



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

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Executive Summary

The harmonized EU-wide regulatory regime for Insurance Companies, known as Solvency II, came into force on 1st January 2016. The regime required new reporting and public disclosure arrangements to be put in place by (re)insurers. This document is the fourth annual Solvency and Financial Condition Report ("SFCR") prepared by NEIL Overseas dac ("the Company")

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

Company Background

NEIL Overseas 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:

- Class 7: Goods in Transit;
- Class 8: Fire and Natural Forces;
- Class 9: Other Damage to Property;
- Class 13: General Liability;
- Class 16: Miscellaneous Financial Loss.

The Company is a wholly owned subsidiary of Nuclear Electric Insurance Limited, a company incorporated in Bermuda and also the ultimate parent company.

The Company was granted authorisation to carry on insurance business by the Minister for Enterprise and Employment, with effect from 8 December 1998.

The Company's principal activity during the financial year was insurance underwriting for nuclear power stations in the European Union. The Company underwrites policies for both property and business interruption coverage.

Business and Performance

The Company had a result on its technical account non-life insurance business of US\$8,523,000 profit (2018 profit: US\$ 8,759,000).

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 ("The Code"). The corporate governance principles of the Company are implemented via the following Corporate Governance Framework:

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

The Board of Directors, critical functions and the audit and risk committees in place at 31 December are as follows:

Name	Status on Board	Membership and Status on Board and Sub-Committees	PCF
B.Sassi	NED/Chair	Chairperson of BOD, Member of Risk Committee	PCF-2 & PCF-3
S. Woods	ED	Member of BOD, Risk Committee	PCF-1, 8,11,18 & 43
I. Britchfield	INED	Member of All, Chairperson of the Risk Committee	PCF-2 & PCF-5
M. Kolodner*	NED	Member of All	PCF-2
A. Arena	NED	Member of BOD, Risk Committee	PCF-2
R. Frewen	INED	Member of All	PCF-2
R. Sullivan	INED	Member of All, Chairperson of the Audit Committee	PCF-2 7 PCF-4

* Resigned 2nd Jan 2020

The Company adopts three lines of defence in managing its risks which are outlined from page 21 of this report.

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:

Service Outsourced	Jurisdiction
Internal Audit (concurrent with NEIL)	USA
Head of Internal Audit Function	USA
Head of Actuarial Function	EU
Head of Risk Management Function	USA
Solvency II QRT preparation and SCR calculations	EU
Investment Managers (concurrent with NEIL)	EU
Support with key activities including Underwriting and Claims support.	USA

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	Capital Charge
	US\$ '000
Market Risk	8,686
Counterparty Default Risk	51,952
Non-Life Underwriting Risk	12,728

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

Valuation for Solvency Purposes

The Company's assets and liabilities, under Solvency II methodology, are valued on a fair value basis. This differs in some respects from the GAAP valuations for 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 technical provisions, which represents the cost of holding the solvency capital requirement. Section D of this report 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 five 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 share capital over the five-year time horizon used for business planning.

The Company has also received \$72million in capital contributions since its inception. These contributions are irrevocable, non-refundable and will not result in a grant by the Company of any rights or the assumption by the Company and of any obligations to the parent or any third party. These capital contributions have been approved by the CBI as Tier 1 Own Funds as per the Solvency II Directive.

At the end of 2019, the Company had a surplus of assets over liabilities of US\$91.55m on a Solvency II valuation basis. This compares to a SCR requirement of US\$63.168m and indicates a solvency cover ratio of 145%. The MCR coverage ratio is 576%.

Covid-19 Pandemic

The Covid-19 Pandemic has resulted in the Company putting its Pandemic Plan into effect, which has resulted in remote working for staff.

Currently the Company anticipates no direct impact on policy renewals and claims.

The impact on investments is being closely monitored and at the time of signing the Company estimates capital levels continue to be above the solvency buffer.

A. BUSINESS AND PERFORMANCE

A.1 Business and Performance

A.1.1 Name and legal form of the undertaking

NEIL Overseas 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:

Deloitte Ireland LLP, Chartered Accountants and Statutory Audit Firm, Deloitte & Touche House, Earlsfort Terrace, Dublin 2, Ireland.

A.1.4 Holders of Qualifying Holdings in the Undertaking

The Company is wholly owned by Nuclear Electric Insurance Limited, a company incorporated in Bermuda.

A.1.5 Legal Structure of the Group

Nuclear Electric Insurance Limited is also the ultimate parent company.

A.1.6 Material Lines of Business and Geographical Areas

The Company's principal activity is underwriting for nuclear power plants in the European Union. Policies are available for both property and business interruption (accidental outage) coverage.

The material geographical areas are member states of the European Union and for the purposes of capital reporting these are categorised as Region 2 (Western Europe) and Region 4 (South Europe).

A.1.7 Significant Business Events During the Reporting Period

No material events occurred during the year that would merit disclosure.

A.2 Underwriting Performance

The premium income written by the Company was principally derived from the coverage of all the nuclear power plants in both Belgium and Spain. In Belgium, the plants are owned by Electrabel, the Belgian utility. In Spain, the plants are owned by the Spanish utilities of Endesa, Iberdrola, Naturgy, Nuclenor and EDP España.

The insurance of nuclear power plants is a specialised undertaking with a risk profile of losses being of low frequency but high severity. The Company insures nuclear plants and their generating units for: 1) the costs associated with certain long-term interruptions of electric generation due to accidental physical damage to insured sites; 2) decontamination

expenses incurred at such sites arising from nuclear contamination; and 3) other risks of direct physical loss at such sites, including certain premature decommissioning costs under the Company's programs. The claims arising in 2019 are typical of the nature of the risk as described above which occur in the normal course of business.

Additional premium income written by the Company is derived from coverage provided in support of the conventional insurance programs of Insureds of the Company who are Members of Nuclear Electric Insurance Limited (NEIL). This coverage is provided primarily on a quota share basis, in conformity with the conventional property programs, following the terms and condition underwritten by the insured's lead underwriter. This business is written directly or as assumed reinsurance.

Additional premium is also earned through participation on non-Member programs, which typically support the Nuclear Industry.

The Company has entered into an excess of loss reinsurance agreement with its parent, NEIL. The Company has an annual aggregate retention of US\$10M with losses above this being ceded to NEIL. Within this agreement, the Company is also a Named Insured on excess of loss treaties that NEIL has executed with commercial markets.

