Solvency and Financial Condition Report ("SFCR")

Eni Insurance DAC

Report as at 31st December 2019

SFCR Report 2019

COMPANY INFORMATION

REGISTERED OFFICE

Eni Insurance DAC
Two Dockland Central, Guild Street
Dublin, 1 – Ireland

Eni Insurance DAC is regulated by the Central Bank of Ireland

VAT registration number Nr. IE 6442208S
Company Share Capital euro 500,000,000.00 Paid Up
Registered in Ireland: Reg. No. 422208
Registered Office: Two Dockland Central, Guild Street, Dublin 1

AUDITORS

PricewaterhouseCoopers Ireland
Statutory Audit Firm
One Spencer Dock
North Wall Quay
Dublin 1 - Ireland
Last appointment: Annual General Meeting 10 April 2019

SHAREHOLDER

Eni Spa 100%
Piazzale Mattei 1
Rome - Italy

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Executive Summary

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

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

Company Background

Eni Insurance DAC is a company incorporated in Ireland and authorised by the Central Bank of Ireland to carry out the following classes of non-life insurance business:

Classes of Business	Effective authorisation date
Property Damage and miscellaneous financial loss - Classes 8, 9 & 16;	01-Jul-06
General Liability - Class 13;	01-Jul-06
Damage to or Loss of Ships - Class 6;	01-Jul-06
Liability for Ships - Class 12;	01-Jul-06
Goods in Transit - Class 7.	01-Jul-06
Accident - Classes 1;	21-Dec-12
Sickness - Class 2;	21-Dec-12
Aircraft - Class 5;	21-Dec-12
Surety ship - Class 15;	21-Dec-12
Credit - Class 14.	06-May-15

The Company is the sole vehicle within the Eni Group for centralising insurance services for the benefit of Eni Group companies. The main objectives of the Company is to contain and stabilise the insurance costs for Eni Group as stated in the Eni Centralised Programme.

Business and Performance

In 2019 the Company achieved a positive result on its technical account non-life insurance business of €68,465,452 profit (2018 profit: €50,524,189).

The directors consider the level of business and the financial position of the Company to be satisfactory.

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

System of Governance

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

- Board of Directors
- Board Sub-Committees
- Internal Control Framework
- Risk Management Framework which considers the following key control functions:

  - ✓ Head of Actuarial Function
  - ✓ Compliance Function
  - ✓ Internal Audit

Outsourced Activities

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

Service Outsourced	Jurisdiction
Internal Audit	EU
Head of Actuarial Function	UK
IT	EU

Other important service providers are Deloitte for payroll services and Banque Eni for financial and payment services.

Risk Profile

The following table outlines the material risks to which the Company is exposed as well as the undiversified capital charge associated with each risk.

Risk	Capital Charge € '000 2019	Capital Charge € '000 2018
Market Risk	55,610	65,492
Counterparty Default Risk	48,306	56,529
Non-Life Underwriting Risk	243,383	227,685

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

Valuation for Solvency Purposes

The Company assets and liabilities, under Solvency II methodology, are valued at best estimate. This differs in some respects from the GAAP valuations included in the financial statements. In particular, the technical provisions for the Solvency II balance sheet

represent the present value of future claim payments. A risk margin is also included in the technical provisions, which represents the cost of holding the solvency capital requirement. Section D of the SFCR shows the comparison between the Solvency II balance sheet and the Financial Statements.

Capital Management

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

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

At the end of 2019, the Company had Available funds (after foreseeable dividend distribution) of assets over liabilities of €536.8 million on a Solvency II valuation basis. This compares to a SCR requirement of €294.6 million and indicates a solvency cover ratio of 182% (202% in 2018). The MCR coverage ratio is 729%.

Solvency II Ratio € Mln	2019	2018
SCR - Solvency Capital Requirement	294.6	265.9
Available Funds	536.8	538.6
Surplus	242.2	272.6
Solvency II Ratio (min 100%)	**182.2%**	**202.5%**
MCR - Minimum Capital Requirement	73.6	66.5
MCR Cover	**728.9%**	**810.0%**

A BUSINESS AND PERFORMANCE

A.1 Business

A.1.1 Name and legal form of the undertaking

Eni Insurance DAC (the "Company") is incorporated in the Republic of Ireland and is a private company limited by shares.

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

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

A.1.3 External auditor of the undertaking

The independent auditors of the Company are: PricewaterhouseCoopers Ireland, Statutory Audit Firm, One Spencer Dock, North Wall Quay, Dublin 1, Ireland

A.1.4 Holders of Qualifying Holdings in the Undertaking

The Company is wholly owned subsidiary of Eni S.p.A, a company incorporated in Italy.

A.1.5 Legal Structure of the Group

Eni S.p.A is also the ultimate parent company.

A.1.6 Material lines of business and geographical areas

The Company's principal activity is to accept insurance risks arising from various exposures facing the Eni Group. It currently writes the following Solvency II Classes of Business:

- Fire and other damage to property
- Marine, Aviation and transport
- General liability
- Credit and suretyship
- Miscellaneous Financial Loss

The material geographical areas are: Europe, Africa, America, Asia and Oceania.

A.1.7 Significant Business events during the reporting period:

The Company has in the past underwritten a CAR policy for ENI business in Egypt; project Zohr. In 2019 Eni divested 10% share of its participation in the Zohr project phase named Rup (Eni original share 60%), however EID management resolved to keep the original risk. As a result of the above, EID now has a 60% interest in the Rup construction all risks insurance, whereas Eni has a 50% interest. The Rup maintenance phase started on 31st December 2019.

In the past the Company has underwritten Construction all risks insurance for the Johan Castberg project, in Norway. At the end of 2018, Eni divested a share (9.12%) of its participation, however EID management resolved to keep the original risk. As

a result of the above, EID now has a 30% interest in Johan Castberg construction all risks insurance, whereas Eni has a 20.88% interest.

At the date of preparation of the SFCR, some instability factors have arisen that should not be underestimated, such as, among others, the emergence and spread of Covid-19 which, in the first weeks of the 2020, initially impacted economic activity in China and subsequently in other countries. These factors have been considered as events that do not entail adjustments to the SFCR since it is only from the end of January 2020 that the World Health Organization declared the COVID-19 epidemic an international public health emergency with the spread of the virus that has accelerated sharply in recent weeks, with outbreaks in Italy and an increasing number of countries in the European Union and the world.

Given the elements of absolute uncertainty regarding the spread of the epidemic and the consequent actions that have been put in place by Governments to combat it, it is not possible to exclude particularly severe effects on the world economy.

EID has already underwritten the majority of 2020 Insurance Contracts and set the Reinsurance programme, and given the nature of the business the claims are substantially not impacted by COVID-19, therefore no major effect is foreseen in relation to the technical result.

A non-quantifiable secondary effect might be recorded in relation to the Investment result, though EID has prudent investment policy in place, and a reduction to the SCR ratio might be recorded as a result of possible counterparties down-rating and market fluctuation. In this respect EID annually performs a stress scenario for ORSA purposes, which models the company being forced to sell part of the investment portfolio as a result of the downgrade of counterparty rating. The deterioration in the value of the invested assets of the Company, and the lower credit rating produce a maximum effect of -32% on the SCR ratio (ORSA 2019). A similar loss applied to 2019 year-end results would still lead to an SCR ratio in line with the defined risk appetite of the Company, hence would not provide a challenge to the Company's ability to meet its capital requirements. This scenario will be updated this year in order to reflect the ongoing situation.

A.2 Underwriting Performance

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

The table below shows the aggregate performance for the year ended 31 December 2019 (based on Irish GAAP):

Aggregate UW Performance	31/12/2019 €'000	31/12/2018 €'000	Difference
Gross earned premium	201.868	160.542	**41.326**
Reinsurers' share of premiums	-73.259	-29.527	**-43.732**
Net earned premium	128.609	131.015	**-2.406**
Gross claims incurred	-144.895	-232.740	**87.845**
Net claims incurred	-62.306	-38.444	**-23.862**
Net operating expenses	-13.134	-13.479	**345**
Other Technical Charge/Income	12.930	-31.012	**43.942**
Investment (loss)/income	2.366	2.444	**-78**
Balance on the technical account	**68.465**	**50.524**	**17.941**

The Company had a result on its non-life insurance technical account of €68,465,452 profit (2018 profit: €50,524,189). The Oil Insurance Ltd (OIL) return premium for 2019 was € 22.1 Million (2018: € 36.2 million).

The decrease of earned premium, net of reinsurance (€2.4 million), was mainly due to a lower Oil return premium for 2019 of €14.1 million, partially offset by higher gross earned premiums, mainly related to an increase in Property Damage and Business Interruption lines of business. Also reinsurance premiums were higher in 2019 as all the market experienced a hardening during 2019.

There was a higher amount of net claims incurred compared to 2018, €23.8 million. Net loss ratio adjusted for the Oil return was 58.5% (2018: 40.5%).

The net operating expenses was in line with the previous year cost (reduction of € 0.3 million).

The Other technical charges decreased by €43.9 million due to lower costs for Theoretical Withdrawal Premium (TWP) – OIL due to a positive effect in 2019 against a high cost impact in 2018.

TWP is a provision related to the cost to EID of exiting the mutual OIL Insurance Limited (OIL) and the calculation is based on the amount of future annual premiums which the Company would have to pay in the five underwriting years subsequent to such Policy cancellation.

