ECCU Assurance DAC
Solvency and Financial Condition Report ("SFCR")
(for the financial year ended 31st December 2019)

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Summary

This Solvency and Financial Condition Report, ("SFCR"), is published by ECCU Assurance DAC, ("ECCU"), and relates to the company's performance in the year to 31st December 2019.

ECCU is a life insurance undertaking, wholly owned by the Irish League of Credit Unions, ("ILCU"), which exists to provide insurance to a customer base comprised solely of credit unions affiliated to the ILCU.

ECCU outsources certain functions to the ILCU which undertakes these activities under an Agency and Management Agreement with associated Service Level Agreements. ECCU also outsources the Head of Internal Audit and the Head of Actuarial Key Functions, to Deloitte and Willis Towers Watson, respectively. Its investments are managed by Irish Life Investment Managers in accordance with the terms of a mandate defined and regularly reviewed by the ECCU Board of Directors.

The ECCU product set comprises Loan Protection (LP), Life Savings (LS) and optional riders, e.g. Death Benefit Insurance or insurance against Total Permanent Disability from any occupation. These policies provide benefits to credit unions affiliated to the ILCU upon death or total permanent disability occurring to their eligible members. This product set has remained largely unchanged since the formation of the company in 1980.

The insurance premiums are collected from its affiliated credit unions by the ILCU and paid to ECCU. Benefits are paid by ECCU directly to its policyholders, the credit unions, on foot of successful claims. Payments are made by Electronic Funds Transfer. ECCU does not receive premium from or make payments to individual credit union members.
Subject to capital requirements, and at the discretion of the board, underwriting surpluses are returned to the policyholders by way of claims experience refund when the annual results are known.

ECCU has Stop Loss and Excess of Loss Reinsurance treaties in place with Arch Reinsurance Europe Underwriting Designated Activity Company.

ECCU engages with a User Group drawn from the ILCU affiliates on matters of product and service evolution in support of ILCU Strategy implementation.

ECCU's customer base is located across the island of Ireland. This includes ILCU affiliates resident in Northern Ireland to which ECCU presently provides insurance services on a Freedom of Services basis, being regulated by the UK Financial Conduct Authority, ("FCA"), for conduct of business rules in respect of this tranche of business. ECCU's management team continues to monitor developments in respect of Brexit and has continued its engagement with the UK's Prudential Regulation Authority, ("PRA"), and FCA , during 2019 in order to position the company to continue to serve the UK resident cohort of ILCU affiliated credit unions following Brexit.

The business has been successful over its 39 year history in providing cover to credit unions at best cost while ensuring they are not left with bad debts upon the untimely death of members with outstanding loans. It is stable and predictable. It exhibits an annual seasonality in Claims experience which sees peak Claims registered in the first half of the year but this rate declines as the year progresses.

ECCU employs 13 personnel, 6 of whom transferred from the ILCU when ECCU took in-house its previously outsourced operations in 2013.

This report covers the Business and Performance of the Company, its System of Governance, Risk Profile, Valuation for Solvency Purposes and Capital Management. The ultimate Administrative Body that has responsibility for all of these matters is the Company's Board of Directors, ("the Board"). The Board is aided in this by the various governance and control functions that it has put in place to monitor and manage the business.

Material Changes over the Reporting Period

Business and Performance

Notwithstanding a volatile environment in 2019, which gave rise to uncertain and challenging economic circumstances, ECCU's financial performance in 2019 was satisfactory. Arising from the uncertainty post year end in light of COVID-19 the Directors do not recommend the payment of a dividend for the financial year ended 31 December 2019 in 2020. The claims experience refund payable to Credit Unions has increased from €5.8m in 2018 to €12.6m in 2019 due to an improvement in underwriting performance and higher investment returns. Although it is probable that the claims experience refund will be paid in full, any payment to credit unions will be deferred until further information is available on the mortality levels and trends arising from COVID-19 and the impact this will have on the Company. Claims paid, net of reinsurance, decreased to €60.5m, down €4.3m on the prior year. Earned premiums, net of reinsurance, increased to €75.5m, up €0.3m on the prior year, benefitting from an overall increase in coverage.

ECCU's prudent investment policy with an emphasis on security of capital, continuity of income and a diversity of assets delivered an overall positive return during 2019 of €4.9m (2018: €0.8m negative).

System of Governance

Independent Non-Executive Director, ("INED"), John G. Gibson retired from the Board in April 2019 after 9 years outstanding service. In accordance with ECCU's succession plan, and in order to ensure an orderly rotation of the Board of Directors, the Board appointed Caroline McDonnell as a new INED in July 2019. This new appointment was made in anticipation of the expected retirement of John G. Hickey in 2020.

Risk Profile

Brexit oriented risks were to the fore again during 2019 and will remain on the top of the management agenda in 2020.

Since year-end 2019 the World Health Organisation has formally declared COVID-19 a pandemic. COVID-19 has had a very material impact on world markets and on how companies are able to operate. This situation has the potential to have a material impact on insurance companies, (increased claims; adverse market conditions; operational difficulties in-company and with suppliers; liquidity; capital etc).

COVID-19 is therefore a major development that significantly affects disclosed information going forward however COVID-19 does not lead to additional uncertainty regarding the disclosures documented here as at year-end 2019 and the Directors are satisfied that the Company continues to be a going concern.

Where COVID-19 has created uncertainty about ECCU's future operational and economic experience ECCU seeks to address these through management and Board actions.

Gerry Jordan
Chief Executive Officer

A: Business and Performance

A.1 Business

A.1(a) ECCU Assurance Designated Activity Company is a regulated life assurance undertaking authorised by the Central Bank of Ireland under the European Union (Insurance and Reinsurance) Regulations 2015. The Company's financial year end is at 31st December.

The Company's postal address and registered office is:

ECCU Assurance DAC,
33-41 Lower Mount Street,
Dublin ,
D02 Y489
Ireland

A.1(b) The Central Bank of Ireland ("CBI") is responsible for the financial supervision of the Company.

The CBI may be contacted at:

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

The Company is regulated in the Republic of Ireland by the CBI and in Northern Ireland, for conduct of business rules, by the UK's Financial Conduct Authority, ("FCA").

A.1(c) The Company's external auditor is KPMG.

KPMG may be contacted at:

KPMG,
1 Harbourmaster Place,
IFSC,
Dublin 1

A.1(d) The Company is wholly owned by the ILCU, a trade association of affiliated credit unions on the island of Ireland. The Company's policyholders are the same credit unions.

A.1(e) The Company has one dormant, non-trading, subsidiary in the UK named ECCU Assurance Company (Services) (UK) Limited.

This subsidiary's postal address and registered office is:

Hays Galleria,
1 Hays Lane,
London,
SE1 2RD

A.1(f) The Company sells single premium group risk products to credit unions, ("CUs"), affiliated to the ILCU, in the Republic of Ireland and Northern Ireland. The policyholders are the CUs, and not the CUs' members, although it is the members' lives that are insured. The business sold in Northern Ireland is transacted under the freedom of services provisions of the Third EU Life Directive.

The assurance business written by ECCU is exclusively in the form of monthly renewable term assurance policies. The policies are structured as group risk contracts with the credit unions being the policyholders. All credit unions affiliated to the ILCU have two main policies in place:

Life Savings Policy
The credit union's Life Savings policy pays a benefit on death, subject to terms and conditions of cover, based on the amount of savings made during a member's lifetime. The amount paid will depend on the member's age when the lodgements were made and their savings history with their credit union. Withdrawals from savings may reduce the accrued insurance benefit. Savings lodged after age 70 are not insurable but cover remains in place to the date of death once the shares are not withdrawn and the credit union pays the appropriate premium.

Loan Protection Policy
The credit union's Loan Protection policy protects a credit union's loans, subject to terms and conditions of cover, by clearing the outstanding principal loan balance in the event of an eligible member's death/ (disability, optional see below). This policy also benefits the member and their next of kin by removing the burden of repaying a loan at a most difficult time. Cover under this policy ceases on the day of the members 70th birthday.

Each of the above policies has associated rider policies giving a credit union the option to enhance the cover/benefit under its main policy of cover. The optional riders, which are subject to terms and conditions of cover, are as follows:

Life Savings Riders:

Accidental Death, Dismemberment & Loss of Sight – This rider policy provides for the doubling of the amount payable under the main life savings policy in the event of accidental death. It also pays benefits based on loss of limbs and loss of sight.

Death Benefit Insurance (DBI) – The cover under this rider policy is designed to provide a lump sum payment to assist the family of a deceased member with the costs associated with bereavement.

Joint Life – As the standard Life Savings Policy covers the life of the first named member to a joint account this rider policy allows credit unions to cover the savings to pay a benefit in the event of the death of the second named person on the account. To provide for DBI benefit in respect of the 2nd named member of a joint account the credit union must also have the DBI rider in place. Accounts with more than two named individuals on the account are not insurable under the Joint Life Rider.

Loan Protection Riders:

Disability – This rider policy provides additional protection to the credit union in that it provides cover for an event which renders a member totally and permanently unable to engage in any occupation or gainful activity for remuneration. The maximum sum assured is €40,000/£30,000. Credit unions can choose to cover loans up to age 60 or 65.

Over 70 – This rider policy allows the credit union to extend the cover under its Loan Protection Policy to age 80. The cover ceases on the day of the members 80th birthday. The maximum sum assured is €40,000/£30,000.

Over 80 – This rider policy allows the credit union to extend the cover under its Loan Protection Policy to age 85. The cover ceases on the day of the members 85th birthday. The maximum sum assured is €40,000/£30,000.

Joint Life – As the standard Loan Protection Policy covers the life of the first named member to a joint account this rider policy allows credit unions to cover the loan in the event of the death of the second named person on the account and the benefit is paid on a first death basis. Again, credit unions can extend the cover under the joint account rider to age 80 or 85 were they have the Over 70 or Over 80 riders in place.

A.1(g) there are no other significant business or other events that have occurred over the reporting period that have had a material impact on the undertaking.

Reinsurance

Since 1 January 2014 Arch Reinsurance Europe Underwriting Designated Activity Company, ("Arch Re"), provides reinsurance cover to the Company. Arch Re is an Irish based reinsurer and is part of Arch Capital Group Ltd, a Bermudan based global reinsurer. Arch Re is rated A+ by S&P and Fitch.

Arch Re provides cover for individual large claims, aggregated across product lines, in excess of €40,000 or £30,000 for each life. There is a cap of €1m on each life.

A stop loss treaty comes into effect should claims exceed 105% of net written

premiums, (i.e. gross written premium per financial statements less reinsurance premium for other reinsurance treaties). The benefit is capped at 20% of the gross written premium.

During 2019 the Company renewed its reinsurance treaties with Arch Re, to 31st December 2020, without changes to their terms.

A.2 Underwriting Performance

The excess of earned premium over claims incurred, net of reinsurance, was €14.9m in 2019 (2018: €10.4m). There was a 0.4% increase in net earned premium written on the prior year primarily due to an increase in DBI premium rates as well as an overall increase in coverage. Claims paid decreased from €64.6m in 2018 to €61.4m in 2019. The decrease in the gross claims outstanding provision for 2019 was €0.4m (2018: increase of €0.5m). The net cost of reinsurance decreased by €0.3m due to an increase in reinsurance claims recoveries. Another factor impacting performance in 2019 was better investment performance. The investment returns including unrealised gains and losses amounted to a positive return of €4.9m (2018: €0.8m negative). The claims experience refund payable to Credit Unions has increased from €5.8m in 2018 to €12.6m in 2019 due to an improvement in underwriting performance and higher investment returns.

As shown in the table below gross premium written during 2019 amounted to €77m, an increase of 0.4% when compared to 2018 due to an increase in DBI premium rates. LP sums assured increased by 4%. LS sums assured increased by 1% while DBI sums assured decreased by 1%.

Total Premium Income €m			Sums Assured €m			Paid Claims Ratio %		
2017	**2018**	**2019**	**2017**	**2018**	**2019**	**2017**	**2018**	**2019**
75.4	76.7	77.0	15,895	16,143	16,424	84.1	84.2	79.8

The Company's performance in respect of life savings, loan protection and death benefit insurance in 2019 is outlined below:

Savings Assured €m			Insurable Members 000's			Claims €m		
2017	**2018**	**2019**	**2017**	**2018**	**2019**	**2017**	**2018**	**2019**
7,777	7,843	7,926	3,403	3,456	3,498	29.7	30.2	29.3

The 1.1% increase in savings assured reflects a stable position in respect of credit union shares and deposits. There has also been a 1.2% increase in the number of insurable members since 2018.

Loans Assured €m			Insurable Borrowers 000's			Claims €m		
2017	**2018**	**2019**	**2017**	**2018**	**2019**	**2017**	**2018**	**2019**
5,191	5,502	5,738	801	817	812	15.7	16.2	15.7

The increase in loans assured of 4.3% reflects the increase in assured borrowings with a slightly lower number of borrowers.

Death Benefits Assured €m			Insurable Members 000's			Claims €m		
2017	**2018**	**2019**	**2017**	**2018**	**2019**	**2017**	**2018**	**2019**
2,927	2,798	2,760	1,606	1,598	1,549	17.9	18.1	16.5

DBI sums assured were 1.4% lower in 2019 compared with 2018. There has been a 3.1% decrease in the number of insurable members since 2018.

A.3 Investment Performance

The Company continues to pursue a conservative investment policy, with 34% of the Company's invested assets taking the form of deposits with credit institutions. The remainder of ECCU's investment assets are in the form of Eurozone Government bonds (36.2%), units in an equity fund (20%), units in an infrastructure fund (7.1%), units in an absolute alpha fund (0.2%), and units in a residential property fund (2.5%). The Company's decision to invest in an infrastructure fund, an absolute alpha fund and a residential property fund was taken in order to reduce volatility in investment returns while also maintaining a reasonable investment return. The Company made a decision during 2018 to invest in the residential property fund and to disinvest in the absolute alpha fund. This decision arose from the superior returns expected from the property fund as compared with the absolute alpha fund, combined with the challenges involved in managing the absolute alpha fund. The Company's investments at year end had a market value of €70.8m.

Investment return which includes unrealised gains and losses amounted to a positive return of €4.9m (2018: €0.8m negative). The overall investment return arises from a number of factors including realised gains of €0.1m (2018: €0.4m loss) and stable bond yields available in 2019 which resulted in income from bonds remaining stable at €0.5m in 2018 and 2019. The prevailing negative interest rates in the market resulted in negative deposit income of -€0.05m in 2019 (2018: -€0.04m). There were unrealised gains on ECCU's bond portfolio of €1m (2018: €0.1m gain) and unrealised gains on the equity fund, infrastructure fund, absolute alpha fund, and residential property fund totalling of €3.1m in 2019 (2018: €1.5m loss). Overall, the Company achieved a 6.9% positive return on its investments in 2019 (2018: 1.2% negative).