The Company currently writes the following lines of business: Property Damage and Business Interruption (Accidental Outage) risks (Classes 8 & 9), for the purposes of capital reporting this is categorised as Fire and Other Damage to Property insurance. The Company has written Architects' and Engineers' Professional Liability (Class 13), for the purposes of capital reporting this is categorised as General Liability insurance.

The Company has determined that the US\$ is the functional currency.

The Company had a result on its technical account non-life insurance business of US\$8,523,000 profit (2018 profit: US\$ 8,759,000).

The table below shows a summary of the technical (underwriting) account for the year ended 31 December 2019 (based on Irish GAAP):

Fire and Other Damage to Property & General Liability	31/12/2019	31/12/2018
	US\$'000	US\$'000
Gross premiums – Fire Damage & Other Property	29,727	29,861
Gross premiums – General Liability	NIL	978
Reinsurers' share of premiums	(20,046)	(20,980)
Net claims incurred	(103)	(206)
Net operating expenses	(1,822)	(1,750)
Investment income	767	856
Balance on the technical account	8,523	8,759

The slight decrease in the balance on the technical account from 2018 to 2019 is due to a decrease in premium and investment income, partly offset by a reduction in claims incurred.

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 asset classes (based on Irish GAAP):

Asset Class	31/12/2019		31/12/2018	
	Amount US\$'000	% of portfolio	Amount US\$'000	% of portfolio
Fixed Income Securities	112,769	98%	94,145	93%
Cash Deposits	2,066	2%	6,608	7%
Total	114,835	100%	100,753	100%

The table below sets out the investment returns by asset class (based on Irish GAAP):

Debt securities and other fixed income securities	31/12/2019	31/12/2018
	Total US\$'000	Total US\$'000
Net investment income	3,400	2,854
Net realised gain/(loss)	588	(620)
Investment management expense	(165)	(197)
Change in unrealised FX fair value	16	165
Changes in fair value	3,328	(1,104)
Net investment result	7,167	1,098

The Company had income and gains from investment activity of US\$7,167,000 (2018 gain: US\$1,098,000). The full year return of the portfolio was +6.9% (2018: 0.9%), an underperformance of the benchmark by 9 bps (net of fees).

A.3.2 Gains and Losses Recognised Directly in Equity

No gains and losses have been recognised directly in equity.

A.3.3 Investment 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 September 2023.

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 Roles and responsibilities of the administrative, management or supervisory body and key functions.

The Company is classified as a Medium/Low Impact 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. Prior to the 24th January 2019 it was classified as a Low Impact firm. The company has a requirement to comply with the provisions of the Central Bank of Ireland's Corporate Governance Requirements for Insurance Undertakings ("The Code").

Board of Directors:

The composition of the Board of Directors at 31st December was as follows:

Name	Status on Board	Membership and Status on Board and Sub-Committees	PCF
B.Sassi	NED/Chairperson	Chairperson of BOD, Member of the Risk Committee	PCF-2 & PCF-3
S.Woods	ED	Member of BOD, Member of the Risk Committee	PCF-1, 8,11,18 & 43
I. Britchfield	INED	Member of All Chairperson of the Risk Committee	PCF-2, PCF-5
M. Kolodner *	NED	Member of All	PCF-2
A. Arena	NED	Member of BOD, Member of the Risk Committee	PCF-2
R. Frewen	INED	Member of All	PCF-2
R. Sullivan	INED	Member of All Chairperson of the Audit Committee	PCF-2, PCF-4

* resigned 2nd Jan 2020

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.

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 four times a year and the Chairperson of the Committee is an independent Non-Executive Director.

- Risk Committee

A separate Risk Committee was set up in Q2 2019 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 issues oversight;
- Timely reporting of material deviations from the defined risk appetite;
- Monitoring the effectiveness and independence of the Risk Management Function.

The Committee meets four times a year and the Chairperson of the Committee is an independent Non-Executive Director.

Independent Control Functions:

The Company has established the four key control functions in line with Solvency II requirements – risk management, compliance, actuarial, 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 role of Chief Risk Officer is held by the Group Director of Risk Management.

- 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 roles and responsibilities of the Compliance Officer are set out within the Compliance Policy. The Compliance Officer reports to the Board.

- Actuarial Function

The role of the Head of Actuarial Function ("HoAF") is outsourced to Willis Towers Watson. The HoAF ensures compliance with Solvency II obligations and reports to the Board.

- Internal Audit Function

The internal audit function is outsourced to PricewaterhouseCoopers. 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 at Group level.

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

- Board of Directors

The following changes in the composition of the Board took place within the last year:

Ian Clancy moved from an independent non-executive director to a non-executive director in April 2019 having served more than 9 years on the Board and retired from the board and committees on 19th June 2019.

Michelle Moore resigned as independent non-executive director on 25th September 2019.

Ruth Sullivan appointed independent non-executive director on 25th September 2019.

Robert Frewen appointed independent non-executive director 25th September 2019.

- Audit Committee

The following changes in the composition of the Audit Committee took place within the last year

Anna Arena resigned on 19th June

Ian Clancy resigned from the position of Chairperson prior to the June meeting

Michelle Moore acted as Chairperson for the June and September board meetings.

Ruth Sullivan was appointed to the position of Chairperson of the Audit Committee on 25th October

Robert Frewen appointed 17th December

- Risk Committee

The following changes in the composition of the Risk Committee took place within the last year:

Ian Britchfield was appointed to the position of Chairperson of the Risk Committee (PCF-5) on 20th May 2019

- Other PCF roles

Anna Arena resigned from the position of Head of Internal Audit (PCF-13) on 25th September 2019. Brett Wells was appointed to this role on the same date.

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

- B.1.3.1 The objective of the Company's Remuneration policy is to provide principles and guidelines for the Board and employees in the implementation of the Company's remuneration practices and procedures.

The Company achieves this through a robust performance management practice, which ensures equitable and, where appropriate, competitively benchmarked pay levels with incentives geared to agreed performance outcomes.

The variable remuneration potential for senior staff and directors is currently limited within the range of 5-30% of basic salary, this measure is in place to promote sound and effective risk management and discourage excessive risk

- 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 department and overall company objectives for the plan period as measured by the Company's Balanced Scorecard result. The Company does not currently operate a share or share option scheme.

- 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 is funded entirely by the Company.

The Company pays Pension scheme contributions of a percentage of basic salary for eligible employees.

An employee who is at least 18 years or older, becomes a plan participant on the first day of the month following the employee's completing one year of service with the Company.

Employees may 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.

The Company contributes a percentage of basic salary for eligible employees. A similar contribution is also allowed on annual or short-term bonus incentives.