The tables below show a summary of the underwriting activity for the year ended 31 December 2019 by material Line of Business and Geographical area (based on Irish GAAP):

Financial year ended 31 December 2019					
By Line of Business	**Marine, Aviation & Transport**	**Fire & Other Damage to Property**	**Third Party Liability**	**Credit & Suretyship & Other Classes** *	**Total**
	€'000	**€'000**	**€'000**	**€'000**	**€'000**
Gross premiums Written	2.801	141.398	18.625	33.891	**196.714**
Reinsurers' share of written gross premiums	0	-34.942	-7.591	-29.882	**-72.518**
Gross earned premium	2.780	147.757	17.403	33.928	**201.868**
Net earned premium	2.678	112.078	9.811	4.042	**128.609**
Gross Claims incurred	349	-92.634	-11.178	-41.432	**-144.895**
Net Claims incurred	-296	-55.905	-4.534	-1.571	**-62.306**

Financial year ended 31 December 2018					
By Line of Business	**Marine, Aviation & Transport**	**Fire & Other Damage to Property**	**Third Party Liability**	**Credit & Suretyship & Other Classes** *	* **Total**
	€'000	**€'000**	**€'000**	**€'000**	**€'000**
Gross premiums Written	2.765	125.843	17.469	21.057	**167.134**
Reinsurers' share of written gross premiums	-3	-5.148	-6.705	-18.735	**-30.591**
Gross earned premium	2.779	118.201	18.008	21.555	**160.542**
Net earned premium	2.776	114.484	11.300	2.455	**131.015**
Gross Claims incurred	3.003	-200.881	-7.293	-27.569	**-232.740**
Net Claims incurred	1.082	-30.789	-7.295	-1.442	**-38.444**

**Credit & Suretyship Other classes include Business Interruption*

Financial year ended 31 December 2019 By Material Geographical Area	Asia/Oceania	Africa	Europe	America	Total
	€'000	€'000	€'000	€'000	€'000
Gross premiums Written	29.596	43.922	99.359	23.838	**196.714**
Reinsurers' share of gross written premiums	-13.773	-10.605	-38.446	-9.694	**-72.518**
Gross earned premium	26.507	49.058	99.565	26.737	**201.868**
Net earned premium	13.686	37.857	60.783	16.282	**128.609**
Gross Claims incurred	4.441	-10.823	-139.574	1.062	**-144.895**
Net Claims incurred	4.441	-10.823	-56.984	1.062	**-62.306**

Financial year ended 31 December 2018 By Material Geographical Area	Asia/Oceania	Africa	Europe	America	Total
	€'000	€'000	€'000	€'000	€'000
Gross premiums Written	16.191	35.522	90.568	24.852	**167.134**
Reinsurers' share of gross written premiums	-10.080	-1.315	-18.928	-268	**-30.591**
Gross earned premium	16.647	42.278	83.837	17.780	**160.542**
Net earned premium	12.538	40.418	64.931	13.127	**131.015**
Gross Claims incurred	-119.654	-5.487	-77.305	-30.294	**-232.740**
Net Claims incurred	-8.350	-3.422	-21.857	-4.816	**-38.444**

A.3 Investment Performance

A.3.1 Income and expenses arising by asset class

The Company has an investment strategy which complies with the "the prudent person principle".

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

Asset Class	31-12-19		31-12-18	
	Amount €'000	% of portfolio	Amount €'000	% of portfolio
Shares and other variable yield securities (OIL)	13	0%	13	0%
Debt and Other Fixed Income Securities	150,229	16%	250,339	26%
Bonds	530,496	56%	451,323	47%
Loans and Receivables	38,000	4%	75,476	8%
Cash Equivalents	211,008	22%	173,167	18%
Cash at Bank	15,652	2%	12,671	1%
Total	**945,398**	**100%**	**962,989**	**100%**

The table below sets out the investment return:

Investment Return (bonds, securities and cash)	31-12-19 Total €'000	31-12-18 €'000
Investment income	9,954	8,500
Net realised loss	-381	-468
Unrealised gain/(loss) on investments	-237	-10,537
Investment management expense and other costs	-1,058	-1,991
Net investment result	**8,278**	**-4,496**

The Company had a gain from investment activity of €8,277,847 (2018 loss: €4,495,635).

The income from investments was positive due to optimization of the investment strategy, particularly in relation to the USD portfolio and this led to an improvement compared to 2018 despite prevailing negative short term interest rates.

A.3.2 Gains and losses recognised directly in equity

No gains and losses have been recognised directly in equity.

No equities, other than participation in Oil Insurance Limited, are held by EID.

A.3.3 Investments in securitisation

There are no investments in securitisation.

A.4 Performance of Other Activities

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

The Company leases office space under an operating lease, which expires in 2037.

A.5 Any Other Information

There are no other material matters in respect of the business and performance of the Company.

B SYSTEM OF GOVERNANCE

B.1 General Information on the system of governance

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

The Company is classified as a Medium-High Risk firm under the Central Bank of Ireland's risk-based framework for the supervision of regulated firms, known as PRISM or Probability Risk and Impact System and has a requirement to comply with the provisions of the Central Bank of Ireland's Corporate Governance Requirements for Insurance Undertakings 2015.

Board of Directors:
The Board of Directors is composed of 5 members

- Chairman - non executive
- General Manager – executive
- 1 Member – executive
- 2 Members - Independent non-executive

All directors are members of the risk management and audit committees.
The responsibilities of the Board include:

- Ensuring the effective, prudent and ethical oversight of the business;
- Setting the business strategy and risk appetite;
- Ensuring that risk and compliance are effectively managed in the Company;
- Ensuring that the solvency capital requirements and minimum capital requirements are maintained at all times.

The composition of the Board of Directors is as follows:

Name	Status on Board	Membership and Status on Board and Sub-Committees	PCF
F. Mastrantonio	Chairman	Chair of the Board Chair of Risk Committee Member of Board	PCF-3 PCF-5 PCF-2
L. Marnetto	Executive Director	Member of All	PCF-1
M. Diotti *(up to 19/02/2020)*	Executive Director	Member of All	PCF-1
A. Di Marzio *(from 20/02/2020)*	Executive Director	Member of All	PCF-1
C. Somers	Independent Non-Executive Director	Member of All	PCF-2
B. Crowe	Independent Non-Executive Director	Member of All Chair of Audit Committee	PCF-2 PCF-4

Sub-Committees:

The following sub-committees have been established:

- Audit Committee

  The Audit Committee is responsible for assisting the Board in terms of the financial reporting processes, internal controls, performance of the internal and external audit processes and any other matters that may impact the financial results of the Company. The Committee meets not less than twice a year and the Chair of the Committee is an independent Non-Executive Director who is also a member of the Board.

- Risk Management Committee

  The Risk Management Committee meets not less than twice a year and is responsible for assisting the Board in discharging its responsibilities for:

  - The effectiveness of the Company's risk management systems;
  - The implementation and maintenance of the Company's risk strategy;
  - Solvency II oversight;
  - Investment oversight;
  - Timely reporting of material deviations from the defined risk appetite;
  - Monitoring the effectiveness and independence of the Risk Management Function.

Independent Control Functions:

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

Risk Management Function

The role of the Company's risk management function is to identify and evaluate the major risks facing the Company and to facilitate the implementation of the risk management system. The Board of Directors has appointed a Chief Risk Officer to undertake this role. The roles and responsibilities of the risk management function are set out within the Risk Management Policy. The CRO reports to the BoD via the risk committee.

Compliance Function

In order to effectively monitor and report on the Company's requirement to be in compliance with all applicable laws and regulatory requirements, the Board of Directors has appointed a Compliance Officer to undertake this role. The role and responsibilities of the Compliance Officer are set out within the Compliance and Internal Control Policy. The Compliance Officer reports to the Board.

Actuarial Function

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

Internal Audit Function

The internal audit function is outsourced to Eni SpA (Support Function). The scope of internal audit activities includes the examination and evaluation of the effectiveness of the internal control, risk management, governance systems and processes of the entire licensed entity, including the Company's outsourced activities. The Internal Audit function reports to the Audit Committee. The Head of Internal Audit role is outsourced to Eni SpA and currently the PCF role is held by Francesco Di Marzo.

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

Name	Role	PCF	Start Date	End Date
Fabien Graeff	Head of Actuarial Function	PCF-48	02/08/2017	18/04/2019
Charlotte Healy	Head of Actuarial Function	PCF-48	18/04/2019	11/10/2019
Tom Jowett	Head of Actuarial Function	PCF-48	06/03/2020	currently in the role
Sergio Gatti	Head of internal Audit	PCF-13	10/03/2016	09/07/2019
Francesco Di Marzo	Head of internal Audit	PCF-13	09/07/2019	currently in the role
Marco Diotti	Executive Director	PCF-1	14/01/2016	20/02/2020
Marco Diotti	Head of Finance	PCF-11	24/11/2015	20/02/2020
Alberto Di Marzio	Executive Director	PCF-1	20/02/2020	currently in the role
Alberto Di Marzio	Head of Finance	PCF-11	20/02/2020	currently in the role
Francesco Onori	Head of Compliance & AML	PCF-15	28/01/2014	16/09/2019
Francesco Onori	Head of Compliance	PCF-12	16/09/2019	currently in the role

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

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

The objectives of the Remuneration Policy are to ensure:

- that remuneration policy and practices are aligned with the Company strategy, Risk Management Strategy and risk appetite, objectives, values and long-term interests of the Company;
- that the policy applies to the undertaking as a whole in a proportionate and risk focused way, taking into account the respective roles of the personnel responsible for key functions or who make or participate in making decisions, that affect the whole or a substantial part of the Company's business, including members of the Board of Directors;
- that the remuneration policy does not foster practices adverse to the policyholders' interests;
- that a clear, transparent and effective governance structure around remuneration is in place;

- that the Company can attract and retain highly qualified Board members and employees with skills required to effectively manage the Company;
- that Board members and employees are compensated appropriately for the services they provide to the Company; and
- that the remuneration motivates Board members and employees to perform in the best interests of the Company and its stakeholders.

B.1.3.2 Information on the individual and collective performance criteria on which any entitlement to share options, shares or variable components of remuneration is based

The Company maintains an Annual Incentive Compensation Plan to reward performance each year. The incentive award is based upon the degree of achievement of an individual department and the overall company objectives for the plan period as measured by the Company's Balanced Scorecard result. Objectives are determined by agreement between the line managers and employees and are aligned to EID's corporate objectives.

B.1.3.3 Main characteristics of supplementary pension or early retirement schemes for the members of the administrative, management or supervisory body and other key function holders

The Company's pension plan, a Defined Contribution Scheme, which is provided to local employees is funded entirely by the Company.

