

MOL Reinsurance Co dac

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

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Executive Summary

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

MOL Reinsurance Co dac is a company incorporated in Ireland and authorised by the Central Bank of Ireland to undertake the business of non-life reinsurance.

The principal activity of the company is the acceptance of non-life reinsurance business assumed from insurance business written relating to its parent, MOL Hungarian Oil and Gas Plc., and other group companies.

Business and Performance

The Company has a balance on the technical account for non-life insurance business of \$379k for the financial year ended 31 December 2019 (2018: (\$24k)). The directors consider both the level of business and the year-end financial position to be satisfactory.

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

System of Governance

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

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

Outsourced Activities

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

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

Risk Profile

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

Risk	31/12/2019	31/12/2018
	Capital Charge USD '000	Capital Charge USD '000
Market Risk	11,297	9,526
Counterparty Default Risk	18,520	17,813
Non-Life Underwriting Risk	914	3,824

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

Valuation for Solvency Purposes

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

Capital Management

The objective of own funds management is to maintain, at all times, sufficient own funds to cover the SCR and Minimum Capital Requirement ("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 yearly Own Risk and Solvency Assessment ("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 three-year time horizon used for business planning.

As at 31 December 2019, the Company had eligible own funds to cover the SCR of \$41.3m (2018: \$40.3m) on a Solvency II valuation basis. This compares to an SCR of \$25.0m (2018: \$23.6m) and indicates an SCR cover ratio of 165% (2018: 171%). The MCR cover ratio is 662% (2018: 682%).

A BUSINESS and PERFORMANCE

A.1 Business

- A.1.1 Name and legal form of the undertaking
MOL Reinsurance Co dac (hereinafter “the Company”) is incorporated in the Republic of Ireland and is a private company limited by shares.
- A.1.2 Name of the Supervisory Authority responsible for the financial supervision of the undertaking
The Company is regulated by the Central Bank of Ireland (CBI). The CBI can be contacted at: Central Bank of Ireland, PO BOX 559, New Wapping Street, North Wall Quay, Dublin 1, Ireland.
- A.1.3 External auditor of the undertaking
The independent auditors of the Company are:
Ernst & Young, Chartered Accountants, Ernst & Young Building, Harcourt Centre, Harcourt Street, Dublin 2, Ireland.
- A.1.4 Holders of Qualifying Holdings in the Undertaking
The Company is wholly-owned subsidiary of MOL Hungarian Oil and Gas Plc, a company incorporated in Hungary.
- A.1.5 Legal Structure of the Group
MOL Hungarian Oil and Gas Plc is also the ultimate parent company.
- A.1.6 Material lines of business and geographical areas
The principal activity of the company is the acceptance of non-life reinsurance business assumed from insurance business written relating to its parent, MOL Hungarian Oil and Gas Plc., and other group companies.
- Over 95% of insurance business accepted by the Company relates to countries within the EU.
- A.1.7 Significant Business events during the reporting period
The Company continues to closely monitor the ongoing COVID-19 situation and has taken measures to ensure it can continue with business as usual. The Company continues to assess its overall risk exposure across all classes of business and geographical locations. The Directors’, having assessed the risk to the Company at this time, believe COVID-19 will have a minimal impact, as the Company has no employees; its outsourcing arrangements continue to be unaffected and all assets held by the Company are with highly rated banks and within the Group. The Company’s ultimate parent has also taken all necessary precautions, in order to minimise the impact of the pandemic across the group.

A.2 Underwriting Performance

The premium income written by the Company was derived from the acceptance of non-life reinsurance business assumed from insurance business written relating to its parent, MOL Hungarian Oil and Gas Plc., and other group companies.

The Company has determined that the U.S. Dollar (“USD”) is the functional currency.

The table below shows a summary of the technical (underwriting) account for the year ended 31 December 2019. Over 95% of insurance business accepted by the Company relates to countries within the EU. All business relates to property damage and related risks.

Aggregate UW Performance	31/12/2019	31/12/2018
	USD'000	USD'000
Gross premiums earned	15,967	12,484
Outwards reinsurance premiums	(15,396)	(12,078)
Net premiums earned	571	406
Claims incurred, gross amount	(2,500)	(2,556)
Claims incurred, retrocessionaires' share	2,500	2,556
Operating expenses	(371)	(449)
Allocated investment return	179	67
Net technical result	379	24

The Company reported net technical profit of \$379 for the financial year ended 31 December 2019 (2018: \$24k). The increase in profit year-on-year is primarily driven by a higher return on its investments.

