



XL Insurance Company SE

AN AXA GROUP COMPANY

Solvency and Financial Condition Report

**Year Ended
31 December 2019**

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Directors' Statement

The Board of directors of XL Insurance Company SE (the Board) acknowledges its responsibility for ensuring that this Solvency and Financial Condition Report (SFCR) has been properly prepared in all material respects in accordance with the Central Bank of Ireland (CBI) rules and Solvency II regulations. The Board confirms that there is a written Solvency II Disclosure Policy in place to ensure the ongoing appropriateness of any information disclosed. The Board is satisfied that:

(a) throughout the financial year in question, XL Insurance Company SE (the Company) has complied in all material respects with the requirements of the CBI rules and Solvency II regulations as applicable to the Company; and

(b) it is reasonable to believe that, at the date of the publication of the SFCR, the Company has continued to comply, and will continue to comply in future.

By order of the Board



P R Bradbrook

Director

21 April 2020



Y Slattery

Director

21 April 2020

Summary

Unless otherwise stated, all amounts in this report are presented in thousands of Euros (€'000), with the Euro being the Company's reporting currency in the Financial Statements. This includes the Quantitative Reporting Templates (QRT) included in Section E.

Effective January 18, 2019, the Company changed domicile from the United Kingdom to Ireland, and as such is now regulated by the CBI.

Effective December 31, 2019, the Company completed two European cross-border mergers, with entities also ultimately owned by AXA SA. These companies are AXA Corporate Solutions Assurance (ACS), which was a French domiciled commercial insurance company and AXA ART Verischerung AG (AXA ART), which was a German domiciled insurance company focusing on fine art and specie insurance. The impact is that none of the balances attributable to ACS or AXA ART are integrated into the income statement figures within this report. The balance sheets did transfer and thus are consolidated with the Companies legacy figures at December 31, 2019 where Irish GAAP Balance Sheet, Solvency II Balance Sheet, Own Funds and Solvency and Capital Requirement figures are presented.

Business and performance

The principal activity of the Company is the transaction of general (re)insurance business (the business). The business conducted is primarily commercial insurance, providing property, casualty, financial lines and specialty products to industrial, commercial and professional firms across its network of branches and through fronting partners.

The Company is a member of the AXA XL division within the AXA Group. The Company provides the main insurance company platform to operate under the AXA XL brand from branches within Europe and Asia Pacific. AXA XL, through its operating carriers, is a global insurance and reinsurance group of companies and other enterprises situated around the world.

AXA XL's operating entities underwrite both insurance and reinsurance business within its Global Property and Casualty (P&C), Global Specialty and Reinsurance business segments. The P&C segment is structured into two further segments International and North America. AXA XL underwrites across all the platforms available to best service both brokers and clients.

Further details of the Company's business and performance are provided in Section A below. Also refer to AXA's Annual Report for the year ended 31 December 2019 for additional information on the AXA Group's performance. A link to the 2019 earnings presentation is [here](#).

The Company was domiciled in the UK until 18 January 2019, when it redomesticated to Dublin, Ireland. The Company issues policies globally through its network of branches (or through the use of fronting partners) in the major locations of its (re)insurance clients and their respective (re)insurance risks. Its branches are in Europe and the Asia Pacific region. This allows the Company to service brokers and clients efficiently providing both local service and global expertise, ensuring that it is able to deliver solutions to the often complex risks of multinational companies. As the Company's clients expand into new and emerging markets, the Company seeks to ensure that it can support that international expansion with the capability to provide local (re)insurance solutions and local service. The Company also has subsidiary operations in Central and South America.

Gross premiums written have increased from €2,560m in 2018 to €2,940m in 2019. The premium growth was recognised across all operating business segments with the largest increases seen within the International P&C business and Global Specialty. International Property reported GWP growth over 2018 results of 20%. The largest growth areas within Global Specialty was Political, Risk Credit and Bond and Accident and Health lines with growth of 45% and 182% respectively.

Overall the final results are a loss before taxation of €69m (2018: €81m). The loss is reflective of two key items: 1) Large loss activity (excluding CAT) on the current accident year, particularly within International and North America Property. 2) Adverse prior year development (PYD) across North American Excess Casualty, International Casualty, and International Financial Lines. The total net adverse prior year development for the year was €62m (2018: €52m).

As a result of the impact of the aforementioned adverse PYD and large loss activity the combined ratio for the year was 123.1% compared to 113.1% in 2018.

The total investment return was a gain of €77m compared to a loss of €20m in 2018. Unrealised gains on investments were €53m in 2019 compared to a loss of (€52m) in 2018, driven by both the fixed income and equity securities held. The fixed income securities were impacted by the decreasing base rates in Europe and the United States of America (US), whilst the broader equity market increased during 2019, increased the value of the equity securities.

The Company holds investment grade fixed and variable income portfolios denominated in a variety of currencies, which correspond to the respective liabilities of the Company. Assets representing capital of the Company, which are not matched to specific liabilities, are generally held in Euro.

System of governance

The Board and management are committed to effective corporate governance and have established a comprehensive framework for the Company's operations. The key component of this framework is the Board, which has ultimate responsibility for the implementation and maintenance of an effective corporate governance framework, and the various Board and management committees through which the Board discharges its legal and fiduciary responsibilities.

The Board is responsible for the internal control framework and the Company operates a 'Three Lines of Defence' model where (1) the business, (2) risk management and compliance and (3) independent audit work together to ensure that risk management is effective.

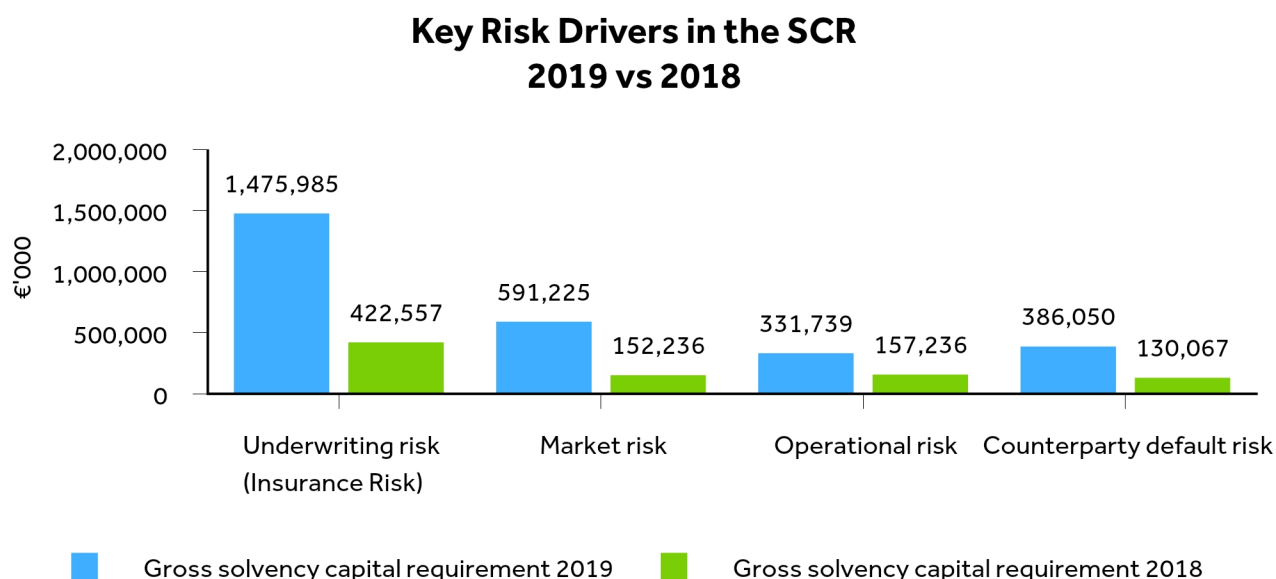
The risk management framework determines risk appetites and risk limits, establishes risk policies, identifies and manages the risks to the Company's objectives and monitors the capital requirements. All of this is captured by the Risk Management Framework (RMF) and Own Risk and Solvency Assessment (ORSA) activities that are carried out throughout the year with oversight by the Board. The Company is supported by a number of Group-wide processes in the achievement of its risk management objectives.

Further details of the Company's Systems of Governance are provided in Section B below.

No material changes were made to the Company's system of governance during the reporting period.

Risk profile

The key risks within the Solvency Capital Requirement (SCR) are shown below:



The risk profile of the Company, as a non-life insurance company, is dominated by underwriting risk. Underwriting and loss experience is reviewed regularly for, among other things, loss trends, emerging exposures, changes in the regulatory or legal environment as well as the efficacy of policy terms and conditions. Underwriting risk is also identified through:

- Business planning;
- Underwriting processes (including guidelines and escalation authorities);
- Reserving and claims processes;
- Enterprise Risk Management (ERM) risk assessment processes;
- The use of Realistic Disaster Scenarios (RDS) and other scenarios; and
- Independent underwriting peer reviews.

Underwriting risk is mitigated through the purchase of reinsurance, controls over the Actuarial function, rating adequacy, underwriting authorities and guidelines, and the new product process. The increase in Underwriting risk year on year is due to the inclusion of ACS and AXAART which has increased the value of claims provisions and expected to significantly increase the amount of net earned premium in 2020 onward.

Market risk for the Company is driven primarily by spread and interest rate risk from the bonds held against claims liabilities, and interest rate risk from both investments held and claims liabilities. There are also risk charges from the equities and investments in properties held. The increase compared to prior year, reflects primarily the inclusion of the ACS investment portfolio.

Operational risk at December 31, 2019 is driven by the gross claims reserves, as the standard formula mandates a 3% shock to reserves. This was capped at 30% of the Basic SCR for 2018. All other risk categories are less significant to the Company.

Further information on each separate category of risk can be found in detail in Section C below including a description of the measures used to assess these risks and a description of the material risks which XLICSE is exposed to.

Valuation for solvency purposes

An analysis of the valuation of non-technical assets and liabilities in the Solvency II balance sheet, together with the recognition and valuation bases applied, is provided in Sections D.1 and D.3.

Section D.2 discloses the value of technical provisions as well as a description of the bases, methods and main assumptions used for their valuation for solvency purposes.

Capital management

The Company is required to measure its assets and liabilities according to the European Solvency II Directive and its associated rules, regulations and guidelines. This regulatory framework for the European insurance industry adopts a dynamic risk-based approach based on economic principles that measure assets and liabilities to appropriately align insurers' risks with the capital they hold to safeguard policyholders.

The Company calculates its SCR using the Standard Formula.

	2019 €'000	2018 €'000
Total eligible own funds to meet the SCR	3,034,964	875,206
SCR	2,060,556	713,745
Ratio of Eligible own funds to SCR	147.3%	122.6%

The Company's objectives in managing its capital are to:

- Match the profile of its assets and liabilities, taking account of the risks inherent in the business;
- Maintain financial strength to support new business growth; and
- Satisfy the requirements of its regulators and policyholders.

The increase in eligible own funds and SCR is a result of the inclusion of ACS and AXA ART in the 2019 figures.

At 31 December 2019 the Company's Basic Own Funds were assigned to the Solvency II tiers as shown in the following table:

2019	Tier 1 - unrestricted €'000	Tier 2 €'000	Tier 3 €'000	Total €'000
Ordinary share capital	314,969	—	—	314,969
Share premium	274,187	—	—	274,187
Reconciliation reserve	1,866,773	—	—	1,866,773
Subordinated liabilities	—	53,586	—	53,586
Ancillary Own Fund item	—	500,000	—	500,000
Deferred tax asset	—	—	25,448	25,448
Total basic own funds after deductions	2,455,929	553,586	25,448	3,034,963

The classification into tiers is relevant to the determination of eligible own funds. These are the own funds that are eligible for covering the SCR and the MCR. No restriction applies to eligible own funds covering the SCR. As Tier 2 own fund items are subject to restrictions when covering the MCR, the amount of Tier 2 items eligible to cover the MCR is less than 100% of the total amount of Tier 2 items included in the table above. This is reflected in the table below:

	2019 €'000	2018 €'000
SCR	2,060,556	713,745
MCR	646,474	191,720
Total eligible own funds to meet the SCR	3,034,964	875,206
Total eligible own funds to meet the MCR	2,509,515	861,084
	%	%
Ratio of Eligible own funds to SCR	147.3%	122.6%
Ratio of Eligible own funds to MCR	388.2%	449.1%

The Company does not use any matching adjustment and has not used transitional adjustments to the relevant risk-free interest rate term structure or transitional measures on technical provisions. It has used the volatility adjustment for the first time in 2019.

The Company met all of the SCR and MCR compliance requirements during the reporting period.

Significant Business or other events

Significant events during the year include:

- Approval to re-domesticate to Dublin, Ireland from the UK as a response to the UK's decision to leave the EU. This process was completed on 18 January 2019.
- The Company reinsured 2018 accident year and prior year reserves effective 30 June 2019 to XL Bermuda Ltd (XLB). This contract ceded a portion of existing reserves, along with protection up to a limit on adverse development.
- Effective July 1, 2019, the Company through its Hong Kong branch received the branch business of the Hong Kong branch ("ACS HK") of AXA CS pursuant to a business transfer agreement dated 3 April 2019. As part of this, an instrument of transfer was then entered into to transfer all Hong Kong law-governed direct insurance and inward facultative reinsurance policies/contracts and approved by the Insurance Authority of Hong Kong as a scheme transfer pursuant to Section 25D of the Insurance Ordinance (Chapter 41 of the Laws of Hong Kong). The remainder of the assets and liabilities of ACS HK, including all outward facultative reinsurance, transferred through the business transfer agreement.
- Effective August 1, 2019, the Company through its Singapore Branch ("XLICSE SG") received the branch business of the Singapore branch ("ACS SG") of ACS pursuant to a business transfer agreement dated 22 July 2019. In connection with the transfer, XLICSE SG and ACS SG obtained an order of the Singaporean Court on 29 July 2019 to transfer all ACS SG branch business including direct insurance, inward and outward facultative reinsurance policies/contracts, under the terms of a statutory transfer scheme document dated 18 April 2019.
- Effective September 1, 2019, the Company through its Australia Branch ("XLICSE AUS") entered into a Transfer Deed with the Australian branch ("ACSA") of ACS which transferred the insurance business carried out by ACSA, including all insurance contracts, insurance assets, insurance liabilities, business assets and business liabilities relating to ACSA to the Australian branch of the Company. XLICSE AUS and ACSA obtained an order of the Australian Court to transfer all ACSA's branch business as contemplated under the Transfer Deed.
- Effective October 1, 2019 the Company received a capital contribution from its parent company, XL Insurance Holdings UK, of €1,286,713k representing the shares of ACS, an AXA entity whom AXA SA is the ultimate parent pursuant to the terms of a contribution agreement dated 27 September 2019 (as amended). Effective December 31, 2019, the Company subsequently completed its Cross-Border Merger with ACS, in accordance with the draft Terms of Merger dated June 28, 2019 as approved by the order of the Irish High Court dated 17 December 2019.
- On December 31, 2019, the Company completed its Cross-Border Merger with AXA Art, an AXA entity whom AXA SA is the ultimate parent, pursuant to the Terms of Merger dated August 27, 2019 as approved by the order of the Irish High Court dated 17 December 2019. Pursuant to the Terms of Merger, as consideration for the merger the Company issued shares to AXA Konzern AG equal to the fair market value of the entire issued share capital of AXA Art, being 55,812,589 of shares issued.
- Effective December 31, 2019 the Company received a capital commitment deed from XLB to provide €500m of capital should it be needed. The Company received approval from the CBI on 6 December 2019 to be able to recognize this as a Tier 2 Ancillary Own Fund item.

These impacted the solvency and financial condition as follows:

- Reinsurance to XLB decreased the underwriting risk within the SCR, as the reserve risk decreased in line with a reduction in net claims reserves, slightly offset by an increase in counterparty risk; and
- The company's Own Funds and SCR increased with the inclusion of ACS and AXA ART. This can be seen in all line items on the Solvency II balance sheet and within the SCR; and
- The capital commitment deed increased the ancillary own funds by €500m.

Significant events post year end:

Since December 2019, a significant number of cases associated with the Coronavirus, now called COVID-19 by the World Health Organization ("WHO"), have been reported worldwide. Initially reported in the province of Hubei in the People's Republic of China, it has spread across other countries, resulting in reported infections and deaths in numerous countries, including South Korea, Iran, Italy, Spain, France, the United Kingdom and the United States, and new cases and fatalities are reported daily. Furthermore, it is currently not possible to know or predict the extent to which the current levels of reported cases reflect the actual transmission of the virus within populations, and accordingly the scale of the pandemic may be significantly larger than what is presently recorded. The spread of COVID-19 has resulted globally in governmental authorities imposing quarantines and travel restrictions of varying scope; led to significant disruptions in the global travel and hospitality industries, and in global trade and supply chains more broadly; resulted in decreased economic activity and lowered estimates for future economic growth; created severe strains on local, national and supra-national medical and healthcare systems and institutions; and caused global financial markets to experience significant volatility and the worst downturn since the 2008 financial crisis.

XLICSE together with the AXA Group has or is in the process of establishing plans to address how it will manage the effects of the outbreak, and assess disruptions and other risks to its operations. These include the protection of employees, sustaining our services to clients and other stakeholders and ensuring effective processes are in place to communicate and execute such plans.

XLICSE is closely monitoring its exposure, including:

- The operational impact on its business;

- The consequences of a deterioration in macroeconomic conditions or of a slowdown in the flow of people, goods and services, especially on new business volumes;
- The extent of insurance coverage impacted; and
- Change in asset prices and financial conditions (including interest rates).

A. Business and Performance

A.1. Business

A.1.1 Name and legal form of the undertaking

XL Insurance Company SE was incorporated in the United Kingdom for the period until 18 January 2019 and incorporated in Ireland from 18 January 2019. The company is limited by shares. The registered office when the company was domiciled in the UK was:

AXA XL
20 Gracechurch Street
London
EC3V 0BG
United Kingdom

The registered office is:

AXA XL
8 St Stephen's Green
Dublin 2
D02 VK30
Ireland

A.1.2 Supervisory authorities

UK Regulators (until 18 January 2019)

Prudential Regulatory Authority
Bank of England
Threadneedle Street
London EC2R 8AH
United Kingdom

Financial Conduct Authority (FCA)
25 The North Colonnade
Canary Wharf
London E14 5HS
United Kingdom

Irish Regulator (post 18 January 2019)

Central Bank of Ireland
P.O.Box 559
New Wapping Street
North Wall Quay
Spencer Dock
Dublin 1
Ireland

Group Supervisor

Autorité de Contrôle Prudentiel et de Résolution (ACPR)
4, place de Budapest
CS 92459
75436 PARIS CEDEX 09
France

A.1.3 External auditor

PricewaterhouseCoopers
Chartered Accountants and Statutory Audit firm
One Spencer Dock
North Wall Quay
Dublin 1
Ireland

A.1.4 Company holders and position within legal structure of the Group

The Company's immediate parent is XL Insurance (UK) Holdings Limited, a company incorporated in England and Wales. The Company's ultimate parent undertaking is AXA S.A, a company incorporated in France.

The Company position within the legal structure of the Group can be seen from the simplified structure chart below:



A.1.5 Related undertakings

The Company is the parent entity of the following companies at December 31, 2019:

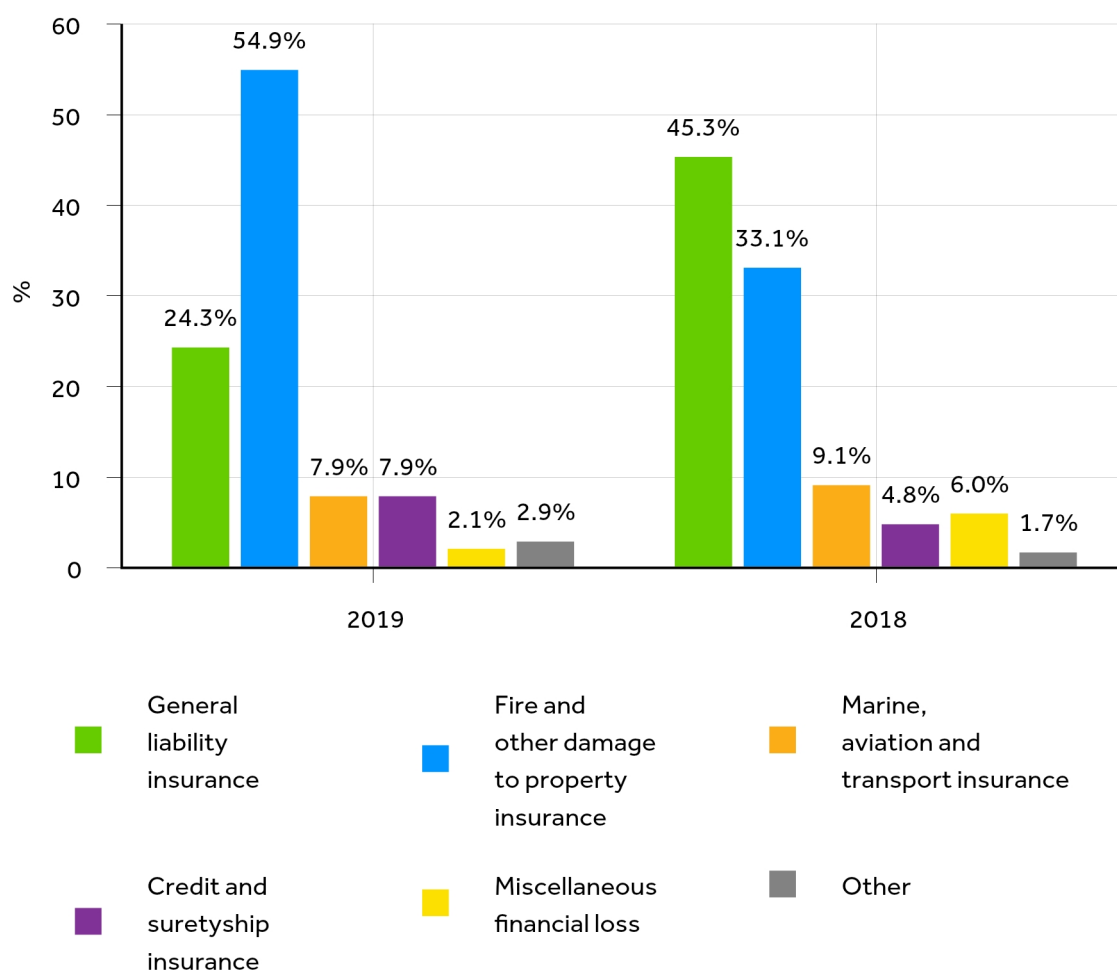
	Principal trading activity	Country of incorporation	Class of shares held	Percentage of nominal value and voting rights held
XL Insurance (China) Company Limited	Insurance Co.	China	Ordinary	49%
XL Seguros Brazil S.A.	Insurance Co.	Brazil	Ordinary	100%
AXA Corporate Solutions Brasil e America Latina Resseguros SA	Insurance Co.	Brazil	Ordinary	100%
AXA Corporate Solutions Seguros SA	Insurance Co.	Brazil	Ordinary	100%
AXA ART Holdings Inc.	Insurance Co.	United States of America	Ordinary	100%

A.1.6 Material lines of business and geographical areas

The Company issues policies globally through its network of branches (or through the use of fronting partners) in the major locations of its (re)insurance clients and their respective (re)insurance risks. Its branches are in Europe and Asia Pacific regions. This allows the Company to service brokers and clients efficiently providing both local service and global expertise, ensuring that it is able to deliver solutions to the often complex risks of multinational companies. As the Company's clients expand into new and emerging markets, the Company seeks to ensure that it can support that international expansion with the capability to provide local (re)insurance solutions and local service.