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.

In addition to the excess of loss reinsurance agreement with NEIL and payment for services for those outsourced functions set out in section C.7 of this report; there were no material transactions with the Shareholder, with persons who exercise a significant influence on the undertaking and with members of the administrative, management or supervisory body.

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 with which all persons performing Controlled Functions or Pre-Approval Controlled Functions 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).

Further guidance on Guidance on Fitness and Probity Standards was issued in 2018 to assist regulated financial service providers in complying with their obligations under the F & P Standards, by setting out the steps which the Central Bank would expect a regulated financial service provider to take in order to satisfy itself on reasonable grounds that persons performing CFs or PCFs are compliant with the F & P Standards.

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

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

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

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

It also focuses on the documentation, controls and governance that are required to be in place to ensure compliance with the abovementioned 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 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 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 risk management system has been designed to identify, assess, manage and monitor and report exposure to risk. This is an ongoing process that is subject to continuous review and development.

Planning

Risk Management is an integral part of the planning processes and is incorporated into the Company's long-range planning, annual business planning, and ongoing operational activities. While long-range plans (aka Strategic Plans) and Three Year Business Plans are prepared at the Parent level, the Company's risk profile and Company specific business objectives are factored on an integrated basis into NEIL's Strategic Plan and Annual Business Planning processes.

Risk Identification and Assessment

Company specific Strategic Risk Assessments (SRAs) are conducted to re-evaluate known risks and identify potential emerging risks. The Company's SRA approach is consistent with its Parent and includes the following components:

- Identification and creation of a key risk inventory;
- Evaluation and prioritisation of risks;
- Determination of risk response;
- Review of the control environment;

Those risks deemed most critical to the Company are summarised and monitored via the Risk Dashboard and Key Risk Indicators. Since SRA is a continuous process, risks are assessed during the quarterly review of the Risk Dashboard and KRIs while the SRA "heat map" is updated at least annually as part of the Company's own risk assessment process. Findings from the SRA are integrated and considered in the preparation of a three year audit plan.

Measuring, Monitoring, Managing and Reporting Key Risks

The Risk Dashboard summarises the key risks identified during the SRA process and are supplemented by Key Risk Indicators (KRIs), which measure performance of individual risk elements in relation to defined tolerances.

The Risk Dashboard and KRIs are reviewed quarterly by Management and the Board and may be complemented with remediation plans and other information as appropriate. Risk monitoring and management is a continuous process and will be

undertaken as conditions change and/or when new opportunities or material risks are identified.

Major New Projects

Risk considerations shall be taken into account prior to all major new projects and reviewed regularly throughout the project lifecycle, with significant new risks reported to the Board for further consideration as early as practicable. Project risk assessments shall be reviewed and updated by the Risk Owner at appropriate intervals. If circumstances change significantly at any time, a new risk assessment shall be performed to capture key changes and to re-evaluate material risks.

Financial Modelling & Analysis

Financial modelling and analysis is conducted on a regular basis in order to confirm capital adequacy, stress test the portfolio, and validate business assumptions. Capital adequacy is assessed utilising the Standard Model, as well as forward looking capital forecasting models in support of the ORSA process. Stress testing of the portfolio under extreme adverse scenarios is conducted regularly in support of the ORSA and business planning processes.

Financial Modelling & Analysis is a continuous process and will be undertaken as conditions change and/or when new opportunities or material risks are identified.

B.3.2 Implementation of the Risk Management System

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

B.3.3 Implementation of the Risk Management Function

Activities for risk management is spread throughout the Company and the wider NEIL group. The risk management function is responsible for the oversight of the ongoing development of the risk management framework, strategy, related resource plan and making recommendations to the Board thereon. 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 Company adopts the “three lines of defence” governance model:

- **1st Line of Defence – Business Management:**

The first line of defence is responsible for the day to day management of risk and control within the business operations as well as delivering the strategy and optimising business performance within an agreed governance and risk framework.

- 2nd Line of Defence – Oversight:

The second lines of defence functions are made up of the risk management function, the compliance function and the actuarial function. The risk management function is responsible for the oversight of the ongoing development of the risk management framework, strategy, related resource plan and making recommendations to the Board thereon.

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 that are responsible for their specific areas.

The role of the actuarial function is outsourced to third party provider via the terms of a written Service Level Agreement (SLA). In addition to calculation of the technical provisions, the actuarial function is responsible for providing the Actuarial Opinion on Technical Provisions; the Actuarial Report on Technical Provisions; Opinions on Underwriting Policy, Reinsurance arrangements, and the ORSA process as well as an overall Actuarial Function Report.

- 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 Board includes three highly skilled and experienced independent Non-Executive Directors.

Further details on the composition and responsibilities of the Board are outlined in Section B.1.1.

The Audit Committee includes three highly skilled and experienced independent Non-Executive Directors.

Further details on the composition and responsibilities of the Audit Committee are outlined in Section B.1.1.

The Risk Committee is comprised of all Board Members.

Further details on the composition and responsibilities of the Risk Committee are outlined in Section B.1.1.

B.3.4 ORSA

B.3.4.1 ORSA Process

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

the potential impacts of its risk environment, and to enable the Company to make appropriate strategic decisions.

In designing its 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, Risk Assessment, Capital Management and Business Strategy.

Primary components of the Company's ORSA include:

- Risk Philosophy/Framework: The Company, in conjunction with its Parent company NEIL, protects its financial strength and optimizes risk-adjusted returns by:
 - Managing risks within defined tolerance levels
 - Measuring risk in an integrated manner across underwriting, investment and operational exposures, and by
 - Maintaining well-defined reporting and governance processes

The Company's risk management framework seeks to identify, assess, measure, monitor and manage risks on an integrated basis as further outlined in its Risk Management Policy.

- Governance Framework: The Company's Governance Framework is designed to deliver an effective system of governance which provides for sound and prudent management of the business, while being scaled for the complexity of the company. The organisational structure allows for the effective transmission of information, and where possible, appropriate segregation of responsibilities. Governance policies are documented, approved by the Board and regularly reviewed.

The Company's key governance and control documents are outlined in its Governance Framework. The Framework and supporting documents are available in the Company's Own Risk and Solvency Assessment (ORSA) resource library.

- Strategic Risk Identification and Assessment: As detailed in the Company's Risk Management Policy, Strategic Risk Assessments (SRAs) are conducted to evaluate known risks and identify potential emerging risks to the Company. The SRA process includes: identification and creation of a key risk inventory, evaluation and prioritization of risks, determination of risk response, and review of the control environment.