A.3 Investment Performance

A.3.1 Income and expenses arising by asset class

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

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

Asset Class	31/12/2019		31/12/2018	
	Amount USD’000	% of portfolio	Amount USD’000	% of portfolio
Cash at bank and in hand	363	1%	5,118	12%
Deposit with group undertaking	42,058	99%	36,184	88%
Total	42,421	100%	41,302	100%

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

Asset Class	31/12/2019	31/12/2018
	Amount USD’000	Amount USD’000
Deposit with group undertaking	881	759
Total	881	759

A.3.2 Gains and losses recognised directly in equity

No gains and losses have been recognised directly in equity.

A.3.3 Investments in securitisation

There are no investments in securitisation.

A.4 Performance of Other Activities

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

A.5 Any Other Information

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

Board of Directors:

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

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

D. Buciu (Chairman)

G. Farkas

B. McDonagh

Independent Control Functions:

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

Risk Management Function

The role of the Company's risk management function ("RMF") is to identify and evaluate the major risks facing the Company and to facilitate the implementation of the risk management system.

Having considered the nature, scale and complexity of the Company's operations the Board has determined that the role of the RMF may be carried out by a Director of the Board. The roles and responsibilities of the RMF are set out within the risk management policy.

Compliance Function

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

Actuarial Function

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

Internal Audit Function

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

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

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

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

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

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

The Board of Directors of the Company includes employees of MOL Group who are remunerated via their service agreements with MOL Hungarian Oil and Gas Plc.

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

The Company is a non-life reinsurance captive whose principal activity is the acceptance of non-life reinsurance business assumed from insurance business written relating to its parent, MOL Hungarian Oil and Gas Plc., and other group companies.

The Company did not enter into any transactions with key management personnel in MOL Group during the year ended 31 December 2019.

The Company has a deposit in place with MOL Group Finance S.A., Bertrange, Zürich Branch, the balance of which as at 31 December 2019 was \$42.2m (2018: \$36.2m).

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 Central Bank of Ireland (“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 CFs or PCFs should, at a minimum, comply.

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

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

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

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

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

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

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

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

B.3.1 Risk management system

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

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

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

The Company performs an Own Risk and Solvency Assessment ("ORSA") at least annually. The main purpose of performing the ORSA is to ensure that the Company engages in a process of assessing all risks inherent in the business and determining the corresponding capital needs. In order to ensure effective risk governance, the system has been designed to identify, assess, manage and monitor and report exposure to risk. This is a continuous process subject to continuous review and development.

Identify

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

Assess

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

Manage

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

Monitor/Report

Monitoring and reporting to the Board is undertaken at least quarterly from a number of sources including the Risk Management Function, Compliance Officer and the Internal Audit Function. Findings from the development of the risk register are considered by the Board in the preparation of the annual internal audit plans.

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

B.3.2 Implementation of the Risk management system

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

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

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

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

1st Line of Defence – Day-to-Day:

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

2nd Line of Defence – Oversight:

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

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

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

3rd Line of Defence – Independent Assessment:

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

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

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

Actuarial Function: The role of the Actuarial Function is outsourced to a third party provider, KPMG, via the terms of a written service level agreement.

B.3.3 ORSA

B.3.3.1 ORSA process

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

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

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



Risk Management System: The Board puts in place an effective risk management framework comprising of strategies, tolerances, policies, governance, monitoring and reporting procedures necessary to identify, measure, monitor, manage and report, on a continuous basis, the risks to which the Company is or could be exposed in pursuing its 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, risk profile (quantitative and qualitative), calculation and analysis of regulatory and economic capital, analysis of solvency margin cover and description and assessment of risk mitigation techniques.

Stress and Scenario Analysis: 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.

B.3.3.2 ORSA review and approval process

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

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

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

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

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

- Significant change in the risk profile of the Company which can be defined as a major change to the business strategy or business activities
- Significant changes to non-financial matters - operational/regulatory risks and legal/strategic/group risks
- Significant changes in other categories - e.g. risks relating to capital shortage or a change in the quality of capital etc.

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

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

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

The Company has sufficient capital to meet its base case SCR for its current and projected business activities over the 4-year business planning horizon. The Company is also projected to exceed its strategic minimum SCR coverage over the period.

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

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

B.4 Internal Control System

B.4.1 Description of the internal control system

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

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

- First line of defence: “day-to-day” operations and associated controls.
- Second line of defence: oversight from compliance and risk management functions
- Third line of defence: independent assessment, internal audit and actuarial functions (plus external audit).