Gross Premium Written by line of business and geography are presented below:

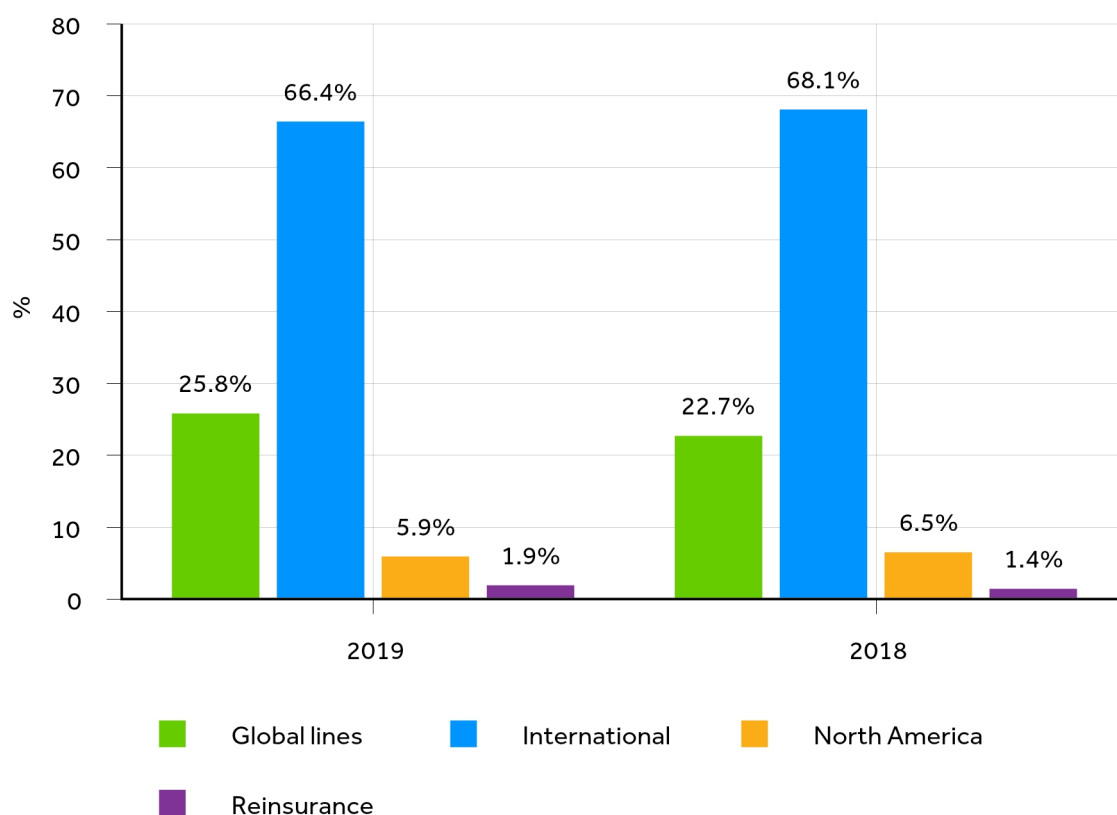
Gross Premium Written by Solvency II Business Mix



The lines of business which reflected year on year movements that warrant comment are:

- General liability insurance (reduction of 21.0%): International casualty and financial lines are the largest lines of business within this Solvency II category. The decrease compared to 2018 is a result of a change in mapping from management lines to Solvency II lines being applied, with some management lines now mapped to fire and other damage as noted below. Refer to next table which shows the consistency of business year on year.
- Fire and other damage to property insurance (increase of 21.8%): Refer to note above re: updated mapping.
- Other: This reflects increases in the reinsurance business that the Indian Branch of the Company writes.

Gross Premium Written by Business Mix



AXA XL manages its business units on a geographical and product basis with consideration towards legal entities. The term International is used to refer to non-North American geographies. These groupings are mapped into Solvency II lines of business for regulatory reporting purposes.

The International Group consists of the following:

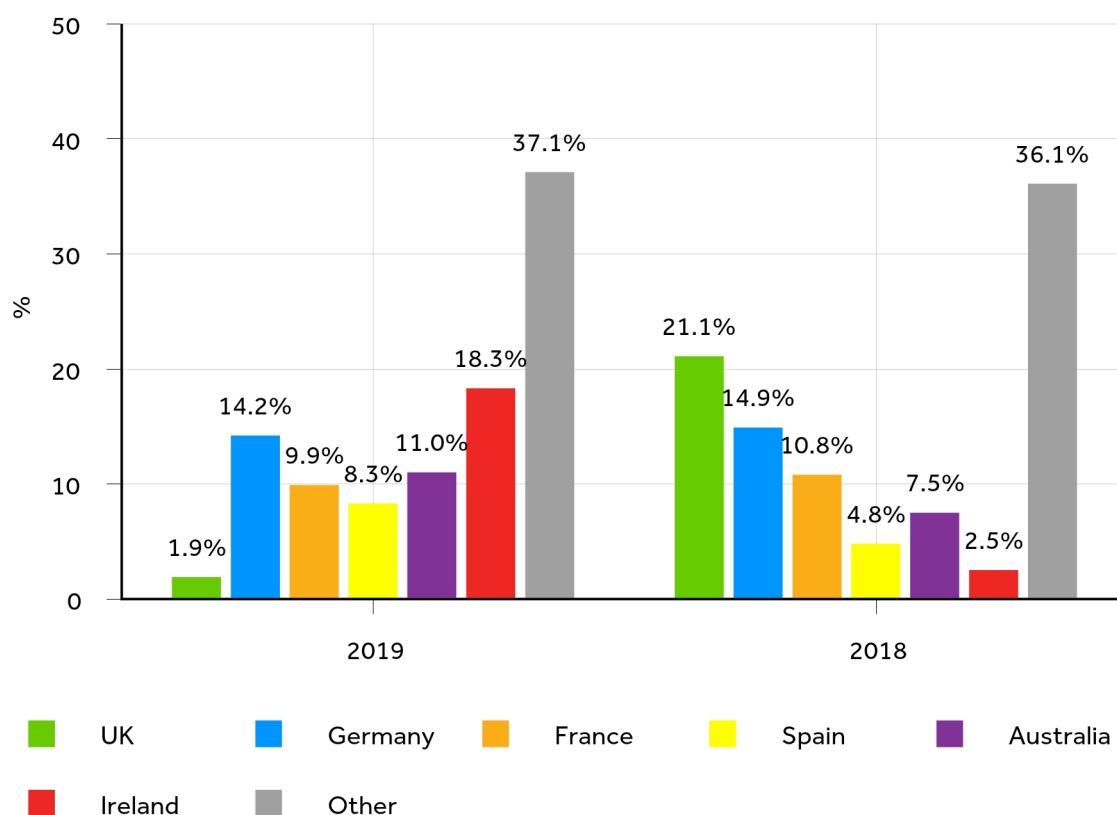
- International Property, which includes Construction, constitutes 24% (2018: 23%) of the Company's gross written premium and is comparable in size with International Casualty within the International Group. It is focused on the delivery of global insurance solutions to large sophisticated corporate clients.
- International Casualty constitutes a further 23% of gross written premium (2018: 25%) in the Company's portfolio. The Company specialises in the provision of insurance solutions for large global corporate clients utilising its global network. In addition to General Liability products, this category includes Environmental Pollution and Structured Risk Solutions.
- International Professional Financial Lines constitutes 14% of gross written premium (2018: 16%) in the Company's portfolio and includes Management Liability, Professional Liability, Crime and Cyber.

Global Lines constitutes 25.8% (2018: 23%) of the Company's gross written premium and includes Marine, Energy, Political Risk, Equine, Aerospace, Fine Art and Specie and Crisis Management.

North America constitutes 5.9% (2018: 7%) of the Company's gross written premium and includes a number of portfolios including Excess Casualty, North America Casualty and North America Property.

Reinsurance contributes 1.9% (2018: 1.4%) of the Company's gross written premium and represents business written from the India branch which commenced operations in 2017.

Gross Premium Written by Main Solvency II Geographic Areas



The main movements in geographic areas include:

- Reduction in the UK branch as this branch effectively stopped writing new business in 2019 as a result of the Company's Brexit planning. Some of the business was transferred to the Ireland operations, thus the increase noted on the Irish operations.
- The Australian branch increase was a result of a large program moving from a related entity onto the Company in 2019.

A.1.7 Significant events in the last reporting year

In January 2019, AXA XL completed the transfer of The Company from the UK to Dublin, Ireland, in response to the UK's decision to leave the EU.

The Company reinsured 2018 accident year and prior year reserves effective 30 June 2019 to XL Bermuda Ltd (XLB). This contract ceded a portion of existing reserves, along with protection up to a limit on adverse development.

Effective July 1, 2019, the Company through its Hong Kong branch received the branch business of the Hong Kong branch ("ACSHK") of AXA CS pursuant to a business transfer agreement dated 3 April 2019. As part of this, an instrument of transfer was then entered into to transfer all Hong Kong law-governed direct insurance and inward facultative reinsurance policies/contracts and approved by the Insurance Authority of Hong Kong as a scheme transfer pursuant to Section 25D of the Insurance Ordinance (Chapter 41 of the Laws of Hong Kong). The remainder of the assets and liabilities of ACS HK, including all outward facultative reinsurance, transferred through the business transfer agreement.

Effective August 1, 2019, the Company through its Singapore Branch ("XLICSE SG") received the branch business of the Singapore branch ("ACS SG") of ACS pursuant to a business transfer agreement dated 22 July 2019. In connection with the transfer, XLICSE SG and ACS SG obtained an order of the Singaporean Court on 29 July 2019 to transfer all ACS SG branch business including direct insurance, inward and outward facultative reinsurance policies/contracts, under the terms of a statutory transfer scheme document dated 18 April 2019.

Effective September 1, 2019, the Company through its Australia Branch ("XLICSE AUS") entered into a Transfer Deed with the Australian branch ("ACSA") of ACS which transferred the insurance business carried out by ACSA, including all insurance contracts, insurance assets, insurance liabilities, business assets and business liabilities relating ACSA to the Australian branch of the Company. XLICSE AUS and ACSA obtained an order of the Australian Court to transfer all ACSA' branch business as contemplated under the Transfer Deed.

Effective October 1, 2019 the Company received a capital contribution from its parent company, XL Insurance Holdings UK, of €1,286,713k representing the shares of ACS, an AXA entity whom AXA SA is the ultimate parent pursuant to the terms of a contribution agreement dated 27 September 2019 (as amended). Effective December 31, 2019, the Company subsequently completed its Cross-Border Merger with ACS, in accordance with the draft Terms of Merger dated June 28, 2019 as approved by the order of the Irish High Court dated 17 December 2019.

On December 31, 2019, the Company completed its Cross-Border Merger with AXA Art, an AXA entity whom AXA SA is the ultimate parent, pursuant to the Terms of Merger dated August 27, 2019 as approved by the order of the Irish High Court dated 17 December 2019. Pursuant to the Terms of Merger, as consideration for the merger the Company issued shares to AXA Konzern AG equal to the fair market value of the entire issued share capital of AXA Art, being 55,812,589 of shares issued.

Effective December 31, 2019 the Company received a capital commitment deed from XLB to provide €500m of capital should it be needed. The Company received approval from the CBI on 6 December 2019 to be able to recognize this as a Tier 2 Ancillary Own Fund item.

A.2. Underwriting performance

A.2.1 Underwriting performance: Current year

Since the Company prepares its financial statements in accordance with Irish GAAP, the underwriting performance information provided in this section is on a Irish GAAP basis unless otherwise stated.

The tables below provide the 2019 and 2018 gross written premiums and net earned premiums on a Solvency II Line of Business basis:

	2019							Total 2019 €'000
	Income protection insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Miscellaneous financial loss	Other	
	€'000	€'000	€'000	€'000	€'000	€'000	€'000	
Gross Written Premiums	72,761	223,810	1,791,913	561,576	250,233	34,748	5,905	2,940,946
Net Earned Premiums	15,950	55,560	389,723	120,516	17,159	8,399	37,563	644,870

	2018							Total 2018 €'000
	Income protection insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Miscellaneous financial loss	Other	
	€'000	€'000	€'000	€'000	€'000	€'000	€'000	
Gross Premiums Written	22,601	233,657	847,438	1,159,729	123,824	154,157	18,167	2,559,573
Net Premiums Earned	5,518	77,236	193,028	239,285	25,415	38,326	15,280	594,088

The business is not managed on a Solvency II basis, however the only significant difference from Irish GAAP is in the net loss ratio which is driven by the Solvency II adjustments to arrive at the economic balance sheet position.

The table below provides the 2019 and 2018 key performance indicators on a Irish GAAP basis:

	2019 €'000	2018 €'000
Gross Premiums Written	2,940,946	2,559,573
Net Premiums Earned	644,870	594,086
Net Loss Ratio	74.0%	80.0%
Combined Ratio	123.8%	113.1%

Gross premiums written increased by 13% (circa €381m) when compared to the previous year, largely due to the continued strategic alignment of the businesses written on the International carriers of the AXA XL Division.

Overall the final results are a loss before taxation of €69m (2018: €81m). The loss is reflective of two key items: 1) Large loss activity (excluding CAT) on the current accident year, particularly within International and North America Property. 2) Adverse prior year development (PYD) across North American Excess Casualty, International Casualty, and International Financial Lines. The total net adverse prior year development for the year was €62m (2018: €52m).

The tables below provide the 2019 and 2018 Gross Premiums Written and Net Premiums Earned performance by geographical area:

2019	IRELAND	GERMANY	FRANCE	ITALY	AUSTRALIA	NETHERLANDS	OTHER	TOTAL
	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000
Premiums written								
Gross Premiums Written	538,311	418,079	290,317	147,349	323,905	166,325	1,056,660	2,940,946
Premiums earned								
Net Premiums Earned	58,582	120,780	73,273	40,937	56,198	48,304	246,796	644,870

2018	GB	GERMANY	FRANCE	ITALY	AUSTRALIA	SWITZERLAND	OTHER	TOTAL
	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000
Premiums written								
Gross Premiums Written	541,096	380,328	276,645	123,021	192,381	172,449	873,652	2,559,572
Premiums earned								
Net Premiums Earned	85,053	92,717	70,811	35,943	32,515	36,901	240,146	594,086

The main movements in geographic areas include:

- Reduction in the UK branch as this branch effectively stopped writing new business in 2019 as a result of the Company's Brexit planning. Some of the business was transferred to the Ireland operations, thus the increase noted
- The Australian branch increase was a result of a large program moving from a related entity onto the Company in 2019.

A.3. Investment performance

The primary objective of the Company's investment strategy is to maximize the risk adjusted return on economic capital employed subject to a variety of constraints including: maintaining adequate regulatory and rating agency capitalization; maintaining sufficient liquidity to ensure payment of claims, operating expenses and other obligations even during stressed scenarios; and generating stable net investment income.

The Company holds investment grade fixed and variable income portfolios denominated in a variety of currencies, which correspond to the respective liabilities of the Company. Assets representing capital of the Company, which are not matched to specific liabilities, are generally held in EUR.

The Company uses a fair value hierarchy for its fixed income and equity portfolios that prioritizes inputs to its valuation techniques which are used to measure fair value. The hierarchy gives the highest priority to unadjusted quoted prices in active markets for identical assets, 6% of the total portfolio, and then quoted prices in markets that are not active or inputs that are observable either directly or indirectly (92% of the total portfolio). The equity accounting method is used for the Affiliates holdings, 2% of the total portfolio.

The total investment return was a gain of €77m compared to a loss of €20m in 2018. Unrealised gains on investments were €53m in 2019 compared to a loss of (€52m) in 2018, driven by both the fixed income and equity securities held. The fixed income securities were impacted by the decreasing base rates in Europe and the US, whilst the broader equity market increased during 2019, increasing the value of the equity securities.

A.3.1 Investment performance during the reporting period

Net income and expenses arising from investments by asset class during the reporting period were as follows:

Solvency II Asset Class	Net investment return 2019	Net investment return 2018
	€'000	€'000
Investment Fund		
Equities Fund	30,110	(7,694)
Bonds		
Government Bonds	37,020	5,922
Corporate Bonds	36,190	(304)
Collateralised securities	—	844
Cash and cash equivalents	(19,014)	(12,031)
Investment management expenses	(6,782)	(6,397)
	77,524	(19,660)

Below are components of the net investment return:

	2019	2018
	€'000	€'000
Income from financial investments	15,978	21,227
Net gains on the realisation of investments	15,407	18,469
Unrealised losses on investments	52,921	(52,959)
Investment management expenses	(6,782)	(6,397)
	77,524	(19,660)

A.3.2 Gains and losses recognized directly in equity

Realised gains and losses on investments are calculated as the difference between sale proceeds and purchase price.

Unrealised gains and losses on investments represent the difference between their valuation at the balance sheet date and their purchase price or, where acquired in previous years, their valuation at the last balance sheet date, together with the reversal of unrealised gains and losses recognised in earlier accounting periods in respect of investment disposals in the current period.

All investment gains and losses are recognized in the income statement.

A.3.3 Investments in securitisation

The Company invested in asset backed securities with a market value of €131m at December 31, 2019 (2018: €196m)

	2019	2018
	€'000	€'000
Agency mortgage-backed securities	404	131,569
Collateralised loan obligations	127,870	—
Covered Bonds *	—	63,460
Other asset-backed securities	2,273	1,065
Total Fixed Income investments in securitisations	130,547	196,094

* **Covered bonds** are debt securities backed by cash flows from mortgages or public sector loans. They are similar in ways to asset-backed securities created in securitisation, but covered bond assets remain on the issuer's consolidated balance sheet (usually with an appropriate capital charge).

A.4. Performance of other activities

Other income and expenses are set out below:

	2019	2018
	€'000	€'000
Gain/(Loss) on foreign exchange	6,789	20,572
Impairment of Group undertakings	(105)	(1,394)
Other (charges)/Income	(4,542)	(3,295)
	<u>2,142</u>	<u>15,883</u>

The Company operates in a number of overseas branches. Each overseas branch determines its own functional currency based on factors specific to its operations and is usually the currency of the primary economic environment in which it operates. Foreign exchange (FX) gains and losses resulting from the settlement of foreign currency transactions and the translation of foreign currency denominated monetary assets and liabilities at year end exchange rates are recognised in the income statement as part of other charges.

The Company has no leases classified as finance leases throughout the reporting period.

Leases, where a significant portion of the risks and rewards of ownership are retained by the lessor, are classified as operating leases. Payments made by the Company for operating leases are charged to the statement of profit or loss on a straight-line basis over the period of the lease.

Total operating lease charges paid during the year:

	2019	2018
	€'000	€'000
Land and buildings	1,646	1,183
Other leases	4	29
	<u>1,650</u>	<u>1,212</u>

A.5. Any other information

The Company has not availed itself of any transitional arrangements following the introduction of the Solvency II Directive.

There is no other material information regarding the business and performance of the undertaking.

B. System of Governance

B.1. General information on the system of governance

This section provides details of the Company's Board and management structure along with roles, responsibilities and Committees.

The Company's governance framework begins with the Board and the Board Committees (for further information see below). No material changes were made to the Company's system of governance during the reporting period.

The Board is composed of a mixture of executive and non-executive directors.