The Company pays Pension scheme contributions for eligible employees.

The employees can contribute AVC's (Additional Voluntary Contributions) which can be a fixed amount or percentage of salary. These payments are a tax-efficient way of saving.

There are no early retirement schemes currently in place at the Company.

B.1.3.4 Material transactions during the reporting period with shareholders, with persons who exercise a significant influence on the undertaking, and with members of the administrative, management or supervisory body.

There were no contracts in relation to the business of the Company in which the directors had any interest, as defined by the Companies Act, 2015, at any time during the year ended 31 December 2019.

B.2 Fit and proper requirements

B.2.1 Requirements for skills, knowledge and expertise

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

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

Guidance for (Re) Insurance Undertakings on the Fitness & Probity Amendments 2015 further assist companies in complying with their obligations brought in by the Solvency II (European Union (Insurance and Reinsurance) Regulations 2015 S.I. 485 of 2015 and S.I. No 545 of 2015).

A Guidance on Fitness and Probity Standards was issue by CBI in 2018, assisting the company in complying with the obligations under Section 21 of the Act (Central Bank Reform Act 2010) in relation to the F & P Standards.

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

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

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

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

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

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

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

B.3.1 Risk management system

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

The Company performs an Own Risk and Solvency Assessment ("ORSA") at least annually. The main purpose of performing the ORSA is to ensure that the Company

engages in a process of assessing all risks inherent in the business and determining the corresponding capital needs.

In order to ensure effective risk governance, the Company has developed a robust risk management system to identify, assess, manage and monitor and report exposure to risk. This is an ongoing process that is subject to continuous review and development.

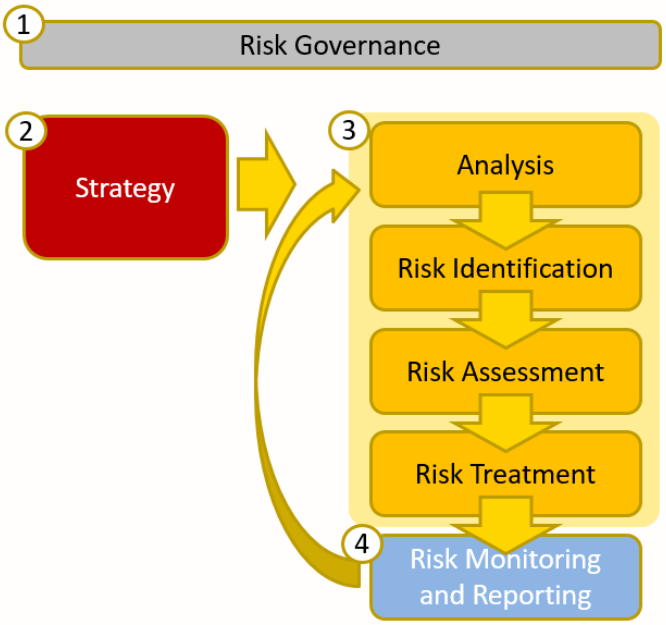
The Company's Risk Management process comprises four macro categories:

- Risk Governance;
- Risk Strategy;
- Risk Assessment and Treatment;
- Risk Monitoring and Reporting.

Risk Appetite
Following the identification of the key risk types detailed in the risk management strategy, the risk appetite is the risk range that the Company is prepared to accept in order to achieve the Company's strategic objectives.

Risk Management Policies
The company has approved the Risk Management policy that regulates the Risk Management activities and defines the evaluation methodologies.

Risk Register
The Risk Register is used to document, assess and monitor the risks that threaten the strategic objectives of the Company.
In addition to documenting the assessment of the Company's risks, these risks form the basis for the selection of stress scenarios in the Own Risk and Solvency Assessment (ORSA) process.



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

B.3.2 Implementation of the Risk management system

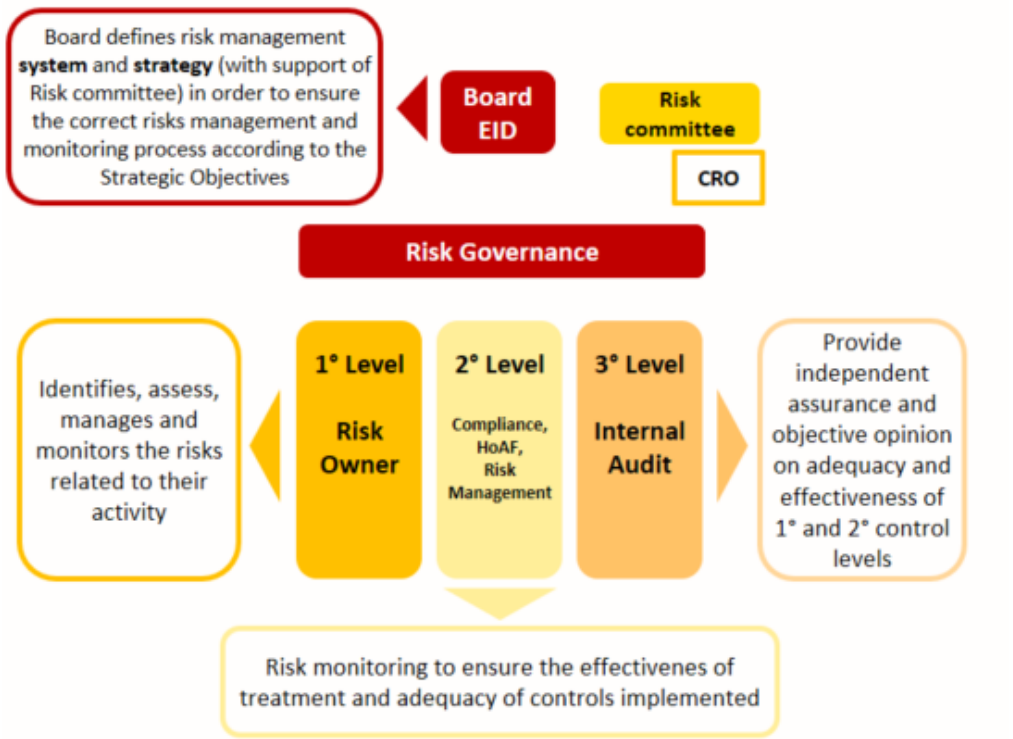
The Company recognizes the need to have appropriate governance, monitoring and reporting processes and procedures which enable the Company to identify, assess, manage, monitor and report the risks it is or might be exposed to.

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

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

The Risk Management Model is part of the Internal Control System and Risk Management, with Risk Governance based on three levels of defence:

- Risk Owner;
- Key Functions;
- Internal Auditor.



B.3.3 ORSA

B.3.3.1 ORSA process

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

In designing the ORSA, the Company incorporates its risks and their implications into short and long term decision making. The assessment approach is conducted on an enterprise and integrated basis, and includes a Risk Appetite Statement, a Risk Assessment and a Capital Management and Business Strategy.

The Company has adopted the following approach to the ORSA process:

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

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

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

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

Forecast Business Activities, Risk Profile, Capital and Solvency: An analysis is undertaken of the forecast business activities and the associated risk profile (quantitative and qualitative), a calculation and analysis of regulatory and economic capital is also undertaken as well as an analysis of the solvency margin cover while a description and assessment of risk mitigation techniques is prepared.

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

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

Actuarial: The Company's Head of Actuarial Function role and responsibilities include the calculation of the Company's technical provisions and support in relation to the standard model. The HoAF also contributes to the effective implementation of EID's risk management system providing the risk management function with their perspective on the elements of the solvency capital requirements calculation that are within their area of expertise.The HoAF provides an annual actuarial opinion to the Board regarding the range of risks and the adequacy of the scenarios, including financial provisions, considered as part of each ORSA process.

Reporting: A report is generated following the completion of every Own Risk and Solvency Assessment. The report will act as a record of each assessment.

B.3.3.2 ORSA review and approval process

The results and conclusions from each internal ORSA assessment report are reviewed and challenged by the Company Board, and this may result in revision and reworking of the report.

Once the Company Board approves the final draft of the assessment report, the Medium-High Risk own-risk and solvency assessment supervisory report ('ORSA supervisory report) is submitted to the CBI.

The final report is then circulated to all relevant Company staff.

The results and conclusions from each ORSA are reviewed against relevant Company policies and procedures as part of the Risk Management Framework.

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

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

EID acknowledges the application of the standard formula implies limitations, as it doesn't allow to take into account some risks like strategy and reputation risk, however the standard formula leads to a conservative position in terms of Solvency Capital Requirement, on top of which EID has adequate additional capital to cover those risks that are not specifically quantified by the model.

A four-year base case projection of the Solvency II Balance Sheets and Solvency Capital Requirements position is produced using the standard formula. The results are subject to a range of scenario testing that is reviewed by management and challenged by the Board and, where appropriate, potential management actions are noted and conclusions drawn as part of the ORSA process.

The Company has sufficient capital to meet its base case SCR for its current and projected business activities over the four-year business planning horizon.

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

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

B.4 Internal Control System

B.4.1 Description of the internal control system

The Company ensures that appropriate levels of internal control are present within the organizational structure. This is achieved by ensuring the presence and application of individual internal policies, procedures and guidelines for each of the critical functions and activities of the Company. Operational controls address matters such as segregation of duties, physical access and IT access controls.

The Company utilizes an integrated internal control and risk management system, based on tools and information flow. All Company employees have to respect the Code of Ethics that details the code of conduct for loyal and fair Company business management. The Company has adopted a set of rules on internal Control and the Risk Management System, with their guidelines approved by the Board of Directors, detailing tasks, responsibilities and activities.

The Financial Information System is a fundamental part of the Company's internal control system The systems objective is to provide with reasonable certainty and reliability financial information and to have the capability to prepare Financial Statements in accordance with accounting principles.