B.4.2 Implementation of the compliance function

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

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

The role of the Board-appointed Compliance Officer is to:

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

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

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

B.5 Internal audit function

B.5.1 Implementation of the internal audit function

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

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

- establish, implement and maintain an audit plan setting out the audit work to be undertaken in the upcoming years, taking into account all activities and the complete system of governance of the Company;
- take a risk-based approach in deciding its priorities;
- report the audit plan to Board of Directors; and

- issue recommendations based on the result of work carried out in accordance with the audit plan, and submit a written report on its findings and recommendations to the Board of Directors on at least an annual basis.

B.5.2 Independence of the internal audit function

The internal audit function provides independent and objective assurance services to the Company.

B.6 Actuarial function

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

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

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

B.7 Outsourcing

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

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

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

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

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

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

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

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

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

C RISK PROFILE

C.1 Underwriting risk

C.1.1 Key underwriting risks

Non-life underwriting risk at 31 December 2019 comprises 3% (2018: 13%) 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 reinsurer, underwriting risk is the risk arising from non-life reinsurance 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 reinsurance underwriting.

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 limitations regarding the Company's underwriting activities.

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

For reserve risk, the Company has considered the risk of over- and under-reserving of actual and expected claims.

Non-life catastrophe risk

The risk of a major natural or man-made catastrophe event occurring is considered as part of the Company's underwriting risk. The capital requirements of the non-life catastrophe underwriting risk module are calculated in line with the Solvency II standard formula. Risk mitigation in respect of catastrophe risks is provided by reinsurance arrangements in place.

C.1.2 Material risk concentrations

The Company seeks to avoid concentration of risks by accepting reinsurance of risks which are sourced across a number of different countries in the EU and Asia.

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;
- Assessing reinsurance risks with quality underwriting and claims expertise and information;
- Retaining risk within an approved risk appetite and solvency requirements;
- Transferring risk through retrocession with high credit quality entities;
- Monitoring changing environment and market conditions that affect risk;
- The ORSA includes stress and scenario testing which is used to assess the risks under stressed conditions;
- Independent opinion on the reasonableness and adequacy of the overall underwriting policy is provided by the Head of Actuarial Function on an annual basis.

C.2 Market risk

C.2.1 Material market risks

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

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

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

Market Risk sub-module	31/12/2019	31/12/2018
	USD'000	USD'000
Concentration	11,244	9,682
Spread	1,057	910
Interest rate	239	315

Concentration risk: the risk that excessive exposure to a counterparty will impact on the solvency of the Company. Concentration risk of \$11.2m is the most significant market risk charge and arises in respect of the deposit with a group undertaking.

Spread risk: the sensitivity of the value of the deposit with a group undertaking to changes in the level or the volatility of credit spreads. Spread risk is linked to the credit rating of assets held and the effect of a market change in the credit curve.

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

C.2.2 Material Risk Concentrations

There is a material risk concentration in respect of the deposit with a group undertaking. The concentration risk charge ensures that an adequate level of capital is maintained to compensate for this risk.

C.2.3 Prudent person principle applied to market risks

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

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

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

- Compliance with the Investment and Asset Liability Policy as approved by the Company's Board of Directors;
- Retaining risk within an approved risk appetite and solvency requirements;
- Monitoring changing environment and market conditions that affect risk;
- 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 60% (2018: 55%) 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 settle its financial obligations towards the Company.

The material credit risks as at 31 December 2019 relate to the cash balances with financial institutions and the reinsurance arrangements with a panel of reinsurers.

C.3.2 Material Risk Concentrations

The company's placement of retrocession is diversified in such a way that it is neither dependent on a single retrocessionaire nor are the operations of the company dependent on any single retrocession contract.

C.3.2 Prudent person principle applied to credit risks

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

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

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

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

C.4 Liquidity risk

C.4.1 Material liquidity risks

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

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

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

The Company's cash inflow is generated from premium income and claims recoveries. Its cash outflow consists mainly of claims payments and a small volume of administration expenses.

C.4.2 Prudent person principle applied to liquidity risks

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

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

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

- Compliance with the Liquidity and Concentration Policy as approved by the Company's Board of Directors;
- Retaining risk within an approved risk appetite and solvency requirements;
- The Manager monitors cash movements and performs cash flow forecasting which are regularly reported to the Company;
- Premiums are billed on an annual basis. Upon receipt of premium, investments are made in line with the Company's Investment and Asset Liability Policy;
- Reporting of cash, investment and liquidity positions takes place monthly as part of the Company's management accounts reporting process.