	2019 € Net investment income	2019 € Net investment expense	2019 € Net realised gains and losses	2019 € **Net investment result (excl unrealised)**	2019 € Changes in fair value	2019 € **Net investment result (incl unrealised)**
Debt Securities	454,983	(1,374)	103,619	557,228	975,604	1,532,832
Unit Trusts	60,467	-	5,156	65,623	3,134,659	3,200,282
Cash and deposits	(53,045)	-	-	(53,045)	227,366	174,321
	462,405	(1,374)	108,775	569,806	4,337,629	4,907,435

	2018 € Net investment income	2018 € Net investment expense	2018 € Net realised gains and losses	2018 € **Net investment result (excl unrealised)**	2018 € Changes in fair value	2018 € **Net investment result (incl unrealised)**
Debt Securities	477,251	(1,957)	(436,940)	38,354	127,021	165,375
Unit Trusts	615,014	-	3,960	618,974	(1,515,361)	(896,387)
Cash and deposits	(41,997)	-	-	(41,997)	(42,772)	(84,769)
	1,050,268	(1,957)	(432,980)	615,331	(1,431,112)	(815,781)

Investments by asset class	**2019**		**2018**	
	Market Value €	Cost €	Market Value €	Cost €
Listed				
Shares and other variable yield securities and units in unit trusts	21,076,009	17,084,185	17,936,192	17,079,028
Debt Securities and other fixed income securities	25,640,778	24,623,363	24,282,148	24,233,055
	46,716,787	41,707,548	42,218,340	41,312,083
Unlisted				
Deposits with credit institutions	24,068,267	24,068,267	23,099,790	23,099,790
	70,785,054	65,775,815	65,318,130	64,411,873

At the end of the financial year, the average maturity of the deposits was 12.1 months (2018: 14.5 months). The average interest rate was -0.10% (2018: -0.03%).

The Company does not engage in any securitisation arrangements.

A.4 Performance of Other Activities Other Material income and Expenses

Surplus arising in the technical account in a given year, after making adequate provision for technical provisions and any adjustment necessary to meet the Company's economic capital requirements, over its planning time-horizon, is returned to its policyholders (credit unions) by way of a claims experience refund. The claims experience refund is calculated based on the combined effect of the underwriting result and investment income in the technical account. An additional calculation is performed to check that the claims experience refund to policyholders would not result in the release of capital required to be retained by the Company in order

to meet the Company's economic capital requirements, as calculated on a Solvency II basis. The total claims experience refund to credit unions arising in 2019 amounted to €12,551,286 (2018: €5,828,011).

The ILCU (parent undertaking) acts as agent of the Company. The range of services provided and the basis for the fees in respect of such services provided are set out in the Agency and Management Agreement dated 22 March 2013, as amended on 21 November 2014, between the ILCU and the Company. The ILCU fees for services provided in accordance with the Agency and Management agreement during 2019 amounted to €2,139,289 (2018: €2,039,126).

Staff costs amounted to €1,225,318 in 2019 (2018: €1,197,502).

A.5 Any Other Information

There is no other material information to disclose regarding the business and performance of ECCU.

B: System of Governance

B.1 General Information on the System of Governance

B.1.1Overview:
The Company is classified as a Medium Low Risk firm under the Central Bank of Ireland's risk-based framework for the supervision of regulated firms, Probability Risk and Impact System, ("PRISM"), and is subject to the Central Bank of Ireland's Corporate Governance Requirements for Insurance Undertakings 2015, ("the Requirements").

The Company's Board of Directors is responsible for the oversight of the business and sets its strategy and risk appetite.
John Gibson retired from the Board in April 2019. In accordance with ECCU's succession plan and to help ensure an orderly rotation of the Board of Directors, the Board had previously appointed Aisling Kennedy as a new Independent Non-Executive Director ("INED") in 2018. Caroline McDonnell was appointed as an INED, on 5th July 2019, in anticipation of the expected retirement of John G Hickey in 2020.
Thus, at year-end, the Board comprises the CEO, 4 Independent non-Executive Directors and 2 non-Executive Directors.
ECCU previously obtained a derogation from the CBI exempting it from the requirement that the majority of its directors be independent non-executive directors.

Board of Directors:

J R Kehoe (Chairman)	J G Gibson (to April 2019)
J G Hickey	G Jordan
C Murphy	M E Sharkey
A Kennedy	C McDonnell (Appointed 5 July 2019)

Company Secretary:
L D'Alton

The Company is committed to high standards of corporate governance. The Company has appointed an independent Head of Actuarial Function and completed an annual review of Governance and its Committee structures in line with the Requirements.

The Board delegates certain responsibilities to its Audit, Risk and Remuneration sub-Committees in accordance with the Requirements and terms of reference approved by the Board.

The Board met on six occasions during the year under review. The Audit, Risk and Remuneration sub-Committees operated throughout the year and reported to the Board at its subsequent meetings. The Audit Committee met on seven occasions, the Risk Committee five and the Remuneration Committee met once during the year to 31st December 2019. The Chair of each Committee is an Independent Non-Executive Director and appointed by the Board:

- Audit Committee (Chaired by Aisling Kennedy)
- Risk Committee (Chaired by J G Hickey)
- Remuneration Committee (Chaired by J G Hickey)

The Audit Committee assists the Board in discharging its responsibilities for:

- The integrity of the Company's financial statements;
- The effectiveness of the Company's internal controls;
- The Company's arrangements for its employees to raise concerns, in confidence, about possible wrongdoing in financial reporting or other matters;
- The effectiveness of the Company's Internal Audit function in the context of the Company's overall risk management system; and
- Monitoring the effectiveness, independence and objectivity of the external auditor.

The principal role of the Audit Committee is to support the Board in considering activities that expose or may expose ECCU to material audit, financial or other risk. The Committee consists of four members, all of whom are non-Executive Directors and the majority of whom are independent.

The Audit Committee works closely with the Risk Committee to ensure the successful operation of the risk management and internal control systems.

The Risk Committee assists the Board in discharging its responsibilities for:

- The effectiveness of the Company's risk management systems;
- The implementation of the Company's risk strategy and maintenance thereof;
- The oversight of investment issues;
- The timely reporting of material deviations from defined risk appetite; and
- Monitoring the effectiveness, independence and objectivity of the Risk function.

The Risk Committee is established separately from the Audit Committee and is responsible for providing oversight and advice to the Board on the current risk exposures of ECCU and future risk strategy. The Committee also provides direction and oversight in relation to regulatory policies and procedures, including those relating to risk identification, assessment, management and monitoring.

The Risk Committee also consists of four members. When appointing Risk Committee members, the Board ensures that there is an appropriate representation of Independent Non-Executive Directors which is proportionate to the nature, scale and complexity of ECCU.

There is cross membership between the Audit and Risk Committees so as to enhance Board consideration of risk related issues across the undertaking. Specifically, the Chairman of each committee is a member of the other.

The Remuneration Committee operates under delegated authority from the Board. Its role is to advise the Board on broad policy relating to the total remuneration paid to Senior Management and it also has a role in performance management and objective setting for the Senior Management Team.

The Remuneration Committee establishes the Company's remuneration policies and procedures based on best practice and the requirements issued by the Central Bank of Ireland in ensuring that no element of reward encourages excessive risk taking.
All members of the Committee are non-Executive Directors, the majority of whom are independent. The Remuneration Committee and the Risk Committee have at least one shared member.

The Company operates a Claims Appeals Committee which meets regularly to consider

appeals from credit unions in respect of claims that have been declined because they fail to meet the policy terms and conditions.

The Claims Appeals Committee comprises three ECCU representatives, one of whom is an Independent non-Executive Director, and two representatives of the ILCU, one being a member of the Insurance Committee and the other being the Head of Insurance.

The Claims Appeals Committee considers the circumstances in which the appealed claims failed in accordance with the policy terms and conditions, the representations by the credit union in its appeal, the personal circumstances of the credit union member and any events outside the control of the member.

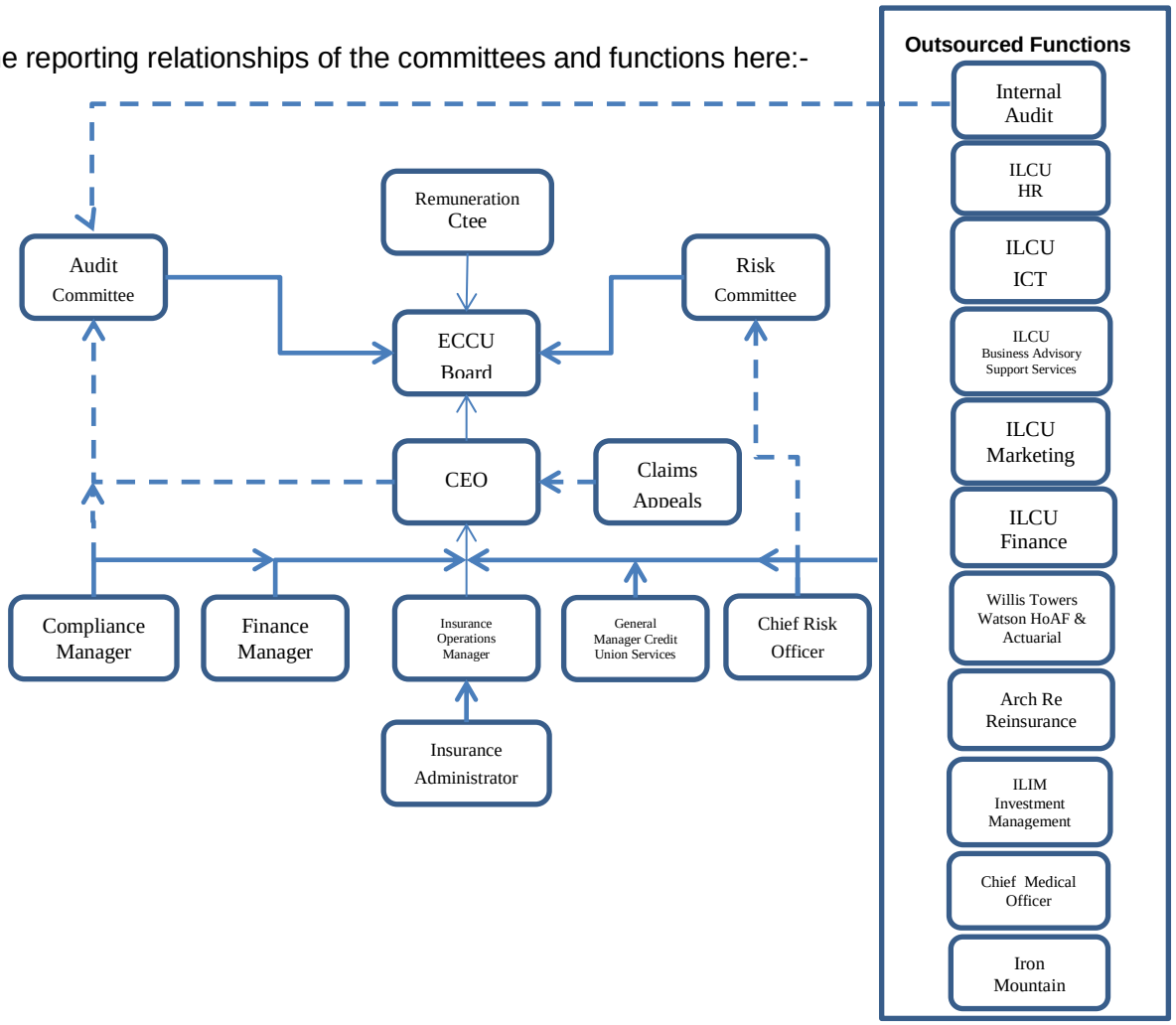
Any payments approved by the Claims Appeals Committee are reviewed by the Board and are made ex-gratia.

In 2019, 58 claims were appealed by credit unions (2018:46), of which 33 (2018:32) received ex-gratia payments.

The Senior Management Team, ("SMT"), comprises the CEO, Finance Manager, Insurance Operations Manager, General Manager Credit Union Services, the Chief Risk & Data Protection Officer and Compliance Manager.

The Internal Audit and Head of Actuarial Functions are outsourced.

The reporting relationships of the committees and functions here:-



B.1.2 Independent Control Functions:

The Company has established the four key independent control functions required under the Corporate Governance Requirements for Insurance Undertakings 2015 - risk management, compliance, actuarial and internal audit. These functions are responsible for providing oversight of and challenge to the business and for providing assurance to the Board in relation to the Company's control framework.

B.1.2.1: Chief Risk Officer ("CRO"), PCF-14:

A Chief Risk Officer is appointed to oversee the implementation of the Company's Risk Management Policies, reporting to the Risk sub-Committee of the Board, the Board and the Company's CEO. The responsibilities of the Chief Risk Officer include:

- The oversight of and adherence to the Company's Enterprise Risk Management framework (ERM)
- To be the focal point for risk event reporting of new and emerging risks, such that these can be assessed and material issues reported to the Board and Risk Committee
- To coordinate the 'Own Risk and Solvency Assessment' ("ORSA") process at least annually
- The CRO is the designated Data Protection Officer of ECCU

B.1.2.2: Head of Compliance, PCF-15:

The Compliance Manager occupies the role of Head of Compliance with responsibility for the implementation of the Company's Compliance Policy and effective processes. The Compliance Manager reports to the Audit sub-Committee of the Board and the CEO. The responsibilities of the Compliance Manager include:

- To monitor regulatory change and to inform the Company and its service providers where such changes have implications for the Company's processes
- To monitor Compliance within the Company, making recommendations where change is required
- To report on significant instances of non-compliance to the Audit Committee and the Company's management
- The Compliance Manager also occupies the role of Money Laundering Reporting Officer

The Audit Committee oversees the preparation of the annual 'risk based' Compliance Monitoring Plan and reviews progress against its measures throughout the year.