The System of Governance's three main levels of defense, aside from the Board of Directors and the various internal Committees are:

- The Risk owners (1st Level of control)
- The Key Control Functions (2nd Level of control)
- Internal Audit (3rd Level of control)

B.4.2 Implementation of the compliance function

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

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

The objective of the Board in appointing a Head of Compliance is to:

- Assist the Board with ensuring ongoing compliance with legislation and applicable requirements;
- Enhance the Company's awareness of compliance matters;
- Monitor the understanding of the legal and regulatory environment;
- Manage compliance obligations (e.g. breach reporting);
- Communicate and manage of the annual Compliance Plan;
- Review staff training processes so as to ensure appropriate compliance competencies.

The Head of Compliance presents annually the following Statements to the Board of Directors:

- Compliance,
- Corporate Governance and a
- Fitness and Probity Statement informing about effectiveness of compliance to the regulatory requirements.

B.5 Internal audit function

The Head of internal Audit has changed during 2019 as follows:

- Sergio Gatti was Head of internal audit up to the 9th July 2019
- Francesco Di Marzo is Head of internal Audit from the 9th of July 2019

B.5.1 Implementation of the internal audit function

The Company has outsourced its Internal Audit Function to Eni SpA (Support Function). The internal audit function possesses a remit to provide reasonable assurance as to the effectiveness and efficiency of the overall control environment to Management and the Company's Audit Committee of the Board of Directors. The Head of Internal Audit reports to the Company's Board of Directors.

In this regard, Internal Audit engages with management as an independent and objective business partner in identifying and assessing the priority of business risks.

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

- Examine and evaluate the policies, procedures and systems which are in place to ensure:
  - Effective and efficient operations;
  - Reliable financial reporting and integrity of information;
  - Compliance with applicable legal and regulatory requirements;
  - Safeguarding of assets; and,
  - Effective internal control practices are employed.
- Provide management with advice and recommendations on controls over their business operations and processes;
- Provide management with advice and recommendations to improve the reliability, integrity and security of management and financial information;
- Coordinate with the external auditors to ensure key risks are addressed and to ensure audit duplication is avoided whenever possible;
- Assist management in ascertaining the extent of compliance with applicable laws and regulation to which the Company is subject or will be subject; and,
- Communicate the principles of the risk-based audit approach and the basis of the Audit Plan to Company management and the Audit Committee.

B.5.2 Independence of the internal audit function.

The function provides independent and objective assurance services, via an Internal Audit Agreement between the Company and Eni SpA (Support Function).

B.6 Actuarial function

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

EID designated Tom Jowett, as their HoAF, CBI authorized the appointment with letter of March 6, 2020.

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

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

B.7 Outsourcing

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

- Definition of outsourcing and critical outsourcing;
- Board and Management responsibility;
- Due Diligence;
- Service Level Agreements;
- Management and control of the Outsourcing Relationship;
- Final approval;
- Compliance.

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

An assessment on Company's outsourced service provider, defined the following two companies as key critical activities outsourcer: Marsh for Actuarial Services and Eni SpA as Internal Audit and for IT Services.

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

Critical Outsourcing Arrangements				
Outsourcing Provider	**Service Outsourced**	**Internal/ External**	**Jurisdiction**	**Outsourcing Oversight**
Eni SpA Support Function	IT Service	Internal	EU	General Manager (PCF-1 & 8)
Eni SpA Support Function	Internal Audit Function	Internal	EU	
Marsh Limited	Head of Actuarial Function	External	UK	

Other important service providers are Deloitte for payroll services and Banque Eni for financial and payment services.

B.8 Any other information

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

The Company has assessed its corporate governance system and has concluded that it effectively provides for the sound and prudent management of the business, in a

manner that is proportionate to the nature, scale and complexity of operations of the Company.
No material changes regarding the system of governance of the Company took place, since preparation of the last SFCR Report.

C RISK PROFILE

C.1 Underwriting risk

C.1.1 Key underwriting risks

Underwriting risk at 31 December 2019 comprises 70% of the undiversified basic SCR.

The key underwriting risks to which the Company is exposed to are set out below:

Non-life premium and reserve risk

Underwriting risk arises from two sources – premium risk (pricing) and adverse claims development (reserve risk).

For a non-life (re)insurer, underwriting risk is the risk arising from non-life (re)insurance obligations in relation to the perils covered and the processes used in the conduct of business.

There are a number of material risks that are considered as a result of the Company's (re)insurance underwriting activity.

For premium risk, the Company has considered the risk of under-pricing of premiums resulting in higher loss ratios than expected. The Board of Directors has approved an underwriting policy that establishes the standards and the limitations regarding the Company's underwriting activities.

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

For reserve risk, the Company has considered the risk of over- and under-reserving for actual and expected claims as part of the evaluation and calculation of the SCR.

Non-life catastrophe risk

The risk of a major natural or man-made event occurring is considered as part of the Company's reinsurance policy and arrangements.

For natural catastrophe exposures within the EEA, a capital charge is calculated for each peril with reference to the insured values within each country. The overall capital charge is the aggregation of the capital charges by country and by peril, taking into consideration diversification effects. A similar approach is taken for the man-made catastrophes, except the scenarios are defined by exposure type and cover all regions. For natural catastrophe exposures outside the EEA, the catastrophe charge is based on premium by peril in each region.

The catastrophe risk charge for the Company comprises natural catastrophe risk across all perils (Windstorm, Earthquake, Flood, Hail and Subsidence) within and outside the EEA, man-made catastrophe risk for marine risk, aviation risk and fire and other catastrophe risk for miscellaneous financial loss and non-proportional casualty reinsurance.

C.1.2 Material Risk Concentrations

Underwriting risk is diversified across a number of lines of business and geographical areas. See Section A.2 of this report for further details.

The Company notes that in respect of its Property risk specifically a high concentration of risk exists in the insured values of certain insured entities. These risk concentrations are managed in the context of the overall underwriting structure of the Company.

C.1.3 Assessment and risk mitigation techniques used for underwriting risks

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

- Having in place clear underwriting and reserving philosophies and procedures and controls in relation to pricing and reserving;
- Prospective insurance programmes are evaluated using historical data for the programmes and taking into account the Company's own knowledge and experience of that type of risk;
- The performance of the insurance programmes is continually monitored and corrective actions are taken, where necessary;
- The Company's reserving policy is reviewed at least once a year through a process involving the external Actuary and formal approval from the Board of Directors;
- The Company has comprehensive procedures in place to be followed for claims management. The Company has employed experienced employees to manage claims on a day to day basis. The Company has put in place a set of internal controls which are reviewed on a regular basis;
- Retaining risk within an approved risk appetite and solvency requirements;
- Monitoring changing environment and market conditions that affect risk;
- Quarterly performance reporting highlighting performance of key underwriting metrics (KRIs);
- Using reinsurance to reduce underwriting risk;
- The ORSA includes stress and scenario testing which is used to assess the risks under stressed conditions;
- Independent opinions on the reasonableness and adequacy of the overall underwriting policy, technical provisions and reinsurance arrangements are provided by the Head of Actuarial Function on an annual basis.

C.2 Market risk

C.2.1 Material market risks

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

Investments objectives are outlined in the Company's Investment Policy Guidelines and Objectives. Key risk considerations in development of the guidelines include: permitted investment classes, derivative usage, credit risk, market risk,

concentration risk, liquidity risk, asset liability management and interest rate sensitivity.

The table below outlines the material components of the market risk module as at 31 December 2019.

Market Risk	€' 000
Concentration	52,412
Spread	17,240
Interest rate	5,857
Currency	1,087
Equity	7

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

Concentration risk is a product of the investments held, being the deposit accounts, fixed income securities and bonds.

Spread Risk: the sensitivity of the value of investments, primarily bonds and deposits in respect of the Company, to changes in the level or in the volatility of credit spreads.

Spread risk is also a product of the investments held, being the deposit accounts fixed income securities and bonds.

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

Interest rate risk arises primarily from the Company's bond/securities portfolio and the settlement of future claims.

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

The assets held in other currencies are not material to the overall charge.

C.2.2 Material Risk Concentrations

Market risk concentration arises in respect of the deposits with credit institutions and the bonds/securities. However, the Company continues to hold a well-diversified bond/securities portfolio to ensure there is no over concentration of material market risks.

C.2.3 Prudent person principle applied to market risks

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

C.2.4 Assessment and risk mitigation techniques used for market risks

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

- Compliance with the investment policies and guidelines as approved by the Company's Board of Directors;
- Quarterly KRIs
- Retaining risk within an approved risk appetite and solvency requirements;
- Monitoring changing environment and market conditions that affect risk;
- Diversifying and limiting investment risk through ongoing review and management metrics;
- The ORSA includes stress and scenario testing which is used to assess the risks under stressed conditions.

C.3 Credit risk

C.3.1 Material credit risks

Credit risk at 31 December 2019 comprises 14% of the undiversified basic SCR.

Credit risk is the risk that the Company is exposed to lower returns or loss if another party fails to perform its financial obligations towards the Company.
The counterparty default risk module in the Standard Formula is mainly driven by cash at bank and the reinsurer's share of technical provisions and risk mitigation.

Reinsurance counterparties:

The key reinsurance counterparty with which the Company has a treaty (OIL) is highly rated and has a credit quality step of 2.

Banking counterparties:

Cash at bank is kept to a minimum and invested with highly reputable and creditworthy institutions.

C.3.2 Material Risk Concentrations

While the significant reinsurance provided by OIL could be considered a material risk concentration to the Company, this is mitigated by the long term, stable and trustworthy nature of the relationship between the Company and OIL and the fact that they possess a high credit rating.

C.3.3 Prudent person principle applied to credit risks

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

C.3.4 Assessment and risk mitigation techniques used for credit risks

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

- Compliance with the investment policies and guidelines as approved by the Company's Board of Directors;
- Compliance with the reinsurance strategy (minimum annual review of existing reinsurance cover and the minimum credit ratings of reinsurers);
- Retaining risk within an approved risk appetite and solvency requirements;
- Quarterly KRIs
- Monitoring changing environment and market conditions that affect risk;
- Reinsurer credit rating is monitored in the Company's Key Risk Indicators (KRIs);
- The ORSA includes stress and scenario testing which is used to assess the risks under stressed conditions.