C.5 Operational risk

C.5.1 Material operational risks

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

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

For such non-quantifiable risks, the Company has set a strategic surplus (target) of 20% as a prudent buffer to the Standard Formula calculation.

Operational risks are also addressed in the capital requirement as an addition to the Basic SCR 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 \$509k (2018: \$375k).

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

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

- Identifying and analysing risk through a disciplined risk assessment process;
- Mitigating or avoiding risks that do not fit within the Company's business objectives;
- Implementing a robust system of internal controls and procedures;
- Segregation of duties;
- Monitoring and internal reporting;
- Outsourcing its management to an experienced management company;
- Setting a strategic surplus target of 15% above the SCR;
- Commitment of effective corporate governance.

C.6 Other material risks

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

Sample risks include:

- Regulatory and compliance risks;
- Loss of key personnel / director resignation;
- Outsourcing risks.

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

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

The Board recognises that the Company operates on a basis of an outsourced model, whereby the day to day operations and a number of key functions are outsourced; the Board is satisfied that all outsourcing agreements include an appropriate notice period. This would provide the Company with sufficient time to find an alternative professional services provider if required. Additionally, performance of outsourced providers is reviewed on an annual basis and such review would flag any potential deficiencies of the individual service provider.

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

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

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 \$135k (2018: \$177k).

C.8 Stress and sensitivity tests

The Company's ORSA is undertaken using stress test scenarios, which are based on the largest risks per the Company's risk register, and reverse stress tests where appropriate.

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.

C.9 Any Other Information

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

D VALUATION for SOLVENCY PURPOSES

D.1 Assets

D.1.1-2 Local GAAP and Solvency II Valuations

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

	31/12/2019		31/12/2018	
	Assets per GAAP	Assets per Solvency II	Assets per GAAP	Assets per Solvency II
	Total USD'000	Total USD'000	Total USD'000	Total USD'000
Cash at bank	363	363	5,118	5,118
Deposit with group undertaking	42,278	42,278	36,406	36,406
Insurance receivables	88	88	85	85
Total assets	44,729	44,729	41,609	41,609

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

Cash at bank

Cash at bank is valued at market value as at 31 December 2019.

Deposit with group undertaking

Deposits with group undertakings are stated at cost less provision for impairment, if any.

Insurance receivables

Insurance receivables are stated at net book value less provision for impairment, if any.

D.2 Technical Provisions

D.2.1 Local GAAP and Solvency II Valuations

Insurance business is mapped to Solvency II line of business on the following basis:

Class of Business as per Local GAAP	Solvency II Class of Business
Property Damage (onshore risks)	Fire and Other Damage to Property
Property Damage (offshore risks)	Marine, Aviation and Transport

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

Solvency II Line of Business	31/12/2019		31/12/2018	
	TPs per GAAP	TPs per Solvency II	TPs per GAAP	TPs per Solvency II
	USD'000	USD'000	USD'000	USD'000
Fire and other damage to property				
Best estimate of liabilities (BEL)	-	(87)	-	11
Risk margin	-	963	-	623
Marine, aviation and transport				
Best estimate of liabilities (BEL)	-	23	-	(6)
Risk margin	-	188	-	470
Total technical provisions	-	1,087	-	1,163

The GAAP accounts of the Company include a provision for claims incurred of \$2.5m on a gross basis (2018: \$5m), nil on a net basis as at 31 December 2019 (2018: Nil).

There are no premium provisions (relating to gross premiums written that have not expired by the end of the financial period by reference to the full term of the insurance policies to which such premiums relate) as all premiums were fully earned as at 31 December 2019.

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

The Claims Provision is calculated as the discounted best estimate of all future cash flows relating to claims events prior to the valuation date. Cash flows have been discounted using the relevant risk-free yield curves as at 31 December 2019 as published by the European Insurance and Occupational Pensions Authority ("EIOPA").

The Company's renewals which incept on 1 January 2020 are bound as at 31 December 2019. Future premium, commission and claims cash flows in respect of written but not yet incepted business are based on the business planning forecasts of the Company and are consistent with budgeted volume for 2020 and best estimate loss ratios.

Risk margin

The risk margin was calculated using Simplification Method 2 from Guideline 61 of the Solvency II "Guidelines on the Valuation of Technical Provisions". This methodology approximates the discounted sum of all future SCRs, with the annual cost of capital assumed to be 6% of the capital estimated at each future point.