Findings from the SRA are integrated and considered in the preparation of the internal audit plan. Those risks deemed most critical to the Company are summarised in the Risk Matrix / Key Risk Indicators and presented in the Enterprise Risk Dashboard, which is updated quarterly.

- 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.
- Capital Solvency (point-in-time/forecast/stress and scenario testing): Financial modelling and analysis is conducted annually in order to confirm capital adequacy, stress test the portfolio, and validate business assumptions. Capital adequacy is assessed utilising the Standard Model, as well as forward looking capital forecasting models in support of the ORSA and ORSA processes.

All solvency capital assumptions are to be consistent with the Company's current risk profile. Stress testing of the portfolio under adverse scenarios is conducted annually in support of the ORSA and in preparation for the ORSA and business planning process.

Additional financial modelling and analysis may be conducted to evaluate the cost/benefit of alternative resources and review the economic analysis of primary risk transfer mechanisms (e.g., reinsurance). Financial Modelling & Analysis is a continuous process and will be undertaken as conditions change and/or when new opportunities or material risks are identified. The time horizon of the Company's forecast is set annually based on the company outlook and operating conditions. The stress scenarios are sufficient to provide an adequate basis for assessing the overall solvency needs and will involve a mixture of realistic and more extreme tests.

Reverse stress testing is completed to determine the adverse scenarios that could potentially cause a significant breach in the Company's own risk appetite tolerances.

- Forecast Business Activities, Risk Profile, Capital and Solvency: Analysis of the forecast business activities, risk profile (quantitative and qualitative), calculation and analysis of regulatory and economic capital, analysis of solvency margin cover and description and assessment of risk mitigation techniques.
- Actuarial: The Company's Actuarial Charter further outlines the roles and responsibilities of its expert third party resources, including calculation of the Company's technical provisions and standard model support.

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. An internal report will be presented under the following headings:
 - Introduction
 - Method and Assumptions
 - Overall Solvency Needs
 - Conclusions and Action Plans
 - Review & Approval
 - Distribution

B.3.4.2 ORSA Review and Approval Process

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

Once the Company Board approves the final draft of the assessment report, the Low/Medium-Low Risk own-risk and solvency assessment supervisory report ('ORSA supervisory report Low/Medium-Low') is submitted to the CBI within 2 weeks.

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

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

B.3.4.3 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 five year base case projection of the Solvency II Balance Sheets and Solvency Capital Requirements position is produced using the standard formula. 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 5 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 has adopted an Internal Control Policy (reviewed by the Board on an annual basis) The objectives of the Internal Control Policy and system are to provide Management with appropriate information to inform decision making and provide reasonable assurance that:
 - Assets are safeguarded against loss from unauthorised use or disposition;
 - Transactions are executed in accordance with Management's authorisation and recorded properly to permit the preparation of the financial statements in accordance with generally accepted accounting principles and statutory reporting requirements;
 - There is compliance with laws, regulations and Company policies. The Company's internal control framework is reviewed with the Board of Directors to ensure effective compliance with legislation.

An assigned Director has primary responsibility for the Company's Internal Control Policy and system. This Director ensures that policies and procedures are adopted that provide adequate control and accountability for operations, programs and resources. Designated individuals implement and maintain systems of internal control for their respective areas that provide reasonable assurance that the internal control standards defined within this policy are addressed.

NEIL has created a Compliance and Controls Committee (C&CC), of which the Company's Compliance Officer is a standing member. The C&CC is responsible for promoting and monitoring the use of effective controls and control awareness throughout the Company.

Primary Roles and Responsibilities of the Committee include preparation of an Annual Compliance Report, program assessment, coordination of the Three Year Internal Audit Plan, remediation plan review, compliance monitoring, occurrence assessment, training, communication, Compliance and Control Register implementation.

A Group internal audit plan is prepared on an annual basis that includes testing for the Company's processes and activities. The Managing Director and Compliance Officer review the plan and working with the Head of Internal Audit and the Audit Committee, highlight the audit focus of the Company. NEIL working with Company management and the internal audit function are responsible for the timing of the scheduled tests based on business needs and risk assessment. Reports are provided on the status of

schedule attainment, testing activities and audit findings to Management and the Audit Committee of the Board.

The compliance function also reports to the Board of Directors regarding Company compliance with the relevant legislation and the Company's plans to ensure compliance with any new requirements.

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 understanding of the legal and regulatory environment;
- Creation and maintenance of a compliance register;
- Management of compliance obligations (e.g. breach reporting);
- Monitoring and evaluation (e.g. regular review of the Compliance Register);
- Communication and reporting;
- Reviewing staff training processes so as to ensure appropriate compliance competencies.

The Compliance Officer prepares a Compliance Officer report for 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 insurance legislation and guidelines.
- Compliance plan activities
- Application of recommendations of the Insurance Supervision Directorate of the Central Bank.

B.5 Internal Audit Function

B.5.1 Implementation of The Internal Audit Function

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

In this regard, Internal Audit participates 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, the Audit Committee and the NEIL Compliance and Controls 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 PricewaterhouseCoopers.

B.6 Actuarial Function

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

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.
- Report to the Board.

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.

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

Critical Outsourcing Arrangements				
Outsourced Provider	Service Outsourced	Internal/External	Jurisdiction	Outsourcing Oversight
Marsh Management Services (Dublin) Limited	QRT preparation and SCR calculations	External	EU	Head of Compliance (PCF-13)
PGIM	Investment Managers (concurrent with NEIL)	External	EU	
NEIL	Support with key activities including Underwriting and Claims support	Internal	USA	
PricewaterhouseCoopers	Internal Audit (concurrent with NEIL)	External	USA	
Willis Towers Watson	Head of Actuarial Function	External	EU	
NEIL	Head of Risk Management Function	Internal	USA	
NEIL	Head of Internal Audit Function	Internal	USA	

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, aside from those already disclosed in Section B.1.2.

C. RISK PROFILE

The Company's long term risk management objectives are aligned with its parent and the common Risk Philosophy Statement is outlined below:

- Managing risks within defined tolerance levels;
- Measuring risk in an integrated manner across underwriting, investment and operational exposures;
- Maintaining well-defined reporting and governance processes.

Company specific Strategic Risk Assessments (SRAs) are conducted to re-evaluate known risks and identify emerging risks. The Company's SRA approach is consistent with its Parent and includes the following components:

- Identification and creation of a key risk inventory;
- Evaluation and prioritization of risks;
- Determination of risk response;
- Review of the control environment.