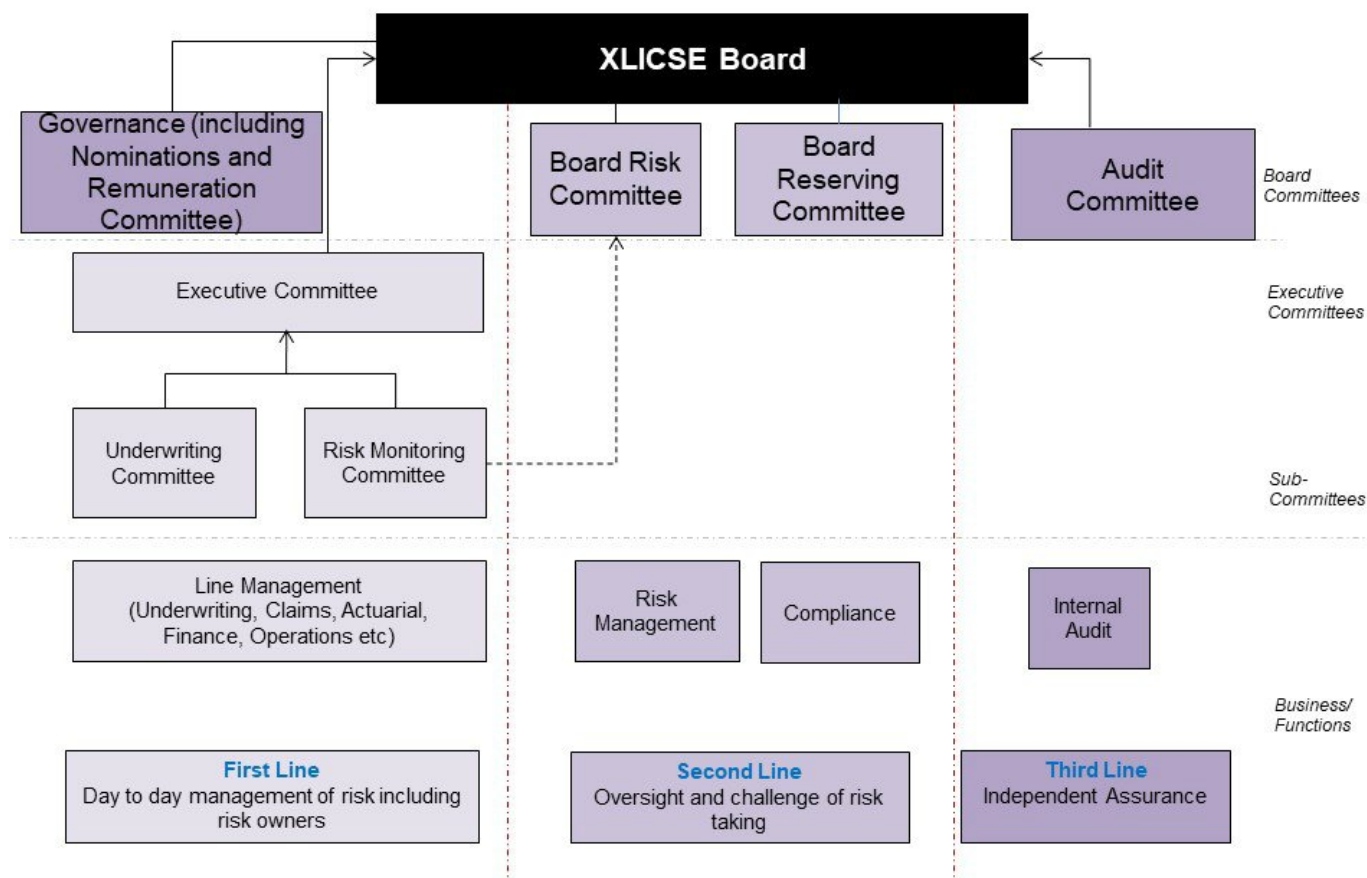
The names of the persons who are directors of the Company as at the date of this report are:

Bryan Joseph	Independent Non-Executive Director, Chair of the Board, the Governance Committee and the Reserving Committee
Paul Wilson	Independent Non-Executive Director, Chair of the Board Risk Committee
Julie O'Neill	Independent Non-Executive Director and Chair of the Audit Committee
Doina Palici-Chehab	Non-Executive Director
Helen Browne	Non-Executive Director
Paul Bradbrook	Non-Executive Director
Yvonne Slattery	Executive Director, Chief Operating Officer

Board meetings are held six times a year with additional meetings held as required. Detailed Board reports are prepared and circulated in advance of meetings, addressing all major areas of the Company's operations, encompassing underwriting performance, financial results, risk management, compliance and reserving.

Governance structure

XLICSE Governance Structure



The Board seeks to ensure that the operations of the Company are conducted within a framework of prudent and effective controls that enables effective risk management, and conformity with the applicable legal and regulatory requirements.

The Board sets the risk appetites for the Company. Management are responsible for monitoring risks against risk appetite and for escalating any risks that breach risk appetite to the Board.

The Board recognises the need for strong organisational governance to ensure there is effective oversight of the management of the business, that senior management exercise their responsibilities appropriately, and that robust internal systems and controls are in place. The Board comprises of members of the executive management team and non-executive Directors.

In addition, the Board has four Board Committees, the Governance Committee (including nominations and remuneration), Board Risk Committee, Board Reserving Committee and Audit Committee. Supplementing the governance structure are three formal management committees: the Executive Committee (ExCo), Risk Monitoring Committee (RMC) and Underwriting Committee (UC). Both the RMC and UC report to the ExCo, and the RMC reports to the Board Risk Committee.

The Company undertakes a thorough strategic planning process considered within the overall strategy of the AXA XL division and overseen by the Board. The ExCo is responsible for implementing the Company's strategy and for the on-going oversight and management of the risks associated with the strategy.

The ExCo is responsible for ensuring there is a governance framework in place to support the delivery of the Company's strategic plan by the business. The Company undertakes regular Board effectiveness and Governance reviews to ensure the governance framework is effective and appropriate.

The Board is satisfied that the Company's system of governance is appropriate and effective, taking into account the nature, scale and complexity of the risks inherent in the Company's business.

Internal controls

The Company operates a 'Three Lines of Defence' approach to ensure effective and robust day to day governance is in place. The Operational, or the 'first line of defence', starts with the employees, who are tasked with identifying and managing risk on a day to day basis as part of their roles. They are supported by the 'second line of defence', which is made up of oversight functions - specifically Risk Management including (Internal Control Framework and Financial Internal Control) and Compliance. These functions have responsibility for overseeing and challenging day to day management, control and reporting of risks. The Risk oversight functions are independent of management and individuals with responsibility for taking on risk exposures. The Internal Audit Function provides the 'third line of defence', which provides independent assessment of the effectiveness of the Company's system of internal control and reports to the Audit Committee.

In addition, the Company operates a Framework for Internal Control process which provides assurance on the controls around financial reporting.

Audit Committee

The Audit Committee is responsible for oversight and review of external and internal audit processes and consists of non-executive directors. In the case of the external audit process, this involves reviewing the terms of engagement of the external auditors, their proposed audit scope and approach and their performance in the preparation of the statutory financial statements and any external reporting requirements. Updates on the internal control framework are reported to the Audit Committee. In the case of the internal audit function, the role involves agreeing and monitoring the nature and scope of work to be carried out. This is aimed at providing assurance to management that the internal control systems are appropriate for the prudent management of the business and are operating as planned.

Board Risk Committee

The Board Risk Committee consists of non-executive directors and is attended by members of senior management. Key responsibilities of this committee include advising the Board in relation to material risk issues relating to, or arising from, the Company's strategy, risk appetite and tolerances; providing review and appropriate challenge to the risk strategy, risk appetite, stress testing, and oversight arrangements (including oversight of the executive management of risk) and to oversee and challenge the Risk Management and Compliance functions.

Board Reserving Committee

The Board Reserving Committee consists of both non-executive directors and key executive management. The key responsibility of this committee is to oversee and challenge the Company reserving processes and practice.

Governance Committee

The Governance Committee examines matters of governance, board composition and remuneration on behalf of the Board. The Governance Committee is a nomination committee with some limited additional responsibilities for remuneration.

Executive Committee

The ExCo is responsible for the development and implementation of the strategy for the Company. This includes assessment of the performance of the business to ensure risks associated with the strategy and its implementation are understood and managed with action taken to mitigate those risks and challenges in line with the risk appetite of the Company. The Board has approved the risk policies which forms the RMF and has charged day to day monitoring of it to the RMC.

Underwriting Committee

The UC monitors and oversees the underwriting strategy, policy and appetite for the Company. The UC also advises, makes recommendations and escalates (where necessary) issues to the ExCo.

Risk Monitoring Committee

The RMC oversees the RMF of the Company, including those risks emanating from jurisdictions outside of Ireland.

Key Functions

The Company's risk management, compliance, internal audit and actuarial functions are the key functions in its system of governance (Key Functions). Holders of Key Functions are authorised to operate free from influences which may compromise their ability to undertake their duties in an objective, fair and independent manner.

Each of these Key Functions holders:

- Operates under the ultimate responsibility of, and reports to the Board or Board Committee as appropriate;
- Cooperates with the other functions, where appropriate, in carrying out their roles;
- Is able to communicate, at their own initiative, with any staff member and have the necessary authority, resources and expertise and have unrestricted access to all relevant information necessary to carry out their responsibilities; and
- Promptly reports any major problem in their area of responsibility to the Board.

There should be as much independence between functions as possible and the individuals carrying out the internal audit function do not assume any responsibility for any other function.

The Company has written policies in place in relation to risk management, internal audit, compliance and the actuarial function and further information on these functions is contained within sections B3 (Risk Management), B4 (Compliance function), B5 (Internal Audit) and B6 (Actuarial Function). The implementation of Key Functions within the Company is explained below.

As well as the required Key Functions, the Board has designated underwriting, finance and claims as functions which are of specific importance to the sound and prudent management of the Company. The finance function reports directly to the Board. The risk management, compliance, claims and actuarial functions report to the Board Risk Committee and Board Reserving Committee whilst internal audit reports to the Audit Committee.

The underwriting, finance, claims, risk management, actuarial and compliance functions are members of the ExCo.

Remuneration policy and practices

Remuneration Principles

The AXA XL Division of AXA Group, of which the Company is a part, maintains a Remuneration Policy, the purpose of which is to outline how the Company ensures that the setting of remuneration is appropriate and transparent, and promotes sound and effective risk management within approved risk tolerance limits. The Company formally adopted the AXA XL Division Policy and operated in conformity with it throughout 2019. The Remuneration Policy contains a multi-tiered governance and compliance structure including oversight at the AXA Group, AXA XL Division and Company levels. Together, the AXA Group and AXA XL Remuneration Policies are designed to support AXA Group and AXA XL's long-term business strategy and to align the interests of its employees and other stakeholders, by:

- Establishing a clear link between performance and remuneration over the short, medium and long term;
- Ensuring that the Company can offer competitive compensation arrangements across the multiple markets in which it operates while avoiding potential conflicts of interest that may lead to undue risk taking for short-term gain; and
- Ensuring compliance with Solvency II regulations and any other applicable regulatory requirements.

The balance of fixed and variable compensation is consistent with competitive market practice in the insurance industry, while permitting the Company to operate fully flexible variable compensation policies. Variable pay for colleagues in independent control functions is not aligned with the performance of the businesses they oversee and is designed to avoid conflicts of interest while appropriately balancing risk and reward.

An overview of the arrangements that are in place are as follows:

- Fixed Remuneration (comprised of base salary and other fixed allowances) - The Company considers multiple factors - including an individual's role and responsibilities, performance, experience, expertise and peer market compensation information in setting target levels of base compensation.
- Variable Remuneration - Individual bonus awards are determined based on performance reviews of individual and overall performance and are fully discretionary, allowing for full flexibility to award no variable remuneration if

warranted. Staff have a bonus target amount expressed as a percentage of base pay. Individual bonus pay-outs are capped at 200% of individual target, which prevents employees from taking excessive risks to obtain an excessive pay-out.

- Long-Term Incentive Plan - Long-term incentive awards are reserved for those who perform at a high level, with the recipient's anticipated future contributions, individual potential and unique skills taken into consideration. Grants of long-term incentives are based on sustained individual performance and criticality of skills.

Supplementary Pension Schemes

The Company's remuneration program does not include any supplementary pension or early retirement schemes for members of the Board or its other Key Function holders.

Material related party transactions

The Company actively monitors all related party transactions. The material transactions with shareholders, persons who exercise a significant influence on the undertaking, and with members of the administrative, management or supervisory body include the intra-Group reinsurance arrangements, and payments in respect of services provided to the Company.

During 2019 the Company received two capital injections from its immediate parent company totalling €90m (2018: €111m). These were provided to ensure that a sufficient buffer was maintained over its SCR capital requirement. These capital injections illustrate the continued support the Company has from the Group. The Company also received shares in ACS as a capital contribution with a value of €1.3bn.

B.2. Fit and proper requirements

B.2.1 Qualifications of the Board and Key Function holders

The Board regularly considers the qualifications necessary for its members. In this regard, the Board believes that its members should be persons with superior business judgement and integrity, who have knowledge or experience in the areas of insurance, reinsurance, financial services or other aspects of the business, operations or activities, and who have distinguished themselves in their chosen fields of endeavour. In addition, the Board believes its members should have the talent and vision to provide oversight and direction in the areas of strategy, operating performance, corporate governance and risk management in order to protect the interests of the shareholder and the policyholder whilst maintaining the highest standards of ethical business conduct. The Company supports these objectives through an ongoing program of Board training. The Board believes that each of its Directors contributes a strong background and set of skills to enable the Board to meet its responsibilities and that Key Function and Senior Management Function holders possess the skills, knowledge and expertise to carry out their regulatory obligations.

The Board considers diversity among other factors in assessing the skills and characteristics of Director candidates and the Board as a whole. This consideration includes a broad evaluation of diversity of viewpoints, skills, experience and other demographics represented on the Board as a whole. This discussion and evaluation of diversity occurs at the Governance Committee with recommendations made to the Board.

B.2.2 Recruitment process

All permanent recruitment within the Company is undertaken in line with the standard AXA XL recruitment process.

Human Resources (HR) undertake, on an outsourced basis, a series of checks in relation to a candidate after an offer has been communicated to them. The offer of employment is made subject to the satisfactory completion of detailed relevant background checks. These checks are commensurate to the seniority of the position and if the checks are not completed to the Company's satisfaction or the candidate provides false or misleading information, the Company reserves the right to withdraw the contract. For Senior Management Functions, Key Function Holders and Certification Regime positions these checks include:

- Electoral roll and address search
- Credit review
- Employment history and references
- Academic qualifications
- Identity check
- Prior directorships search
- Compliance database check
- Professional membership and qualifications

B.2.3 Code of conduct

The Company operates a Compliance & Ethics Code & Supplement (the Code) that all employees must adhere to. The Code explains the standards expected of all employees and underpins the Company's values and behaviours. The Code applies to all employees, officers and directors, including the independent directors on the Company's Board. The Company seeks to work with business partners and others who share our values and standards and expect them to behave consistently with the provisions of the Code.

B.2.4 Fit & Proper Reassessment

The CBI fitness and probity standards apply to all Directors and a number of other key roles within the Company, including those relating to the control functions. Each Director and Key Function holder is required to provide an annual confirmation that the information recorded in the probity questionnaire at the time of recruitment or appointment remains valid, or provide an update for reassessment by Compliance/HR.

The confirmation includes an acknowledgement of the CBI fitness and probity standards, discloses any material developments in relation to his/her compliance with the standards of which the Company should be aware and confirms agreement to notify the Company without delay if the individual no longer complies with the standards.

The holders of specific roles which are designated as Pre-approved Controlled Functions (PCF) require the advance approval of the CBI. All employees are subject to a performance appraisal process, which evaluates, on an ongoing basis, employee's continued fitness for their roles and responsibilities and identifies any necessary training and development needs.

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

B.3.1 Risk Management Framework (RMF)

The Company faces strategic, financial and operational risks related to, among others: underwriting activities, financial reporting, changing macroeconomic conditions, investment, reserving, changes in laws or regulations, information systems, business interruption, and fraud. An enterprise view of risk is required to identify and manage the consequences of these common risks and risk drivers on the Company's profitability, capital strength, and liquidity. This is managed by the Risk Management function, an integrated part of all business processes, who define and deploy the RMF.

For information on risk management by individual risk type, please see section C 'Risk Profile'.

The RMF is governed by the RMC and the annual plan for the Risk Management function is recommended for approval to the Board. The risk plan would be reviewed more regularly than annually if the Company was subject to a major change in regulatory requirements, strategy or organisational structure. The aim of the RMF is to:

- Support business objectives and strategy;
- Obtain management information to facilitate the identification and understanding of material risks including related mitigants;
- Contribute to the Company's overall internal control framework by helping to manage the inherent complexity within the business;
- Support the Company's Risk Management standing; and
- Support regulatory risk management requirements.

The RMC meets regularly and oversees the implementation and embedding of the RMF and monitoring of Company performance against risk appetite. The RMC has responsibility for overseeing the preparation of the ORSA and makes recommendations and escalates any issues to the Executive and the Board, related to risk and capital management. The RMC ensures that material and emerging risks are identified and reported and that appropriate arrangements are in place to manage and mitigate those risks effectively. The Company's stress testing framework and outputs are reviewed by the RMC and support understanding of the risk profile.

Risk Management Strategy

The risk management strategy is overseen by the Board and supports the delivery of the overall business strategy. To support the Board, the Company has an appointed Chief Risk Officer (CRO), and established a RMC to oversee more detailed risk management activity and monitoring against the Board approved risk appetites.

The risk management strategy is to ensure that risk implications, as well as reward, are considered in both setting and implementing the Company's strategic and business objectives, and risks associated with the strategic direction of the business are appropriately monitored. The strategy is articulated in the risk policies and is achieved by incorporating risk processes, information and decisions in the day to day running of the business.

The Company's strategy involves taking on risk in order to generate return. Risks are selected and controlled or traded off through the risk strategy that focuses on:

- Retaining risk within an approved risk appetite that is consistent with the Company's strategic objectives, with appropriate levels of capital with excess held by the Company;
- A diversified portfolio of underwriting and financial markets risks;
- Managing excessive aggregation risk via a limit framework;
- Exercising consistency and transparency of risk management and control across the Company;
- Risk mitigation on key underwriting and financial market risks to protect capital from the impact of extreme events; and
- Risk reporting to the RMC, the Board and other stakeholders (e.g. regulators).

Risk Appetite Framework (RAF)

The Company's RAF is a key dimension of the risk management strategy and mirrors the AXA Group RAF. The RAF distinguishes between 'Risk Appetite Statements' which apply to multiple risk types, and 'Risk Appetite Exposures' which apply to single risk types. In addition, there exists the potential for additional 'Risk Indicators' which are not explicitly specified in the scope of the RAF but are identified as required by the Company. The RAF is used to provide governance for setting new monitoring requirements, as well as reviewing and updating existing risk appetite statements, tolerances and limits, so that these are aligned with business and risk management strategies. The Company's RAF focuses on regulatory capital at risk, tolerances to risks from material individual events (e.g. natural catastrophes (NAT CAT), RDS that cross multiple lines of business etc.), liquidity standards, tolerance to specific investment related risks and operational risk.

The risk management strategy and risk appetite frameworks are supported by the following:

- **Risk Governance** - a clear and cost-effective organisational structure for risk management, including clear roles and responsibilities. The Company operates a 'Three Lines of Defence' governance structure, at a functional level as well as a management committee level.

- **Risk Policies & Standards** - The policies document the Company's approach to the management of each category of risk to which the Company is exposed. These policies are supported by AXA Group Standards which apply across the Division.
- **Risk definition and categorisation** - provides a common risk universe and language for risk to allow for categorisation of all risks in a way which facilitates links between the business and risk management processes.
- **Risk cycle and processes** - the approach taken to top down, bottom up, and process led - risk identification, quantification, management and control. The (non-approved) internal model is used in the risk assessment process.
- **Risk-based decision making** - The results of the ORSA and the insights gained in the ORSA process are taken into account for a range of business decisions.
- **Risk Management Information and Reporting, including ORSA Production** - ensuring timely and accurate information is reviewed in line with the governance structure.
- **Skills, Resources and Risk Culture; Organisational Learning; Change Management Governance** - All enable a mature risk culture throughout the Company.

Risk Reporting

A risk dashboard is presented on a regular basis to the RMC. The dashboard measures the status against risk appetite statements and the associated monitoring triggers and limits using the latest output from the business and Standard Formula. The dashboard includes information related to the monitoring against all of the Company's material risk categories. Highlights from the dashboard including performance against appetite and limits are reported to the Risk Committee through the CRO report.

The RMF remains appropriate for 2020.

B.3.2 Own risk and solvency assessment

The ORSA encompasses processes to identify, assess, monitor, manage and report the short to medium term risks, with the aim of assessing:

- The overall solvency needs taking into account the specific risk profile, approved risk tolerance limits and the business strategy;
- The compliance, on a continuous basis, with the capital requirements and with the requirements regarding technical provisions; and
- The significance with which the risk profile of the Company deviates from the assumptions underlying the calculated SCR

The ORSA is a tool of the risk management system, contributing to strengthen the culture of risk management, and giving a comprehensive and complete vision of the risks embedded in the Company. AXA Group has established a policy on the ORSA to describe the common framework and rules to run and report on the ORSA across the Group. The Company ORSA utilises the common framework and rules.

The Regulatory Capital Requirement is derived using the Solvency II Standard Formula profile. In addition the Standard Formula results are presented to the RMC and the Board to provide a breakdown of the risk exposures to inform and drive risk and capital based decision making.

The processes for the ORSA and production of the ORSA report are tailored to fit into the Company's organisational structures in a proportionate manner with techniques to assess the overall solvency needs and taking into consideration the nature, scale and complexity of the risks inherent to the business.

ORSA governance

All risk management and capital assessment processes form part of the ORSA. The ORSA is not a single task undertaken at one point in time, but rather it encompasses the entirety of the risk and capital management activity undertaken during the year, as described in the annually approved ORSA policy. Key tasks within that activity are reviewed and approved by the Board as part of the process (e.g. capital to support the business plan and risk appetites) and included in the Board approved ORSA report. The production of the full ORSA report is performed annually but regular management information that is produced by the ORSA processes is provided continuously during the year.

The frequency of each ORSA process mentioned above has been set to allow for appropriate identification, assessment, measurement, control and monitoring of risks to the business.

B.4. Internal control system

The 'Three Lines of Defence' approach which ensures effective and robust day to day governance is in place as described in Section B1 above.

The AXA XL Internal Control Framework defines and monitors the overall system of controls implemented within the company ensuring all controls are performed by somebody.

Internal Control Programme was introduced to implement a robust and effective Internal Control Framework by:

- Implementing a risk based approach to focus on risks that really matter;
- Promoting management accountability for controls;
- Introducing a common set of tools and techniques to be consistently used across the Group;

Improving coordination between the different control functions.