B.1.2.3: Head of Actuarial Function ("HoAF"), PCF-48:

The Actuarial Function and the role of HoAF are outsourced to Willis Towers Watson. The responsibilities of the HoAF and the Actuarial Function, in line with guidance from the Central Bank of Ireland and the Society of Actuaries, include, but are not limited to, the following matters:

- Coordinating the calculation of the firm's technical provisions
- Assessing the consistency of the internal and external data used in the calculation of technical provisions against the data quality standards as set in Solvency II
- Continuous monitoring of the solvency position of the Company and the required level of statutory reserves
- Reporting on the solvency position of the Company

- The provision of advice and support to the Company on the ORSA process, including the financial consequences of stresses and scenarios and the impact of management actions

B.1.2.4: Head of Internal Audit, PCF-13:

The Head of Internal Audit function is outsourced to Deloitte. The function provides independent and objective assurance services, via a formal outsourcing arrangement in respect of the Company's processes, as carried out by its service providers with due regard to the adequacy of the governance, risk management and internal control framework. The Head of Internal Audit reports to the Audit Committee. The Audit Committee receives and approves the 'risk based' Audit Plan prepared by the Head of Internal Audit.

Internal Audit Reports highlight any significant control failings or weaknesses identified and the impact they have had, or may have and the actions and timings which management have agreed to take to rectify them.

B.1.3 Other Control Functions:

The Company has defined three additional Control Functions:

- Chief Executive Officer, ("CEO"), PCF-8
  The CEO is the only executive director on the Board, PCF-1, and has ultimate responsibility for the Company's compliance. The CEO also occupies the role of Head of Underwriting, PCF-18.
- Finance Manager,
  The Finance Manager occupies the roles of Head of Finance, PCF-11, and Head of Investment, PCF-19.
- Insurance Operations Manager
  The Insurance Operations manager occupies the roles of Chief Operating Officer, PCF-42, and Head of Claims, PCF-43.

B.1.4 Remuneration, Employee Benefits and Practices:

The Company provides a range of benefits to employees, including contractual salary, life cover, permanent health insurance and paid holiday arrangements. Short term benefits, including holiday pay and other similar non-monetary benefits, are recognised as an expense in the period in which the employees render the related service.

The Company pays contributions into a defined benefit pension plan in respect of staff who transferred under Transfer of Undertakings Protection of Employment arrangements from the ILCU to the Company in 2013 and also pays contributions based on a percentage of salary into a defined contribution pension plan on behalf of its remaining employees.

The defined benefit plan is a post-employment benefit plan. It is a multi-employer scheme in which the Company, the ILCU, and individual credit unions participate on an industry-wide basis, (The Irish League of Credit Unions Republic of Ireland Pension Scheme). This is a funded defined benefit scheme with assets managed by the Scheme's trustees.

The defined contribution plan is a post-employment benefit plan under which the Company pays fixed contributions into a separate entity and has no legal or constructive obligation to pay further amounts. The contributions to the defined contribution pension plan are recognised as an expense in the profit and loss account in the periods during which employees render the related service. Amounts not paid are shown in accruals in the balance sheet. The

assets of the plan are held separately from the Company.

Employees contribute additional voluntary contributions to suit their circumstances.

Remuneration of employees that perform activities for any of the Key Control Functions are determined independently of the performance of the business activities they review to avoid any potential conflicts of interest. Remuneration for those persons is weighted in favour of fixed remuneration. Where a variable component exists, it is based on performance against predefined performance criteria.

Remuneration is aligned to the experience, role and performance of the individual, the contribution to the business as a whole, and the overall performance of the Company.

Remuneration packages may include both fixed and variable components. Where fixed and variable components exist these shall be appropriately balanced so that the fixed component represents a sufficiently high proportion of the total remuneration to avoid employees and Directors becoming dependent on the variable component and so as to allow the Company to operate a fully flexible bonus policy (i.e. the ability to pay no bonus if appropriate).

Where a variable component exists, it is subject to a maximum ratio of variable to fixed of 20:80.

Any variable component is based on the performance assessment of each individual, combined with the performance of the Company overall.

B.1.5 Material Transactions:

The ILCU is the parent undertaking of the Company.

The ILCU acts as agent of the Company. The range of services provided and the basis for the fees in respect of such services provided are set out in the Agency and Management Agreement dated 22 March 2013, as amended on 21 November 2014, between the ILCU and the Company.

The fees paid to the ILCU for services provided in accordance with the Agency and Management agreement during 2019 amounted to €2,139,289 (2018: €2,039,126).

Surplus arising in the technical account in a given year, after making adequate provision for technical provisions and any adjustment necessary to meet the Company's economic capital requirements over its planning time-horizon, is returnable to its policyholders (credit unions) by way of a claims experience refund. Such a claims experience refund is calculated based on the combined effect of the underwriting result and investment income in the technical account. An additional calculation is performed to check that the claims experience refund to policyholders would not result in the release of capital required to be retained by the Company in order to meet the Company's economic capital requirements as calculated on a Solvency II basis. The claims experience refund payable to Credit Unions has increased from €5.8m in 2018 to €12.6m in 2019 due to an improvement in underwriting performance and higher investment returns. Although it is probable that the claims experience refund will be paid in

full, any payment to credit unions will be deferred until further information is available on the mortality levels and trends arising from COVID-19 and the impact this will have on the Company.

Directors fees, expenses and emoluments amounted to €378,263 in 2019 (2018: €356,103).

B.2 'Fit and Proper' Requirements

The Company has adopted a Fitness and Probity Policy, which sets out the due diligence checks that must be performed in the following areas and which aligns with the Central Bank of Ireland's Guidance on Fitness and Probity Standards 2014. These include:

- Identification
- Compliance with the minimum competency code, where relevant
- Professional qualification(s)
- Continuous Professional Development
- Interview and application
- References
- Record of previous experience
- Record of experience gained outside the State
- Concurrent Responsibilities
- Individual Questionnaire

As part of the recruitment process for a PCF or CF role, a candidate is assessed to determine whether he/she is deemed Fit for the particular role. When assessing the fitness of a person, the Company considers the candidate's professional competence in terms of management (management competence) and in the relevant area of the business activities (technical competence) and specifically, where required, that the CBI's Minimum Competency Code for the role are met.

When assessing the knowledge, competence and experience required to perform a particular function, the qualifications and experience of the existing Board, Senior Management Team and other employees within the Company are taken into account when considering a new appointment.

The collective knowledge, competence and experience of the Board and Senior Management Team include:

- Market knowledge;
- Business strategy and business model;
- System of governance;
- Financial and actuarial analysis; and,
- Regulatory framework and requirements.

The Company considers information about a candidate's competency and capability for a role. This includes the following:

- The requirements of the role;
- The candidate's demonstrated capacity to successfully undertake the responsibilities of the role and the establishment/maintenance of an effective control regime;
- The candidate's knowledge of the business; and
- The candidate's relevant formal / informal training and professional qualifications.

As part of the recruitment process, a candidate is assessed to determine whether he/she is deemed Proper for the particular role, specifically with reference to honesty, integrity, fairness, ethical behaviour and financial soundness.

The characteristic of independence is a particular requirement of the role of director.

When assessing the probity of a person, the conviction of a relevant criminal offence, disciplinary or administrative offence shall be taken into consideration.

The company considers ongoing judicial proceedings, current investigations and/or enforcement actions. Any imposition of administrative sanctions for non-compliance (by regulatory or professional bodies) with any financial services legislation are also taken into account when assessing the probity of a person.

A candidate's record is considered a good indicator of character, as well as other information indicative of honesty, integrity, fairness and ethical behaviour.

When determining financial soundness, the company considers whether a candidate has been declared bankrupt, is involved in ongoing bankruptcy proceedings or is associated with an insolvent entity.

The Company considers that a person who has been convicted of fraud, money laundering, theft, financial crime or a tax offence may be ineligible to occupy a PCF role. Such instances of ineligibility shall be determined by the board.

For certain Control Functions (referred to as Pre-approved Control Functions or "PCFs"), approval from the Company's regulator is required prior to appointment by the Company's Board. Members of the Board are all PCF functions as are all of the key Control Functions described earlier. PCF role holders attest annually to the Company in respect of their continuing fitness and probity.

B.3 Risk Management System including the ORSA

The Company's Enterprise Risk Management (ERM) framework has been developed to enable the Board and management to understand and appropriately manage and mitigate the risks associated with the Company's objectives over the short, medium and longer term together with the overall level of risk embedded within functional and operational processes and activities, including those which are the subject of outsourcing arrangements.

The Risk Committee receives regular reporting from the Company's Chief Risk Officer in relation to the outcome of the periodic risk assessments undertaken by management in line with the ERM framework.

The main policy objectives of the ERM framework are:

(a) Performance objectives: the efficiency and effectiveness of activities, use of assets and other resources and protecting the Company from loss. The ERM framework seeks to ensure that personnel, including those providing services on an outsourced basis, are working to achieve business objectives with efficiency and integrity, without unintended or excessive cost, or placing other interests before those of the Company.

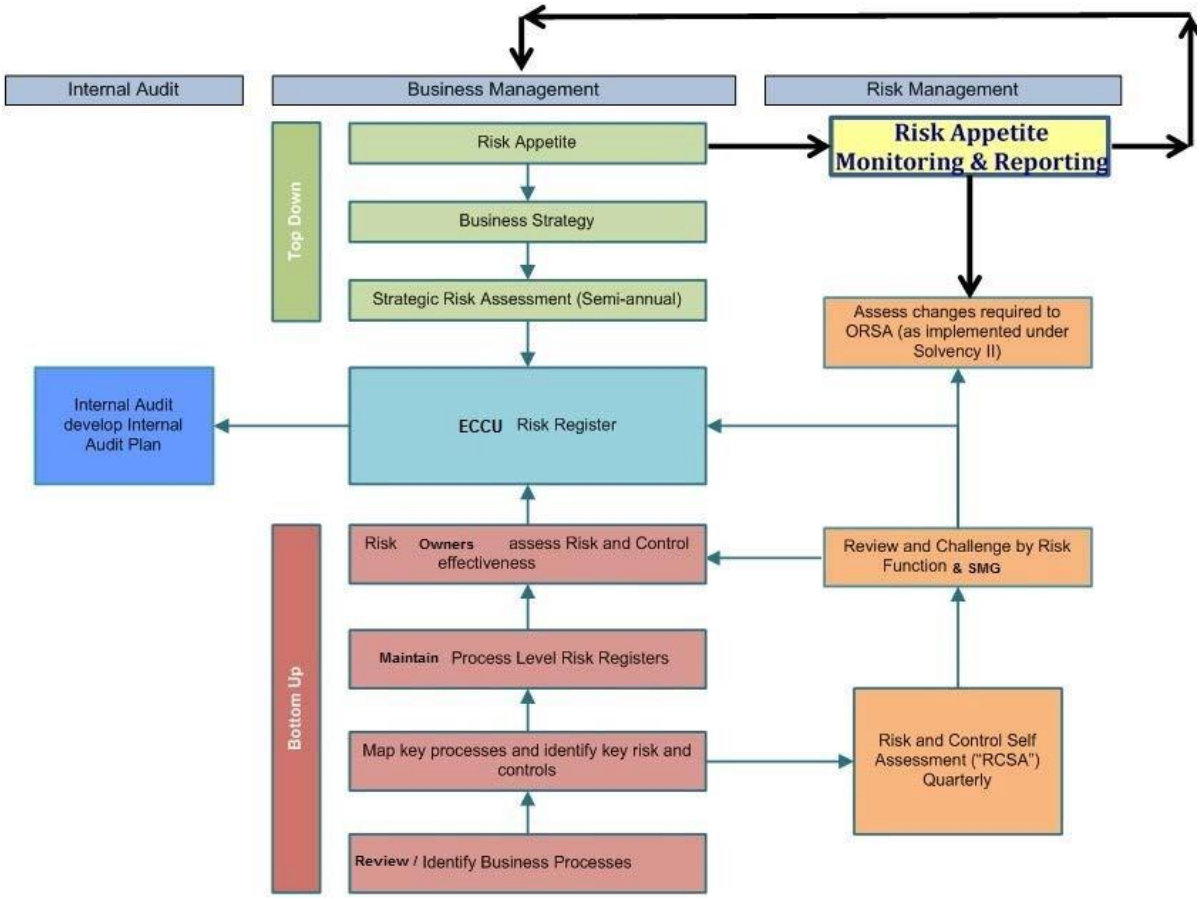
(b) Information Objectives: the preparation and provision of timely, reliable and relevant reports needed for substantive, informed decision-making. Information objectives also address the need for reliable annual accounts, financial statements and other financial-related disclosures; reports to external parties and stakeholders. The ERM framework seeks to ensure the information received by management, the Board of Directors, Shareholders and regulators is of sufficient quality and integrity that recipients can rely on the information in making decisions.

(c) Compliance Objectives: the ERM framework seeks to ensure that all organisational activities and outputs comply with applicable laws and regulations, supervisory requirements and internal policies and procedures.

The result is a risk management strategy, which is led by the Board whilst being embedded in the Company's business systems, strategy and policy setting processes and the normal working routines and activities of the Company. Consequently risk management is an intrinsic part of the way business is conducted and allows the Company to respond quickly to evolving risks, which may arise internally or externally.

The ERM framework is intended to reduce, but cannot eliminate the range of possibilities, which might cause detriment to the Company. Similarly the ERM Framework cannot provide protection with certainty against any failure of the Company to meet its business objectives, or guard against material errors, losses, fraud, or breaches of laws and regulations. Taking all of these factors into account the ERM Framework is intended to provide reasonable assurance that the Company will conduct its business in an orderly and legitimate manner on a continuing basis and that reasonably foreseeable circumstances will not prevent the Company from achieving its business objectives.

The Risk Management Framework within ECCU comprises a multi-phased cyclical process of monitoring, review, reporting and management of risks employing a "Bottom Up" and "Top Down" approach so as to inform the SMT, the Risk Sub-Committee of the Board, the Board and the ORSA process towards achieving the appropriate capitalisation of the undertaking in respect of its risk exposures.



The SMT heads of function define and document the key processes of their areas of responsibility, to include identification of associated risks and their respective control owners.

The key processes are periodically reviewed and refinements documented. Associated movements in the process risks and controls are identified and documented. This forms the basis of the process oriented risk registers.

At least annually all Risk and Control Owners assess the following processes and update the process oriented risk register to reflect new and emerging risks:

- Investment Management;
- Product Pricing and Underwriting;
- Finance and Actuarial;
- Support Services (HR, Legal);
- Reinsurance;
- Premiums / Collections / Policy Admin / Claims and;
- Information Technology

The Risk Owners review existing process level risk registers for completeness and accuracy and make such updates as may be required.