C.1 Underwriting Risk

C.1.1 Key Underwriting Risks

Underwriting risk at 31 December comprises 17% 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

The Company accepts insurance risk through its insurance contracts where it assumes the risk of loss from persons or organisations that are directly subject to the underlying loss.

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

While the Board retains ultimate authority for underwriting, the Company's underwriting and claim reserving practices are supported by its parent company (NEIL) and an affiliate (NEIL Services) respectively.

Underwriting objectives are outlined in the Company's Underwriting Policy while claims reserving practices are outlined in NEIL Services Claims Department Manual. Key risk considerations addressed in the respective policies include the classes and characteristics of the insurance business the Company is willing to accept, premium adequacy, underwriting limits, claims assessments and claims payment processes.

- 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.

Catastrophic modelling of NEIL Overseas insureds is conducted annually through the application of expert third party systems (e.g. RMS) and results are incorporated into NEIL Overseas Loss Estimation and Pricing processes.

C.1.2 Material Risk Concentrations

Natural catastrophe is considered as part of the safety case for each of the Company's Members Nuclear Power Plant locations. Due to the physical separation of the sites, the concentration element is most relevant for earthquake, with the majority of plants in low or between low and moderate risk zones.

Geographic Risk Concentration is considered as part of the catastrophic modelling, which is included within the loss estimate process.

Design based risk concentrations are mitigated by the coordinated exchange of operational experience worldwide within the Nuclear Industry; the nature of the plant designs and the emerging risk and project enterprise risk programs in place.

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;
- 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 at 31 December comprises 12% of the undiversified basic SCR.

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 sub-module	US\$'000
Concentration	332
Spread	7,773
Interest rate	3,468
Currency	474

- 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 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 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 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.

Currency risk is not considered material given the nature the Company's business.

C.2.2 Material Risk Concentrations

Concentration risk arises in respect of the deposits with credit institutions and the bonds. However, noting that point the Company continues to hold a well-diversified bond 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 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 comprises 71% 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.

- Reinsurance counterparties:

The main reinsurance counterparty with which the Company has a treaty (NEIL) 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 NEIL could be considered a material risk concentration to the Company, this is mitigated by the unique relationship between the Company and NEIL; the fact that currently almost all coverage is provided to NEIL Members; and the exceptionally strong surplus position of NEIL.

C.3.3 Prudent Person Principle Applied Ro 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;
- Retaining risk within an approved risk appetite and solvency requirements;
- Quarterly KRIs
- Monitoring changing environment and market conditions that affect risk;
- NEIL's reinsurance guidelines limit reinsurer participation, percentage, total aggregate exposure and minimum credit rating;
- NEIL's 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, as investments are managed such that no less than 90% of the investments could be liquidated without significant market impact over a period of several months or less.

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;
- Quarterly KRIs
- Forecasts are prepared regularly to predict required liquidity levels over both the short and medium term.
- The ORSA includes stress and scenario testing which is used to assess the risks under stressed conditions.

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 \$889K.

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 Conduct;
- Commitment of effective corporate governance.

C.6 Other Material Risks

The Company has included a range of non-quantifiable risks in its Strategic Risk Assessment and 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:

- Information Technology (internal Cyber Security)
- Regulatory and Compliance
- Reputational and Member Engagement
- Outsourcing
- Nuclear Industry
- Competitive Landscape
- Organisational Health
- Crisis Management
- Loss Prevention
- Governance

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)

NIL.

C.8 Stress and Sensitivity Tests

The Company's ORSA contains a base case and a series of adverse stress and reverse stress scenarios with the goal to assess the Company's ability to maintain sufficient SCR to withstand a variety of adverse events. The events have been analysed applying the Solvency II Standard Model and are designed to be progressive in nature; first applying a series of standalone stress events, then applying a clash occurrence, and finally a reverse stress event.

The results of the stress testing evidence that the Company is prudently capitalised on a net of reinsurance basis as a consequence of its low aggregate loss retention. Traditional insurance risks such as underwriting and reserve risks are therefore not material on a stand-alone basis under the Company's operating model.

Under its risk tolerance limits the Company aims to maintain a specified strategic solvency target. Where a breach of this solvency ratio is identified, as highlighted above, the Company

has an action plan in place. The action taken will be to alert the Central Bank of Ireland to the upcoming change and to call a meeting of the Board to confirm the capital actions needed to respond to ensure available capital returns to a level in excess of the SCR.

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 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		31/12/2018	
	Assets per GAAP	Assets per Solvency II	Assets per GAAP	Assets per Solvency II
	US\$'000	US\$'000	US\$'000	US\$'000
Fixed Income Securities	112,769	113,153	94,145	94,392
Deposits other than cash equivalents	0	1,765	0	6,891
Cash and Cash Equivalents	2,066	945	6,608	373
Reinsurance recoverables	5,732	3,540	5,663	3,154
Reinsurance Receivables	252	0	256	0
Property	49	49	79	79
Deferred Tax Asset	0	582	0	554
Accrued Interest	1,028	0	903	0
Other Assets	28	28	53	53
Total assets	121,924	120,062	107,707	105,496

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

- Fixed Income Securities

These are quoted instruments in active markets and therefore the market price as at 31 December 2019 has been applied. Adjustments for solvency purposes relate to the reclass of accrued interest on fixed income securities (being valuation at "dirty price": price of a bond valued including any interest that has accrued since issue of the most recent coupon payment).

- Cash and cash equivalents

Cash and cash equivalents are balances held on current accounts with credit institutions, they are valued at current market value.

Adjustments for solvency purposes relate to a reclassification of term deposits from Cash and Cash Equivalents to Deposits other than Cash equivalents.

- Deposits other than cash equivalents

Adjustments for solvency purposes relate to a reclassification of term deposits from Cash and Cash Equivalents to Deposits other than Cash Equivalents.

These are quoted instruments in active markets and therefore the market price as at 31 December 2019 has been applied.

- 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.

- Reinsurance Receivables

Adjustments for solvency purposes relates to the reduction of the premium provisions for premiums which are receivable, these balances have been reclassified as technical provision cashflows. This amount relates to actual business written for which premium receivables are not overdue. Deferred tax asset.

- Deferred Tax Asset

The Company has recorded a deferred tax asset as the cash flows from their relevant Basic Own Funds items result in a decrease in available capital when moving from Irish GAAP to Solvency II and the Company has therefore recognised future tax receivable on this capital.