The AXA XL Internal Financial Control (IFC) team provides assurance on the financial reporting controls in place across the division. This provides reasonable assurance to entities within the Division that financial reporting is reliable and compliant with applicable laws and regulations and provides comfort over the completeness, accuracy and appropriateness of data. The IFC framework has expanded in line with the AXA framework in 2019.

The Internal Audit Function provides the 'third line of defence' where they provide independent assessment of the effectiveness of the Company's system of internal control and report to the Audit Committee.

B.4.1 Internal Controls

The IFC function is committed to promoting a robust internal financial control framework for the Audit Committee, executive management and external stakeholders to rely on for financial and regulatory reporting purposes.

The IFC's core strategic objectives include:

- Conducting an effective and efficient assessment of the design and operating effectiveness of internal controls over financial reporting;
- Identifying areas in which the inherent risk of financial misstatement is high so that management can address these risks before they manifest themselves in an actual misstatement;
- Providing executive management, the Company's Board and AXA Group reasonable assurance over AXA XL's financial reporting processes; and
- Adding value by helping management promote a robust control environment.

The IFC team performs an annual assessment of the control framework which includes: risk identification, risk assessment and planning, documenting business processes, evaluation and validation of key risks and controls, and issue management.

The Internal Control Framework looks at 22 macro processes that constitute AXA value chain for insurance business were identified. For each macro process key risks are defined and for each key risk, control objectives are defined. For each control objective, controls are designed and operated locally to efficiently meet control objective and mitigate the related key risk.

B.4.2 Compliance function

The compliance function is responsible for advising the Company's management and Board on compliance with applicable laws, regulations and administrative provisions adopted in accordance with the Solvency II Directive and other local laws and regulations, and on the impact of changes in the legal and regulatory environment applicable to XLICSE operations. Our Compliance function provides expertise, advice and support to various departments of the Company to assess situations and compliance matters, analyse compliance risk and contribute to design solutions to mitigate those risks to which XLICSE is exposed.

Since re-domiciliation to Ireland, the Head of Compliance is supported by the wider Irish Compliance team as well as members of the Legal & Compliance team based in the various branches of the Company.

XLICSEs compliance, financial crime and monitoring functions manage a wide range of compliance related matters including (i) regular reporting on significant compliance and regulatory matters to senior management and to regulators, (ii) financial crime matters (which include anti-corruption, anti-bribery, anti-money laundering programs as well as international sanctions/embargo compliance), (iii) data privacy, (iv) employee Compliance & Ethics Guide, (v) the monitoring of compliance and regulatory risks.

The Company's compliance function undertakes an annual Compliance Risk Assessment to identify the most significant compliance risks to which the business is exposed. Based on this assessment, an Annual Compliance Plan is developed at the end of each year for the following year.

The compliance activities within XLICSE are articulated around a number of AXA Group Standards and Policies which set the minimum requirements expected to be covered by XLICSE. The AXA Group Standards contain standards and policies on significant risks affecting the compliance activities as well as the high level control and monitoring principles to which XLICSE must adhere. Both the standards and policies contained in the AXA Group Standards (e.g. Compliance Governance, Anti-Money Laundering, Sanctions, Anti-Bribery) are mandatory. In addition, the compliance function has adapted the Group requirements and developed local policies to align with the relevant laws and regulations in the jurisdiction in which AXA XL operates and conducts business.

The Company's compliance function reports directly to the Board on significant compliance matters. These include major regulatory changes that have compliance implications, results of the Compliance Risk Assessment, the Annual Compliance Plan, remediation plans and any other significant issues that require escalation.

The function is a critical contributor to the safe and sound operation of the Company and underpins the achievement of its strategy and business goals.

B.5. Internal audit function

The Head of Internal Audit for the Company reports to the AXA XL Chief Audit Executive and has a direct and unfettered reporting line directly to his/her respective Audit Committee Chairman. The Chief Audit Executive for AXA XL functionally reports through to the AXA Group Head of Audit who reports to the AXA Group Audit Committee Chairman.

Internal Audit exists to help the Board and Executive Management protect the assets, reputation and sustainability of the organisation by providing an independent and objective assurance activity designed to add value and improve the organisation's operations. It helps the organisation meet its objectives by bringing a systematic, disciplined approach to challenge executive management and evaluate the effectiveness of risk management, control and governance processes.

The internal audit function has an audit charter to document its mission, independence, scope, accountabilities, responsibilities, authorities and standards. The charter is approved by the Company's Audit Committee each year.

Internal Audit annually sets up an internal audit plan of work, based on an assessment of both the inherent risk and the adequacy of controls. Its performance is formally monitored and reported to the Audit Committee.

Over the audit cycle, all applicable Common Audit Universe categories for each entity are expected to be audited. Any exceptions identified are notified to the Audit Committee for ratification.

A report is issued at the conclusion of each audit assignment to the relevant senior management. The results of the audits and resolution status of internal audit issues are presented to the Audit Committee and executive management on a regular basis.

B.6. Actuarial Function

B.6.1 Roles and Structure

An Actuarial Function has been set up locally with a specific objective to adhere to the requirements of Solvency II, as well as the local Domestic Actuarial Regime and associated guidelines. This includes issuing of opinions on the overall underwriting policy, the reliability and adequacy of the calculation of technical provisions and the adequacy of reinsurance arrangements. The Actuarial Function prepare an Actuarial Function report to inform the management and the Board on its conclusions about the reliability and adequacy of the calculation of technical provisions.

The responsibilities of the Actuarial Function are shared by a number of key individuals who are supported by their respective teams. These teams are of sufficient size, and consist of suitably qualified and experienced people that meet the Company's minimum fitness and proper employment criteria. The teams are structured with varying lines of defence to facilitate effective peer review and independent challenge.

B6.2 Reports of the Actuarial Function to the Board and Regulators

The Board delegates responsibilities to the Actuarial Function. The Actuarial Function in turn provides expert actuarial advice to the Board through formal reports and presentations to the Board.

The Actuarial Function documents all material tasks that have been undertaken and include the disclosure of key results and the evaluation of any deficiencies and recommendations for addressing any such deficiencies.

The Board receives analyses of quarterly reserve movements.

B6.3 Actuarial Function Responsibilities

The Actuarial Function is involved in many of the key processes across the Company's business and provides technical expertise and assurance over the methods used. The key processes are:

- Estimating the gross and net technical provisions;
- Ensuring the appropriateness of the methodologies and underlying models used as well as the assumptions made in the calculation of technical provisions and explaining any material effect of change of data, methodologies or assumptions between valuation dates on the amount of technical provisions;
- Assessing the sufficiency and quality of the data used in the calculation of technical provisions and where relevant providing recommendations on internal procedures to improve data quality;
- Informing the Board on the reliability and adequacy of the calculation of technical provisions; overseeing the calculation of technical provisions;
- Assisting in the execution of the risk management framework and ensuring effective governance framework around the review and validation of loss reserves (including technical provisions), policyholder obligations and potential exposures, which includes:
 - i. Regular contact by reserving actuaries with underwriting and claims teams;
 - ii. Review of technical provision results by an escalating series of reviews from reserving actuaries to the Division Actuarial Function Holder;
 - iii. Review of technical provisions to provide sufficient independence from management;

- iv. Independent external analysis of the reserving requirements; and
- Setting and maintaining actuarial standards to be applied across the business, ensuring that the actuarial methods and techniques are compliant with all the appropriate Division and local regulatory requirements;
- Providing, at least annually, an opinion on underwriting policy and overall reinsurance arrangements;
- Assisting with the underwriting process, including those surrounding pricing and design of underwriting contracts and risk transfer mechanisms;
- Helping to maintain a competent, effective and efficient approach to pricing; and
- Comparing best estimates against experience.

In addition to the Actuarial Function role, the CBI has introduced specific domestic requirements regarding the Actuarial Function and related governance arrangements which apply to all (re)insurance undertakings subject to Solvency II. Undertakings are required to notify the Central Bank of the person proposed to take responsibility for the Actuarial Function. Undertakings do this via the Central Bank Fitness & Probity regime where the position is a Pre-approved Control Function ("PCF") position, called Head of Actuarial Function (the "HoAF"), and as such, will require Central Bank pre-approval before the proposed individual can be appointed to the position.

The responsibility for the tasks called out for the Actuarial Function under Solvency II and the responsibilities introduced by virtue of the "2018 Domestic Actuarial Regime Related Governance Requirements under Solvency II" and, shall be held by one individual, i.e. the HoAF, who is suitably fit and proper to hold those responsibilities. While the operational activities to fulfil those responsibilities can be spread across a number of individuals, the Central Bank requires there to be one individual with overall responsibility for ensuring compliance with the relevant requirements and answerable to the Board, in that regard. That individual shall have the prerequisite level of experience commensurate with the requirements of the role and the sophistication of the methodologies and techniques appropriately employed by the undertaking. The HoAF shall be a member of a recognised actuarial association, for example one that is a member of the Actuarial Association of Europe. Where an undertaking is designated as a High Impact undertaking, the HoAF shall be an employee of the undertaking. The term "employee" means a direct employee of the undertaking or an employee provided through a group services company on a full-time basis. The Company is a high impact firm.

The undertaking shall ensure that the HoAF provides an actuarial opinion to the Central Bank on an annual basis. Responsibility for the actuarial opinion rests with the HoAF, using his or her professional judgement. The opinion shall address the Technical Provisions (the "TPs") of the undertaking as reported in any annual QRT to the Central Bank with a financial reporting date on or after 30th June 2016. This shall be referred to as the Actuarial Opinion on Technical Provisions (the "AOTPs").

In addition to, and connected with the AOTPs, the undertaking shall ensure that the HoAF also provides an Actuarial Report on Technical Provisions (the "ARTPs") to the Board on an annual basis, which supports the AOTPs. This report shall also be provided to the Central Bank.

The undertaking shall ensure that the HoAF provides an actuarial opinion to the Board in respect of each ORSA process of the undertaking. The opinion will address, at a minimum and having regard to the undertaking's individual risk situation, the following:

- The range of risks and the adequacy of stress scenarios considered as part of the ORSA process.
- The appropriateness of the financial projections included within the ORSA process.
- Whether the undertaking is continuously complying with the requirements regarding the calculation of TPs and potential risks arising from the uncertainties connected to this calculation.

This opinion is provided in relation to any ORSA process conducted from 2016 onwards. The opinion will be provided to the Board at the same time as the results of the ORSA process to which it relates.

B.7. Outsourcing

Outsourcing refers to an arrangement between the Company and a service provider (intragroup or third party) by which the service provider performs a process, a service or an activity that would otherwise be undertaken by the Company.

Outsourcing can increase operational risk exposure through reduced control over people, processes and systems. In order to mitigate this, the Company has established an Outsourcing Policy which sets out the principles for management of the risks arising from its outsourced arrangements and for monitoring the performance of the service providers. The Company has established a governance framework to support the application of the Outsourcing Policy and to ensure compliance with regulatory and Solvency II requirements. This framework incorporates an Outsourcing Committee chaired by an ExCo member with representation from the key business functions. The role of the Committee is to ensure adequate controls are implemented, review key performance indicators and assess potential Outsourcing risk.

As at year end 2019, the Company had outsourced arrangements in place to cover delegated underwriting, delegated claims handling and intragroup arrangements with AXA Group companies to cover the provision of employees and services, investment management and IT infrastructure. Where AXA Group companies decide to further outsource services (chain outsourcing), they must also ensure that they comply with the requirements of the Company's Outsourcing Policy.

The provision of employees and services to the Company is primarily through the AXA Group service company, XL Catlin Services SE (XLCSSSE), which is also headquartered and regulated in Ireland.

B.8. Any other information

The system of governance is designed to protect the long-term interests of the Company's stakeholders while promoting the highest standards of integrity, transparency and accountability.

A key ongoing objective is the integration of merged entities, governance and controls into the Company framework.

C. Risk Profile

Risk governance requires that the Company can comprehensively articulate the profile/universe of the risks over which its governance processes operate. To this end, the Company has an agreed approach to the definition and categorisation of risks.

Risk Universe

The risk universe is based on the AXA Risk Grid as follows:

- Financial risks, including market, credit, and liquidity;
- Insurance risk;
- Operational risk;
- Other risks, including emerging risks, reputational risks, and strategic & regulatory risks;
- Intangible risk (intangible assets).

As outlined in section B.3.2 the Standard Formula is used to calculate the regulatory capital requirement. The Company plans to develop an Internal Model (IM) for approval. A full breakdown of the key risk drivers of the Standard Formula SCR can be found in Section E.2.2 below.

Key risks and capital drivers

The key risks and capital drivers identified in the Standard Formula, and from the risk identification processes, are as follows:

- Underwriting risk is driven by natural catastrophes and man made perils; and
- Reserving risk: The majority of volatility arising from reserving risk is not related to a specific event but reflects the potential for many different areas of carried reserve to deteriorate at the same time.

C.1. Underwriting risk

Risk definition

Underwriting risk (Insurance risk) is defined using the following categories:

Component	Definition
Underwriting risk	The risk of loss, or adverse change in the value of insurance liabilities, due to inadequate pricing, provisioning assumptions and reinsurance schemes.
Reserve risk	Reserve risk relates to policy liabilities (corresponding to business written in prior periods where the exposure has already been earned at the opening balance sheet date) being insufficient to cover the cost of claims and associated expenses until the time horizon for the solvency assessment. Additional risks are that the timing or amount of actual claims pay outs do not align with the timing or amounts of the estimated claims pay outs and that there are changes in the valuation of the market value margin (risk margin) during the time horizon for solvency assessment.
Lapse risk	Lapse risk is the risk of loss, or of adverse change in the value of insurance future profits, resulting from changes in the level or volatility of the rates of policy lapses, terminations, renewals and surrenders. This includes policies where an assumption has been made about renewal that may not be warranted based on past experience either in terms of actual treaties or underlying policies issued and renewable.

Risk identification

Underwriting and loss experience is reviewed regularly for, among other things, loss trends, emerging exposures, changes in the regulatory or legal environment as well as the efficacy of policy terms and conditions. Underwriting risk is also identified through:

- **Business planning** - Analysis is undertaken of the underwriting portfolio, exposures, loss experience and changes to the external environment (including market cycle, economic environment) to identify any changes to the insurance risk profile for the forthcoming period of the budget / business plan;
- **Underwriting processes (including guidelines and escalation authorities)** - Each individual contract written is assessed, by the underwriting process (which is subject to granular underwriting guidelines and escalation authorities) for the nature and level of insurance risk that it brings to the business including consideration of the exposure by nature of the limit, the risks insured, the location of the risks and other underwriting criteria;
- **Reserving and claims process** - On an ongoing basis, claims trends are monitored and analysed for any indications of change in the nature of the underlying insurance risk;

- **Risk Management risk assessment process** - Through this process, the Company quantifies existing risks and also identifies new risks;
- **Modelled loss output** - Certain Company appetites have been agreed that are based upon modelled losses, which are used to monitor compliance with underwriting tolerances and limits; and
- **Independent underwriting peer reviews** - conducted on a risk based approach by the Underwriting Governance team.

Risk mitigation

Reinsurance purchase

The Company participates in AXA XL managed outwards 3rd party reinsurance risk transfer programme to support the Company's underwriting strategy within risk appetite and to ensure efficient use of capital. AXA XL work with the AXA Group Reinsurance entity (AXA Global Re) on the outwards reinsurance strategy placements. Business ceded varies by location and line of business based on a number of factors, including market conditions. The goals of the outwards reinsurance risk transfer programme include reducing exposure on individual risks, protecting against catastrophic risks, maintaining acceptable capital ratios and enabling the writing of additional business. The overall goal of the programme is to reduce volatility and enhance overall capital efficiency.

The adequacy of the AXA XL reinsurance strategy as a protection mechanism for the Company is considered and is approved by the Company Board as part of the annual business planning process, and the impact of that strategy is monitored quarterly by both the RMC and Board.

The Company also has a number of intra-Group reinsurance arrangements with XLB for 2020. The counterparty exposure to XLB is managed through a range of risk mitigation actions.

Actuarial Function

To mitigate the risk of large changes of reserves from one period to the next which are due to internal (not external) factors such as human errors, the reserving process performed by the Actuarial Function is highly structured, strictly defined and controlled, and includes several layers of oversight.

Rating adequacy

Underwriters are supported by dedicated teams of claims personnel and pricing actuaries. Premiums are set and adjusted based, in large part, on the industry group in which the insured is placed, the corresponding industry sector rating, and the perceived risk of the insured relative to the others in that group. The rating methodology used for individual insureds seeks to set premiums in accordance with claims potential. Underwriting guidelines and policy forms differ by product offering as well as by legal jurisdiction. Pricing tools are specialised and generally operate by line of business.

Underwriting authorities and guidelines

All underwriters are assigned individual underwriting authorities with the objective of preserving the capital base and controlling earnings volatility. Authorities within the business units are delegated through the underwriting management structure, and the annual review of underwriting limits is part of the business planning process. Authorities are also set in line with agreed risk appetites and risk tolerances for material individual events, RDS that cross multiple lines of business, and from risks related to some or all of the above that may occur concurrently.

The Company underwrites and prices most risks individually following a review of the exposure and in accordance with its underwriting guidelines. The Company seeks to meet its clients' needs while controlling its exposure both on a portfolio basis and on individual insurance contracts through terms and conditions, policy limits and sub-limits, attachment points and reinsurance arrangements on certain types of risks.

New product process

The Underwriting Committee provides oversight of both new and existing products written and represents the Company on any AXA XL new product approval committees or working groups. The new product process is designed to track and manage product innovation and obtain approval of new products by the Underwriting and Executive Committees.

The existing XLICSE new products process will be expanded to incorporate a number of additional features within the AXA process. This will entail the introduction of New Product Approval Process ("PAP") including a documented risk management opinion on new products.

Business Acceptance Sub-Committee

This sub-committee reports to the UC and is tasked with reviewing and ultimately, approving or declining business proposed for the Company platform. The Sub-Committee is tasked with undertaking an assessment to ensure that business presented in this forum:

- a) Is of sufficient quality and pricing;
- b) Fits with the stated risk appetite of the Company;
- c) Is complementary to the Plan approved by the Board (if a proposal results in a significant shift in the Plan then would need to inform the ExCo, the Board and regulators);

- d) Can be serviced appropriately by the Company; and
- e) Doesn't create any operational, regulatory or reputational risk.

Risk monitoring

On a quarterly basis catastrophe exposure valuations are measured against risk appetites, monitored and reported to the RMC and Board. This monitoring is both on an exposure (aggregate for CAT risk type) and per-risk basis. Realistic Disaster Scenarios (RDSs) are also produced twice a year and monitored and reported to RMC and Board. In addition Large Losses are regularly monitored at Board and Executive level.

Underwriting risk monitoring includes articulation of risk appetites per the Risk Appetite Framework (RAF), alerts and limits are specified by risk category which include P&C Reserving, P&C UW - Property, P&C UW - Liability, P&C UW - D&O, P&C UW - Marine, P&C UW - Aviation, P&C NAT CAT Event impact - Peak peril, and P&C UW - Cyber.

Stress testing framework

There is an embedded stress testing framework that is used to understand possible impacts of major risks, including underwriting and reserving risks. These impacts include the earnings, underwriting, investments, liquidity and capital implications of low frequency, high severity events. For underwriting risks the main stress test approaches used cover natural catastrophe peril exposure results production and RDS production as outlined below.

Test type	Reason performed
Nat Cat reporting	To monitor Nat Cat exposures against risk appetite
RDS reporting	To monitor non-Nat Cat exposures and to assist in the setting of overall risk limits

Natural catastrophe exposure results, and RDS exposure results, are used to monitor exposure to the defined scenarios and monitor compliance with underwriting risk tolerances and limits. RDS's are produced a minimum of twice per year to understand the Company's exposure to defined non-Nat Cat scenarios, which have been designed by experts and cover both short and long tail lines of business and cross class event exposures. The RMC (and Board) are informed of results of stress tests performed via risk dashboards and the ORSA report throughout the year where discussions and challenge include whether the results fall within relevant approved risk tolerances and limits.

C.2. Market risk

Risk definition

Market risk represents the potential for loss due to adverse changes in the fair value of financial and other instruments. The Company is principally exposed to the following market risks:

Component	Definition
Interest rate and spread risk	Financial loss or volatility of profits due to the combined sensitivity of the economic value of the investment portfolio and (re)insurance liability cash flows and debt securities issued to changes in the level or volatility of benchmark interest rates and spreads.
Market risk concentrations	Financial loss or volatility of profits due to the increased sensitivity of the market value of the investment portfolio to other risks specifically due to concentrations of investments such as in specific geographical region, industry or company.
FX risk	Financial loss due to volatility in the value of the Company's assets following changes in currency exchange rates.
Equity price risk	Financial loss or volatility of profits due to the sensitivity of the value of the investment portfolio to changes in the level or in the volatility of market prices of equities.

Additional Market risk components include;

- Real Estate
- Hedge Funds
- Dynamic Hedging Basis Risk
- Private Equity
- Inflation
- Dynamic Hedging Transaction Cost

Risk identification

The Company identifies market risk through the following processes:

Process	Description
Business planning	As part of the annual Investment Plan, a review is undertaken of the nature of assets required to support the business plan and the expected liabilities.
Investment decisions and asset allocations	Investment Plan details the planned purchases and sales of securities and their respective quantities for the year in conjunction with the Strategic Asset Allocation (SAA) benchmark and the Risk Appetite Framework limits.
Risk Management Risk assessment and stress testing processes	The risk assessment process assists in identifying if there are any changes to market risks already identified in the previous assessment.
Emerging risks	The Division operates an emerging risks identification process. This assessment identifies key external factor changes that may give rise to Market risk issues.

Market risk is also explored through underwriting and the Emerging Risk process which has Company representation. The Emerging Risk Task Force, comprised of senior leadership from across the organisation, actively monitors a wide array of emerging risks to provide the Company's underwriters, as well as clients, with pertinent information regarding new and existing trends. This involves the ongoing review of strategic and risk management processes, identifying potential opportunities in the market and providing thought leadership around emerging risk issues to optimise underwriting and strategic decisions.