For each risk identified, the Risk Owners assess the impact, should the risk occur, and assign a RED, AMBER or GREEN status to reflect outside, within but requiring active monitoring, or

absolutely within tolerance requiring no further action, respectively.

Risk Owners also assess the effectiveness of controls to mitigate the risk.

The Risk Owners within ECCU perform a quarterly Risk and Control Self-Assessment, ("RCSA"), and submit movements identified to the SMT and CRO for review and challenge.

The CRO may perform an independent review and challenge of any RCSA based on his/her knowledge of the business, internal audit, external audit review or compliance monitoring programme findings.

The CRO reports on RCSA findings to each meeting of the Risk Committee in a "Risk Report" to include the current Risk Dashboard, summarising the current status of the respective Risk Categories in accordance with the Taxonomy of Risk, as defined in the Company's Risk Management Policy.

The Risk Committee reviews the risk dashboard, to include the strategic risks that affect ECCU at its meetings, at least quarterly, and considers recommending such amendment to strategy, ORSA and capital requirements as may be required. All decisions of the Risk Sub-Committee, in this regard, shall be recorded in the minutes and communicated to the Board at the earliest opportunity.

The Risk Committee reviews and assesses the strategic risks that affect ECCU at least annually during the course of its scheduled meetings.

The CRO reports to the Risk Committee on material risk incidents.

Material risk incidents are events which could impair the Company's integrity, leading to material damage to its reputation, legal or regulatory sanction, or financial loss, as a result of a failure, or perceived failure, to comply with all applicable laws, regulations and internal standards.

Risk incidents are reported to the CRO if they breach or are likely to breach ECCU's Risk Appetite.

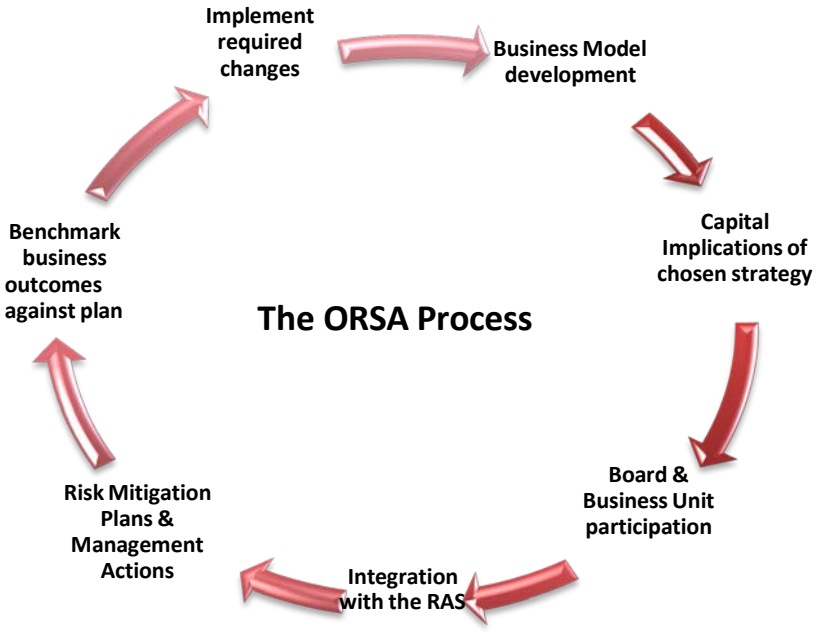
The CRO reports material risk incidents that breach or have the potential to breach risk appetite, to the Risk Committee, in accordance with the provisions of the approved Risk Appetite Statement. The SMT advises on specific remedial actions or options available, as agreed with the CRO, to address the particular circumstances prevailing in order to resolve the breach and remove the potential for such to occur.

Own Risk Solvency Assessment ("ORSA")

Every year, and on an ad-hoc basis should circumstances materially change, the Company conducts an ORSA. The objective of the ORSA process is to enable the Board to assess its capital adequacy in the light of its assessments of its risks and the potential impacts of its risk environment, and enable it to make appropriate strategic decisions. The Board requires that the ORSA process produces meaningful reports on the adequacy of the Company's capital and risk sensitivities that can be used in shaping strategy and risk appetite.

The ORSA process is a circular process that relies on key elements of the business:

- Board strategy, policies and plans;
- The Solvency II Pillar 1 Balance Sheet standard formula results, and base assumptions used;
- The ERM process and its outputs, which identifies the key risks;
- The Board reviews, challenges and approves the test scenarios and ORSA output;
- The Actuarial Function that runs the tests on the Balance Sheet, for capital adequacy and produces the resultant outputs;
- The Risk Function, Actuarial Function and SMT which assess the outputs and prepare the reports;
- The Risk Committee and Board's assessment of the output and resultant capital, strategy and risk appetite review;
- ORSA Reporting to the Company's regulator, the Central Bank of Ireland.



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

The results and conclusions contained in the ORSA Report and the Board's resultant actions and decisions, are communicated to all relevant staff, including outsourced control functions, once the report has been considered and approved by the Board.

The Company determined that the Solvency II standard formula be used to calculate the required solvency capital and to assess the overall solvency needs. A five year base case projection of the Solvency II Balance Sheets and Solvency Capital Requirements ("SCR") position is produced using the standard formula. The results are subjected to a range of scenario testing that is reviewed by management and by the Board and, where appropriate, potential management actions are noted and conclusions drawn.

Assessments to date indicate that, under the scenarios presented by management to the Board, the Company is adequately capitalised.

B.4 Internal Control System

The Internal Control Framework for the Company has four elements:

(a) Board-level Controls - the Board Charter, policies, reports and minutes of Board and Board sub-Committee meetings form the principal framework, within which the Board operates. The control environment and 'tone at the top' are influenced significantly by the Board and its Audit and Risk Sub-Committees. Independence, membership, scrutiny of activities, and appropriateness of actions of both the Board and the sub- committees have a significant influence on the control environment.

(b) The Senior Management Team, performing the executive functions of the business. Led by the CEO, the SMT plays a key role in determining the corporate culture of the Company and in setting the 'tone at the top'. The SMT communicates behavioural standards both formally and informally and a Compliance Manual is made available to all employees. All employees are required to review and sign up to the Compliance Manual on an annual basis.

(c) Independent Control Functions – Risk, Compliance and Head of Actuarial Functions.

The Company has established and embedded a Risk Function that is proportionate to the nature, scale and complexity of its business.

The responsibilities of the Risk Function include oversight activities such as:

- Evaluating the design and effectiveness of the Risk Management System,("RMS"), to identify, measure, monitor, manage and report risks

(including emerging risks) to which the Company is exposed and reporting the findings to the Risk Committee regularly and to the Board periodically, as defined in the RMS;

- Identifying any shortcomings and making recommendations on how deficiencies can be remediated;
- Providing and maintaining a comprehensive and objective representation of the Company's risk profile and suggesting actions to manage these risks appropriately;
- Monitoring the Risk Management System and ensuring appropriate implementation of risk policies;
- Reporting to the Risk Committee on details of risk exposures including providing information on the outcome of the ORSA;
- Reporting to the Risk Committee on specific areas of risk inter alia according to requests from the Risk Committee; and
- Advising the Board periodically, and the Risk Committee regularly, on strategic risks.

ECCU strives to establish and embed a Compliance Function that is proportionate to the nature, scale and complexity of the business.

The responsibilities of the Compliance Function include oversight activities such as:

- Identifying, assessing, monitoring and reporting the compliance risk exposure of the Company to the Audit Committee, focusing on compliance with applicable laws and regulatory requirements;
- Designing guidelines and procedures for staff in relation to compliance matters;
- Enhancing staff awareness and providing training on compliance matters as required;
- Recording of incidents that must be reported and ensuring the Company fulfils its obligations of notification to third parties (e.g. external auditors, and the CBI);
- Investigating and following up potential violations of the law and regulations;
- Advising on new products, services and markets from a compliance perspective;
- Monitoring projected revisions of legislation and plans to introduce new regulation and assessing the potential impact on the Company; and
- Reporting to the Audit Committee on compliance issues.

The Compliance Function operates with organisational authority and operational autonomy and conducts compliance activities from the annual plan approved by the Audit Committee.

The Head of the Actuarial Function is a key source of expertise on actuarial matters for the Board. The individual is accountable to the Board. The HoAF provides guidance to the Board on the selection of key actuarial assumptions and influences Board decisions in key areas of actuarial expertise. The HoAF also drives risk awareness and an appropriate risk culture within the undertaking.

(d) Controls over Outsourced Activities – documented outsourcing agreements and Service Level Agreements ("SLAs") set out the terms of the arrangement and the relationship between the Company and its outsourced providers. Conformance by the outsourced service supplier to these agreements is monitored by a business owner within the Company who reports, by exception, to the CRO and to the Audit Committee and the Board as required.

Internal control is, to a varying degree, the responsibility of everyone within the Company and is therefore an explicit or implicit part of everyone's job description. All staff produce information used in the Internal Control System and / or perform control actions.

All areas of the business have a responsibility to inform the Internal Audit Function, CEO, CRO and Compliance Manager of deficiencies in controls, losses that are sustained, or a definite suspicion concerning irregularities.

A number of external parties contribute to achievement of ECCU's objectives as outsourced service providers.

Control of outsourced activities is provided for through the effective monitoring of the processes of the outsourced service provider. The CEO, as business owner, is responsible for ensuring the appropriateness of control activities at outsourced providers.

B.5 Internal Audit Function

The Head of Internal Audit, through planned reviews of the Company's processes and those of its service providers, provides an opinion on the internal control framework of the Company's business. Internal Audit plays an important role in evaluating the effectiveness of control systems and contributes to increased effectiveness through the identification of weaknesses and provision of recommendations for improvement. Due to the nature and scale of the Company's activities, the Internal Audit Function has been outsourced, presently, to Deloitte.

The Internal Audit Function is an independent function which examines and evaluates the functioning of the internal controls and all other elements of the system of governance.

It also assesses the compliance of activities with internal strategies, policies, processes and reporting procedures.

The Internal Audit Function develops an annual Internal Audit Plan for Audit Committee approval based on the key risks identified and assessed through the Risk Management System. Every activity (including activities performed by outsourced service providers) is within scope and is considered in the design of the Internal Audit Plan.

The Internal Audit Function performs its activities with objectivity and independence.

The Internal Audit Function produces written reports to the Audit Committee. The report covers any deficiencies with regard to the efficiency and suitability of the Internal Control System, as well as major shortcomings regarding compliance with internal policies, procedures and processes. It also includes recommendations on how to remedy inadequacies and specifically addresses how past recommendations have been implemented.

ECCU's Internal Audit Function's performance is assessed every 3 three years by the Board.

B.6 Actuarial Function

The Actuarial Function of the Company is outsourced to Willis Towers Watson in accordance with a statement of work approved by the Board in October 2017. Willis Towers Watson reports to the Board at least annually and also attends Board meetings. Willis Towers Watson can draw upon a range of resources to carry out the necessary tasks.

The key responsibilities of the Actuarial Function, ("AF"), and Head of Actuarial function, ("HoAF"), are defined in the Reserving Policy and in summary are:

- The AF must coordinate the calculation of technical provisions. The AF will report to CEO and Finance Manager every quarter on the results of this calculation.
- The AF must ensure the appropriateness of the methodologies and underlying models used as well as the assumptions made in the calculation of technical provisions.
- The AF must assess the sufficiency and quality of the data used in the calculation of technical provisions.
- The AF must inform the administrative, management or supervisory body of the reliability and adequacy of the calculation of technical provisions.
- The CBI's Domestic Actuarial Regime requires the HoAF to provide an Actuarial Opinion on Technical Provisions, ("AOTP"), to the Central Bank of Ireland and an Actuarial Report on Technical Provisions, ("ARTP"), to the Board on an annual basis.
- Providing an opinion on the Company's underwriting policy
- Providing an opinion on the adequacy of the Company's reinsurance arrangements

In addition the Actuarial Function contributes to the ORSA process, to include providing an opinion to the Board, and carries out other calculations for ECCU including pricing and scenario projections.

B.7 Outsourcing

The Company is wholly owned by the ILCU, an unincorporated association of credit unions which exists to represent and service affiliated credit unions on the island of Ireland. The Company outsources a number of functions to the ILCU, with whom it shares a business premises, which undertakes these activities on its behalf in Ireland under an Agency and Management Agreement with respective SLAs.

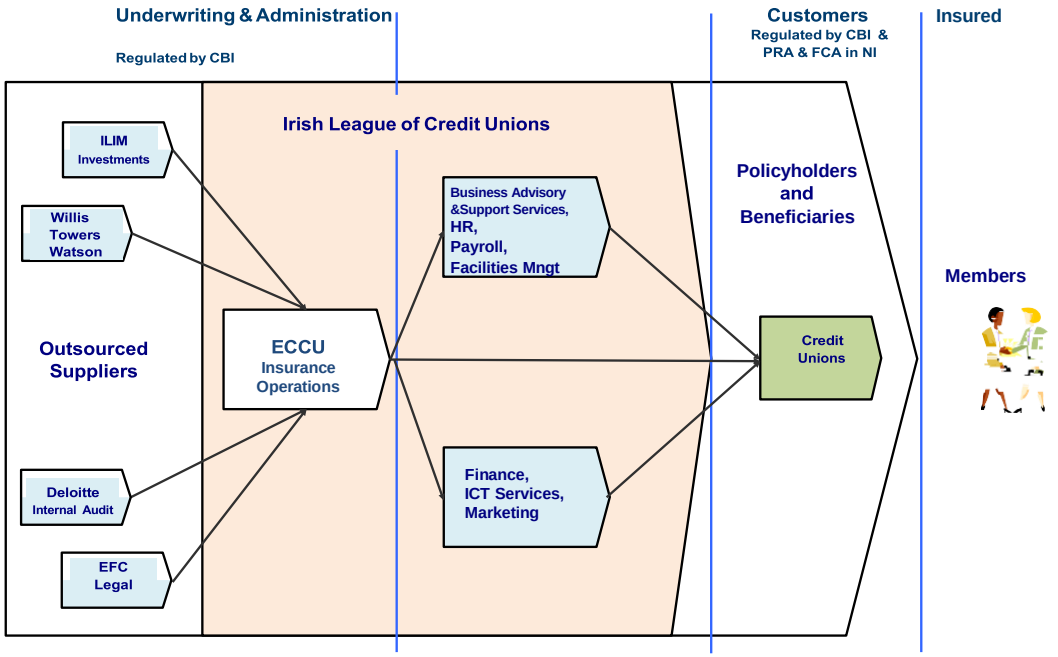
An arrangement of any form between the Company and an outsourced service provider by which that service provider performs a process, a service or activity which would otherwise be performed by the Company itself and which is essential to its operations, without which it would be unable to deliver its services to policyholders, is considered to be the outsourcing of a critical activity. The Company outsources the following critical activities, which are carried out in Ireland, to Irish resident service providers with proven competence in their respective fields, in accordance with its Board approved policy:-

- Internal Audit Function, provided by Deloitte, in respect of which the relevant Business Owner is the Finance Manager;
- Head of Actuarial Function, provided by Willis Towers Watson, in respect of which the relevant Business Owner is the CEO; and

- Investment Management, provided by Irish Life Investment Managers, in respect of which the relevant Business Owner is the Finance Manager.