D.2 Technical Provisions

D.2.1 Local GAAP and Solvency II Valuations

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

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

Insurance Class	31/12/2019		31/12/2018	
	TPs per GAAP	TPs per Solvency II	TPs per GAAP	TPs per Solvency II
Fire and other damage to property	US\$'000	US\$'000	US\$'000	US\$'000
Fire and other damage to property - Best estimate of liabilities (BEL)	22,404	20,761	21,931	20,789
General Liability - Best estimate of liabilities (BEL)	0	0	353	317
Risk margin	0	4,390	0	4,268
Total technical provisions	22,404	25,151	22,284	25,374

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 obtain the Solvency II technical provisions. Key points to note are as follows:

Cash-flows and discounting: Cash-flows have mostly been discounted using the USD risk free yield curve as at 31 December 2019 as published by the European Insurance and Occupational Pensions Authority ("EIOPA"). There are a limited number of policies written in Euros and these have been discounted using the relevant Euro risk free yield curve.

Solvency II classes of business: All of the business written by NEIL Overseas as at 31 December 2019 has been classified as "Fire and other damage to property" as no technical provisions are now held in relation to the one historic policy which was classified as "General Liability" as at 31 December 2018.

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.

Expenses: An allowance has been made for claims handling expenses.

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 area of particular uncertainty relating to the Company's liabilities is:

Given the high limits underwritten by the Company and the low level of retentions, the main uncertainty arises from the possibility that the reinsurers may fail to respond to a valid claim either through insolvency or dispute. However, the counterparty is the Company's parent Nuclear Electric Insurance Limited (NEIL) and so default is unlikely.

D.2.3 Solvency II and Local GAAP Valuation Differences of Technical Provisions by Material Line of Business

See analysis in Section D.2.1 – All of the business written by NEIL Overseas as at 31 December 2019 has been classified as “Fire and other damage to property”; “General Liability” business written in 2019 was NIL.

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 Company entered into an excess of loss reinsurance agreement with its parent, NEIL. The Company has an annual aggregate retention of US\$10M with losses above this being ceded to NEIL.

Total reinsurance recoverables (Solvency II valuation basis) at 31 December 2019 were US\$3.5m (2018: US\$3.1m). An analysis of the components of same together with an overview of the Solvency II valuation bases has been provided in Section D.1.1.

D.3 Other Liabilities

Other liabilities at 31 December 2019 were US\$3.9m (2018: US\$3.1m) and are mainly composed of amounts due to policyholders, retiree medical benefits payable, accrued expenses and taxation liabilities. Re Local GAAP versus Solvency II valuations: Insurance & Intermediaries payables were reduced to US\$240K due to their inclusion within the best estimates figure.

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.

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 five 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 five year time horizon used for business planning.

The Company has also received \$72million in capital contributions since its inception. These contributions are irrevocable, non-refundable and will not result in a grant by the Company of any rights or the assumption by the Company and obligations to the parent or any third party. These capital contributions have been approved by the CBI as Tier 1 Own Funds as per the Solvency II Directive.

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 an agreed 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 US\$000	Tier 3 US\$000	Total US\$000
01/01/2019	Opening balance comprising: Ordinary share capital Capital contributions Reconciliation reserve Deferred Tax Asset	10,000 72,000 (4,155) -	- 554	10,000 72,000 (4,155) 554
	Movement in the Reconciliation reserve for the year ended 31 December 2019	13,124	-	13,124
	Movement in deferred tax asset		28	28
31/12/2019	Closing balance	90,969	582	91,551
	Represented by:			
	Ordinary share capital	10,000	-	10,000
	Capital contributions	72,000	-	72,000
	Reconciliation reserve (comprising retained earnings and Solvency II adjustments)	8,969	-	8,969
	Deferred tax asset	-	582	582
	Total Basic own funds after deductions	90,969	582	91,551

The Company's ordinary share capital, capital contributions and reconciliation reserve are all available as tier 1 unrestricted own funds as per Article 69 (a)(1) of the Delegated Regulation. The negative reconciliation reserve equals the excess of liabilities over assets 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, no tier 2 own funds and tier 3 own funds of US\$582k.

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 US\$91.6m. This is comprised of Tier 1 unrestricted Basic Own Funds of US\$91.0m and Tier 3 Basic Own Funds of US\$582k.

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 US\$91.0m. This is comprised of Tier 1 unrestricted Basic Own Funds of US\$91.0m.

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	
	US'\$000
Solvency II - Basic Own Funds	91,551
Total Equity as per financial statements	95,625
Difference:	(4,074)
Represented by:	
Difference between Net Technical Provisions, insurance assets and liabilities and Best Estimate Liabilities	(266)
Risk Margin	(4,390)
Deferred tax asset	582
Difference:	(4,074)

- E.1.6 None of the Company's own funds are subject to the transitional arrangements referred to in Articles 308b(9) and 308b(10) of Directive 2009/138/EC.
- E.1.7 Tier 3 funds are made up of an amount equal to the value of deferred tax assets.
- E.1.8 No deductions are applied to own funds and there are no material restrictions affecting their availability and transferability.

E.2 Solvency Capital Requirement and Minimum Capital Requirement

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

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

	US\$'000
SCR	63,168
MCR	15,792

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	2018
	US\$'000	US\$'000
Market risk	8,686	7,976
Counterparty default risk	51,952	51,944
Non-life underwriting risk	12,728	12,645
Diversification	11,087	10,628
Basic Solvency Capital Requirement	62,279	61,936
Operational Risk	889	934
Overall Solvency Capital Requirement	63,168	62,870

Available Capital	91,551	78,399
SCR Cover	145%	125%

- 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		15,791,933				
Total MCR NL		2,347,363				
Cap		28,425,479				
Floor		15,791,933				
		Parameters				
		Cap		45%		
		Floor		25%		
		AMCR		2,808,500		
Line of Business		Net Technical Provisions	Net Premium Written	Parameters		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	0	10%	14%	0
Fire & Other Damage to Property		17,221,006	9,714,510	9%	8%	2,347,363
General liability insurance		0	0	10%	13%	0
Credit & Suretyship		0	0	18%	11%	0
Legal Expenses		0	0	11%	7%	0
Assistance		0	0	19%	9%	0
Miscellaneous Financial Loss		0	0	19%	12%	0
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 While the overall Solvency Capital Requirement has remained flat, the increase in available capital as a result of good underwriting results and investment performance has resulted in an increase in SCR cover.

E.3 Any Use of the Equity Risk Sub-Module in the Calculation of The Solvency Capital Requirement.

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

E.4 Internal Model Information.

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

E.5 Non-Compliance with the Minimum Capital Requirement and Significant Non-Compliance with the Solvency Capital Requirement.