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 Claims Provision are driven by the uncertainty of the underlying booked reserves and the appropriateness of historic data, and in particular incurred claims, to project claims to ultimate. Uncertainty is also inherent in the Premium Provision and in the judgement applied when selecting loss ratio assumptions which are based on historic data.

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

The GAAP accounts include a recoverable of \$2.5m from reinsurance at 31 December 2019 (2018: \$5m).

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

There are no material changes in the relevant assumptions made in the calculation of the technical provisions compared to the previous reporting period ("Day 1" Solvency II reporting).

D.3 Other liabilities

Other liabilities as at 31 December 2019 were \$341k (2018: \$171k) and are composed of reinsurance balances payable, corporation tax payable and accrued expenses.

There were no differences between the Local GAAP and Solvency II valuations.

D.4 Alternative methods for valuation of other liabilities

The Company does not use any alternative methods for valuation.

D.5 Any Other Information

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

E CAPITAL MANAGEMENT

E.1 Own funds

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

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

- Own funds to be maintained at an agreed level in excess of the SCR, target solvency margin cover is currently set at 115% of the SCR;
- Dividends will not be paid or will be deferred if doing so would cause the Company to breach its legal and regulatory requirements or fall below the abovementioned target SCR cover;
- The Company's own funds are primarily invested in cash at bank and a deposit with a group undertaking in line with the Board approved Investment and Asset Liability Policy.

E.1.2 Own funds analysed by tiers

An analysis of own funds is shown below:

Date	Description	Tier 1 USD'000	Total USD'000
1 January 2019	Opening balance comprising: Ordinary share capital Other basic own funds Reconciliation reserve	950 38,550 1,698	950 38,550 1,698
	Movement in the reconciliation reserve for the year ended 31 December 2019	103	103
31 December 2019	Closing balance	41,301	41,301
	Represented by:		
	Ordinary share capital	950	950
	Other basic own funds	38,550	38,550
	Reconciliation reserve (comprising retained earnings and Solvency II adjustments)	1,801	1,801
	Total basic own funds after deductions	41,301	41,301

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

The Company has no tier 1 restricted own funds and no tier 2 or tier 3 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 \$41.3m (2018: \$40.3m). This is comprised of Tier 1 unrestricted Basic Own Funds of \$41.3m (2018: \$40.3m).

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

The eligible amount of own funds to cover the Minimum Capital Requirement is \$41.3m (2018: \$40.3m). This is comprised of Tier 1 unrestricted Basic Own Funds of \$41.3m (2018: \$40.3m).

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

Reconciliation of Basic Own Funds to Equity as per financial statements as at 31 December 2019	
	USD'000
Solvency II - Basic Own Funds	41,301
Total Equity as per financial statements	42,388
Difference:	(1,087)
<u>Represented by:</u>	
Difference between Net Technical Provisions and Solvency II Best Estimate of Liabilities (BEL)	63
Solvency II risk margin – non-life	(1,150)
Difference:	(1,087)

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 ancillary own funds items.

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:

	31/12/2019	31/12/2018
	USD'000	USD'000
SCR	24,966	23,607
MCR	6,242	5,902

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

E.2.2 Solvency Capital Requirement split by risk modules

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

SCR Overview	31/12/2019	31/12/2018
	USD'000	USD'000
Market risk	11,297	9,731
Counterparty default risk	18,520	16,410
Non-life underwriting risk	914	3,822
Diversification	(6,274)	(6,731)
Basic Solvency Capital Requirement	24,457	23,232
Operational risk	509	375
Solvency Capital Requirement	24,966	23,607

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 MCR calculation as at 31 December 2019.

MCR Overview	31/12/2019	31/12/2018
	USD'000	USD'000
Linear MCR	57	45
SCR	24,966	23,607
MCR cap	11,235	10,623
MCR floor	6,242	5,902
Combined MCR	6,242	5,902
Absolute floor of the MCR	1,348	1,374
Minimum Capital Requirement	6,242	5,902

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

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

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

E.4 Internal model information

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

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

There were no breaches of the Solvency Capital Requirement or the Minimum Capital Requirement over the reporting period.