In addition, other non-critical functions, e.g. document storage, shredding etc, are also outsourced by the Company.

ECCU Business Model & Outsourcing Relationships



Potential new Outsourcing arrangements are subject to the following procedural stages:

1. Pre-outsource actions;
2. Consideration of impact of outsourcing (risk management);
3. Due diligence;
4. Written agreement including SLAs and;
5. Monitoring

Other areas for consideration shall include contingency planning, exit strategies and internal outsourcing.

Pre-outsource actions

At an early stage in the process a Business Owner is made responsible for the outsourced activity by the Board. The Business Owner shall be adequately experienced and competent and shall be responsible for:

- Negotiating and managing the relationship and procurement processes, conducting fee negotiations within the parameters set by the Board, defining services and developing SLAs;
- Monitoring ongoing compliance with regulations and SLAs;
- Ensuring overall service requirements have been adequately specified and documented;

- Reviewing the need for, extent and adequacy of any guarantees or indemnities provided by or on behalf of the outsourced service provider and;
- Making preparations for the smooth transition of operations to the outsourced service provider by assessing the impact of the transfer on current and new operations. This includes developing contingency plans in the event that problems occur during the transfer to the outsourced service provider to ensure that business continuity expectations can be met at all times.

Consideration of the impact of outsourcing - risk management
The Company does not intend to significantly increase risk exposures as a result of outsourcing. This is achieved by:

- Establishing mechanisms to provide reasonable protection from financial or operational loss as a result of failed or inappropriate outsourcing arrangements. This will be achieved through the effective implementation of policy and the enforcement of outsourcing agreements and SLAs;
- Ensuring that all outsourcing arrangements are in the best interests of the Company and;
- Meeting, at a minimum, current legislation, regulatory requirements, and working practices in accordance with the Company's business objectives.

A risk examination shall allow the Company to understand the main risks that may arise from the outsourcing, identify the most suitable strategies for the mitigation of these risks and ensure that the outsourced service provider has the ability and authorisation required by law to perform the outsourced activities reliably and professionally.

Outsourcing activities are monitored in a way that will allow management to make sound quantitative estimates of operational risk capital.
To ensure that the outsourcing of any critical activity does not lead to a material impairment of the quality of ECCU's governance system:

- The Business Owner ensures that the outsourced service provider has adequate Risk Management and Internal Control Systems in place and;
- The outsourced activities shall be adequately addressed within ECCU's Risk Management and Internal Control Systems.

In order to safeguard against an undue increase in operational risk when outsourcing a critical activity, the Business Owner:

- Verifies that the outsourced service provider has adequate financial resources to take on the tasks the Company plans to transfer and to properly and reliably discharge its duties;
- Verifies that the staff of the outsourced service provider are selected on the basis of criteria that give reasonable assurance that they are sufficiently qualified and reliable;
- Verifies that the outsourced service provider properly isolates and identifies the information, documentation and assets belonging to the Company and its clients in order to protect their confidentiality and;
- Makes sure the outsourced service provider has adequate contingency plans in

place to deal with emergency situations or business disruptions and has periodic testing of backup facilities, where necessary, having regard to the activity outsourced.

When selecting an outsourced service provider, the Board ensures that outsourcing is not undertaken in such a way as to lead to any of the following:

- A material impairment in the quality of the Company's system of governance;
- An undue increase in the Company's operational risk;
- An impairment in the ability of the Central Bank of Ireland to monitor the Company's compliance with its obligations and;
- Disruption to the continuous and satisfactory service to policyholders.

Outsourced service provider due diligence
When choosing a suitable outsourced service provider, the Business Owner carries out the necessary steps to ensure that:

- An examination is performed of the potential outsourced service provider's ability and capacity to deliver the required functions or activities satisfactorily, taking into account the Company's objectives and needs;
- The outsourced service provider has adopted all means to ensure that no explicit or potential conflicts of interest with the Company exist;
- Persons at the outsourced service provider responsible for Control Functions comply with the Fit and Proper requirements of the Central Bank of Ireland;
- The Company enters into a written agreement with the outsourced service provider which clearly allocates the respective rights and obligations of each party;
- The general terms and conditions of the outsourcing agreement are authorised by the Board;
- The outsourcing agreement does not represent a breach of any data protection regulation or other laws; and
- The outsourced service provider is subject to the same provisions that are applicable to the Company regarding the safety and confidentiality of information relating to clients.

Outsourced service provider written agreement
An outsourcing agreement is prepared by the Company which includes, inter alia, the following:

- A description of the scope of the agreement and services provided;
- The commencement date and end date;
- The review date of the agreement;
- The pricing and fee structure;
- The duties and responsibilities of both parties involved;
- The performance monitoring provisions including the terms of use of SLAs;
- A mechanism which will allow recourse to or a penalty against the outsourced service provider for non-performance of their duties and failure to meet service levels under the SLA;
- The contingency and disaster recovery plans to be implemented at the outsourced service provider to ensure continuation of service;

- The outsourced service provider's commitment to comply with all applicable laws, regulatory requirements and guidelines and to cooperate with the CBI in connection with outsourced activities;
- A provision that the outsourced service provider discloses any developments that may have a material impact on its ability to carry out the outsourcing, including any material changes to its financial resources or risk profile;
- A provision that the outsourced service provider is required to maintain an adequate risk and internal control system and provide reasonable evidence and/or assurance upon request by ECCU;
- A provision that the outsourced service provider can only terminate the contract with a notice period sufficiently long to enable ECCU to find an alternative solution;
- A provision that ECCU reserves the right to information about the outsourced activities and the outsourced service provider's performance;
- A provision that the outsourced service provider shall protect any confidential information relating to ECCU and its clients;
- A provision that ECCU, its external auditor and the CBI shall have effective access to all information related to the outsourced functions or activities, as well as to the outsourced service provider's business premises if an on-site inspection or audit is to be performed;
- A provision that the Board has the right to directly address questions to the outsourced service provider.

Provisions for termination are included in the written outsourcing agreement. Non-compliance with any of the requirements outlined within the outsourcing agreement shall be cause for the termination of the outsourcing contract at the discretion of the Company.

Outsourcing agreements include the provision that it is the responsibility of the outsourced service provider to cooperate with the Company and the Central Bank of Ireland in connection with the outsourced activities and to allow the Financial Regulator access to data related to the outsourced function.

Management and monitoring of the outsourced service provider
The CEO has responsibility for all outsourcing activity.

The CEO has day to day responsibility for managing and monitoring all outsourcing activity as delegated by the Board.

The CEO assesses the impact of outsourcing on the risk profile of the Company on an individual and aggregated basis.

Each outsourced function is managed in accordance with the following minimum standards:

- A Business Owner is responsible for managing and monitoring the arrangement and for reporting to the CEO;
- The Business Owner has appropriate technical knowledge and authority to manage the outsourced arrangement;
- The Business Owner draws upon the resources of the Company, as needed, to assist with any functional area of expertise;
- The Business Owner maintains appropriate levels of contact with the outsourced service provider;

- The Business Owner formally monitors compliance with SLAs and Key Performance Indicators ("KPIs") on a quarterly basis and reports areas of non-compliance to the CEO; and
- The Company ensures that where non-compliance with outsource agreements or SLAs is identified, appropriate action to rectify the non-compliance is taken.

Contingency Plans and Exit Strategy
Contingency and disaster recovery plans are included in all outsourcing agreements to ensure continuity of service to ECCU through any business interruption event which may arise in the supply of outsourced services to ECCU.

The Business Owner ensures that appropriate contingencies and disaster recovery plans have been implemented at the outsourced service provider.

Provisions are included in all relevant outsourcing agreements for the right to terminate the contract where the outsourced service provider is non-compliant with pre-defined SLAs.

The Business Owner develops an exit strategy, to include the identification of potential alternative suppliers in the market, to address the potential risks that may arise in the event that the termination of an outsourced agreement is to be contemplated.

B.8 Any Other Information

The Company has assessed the adequacy of its system of governance and has concluded that it effectively provides for the sound and prudent management of the undertaking, being proportionate to the nature, scale and complexity of the risks inherent in its business. In reaching this conclusion the Board has the benefit of consideration of rolling internal audit reviews of the discrete elements of the system of governance over many years.

C: Risk Profile

Risk Management Objectives and Risk Policies
The Company's objective in the management of financial risk is to minimise, where practicable, its exposure to such risk, except when necessary to support other objectives.

Overall responsibility for the management of the Company's exposure to risk is vested in the Board. To support it in this role, an enterprise risk management framework is in place comprising risk identification, risk assessment, control and reporting processes. Additionally, the Board has established a number of Committees with defined terms of reference. These are the Audit, Risk and Remuneration Committees.

The more significant financial risks to which the Company is exposed are set out below. For each category of risk, the Company has determined its risk appetite and the SMT manages and monitors performance of the Company within the parameters set out in the Board's Risk Appetite Framework.

C.1 Underwriting Risk

Underwriting Risk refers to the risk of loss, or of adverse change in the value of insurance liabilities, due to inadequate pricing and/or reserving assumptions which includes the fluctuations in the timing, frequency and severity of insured events, relative to the expectations of the Company at the time of underwriting.

The Company's underwriting strategy is to supply renewable term cover to affiliated credit unions of ILCU within regulatory approved classes of Insurance in accordance with the Company's Risk Appetite Framework.

As a life insurance company, the Company is subject primarily to mortality risk. Reinsurance arrangements are in place to cover a proportion of the sums at risk in the event of a claim. The reinsurance cover is designed to protect ECCU against large individual claims and also against significant adverse underwriting experience (such as might arise if there was a mortality pandemic).

The Company provides monthly renewable loan protection and life savings cover for all credit unions affiliated to the ILCU on a group policy basis. The insured lives are members of those credit unions affiliated to the ILCU across the island of Ireland. As a result, concentration is minimised as the spread of credit unions is diversified in terms of geographic, demographic, and socio-economic risk exposure.

An increase in the mortality rate would lead to an increase in the outstanding claims reserve. An increase of 10% in the mortality rate would lead to an increase in Best Estimate Liability of €2.2m (2018: €2.3m).

The Company's technical provisions are also sensitive to changes in claims reporting and payment patterns. An increase in lags (between date claim incurred and date paid) would lead to an increase in the Best Estimate Liability, as more outstanding claims would be expected to materialise. An increase in lags of one month would, if all other assumptions remain unchanged, lead to an increase in Best Estimate Liability for claims outstanding of €5.8m (2018: €6.0m).

There were no material changes in underwriting risk profile over 2019.

C.2 Market Risk

Market risk is the risk of adverse financial impact as a consequence of market movements such as currency exchange rates, interest rates, and other price changes. Market risk arises due to fluctuations in both the value of assets held and the value of liabilities. The objective of the Company in managing its market risk is to ensure risk is managed in line with the Company's risk appetite framework.

The Company's risk management objectives in order to minimise its exposure to market risk in line with the overall risk appetite framework are:

- To adopt a conservative approach to investments and seek to safeguard the assets of shareholders;
- Hold sufficient investment values and investment liquidity to ensure all liabilities are met as they fall due;
- Ensure that there are appropriate policies and strategies in place for liquidity risk management, concentration risk management, counterparty risk management, and asset liability risk management to meet this objective; and
- Manage investment assets in accordance with the prudent person principle.

Application of the Prudent Person Principle

The Company adopts a conservative approach to investments and seeks to safeguard the assets of the Company. The majority of the Company's investment assets are managed by an external investment manager (ILIM) in accordance with a conservative investment mandate set by the Board.

The concentration risk limits and thresholds within the managed investment portfolio are required to be reviewed by the SMT and the Board of ECCU at least annually. Any changes to the limits require the approval of the Board.

On breach of any Concentration Risk limits, the investment manager will inform the Finance Manager of the breach and the corrective action taken to remedy the breach.

ECCU's Board approved asset classes consist of the following:

Asset Class	Tolerance Range (as % of portfolio)
Cash (consisting of deposits and Eurozone government treasury (T-bills) with a duration of < 24 months)	Between 30% and 40%
Cash with any one credit institution	No more than €5 million (£Stg4.5m)
Eurozone government-backed bonds, minimum credit rating investment grade 0-5 Years	Between 20% and 30%
Eurozone government-backed bonds, minimum credit rating investment grade >5 Years	Between 15% and 25%
Equity – ILIM Indexed Global Equity Fund Hedged C Share Class (IM05C)	Between 0% and 20%
Irish Infrastructure Fund, Absolute Alpha* & ILIM Property Fund*	Between 0% and 15%

*Investment in the Absolute Alpha Fund is being moved to the ILIM Property Fund

ECCU has a minimal appetite for asset and liability mismatch and attempts to match assets and liabilities over the short and medium term horizons according to duration and currency. ECCU matches its assets based on a prudent assessment of its liabilities and invests the remaining surplus assets in line with the "Investment Mandate" which has been approved by the ECCU Board. Surplus assets are invested prudently with an emphasis on security, continuity of income and diversity of assets.

The asset and liability mismatch is analysed for efficiency and effectiveness and to ensure there are appropriate assets to back the liabilities on an ongoing basis. The Actuarial Function performs stress testing on Asset Liability Management mismatch on a quarterly basis to ensure it has sufficient assets to cover liabilities.

A sovereign default and/or bank default are examples of events that could impact on the value of the investments backing policyholder liabilities and hence the interest of policyholders.

ECCU does not engage in non-routine investment activities.

The Board must approve ECCU entering into any agreement which requires the use of derivatives, asset backed securities, or collateralised debt obligations or gearing. ECCU currently does not invest directly in any complex financial instruments and should it ever do so the Board would ensure that ECCU had access to appropriate expertise to understand, monitor and manage these products. The ECCU Board has approved an investment, managed by ILIM, in an Absolute Alpha Fund, a collective investment scheme which can, as with the equity fund, use hedge fund-like strategies for the purpose of efficient portfolio management in order to help meet the fund's objectives.