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

E.6 Any Other Information.

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

F. **TEMPLATES**

The following QRTs are required for the SFCR.

QRT ref	QRT Template name
S.02.01	Balance Sheet
S.05.01/.02	Premiums, claims and expenses by Line of Business and 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
	C0010
Assets	
Intangible assets	R0030 -
Deferred tax assets	R0040 582
Pension benefit surplus	R0050 -
Property, plant & equipment held for own use	R0060 49
Investments (other than assets held for index-linked and unit-linked contracts)	R0070 114,918
Property (other than for own use)	R0080 -
Holdings in related undertakings, including participations	R0090 -
Equities	R0100 -
Equities - listed	R0110 -
Equities - unlisted	R0120 -
Bonds	R0130 113,153
Government Bonds	R0140 4,755
Corporate Bonds	R0150 102,564
Structured notes	R0160 -
Collateralised securities	R0170 5,833
Collective Investments Undertakings	R0180 -
Derivatives	R0190 -
Deposits other than cash equivalents	R0200 1,765
Other investments	R0210 -
Assets held for index-linked and unit-linked contracts	R0220
Loans and mortgages	R0230 -
Loans on policies	R0240 -
Loans and mortgages to individuals	R0250 -
Other loans and mortgages	R0260 -
Reinsurance recoverables from:	R0270 3,540
Non-life and health similar to non-life	R0280 3,540
Non-life excluding health	R0290 3,540
Health similar to non-life	R0300 -
Life and health similar to life, excluding health and index-linked and unit-linked	R0310
Health similar to life	R0320
Life excluding health and index-linked and unit-linked	R0330
Life index-linked and unit-linked	R0340
Deposits to cedants	R0350 -
Insurance and intermediaries receivables	R0360 -
Reinsurance receivables	R0370 -
Receivables (trade, not insurance)	R0380 -
Own shares (held directly)	R0390 -
Amounts due in respect of own fund items or initial fund called up but not yet	R0400 -
Cash and cash equivalents	R0410 945
Any other assets, not elsewhere shown	R0420 28
Total assets	R0500 120,062

Annex I
S.02.01.02
Balance sheet

Liabilities

Technical provisions – non-life
 Technical provisions – non-life (excluding health)
 TP calculated as a whole
 Best Estimate
 Risk margin
 Technical provisions - health (similar to non-life)
 TP calculated as a whole
 Best Estimate
 Risk margin
 Technical provisions - life (excluding index-linked and unit-linked)
 Technical provisions - health (similar to life)
 TP calculated as a whole
 Best Estimate
 Risk margin
 Technical provisions – life (excluding health and index-linked and unit-linked)
 TP calculated as a whole
 Best Estimate
 Risk margin
 Technical provisions – index-linked and unit-linked
 TP calculated as a whole
 Best Estimate
 Risk margin
 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 BOF
 Subordinated liabilities in BOF
 Any other liabilities, not elsewhere shown
Total liabilities
Excess of assets over liabilities

	Solvency II value C0010
R0510	25,151
R0520	25,151
R0530	
R0540	20,761
R0550	4,390
R0560	-
R0570	
R0580	-
R0590	-
R0600	
R0610	
R0620	
R0630	
R0640	
R0650	
R0660	
R0670	
R0680	
R0690	
R0700	
R0710	
R0720	
R0740	-
R0750	-
R0760	-
R0770	-
R0780	-
R0790	-
R0800	-
R0810	-
R0820	240
R0830	-
R0840	3,120
R0850	-
R0860	-
R0870	-
R0880	-
R0900	28,511
R1000	91,551

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)		Total
		Fire and other damage to property insurance	General liability insurance	
		C0070	C0080	
Premiums written				
Gross - Direct Business	R0110	27,970	-	27,970
Gross - Proportional reinsurance accepted	R0120	1,757	-	1,757
Gross - Non-proportional reinsurance accepted	R0130			
Reinsurers' share	R0140	20,012	-	20,012
Net	R0200	9,715	-	9,715
Premiums earned				
Gross - Direct Business	R0210	28,375	-	28,375
Gross - Proportional reinsurance accepted	R0220	1,249	-	1,249
Gross - Non-proportional reinsurance accepted	R0230			
Reinsurers' share	R0240	19,943	-	19,943
Net	R0300	9,681	-	9,681
Claims incurred				
Gross - Direct Business	R0310	(104)	-	(104)
Gross - Proportional reinsurance accepted	R0320	208	-	208
Gross - Non-proportional reinsurance accepted	R0330			
Reinsurers' share	R0340	-	-	-
Net	R0400	104	-	104
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	2,241	-	2,241
Other expenses	R1200			(16)
Total expenses	R1300			2,225

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	BE	CL	MX	PT	ES	
Premiums written	Gross - Direct Business	R0110	0	12,750	101	81	0	15,677	28,609
	Gross - Proportional reinsurance accepted	R0120	0	3	0	0	444	102	549
	Gross - Non-proportional reinsurance accepted	R0130							
	Reinsurers' share	R0140	0	8,585	68	54	299	10,623	19,629
	Net	R0200	0	4,168	33	27	145	5,156	9,529
Premiums earned	Gross - Direct Business	R0210	0	12,984	17	14	0	15,009	28,024
	Gross - Proportional reinsurance accepted	R0220	0	246	0	0	224	536	1,006
	Gross - Non-proportional reinsurance accepted	R0230							
	Reinsurers' share	R0240	0	8,907	12	9	150	10,465	19,543
	Net	R0300	0	4,323	5	5	74	5,080	9,487
Claims incurred	Gross - Direct Business	R0310	0	0	0	0	0	(348)	(348)
	Gross - Proportional reinsurance accepted	R0320	0	0	0	0	304	0	304
	Gross - Non-proportional reinsurance accepted	R0330							
	Reinsurers' share	R0340	0	0	0	0	0	0	0
	Net	R0400	0	0	0	0	304	(348)	(44)
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	0	961	8	6	33	1,189	2,198
Other expenses		R1200							(16)
Total expenses		R1300							2,182

Annex I

S.17.01.02

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 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

	Direct business and accepted proportional reinsurance		Total Non-Life obligation
	Fire and other damage to property insurance	General liability insurance	
	C0080	C0090	
R0010			
R0050			
R0060	5,391	-	5,391
R0140	3,540	-	3,540
R0150	1,851	-	1,851
R0160	15,370	-	15,370
R0240	-	-	-
R0250	15,370	-	15,370
R0260	20,761	-	20,761
R0270	17,221	-	17,221
R0280	4,358	32	4,390
R0290			-
R0300			-
R0310			-
R0320	25,119	32	25,151
R0330	3,540	-	3,540
R0340	21,579	32	21,611