E.6 Any other information

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

Annex I**S.02.01.02****Balance sheet****Assets**

Goodwill

Deferred acquisition costs

Intangible assets

Deferred tax assets

Pension benefit surplus

Property, plant & equipment held for own use

Investments (other than assets held for index-linked and unit-linked contracts)

Property (other than for own use)

Holdings in related undertakings, including participations

Equities

Equities - listed

Equities - unlisted

Bonds

Government Bonds

Corporate Bonds

Structured notes

Collateralised securities

Collective Investments Undertakings

Derivatives

Deposits other than cash equivalents

Other investments

Assets held for index-linked and unit-linked contracts

Loans and mortgages

Loans on policies

Loans and mortgages to individuals

Other loans and mortgages

Reinsurance recoverables from:

Non-life and health similar to non-life

Non-life excluding health

Health similar to non-life

Life and health similar to life, excluding health and index-linked and unit-linked

Health similar to life

Life excluding health and index-linked and unit-linked

Life index-linked and unit-linked

Deposits to cedants

Insurance and intermediaries receivables

Reinsurance receivables

Receivables (trade, not insurance)

Own shares (held directly)

Amounts due in respect of own fund items or initial fund called up but not yet paid in

Cash and cash equivalents

Any other assets, not elsewhere shown

Total assets

	Solvency II value
	C0010
R0010	
R0020	
R0030	
R0040	
R0050	
R0060	
R0070	42,278
R0080	
R0090	
R0100	
R0110	
R0120	
R0130	42,278
R0140	
R0150	42,278
R0160	
R0170	
R0180	
R0190	
R0200	
R0210	
R0220	
R0230	
R0240	
R0250	
R0260	
R0270	(9,618)
R0280	(9,618)
R0290	(9,618)
R0300	
R0310	
R0320	
R0330	
R0340	
R0350	
R0360	88
R0370	
R0380	
R0390	
R0400	
R0410	363
R0420	-
R0500	33,111

Annex I**S.02.01.02****Balance sheet****Liabilities**

Technical provisions – non-life

Technical provisions – non-life (excluding health)

Technical provisions calculated as a whole

Best Estimate

Risk margin

Technical provisions - health (similar to non-life)

Technical provisions calculated as a whole

Best Estimate

Risk margin

Technical provisions - life (excluding index-linked and unit-linked)

Technical provisions - health (similar to life)

Technical provisions calculated as a whole

Best Estimate

Risk margin

Technical provisions – life (excluding health and index-linked and unit-linked)

Technical provisions calculated as a whole

Best Estimate

Risk margin

Technical provisions – index-linked and unit-linked

Technical provisions calculated as a whole

Best Estimate

Risk margin

Other technical provisions

Contingent liabilities

Provisions other than technical provisions

Pension benefit obligations

Deposits from reinsurers

Deferred tax liabilities

Derivatives

Debts owed to credit institutions

Financial liabilities other than debts owed to credit institutions

Insurance & intermediaries payables

Reinsurance payables

Payables (trade, not insurance)

Subordinated liabilities

Subordinated liabilities not in Basic Own Funds

Subordinated liabilities in Basic Own Funds

Any other liabilities, not elsewhere shown

Total liabilities**Excess of assets over liabilities**

	Solvency II value
	C0010
R0510	(8,531)
R0520	(8,531)
R0530	
R0540	(9,681)
R0550	1,150
R0560	
R0570	
R0580	
R0590	
R0600	
R0610	
R0620	
R0630	
R0640	
R0650	
R0660	
R0670	
R0680	
R0690	
R0700	
R0710	
R0720	
R0730	
R0740	
R0750	
R0760	
R0770	
R0780	
R0790	
R0800	
R0810	
R0820	
R0830	144
R0840	147
R0850	
R0860	
R0870	
R0880	50
R0900	(8,190)
R1000	41,301

S.05.01.02

[illegible]

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

		Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)			Line of business for: accepted non-proportional reinsurance				Total
		Legal expenses insurance	Assistance	Miscellaneous financial loss	Health	Casualty	Marine, aviation, transport	Property	
		C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0200
Premiums written									
Gross - Direct Business	R0110								-
Gross - Proportional reinsurance accepted	R0120								15,967
Gross - Non-proportional reinsurance accepted	R0130								-
Reinsurers' share	R0140								15,396
Net	R0200								571
Premiums earned									-
Gross - Direct Business	R0210								-
Gross - Proportional reinsurance accepted	R0220								15,967
Gross - Non-proportional reinsurance accepted	R0230								-
Reinsurers' share	R0240								15,396
Net	R0300								571
Claims incurred									-
Gross - Direct Business	R0310								-
Gross - Proportional reinsurance accepted	R0320								2,500
Gross - Non-proportional reinsurance accepted	R0330								-
Reinsurers' share	R0340								2,500
Net	R0400								-
Changes in other technical provisions									-
Gross - Direct Business	R0410								-
Gross - Proportional reinsurance accepted	R0420								-
Gross - Non- proportional reinsurance accepted	R0430								-
Reinsurers'share	R0440								-
Net	R0500								-
Expenses incurred	R0550								371
Other expenses	R1200								-
Total expenses	R1300								371