ECCU evaluates all investments according to Solvency II valuation principles. ECCU does not solely rely on any valuation provided by financial institutions or similar third parties. The performance of the external investment manager is reviewed on an annual basis.

The Finance Manager is responsible for the continuous management and monitoring of ECCU's liquidity position. The short term (less than 1 year) liquidity position is monitored by projecting rolling monthly net cash flows by currency. The effect of managing and monitoring ECCU's liquidity position is to reduce the likelihood of breaching the risk limits as specified in the Risk Appetite Statement.

Given the nature of ECCU's business (monthly renewable term assurance) there is currently no requirement for a long-term liquidity strategy. It is expected that the business could be wound down within one year in the event of closure to new business.

In the event of Risk Appetite limit breaches, SMT have an escalation schedule in place to record the breach, the corrective action taken and the timely reporting of the breach where required to the Risk Committee, the Board and the CBI as specified and defined in the "Risk Appetite Framework".

Currency risk

Currency risk arises when obligations an entity has promised to fulfil (liabilities) are in a different currency from the assets it holds to cover those liabilities. The Company undertakes certain transactions denominated in foreign currencies hence exposures to exchange rate fluctuations can arise.

The Company has minimal exposure to currency risk as the Company's financial assets are primarily matched to the same currencies as its insurance contract liabilities.

Carrying amounts of the Company's foreign currency denominated assets and liabilities:

	2019 € GBP	2018 € GBP
Assets	10,800,174	8,616,287
Liabilities	(6,571,787)	(4,683,332)
	4,228,387	3,932,955

The following table details the Company's sensitivity to a 10% increase (appreciation) and decrease (depreciation) in the Euro against GBP. For each sensitivity the impact of change in a single factor is shown, with other assumptions unchanged.

	2019 €	2018 €
10% increase		
Pre tax profit	(303,681)	(316,783)
Shareholders' equity	(265,721)	(277,185)
10% decrease		
Pre tax profit	303,681	316,783
Shareholders' equity	265,721	277,185

The Company's method for sensitivity to currency rate fluctuations has not changed significantly over the financial year.

Interest rate risk
Interest rate risk is the risk that the value of future cash flows of a financial instrument will fluctuate because of changes in market interest rates.

The Company is exposed to interest rate risk as it invests in government bonds. These assets are managed by an external investment manager in accordance with a conservative investment mandate.

The following table details the Company's sensitivity to a 1% increase and decrease in interest rates. For each sensitivity the impact of change in a single factor is shown, with other assumptions unchanged.

	2019 €	2018 €
1% increase		
Pre tax profit	(1,644,655)	(1,554,700)
Shareholders' equity	(1,439,073)	(1,360,363)
1% decrease		
Pre tax profit	1,902,258	1,797,100
Shareholders' equity	1,664,476	1,572,463

The Company's method for sensitivity to interest rate fluctuations has not changed significantly over the financial year.

Price risk
The Company is exposed to price risk arising from fluctuations in the value of financial instruments as a result of changes in the market prices and risks inherent in all investments.

The Company has no significant concentration of price risk. The risk is managed by the Company maintaining an appropriate mix of financial instruments and adopting a conservative investment policy.

The Company's sensitivity to a 10% increase and decrease in market prices is as follows:

	2019 €	2018 €
10% increase		
Movement in fair value of shares and other variable yield securities in unit trusts	2,107,601	1,793,619
Movement in fair value of debt securities and other fixed income securities	2,541,144	2,404,553
10% decrease		
Movement in fair value of shares and other variable yield securities in unit trusts	(2,107,601)	(1,793,619)
Movement in fair value of debt securities and other fixed income securities	(2,541,144)	(2,404,553)

The Company's method for sensitivity to price risk fluctuations has not changed significantly over the financial year.

C.3 Credit Risk
Credit risk refers to the risk that a counterparty will default on its contractual obligations resulting in financial loss to the Company. The key areas of exposure to credit risk for the Company are in relation to the following:

- The Company is exposed to reinsurance counterparty risk, being the risk

associated with losses from the reinsurer being unable to pay reinsurance claims;
- The Company is exposed to credit risk on third parties where debt securities are held; and
- The Company is exposed to credit risk where it places funds on deposit with credit institutions.

The objective of the Company in managing its credit risk is to ensure risk is managed in line with the Company's risk appetite framework. The Company has established policies and procedures in order to manage credit risk and methods to measure it.

The Company monitors the credit risk in relation to its reinsurance arrangement and investment portfolio by monitoring external credit ratings for the reinsurer and investments held by the Company on a monthly basis. The Company also maintains an appropriate mix of financial instruments and adopts a conservative investment policy.

There were no changes in the Company's credit risk exposure in the financial year nor to the objectives, policies, and processes for managing credit risk.

The following table shows aggregated credit risk exposure:

	2019 € AAA – AA+	**2019 € AA – A-**	**2019 € BBB+ – BBB-**	**2019 € Not Rated**	**2019 € Total**
Debt securities and other fixed income securities	5,846,372	9,341,935	10,452,471	-	25,640,778
Shares and other variable yield securities and units in unit trusts	-	-	-	21,076,009	21,076,009
Deposits with credit institutions	-	24,068,267	-	-	24,068,267
Cash at bank and in hand	-	14,430,133	-	-	14,430,133
Debtors arising out of direct insurance operations	-	-	-	6,803,805	6,803,805
Other debtors	-	-	-	377,939	377,939
	5,846,372	47,840,335	10,452,471	28,257,753	92,396,931

	2018 € AAA – AA+	**2018 € AA – A-**	**2018 € BBB+ – BBB-**	**2018 € Not Rated**	**2018 € Total**
Debt securities and other fixed income securities	6,041,892	9,058,737	9,181,519	-	24,282,148
Shares and other variable yield securities and units in unit trusts	-	-	-	17,936,192	17,936,192
Deposits with credit institutions	-	22,515,298	584,492	-	23,099,790
Cash at bank and in hand	-	1,337,704	9,604,758	-	10,942,462
Debtors arising out of direct insurance operations	-	-	-	6,741,917	6,741,917
Other debtors				375,712	375,712
	6,041,892	32,911,739	19,370,769	25,053,821	83,378,221

None of the financial assets are determined to be impaired as at the end of the reporting period.

C4. Liquidity Risk

Liquidity risk is the risk that the Company cannot meet its obligations associated with financial liabilities as they fall due.

The Company is exposed to liquidity risk on its insurance contracts.

The objective of the Company in managing its liquidity risk is to ensure risk is managed in line with the Company's risk appetite framework. The Company has established policies and procedures in order to manage liquidity risk and methods to measure it.

The Company's insurance liabilities and other material liabilities are matched closely with assets of appropriate amount, type, duration, and currency. Rolling monthly cash flow projections by currency are performed and are updated each month based on actual experience and additional information on expected future performance. As a result, the liquidity risk of the Company is mitigated.

There were no changes in the Company's liquidity risk exposure in the financial year, nor to the objectives, policies, and processes for managing liquidity risk.

The following table details the Company's expected maturity profile of the Company's obligations with respect to its financial liabilities:

	2019 € 1-3 months	2019 € 3-6 months	2019 € 6 months-1 year	2019 € Greater than 1 year	2019 € Total
Creditors arising out of Direct insurance operations	527,565	-	-	-	527,565
Other provisions	-	-	12,551,286	-	12,551,286
Other creditors	508,103	10,609	450,905	-	969,617
	1,035,668	10,609	13,002,191	-	14,048,468

	2018 € 1-3 months	2018 € 3-6 months	2018 € 6 months-1 year	2018 € Greater than 1 year	2018 € Total
Creditors arising out of Direct insurance operations	451,377	5,828,011	-	-	6,279,388
Other provisions	-	-	-	-	-
Other creditors	387,450	-	-	-	387,450
	838,827	5,828,011	-	-	6,666,838

The Company does not hold derivative assets. The following table details the Company's expected maturity for non derivative assets:

	2019 € 1-3 months	2019 € 3 months-1 year	2019 € 1-5 years	2019 € 5 years	2019 € Total
Debt securities and other fixed income securities	-	-	13,897,780	11,742,998	25,640,778
Shares and other variable yield securities and units in unit trusts	14,240,644	5,063,902	1,771,463	-	21,076,009
Deposits with credit institutions	2,700,000	20,067,060	1,301,207	-	24,068,267
Cash at bank and in hand	14,430,133	-	-	-	14,430,133
Debtors arising out of direct insurance operations	6,803,805	-	-	-	6,803,805
Other debtors	19,209	358,730	-	-	377,939
	38,193,791	25,489,692	16,970,450	11,742,998	92,396,931

	2018 € 1-3 months	2018 € 3 months-1 year	2018 € 1-5 years	2018 € 5 years	2018 € Total
Debt securities and other fixed income securities	-	2,358,790	12,373,026	9,550,332	24,282,148
Shares and other variable yield securities and units in unit trusts	12,324,468	4,679,769	931,955	-	17,936,192
Deposits with credit institutions	-	11,000,502	12,099,288	-	23,099,790
Cash at bank and in hand	10,942,462	-	-	-	10,942,462
Debtors arising out of direct insurance operations	6,741,917	-	-	-	6,741,917
Other debtors	16,777	358,935		-	375,712
	30,025,624	18,397,996	25,404,269	9,550,332	83,378,221

There are no future premiums included in the calculation of ECCU's technical provisions.

C5. Operational Risk

Operational risk refers to the risk of loss arising from inadequate or failed internal processes, or from personnel and systems, or from external events.

Operational Risk Categories

Internal Fraud
Internal Fraud is a loss due to acts of a type intended to defraud, misappropriate property or circumvent regulations, the law or company policy which involves at least one internal party.

Internal Fraud is categorised further into:

- Unauthorised activity;
- Claims fabrication; and
- Theft and fraud

External Fraud
External Fraud is a loss due to acts of a type intended to defraud, misappropriate property or circumvent the law by a third party.

External Fraud is categorised further into:

- Theft and fraud (including claims fraud); and,
- System security.

Employment Practices and Workspace Safety
A loss arising from acts inconsistent with employment, health and safety laws or agreements from payment of personal injury claims, or from diversity/discrimination events.

Employment practices and workplace safety is broken down further into:

- Employee relations – e.g. harassment, terminations, industrial action;
- Safe environment – e.g. health and safety, public liability, employee liability; and,
- Diversity and discrimination – e.g. equal opportunities, human rights.

Clients, products and business practices
A loss arising from an unintentional or negligent failure to meet a professional obligation to specific clients or from the nature or design of a product.

Clients, products, and business practices are broken down further into:

- Improper business or market practices;
- Client data protection and privacy;
- Product flaws;
- Credit control (e.g. management of premiums due from credit unions and reinsurance recoveries);
- Failure to adhere to policies and procedures manuals (may be dealt with as part of underwriting risk policy);
- Changes in the industry; and,
- Technological developments.

Damage to physical assets
A loss arising from loss or damage to physical assets from natural disaster or other events.

Business disruption and system failures
A loss arising from disruption or system failures.
Business disruption and system failures are broken down further into:

- Disaster recovery; and
- Business continuity.

Regulatory
Compliance with applicable laws, rules and regulations other than employment laws e.g. money laundering, regulatory reporting etc.

Legal
Some of the legal risks include:

- Defective contracts
- Litigation
- Changes in legislation/court rulings

Other operational risks

- Reliance on Arch Reinsurance Europe Underwriting Designated Activity Company
- Model error risk
- Pricing error risk
- Staff – Small staff contingent

Management and monitoring of Operational Risk
The Company's Risk Management System includes a Risk Management Cycle, RCSA and risk management policies and procedures which aim to ensure all risks are managed within the Risk Appetite set out by the Board.

Operational Risk is managed at a process level whereby process and risk owners perform quarterly RCSAs to identify, assess and report on risks and the effectiveness of the controls.

The Chief Risk Officer, ("CRO"), performs an independent review and challenge of the RCSAs for appropriateness.

In addition, Quality Assurance ("QA") frameworks have been established by the respective Risk and Compliance Functions to perform testing over the design and operating effectiveness of controls identified by the risk owners.

Where controls are deemed to be designed or operating ineffectively, action plans are developed to remediate the gap.

The CRO issues a Risk Report to the Risk Committee which includes the results of the RCSA, any issues noted, and the remediation plans which have been put in place to resolve any issues. The report will also include a summary from the CRO of changes to external risks since the last report and the recommended response to deal with the emerging risks.

Operational Risk Monitoring Actions and Reporting
The Company has no appetite for Operational Risk:

All incidents, near-misses and losses, resulting from inadequate or failed internal processes, personnel, systems or from an external event, are recorded in the Incident Log, reviewed by the SMT and material cases reported to the Risk Sub-Committee of the Board.

C6. Other Material Risks
Three other material risks of concern within our Company at present, are:

Cyber Risk:
With the increasing dependence on electronic communications, electronic data storage and use of the Internet there arises an increasing cyber security risk of data theft, malicious data interference and service disruption.

The Company outsources its Data Centre services to the ILCU.

Cybersecurity comprises the technologies, processes and practices designed to protect networks, computers, programs and data from attack, damage or unauthorised access. In a computing context, the term 'security' implies 'cybersecurity'.

The following are the core elements of cybersecurity:

- Application security
- Information and data security
- Network security
- Business continuity planning
- End user education

Some of the key risks associated with a cybersecurity attack are:

- Reputation damage – declining public confidence and harm to reputation
- Disruption to critical infrastructure, and damage to service provision to policyholders
- Theft of funds, data and corporate intellectual property
- Cost of responding to a breach – clean-up, legal fees, potential litigation, forensics and potential fines

Accountability sits with the Board. Directors approach cybersecurity as an enterprise-wide risk management issue, not just an Information and Communications Technology, ("ICT"), issue.

Brexit:
The nature of the post Brexit relationship of the UK with the EU, including Ireland, remains unclear at year-end 2019. The Company continues to monitor this area of risk and has prepared sensibly for Brexit and established relations with the UK's financial regulators to that end. ECCU has submitted an application to the Prudential Regulation Authority in the UK for authorisation of a branch operation in Northern Ireland, should this prove necessary to continue to service UK resident policyholders following the end of the transition period. The UK's Financial Conduct Authority has indicated its intention to allow inward passporting EU entities to avail of a temporary permissions regime, and ECCU has signalled its desire to participate in this, until its application for authorisation by the PRA has been processed.