Annex I

S.19.01.21

Non-life Insurance Claims Information

Total Non-Life Business

Accident year /
Underwriting year

Z0010	Accident Year
-------	---------------

Gross Claims Paid (non-cumulative)

(absolute amount)

Year	Development year											In Current year	Sum of years (cumulative)
	0	1	2	3	4	5	6	7	8	9	10 & +		
	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0170	C0180
Prior	R0100										-	R0100	-
N-9	R0160	2	-	2,945	-	-	-	-	-	-	-	R0160	-
N-8	R0170	-	-	-	-	-	-	-	-	-	-	R0170	-
N-7	R0180	-	-	3,949	-	-	-	-	-	-	-	R0180	-
N-6	R0190	-	-	-	-	-	-	-	-	-	-	R0190	-
N-5	R0200	-	23,116	6,252	13,179	18	-	-	-	-	-	R0200	-
N-4	R0210	-	-	-	-	8	-	-	-	-	-	R0210	8
N-3	R0220	-	-	7,068	5	-	-	-	-	-	-	R0220	5
N-2	R0230	-	5,497	57	-	-	-	-	-	-	-	R0230	57
N-1	R0240	-	14	-	-	-	-	-	-	-	-	R0240	14
N	R0250	3	-	-	-	-	-	-	-	-	-	R0250	3
Total												R0260	86
													62,111

Gross undiscounted Best Estimate Claims Provisions

(absolute amount)

Year	Development year											In Current year (discounted)	Sum of years (cumulative)
	0	1	2	3	4	5	6	7	8	9	10 & +		
	C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0360	
Prior	R0100										-	R0100	-
N-9	R0160	1,246	3,186	-	-	-	-	-	-	-	-	R0160	-
N-8	R0170	-	-	-	-	-	-	-	-	-	-	R0170	-
N-7	R0180	4,250	4,250	-	-	-	-	-	-	-	-	R0180	-
N-6	R0190	-	-	-	-	-	-	-	-	-	-	R0190	-
N-5	R0200	38,000	23,750	13,440	-	-	-	-	-	-	-	R0200	-
N-4	R0210	7,500	7,644	7,936	7,970	8,166	-	-	-	-	-	R0210	8,093.09
N-3	R0220	10,322	8,892	-	-	-	-	-	-	-	-	R0220	-
N-2	R0230	11,230	50	150	-	-	-	-	-	-	-	R0230	148.91
N-1	R0240	8,148	208	-	-	-	-	-	-	-	-	R0240	205.86
N	R0250	6,985	-	-	-	-	-	-	-	-	-	R0250	6,922.10
Total												R0260	15,370

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 (EU) 2015/35

Ordinary share capital (gross of own shares)
Share premium account related to ordinary share capital
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings
Subordinated mutual member accounts
Surplus funds
Preference shares
Share premium account related to preference shares
Reconciliation reserve
Subordinated liabilities
An amount equal to the value of net deferred tax assets
Other own fund items approved by the supervisory authority as basic own funds not specified above

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

Deductions

Deductions for participations in financial and credit institutions

Total basic own funds after deductions

Ancillary own funds

Unpaid and uncalled ordinary share capital callable on demand
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand
Unpaid and uncalled preference shares callable on demand
A legally binding commitment to subscribe and pay for subordinated liabilities on demand
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC
Other ancillary own funds

Total ancillary own funds

Available and eligible own funds

Total available own funds to meet the SCR
Total available own funds to meet the MCR
Total eligible own funds to meet the SCR
Total eligible own funds to meet the MCR

SCR

MCR

Ratio of Eligible own funds to SCR

Ratio of Eligible own funds to MCR

Reconciliation reserve

Excess of assets over liabilities
Own shares (held directly and indirectly)
Foreseeable dividends, distributions and charges
Other basic own fund items
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds

Reconciliation reserve

Expected profits

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

Total Expected profits included in future premiums (EPIFP)

	Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
	C0010	C0020	C0030	C0040	C0050
R0010	10,000	10,000			
R0030					
R0040					
R0050					
R0070					
R0090					
R0110					
R0130	8,969	8,969			
R0140					
R0160	582				582
R0180	72,000	72,000			
R0220					
R0230					
R0290	91,551	90,969			582
R0300					
R0310					
R0320					
R0330					
R0340					
R0350					
R0360					
R0370					
R0390					
R0400					
R0500	91,551	90,969			582
R0510	90,969	90,969			
R0540	91,551	90,969			582
R0550	90,969	90,969			
R0580	63,168				
R0600	15,792				
R0620	145%				
R0640	576%				
C0060					
R0700	91,551				
R0710	-				
R0720	-				
R0730	82,582				
R0740	-				
R0760	8,969				
R0770					
R0780	-				
R0790	-				

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	8,686		
R0020	51,952		
R0030	-		
R0040	-		
R0050	12,728		
R0060	(11,087)		
R0070			
R0100	62,279		

	C0100
R0130	889
R0140	
R0150	
R0160	
R0200	63,168
R0210	
R0220	63,168
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

		C0010			
MCR _{NL} Result	R0010	2,347		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
				C0020	C0030
Medical expense insurance and proportional reinsurance	R0020				
Income protection insurance and proportional reinsurance	R0030				
Workers' compensation insurance and proportional reinsurance	R0040				
Motor vehicle liability insurance and proportional reinsurance	R0050				
Other motor insurance and proportional reinsurance	R0060				
Marine, aviation and transport insurance and proportional reinsurance	R0070				
Fire and other damage to property insurance and proportional reinsurance	R0080	17,221		9,715	
General liability insurance and proportional reinsurance	R0090				
Credit and suretyship insurance and proportional reinsurance	R0100				
Legal expenses insurance and proportional reinsurance	R0110				
Assistance and proportional reinsurance	R0120				
Miscellaneous financial loss insurance and proportional reinsurance	R0130				
Non-proportional health reinsurance	R0140				
Non-proportional casualty reinsurance	R0150				
Non-proportional marine, aviation and transport reinsurance	R0160				
Non-proportional property reinsurance	R0170				

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	2,347
SCR	R0310	63,168
MCR cap	R0320	28,425
MCR floor	R0330	15,792
Combined MCR	R0340	15,792
Absolute floor of the MCR	R0350	2,809
		C0070
Minimum Capital Requirement	R0400	15,792