Risk mitigation

The Company's investment management strategy ensures its continued compliance with the Prudent Person Principle set out in Article 132 of Directive 2009/138/EC.

Strategic Asset Allocation

The Strategic Asset Allocation (SAA) process at AXA XL Division level establishes a benchmark that is constructed to maximise enterprise value, subject to various considerations and constraints. It is subject to the risk tolerances recommended by management and is approved at least every 3 years by the Company's Board.

- **Authorities Framework / Risk Appetite Framework**

As part of the implementation of AXA XL's SAA Benchmark, a comprehensive framework of Investment Authorities are employed at AXA XL Division level. The objective of the Authorities Framework is to ensure that the risk profile of the investment portfolio is consistent with AXA XL's risk tolerance and liabilities in conjunction with the Divisional Risk Appetite Framework. The Authorities Framework controls active or tactical deviations from the SAA Benchmark. As the magnitude of these deviations increases or the resulting impact on the risk profile of the investment portfolio reaches certain predetermined thresholds, additional levels of authority and approval are required. The Company has a corresponding set of Risk Appetite Framework limits which is aligned with AXA XL Division and local constraints.

The Investment Risk Management Policy and Company Risk Appetite Framework market risk limits address the key market risk factors and are commensurate with the volume and complexity of activity undertaken by the Company.

- **Service level agreements**

Service level agreements are in place between XLGIL and the Company. These include guidance on type of investments and the average weighted credit ratings of the portfolio that can be made on behalf of the Company. Adherence to policies and limits are monitored and signed off on a regular basis and subject to monitoring and reporting to the Company's Board as described below.

Currency risk mitigation

The Company is primarily exposed to currency risk in respect of liabilities under policies of insurance denominated in currencies other than Euro. The most significant currencies to which the Company is exposed to (in terms of currency risk) are Sterling and the Australian Dollar. The Company seeks to mitigate the risk by matching the estimated foreign currency denominated liabilities with assets denominated in the same currency. Asset Liability Management (ALM) analysis is run regularly to adjust surplus and shortfall currencies, ensuring that the entity exposures are broadly matched. The table below outlines the Company's current exposure by currency:

The Company Net Asset Mix by Currency (as at December 31, 2019)

Exposure by currency	% Market Value
EUR	84%
AUD	7%
INR	5%
HKD	4%
SGD	4%
CHF	3%
Other*	(7)%
Total	100%

Other* - At the year end the Company held liabilities in excess of their assets in some underlying currencies. This has resulted in a negative market value as illustrated above.

Risk monitoring

Market Risk definition includes articulation of Risk Appetites per the Risk Appetite Framework, alerts and limits are specified by risk category and sub-category. For example for the Risk Appetite 'Exposure per asset class' the sub categories include Fixed Income, Real Estate, hedge funds, etc.

Day-to-day management of the investment portfolio is conducted through a combination of in-house portfolio management teams and external asset managers in accordance with detailed investment guidelines and risk tolerances that are closely monitored by AXA XL Investments. This hybrid implementation approach provides access to external asset managers with specialised skills across a broad range of investment products, as well as the flexibility to actively manage the overall structure of the portfolio in line with the Company's specific business needs. Interaction between the internal and external managers provides additional insight to take advantage of opportunities as they present themselves.

The delegation of investment authority to AXA XL Investments is supplemented by robust compliance monitoring with defined escalation and notification procedures. This framework is designed to identify investment risks on an absolute basis and relative to liabilities and to consistently and objectively measure, assess, manage and report such risks on an ongoing basis. The Risk Appetite Framework is cascaded down to the Company and approved by the Board. Any breaches in limits of the Risk Appetite Framework are highlighted in the risk dashboard presented to the RMC and escalated to the Board.

The Company's investment portfolio mostly contains high rated government and corporate assets as seen in the figure below. This is reported to the RMC via the risk dashboard, with any breaches in Risk Appetite highlighted to the Board.

Stress testing framework

An embedded stress testing framework is used to understand possible impacts of major risks, including market risks. The following stress and scenario tests are used to identify risk exposures:

- Interest rate and spread sensitivities: by re-valuing current portfolio holdings assuming various changes in the level and term structure of interest rates and the level of credit spreads;
- Historical stress tests identified by Risk Management and AXA XL Investments covering economic, financial and political events and the potential impact to the investment portfolio.
- RDS aggregations; and
- Ad hoc review of enterprise risk scenarios.

The Company undertakes a range of extreme events as identified above which intend to stress its capital position and also take a view at the 1 in 100, which is the point at which its market risk limit and appetite is set.

The RMC and Board, where appropriate, are informed of results of stress tests performed throughout the year including whether the results fall within relevant approved risk tolerances and limits set out in the investment guidelines. Based on the above factors considered in scenario and stress testing, all market risks are deemed to be well managed and within risk appetite, as reported via the Risk Dashboard and ORSA report to the RMC and Board.

C.3. Credit risk

Risk definition

Credit risk is defined as the risk of loss due to an unexpected default, or deterioration in the credit standing of counterparties and debtors, or uncertainty of an obligator's continued ability to make timely payments in accordance with the contractual terms of the instrument.

Credit risk through the risk framework is categorised by the following:

Component	Description
Reinsurance counterparty Risk	Risk of losses due to the default of a reinsurer or a deterioration of its credit worthiness.
Investment counterparty Risk	Counterparty default risk is the risk of possible losses due to the unexpected default, or deterioration in the credit standing of investment counterparties.
Premium counterparty Risk	Premium counterparty default risk is the risk of possible losses due to unexpected default, or deterioration in the credit standing of the premium debtors in relation to insurance contracts written.
Underwriting counterparty Risk	Exposure to credit risk through certain credit sensitive underwriting activities which include, but are not limited to, Surety, Worker's Compensation, Environmental and Political Risk and Trade Credit,

Additional Credit Risk components include:

- Mortgage

Risk identification

The Company identifies credit risk through the following processes:

Process	Description
Business planning	Analysis is undertaken of the credit risk exposures, loss experience and changes to the external environment (including market cycle and economic environment) to identify any changes to the credit risk profile for the forthcoming period of the business plan.
Underwriting	Each individual contract written is assessed, by underwriting process (which is subject to granular underwriting guidelines and escalation authorities) for the nature and level of credit risk that it brings to the business including consideration of the exposure by nature of the limit, the risks insured, the location of the risks and other underwriting criteria.
Risk Management Risk assessment and processes	Through the risk assessment processes, the Company quantifies existing risks and also identifies new risks.
Emerging risks	The Division operates an emerging risks identification process. This assessment identifies key external factor changes that may give rise to credit risk issues. The process also evaluates potential opportunities that might arise from these emerging risks.

Risk mitigation

Credit risk is managed through:

- **Credit risk framework** - Credit risk arising from credit sensitive underwriting activities is managed via the underwriting limit framework. Credit risk in the investment portfolio is managed through various frameworks applied at AXA XL and Company including Authorities & Guidelines, Fixed Income Concentration, Sovereign Risk Appetite, and Country of Risk. These address the credit quality of obligors and counterparties, diversification, exposure vs limits by rating, term and seniority, and quantitatively evaluate credit risk following a robust Credit VaR methodology. FRM Internal Credit Ratings (ICR) have been developed by taking into account the Group Credit Team (GCT) Internal Rating to decrease the dependency toward the 3 main Rating Agencies. Exposure to credit spreads primarily relates to market value and cash flow variability associated with changes to credit spreads. Credit spreads in the investment portfolio are regularly reviewed in terms of the inherent potential for downgrade of individual obligors as well as the wider impact on the overall credit risk of the portfolio.
- **Legal documentation:** Corporate functions and underwriting businesses are responsible for sound and legally enforceable documentation that should be in place for each agreement with credit risk content. Approved documentation is put in place before entering into a contractual obligation.
- **Intra-group credit arrangements** - The Company derives significant reductions in risk resulting from intra-Group reinsurance arrangements as identified in section C1.

- **Underwriting authorities and limits** - See C1 Underwriting Risk.
- **Investment portfolio** - Credit risk is also managed through the credit research performed by external investment management service providers, Group Risk Management, and the in-house portfolio management team.
- **Reinsurance Security Department** - The Company manages its credit risk in its external reinsurance relationships by transacting with reinsurers that it considers financially sound, and if necessary, collateral in the form of funds, trust accounts and/or irrevocable letters of credit may be held. The following table outlines the Company's top external reinsurance credit exposures as at 31 December 2019.

		Q4 2019	Q1 2019
Non-Life Reinsurer	Rating	% of exposure	% of exposure
Swiss Re	AA	24%	24%
Munich Re	AA	14%	19%
Everest Re	AA	5%	4%
Hannover Re	A	3%	—%
National Indemnity Company	AA	3%	6%

- **Premium payment and brokers** - The Company underwrites a significant amount of its (re)insurance business through brokers and credit and premium risk exists should any of these brokers be unable to pay premium due. A list of approved broking houses is maintained.

Risk monitoring

Credit Risk monitoring includes articulation of Risk Appetites per the Risk Appetite Framework (RAF), alerts and limits are specified by risk category, which include Fixed Income concentration, Global Issuer exposure, and Reinsurance Counterparty Risk.

Risk Management consolidates credit exposure reports from corporate functions and underwriting businesses on a regular basis for aggregating, monitoring and reporting to the RMC and Board.

Investment portfolio

On a regular basis a review is undertaken of the investment portfolio to improve the Company's understanding of asset concentrations as well as, credit quality and adherence to its credit limit guidelines. Any issuer over its credit limit or experiencing financial difficulties, material credit quality deterioration or potentially subject to forthcoming credit quality deterioration is placed on a watch list for closer monitoring. Where appropriate, exposures are reduced or prevented from increasing.

Stress testing framework

There is an embedded stress testing framework that is used to understand possible impacts of major risks, including credit risks. Stress tests and scenario analysis are undertaken to monitor exposure to the defined scenarios that allows monitoring of exposure to credit risks. These scenarios help to understand potential losses to ensure that the Company is prepared to withstand projected losses from these events, including ensuring that there is adequate capital, and liquidity to manage through the event and maintain the Company as a going concern. Based on the factors considered in scenario and stress testing, all credit risks are deemed to be well managed.

AXA S.A. Credit Facility.

The Company may benefit in part from a \$1bn multi-currency facility, which AXA S.A. entered into July 2019, with the main insurance and reinsurance carriers of AXA XL. The credit agreement allows for letters of credit to be issued in a variety of currencies.

No letters of credit have been issued to the Company.

C.4. Liquidity risk

Risk definition

Liquidity risk is defined as the inability to meet cash and collateral posting obligations when they come due. Liquidity risk arises from three principal areas: operating, financing and investing cash flows. The RMF addresses how the Company manages liquidity both under a normal and a stressed environment.

Risk identification

The Company identifies liquidity risk through the following processes:

Process	Description
Stress testing	Stressing known and forecasted liquidity positions, downgrade triggers, collateral demands and cash flows by legal entity to cover an investments capital market shock and a 1:100 Nat Cat Shock (loss) over multiple time horizons (ranging from 1 week to 12 months).
Treasury	Treasury has responsibility to identify and monitor concentration risk of cash at banks, along with funding requirements.
Risk Management Risk assessment and processes	Through the risk assessment processes, the Company quantifies existing risks and also identifies new risks.

Risk mitigation

One of the principal objectives of liquidity risk management is to ensure that there is readily available access to funds with which to settle large or multiple unforeseen claims. It is generally expected that positive cash flow from operations (underwriting activities and investment income) will be sufficient to cover cash outflows under most future loss scenarios.

Cash requirements include all possible claims on cash from policyholders, shareholders and operations. Some of these cash outflows are scheduled while others are known with much less certainty. The goal is to ensure sufficient liquidity in the asset portfolio, together with secured external cash sources, to provide for timely payment of potential cash demands under both normal business conditions and under extreme conditions resulting from unforeseen events over a 12 month horizon.

Liquidity risk is managed through:

- **Investment Portfolio Liquidity** - It is required that the legal entity hold sufficient unencumbered liquidity resources to be able to withstand a major natural catastrophe and capital markets shock along with stressed operating cashflows without the need for additional assets. This test is performed quarterly and focuses on four distinct time horizons: one week, one month, three months and one year.
- **Asset-Liability Management** - See section C.6 for further details of the ALM framework.
- **Special funding clauses** - The major source of liquidity risk within underwriting contracts is the provision of rating triggers, which are common practice. These triggers typically necessitate the cancellation of the policy and the return of the cedant's unearned premium in the event of being downgraded below a certain rating level, which has the potential to be a material liquidity event when aggregated. There are controls in place to ensure that there is appropriate authorisation for the inclusion of a downgrade clause in a contract.

Risk monitoring

The Treasury department serves as the focal point for liquidity monitoring, drawing on the expertise of other internal functions, as well as managing cash held at bank accounts covering day-to-day cash requirements, typically referred to as operating cash. Operating cash balances, together with cash managed within the investments portfolio, comprise the primary sources of liquidity with the Company.

Risk appetite is captured through risk reporting to the RMC and Board and monitored as part of the RAF.

Risk appetite links directly to the stress testing framework outlined below.

Stress testing framework

There is an embedded stress testing framework that is used to understand possible impacts of major risks, including liquidity risks. A stressed liquidity analysis report is prepared on a quarterly basis by Treasury, which includes the Company's own view of the stressed sources and uses of liquidity over multiple time horizons (ranging from 1 week to 12 months).

Based on the above factors considered in scenario and stress testing, all liquidity risks are deemed to be well managed and within risk appetite, as reported via the Risk Dashboard and ORSA report to the RMC and Board.

Expected profit in future premium

The expected profit in future premium at 31 December 2019 and 2018 was €411m and €458m respectively.

C.5. Operational risk

Risk definition

The Company defines operational risk as the risk of loss, resulting from inadequate or failed internal controls and / or processes, or from people and systems, or from external events. Operational risks are defined consistent with the Basel II risk categorisation. In line with business objectives, the Company does not take on operational risk with a view to achieving enhanced return. Rather, it accepts operational risk as a consequence of writing (re)insurance business and having operations to support the writing of that business.

Risk identification

Operational risk is identified through the following processes:

Process	Description
Annual risk assessment	A risk register is maintained of the material operational risks faced by the Company. On an annual basis an assessment is performed on the risks on the risk register.
Consultation regarding new regulations	When the regulatory authorities announce potential changes to the regulatory environment (such as new rules and regulations) the Legal and Compliance teams are responsible for reviewing the proposed changes and for highlighting any change in regulatory risk that might arise. When new financial reporting regulations are announced, the CFO is responsible for reviewing the proposed changes and for highlighting any change in regulatory risk that might arise.
Business planning	Any changes to the operational risk environment that arise as a result of the business planning (such as entry into new territories) must be identified and accounted for during the planning process.
Ongoing operations	Function heads and Risk Owners are responsible for identifying any new (or changed) risks during the normal course of business, and notifying the Policy owners and risk owners so any required changes to the risk register can be implemented.
Emerging risks	The Company operates a Division wide emerging risks identification process which captures emerging risks. This assessment identifies key external factor changes that may give rise to operational risk issues.
Internal loss data	The Company collects data relating to operational risk losses and near misses on a quarterly basis. The data collected is used, among other things, to track incidents, identify key risk indicators and to validate and challenge operational risk quantification.
External loss data	The Company purchases historical loss data from an external provider. Large events from this database are used to identify new emerging risks.

Risk mitigation and monitoring

The Company's risk register takes into account the controls in place that mitigate specific risks. The nature of the controls and the strength of control exercised are based upon the:

- Potential severity of the risk;
- Frequency of the risk occurring;
- Cost of implementing controls relative to the significance of the risk; and
- Appetite and tolerance for the risk.

An annual assessment is performed for all risks on the risk register. The assessment involves capturing the risk owner view of the potential severity should an incident occur relating to the risk, and the likelihood of such an incident occurring. Together this establishes the profile of each risk, allowing identification of top risks, thereby facilitating appropriate risk based monitoring.

Purchase of insurance

It is recognised that while the Company may buy insurance with the aim of reducing the monetary impact of certain operational risk events (e.g. physical damage), non-monetary impacts may remain (including impact on the Company's reputation). This is considered in the risk assessment process and risk register.

The risks are monitored and managed through the risk framework and the operational loss event reporting process.

Risk appetite

The Operational risk appetite is established as an amount of financial impact to individual risks with an alert and limit set up.

Stress testing framework

To support the identification and quantification of operational risks within the business, the Company has a stress and scenario testing framework.

The operational scenarios are developed from the top risks assessed during the annual risk assessment process on a net assessment basis. The scenarios have multiple uses including:

- To monitor against tolerances; and
- To better understand economic and reputational impact of the identified top operational risk exposures.

C.6. Other material risks

Asset liability mismatch risk

Risk definition

Asset liability mismatch risk arises directly from a mismatch between assets and liabilities due to changes in market and credit risks, liquidity and FX and also arises from events affecting both asset and liability values.

In particular, two market risks influence both assets and liabilities and are hence key drivers of risk:

Component	Definition
Interest rate and spread risk and asset composition risk	Mismatches between asset composition and maturities and the profile of liability cash flows creates economic risks from changes in benchmark interest rates, spreads and asset values. This is due to changes in the nominal Mark-to-Market (MTM) value of assets not exactly offsetting changes in the nominal economic value (net-present value) of liability cash flows.
Inflation risk	Differences in the inflation sensitivity of investments, liability and debt cash flows creates a risk to unexpected changes in different types of inflation (Consumer Price Index, wage, etc.). This is due to changes in the real Mark-to-Market value of assets not offsetting changes in the real economic value (net-present value) of liability cash flows.

FX risk is also a key consideration under asset liability mismatch risk which was outlined in Section C2 Market Risk. FX risk arises from mismatches in the currency denomination of assets relative to that of financial liabilities.

Risk identification

The following outlines the processes used to identify asset liability mismatch risk:

Process	Description
Business planning	As part of the annual strategic planning process, a review is undertaken of the nature (quality, duration, currency and liquidity) of assets required to support the business plan and the expected liabilities.
Investment decisions and asset allocation	The Investment Portfolio Guidelines, Authorities and Monitoring Framework sets ranges for tactical deviation from the benchmark and is reviewed annually in conjunction with the SAA process as outlined in C2 Market Risk.
Risk Management risk assessment and processes	The risk assessment processes assists in identifying if there are any changes to ALM risks from those that had been identified in the previous risk assessment.

Risk treatment

The Company controls asset liability mismatch risk through:

- **Asset Liability Management analysis**

The Company will conduct detailed ALM analyses to match the average duration and currency of its liabilities with appropriate assets. The SAA process which it follows determines the target allocation that maximises the value of the Company subject to risk tolerance and other constraints. The SAA takes into account management's risk tolerance, liability cash flows, business plan, liquidity considerations, capital market forecasts and regulatory considerations. The ALM/SAA process is centralized at the AXA XL Division level and then target allocations are propagated down to the legal entity level further taking into account local considerations. This is typically performed annually and is mandatory to be completed at least once in every three years.

- **Investment authorities and guidelines**

Board approved market risk authority and guidelines are in place that addresses all the key market risk factors and is commensurate with the volume and complexity of activity undertaken by the Company.

- **Reserving process controls**

Among the key drivers of the Company's reserve risks are inflation, correlation across lines of business, legislative and regulatory changes, loss trend movements, timing and reporting changes at underlying ceding companies, and the excess nature of exposures in certain lines including non-proportional reinsurance.

Strategic risk

A strategic risk is the risk that a negative impact (current or prospective) on earnings or capital, material at the Divisional level, arises from a lack of responsiveness to industry changes or adverse business decisions regarding:

- Significant changes in footprint, including through mergers and acquisitions;
- Product offering and client segmentation;
- Distribution model (channel mix including alliances/partnerships, multi-access and digital distribution).

Given the nature of strategic risks, there is no capital charge assessment but rather a strong strategic RMF in place in order to assess, anticipate and mitigate these risks.

Reputational Risk

Reputation risk is the risk that an event will negatively influence the stakeholders' perceptions of the company. AXA XL maintains a Reputational Risk Framework which encompasses a set of planned actions and policies established, while reputation problems are still latent, to reduce the probability and/or the expected costs of latent reputation problems becoming actual.

Emerging Risks

Emerging risks are risks which may develop or which already exist that are difficult to quantify and may have a high loss potential. To assess the impact of emerging risks at AXA XL, the Emerging Risks Committee as well as Emerging Risks Task Force are tasked with identifying, analysing, prioritising, quantifying, monitoring and reporting on emerging risks that could have an impact on our existing and future product offerings and business operations. The Emerging Risks Committee and Task Force work together to undertake both strategic and risk management processes, assisting in identifying potential opportunities in the market and providing thought leadership around emerging risk issues to optimise underwriting and strategic decisions. The views and findings of the emerging risks team are included in the Risk Dashboard reported to the RMC.

Climate Change

As part of AXA, and AXA XL Division, the Company benefits from being part of widely supported climate change initiatives. Since becoming part of AXA, and aligning with AXA strategy, the AXA XL Division and entities within the Division, have adopted AXA's Corporate Social Responsibility Policy. As a result, business written has been adjusted to account for an underwriting approach that restricts coverage for risks relating to Coal and Oil-sands related assets, and arctic drilling.

Climate risks is a key area of risk consideration. There is a cross functional working group which includes Company representation, that meets on a regular basis to discuss climate risk and the associated action plans. Activities within the working group have included development of stress tests around climate risks.

Climate risks are considered in the context of:

- Physical risks: These are the first-order risks which arise from weather-related events, such as floods and storms. They comprise impacts directly resulting from such events, such as damage to property, and those that may arise indirectly through subsequent events, such as disruption of global supply chains or resource scarcity.
- Transition risks: These financial risks which could arise from the transition to a lower-carbon economy. This can include the potential impacts on the liability side resulting from reductions in insurance premiums in carbon-intensive sectors such as motor.
- Liability risks: These are risks that could arise from parties who have suffered loss and damage from climate change, and then seek to recover losses from others who they believe may have been responsible. Where such claims are successful, those parties against whom the claims are made may seek to pass on some or all the cost to insurance firms under third-party liability contracts such as professional indemnity (PI) or directors' and officers' (D&O) insurance.