C.4 Liquidity risk

C.4.1 Material liquidity risks

The Company has considered the risk of a lack of liquidity available to pay claimants and has determined that no specific allocation of capital is considered necessary for this risk. The Board considers that this risk is adequately addressed through its specified strategic solvency target.

Liquidity objectives and constraints are outlined in the Company's Investment Policy Guidelines and Objectives.

C.4.2 Prudent person principle applied to liquidity risks

The investment assets are prudently invested taking into account the liquidity requirements of the business and the nature and timing of the insurance liabilities. The investment funds are primarily publicly traded securities which can be liquidated without significant impact over a period of several months or less.

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

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

- Compliance with the investment policies and guidelines as approved by the Company's Board of Directors;
- Retaining risk within an approved risk appetite and solvency requirements;
- Monitoring changing environment and market conditions that affect risk;
- Forecasts are prepared regularly to predict required liquidity levels over both the short and medium term.

C.5 Operational risk

C.5.1 Material operational risks

Operational risks are addressed in the capital requirement as an addition to the BSCR to the extent that they have not been explicitly covered in other risk modules. The operational risk capital charge as at 31 December 2019 is €16.4 million (2018: €18.5m).

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

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

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

- Internal controls;
- Monitoring and internal reporting;
- Business continuity plans;
- High standards of ethics and integrity through a Code of Ethics;
- Commitment to effective corporate governance.

C.6 Other material risks

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

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

C.7 Any Other information

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

The expected profit included in future premiums is calculated as the difference between the technical provisions without a risk margin and a calculation of the technical provisions without a risk margin under the assumption that the premiums relating to existing insurance and reinsurance contracts that are expected to be received in the future are not received. This amount as at 31 December 2019 is EUR 4.1m (2018: EUR 12.5m).

The Company's ORSA contains six scenarios and a reverse stress test, which reflect stresses on underwriting risk, counterparty and credit risk and reinsurance risk (based on the largest risks per the Company's risk register).

The results of the stress testing conducted during 2019 indicate that the Company is well capitalised at present and is projected to have sufficient own funds to meet its overall solvency needs throughout the projection period. No further general

management actions are required outside of the existing reporting and monitoring controls that are in place.

In the event of capital being required, the Company's shareholder and ultimate parent company have demonstrated their commitment to maintaining the required capital levels within the Company.

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

D VALUATION for SOLVENCY PURPOSES

D.1 Assets

D.1.1 Local GAAP and Solvency II Valuations

The table below sets out the value of the Company's assets as at 31 December 2019:

	31/12/2019		
	Assets per GAAP €'000	Assets per Solvency II €'000	Difference €'000
Shares and other variable yield securities (OIL/OCIL)	13 €	13 €	0 €
Bonds/ Debt and Other Fixed Income Securities	684.868 €	684.868 €	0 €
Deposits other than cash equivalents	249.026 €	249.026 €	0 €
Cash at Bank	15.652 €	15.652 €	0 €
Reinsurance recoverables	167.162 €	205.246 €	38.084 €
Insurance and reinsurance receivables	78.454 €	79.303 €	849 €
Other assets	49.423 €	12.561 €	-36.862 €
Deferred Acquisition Costs	3.200 €	0 €	-3.200 €
Deferred Tax Asset	0 €	0 €	0 €
Total assets	**1.247.798**	**1.246.669**	**-1.129**

	31/12/2018		
	Assets per GAAP €'000	Assets per Solvency II €'000	Difference €'000
Shares and other variable yield securities (OIL/OCIL)	13	13	0
Bonds/ Debt and Other Fixed Income Securities	706.398	706.398	0
Deposits other than cash equivalents	248.814	248.814	0
Cash at Bank	12.670	12.670	0
Reinsurance recoverables	274.552	243.328	-31.224
Insurance and reinsurance receivables	62.227	66.041	3.814
Other assets	52.276	8.641	-43.635
Deferred Acquisition Costs	4.408	0	-4.408
Deferred Tax Asset	0	0	0
Total assets	**1.361.360**	**1.285.907**	**-75.453**

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

Government and corporate bonds/securities

Debt securities and other fixed interest securities are carried at market value, which are all listed bonds. Realised gains and losses on investments carried at market value are calculated as the difference between net sales proceeds and purchase price. Movements in unrealised gains and losses on investments represent the difference between the valuation at the balance sheet date and the purchase price or, if they are previously valued, the valuation at the last balance sheet date, together with the reversal of unrealised gains and losses recognised in earlier accounting periods in respect of investment disposals in the current period. Income from investments is included on an accruals basis. All financial assets are recognised measured and valued according to Irish GAAPs and IFRS principles.

Cash at Bank/Deposits other than cash equivalents

Cash and cash equivalents comprise cash on hand and demand deposits and other short-term highly liquid investments that are readily convertible to a known amount of cash and are subject to an insignificant risk of changes in value.

Reinsurance recoverables

Reinsurance recoverables are comprised of the reinsurer's share of unearned premiums and a provision for amounts recoverable from the related reinsurance contract.

Adjustments for solvency purposes relates to the application of the Solvency II best estimate valuation. The fair value of these combined technical provisions is calculated by discounting estimated future cash-flows (best estimates) based on estimated duration of each provision (payment pattern), using the risk-free interest rates curve. An adjustment for reinsurer default is then applied.

Deferred acquisition costs

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

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

Insurance and reinsurance receivables

The Company statutory accounts balance sheet includes insurance and reinsurance receivables. Adjustments to insurance and reinsurance receivables for Solvency II purposes are applied in order to split those receivables in such a way that credit risk can be applied by counterparty or by due date as is applicable. Certain receivables balances have been split to remove netted liability balances which have been reallocated to insurance and reinsurance payables.

Deferred tax asset

The Company has not recorded a deferred tax asset in the current year as the cash flows from their relevant Basic Own Funds items result in an increase in available capital when moving from Irish GAAP to Solvency II, excluding proposed dividend distribution and the Company has therefore recognised future tax payable on this capital.

Other Assets

The GAAP balance sheet includes a liability item in relation to a Theoretical Withdrawal Premium (TWP) from OIL (2019 €111.2 million, 2018 €129.8 million). There is also a partially offsetting asset, related to TWP receivables from other EID Group companies (2019 €36.9 million, 2018 €43.6 million). Under Solvency II, material contingent liabilities have to be recognised as liabilities, valued based on

the expected present value of future cash-flows required to settle the contingent liability.

For the Solvency II balance sheet the Company takes the assumption that it is unlikely that EID will cancel its reinsurance policy with OIL, and have anticipated a zero future cash-flow for the purposes of the Solvency II balance sheet. The offsetting asset of €36.9 million has therefore been removed from Other Assets.

D.2 Technical Provisions

D.2.1 Irish GAAP and Solvency II Valuations

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

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

Internal Line of Business	Solvency II Class of Business
General Liability	General Liability
Fire	Fire and other damage to property
Other PL	Fire and other damage to property
Cargo	Marine, aviation and transport
H&M	Marine, aviation and transport
BI	Miscellaneous financial loss
Marine	Marine, aviation and transport
Credit	Credit and suretyship

The table below shows an analysis of the gross technical provisions as at 31 December 2019:

Insurance Class	31/12/2019 TPs per GAAP €'000	TPs per Solvency II €'000	Difference €'000
Fire and Other Damage to Property			
Best estimate of liabilities (BEL)	358,342	382,688	24,346
Risk margin	0	34,085	34,085
General Liability			
Best estimate of liabilities (BEL)	69,031	59,793	-9,238
Risk margin	0	8,348	8,348
Credit & Suretyship			
Best estimate of liabilities (BEL)	3,136	1,986	-1,150
Risk margin	0	948	948
Marine, Aviation and Transport			
Best estimate of liabilities (BEL)	2,383	754	-1,629
Risk margin	0	582	582
Miscellaneous Financial Loss			
Best estimate of liabilities (BEL)	80,173	102,977	22,804
Risk margin	0	9,312	9,312
Total technical provisions	**513,065**	**601,473**	**88,408**

The table below shows an analysis of the gross technical provisions as at 31 December 2018:

Insurance Class	31/12/2018 TPs per GAAP €'000	TPs per Solvency II €'000	Difference €'000
Fire and Other Damage to Property			
Best estimate of liabilities (BEL)	531.233	528.254	-2.979
Risk margin	0	44.406	44.406
General Liability			
Best estimate of liabilities (BEL)	64.262	62.752	-1.510
Risk margin	0	8.289	8.289
Credit & Suretyship			
Best estimate of liabilities (BEL)	1.919	1.527	-392
Risk margin	0	681	681
Marine, Aviation and Transport			
Best estimate of liabilities (BEL)	4.545	4.150	-395
Risk margin	0	1.586	1.586
Miscellaneous Financial Loss			
Best estimate of liabilities (BEL)	43.495	19.598	-23.897
Risk margin	0	1.805	1.805
Total technical provisions	**645.453**	**673.048**	**27.595**

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

The Solvency II technical provisions are made up of a best estimate of the claims, premiums and expenses cash flows that are discounted to give an estimate of the provisions. A risk margin is then added.

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

Cash-flows and discounting: Cash-flows have been discounted using the Euro risk free yield curve as at 31 December 2019 as published by the European Insurance and Occupational Pensions Authority ("EIOPA").

Inclusion of unearned business: The expected claims on unearned business have been calculated using an expected loss ratio applied to the gross of reinsurance unearned premium reserve.

Inclusion of written but not incepted business: The expected claims on written but not incepted business have been calculated using an expected loss ratio applied to the gross of anticipated premium inflows and allowing for expenses incurred in assessing the profitability of that business including placement expenses and the administrative expenses for the coming 12 months.

Expenses: An allowance has been made for claims handling and unallocated expenses in the servicing of the claims liabilities estimated.

Risk Margin

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

The annual cost of capital is taken to be 6% of the capital estimated at each future point, discounted to the valuation date using the same risk free yield curve as that used to determine the best estimate technical provisions.