Defined Benefit Pension Risk:

A defined benefit plan is a post-employment benefit plan other than a defined contribution plan. The Company, the ILCU, and individual credit unions participate in an industry-wide pension scheme for employees (The Irish League of Credit Unions Republic of Ireland Pension Scheme). This is a funded defined benefit scheme with assets managed by the Scheme's trustees.

The scheme is a multi-employer Scheme and due to the nature of the Scheme, it is not possible for the Company to separately identify its share of the Scheme's underlying assets and liabilities.

Consequently, it accounts for the Scheme as a defined contribution plan.

Following the Scheme's actuary certifying a Minimum Funding Standard deficit in the Scheme in 2009, the Company, the ILCU Group and the other credit unions participating in the Scheme entered into a funding agreement with the Scheme that was designed to ensure that the Scheme could be reasonably expected to satisfy the Minimum Funding Standard by a specified future date (1 March 2019). This funding plan ran up until 1 March 2019 and was approved by the Pensions Authority. The Company has paid the contributions payable under this funding agreement.

Macroeconomic Risks & threats to product sustainability

Income generation continues to be a challenge for credit unions due to the low interest rate environment and limited, though improving, demand for borrowing across the financial services sector.

In recent years ECCU responded to the cost challenges faced by its policyholders by launching lower benefit levels for its core LS and DBI optional product offerings so as to reduce premiums to this clientele.

During 2019 ECCU continued to engage in product innovation in order to make available alternative offerings to credit unions so as to help to ameliorate their cost challenges. New variants of LS and DBI, named Life Savings (Date of Death) and DBI^{two}, respectively, were launched which, it is anticipated, will increase the sustainability of the schemes as subscriptions rise.

D: Valuation for solvency purposes

D.1 Assets

There are no material differences between the bases, methods and main assumptions used by the Company for its valuation of assets for solvency purposes and those used for its valuation in the financial statements.

The following tables present a summary of the Solvency II valuation of each class of asset. There are only presentation differences between Solvency II and Financial Statement line items, arising from differences in classification between Solvency II and Irish GAAP.

Investments

	Solvency II 2019 €	Solvency II 2018 €
Government Bonds	25,640,777	24,282,148
Collective Investments Undertakings	21,076,008	17,936,192
Deposits other than cash equivalents	25,546,728	23,090,973
	72,263,513	65,309,313

Valuation Basis

Investments in equity instruments and investments in government bonds, are initially measured at fair value, which is normally the transaction price. Such financial assets are subsequently measured at fair value.

Fair value is the amount for which an asset or liability could be exchanged between willing parties in an arm's length transaction. Fair values are determined at prices quoted in active markets. In some instances, such price information is not available for all instruments and the Company applies valuation techniques to measure such instruments. These valuation techniques make maximum use of market observable data but in some cases management estimates other than market inputs within the valuation model are used. There is no standard model and different assumptions would generate different results.

Government Bonds

Government bonds are valued using a quoted price in an active market. An active market in this context means quoted prices are readily and regularly available and the quoted price is usually the current bid price. All of ECCU's government bonds are valued at bid price on a daily basis.

Collective Investments Undertakings

Certain financial assets are valued using the price of a recent transaction for an identical asset, where quoted prices are unavailable. This valuation method is used for the following collective investment undertakings held by ECCU:

- Underlying holdings in an equity fund – these are priced at the last traded price on a daily basis.

- Investment in the Absolute Alpha fund – the underlying funds are officially valued on a monthly basis by independent administrators. The managers of the

underlying funds also produce performance estimates, varying from weekly to monthly frequency. A combination of the latest month-end official valuations and the most recent performance estimates are used to update the value of the underlying holdings. The month end valuation reflects the market prices of the underlying securities within which the investment managers are invested.

Other financial assets valued using a valuation technique where recent transactions of an identical asset on their own are not a good estimate of fair value. This valuation method is used for the following collective investment undertakings held by ECCU:

- Investment in an Infrastructure fund – The unit value per share is calculated by the funds administrator, Northern Trust International Fund Administration Services (Ireland) Limited, in line with the funds valuation policy as set out in the prospectus. Valuations of the assets are undertaken semi-annually by qualified independent valuation agents. A financial model is prepared by the Infrastructure Investment manager and is presented to the independent valuer for their review. Sensitivity checks are performed on the financial model by the independent valuer. A valuation report is completed by the independent valuation agent which contains a valuation range and a mid-point recommendation. The Infrastructure Investment Manager reviews the recommendations made by the valuation agents following consideration of the appropriateness of the valuation methodologies adopted and analysis and discussion of the key assumptions. Assets are valued on a fair value basis. Valuations are determined adopting an income approach including a discounted cash flow model and residual profit method. The assumptions used to determine the discount rate include the risk free rate, market premium, asset beta, equity beta, gearing, tax, alpha risk premium, and the cost of equity.

- Investment in a residential property fund –The valuations are carried out by an Independent Valuer in accordance with (in Ireland) the Appraisal and Valuation Manual of the Society of Chartered Surveryors, (in the United Kingdom) the Appraisal and Valuation Manual of the Royal Institute of Chartered Surveyors, (in all other countries) the valuation standards formulated and published by the International Valuation Standards Committee. Properties are valued on a market value basis and reasonable estimates of costs which would be incurred in disposing of the property are included in the value of the properties.

Deposits other than cash equivalents

Cash and cash equivalents comprise amounts that are commonly used to make payments, and which the Company has instant access to. Deposits other than cash equivalents comprise amounts that cannot be used to make payments before a specific maturity date.

Cash and cash equivalents and other assets

	Solvency II 2019 €	Solvency II 2018 €
Cash and cash equivalents	12,951,671	10,951,280
Insurance and intermediaries receivables	6,690,712	6,689,717
Other assets	499,947	440,225
	20,142,330	18,081,222

Cash and cash equivalents comprise amounts that are commonly used to make payments, and which the Company has instant access to.

Insurance and intermediaries receivables comprise amounts due for payment by policyholders, insurers, and others linked to the insurance business.

Other assets comprise amounts such as reinsurance receivables and trade receivables.

All of the above are initially measured at transaction price and subsequently measured at amortised cost.

D.2 Technical Provisions

The table below shows the technical provisions and reinsurance recoverables at 31 December 2019 on the Solvency II basis. The Best Estimate Liability and risk margin are measured on the same basis in the Financial Statements. There is a difference in the recoverables from reinsurance contracts as measured on the Solvency II basis compared to the Financial Statements – this is explained in Section D.4.

Line of Business	Gross Best Estimate Liability €000	Risk Margin €000	Gross Technical Provisions (calculated as a whole) n/a	Recoverables from Reinsurance contracts and SPVs €000	Total Technical Provisions net of Recoverables 2019 €000	Total Technical Provisions net of Recoverables 2018 €000
Life	21,096	943	n/a	(473)	22,512	22,324
Health	2,269	470	n/a	-	2,739	3,298
Total	**23,366**	**1,412**	**n/a**	**(473)**	**25,251**	**25,622**

The methodology and assumptions used in calculating the technical provisions are in accordance with articles 75 to 86 of Directive 2009/138/EC of the European Parliament, articles 17 to 42 of Commission Delegated Regulation (EU) 2015/35 of 10 October 2014 supplementing Directive 2009/138/EC of the European Parliament and the Guidelines on valuation of technical provisions, EIOPA-BoS-14/166.

The methodology for calculating the best estimate liability ("BEL") is consistent with the concept of representing the amount that another insurer would need to be paid to assume these policies. The technical provisions typically consist of a liability equivalent to a best estimate of the future cash flows, along with a risk margin that EIOPA intended would reflect the compensation another insurer would be expected to seek for assuming the associated potential uncertainty.

The technical provisions do not include any allowance for transitional measures, matching adjustment or volatility adjustment.

The key sources of uncertainty associated with the technical provisions are the number and size of claim payments (in respect of claims incurred prior to the valuation date but not yet paid).

The background to the reserving approach is described below. The approach taken for reinsurance assets and liabilities (excluding creditors/debtors that arise in the normal course of business) is also described.

The BEL is calculated as the sum of the following:

- Estimate of outstanding claims: The liability is the estimate of claims that will be paid in each future year discounted using the EIOPA risk free rates. The estimate of claims that will be paid in each future year takes account of historic patterns of claim payment by type of claim, seasonal effects and changes in processing speeds where relevant.

- Allowance for expenses

The risk margin is calculated as the present value of the future SCRs, multiplied by the cost of capital of 6%. This is in line with the approach in Method (1) under Guideline 61 of the "Guidelines on the valuation of technical provisions" published by EIOPA.

The reinsurance recoverable is the reinsurer's share of the outstanding claims less premiums.

The Company has entered into reinsurance contracts in the normal course of business in order to limit the potential for losses arising from certain exposures. Reinsurance recoveries are accounted for in the same period as the related claim. The reinsurance recoverable for solvency purposes also allows for the premium payable to the reinsurer to cover potential catastrophe claims in 2019. This is consistent with the calculation of the SCR.

D.3 Other Liabilities

The following table presents a summary of the valuation of each class of other liabilities on a Solvency II basis at 31 December 2019, and 2018, which are the same as the Financial Statements.

	2019	2018
Other liabilities	**€**	**€**
Insurance & intermediaries payables	387,335	6,218,610
Provisions other than technical provisions	12,551,286	-
Other	1,117,700	565,686
	14,056,321	6,784,296

There are no material differences between the bases, methods and main assumptions used by the Company for its valuation of other liabilities for solvency purposes and those used for its valuation in the financial statements.

Insurance and intermediaries payables comprise amounts due to policyholders, insurers, and others linked to the insurance business. These are recognised initially at transaction price and are subsequently measured at amortised cost.

Other liabilities comprise amounts such as deferred tax liabilities, reinsurance payables, provision for claims experience refund and trade payables.

D.4 Alternative Methods for Valuation

Differences between bases, methods, assumptions used for Solvency and those used in Financial Statements

The reinsurance recoverable on the Solvency II balance sheet allows for the premium payable to the reinsurer to cover potential catastrophe claims in 2019.

This is consistent with the calculation of the SCR which allows for recoveries under this treaty where appropriate.

In the financial statements this reinsurance premium is accounted for in accordance with the contract terms when due, reflecting the period in which risk is transferred.

	Solvency II 2019 €000	Financial Statements 2019 €000	Solvency II 2018 €000	Financial Statements 2018 €000
Reinsurance recoverables	(473)	106	(438)	128

D.5 Any other information

No other material information is reported regarding the valuation of assets and liabilities for solvency purposes.

E. Capital Management

E.1 Own funds

The Company is a single shareholder entity whose shares are fully paid up. It has no debt financing nor does it have any plans to raise debt or issue new shares in the short or medium term.

The Company holds technical provisions to meet its liabilities to policyholders. In addition, the Central Bank of Ireland requires the Company to hold an excess of assets over its liabilities to meet its regulatory Solvency Capital Requirement and Overall Solvency Needs as determined by the process of ORSA. The Company's Solvency Capital Requirement is calculated using a standard formula as prescribed by the Solvency II Directive, Omnibus II Directive and Delegated Acts. Additional capital resources are required to cover all material risk exposures over and above the risks covered by The Company's Solvency Capital Requirement in order to meet its Overall Solvency Needs.

Restrictions on available capital resources

The Company has set out economic capital targets in its risk appetite framework towards ensuring its capital adequacy is maintained at all times. The Company's capital management policy and plan ensures that capital management is conducted within the defined risk appetite framework and in line with the overall risk strategy and discrete risk policies.

Should the Company's capital position deteriorate below the tolerance limits set out in the capital dimension of its risk appetite, the Board considers the prevailing circumstances and restricts the amount of surplus available for refund to policyholders and/or, where it is appropriate and feasible to do so, implements actions that reduce risk so as to bring the Company's overall solvency position back within its risk appetite.

Capital Management objectives

The Company's objectives in managing its capital are:

- To meet the requirements of its policyholders and the Central Bank of Ireland;
- To ensure it holds sufficient capital to meet its overall solvency needs;
- To match the profile of its liabilities, taking in to account the risks inherent in the Business;
- To provide security for policyholders; and
- To maintain sufficient financial strength to support new business growth.

The Company's own funds are all Tier 1 capital. There are no plans to change this.

The Company does not use derivative instruments other than those in the equity fund and Absolute Alpha fund, in which the company holds units, for efficient portfolio management.

Available capital resources

The table below sets out the level of free assets held by the Company compared to the minimum required on a regulatory basis.

	2019 €	2018 €
Total Shareholders Funds	53,677,519	51,551,071
Adjustments – Regulatory Basis:		
- Reinsurers' share of technical provisions	(579,047)	(566,205)
Total Free Assets available for Regulatory Solvency purposes	53,098,472	50,984,866
Solvency Capital Requirement	27,102,414	25,254,068
Excess of assets over Solvency Capital Requirement	25,996,058	25,730,798
Total Policyholder Liability on Regulatory basis:		
Life assurance provision	24,778,141	25,183,237

The cover for the Solvency Capital Requirement at 31 December 2019 is strong, with assets of €53,098,472 (2018: €50,984,866) available to cover the Solvency Capital requirement. The Company holds 196% (2018: 202%) of the Solvency Capital requirement at 31 December 2019.

The MCR at period end is €11,609,064.

Own Funds

	2019 Tier 1 €	2018 Tier 1 €
Ordinary share capital (gross of own shares)	36,599,871	36,599,871
Reconciliation Reserve*	16,498,602	13,884,996
Eligible amount of own funds to cover the SCR	53,098,473	50,484,867
Eligible amount of basic own funds to cover the MCR	53,098,473	50,484,867

*After allowing for a foreseeable dividend of nil in 2019 (2018: €500,000).

E.2 Solvency Capital Requirement and Minimum Capital Requirement

€000,000s	2019	2018
Market risk	9.0	7.0
Counterparty default risk	2.8	2.4
Life Underwriting risk	15.1	15.1
Health underwriting risk	7.5	6.8
Diversification effect	(10.4)	(9.1)
BSCR	**24.0**	**22.2**
Operational risk	3.1	3.1
SCR	**27.1**	**25.3**

The Company uses EIOPA's Solvency II Standard Formula. It does not use Company specific parameters and does not use simplified calculations in its computation.

The Minimum Capital requirement at 31st December 2019 is €11,609,064 (2018: €11,364,331).

The Solvency Capital Requirement at 31st December 2019 is €27,102,414 (2018: €25,254,068).

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

The Company has opted not to use the duration-based equity risk sub module of the Solvency II regulations.