To understand these risks within the Division, a number of workshops have been held with the underwriters, a review of wordings was undertaken and an analysis of prior claims events performed, as well as a review of external data. The Company have used these to identify a set of "candidate stress tests". Furthermore, our operational resilience work considers the potential impact of climate change in terms of its impact on our office locations.

C.7. Any other information

Since December 2019, a significant number of cases of pneumonia associated with the Coronavirus, now called Covid-2019 by the World Health Organization ("WHO"), has been reported in the province of Hubei in the People's Republic of China. This virus has now spread worldwide.

Although it is in the early stages of claims notifications, XLICSE is closely monitoring exposures to the Covid-2019 outbreak, including (i) the operational impact on its business, (ii) the consequences from a deterioration in macroeconomic conditions and a slowdown in the flow of people, goods and services, especially on new business volumes, (iii) exposure through its underwriting which is primarily anticipated to come through its crisis management, property, A&H and Credit books of business, and (iv) change in asset prices and financial conditions (including interest rates).

XLICSE has historically considered pandemic exposure within its risk assessments and these are being examined against the events of Covid-2019.

An Incident Management Team is in operation in order to oversee the operational response to Covid-2019.

D. Valuation for Solvency Purposes

This section contains information regarding the valuation of balance sheet items for solvency purposes. The Solvency II Balance Sheet S.02.01.02 is shown in the Public QRT section at the end of this report.

A reconciliation between the Irish GAAP balance sheet and the Solvency II balance sheet is presented below.

A reconciliation between the Irish GAAP equity and Solvency II equity is provided in Section E1.2. Eligible Own Funds below.

Each material asset class is described in paragraph D.1. Valuation of technical provisions is described in paragraph D.2. Other liabilities are described in paragraph D.3

		2019		2018	
	Reference	Irish GAAP Value	Adjustment	Solvency II Value	Solvency II Value
		€'000	€'000	€'000	€'000
Assets					
Deferred Acquisition Costs (DAC)	1	400,159	(400,159)	—	—
Deferred tax asset	2	39,746	(14,298)	25,448	3,609
Property, plant and equipment	3	335	39,528	39,863	70
Investments (excl participations)	4	5,993,943	880,184	6,874,127	1,723,043
Participations	5	115,468	112,895	228,363	28,881
Reinsurance recoverables	6	9,104,070	(1,261,253)	7,842,817	4,310,648
Deposits to cedants	7	104,676	(3,368)	101,308	165
Insurance and intermediaries receivables	8	2,225,654	(1,460,896)	764,758	154,063
Reinsurance receivables	9	1,103,607	(366,464)	737,143	339,028
Receivables (trade, not insurance)	10	458,008	(99,880)	358,128	343,115
Cash and cash equivalents	11	382,626	50,493	433,119	99,001
Any other assets, not elsewhere shown	12	100,110	156,003	256,113	25,486
Total assets		20,028,402	(2,367,215)	17,661,187	7,027,109
Liabilities					
Technical provisions (best estimates) - Non life & health similar to non life	13	14,612,644	(2,992,456)	11,620,188	5,241,187
Technical provisions (risk margin) - Non life & health similar to non life	13	—	465,081	465,081	122,163
Technical provisions (best estimates) - Life & health similar to life	14	—	68,634	68,634	—
Technical provisions (risk margin) - Life & health similar to life	15	—	5,175	5,175	—
Pension benefit obligations	16	10,119	1,805	11,924	2,324
Deposits from reinsurers	17	52,621	—	52,621	—
Deferred tax liabilities	18	38,406	181,270	219,676	27,803
Debts owed to credit institutions	19	—	367,489	367,489	98,560
Financial liabilities other than debts owed to credit institutions	20	—	421,610	421,610	—
Insurance & intermediaries payables	21	314,090	(14,131)	299,959	9,123
Reinsurance payables	22	1,705,954	(709,893)	996,061	393,334
Payables (trade, not insurance)	23	694,086	(259,412)	434,674	237,236
Subordinated liabilities	24	53,586	—	53,586	53,247
Any other liabilities, not elsewhere shown	25	440,889	(277,758)	163,131	20,173
Total liabilities		17,922,395	(2,742,586)	15,179,809	6,204,369
Excess of assets over liabilities		2,106,007	375,371	2,481,378	822,740

D.1. Assets

This section describes the bases, methods and main assumptions used in the valuation for solvency purposes of each material class of assets. The material quantitative differences between the value of assets in the 31 December 2019 balance sheets presented in Section D above are explained. The numbering of the balance sheet line items refers to the comments below. Based on the differences in this template a reconciliation is prepared to reflect the difference between the Irish GAAP equity and Solvency II equity.

The Solvency II Balance Sheet requires an economic (fair) valuation for all assets and other liabilities. On this basis, the following hierarchy of high level principles for the valuation of all assets and other liabilities is used:

- I. Undertakings must use quoted market prices in active markets for the same assets or liabilities as the default valuation method, notwithstanding if the applicable GAAP would allow a different approach. An active market is one in which transactions for assets or liabilities occur with sufficient frequency and volume to provide pricing information on an ongoing basis;
- II. Where the use of quoted market prices for the same assets or liabilities is not possible, quoted market prices in active markets for similar assets and liabilities with adjustments to reflect differences shall be used;
- III. If there are no quoted market prices in active markets available, undertakings should use mark-to-model techniques, which is any alternative valuation technique that has to be benchmarked, extrapolated or otherwise calculated as far as possible from a market input;
- IV. Undertakings have to make maximum use of relevant observable inputs and market inputs and rely as little as possible on undertaking-specific inputs, minimising the use of unobservable inputs;
- V. When valuing liabilities using fair value, an adjustment is required to remove the own credit risk of the liability.
- VI. The Company uses a fair value hierarchy for its investment portfolio that prioritises inputs to its valuation techniques which are used to measure fair value. The hierarchy gives the highest priority to unadjusted quoted prices in active markets for identical assets, 6% of the total portfolio, and then quoted prices in markets that are not active or inputs that are observable either directly or indirectly (92% of the total portfolio). The equity accounting method is used for the Affiliates holdings, 2% of the total portfolio.

The differences between the Irish GAAP and Solvency II valuation for assets are set out below:

1. Deferred acquisition costs (DAC) are costs relating to the acquisition of new business for insurance contracts. Under Irish GAAP these costs are deferred to the extent that they are expected to be recovered out of future margins in revenues on these contracts. Recognition of DAC is not permitted under Solvency II;
2. Under Solvency II the valuation of deferred tax assets is determined by the differences between the economic valuation of an asset or liability on the Solvency II balance sheet and its tax base. A deferred tax asset can only be recognized to the extent it is probable that future taxable profit will be available against which the unused tax losses and unused tax credits can be utilized. The criteria for holding a deferred tax asset is similar under Irish GAAP and Solvency II and a review under both basis of accounting has been performed.
3. Property, plant and equipment is held at cost less any depreciation and impairment loss under Irish GAAP. This valuation is a proxy for fair value under Solvency II.
4. The reason for the differences between Solvency II and Irish GAAP for investments is that some assets are carried at cost under Irish GAAP compared to fair value under Solvency II. Accrued investment income is included within the value of the investment under Solvency II, whereas it is disclosed separately in the Irish GAAP balance sheet. In addition, certain cash instruments in the Irish GAAP balance sheet are classified as investments under Solvency II.
5. Participations are equivalent to Associates in the Irish GAAP balance sheet and are accounted for under the adjusted equity method under both Irish GAAP and Solvency II. The adjusted equity method is a method of accounting whereby the investment is initially recognized at cost and adjusted thereafter for the post-acquisition change in the investor's share of the investee's net assets, which for Solvency II is calculated on an economic basis;
6. See Section D2.2 for a discussion of reinsurance recoveries under Irish GAAP compared to Solvency II;
7. Deposits to cedants under Irish GAAP are measured at cost less provision for impairment and are not discounted. Cost less provision for impairment is a reasonable proxy for fair value for the Solvency II measurement given the short term nature of these assets.
8. Insurance and intermediaries receivables under Irish GAAP are measured at cost less provision for impairment and are not discounted. The valuation differs to Solvency II due to the fact that all of the not-yet-due insurance and intermediaries receivables are transferred to technical provisions under Solvency II (See Section D2 for details). As

this is simply a balance sheet reclassification between assets and liabilities there is no material impact on equity (apart from the fact that receivables not-yet-due are discounted within technical provisions). Only the due receivables remain in assets under Solvency II and are measured at cost less provision for impairment as a reasonable proxy for fair value given the short term nature of these assets.

9. Reinsurance receivables under Irish GAAP are measured at cost less provision for impairment and are not discounted. The Solvency II adjustment represents assumed premium debtors which are offset against technical provisions under Solvency II. Therefore there is no impact on equity for this adjustment. Cost less provision for impairment is a reasonable proxy for fair value for the Solvency II measurement given the short term nature of these assets.
10. Trade receivables under Irish GAAP are measured at cost less provision for impairment and are not discounted. There is no change in valuation under Solvency II as cost less provision for impairment is a reasonable proxy for fair value for the Solvency II measurement given the short term nature of these assets.
11. Cash and cash equivalents are measured at fair value under both Irish GAAP and Solvency II. The difference in cash valuation is because any bank accounts in an overdraft position are moved to debts owed to credit institutions. In addition, certain cash instruments in the Irish GAAP balance sheet are classified as investments under Solvency II.
12. Other assets are measured at cost less provision for impairment under Irish GAAP, which is a reasonable proxy for fair value under Solvency II given the short term nature of the assets. The difference is due to the fact that under Solvency II accrued investment income is included within the value of the investment; whereas it is disclosed within Other assets in the Irish GAAP section of the Balance Sheet.

D.2. Technical provisions

Items 6 and 12 from the Solvency II Balance Sheet in Section D above are combined below to present Net Technical Provisions:

		Solvency II Value	
		2019	2018
		€'000	€'000
Technical provisions (best estimates) - Non life & health similar to non life	13	11,620,188	5,241,187
Technical provisions (risk margin) - Non life & health similar to non life	13	465,081	122,163
Gross technical provisions		12,085,269	5,363,350
Reinsurance recoverables	6	7,842,817	4,310,648
Net technical provisions		4,242,452	1,052,702

Regarding D.2.1 Valuation Bases, Assumptions and Methods to Derive the Value of Technical Provisions

Technical provisions are valued based on best estimate cash flows, adjusted to reflect the time value of money using risk-free discount rate term structures. In addition, there is a risk margin to reflect the uncertainty inherent in the underlying cash flows which is calculated using the cost of capital approach and risk-free discount rate term structures. The discount rate term structures are prescribed by EIOPA for each reporting period.

The best estimate for the claims provision is calculated by using GAAP reserves as the starting point and then performing a series of adjustments:

- Incorporation of expected reinsurance counterparty defaults (bad debt);
- Incorporation or the identification of events not in data (ENID) as appropriate;
- Future premiums (payables and receivables);
- Other adjustments related to the consideration of investment and operating expenses, etc.; and
- Discounting credit.
- Removal of prudence margins (as GAAP reserves are established on a best estimate basis) .

The best estimate for the premium provision is calculated by using the gross unearned premium reserve on a GAAP basis, and then performing a series of adjustments:

- Gross and ceded premiums on already obliged but yet to incept business;
- Applying expected future gross loss ratios;
- Reinsurance recoveries (less bad debt);
- Future Losses Occurring During (LOD) reinsurance cost covering existing incepted policies;
- Incorporation or the identification of ENID as appropriate;
- Future premiums (payables and receivables);
- Other adjustments related to the consideration of investment and operating expenses, etc.;
- Adjustments for lapses as appropriate;
- Discounting credit.

In the valuation of the (re)insurance obligations within the technical provisions, the Company has not applied any of the following adjustments to the EIOPA risk-free interest rate term structure:

- matching adjustments (referred to in Article 77b of Directive 2009/138/EC);
- transitional risk-free interest rate term structure (referred to in Article 308c of Directive 2009/138/EC); and
- transitional deductions (referred to in Article 308d of Directive 2009/138/EC).

At 31 December 2019, the total net technical provisions amounted to €4,242,452m (2018: €1,053m) comprising the following:

	2019	2018
	€'000	€'000
Claims Provision	4,414,848	868,467
Premium Provision	(637,477)	62,072
Risk Margin	465,081	122,163
Total Technical Provisions	4,242,452	1,052,702

The following tables show the breakdown of total net technical provisions as at 31 December 2019, for each material line of business:

2019

Solvency II Lines of Business	Best Estimate	Risk Margin	Total Technical Provisions	Percentage of Total
	€'000	€'000	€'000	%
General liability	1,946,158	221,065	2,167,223	51%
Fire and other damage to property	1,046,640	112,972	1,159,612	27%
Other	784,573	131,044	915,617	22%
Total	3,777,371	465,081	4,242,452	100%

2018

Solvency II Lines of Business	Best Estimate	Risk Margin	Total Technical Provisions	Percentage of Total
	€'000	€'000	€'000	%
General liability	358,812	65,096	423,908	40%
Fire and other damage to property	230,399	27,785	258,184	25%
Other	341,328	29,282	370,610	35%
Total	930,539	122,163	1,052,702	100%

The General Liability business makes up approximately 51% (2018: 39%) of the Company's net technical provisions because of the long-tail nature of potential liabilities. The main methods and assumptions used to calculate the General Liability technical provisions are consistent with those used on all the other lines of business, although the underlying parameters are specific to each line of business. For example, there is a higher discounting credit on the General Liability business relative to the other lines of business due to longer settlement durations.

The methods and assumptions are described above.

D2.2. Description of Recoverables from Reinsurance Contracts

The reinsurance recoverables for the claims provisions are sourced directly from the GAAP submissions.

Within the premium provisions, the estimated ceded recoveries are calculated by applying ceded-to-gross ratios reflecting the reinsurance programmes applicable to the gross claims amounts.

Principle of Correspondence

Under the principle of correspondence, the technical provisions allow for the renewal cost of future Losses Occurring During reinsurance programmes insofar as they would benefit already incepted policies. For unaccepted business, future reinsurance cost is explicitly allowed for, and its associative benefit is recognised within the ceded recoveries.

Reinsurance counterparty risk is the risk that ceded recoverables cannot be collected. To cover this risk a reinsurance bad debt (RIBD) allowance is created. This RIBD allowance is calculated based on the credit rating for each reinsurer over the lifetime of the liabilities.

D2.3. Uncertainty / limitations associated with the value of the technical provisions

General As with all insurance business, there is inherently a degree of uncertainty over the exact amount that will be needed to settle the future liabilities. In addition to the inherent uncertainty regarding claims outcomes, there are a number of potential specific sources which contribute to further increasing this uncertainty. There is also additional uncertainty relating to the operating environment due to the acquisition of the XL Group by AXA, and the consequent focus on integration activities. It should be noted that these potential specific sources of uncertainty are monitored and discussed regularly in risk committees, management committees and / or reserve committees and actions taken as appropriate.

Eurozone uncertainty following the UK's vote to leave the EU during June 2016 is expected to result in increased uncertainty in the Eurozone. This is expected to increase the volatility of settling insurance claims for several years. This will stem from potential quantitative easing in the EU but is likely to then knock on to other areas of the market (e.g. wages may ultimately also be affected). Nonetheless, it is possible that the additional financial impacts could be significantly in excess of the projected claims amounts, investment income and expenses.

Ongoing economic uncertainty The Actuarial Function would also note that the current uncertainty in the financial markets has the potential to create market conditions which could lead to increased frequency of casualty losses. However, there is significant uncertainty in this regard. More widely, a global economic downturn is likely to raise the frequency and increase the uncertainty around the severity of claims generally across the insurance market.

Volume of premium underwritten There exists uncertainty as to the level of business volume being written into future projection years. This could be impacted by the premium rating environment as well as the macro-economic environment. A change in the volume underwritten will cause uncertainty in the following areas of the financial projections. A change in volumes of business underwritten may materially impact the mix of business underwritten. A significant change in the mix of business could change the projected loss ratio performance compared to that stated in the income statement. A reduction in the volume of business would mean the level of fixed expenses, relative to the premium volumes would increase. This could materially impact the combined ratios stated in the income statement. A change in the mix of business underwritten could impact the reinsurance coverage provided. If the mix of business were to materially differ it could be that the current plan for reinsurance coverage would no longer be appropriate.

Underwriting cycle During the last few years the insurance industry has been considered to be in the 'soft' part of the underwriting cycle i.e. with excess capacity in the market leading to increased competition and falling rates. Efforts have been taken to include an allowance for the insurance cycle within the financial projection, however, a material change in the underwriting cycle could materially lead to a change to the projected income statement.

Exposure to large losses or an accumulation of losses The Company has exposure to large events or accumulation of a number of smaller events. The emergence of a large loss event of this type could significantly alter the estimate of financial projections on a gross of reinsurance basis. The Company note that the reinsurance protection in place mitigates the impact on a net of reinsurance basis. Further, a very large loss across the insurance market can significantly change the underwriting environment and can have a material impact on the financial projections.

Inflationary impacts - severity An increase in the total cost of settling individual claims could materially impact the future claims cost for future projection periods.

Frequency trends An increase in the frequency claims occurring could materially impact the total future claims cost for future projection periods.

Legislative changes in particular jurisdictions A change to the legislative environment could impact the severity and frequency of losses which could have the potential to materially impact the total future claims cost for future projection periods.

Reinsurance coverage A change in the reinsurance coverage purchased could lead to a material deviation from the estimates stated in the financial projections. For example, an increase in the level of reinsurance coverage purchased could lead to an increase in the combined ratio but, in turn, may lead to a reduction in the SCR.

Underwriting strategies A change in AXA XL's underwriting strategy could materially change the results in the financial projections. This could materially impact the claims loss ratios and hence the combined ratio stated in the income statements.

D.3. Other liabilities

The following table details the value of each material class of other liabilities under both Irish GAAP and Solvency II at 31 December 2019 and comparatives for 2018.

Other liabilities	Reference	2019		2018	
		Irish GAAP	Adjustment	Solvency II	Solvency II
		Value €'000	€'000	Value €'000	Value €'000
Pension benefit obligations	16	10,119	1,805	11,924	2,324
Deposits from reinsurers	17	52,621	—	52,621	—
Deferred tax liabilities	18	38,406	181,270	219,676	27,803
Debts owed to credit institutions	19	—	367,489	367,489	98,560
Financial liabilities other than debts owed to credit institutions	20	—	421,610	421,610	—
Insurance & intermediaries payables	21	314,090	(14,131)	299,959	9,123
Reinsurance payables	22	1,705,954	(709,893)	996,061	393,334
Payables (trade, not insurance)	23	694,086	(259,412)	434,674	237,236
Subordinated liabilities	24	53,586	—	53,586	53,247
Any other liabilities, not elsewhere shown	25	440,888	(277,756)	163,132	20,173
Total other liabilities		3,309,750	(287,009)	3,020,732	841,800

Details on the material differences between the bases, methods and main assumptions between Irish GAAP and Solvency II valuation for liabilities are set out below:

- Under both Irish GAAP and Solvency II the pension benefit obligations are measured as the excess of the projected benefit obligation over the plan assets. This is considered a reasonable proxy for fair value, particularly given the immateriality of the liability.

- 17 Deposits from cedants are held at amortized cost under both Irish GAAP and Solvency II. This is deemed a reasonable proxy for fair value given the short term nature of these liabilities.
- 18 Under Solvency II the valuation of deferred tax liabilities is determined by the differences between the economic valuation of an asset or liability on the Solvency II balance sheet and its tax base. The deferred tax liability valuation has changed given the differences between the tax base of the Solvency II balance sheet and the tax base of the Irish GAAP balance sheet.
- 19 Debts owed to credit institutions represent the reclassification of overdrafts from cash and cash equivalents when moving from Irish GAAP to Solvency II. They are measured at fair value under both Irish GAAP and Solvency II.
- 20 Financial liabilities other than debts owed to credit institutions are measured at fair value under both Irish GAAP and Solvency II.
- 21 Insurance and intermediaries payables are measured at amortized cost under Irish GAAP and are not discounted. The difference under Solvency II is a result of a balance sheet reclassification to move a debit balance to Insurance receivables.
- 22 Reinsurance payables are held at amortized cost under Irish GAAP. All of these amounts that are due to be paid at a future date have been transferred to technical provisions under Solvency II and therefore there is no impact on Own Funds for this adjustment (apart from an immaterial amount due to the discounting of reinsurance premium payables within technical provisions).
- 23 Payables (trade, not insurance) are held at amortized cost under both Irish GAAP and Solvency II. This is deemed a reasonable proxy for fair value given the short term nature of these liabilities.
- 24 Subordinated liabilities comprise a \$60m (2018:\$60m) USD loan explained in Section E1.2 Eligible own Funds.
- 25 Any other liabilities, not elsewhere shown include ceded unearned commissions. This income is deferred under Irish GAAP but written off as it is not permitted under Solvency II.

D.4. Alternative methods for valuation

Approximately 6% (2018: 6%) of investments (excluding participations) are valued using the unadjusted quoted price in an active market for identical assets or liabilities that the Company can access at the measurement date. All remaining investments are valued using inputs that management consider to be Level 2. Level 2 inputs include: quoted prices for similar (but not identical) assets; quoted prices in markets that are not active; or other inputs that are observable or can be derived principally from or corroborated by observable market data for substantially the full term of the assets.

With respect to investments, it is common industry practice to use pricing services as a source for determining fair values where the pricing services are able to obtain sufficient market-corroborating information to allow them to produce a valuation at a reporting date. In the vast majority of valuations, the pricing services use market approaches to valuations using primarily Level 2 inputs. For a small percentage of fixed income securities, the pricing services may use some form of discounted cash flow analysis. Standard inputs to the valuations provided by the pricing services listed in approximate order of priority for use when available include: reported trades, benchmark yields, broker/dealer quotes, issuer spreads, two-sided markets, benchmark securities, bids, offers, and reference data.