D.2.2 Uncertainty associated with the value of Technical Provisions

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

- The actual amounts required to meet future claim payments may differ from estimates for a number of reasons, such as model specification error, parameter error and random error inherent uncertainty in insurance.

External environment risk factors may cause material deviations in our estimates of technical provisions. Significant external risk factors include:

- Persistent negative interest rates: negative rates could translate into deeper negative discounting factors for the calculation of Technical Provisions, which could distort any subsequent analysis of these provision calculation results. Further, negative interest rates could imply a negative interest income from the cash at bank.
- Inflation: any significant increase in the consumer price index could lead to the unallocated loss adjustment expenses (ULAE) increasing by more than what had originally been forecast. Claims inflation could translate into future claims being settled at a higher level than in the past, notably for the General Liability class due to the typically longer time to settlement of claims.
- Sudden changes in business volumes.

D.2.3 Solvency II and local GAAP valuation differences of Technical Provisions by material line of business. See analysis in Section D2.1.

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

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

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

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

D.2.8 Recoverables from reinsurance and special purpose vehicles

Total reinsurance recoverables at 31 December 2019 were €167.2 million.

In line with the Solvency II valuation basis as outlined in Section D2.1 these recoverables have been adjusted in order that they form the best estimate of future cashflows on a Solvency II basis.

The table below shows an analysis of the ceded technical provisions as at 31 December 2019:

Insurance Class – Best Estimate Recoverables	31/12/2019 TPs per GAAP €'000	TPs per Solvency II €'000	Difference €'000
Fire and Other Damage to Property	96.510	107.557	11.047
General Liability	2.675	-2.161	-4.836
Credit & Suretyship	516	475	-41
Marine, Aviation and Transport	18	1.129	1.111
Miscellaneous Financial Loss	67.443	98.245	30.802
Total technical provisions	**167.162**	**205.246**	**38.083**

The table below shows an analysis of the ceded technical provisions as at 31 December 2018:

Insurance Class – Best Estimate Recoverables	31/12/2018 TPs per GAAP €'000	TPs per Solvency II €'000	Difference €'000
Fire and Other Damage to Property	240.054	229.528	-10.526
General Liability	2.678	-5.417	-8.095
Credit & Suretyship	1.251	805	-446
Marine, Aviation and Transport	3.818	4.609	791
Miscellaneous Financial Loss	26.753	13.803	-12.950
Total technical provisions	**274.553**	**243.328**	**-31.226**

D.3 Other liabilities

The table below shows an analysis of Creditors:

Creditors 2019	GAAP €'000	Solvency II €'000	Change €'000
Creditors arising out of insurance operations	19,284	19,388	**103**
Creditors arising out of reinsurance operations	16,060	16,806	**746**
Any other liabilities, not elsewhere shown	115,442	4,227	**-111,215**
Total Creditors	**150,786**	**40,421**	**-110,365**

Creditors 2018	GAAP €'000	Solvency II €'000	Change €'000
Creditors arising out of insurance operations	6.180	9.994	**3.814**
Creditors arising out of reinsurance operations	6.325	6.325	**0**
Any other liabilities, not elsewhere shown	136.191	6.300	**-129.891**
Total Creditors	**18.789**	**22.619**	**-126.077**

D.4 Alternative Methods for Valuation

The Company does not use any alternative methods for valuation.

D.5 Any Other Information

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

No changes were introduced to the recognition and valuation bases used or to estimations during the year aside from those referred to in Section 1.1.

E CAPITAL MANAGEMENT

E.1 Own funds

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

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

The Company is a single shareholder entity whose ordinary shares are fully paid up. It has no debt financing nor does it have plans to raise debt or issue new shares capital over the four-year time horizon used for business planning. The medium-term capital management plan set by the Board is as follows:

- Current capital management is to conservatively manage the capital in accordance with the Company's Investment Policy Guidelines and Objectives;
- There is no short, medium or long term policy to pay a dividend. However, as part of its capital management strategy, the Company shall consider, on an annual basis, its ability to pay a dividend to the sole shareholder;
- Own funds to be maintained at a sufficient level in excess of the SCR.

E.1.2 Own funds analysed by tiers

An analysis of own funds is shown below:

Date	Description	Tier 1 €' 000	Tier 2 €' 000	Tier 3 €' 000	Total €' 000
01-Jan-19	**Opening balance comprising:**				
	Ordinary share capital	500,000	-	-	**500,000**
	Reconciliation reserve	38,603			**38,603**
	Movement in the Reconciliation reserve (comprising retained earnings and Solvency II adjustments) for the year ended 31 December 2019	-1,839	-	-	-1,839
	Deferred Tax Asset				
31-Dec-19	**Closing balance**	**536,764**	**-**	**-**	**536,764**
	Represented by:				
	Ordinary share capital	500,000	-	-	500,000
	Deferred Tax Asset		-	-	-
	Reconciliation reserve	36,764			36,764
	Total Basic own funds after deductions	**536,764**	**-**	**-**	**536,764**

Date	Description	Tier 1 €' 000	Tier 2 €' 000	Tier 3 €' 000	Total €' 000
01-Jan-18	**Opening balance comprising:**				
	Ordinary share capital	500,000	-	-	**500,000**
	Reconciliation reserve	12,476			**12,476**
	Deferred Tax Asset			758	**758**
	Movement in the Reconciliation reserve (comprising retained earnings and Solvency II adjustments) for the year ended 31 December 2018	25,827			25,827
	Deferred Tax Asset			-758	-758
31-Dec-18	**Closing balance**	**538,603**	**-**	**-**	**538,603**
	Represented by:				
	Ordinary share capital	500,000			500,000
	Deferred Tax Asset		-	-	-
	Reconciliation reserve	38,603			38,603
	Total Basic own funds after deductions	**538,603**	**-**	**-**	**538,603**

The Company's ordinary share capital and reconciliation reserve are made up of tier 1 unrestricted own funds of €536,8 million as per Article 69 (a)(1) of the Delegated Regulation. The reconciliation reserve equals the excess of liabilities over assets less other basic own fund items, as at the reporting date. ENI Insurance DAC recommended to the sole member the distribution of a dividend of €65,4 million (profit for year ended 31 December 2019). The Company has no tier 1 restricted own funds.

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

The eligible amount of own funds to cover the Solvency Capital Requirement is €536.8 million. This is comprised of Tier 1 unrestricted Basic Own Funds of €536.8 million.

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

The eligible amount of own funds to cover the Solvency Capital Requirement is €536.8 million. This is comprised of Tier 1 unrestricted Basic Own Funds of €536.8 million.

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

The following table reconciles the differences (reconciliation reserve) between the equity in the financial statements and the excess of the assets over liabilities as calculated for solvency purposes.

Reconciliation of Basic Own Funds to Equity as per financial statements as at 31 December 2019	€'000
Solvency II - Basic Own Funds	536,764
Total Equity as per financial statements	583,947
Difference:	**-47,183**

Represented by:	
Difference between Net Technical Provisions and BEL	2,950
Risk Margin	-53,275
Technical Withdrawal Provision release	74,353
Deferred tax liability	-2,604
Deferred acquisition costs	-3,200
Foreseeable dividends and distributions	-65,408
Difference:	**-47,183**

Reconciliation of Basic Own Funds to Equity as per financial statements as at 31 December 2018	€'000
Solvency II - Basic Own Funds	538,603
Total Equity as per financial statements	567,311
Difference:	**-28,708**

Represented by:	
Difference between Net Technical Provisions and BEL	-2,052
Risk Margin	-56,767
Technical Withdrawal Provision release	86,156
Deferred tax liability	-2,866
Deferred acquisition costs	-4,408
Foreseeable dividends and distributions	-48,771
Difference:	**-28,708**

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

E.1.7 There are no Tier 3 funds at the balance sheet date.

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

E.2 Solvency Capital Requirement and Minimum Capital Requirement

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

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

	€'000
SCR	294,551
MCR	73,638

The table below shows the total SCR and MCR at 31 December 2018:

	€'000
SCR	265,979
MCR	66,495

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

E.2.2 Solvency Capital Requirement split by risk modules

The table below shows the SCR components by risk module (using the Standard Formula) at 31 December 2019.

	2019 €'000	2018 €'000
Market risk	55,610	65,492
Counterparty default risk	48,306	56,529
Non-life underwriting risk	243,383	227,685
Diversification	-56,561	-64,218
Basic Solvency Capital Requirement	**290,738**	**285,488**
Operational Risk	16,446	18,488
Loss Absorbing Capacity of Deferred Taxes	-12,633	-37,997
Overall Solvency Capital Requirement	**294,551**	**265,979**
Available Capital	**536,764**	**538,603**
SCR Cover	**182%**	**202%**

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

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

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

The table below shows the inputs into the MCR calculation as at 31 December 2019.

Minimum Capital Requirement (MCR)

MCR	73,637,705

Total MCR NL	43,668,925
Cap	132,547,868
Floor	73,637,705

Parameters	
Cap	45%
Floor	25%
AMCR	3,700,000

Line of Business	Net Technical Provisions	Net Premium Written	Paremeters		MCR NL
			α	β	
Medical Expense	0	0	5%	5%	0
Income Protection	0	0	13%	9%	0
Workers' Compensation	0	0	11%	8%	0
Motor Vehicle Liability	0	0	9%	9%	0
Other Motor	0	0	8%	8%	0
Marine, Aviation & Transport	0	2,698,965	10%	14%	377,855
Fire & Other Damage to Property	275,130,778	106,455,292	9%	8%	33,846,440
General liability insurance	61,953,295	11,033,886	10%	13%	7,826,629
Credit & Suretyship	1,510,876	4,162,770	18%	11%	737,818
Legal Expenses	0	0	11%	7%	0
Assistance	0	0	19%	9%	0
Miscellaneous Financial Loss	4,732,168	0	19%	12%	880,183
NPR - Health	0	0	19%	16%	0
NRP - Property	0	0	19%	16%	0
NPR - Casualty	0	0	19%	16%	0
NPR - Marine, Aviation & Transport	0	0	19%	16%	0

The table below shows the inputs into the MCR calculation as at 31 December 2018.