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	CROATIA	HUNGARY	SLOVAKIA	UK	
Premiums written	Gross - Direct Business	R0110	-	-	-	-	-	-
	Gross - Proportional reinsurance accepted	R0120	-	4,054	6,995	2,750	1,415	15,214
	Gross - Non-proportional reinsurance accepted	R0130						
	Reinsurers' share	R0140	-	3,892	6,725	2,677	1,350	14,644
	Net	R0200	-	162	270	73	65	570
Premiums earned	Gross - Direct Business	R0210	-	-	-	-	-	-
	Gross - Proportional reinsurance accepted	R0220	-	4,054	6,995	2,750	1,415	15,214
	Gross - Non-proportional reinsurance accepted	R0230						
	Reinsurers' share	R0240	-	3,892	6,725	2,677	1,350	14,644
	Net	R0300	-	162	270	73	65	570
Claims incurred	Gross - Direct Business	R0310	-	-	-	-	-	-
	Gross - Proportional reinsurance accepted	R0320	-	-	-	2,500	-	2,500
	Gross - Non-proportional reinsurance accepted	R0330						
	Reinsurers' share	R0340	-	-	-	2,500	-	2,500
	Net	R0400	-	-	-	-	-	-
Changes in other technical provisions	Gross - Direct Business	R0410	-	-	-	-	-	-
	Gross - Proportional reinsurance accepted	R0420	-	-	-	-	-	-
	Gross - Non-proportional reinsurance accepted	R0430						
	Reinsurers' share	R0440	-	-	-	-	-	-
	Net	R0500	-	-	-	-	-	-
Expenses incurred		R0550	210	41	71	28	15	365
Other expenses		R1200						-
Total expenses		R1300						365

Non-life Technical Provisions

Technical provisions calculated as a whole

Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole

Technical provisions calculated as a sum of BE and RM

Best estimate

Premium provisions

Gross

Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default

Net Best Estimate of Premium Provisions

Claims provisions

Gross

Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default

Net Best Estimate of Claims Provisions

Total Best estimate - gross

Total Best estimate - net

Risk margin

Amount of the transitional on Technical Provisions

Technical Provisions calculated as a whole

Best estimate

Risk margin

Technical provisions - total

Technical provisions - total

Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total

Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total

Annex I
S.19.01.21
Non-life Insurance Claims Information

Total Non-Life Business

Accident year / Underwriting year	Z0010	UWY
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Gross Claims Paid (non-cumulative) (absolute amount)												In Current year		Sum of years (cumulative)
Year		0	1	2	3	4	5	6	7	8	9	10 & +	C0170	C0180
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110		
Prior	R0100											-	R0100	-
N-9	R0160	-	-	-	-	-	-	-	-	-	-		R0160	-
N-8	R0170	-	-	-	-	-	-	-	-	-			R0170	-
N-7	R0180	-	-	-	-	-	-	-	-				R0180	-
N-6	R0190	-	-	-	-	-	-	-					R0190	-
N-5	R0200	-	-	-	-	-	-						R0200	-
N-4	R0210	3,263.00	1,740.00	-	-	-							R0210	5,003
N-3	R0220	8,000	-	-	-								R0220	8,000
N-2	R0230	-	1,056	-									R0230	1,056
N-1	R0240	-	-										R0240	-
N	R0250	-											R0250	-
Total													R0260	14,059

Gross undiscounted Best Estimate Claims Provisions (absolute amount)														
		Development year										Year end (discounted data)		
Year		0	1	2	3	4	5	6	7	8	9	10 & +	C0360	
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300		
Prior	R0100											-	R0100	-
N-9	R0160	-	-	-	-	-	-	-	-	-	-		R0160	-
N-8	R0170	-	-	-	-	-	-	-	-	-			R0170	-
N-7	R0180	-	-	-	-	-	-	-	-				R0180	-
N-6	R0190	-	-	-	-	-	-	-					R0190	-
N-5	R0200	-	-	-	-	-	-						R0200	-
N-4	R0210	1,740	-	-	-	-							R0210	-
N-3	R0220	-	-	-	-								R0220	-
N-2	R0230	3,500	-	-									R0230	-
N-1	R0240	5,000	-										R0240	-
N	R0250	2,500											R0250	2,480
Total												R0260	2,480	