Given the nature of the Company's debt security portfolio, management considers the approach to provide an appropriate measure of fair value, with limited valuation uncertainty.

The Company performs regular reviews of the prices received from third party valuation sources to assess whether the prices represent a reasonable estimate of the fair value. This process is completed by investment and accounting personnel who are independent of those responsible for obtaining the valuations. The approaches the Company take include, but are not limited to, annual reviews of the controls of the external parties responsible for sourcing valuations that are subjected to automated tolerance checks, quarterly reviews of the valuation sources and dates, and comparison of executed sales prices to prior valuations.

There are no other material assets or liabilities which are valued using alternative methods of valuation.

D.5. Any other information

There is no other material information regarding the valuation of assets and liabilities for Solvency II.

E. Capital Management

E.1. Own Funds

This section provides a view of the capital management activities of the Company, its capital management methods and the structure, amount and quality of its own funds. Under Solvency II, capital is referred to as Own Funds. Own Funds are calculated from the excess of assets over liabilities in the Solvency II balance sheet, to which any subordinated debt is then added. This combined amount is known as Basic Own Funds. Total Own Funds may include Ancillary Own Funds which are off-balance-sheet items that can be called up to absorb losses. The Company has €500m of Ancillary Own Funds. Own Funds are classified into tiers and restrictions are applied to limit the extent to which the various components of Own Funds can be used to meet the capital requirements.

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. The Own Funds should be of sufficient quality to meet the eligibility requirements in Article 82 of the Delegated Regulation. The Company allocates capital efficiently to achieve sustainable returns and facilitate growth, and strive to maintain capital levels that are consistent with the Company's risk appetite, corporate strategy and statutory requirements.

The Company monitors its Own Funds and the Solvency Ratio at least quarterly and the Board receives a regular assessment of the capital position. In addition a dashboard of capital triggers is monitored to identify any instances which would require a recalculation of the standard formula capital requirement. The Committees which review solvency are described in more detail in Section B1 General Information on the System of Governance, and responsibility ultimately rests with the Board. As part of own funds management, the Company prepares ongoing solvency projections and reviews the structure of its own funds and future requirements. The business plan, which forms the base for the ORSA, contains a three year projection of funding requirements and this helps focus actions for future funding.

E.1.2 Eligible Own Funds

The starting point to determine Eligible Own Funds is to prepare the Company balance sheet on a Solvency II basis. The Solvency II balance sheet is derived from the Irish GAAP balance sheet by making the adjustments necessary to reflect the Solvency II valuation basis of assets and liabilities. This Solvency II balance sheet then provides the Basic Own Funds which are categorized into the three Solvency II tiers. There are restrictions on the amount of Tier 2 and Tier 3 capital which can be used to meet the SCR, as well as the MCR.

The difference between the net assets of the Company in the financial statements and the solvency valuation of the excess of the assets over liabilities is set out below. The adjustments are documented in section D covering valuation of assets and liabilities.

	2019	2018
Difference between equity shown in the financial statements and net assets per Solvency II	€000's	€000's
Shareholder equity per financial statements	2,159,594	860,590
Adjustments for technical provision and risk margin under Solvency II	72,376	3,943
Adjustments for DAC	(400,159)	(307,712)
Deferred Tax Adjustment	—	(5,878)
Fair value uplift of investments	618,203	—
Other adjustments	31,964	271,797
Net assets per Solvency II	2,481,978	822,740

An additional analysis is performed to determine the eligibility of these Own Funds to meet the SCR. Own Funds of subsidiaries are assessed to identify any elements which are not fungible (i.e. cannot cover losses), not transferable or not liquid (within 9 months), and hence not available for the Company.

Tiering of Basic Own Funds

At 31 December 2019 the Company's Basic Own Funds were assigned to the Solvency II tiers as shown in the following table:

2019	Tier 1 - unrestricted €'000	Tier 2 €'000	Tier 3	Total €'000
Ordinary share capital	314,969	—	—	314,969
Share premium	274,187	—	—	274,187
Net Deferred Tax Asset	—	—	25,448	25,448
Reconciliation reserve	1,866,773	—	—	1,866,773
Subordinated liabilities	—	53,586	—	53,586
Ancillary own fund	—	500,000	—	500,000
Total basic own funds after deductions	2,455,929	553,586	25,448	3,034,963

2018	Tier 1 - unrestricted €'000	Tier 2 €'000	Total €'000
Ordinary share capital	259,157	—	259,157
Reconciliation reserve	563,583	—	563,583
Subordinated liabilities	—	52,466	52,466
Total basic own funds after deductions	822,740	52,466	875,206

The Company's ordinary share capital and reconciliation reserve are all available as tier 1 unrestricted Own Funds as per Article 69 (a) (i) of the Delegated Regulation. The ordinary share capital is not subordinated and has no restricted duration. There is no intention to increase share capital in the foreseeable future. There are no foreseeable dividends or own shares held. The reconciliation reserve of €1,866m (2018:€564m) comprises net assets from the Solvency II balance sheet of €2,481m (2018:€822m) less ordinary share capital of €589m (2018:€259m). The increase in share capital was due to a share issuance in connection with the merger with AXA ART and increase in share premium. The change in valuation of the reconciliation reserve is driven by capital contributions of €90m received during the year and the change in net assets on the Solvency II balance sheet.

The Company has the following subordinated loan note at 31 December 2019 and 2018 respectively :

	Interest Rate	2019 €'000	2018 €'000
US\$60m fixed rate note due 2028	2.70%	53,586	52,466

The above subordinated loan note, taken up in 2013, is repayable at the option of the Company after a period of five years has elapsed, i.e. in 2018. The subordinated loan note is not secured and is categorised as Tier 2 Capital. There is no plan to repay the note during 2020, or to increase the amount. The change in value is driven entirely by fluctuations in the USD/ EUR exchange rate.

The Company has had no defaults of principal, interest or other breaches with respect to their subordinated loan note during the period.

The Company received a capital commitment deed from XLB to provide €500m of capital should it be needed. The Company received an approval from the Central Bank of Ireland on 6 December 2019 to be able to recognize this as a Tier 2 Ancillary Own Fund item.

The Company also has a Capital Maintenance Agreement of €400m (2018:€400m) which is not classified as Eligible Own Funds under Solvency II rules, but is a potential source of additional capital to the Company from the Group.

Eligible Own Funds to cover the SCR and MCR

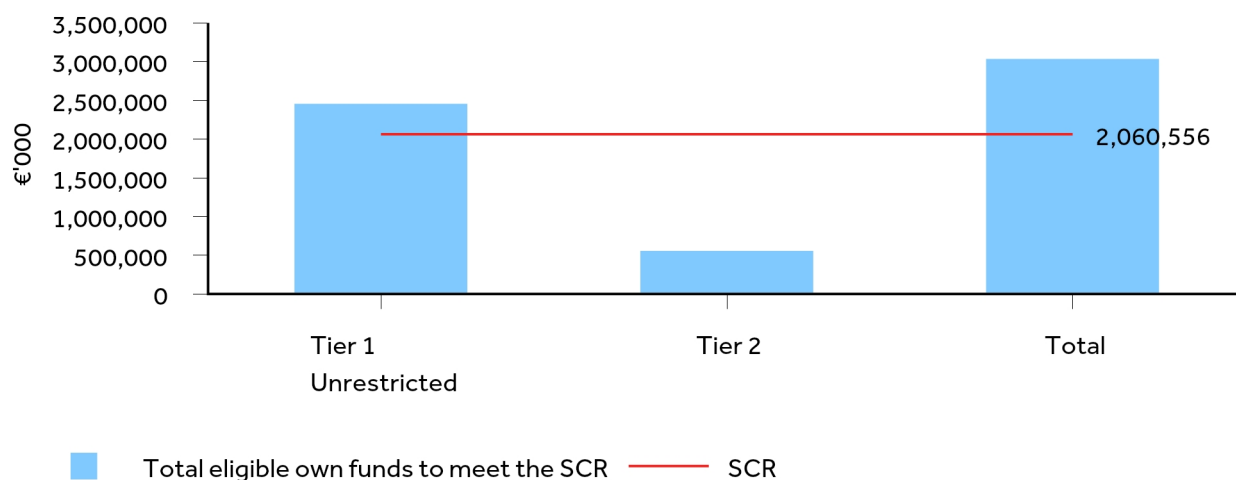
The classification into tiers is relevant to the determination of eligible Own Funds. These are the Own Funds that are eligible for covering the SCR and the MCR.

Eligible Own Funds to meet the Standard Formula SCR and MCR at 31 December 2019 and 2018 is detailed below:

2019	Tier 1 - unrestricted €'000	Tier 2 €'000	Tier 3 €'000	Total €'000
Total eligible own funds to meet the SCR	2,455,930	553,586	25,448	3,034,964
Total eligible own funds to meet the MCR	2,455,930	53,586	0	2,509,515

2018	Tier 1 - unrestricted €'000	Tier 2 €'000	Total €'000
Total eligible own funds to meet the SCR	822,740	52,466	875,206
Total eligible own funds to meet the MCR	822,740	38,344	861,084

Eligible Own Funds to meet the SCR



The SCR is set at a level to ensure that insurers can meet their obligations to policy holders over the following 12 months with a 99.5% probability, giving reasonable assurance to policyholders that payments will be made as they fall due.

The table below shows the ratio of eligible Own Funds that the Company holds to cover the SCR and MCR at 31 December 2019 and 2018 :

	2019 €'000	2018 €'000
SCR	2,060,556	713,745
MCR	646,474	191,720
Total eligible own funds to meet the SCR	3,034,964	875,206
Total eligible own funds to meet the MCR	2,509,515	861,084
	%	%
Ratio of Eligible own funds to SCR	147.3%	122.6%
Ratio of Eligible own funds to MCR	388.2%	449.1%

E.2. Solvency Capital Requirement and Minimum Capital Requirement

E.2.1 SCR and MCR results

The SCR is the amount of Own Funds that the Company is required to hold in line with the Solvency II Directive. The Standard Formula SCR calculation is calibrated to ensure that all quantifiable risks are taken into account.

The SCR and MCR under the Standard Formula at 31 December 2019 and 2018 are set out below:

	2019	2018
	€'000	€'000
SCR	2,060,556	713,745
MCR	646,474	191,720

The Standard Formula process is owned by the Finance function and involves a cooperative cross-functional effort across the organization, with input from Risk, Finance, Actuarial, Underwriting, Underwriting Capital Management, Investments and other relevant stakeholders. The results are subject to various levels of review, including by Senior Management.

The Standard Formula MCR is calculated based on the same data sources used to produce the Standard Formula SCR.

	MCR	
	2019	2018
	€'000	€'000
Linear MCR	646,474	191,720
SCR	2,060,556	713,745
MCR cap	927,250	321,185
MCR floor	515,139	178,436
Combined MCR	646,474	191,720
Absolute floor of the MCR	3,700	3,700
Minimum Capital Requirement	646,474	191,720

The non-life linear MCR is based on factors applied to net written premiums amounts in the previous 12 months and the net best estimate technical provisions both split by Solvency II Class of business. The charge for premium and technical provision elements are then summed to create a total charge.

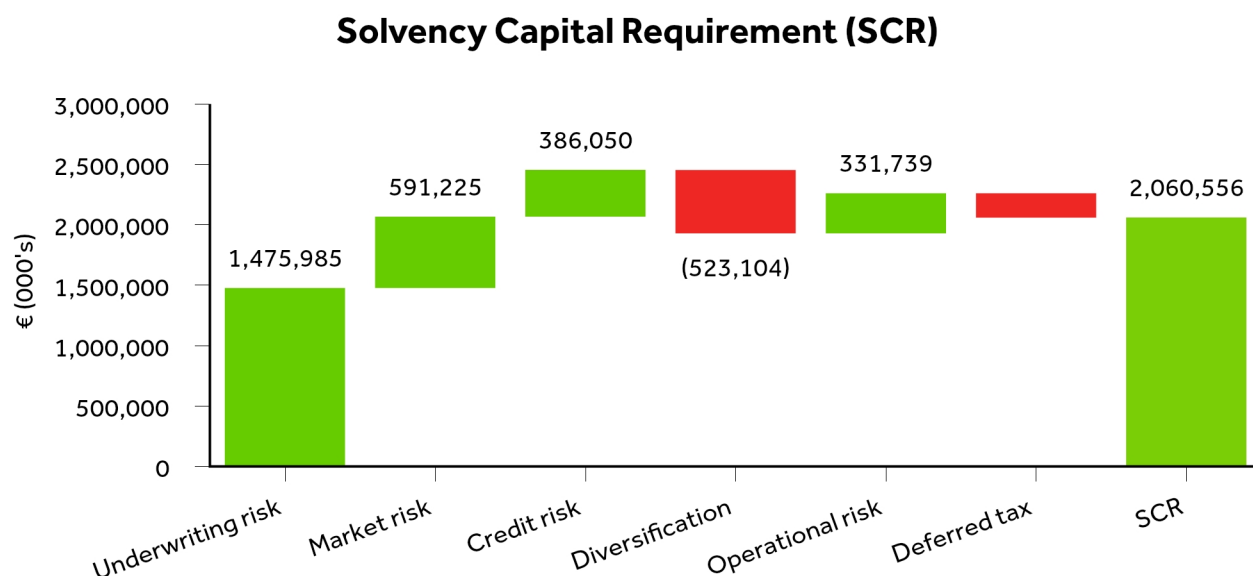
The following table illustrates the inputs to the MCR calculation for 2019 and 2018.

	Net (of reinsurance) best estimate provisions		Net (of reinsurance) written premiums in the last 12 months	
Inputs to MCR calculation	2019	2018	2019	2018
	€'000	€'000	€'000	€'000
Motor vehicle liability insurance and proportional reinsurance	217,896	—	113,186	—
Other motor insurance and proportional reinsurance	102,097	—	72,058	—
Income Protection	—	3,322	37,253	5,945
Marine, aviation and transport insurance and proportional reinsurance	562,109	81,755	433,679	66,923
Fire and other damage to property insurance and proportional reinsurance	805,615	230,399	981,292	190,923
General liability insurance and proportional reinsurance	1,847,666	358,813	388,979	293,610
Credit and suretyship insurance and proportional reinsurance	—	—	49,356	32,052
Miscellaneous financial loss insurance and proportional reinsurance	321,977	260,826	37,790	27,072
Non-proportional health reinsurance	—	25	59	47
Non-proportional casualty reinsurance	16,784	2,465	—	1,031
Non-proportional marine, aviation and transport reinsurance	708	195	1,576	31
Non-proportional property reinsurance	18,471	15,795	84,378	15,978

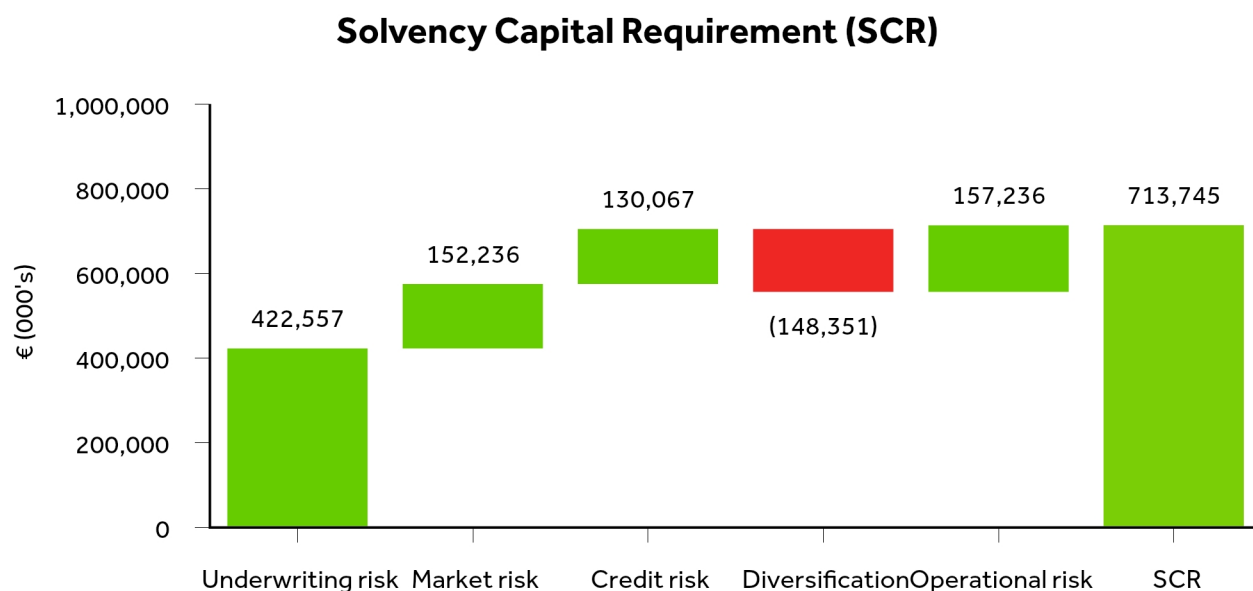
E.2.2 SCR by risk module

The Standard Formula SCR by risk module is set out below:

2019



2018



The Company has only used simplified calculations in applying the standard formula module for Counterparty default risk (Credit risk).

There has been no use of Undertaking Specific Parameters in the underwriting risk calculations.

Non-life underwriting risk (incl. Health)

The Company is exposed to non-life underwriting risk as a result of the policies it sells. The increase in premium and reserve risk is driven by the merging of ACS and ART into the Company, thus there is an increase in next year planned as well increased reserves from combining the balance sheets. The increase in Catastrophe risk is also a result of the merger.

	2019	2018
Non-life underwriting risk (incl. Health)	€000's	€000's
Non-life premium and reserve risk	1,184,036	335,734
Non-life lapse risk	80	27,297
Non-life catastrophe risk	596,412	174,049
Diversification within non - life underwriting risk module	(327,691)	(121,180)
Health underwriting risk	18,485	6,657
Non Life Underwriting Risk (incl. Health) Total	1,471,322	422,557

Market risk

The Company is exposed to market risk derived predominately from the assets held by the Company to meet its insurance liabilities.

- €156m (2018:€72m) of currency risk mainly driven by the exposure of the Company's assets and liabilities denominated in foreign currencies. The increase is a result of the inclusion of ACS and ART.
- €227m (2018:€70m) of spread risk mainly driven by the Company's investments in bonds and securitised assets. The increase is driven by the inclusion of ACS and ART.
- €187m (2017:€43m) of equity risk due to Subsidiaries and investments in listed and unlisted equities. The increase is a result of the inclusion of ACS and ART.
- €63m (2018:€50m) of interest rate risk driven by the changes in assets and liabilities of the Company due to changes in discount rates. The decrease is driven by a decrease in the value of net reserves.
- €175m (2018: €0m) of property risk reflects investments absorbed by the Company in the merger with ACS, with this being primarily in real estate funds.

	2019	2018
Market Risk	€000's	€000's
Interest rate risk	62,798	49,799
Equity risk	187,086	35,797
Spread risk	227,413	70,231
Property risk	175,064	—
Concentration risk	17,176	3,572
Currency risk	155,942	71,569
Diversification within market risk module	(234,255)	(78,731)
Total Market Risk	591,224	152,237

Operational risk

The capital requirement for operational risk is the standard measure of 3% of gross best estimate liabilities.

	2019	2018
Operational risk	€000's	€000's
Non-life gross technical provisions (excluding risk margin)	11,057,975	5,241,187
Capital requirement for operational risk based on technical provisions	331,739	157,236

Counterparty default risk (Credit risk)

The Company is exposed to €386m (2018: €130m) of counterparty risks in the form of cash deposits and recoveries from reinsurers (type 1) and from receivables from intermediaries, policyholders and other debtors (type 2). This has increased as a result of the inclusion of ACS and ART.

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

The Company is not using the duration-based equity risk sub-module. This is not applicable to the Company as it does not provide retirement benefits.

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

This section is not applicable to the Company as it does not use an approved internal model.

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

The Company met all of the SCR and MCR compliance requirements during the year.

E.6. Any other information

XL Insurance Company SEs' solvency ratio calculated without applying the volatility adjustment amounted to 147.2% at December 31, 2019 compared to 147.3% with volatility adjustment.

The basic own funds without considering the volatility adjustment would decrease by €19 million to €3,035 million, reflecting the increase in best estimate liabilities due to lower discount rate.

The total SCR would increase by €4 million mainly due to higher non-life reserve risk as a result of the movement in Best Estimate. The Minimum Capital Requirement would increase by €1 million.

There is no other material information regarding capital management.