Minimum Capital Requirement (MCR)

MCR	67,430,796

Total MCR NL	47,505,542
Cap	121,375,433
Floor	67,430,796

Parameters	
Cap	45%
Floor	25%
AMCR	3,700,000

Line of Business	Net Technical Provisions	Net Premium Written	Paremeters		MCR NL
			α	β	
Medical Expense	0	0	5%	5%	0
Income Protection	0	0	13%	9%	0
Workers' Compensation	0	0	11%	8%	0
Motor Vehicle Liability	0	0	9%	9%	0
Other Motor	0	0	8%	8%	0
Marine, Aviation & Transport	0	2,761,743	10%	14%	386,644
Fire & Other Damage to Property	298,726,012	120,695,651	9%	8%	37,132,419
General liability insurance	68,168,813	10,763,868	10%	13%	8,431,454
Credit & Suretyship	721,649	3,090,964	18%	11%	477,011
Legal Expenses	0	0	11%	7%	0
Assistance	0	0	19%	9%	0
Miscellaneous Financial Loss	5,795,771	0	19%	12%	1,078,013
NPR - Health	0	0	19%	16%	0
NRP - Property	0	0	19%	16%	0
NPR - Casualty	0	0	19%	16%	0
NPR - Marine, Aviation & Transport	0	0	19%	16%	0

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

E.3 Use of the duration-based equity risk sub-module in the calculation of the SCR

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

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

Taking into account the nature, scale and complexity of the Company the standard formula has been used for the assessment of the Company's Solvency Needs (SCR) instead of an internal model.

The Company assesses the Data Quality in the SCR process under the headings of Accuracy, Completeness and Appropriateness.
In sourcing and treating the data used for SCR calculation the Company ensures the data used is free from material error, consistent across time periods and reconciles back to verifiable source data where at all possible. Where judgements or limitations in

respect of the data have been used it is noted in the deliverable document. The completeness and appropriateness means to ensure that the information used is sufficient in its nature and granularity to appropriately reflect the risks of the Company.

E.5 Non-compliance with the MCR and non- compliance with the SCR

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

E.6 Any other information.

ENI Insurance DAC recommended to the sole member the distribution of a dividend of €65.4 million (profit for year end 31 December 2019) and disclosed this recommendation to the Central Bank of Ireland.
Considering this payment, the Solvency Coverage remains consistent with the previous year (SCR decrease of 20 pp – based on our calculation at 31st December 2019), taking into account the Loss Absorbing Capacity of deferred taxes review after a new amendment to Delegated Acts was issued in March 2019*. The recommended dividend has been considered in conjunction with the ORSA 2019 scenarios impact and likelihood and the Board still feels comfortable that the anticipated available capital after dividend distribution of €536.8m is sufficient to meet the short to medium term capital needs of the Company.

**COMMISSION DELEGATED REGULATION (EU) 2019/981 of 8 March 2019 amending Delegated Regulation (EU) 2015/35 supplementing Directive 2009/138/EC of the European Parliament and of the Council on the taking-up and pursuit of the business of Insurance and Reinsurance (Solvency II).*

QRT TEMPLATES

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

The templates are included at the end of the report.

Annex I
S.02.01.02
Balance sheet

		Solvency II value
Assets		**C0010**
Intangible assets	**R0030**	0
Deferred tax assets	**R0040**	0
Pension benefit surplus	**R0050**	0
Property, plant & equipment held for own use	**R0060**	0
Investments (other than assets held for index-linked and unit-linked contracts)	**R0070**	933,907
Property (other than for own use)	**R0080**	0
Holdings in related undertakings, including participations	**R0090**	13
Equities	**R0100**	0
Equities - listed	**R0110**	0
Equities - unlisted	**R0120**	0
Bonds	**R0130**	684,868
Government Bonds	**R0140**	326,302
Corporate Bonds	**R0150**	358,566
Structured notes	**R0160**	0
Collateralised securities	**R0170**	0
Collective Investments Undertakings	**R0180**	0
Derivatives	**R0190**	0
Deposits other than cash equivalents	**R0200**	249,026
Other investments	**R0210**	0
Assets held for index-linked and unit-linked contracts	**R0220**	0
Loans and mortgages	**R0230**	0
Loans on policies	**R0240**	0
Loans and mortgages to individuals	**R0250**	0
Other loans and mortgages	**R0260**	0
Reinsurance recoverables from:	**R0270**	205,246
Non-life and health similar to non-life	**R0280**	205,246
Non-life excluding health	**R0290**	205,246
Health similar to non-life	**R0300**	0
Life and health similar to life, excluding health and index-linked and unit-linked	**R0310**	0
Health similar to life	**R0320**	0
Life excluding health and index-linked and unit-linked	**R0330**	0
Life index-linked and unit-linked	**R0340**	0
Deposits to cedants	**R0350**	0
Insurance and intermediaries receivables	**R0360**	77,517
Reinsurance receivables	**R0370**	1,786
Receivables (trade, not insurance)	**R0380**	0
Own shares (held directly)	**R0390**	0
Amounts due in respect of own fund items or initial fund called up but not yet	**R0400**	0
Cash and cash equivalents	**R0410**	15,652
Any other assets, not elsewhere shown	**R0420**	12,561
Total assets	**R0500**	1,246,669

Liabilities		Solvency II value C0010
Technical provisions – non-life	**R0510**	601,473
Technical provisions – non-life (excluding health)	**R0520**	601,473
TP calculated as a whole	**R0530**	-
Best Estimate	**R0540**	548,198
Risk margin	**R0550**	53,275
Technical provisions - health (similar to non-life)	**R0560**	-
TP calculated as a whole	**R0570**	-
Best Estimate	**R0580**	-
Risk margin	**R0590**	-
Technical provisions - life (excluding index-linked and unit-linked)	**R0600**	-
Technical provisions - health (similar to life)	**R0610**	-
TP calculated as a whole	**R0620**	-
Best Estimate	**R0630**	-
Risk margin	**R0640**	-
Technical provisions – life (excluding health and index-linked and unit-linked)	**R0650**	-
TP calculated as a whole	**R0660**	-
Best Estimate	**R0670**	-
Risk margin	**R0680**	-
Technical provisions – index-linked and unit-linked	**R0690**	-
TP calculated as a whole	**R0700**	-
Best Estimate	**R0710**	-
Risk margin	**R0720**	-
Contingent liabilities	**R0740**	-
Provisions other than technical provisions	**R0750**	-
Pension benefit obligations	**R0760**	-
Deposits from reinsurers	**R0770**	-
Deferred tax liabilities	**R0780**	2,604
Derivatives	**R0790**	-
Debts owed to credit institutions	**R0800**	-
Financial liabilities other than debts owed to credit institutions	**R0810**	-
Insurance & intermediaries payables	**R0820**	19,388
Reinsurance payables	**R0830**	16,806
Payables (trade, not insurance)	**R0840**	-
Subordinated liabilities	**R0850**	-
Subordinated liabilities not in BOF	**R0860**	-
Subordinated liabilities in BOF	**R0870**	-
Any other liabilities, not elsewhere shown	**R0880**	4,227
Total liabilities	**R0900**	644,497
Excess of assets over liabilities	**R1000**	602,172

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

		Line of Business for: **non-life insurance and reinsurance obligations (direct**					
		Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Miscellaneous financial loss	Total
		C0060	**C0070**	**C0080**	**C0090**	**C0120**	**C0200**
Premiums written							
Gross - Direct Business	**R0110**	2,442	80,885	12,261	0	18,653	114,240
Gross - Proportional reinsurance accepted	**R0120**	358	60,513	6,364	5,919	9,319	82,474
Gross - Non-proportional reinsurance accepted	**R0130**						
Reinsurers' share	**R0140**	102	34,942	7,591	1,756	28,126	72,518
Net	**R0200**	2,699	106,455	11,034	4,163	-154	124,197
Premiums earned							
Gross - Direct Business	**R0210**	2,435	82,580	11,225	0	18,690	114,930
Gross - Proportional reinsurance accepted	**R0220**	346	65,177	6,177	5,919	9,319	86,937
Gross - Non-proportional reinsurance accepted	**R0230**						
Reinsurers' share	**R0240**	102	35,679	7,592	1,756	28,130	73,259
Net	**R0300**	2,678	112,078	9,811	4,163	-121	128,609
Claims incurred							
Gross - Direct Business	**R0310**	-235	91,520	12,502	0	40,041	143,828
Gross - Proportional reinsurance accepted	**R0320**	-32	1,054	-1,378	1,009	0	654
Gross - Non-proportional reinsurance accepted	**R0330**						
Reinsurers' share	**R0340**	-645	36,728	6,645	-139	40,000	82,589
Net	**R0400**	378	55,846	4,479	1,148	41	61,892
Changes in other technical provisions							
Gross - Direct Business	**R0410**					-	0
Gross - Proportional reinsurance accepted	**R0420**						0
Gross - Non- proportional reinsurance accepted	**R0430**						
Reinsurers'share	**R0440**						0
Net	**R0500**	0	0	0	0	0	0
Expenses incurred	**R0550**	-30	-7,082	1,883	-286	262	-5,253
Other expenses	**R1200**						5,456
Total expenses	**R1300**						204

Annex I
S.05.01.02
Non-life premiums, claims and expenses by country (Top 5 and home country)