E.4 Differences between the Standard Formula and Any Internal Model used

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 non-Compliance with the Solvency Capital Requirement

There was no breach of the Solvency Capital Requirement (or the Minimum Capital Requirement) over the reporting period.

E.6 Any other information

There is no other material information to disclose regarding capital management.

ECCU Assurance DAC

Solvency and Financial Condition Report

Disclosures

31 December

2019

(Monetary amounts in EUR thousands)

General information

Undertaking name	ECCU Assurance DAC
Undertaking identification code	635400SOYBXW4XBIRY60
Type of code of undertaking	LEI
Type of undertaking	Life undertakings
Country of authorisation	IE
Language of reporting	en
Reporting reference date	31 December 2019
Currency used for reporting	EUR
Accounting standards	Local GAAP
Method of Calculation of the SCR	Standard formula
Matching adjustment	No use of matching adjustment
Volatility adjustment	No use of volatility adjustment
Transitional measure on the risk-free interest rate	No use of transitional measure on the risk-free interest rate
Transitional measure on technical provisions	No use of transitional measure on technical provisions

List of reported templates

S.02.01.02 - Balance sheet
S.05.01.02 - Premiums, claims and expenses by line of business
S.05.02.01 - Premiums, claims and expenses by country
S.12.01.02 - Life and Health SLT Technical Provisions
S.23.01.01 - Own Funds
S.25.01.21 - Solvency Capital Requirement - for undertakings on Standard Formula
S.28.01.01 - Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity

S.02.01.02

Balance sheet

		Solvency II value
	Assets	C0010
R0030	Intangible assets	0
R0040	Deferred tax assets	0
R0050	Pension benefit surplus	0
R0060	Property, plant & equipment held for own use	0
R0070	Investments (other than assets held for index-linked and unit-linked contracts)	72,264
R0080	*Property (other than for own use)*	0
R0090	*Holdings in related undertakings, including participations*	0
R0100	*Equities*	0
R0110	*Equities - listed*	0
R0120	*Equities - unlisted*	0
R0130	*Bonds*	25,641
R0140	*Government Bonds*	25,641
R0150	*Corporate Bonds*	0
R0160	*Structured notes*	0
R0170	*Collateralised securities*	0
R0180	*Collective Investments Undertakings*	21,076
R0190	*Derivatives*	0
R0200	*Deposits other than cash equivalents*	25,547
R0210	*Other investments*	0
R0220	Assets held for index-linked and unit-linked contracts	0
R0230	Loans and mortgages	0
R0240	*Loans on policies*	0
R0250	*Loans and mortgages to individuals*	0
R0260	*Other loans and mortgages*	0
R0270	Reinsurance recoverables from:	-473
R0280	*Non-life and health similar to non-life*	0
R0290	*Non-life excluding health*	0
R0300	*Health similar to non-life*	0
R0310	*Life and health similar to life, excluding index-linked and unit-linked*	-473
R0320	*Health similar to life*	0
R0330	*Life excluding health and index-linked and unit-linked*	-473
R0340	*Life index-linked and unit-linked*	0
R0350	Deposits to cedants	0
R0360	Insurance and intermediaries receivables	6,691
R0370	Reinsurance receivables	113
R0380	Receivables (trade, not insurance)	53
R0390	Own shares (held directly)	0
R0400	Amounts due in respect of own fund items or initial fund called up but not yet paid in	0
R0410	Cash and cash equivalents	12,952
R0420	Any other assets, not elsewhere shown	334
R0500	**Total assets**	91,933

		Solvency II value
	Liabilities	C0010
R0510	Technical provisions - non-life	0
R0520	*Technical provisions - non-life (excluding health)*	0
R0530	*TP calculated as a whole*	0
R0540	*Best Estimate*	0
R0550	*Risk margin*	0
R0560	*Technical provisions - health (similar to non-life)*	0
R0570	*TP calculated as a whole*	0
R0580	*Best Estimate*	0
R0590	*Risk margin*	0
R0600	Technical provisions - life (excluding index-linked and unit-linked)	24,778
R0610	*Technical provisions - health (similar to life)*	2,739
R0620	*TP calculated as a whole*	0
R0630	*Best Estimate*	2,269
R0640	*Risk margin*	470
R0650	*Technical provisions - life (excluding health and index-linked and unit-linked)*	22,039
R0660	*TP calculated as a whole*	0
R0670	*Best Estimate*	21,096
R0680	*Risk margin*	943
R0690	Technical provisions - index-linked and unit-linked	0
R0700	*TP calculated as a whole*	0
R0710	*Best Estimate*	0
R0720	*Risk margin*	0
R0740	Contingent liabilities	0
R0750	Provisions other than technical provisions	12,551
R0760	Pension benefit obligations	0
R0770	Deposits from reinsurers	0
R0780	Deferred tax liabilities	0
R0790	Derivatives	0
R0800	Debts owed to credit institutions	0
R0810	Financial liabilities other than debts owed to credit institutions	0
R0820	Insurance & intermediaries payables	387
R0830	Reinsurance payables	349
R0840	Payables (trade, not insurance)	768
R0850	Subordinated liabilities	0
R0860	*Subordinated liabilities not in BOF*	0
R0870	*Subordinated liabilities in BOF*	0
R0880	Any other liabilities, not elsewhere shown	0
R0900	**Total liabilities**	38,834
R1000	**Excess of assets over liabilities**	53,098

S.05.01.02

Premiums, claims and expenses by line of business

Life

		Line of Business for: life insurance obligations						Life reinsurance obligations		Total
		Health insurance	Insurance with profit participation	Index-linked and unit-linked insurance	Other life insurance	Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance	Health reinsurance	Life reinsurance	
		C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0300
	Premiums written									
R1410	Gross	2,997			73,961					76,958
R1420	Reinsurers' share	57			1,406					1,463
R1500	Net	2,941			72,554					75,495
	Premiums earned									
R1510	Gross	2,997			73,961					76,958
R1520	Reinsurers' share	57			1,406					1,463
R1600	Net	2,941			72,554					75,495
	Claims incurred									
R1610	Gross	570			60,537					61,108
R1620	Reinsurers' share	0			480					480
R1700	Net	570			60,058					60,628
	Changes in other technical provisions									
R1710	Gross	0			0					0
R1720	Reinsurers' share	0			0					0
R1800	Net	0			0					0
R1900	**Expenses incurred**	177			4,379					4,557
R2500	**Other expenses**									-259
R2600	**Total expenses**									4,298

S.05.02.01

Premiums, claims and expenses by country

Life

		C0150	C0160	C0170	C0180	C0190	C0200	C0210
		Home Country	Top 5 countries (by amount of gross premiums written) - life obligations			Top 5 countries (by amount of gross premiums written) - life obligations		Total Top 5 and home country
R1400			GB					
		C0220	C0230	C0240	C0250	C0260	C0270	C0280
	Premiums written							
R1410	Gross	61,453	15,506					76,958
R1420	Reinsurers' share	1,168	295					1,463
R1500	Net	60,284	15,211					75,495
	Premiums earned							
R1510	Gross	61,453	15,506					76,958
R1520	Reinsurers' share	1,168	295					1,463
R1600	Net	60,284	15,211					75,495
	Claims incurred							
R1610	Gross	47,631	13,476					61,108
R1620	Reinsurers' share	476	3					480
R1700	Net	47,155	13,473					60,628
	Changes in other technical provisions							
R1710	Gross	0	0					0
R1720	Reinsurers' share	0	0					0
R1800	Net	0	0					0
R1900	**Expenses incurred**	3,639	918					4,557
R2500	**Other expenses**							-259
R2600	**Total expenses**							4,298

S.12.01.02

Life and Health SLT Technical Provisions

		Insurance with profit participation	Index-linked and unit-linked insurance			Other life insurance			Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance	Accepted reinsurance	Total (Life other than health insurance, including Unit-Linked)	Health insurance (direct business)			Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Health reinsurance (reinsurance accepted)	Total (Health similar to life insurance)
				Contracts without options and guarantees	Contracts with options or guarantees		Contracts without options and guarantees	Contracts with options or guarantees					Contracts without options and guarantees	Contracts with options or guarantees			
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0150	C0160	C0170	C0180	C0190	C0200	C0210
R0010	**Technical provisions calculated as a whole**					0					0	0					0
R0020	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					0					0	0					0
	Technical provisions calculated as a sum of BE and RM																
	Best estimate																
R0030	**Gross Best Estimate**						21,096				21,096		2,269				2,269
R0080	Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default						-473				-473		0				0
R0090	Best estimate minus recoverables from reinsurance/SPV and Finite Re						21,569	0			21,569		2,269	0			2,269
R0100	**Risk margin**					943					943	470					470
	Amount of the transitional on Technical Provisions																
R0110	Technical Provisions calculated as a whole					0					0	0					0
R0120	Best estimate						0				0		0				0
R0130	Risk margin					0					0	0					0
R0200	**Technical provisions - total**					22,039					22,039	2,739					2,739

S.23.01.01

Own Funds

	Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35	Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
R0010	Ordinary share capital (gross of own shares)	36,600	36,600		0	
R0030	Share premium account related to ordinary share capital	0	0		0	
R0040	Initial funds, members' contributions or the equivalent basic own-fund item for mutual and mutual-type undertakings	0	0		0	
R0050	Subordinated mutual member accounts	0		0	0	0
R0070	Surplus funds	0	0			
R0090	Preference shares	0		0	0	0
R0110	Share premium account related to preference shares	0		0	0	0
R0130	Reconciliation reserve	16,499	16,499			
R0140	Subordinated liabilities	0		0	0	0
R0160	An amount equal to the value of net deferred tax assets	0				0
R0180	Other own fund items approved by the supervisory authority as basic own funds not specified above	0	0	0	0	0
R0220	**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**	0				
R0230	**Deductions for participations in financial and credit institutions**	0				
R0290	**Total basic own funds after deductions**	53,098	53,098	0	0	0
	Ancillary own funds					
R0300	Unpaid and uncalled ordinary share capital callable on demand	0				
R0310	Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	0				
R0320	Unpaid and uncalled preference shares callable on demand	0				
R0330	A legally binding commitment to subscribe and pay for subordinated liabilities on demand	0				
R0340	Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	0				
R0350	Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	0				
R0360	Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	0				
R0370	Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	0				
R0390	Other ancillary own funds	0				
R0400	**Total ancillary own funds**	0			0	0
	Available and eligible own funds					
R0500	Total available own funds to meet the SCR	53,098	53,098	0	0	0
R0510	Total available own funds to meet the MCR	53,098	53,098	0	0	
R0540	Total eligible own funds to meet the SCR	53,098	53,098	0	0	0
R0550	Total eligible own funds to meet the MCR	53,098	53,098	0	0	

R0580	**SCR**	27,102
R0600	**MCR**	11,609
R0620	**Ratio of Eligible own funds to SCR**	195.92%
R0640	**Ratio of Eligible own funds to MCR**	457.39%

	Reconcilliation reserve	C0060
R0700	Excess of assets over liabilities	53,098
R0710	Own shares (held directly and indirectly)	0
R0720	Foreseeable dividends, distributions and charges	0
R0730	Other basic own fund items	36,600
R0740	Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	0
R0760	**Reconciliation reserve**	16,499
	Expected profits	
R0770	Expected profits included in future premiums (EPIFP) - Life business	
R0780	Expected profits included in future premiums (EPIFP) - Non- life business	
R0790	**Total Expected profits included in future premiums (EPIFP)**	0

S.25.01.21

Solvency Capital Requirement - for undertakings on Standard Formula

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0120
R0010	Market risk	9,045		
R0020	Counterparty default risk	2,779		
R0030	Life underwriting risk	15,100		
R0040	Health underwriting risk	7,520		
R0050	Non-life underwriting risk	0		
R0060	Diversification	-10,420		
R0070	Intangible asset risk	0		
R0100	**Basic Solvency Capital Requirement**	24,024		

USP Key

For life underwriting risk:
1- Increase in the amount of annuity benefits
9 - None

For health underwriting risk:
1- Increase in the amount of annuity benefits
2 - Standard deviation for NSLT health premium risk
3 - Standard deviation for NSLT health gross premium risk
4 - Adjustment factor for non-proportional reinsurance
5 - Standard deviation for NSLT health reserve risk
9 - None

For non-life underwriting risk:
4 - Adjustment factor for non-proportional reinsurance
6 - Standard deviation for non-life premium risk
7 - Standard deviation for non-life gross premium risk
8 - Standard deviation for non-life reserve risk
9 - None

	Calculation of Solvency Capital Requirement	C0100
R0130	Operational risk	3,078
R0140	Loss-absorbing capacity of technical provisions	0
R0150	Loss-absorbing capacity of deferred taxes	0
R0160	Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	0
R0200	**Solvency Capital Requirement excluding capital add-on**	27,102
R0210	Capital add-ons already set	0
R0220	**Solvency capital requirement**	27,102

	Other information on SCR	
R0400	Capital requirement for duration-based equity risk sub-module	0
R0410	Total amount of Notional Solvency Capital Requirements for remaining part	0
R0420	Total amount of Notional Solvency Capital Requirements for ring fenced funds	0
R0430	Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	0
R0440	Diversification effects due to RFF nSCR aggregation for article 304	0

	Approach to tax rate	C0109
R0590	Approach based on average tax rate	0

	Calculation of loss absorbing capacity of deferred taxes	**LAC DT**
		C0130
R0640	LAC DT	0
R0650	LAC DT justified by reversion of deferred tax liabilities	0
R0660	LAC DT justified by reference to probable future taxable economic profit	0
R0670	LAC DT justified by carry back, current year	0
R0680	LAC DT justified by carry back, future years	0
R0690	Maximum LAC DT	0

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
R0010	MCR_{NL} Result	0

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

	Linear formula component for life insurance and reinsurance obligations	C0040
R0200	MCR_L Result	11,609

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
		C0050	C0060
R0210	Obligations with profit participation - guaranteed benefits	0	
R0220	Obligations with profit participation - future discretionary benefits	0	
R0230	Index-linked and unit-linked insurance obligations	0	
R0240	Other life (re)insurance and health (re)insurance obligations	23,839	
R0250	Total capital at risk for all life (re)insurance obligations		15,869,219

	Overall MCR calculation	C0070
R0300	Linear MCR	11,609
R0310	SCR	27,102
R0320	MCR cap	12,196
R0330	MCR floor	6,776
R0340	Combined MCR	11,609
R0350	Absolute floor of the MCR	3,700
R0400	**Minimum Capital Requirement**	11,609