Public Quantitative Reporting Templates

S02.01.01 Basic information

Undertaking name	XL Insurance Company SE
Undertaking identification code	LEI/635400PTQW4DT3C4DG08
Type of code of undertaking	LEI
Type of undertaking	3 – Non–Life undertakings
Country of authorisation	IE
Language of reporting	English
Reporting submission date	7/4/2020
Reporting reference date	12/31/2019
Currency used for reporting	EUR
Accounting standards	UK GAAP
Method of Calculation of the SCR	1 – Standard formula
Use of undertaking specific parameters	2 - Don't use undertaking specific parameters
Ring-fenced funds	2 - Not reporting activity by RFF
Matching adjustment	2 - No use of matching adjustment
Volatility adjustment	1 - Use of volatility adjustment
Transitional measure on the risk-free interest rate	2 - No use of transitional measure on the risk-free interest rate
Transitional measure on technical provisions	2 - No use of transitional measure on technical provisions

S.02.01.02 Balance Sheet

		Solvency II value	
		2019	2018
		€'000	€'000
Assets			
Intangible assets	R0030	—	—
Deferred tax assets	R0040	25,448	3,609
Pension benefit surplus	R0050	—	—
Property, plant & equipment held for own use	R0060	39,863	70
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	6,931,702	1,751,925
Property (other than for own use)	R0080	—	—
Holdings in related undertakings, including participations	R0090	228,363	28,881
Equities	R0100	228,162	—
Equities - listed	R0110	227,243	—
Equities - unlisted	R0120	918	—
Bonds	R0130	4,875,478	1,613,737
Government Bonds	R0140	2,771,727	703,766
Corporate Bonds	R0150	1,973,204	774,874
Structured notes	R0160	—	—
Collateralised securities	R0170	130,547	135,097
Collective Investments Undertakings	R0180	1,598,051	109,306
Derivatives	R0190	1,649	—
Deposits other than cash equivalents	R0200	—	—
Other investments	R0210	—	—
Assets held for index-linked and unit-linked contracts	R0220	—	—
Loans and mortgages	R0230	170,788	—
Loans on policies	R0240	—	—
Loans and mortgages to individuals	R0250	—	—
Other loans and mortgages	R0260	170,788	—
Reinsurance recoverables from:	R0270	7,842,817	4,310,648
Non-life and health similar to non-life	R0280	7,842,817	4,310,648
Non-life excluding health	R0290	7,804,204	4,301,244
Health similar to non-life	R0300	38,613	9,404
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	101,308	165
Insurance and intermediaries receivables	R0360	764,758	154,063
Reinsurance receivables	R0370	737,143	339,028
Receivables (trade, not insurance)	R0380	358,128	343,115
Own shares (held directly)	R0390	—	—
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	—	—
Cash and cash equivalents	R0410	433,119	99,001
Any other assets, not elsewhere shown	R0420	256,113	25,485
Total assets	R0500	17,661,187	7,027,109

		Solvency II value	
		€'000	€'000
Liabilities			
Technical provisions – non-life	R0510	12,085,269	5,363,350
Technical provisions – non-life (excluding health)	R0520	12,049,018	5,350,379
TP calculated as a whole	R0530	—	—
Best Estimate	R0540	11,585,333	5,228,437
Risk margin	R0550	463,686	121,942
Technical provisions - health (similar to non-life)	R0560	36,250	12,972
TP calculated as a whole	R0570	—	—
Best Estimate	R0580	34,855	12,750
Risk margin	R0590	1,395	221
Technical provisions - life (excluding index-linked and unit-linked)	R0600	73,809	—
Technical provisions - health (similar to life)	R0610	—	—
TP calculated as a whole	R0620	—	—
Best Estimate	R0630	—	—
Risk margin	R0640	—	—
Technical provisions – life (excluding health and index-linked and unit-linked)	R0650	73,809	—
TP calculated as a whole	R0660	—	—
Best Estimate	R0670	68,634	—
Risk margin	R0680	5,175	—
Technical provisions – index-linked and unit-linked	R0690	—	—
TP calculated as a whole	R0700	—	—
Best Estimate	R0710	—	—
Risk margin	R0720	—	—
Contingent liabilities	R0740	—	—
Provisions other than technical provisions	R0750	1,181	—
Pension benefit obligations	R0760	11,924	2,324
Deposits from reinsurers	R0770	52,621	—
Deferred tax liabilities	R0780	219,676	27,803
Derivatives	R0790	2,009	—
Debts owed to credit institutions	R0800	367,489	98,560
Financial liabilities other than debts owed to credit institutions	R0810	421,610	—
Insurance & intermediaries payables	R0820	299,959	9,123
Reinsurance payables	R0830	996,061	393,334
Payables (trade, not insurance)	R0840	434,674	237,236
Subordinated liabilities	R0850	53,586	52,466
Subordinated liabilities not in BOF	R0860	—	—
Subordinated liabilities in BOF	R0870	53,586	52,466
Any other liabilities, not elsewhere shown	R0880	159,943	20,173
Total liabilities	R0900	15,179,808	6,204,369
Excess of assets over liabilities	R1000	2,481,378	822,740

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

		Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)						Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)	Line of business for: accepted non- proportional reinsurance				Total
		Income protection insurance	Motor Vehicle liability insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyshi p insurance	Miscellaneous financial loss	Health	Casualt y	Marine, aviation, transport	Property	€'000
		€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000
Premiums written													
Gross - Direct Business	R0110	67,413	3,599	163,691	1,271,695	485,787	230,140	36,284					2,258,609
Gross - Proportional reinsurance accepted	R0120	5,347		57,814	461,267	75,789	20,092	(1,536)					618,773
Gross - Non-proportional reinsurance accepted	R0130								59	2,246	2,306	58,951	63,562
Reinsurers' share	R0140	35,507	2,220	165,056	1,304,409	416,516	200,877	34,837		10,468	(4)	2,107	2,169,890
Net	R0200	37,253	1,379	56,449	428,553	145,060	49,356	(89)	59	(8,222)	1,576	56,844	768,218
Premiums earned													
Gross - Direct Business	R0210	42,279	3,599	162,548	1,237,827	482,867	97,169	35,463					2,061,752
Gross - Proportional reinsurance accepted	R0220	4,896	(3)	59,924	482,745	68,157	15,072	7,392					638,183
Gross - Non-proportional reinsurance accepted	R0230								56	3,639	1,863	43,716	49,274
Reinsurers' share	R0240	31,225	3,662	166,911	1,330,849	430,508	95,082	34,456		8,910	355	2,379	2,104,337
Net	R0300	15,950	(67)	55,560	389,723	120,516	17,159	8,399	56	(5,272)	1,508	41,337	644,872
Claims incurred													
Gross - Direct Business	R0310	25,905	2,357	109,797	889,389	749,028	32,663	542,554					2,351,693
Gross - Proportional reinsurance accepted	R0320	2,914	68	55,593	259,905	65,137	5,018	17,730					406,365
Gross - Non-proportional reinsurance accepted	R0330								(1)	1,589	1,175	50,114	52,877
Reinsurers' share	R0340	22,755	2,299	126,839	898,153	701,004	37,889	529,676		13,471	113	2,424	2,334,623
Net	R0400	6,064	126	38,552	251,141	113,161	(209)	30,608	(1)	(11,882)	1,063	47,690	476,312
Expenses incurred	R0550	19,929	168	34,209	209,312	33,659	8,319	6,097	9	(261)	533	10,101	322,075
Other expenses	R1200												3,190
Total expenses	R1300												325,265

S.05.02.01 Premiums, claims and expenses by country

		Home Country	Top 5 countries (by amount of gross premiums written) - non-life obligations					Total Top 5 and home country
	R0010	IE	AUSTRALIA	GERMANY	FRANCE	ITALY	NETHERLANDS	
		€'000	€'000	€'000	€'000	€'000	€'000	€'000
Premiums written								
Gross - Direct Business	R0110	495,954	304,153	379,091	266,383	140,784	162,766	1,749,131
Gross - Proportional reinsurance accepted	R0120	42,357	19,752	38,988	23,934	6,564	3,558	135,153
Reinsurers' share	R0140	418,416	222,944	297,562	214,424	106,953	115,800	1,376,099
Net	R0200	137,551	100,961	64,369	75,894	35,119	41,859	455,753
Premiums earned								
Gross - Direct Business	R0210	236,851	230,161	385,149	251,882	139,591	153,768	1,397,402
Gross - Proportional reinsurance accepted	R0220	21,457	17,717	36,922	24,539	7,230	3,719	111,584
Reinsurers' share	R0240	199,726	191,680	301,292	203,149	105,884	109,183	1,110,914
Net	R0300	58,582	56,198	59,947	40,506	40,937	48,304	304,474
Claims incurred								
Gross - Direct Business	R0310	418,746	194,031	322,303	320,194	121,441	101,309	1,478,024
Gross - Proportional reinsurance accepted	R0320	49,321	9,563	19,949	13,034	4,571	1,885	98,323
Gross - Non-proportional reinsurance accepted	R0330	—	—	—	—	—	—	—
Reinsurers' share	R0340	383,916	165,700	268,884	242,224	94,523	69,542	1,224,789
Net	R0400	84,151	57,670	73,368	56,407	31,489	33,652	336,737
Expenses incurred	R0550	34,677	15,978	43,821	44,483	21,276	15,462	175,697
Other expenses	R1200							2,471
Total expenses	R1300							178,169

S.12.01.02 Life and Health SLT Technical Provisions

		Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Total (Life other than health insurance, incl. Unit-Linked)
Technical provisions calculated as a whole	R0010		
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole	R0020		
Technical provisions calculated as a sum of BE and RM			
Best Estimate			
Gross Best Estimate	R0030	68,634	68,634
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0080		
Best estimate minus recoverables from reinsurance/SPV and Finite Re - total	R0090	68,634	68,634
Risk Margin	R0100	5,175	5,175
Amount of the transitional on Technical Provisions			
Technical Provisions calculated as a whole	R0110		
Best estimate	R0120		
Risk margin	R0130		
Technical provisions - total	R0200	73,808	73,808

S.17.01.02 Non-life Technical Provisions

Direct business and accepted proportional reinsurance									
		Income protection insurance	Workers' compens ation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance
Technical provisions calculated as a sum of BE and RM		€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000
Best estimate									
Premium provisions									
Gross	R0060	1,925	—	(3,988)	452	(123,149)	(103,407)	(56,260)	(101,026)
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140	12,901	—	8,924	(87)	(27,312)	76,625	120,476	22,405
Net Best Estimate of Premium Provisions	R0150	(10,976)	—	(12,912)	539	(95,837)	(180,032)	(176,737)	(123,431)
Claims provisions									
Gross	R0160	32,931	—	283,679	118,410	1,210,723	2,669,170	5,743,758	66,742
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240	25,712	—	52,871	16,852	552,778	1,683,523	3,719,355	55,303
Net Best Estimate of Claims Provisions	R0250	7,219	—	230,808	101,558	657,946	985,647	2,024,403	11,439
Total Best estimate - gross	R0260	34,856	—	279,691	118,862	1,087,574	2,565,763	5,687,498	(34,284)
Total Best estimate - net	R0270	(3,757)	—	217,896	102,097	562,109	805,615	1,847,666	(111,992)
Risk margin	R0280	1,395	—	11,194	4,757	43,529	102,691	226,261	—
Technical provisions - total	R0320	36,250	—	290,885	123,620	1,131,103	2,668,453	5,913,759	(34,284)
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	R0330	38,613	104	72,633	16,962	525,466	1,760,148	3,839,831	77,708
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	R0340	(2,363)	(104)	243,443	120,442	605,637	908,305	2,073,928	(111,992)

		Direct business and accepted proportional reinsurance	Accepted non-proportional reinsurance				Total Non-Life obligation
		Miscellaneous financial loss	Health	Casualty	Marine, aviation and transport	Property	
		€'000	€'000	€'000	€'000	€'000	€'000
Best estimate							
Premium provisions							
Gross	R0060	42,555	—	3,036	55	764	(339,043)
Total recoverable from reinsurance/ SPV and Finite Re after the	R0140	72,351	—	6,722	523	4,906	298,434
adjustment for expected losses due Net Best Estimate of Premium Provisions	R0150	(29,796)	—	(3,686)	(468)	(4,142)	(637,477)
Claims provisions							
Gross	R0160	1,769,037	—	20,659	1,312	42,812	11,959,232
Total recoverable from reinsurance/ SPV and Finite Re after the	R0240	1,417,264	—	189	136	20,401	7,544,383
adjustment for expected losses due Net Best Estimate of Claims Provisions	R0250	351,773	—	20,470	1,176	22,411	4,414,849
Total Best estimate - gross	R0260	1,811,592	—	23,694	1,367	43,576	11,620,188
Total Best estimate - net	R0270	321,977	—	16,784	708	18,269	3,777,371
Risk margin	R0280	72,506	—	948	55	1,744	465,081
Technical provisions - total	R0320	1,884,098	—	24,642	1,422	45,320	12,085,269
Recoverable from reinsurance contract/SPV and Finite Re after the	R0330	1,489,615	—	6,910	659	25,307	7,842,817
adjustment for expected losses due to technical provisions minus recoverables from reinsurance/SPV	R0340	394,483	—	17,732	763	20,013	4,242,452
and Finite Re - total							

S.19.01.21 Non-life Insurance Claims Information

Total Non-Life Business

Accident year / Underwriting
year

Gross Claims Paid (non-cumulative)

(absolute amount)

Year		Development year										
		—	1	2	3	4	5	6	7	8	9	10 & +
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110
Prior	R0100											126
N-9	R0160	254	631	417	151	82	85	67	60	24	22	
N-8	R0170	400	798	374	191	145	83	72	35	58		
N-7	R180	247	670	429	221	148	115	55	18			
N-6	R190	307	776	394	251	190	81	118				
N-5	R200	266	711	418	191	185	155					
N-4	R210	448	921	915	301	165						
N-3	R220	273	911	479	352							
N-2	R230	408	1,084	756								
N-1	R240	312	1,050									
N	R250	274										
Total												

	In Current year	Sum of years (cumulative)
	C0170	C0180
R0100	126	126
R0160	22	1,793
R0170	58	2,155
R0180	18	1,903
R0190	118	2,117
R0200	155	1,927
R0210	165	2,750
R0220	352	2,015
R0230	756	2,248
R0240	1,050	1,362
R0250	274	274
Total	3,095	18,671

Gross undiscounted Best Estimate Claims Provisions

(absolute amount)

Development year													Year end (discounted data)	
Year		—	—	—	—	—	—	—	—	—	—	10 & +		
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300		C0360
Prior	R0100											865	R0100	843
N-9	R0160	—	—	—	—	—	—	330	253	189	165		R0160	162
N-8	R0170	—	—	—	—	—	471	374	281	203			R0170	200
N-7	R0180	—	—	—	—	574	450	369	298				R0180	285
N-6	R0190	—	—	—	755	533	468	363					R0190	355
N-5	R0200	—	—	1,005	745	592	487						R0200	483
N-4	R0210	—	2,120	1,101	956	834							R0210	805
N-3	R0220	2,478	1,847	1,156	1,139								R0220	1,102
N-2	R0230	2,904	2,079	1,621									R0230	1,575
N-1	R0240	3,380	2,760										R0240	2,724
N	R0250	3,488											R0250	3,426
													T o	R0260
														<u>11,959</u>

S.23.01.01 Own funds

		Total €'000	Tier 1 - unrestricted €'000	Tier 1 - restricted €'000	Tier 2 €'000	Tier 3 €'000
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35						
Ordinary share capital (gross of own shares)	R0010	314,969	314,969		—	—
Share premium account related to ordinary share capital	R0030	274,187	274,187	—	—	—
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040	—	—	—	—	—
Subordinated mutual member accounts	R0050	—	—	—	—	—
Surplus funds	R0070	—	—	—	—	—
Preference shares	R0090	—	—	—	—	—
Share premium account related to preference shares	R0110	—	—	—	—	—
Reconciliation reserve	R0130	1,866,773	1,866,773		—	—
Subordinated liabilities	R0140	53,586		—	53,586	—
An amount equal to the value of net deferred tax assets	R0160	25,448		—	—	25,448
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180	—	—	—	—	—
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds						
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220	—	—	—	—	—
Deductions						
Deductions for participations in financial and credit institutions	R0230	—	—	—	—	—
Total basic own funds after deductions	R0290	2,534,963	2,455,929	—	53,586	25,448
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300	—	—	—	—	—
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual-type undertakings, callable on demand	R0310	—	—	—	—	—
Unpaid and uncalled preference shares callable on demand	R0320	—	—	—	—	—
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330	—	—	—	—	—
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340	500,000	—	—	500,000	—
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350	—	—	—	—	—
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360	—	—	—	—	—
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370	—	—	—	—	—
Other ancillary own funds	R0390	—	—	—	—	—
Total ancillary own funds	R0400	500,000	—	—	500,000	—
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	3,034,964	2,455,930	—	553,586	25,448
Total available own funds to meet the MCR	R0510	2,509,515	2,455,930	—	53,586	—
Total eligible own funds to meet the SCR	R0540	3,034,964	2,455,930	—	553,586	25,448
Total eligible own funds to meet the MCR	R0550	2,509,515	2,455,930	—	53,586	—
SCR	R0580	2,060,556				

MCR	R0600	646,474
Ratio of Eligible own funds to SCR	R0620	147%
Ratio of Eligible own funds to MCR	R0640	388%

€'000

Reconciliation reserve

Excess of assets over liabilities	R0700	2,481,378
Own shares (held directly and indirectly)	R0710	
Foreseeable dividends, distributions and charges	R0720	
Other basic own fund items	R0730	614,605
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	
Reconciliation reserve	R0760	1,866,773

Expected profits

Expected profits included in future premiums (EPIFP) - Life business	R0770	
Expected profits included in future premiums (EPIFP) - Non-life business	R0780	410,901
Total Expected profits included in future premiums (EPIFP)	R0790	410,901

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

		Gross solvency capital requirement €'000	USP €'000	Simplifications €'000
Market risk	R0010	591,225		—
Counterparty default risk	R0020	386,050		
Life underwriting risk	R0030	4,662	—	—
Health underwriting risk	R0040	18,485	—	
Non-life underwriting risk	R0050	1,452,838	—	—
Diversification	R0060	(523,104)		
Intangible asset risk	R0070	—		
Basic Solvency Capital Requirement	R0100	1,930,156		

Calculation of Solvency Capital Requirement

Operational risk	R0130	331,739
Loss-absorbing capacity of technical provisions	R0140	
Loss-absorbing capacity of deferred taxes	R0150	(201,339)
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	—
Solvency Capital Requirement excluding capital add-on	R0200	2,060,556
Capital add-ons already set	R0210	—
Solvency capital requirement for undertakings under consolidated method	R0220	2,060,556

Other information on SCR

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

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

Linear formula component for non-life insurance and reinsurance obligations

		€'000	
MCRNL Result	R0010	645,032	
		Net (of reinsurance/ SPV) best estimate and TP calculated as a whole €'000	Net (of reinsurance) written premiums in the last 12 months €'000
Medical expense insurance and proportional reinsurance	R0020	—	—
Income protection insurance and proportional reinsurance	R0030	—	37,253
Workers' compensation insurance and proportional reinsurance	R0040	—	—
Motor vehicle liability insurance and proportional reinsurance	R0050	217,896	113,186
Other motor insurance and proportional reinsurance	R0060	102,097	72,058
Marine, aviation and transport insurance and proportional reinsurance	R0070	562,109	433,679
Fire and other damage to property insurance and proportional reinsurance	R0080	805,615	981,292
General liability insurance and proportional reinsurance	R0090	1,847,666	388,979
Credit and suretyship insurance and proportional reinsurance	R0100	—	49,356
Legal expenses insurance and proportional reinsurance	R0110	—	—
Assistance and proportional reinsurance	R0120	—	—
Miscellaneous financial loss insurance and proportional reinsurance	R0130	321,977	37,790
Non-proportional health reinsurance	R0140	—	59
Non-proportional casualty reinsurance	R0150	16,784	—
Non-proportional marine, aviation and transport reinsurance	R0160	708	1,576
Non-proportional property reinsurance	R0170	18,471	84,378

Overall MCR calculation

		€'000
Linear MCR	R0300	646,474
SCR	R0310	2,060,556
MCR cap	R0320	927,250
MCR floor	R0330	515,139
Combined MCR	R0340	646,474
Absolute floor of the MCR	R0350	3,700
Minimum Capital Requirement	R0400	646,474

Glossary

AC	Audit Committee
ACPR	Autorité de Contrôle Prudentiel et de Résolution
AFR	Actuarial Function Report
ALM	Asset Liability Management
APAC	Asia Pacific
APSS	Actuarial Profession Standards
AXA	AXA SA
AXA XL	AXA division comprising legacy XL companies and certain existing AXA companies
BBNI	Bound But Not Incepted
BRRC	Board Risk & Reserving Committee
Board	Board of Directors
BOF	Basic Own Funds
BSCR	Basic Solvency Capital Requirement
CAT	Catastrophe
Code	Code of Conduct
Companies Act	Bermuda Companies Act 1981
Company Share	Each issued and outstanding common share, par value \$0.01 per common share of XL
COR	Combined Operating Ratio
CRO	Chief Risk Officer
DAC	Deferred Acquisition Costs
DTA	Deferred Tax Asset
DTL	Deferred Tax Liability
EMEA	Europe, Middle East and Africa
ENiD	Events not in Data
ERM	Enterprise Risk Management
Exco	Executive Committee
EUR	Euro
FCA	Financial Conduct Authority
FIC	Framework for Internal Control
FX	Foreign exchange
GAAP	Generally Accepted Accounting Principles
GN	Guidance notes
HR	Human Resources
ICM	Internal Capital Model
IIA	The Institute of Internal Auditors
Key Functions	The Company's risk management, compliance, internal audit and actuarial functions
LOD	Losses Occurring During
Merger sub	Camelot Holdings Ltd.
Merger Agreement	Agreement and Plan of Merger, dated as of March 5, 2018, by and among XL, Merger Sub and AXA
MCR	Minimum Capital Requirement
MTM	Mark to market
NAT CAT	Natural Catastrophe
OEP	Occurrence exceedance probability
ORSA	Own Risk and Solvency Report
P&C	Property and Casualty
PAP	Product Approval Process
PRA	Prudential Regulatory Authority
PWC	PriceWaterhouseCoopers

QRT	Quantitative Reporting Template
RDS	Realistic Disaster Scenario
RI	Reinsurance
RIBD	Reinsurance Bad Debt
RM	Risk Margin
RMC	Risk Monitoring Committee
RMF	Risk Management Framework
RMS	Risk Management Solutions
SAA	Strategic Asset Allocation
SCR	Solvency Capital Requirement
SF	Standard Formula
SF SFCR	Standard Formula Solvency and Financial Condition Report
SFCR	Solvency and Financial Condition Report
SII	Solvency II
S&S	Stress & Scenario
UC	Underwriting Committee
UEPR	Unearned Premium Reserve
UK&I	United Kingdom and Ireland
XL	XL Group Ltd.
XLB	XL Bermuda Ltd.
XLCICL UK	XL Catlin Insurance Company UK Limited
XLCSSE	XL Catlin Services SE
XLGIL	XL Group Investments Limited
XLICSE	XL Insurance Company SE