			Home country	Top 5 countries (by amount of gross premium written) - non-life obligations					Total Top 5 and home country
			Home country	Italy	US	Norway	Congo	Kazakhstan	
Premiums written	Gross - Direct Business	R0110	0	51.148	18.061	26.045	0	0	95.254
	Gross - Proportional reinsurance accepted	R0120	0	7.296	0	0	11.649	16.620	35.565
	Gross - Non-proportional reinsurance accepted	R0130							
	Reinsurers' share	R0140	0	7.296	7.666	13.980	2.790	10.680	42.413
	Net	R0200	0	51.148	10.395	12.064	8.859	5.940	88.407
Premiums earned	Gross - Direct Business	R0210	0	51.126	18.256	26.277	0	0	95.659
	Gross - Proportional reinsurance accepted	R0220	0	7.296	0	0	10.884	16.697	34.878
	Gross - Non-proportional reinsurance accepted	R0230							
	Reinsurers' share	R0240	0	21.146	7.881	14.033	2.500	10.606	56.166
	Net	R0300	0	37.277	10.375	12.244	8.384	6.091	74.371
Claims incurred	Gross - Direct Business	R0310	0	117.611	0	(10)	0	0	117.601
	Gross - Proportional reinsurance accepted	R0320	0	1.070	47	0	104	(25.930)	(24.709)
	Gross - Non-proportional reinsurance accepted	R0330							
	Reinsurers' share	R0340	0	57.892	0	0	0	0	57.892
	Net	R0400	0	60.789	47	(10)	104	(25.930)	35.001
Changes in other technical provisions	Gross - Direct Business	R0410	0	0	0	0	0	0	0
	Gross - Proportional reinsurance accepted	R0420	0	0	0	0	0	0	0
	Gross - Non-proportional reinsurance accepted	R0430							
	Reinsurers' share	R0440	0	0	0	0	0	0	0
	Net	R0500	0	0	0	0	0	0	0
Expenses incurred		R0550	4.857	2.900	1.048	1.712	192	734	11.442
Other expenses		R1200							(12.930)
Total expenses		R1300							(1.488)

Annex I
S.17.01.02
Non-life Technical Provisions

		Direct business and accepted proportional reinsurance					
		Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Miscellaneous financial loss	Total Non-Life obligation
		C0070	C0080	C0090	C0100	C0130	C0180
Technical provisions calculated as a whole	R0010						
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole	R0050						
Technical provisions calculated as a sum of BE and RM							
Best estimate							
Premium provisions							
Gross	R0060	-1,415	40,587	-7,734	-1,304	18,508	48,642
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140	284	-2,983	-7,821	-820	14,414	3,074
Net Best Estimate of Premium Provisions	R0150	-1,699	43,570	87	-484	4,094	45,568
Claims provisions							
Gross	R0160	2,168	342,101	67,527	3,291	84,469	499,556
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240	845	110,541	5,661	1,295	83,831	202,172
Net Best Estimate of Claims Provisions	R0250	1,323	231,561	61,866	1,995	639	297,384
Total Best estimate - gross	R0260	754	382,688	59,793	1,986	102,977	548,198
Total Best estimate - net	R0270	-375	275,131	61,953	1,511	4,732	342,952
Risk margin	R0280	582	34,085	8,348	948	9,312	53,275
Amount of the transitional on Technical Provisions							
Technical Provisions calculated as a whole	R0290						
Best estimate	R0300						
Risk margin	R0310						
Technical provisions - total							
Technical provisions - total	R0320	1,335	416,773	68,140	2,934	112,289	601,473
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	R0330	1,129	107,557	-2,161	475	98,245	205,246
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	R0340	207	309,216	70,301	2,459	14,044	396,227

Annex I
S.19.01.21
Non-life Insurance Claims Information

Total Non-Life Business

Accident year / Underwriting year	Z0010	UW Year

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

		Development year												
	Year	0	1	2	3	4	5	6	7	8	9	10 & +	In Current year	Sum of years (cumulative)
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0170	C0180
Prior	R0100											806	806	806
N-9	R0160	495	18,590	13,169	26,780	3,280	2,502	420	44	13	10		10	65,303
N-8	R0170	1,843	18,620	8,488	2,612	11,268	9,107	316	45	13			13	52,312
N-7	R0180	37,265	30,138	19,480	7,197	12,006	167	52	51				51	106,355
N-6	R0190	21,764	44,263	29,748	5,519	532	43	20,260					20,260	122,129
N-5	R0200	7,317	58,315	4,598	45	5,286	2,287						2,287	77,848
N-4	R0210	7,227	10,303	29,993	3,158	257							257	50,939
N-3	R0220	8,467	27,521	134,830	188,293								188,293	359,111
N-2	R0230	6,225	44,167	48,272									48,272	98,664
N-1	R0240	10,510	13,811										13,811	24,321
N	R0250	6,193											6,193	6,193
	Total												R0260	280,254	963,981

Gross undiscounted Best Estimate Claims Provisions
(absolute amount)

		Development year											
	Year	0	1	2	3	4	5	6	7	8	9	10 & +	Year end (discounted
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0360
Prior	R0100											15,231	15,082
N-9	R0160	34,286	49,891	36,531	6,440	7,699	3,127	3,275	1,317	1,432	1,221		1,209
N-8	R0170	44,701	31,215	90,577	100,516	100,929	5,292	5,576	4,988	4,464			4,420
N-7	R0180	106,562	65,873	47,343	33,099	20,615	9,180	9,081	8,918				8,831
N-6	R0190	57,980	46,017	11,353	10,124	9,290	59,313	7,257					7,186
N-5	R0200	52,250	31,146	35,138	33,496	29,610	28,119						27,843
N-4	R0210	35,296	80,393	35,106	35,225	52,426							51,912
N-3	R0220	320,739	317,352	232,887	48,418								47,944
N-2	R0230	143,624	157,676	112,131									111,033
N-1	R0240	71,425	101,522										100,528
N	R0250	124,789											123,567
	Total												R0260	499,556

Annex I
S.23.01.01
Own funds

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation (EU) 2015/35						
Ordinary share capital (gross of own shares)	R0010	500.000	500.000			
Share premium account related to ordinary share capital	R0030					
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040					
Subordinated mutual member accounts	R0050					
Surplus funds	R0070					
Preference shares	R0090					
Share premium account related to preference shares	R0110					
Reconciliation reserve	R0130	36.764	36.764			
Subordinated liabilities	R0140					
An amount equal to the value of net deferred tax assets	R0160	-				-
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180					
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds						
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220					
Deductions						
Deductions for participations in financial and credit institutions	R0230					
Total basic own funds after deductions	R0290	536.764	536.764			-
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300					
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310					
Unpaid and uncalled preference shares callable on demand	R0320					
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330					
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340					
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350					
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360					
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370					
Other ancillary own funds	R0390					
Total ancillary own funds	R0400					
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	536.764	536.764			
Total available own funds to meet the MCR	R0510	536.764	536.764			
Total eligible own funds to meet the SCR	R0540	536.764	536.764			
Total eligible own funds to meet the MCR	R0550	536.764	536.764			
SCR	R0580	294.551				
MCR	R0600	73.638				
Ratio of Eligible own funds to SCR	R0620	182%				
Ratio of Eligible own funds to MCR	R0640	729%				

		C0060
Reconciliation reserve		
Excess of assets over liabilities	R0700	602.172
Own shares (held directly and indirectly)	R0710	500.000
Foreseeable dividends, distributions and charges	R0720	65.408
Other basic own fund items	R0730	-
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	-
Reconciliation reserve	R0760	36.764
Expected profits		
Expected profits included in future premiums (EPIFP) - Life business	R0770	-
Expected profits included in future premiums (EPIFP) - Non- life business	R0780	4.073
Total Expected profits included in future premiums (EPIFP)	R0790	4.073

The expected profit included in future premiums is calculated as the difference between the technical provisions without a risk margin and a calculation of the technical provisions without a risk margin under the assumption that the premiums relating to existing insurance and reinsurance contracts that are expected to be received in the future are not received.

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

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0100
Market risk	R0010	55,610		
Counterparty default risk	R0020	48,306		
Life underwriting risk	R0030			
Health underwriting risk	R0040			
Non-life underwriting risk	R0050	243,383		
Diversification	R0060	- 56,561		
Intangible asset risk	R0070			
Basic Solvency Capital Requirement	R0100	290,738		

Calculation of Solvency Capital Requirement		C0100
Operational risk	R0130	16,446
Loss-absorbing capacity of technical provisions	R0140	
Loss-absorbing capacity of deferred taxes	R0150	- 12,633
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	
Solvency capital requirement excluding capital add-on	R0200	294,551
Capital add-on already set	R0210	
Solvency capital requirement	R0220	294,551
Other information on SCR		
Capital requirement for duration-based equity risk sub-module	R0400	
Total amount of Notional Solvency Capital Requirement for remaining part	R0410	
Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420	
Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios	R0430	
Diversification effects due to RFF nSCR aggregation for article 304	R0440	

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

Linear formula component for non-life insurance and reinsurance obligations

		C0010
MCR_{NL} Result	R0010	43,669

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
		C0020	C0030
Medical expense insurance and proportional reinsurance	R0020		
Income protection insurance and proportional reinsurance	R0030		
Workers' compensation insurance and proportional reinsurance	R0040		
Motor vehicle liability insurance and proportional reinsurance	R0050		
Other motor insurance and proportional reinsurance	R0060		
Marine, aviation and transport insurance and proportional reinsurance	R0070	-	2,699
Fire and other damage to property insurance and proportional reinsurance	R0080	275,131	106,455
General liability insurance and proportional reinsurance	R0090	61,953	11,034
Credit and suretyship insurance and proportional reinsurance	R0100	1,511	4,163
Legal expenses insurance and proportional reinsurance	R0110		
Assistance and proportional reinsurance	R0120		
Miscellaneous financial loss insurance and proportional reinsurance	R0130	4,732	-
Non-proportional health reinsurance	R0140		
Non-proportional casualty reinsurance	R0150		
Non-proportional marine, aviation and transport reinsurance	R0160		
Non-proportional property reinsurance	R0170		

Linear formula component for life insurance and reinsurance obligations

		C0040
MCR_{L} Result	R0200	-

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

Overall MCR calculation

		C0070
Linear MCR	R0300	43,669
SCR	R0310	294,551
MCR cap	R0320	132,548
MCR floor	R0330	73,638
Combined MCR	R0340	73,638
Absolute floor of the MCR	R0350	3,700
		C0070
Minimum Capital Requirement	R0400	73,638