Annex I
S.23.01.01
Own funds

Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35

Ordinary share capital (gross of own shares)	R0010
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
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
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Deductions

Deductions for participations in financial and credit institutions	R0230
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Total basic own funds after deductions

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
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Other ancillary own funds	R0390
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Total ancillary own funds

Available and eligible own funds

Total available own funds to meet the SCR	R0500
Total available own funds to meet the MCR	R0510
Total eligible own funds to meet the SCR	R0540
Total eligible own funds to meet the MCR	R0550

SCR

MCR

Ratio of Eligible own funds to SCR

Ratio of Eligible own funds to MCR

Reconciliation reserve

Excess of assets over liabilities	R0700
Own shares (held directly and indirectly)	R0710
Foreseable dividends, distributions and charges	R0720
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

Expected profits

Expected profits included in future premiums (EPIFP) - Life business	R0770
Expected profits included in future premiums (EPIFP) - Non- life business	R0780

Total Expected profits included in future premiums (EPIFP)

Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
C0010	C0020	C0030	C0040	C0050
950	950	-	-	-
-	-	-	-	-
-	-	-	-	-
-	-	-	-	-
-	-	-	-	-
-	-	-	-	-
-	-	-	-	-
1,801	1,801	-	-	-
-	-	-	-	-
-	-	-	-	-
38,550	38,550	-	-	-
-	-	-	-	-
-	-	-	-	-
41,301	41,301	-	-	-
-	-	-	-	-
-	-	-	-	-
-	-	-	-	-
-	-	-	-	-
-	-	-	-	-
-	-	-	-	-
-	-	-	-	-
-	-	-	-	-
-	-	-	-	-
-	-	-	-	-
-	-	-	-	-
-	-	-	-	-
41,301	41,301	-	-	-
41,301	41,301	-	-	-
41,301	41,301	-	-	-
41,301	41,301	-	-	-
24,966	-	-	-	-
6,242	-	-	-	-
165%	-	-	-	-
662%	-	-	-	-

C0060	
41,301	
-	
-	
39,500	
-	
1,801	
-	
135	
135	

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

Market risk

Counterparty default risk

Life underwriting risk

Health underwriting risk

Non-life underwriting risk

Diversification

Intangible asset risk

Basic Solvency Capital Requirement**Calculation of Solvency Capital Requirement**

Operational risk

Loss-absorbing capacity of technical provisions

Loss-absorbing capacity of deferred taxes

Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC

Solvency capital requirement excluding capital add-on

Capital add-on already set

Solvency capital requirement**Other information on SCR**

Capital requirement for duration-based equity risk sub-module

Total amount of Notional Solvency Capital Requirement for remaining part

Total amount of Notional Solvency Capital Requirements for ring fenced funds

Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios

Diversification effects due to RFF nSCR aggregation for article 304

	Gross solvency capital requirement	USP	Simplifications
	C0110	C0090	C0100
R0010	11,297		
R0020	18,520		
R0030	-	-	-
R0040	-	-	-
R0050	914	-	-
R0060	(6,274)		
R0070	-		
R0100	24,457		

	C0100
R0130	509
R0140	-
R0150	-
R0160	-
R0200	24,966
R0210	-
R0220	24,966
R0400	-
R0410	-
R0420	-
R0430	-
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

MCR _{NL} Result	C0010	
	R0010	57

	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	23
Fire and other damage to property insurance and proportional reinsurance	R0080	182
General liability insurance and proportional reinsurance	R0090	389
Credit and suretyship insurance and proportional reinsurance	R0100	-
Legal expenses insurance and proportional reinsurance	R0110	-
Assistance and proportional reinsurance	R0120	-
Miscellaneous financial loss insurance and proportional reinsurance	R0130	-
Non-proportional health reinsurance	R0140	-
Non-proportional casualty reinsurance	R0150	-
Non-proportional marine, aviation and transport reinsurance	R0160	-
Non-proportional property reinsurance	R0170	-

Linear formula component for life insurance and reinsurance obligations

MCR _L Result	C0040	
	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	
	R0300	57
Linear MCR	R0310	24,966
SCR	R0320	11,235
MCR cap	R0330	6,242
MCR floor	R0340	6,242
Combined MCR	R0350	1,348
Absolute floor of the MCR		
Minimum Capital Requirement	C0070	
	R0400	6,242