580**	12,937				
MCR	**R0600**	3,234				
Ratio of Eligible own funds to SCR	**R0620**	134%				
Ratio of Eligible own funds to MCR	**R0640**	534%				

		C0060	
Reconciliation reserve			
Excess of assets over liabilities	**R0700**	17,276	
Own shares (held directly and indirectly)	**R0710**		
Foreseeable dividends, distributions and charges	**R0720**		
Other basic own fund items	**R0730**	1,099	
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	**R0740**		
Reconciliation reserve	**R0760**	16,177	
Expected profits			
Expected profits included in future premiums (EPIFP) - Life business	**R0770**		
Expected profits included in future premiums (EPIFP) - Non- life business	**R0780**		
Total Expected profits included in future premiums (EPIFP)	**R0790**		

S.25.01.21

Solvency Capital Requirement - for undertakings on Standard Formula

		Gross solvency capital requirement	USP	Simplification
		C0110	C0090	C0090
Market risk	R0010	154		
Counterparty default risk	R0020	2,609		
Life underwriting risk	R0030	3,254		
Health underwriting risk	R0040	5,897		
Non-life underwriting risk	R0050	8,162		
Diversification	R0060	-7,302		
Intangible asset risk	R0070			
Basic Solvency Capital Requirement	R0100	12,774		

		C0110
Operational risk	R0130	376
Loss-absorbing capacity of technical provisions	R0140	
Loss-absorbing capacity of deferred taxes	R0150	-213
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	
Solvency Capital Requirement excluding capital add-on	R0200	12,937
Capital add-on already set	R0210	
Solvency capital requirement	R0220	12,937
Other information on SCR		
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 Requirements for ring fenced funds	R0420	
Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	R0430	
Diversification effects due to RFF nSCR aggregation for article 304	R0440	

S.28.01.01

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

Linear formula component for non-life insurance and reinsurance obligations

		C0010
MCR_{NL} Result	**R0010**	1,453

		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**	4,026	3,858
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**	1,690	2,978
General liability insurance and proportional reinsurance	**R0090**		
Credit and suretyship insurance and proportional reinsurance	**R0100**		
Legal expenses insurance and proportional reinsurance	**R0110**		
Assistance and proportional reinsurance	**R0120**		
Miscellaneous financial loss insurance and proportional reinsurance	**R0130**		
Non-proportional health reinsurance	**R0140**		
Non-proportional casualty reinsurance	**R0150**		
Non-proportional marine, aviation and transport reinsurance	**R0160**		
Non-proportional property reinsurance	**R0170**	3144	825

Linear formula component for life insurance and reinsurance obligations

		C0040
MCR_L Result	**R0200**	1,740

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
		C0050	**C0060**
Obligations with profit participation - guaranteed benefits	**R0210**		
Obligations with profit participation - future discretionary benefits	**R0220**		
Index-linked and unit-linked insurance obligations	**R0230**		
Other life (re)insurance and health (re)insurance obligations	**R0240**	13,769	
Total capital at risk for all life (re)insurance obligations	**R0250**		2,050,590

Overall MCR calculation

		C0070
Linear MCR	**R0300**	3,193
SCR	**R0310**	12,397
MCR cap	**R0320**	5,822
MCR floor	**R0330**	3,234
Combined MCR	**R0340**	3,234
Absolute floor of the MCR	**R0350**	1,200
		C0070
Minimum Capital Requirement	**R0400**	3,234