Codeve Insurance Company DAC

Solvency and Financial Condition Report ("SFCR") for the financial year ended 31 December 2021

Contents

Executive Summary

This Solvency and Financial Condition Report ("SFCR") has been drafted in line with articles 290 through 299 of the Commission Delegation Regulation (EU) 2015/35 of 10 October 2014.

The objective of this report is to consolidate all material and key information relating to Codeve Insurance Company DAC ("the Company" or "Codeve") over the reporting period of 1 January 2021 through 31 December 2021.

Company Background

The Company was licensed in Ireland on 12th December 2003 and is a wholly owned subsidiary of Veolia Environnement S.A. It is authorised by the Central Bank of Ireland (CBI) to carry on the business of insurance in accordance with the regulations as defined in the European Union (Insurance and Reinsurance) Regulations 2015 (S.I. 485 of 2015).

Business and Performance

The Company's financial year-end is 31 December each year. The Company earned post-tax profits of EUR 2,735,307 for the year ended 31 December 2021 (2020: EUR 2,361,404). The profits have been driven by a strong underwriting performance. During the year no dividend was paid (2020: Nil).

System of Governance

The Company is subject to the Central Bank of Ireland's Corporate Governance Code for Credit Institutions and Insurance Undertakings ("The Code"). The corporate governance principles of the Company are implemented via the following Corporate Governance Framework:

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

Outsourced Activities

Mr. Jonathan O'Reilly is responsible for the oversight of all outsourced arrangements.

Risk Profile

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

Risk	**31/12/2021**	**31/12/2020**
	Capital Charge €	**Capital Charge €**
Non-life underwriting risk	22,048,221	22,293,304
Health Underwriting Risk	2,885,494	3,569,754
Market risk	10,777,262	5,044,441
Counterparty default risk	4,485,985	6,004,533

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

Valuation for Solvency Purposes

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

Capital Management

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

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

As at 31 December 2021, the Company had eligible own funds to cover the SCR of €46,697,740 (2020: €47,651,665) on a Solvency II valuation basis. This compares to an SCR of €31,896,248 (2020: €29,833,610) and indicates an SCR cover ratio of 146% (2020: 160%). The MCR cover ratio is 582% (2020: 639%).

A BUSINESS and PERFORMANCE

A.1 Business

A.1.1 Name and legal form of the undertaking

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

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

The Company is regulated by the Central Bank of Ireland (CBI). The CBI can be contacted at:

Central Bank of Ireland, PO BOX 559, New Wapping Street, North Wall Quay, Dublin 1, Ireland.

A.1.3 External auditor of the undertaking

The independent auditors of the Company are:

KPMG, Chartered Accountants, 1 Harbourmaster Place, IFSC, Dublin 1, D01 F6F5 Ireland

A.1.4 Holders of Qualifying Holdings in the Undertaking

Veolia Environnement S.A., a French transnational company, is a global leader in environmental services offering a complete range of water, waste and energy management solutions.

A.1.5 Legal Structure of the Group

Veolia Environnement S.A. is also the ultimate parent company.

A.1.6 Material lines of business and geographical areas

Codeve Insurance Company DAC is licensed to write the following classes of business

- Class 1: Accident
- Class 3: Land Vehicles
- Class 4: Railway Rolling Stock
- Class 7: Goods in Transit
- Class 8: Fire and Natural Forces
- Class 9: Other Damage to Property
- Class 10: Motor Vehicle Liability
- Class 13: General Liability
- Class 16: Miscellaneous Financial Loss

The material geographical area in which the Company operates are EU/EEA (France, UK, Ireland) and Non-EU/EEA (USA).

A.1.7 Significant Business events during the reporting period

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

A.2 Underwriting Performance

Year ending 31 December 2021 (all in €)					
Gross Premium Written	**Direct Property**	**Direct Liability**	**Health**	**Reinsurance Accepted**	**Total**
Risks Located in Ireland	-	228,168	-	9,720	237,888
Risks located in other EU countries	30,438,781	37,113	556,263	3,903,682	34,935,839
Risks located outside EU	-	4,430,321	151,936	1,585,347	6,167,604
Total	**30,438,781**	**4,695,602**	**708,199**	**5,498,749**	**41,341,331**

Year ending 31 December 2020 (all in €)					
Gross Premium Written	**Direct Property**	**Direct Liability**	**Health**	**Reinsurance Accepted**	**Total**
Risks Located in Ireland	-	201,980	-	12,465	214,445
Risks located in other EU countries	32,142,291	1,694,092	516,145	4,427,139	38,779,667
Risks located outside EU	-	2,208,599	1,004,860	754,035	3,967,494
Total	**32,142,291**	**4,104,671**	**1,521,005**	**5,193,639**	**42,961,606**

Financial year ended 31 December 2021 (All in €)					
	Direct Property	**Direct Liability**	**Health**	**Reinsurance Accepted**	**Total**
Gross earned premium	30,438,781	4,695,602	708,199	5,498,749	41,341,331
Gross incurred claims	(19,758,772)	(5,132,228)	(338,650)	-	(25,229,650)
Gross operating expenses	(1,089,812)	(32,597)	(50,001)	13,209	(1,159,201)
Reinsurance balance	(13,323,994)	1,537,813	(88,000)	-	(11,874,181)
Allocated Investment Return	11,271	1,739	262	2,037	15,309
Net Technical Result	**(3,722,526)**	**1,070,329**	**231,810**	**5,513,995**	**3,093,608**

Financial year ended 31 December 2020 (All in €)					
	Direct Property	**Direct Liability**	**Health**	**Reinsurance Accepted**	**Total**
Gross earned premium	32,142,291	4,104,671	1,521,005	5,193,639	42,961,606
Gross incurred claims	(11,718,771)	1,952,466	265,557	-	(9,500,748)
Gross operating expenses	(2,718,587)	(316,805)	(150,327)	(826,972)	(4,012,691)
Reinsurance balance	(18,269,769)	(4,123,623)	(88,000)	(4,393,687)	(26,875,079)
Allocated Investment Return	33,787	4,315	1,599	5,459	45,160
Net Technical Result	**(531,049)**	**1,621,024**	**1,549,834**	**(21,561)**	**2,618,248**

A.3 Investment Performance

A.3.1 Income and expenses arising by asset class

The table below outlines a breakdown of the investment income by asset class:

Asset Class	2021	2020
	€	€
Cash and Deposits Interest	47,765	125,659

A.3.2 Gains and losses recognised directly in equity

No gains and losses have been recognised directly in equity.

A.4 Performance of Other Activities

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

A.5 Any Other Information

The Company continues to closely monitor developments relating to the COVID-19 pandemic which emerged in Quarter 1 2020. The Company deployed business continuity plans and the Company continued to operate in 2021 with minimal disruption. The Directors have reviewed the composition of its current assets and believe that the Company has sufficient liquid assets to meet its liabilities. Furthermore, the Directors have also assessed the security and recoverability of the Company's assets and, at this time, they consider that they are not at risk.

B SYSTEM of GOVERNANCE

B.1 General information on the system of governance

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

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

Board of Directors:

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

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

Name	**PCF**	**Date Appointed**	**Date Resigned**
John O'Neill	Non-Executive Director (PCF2)	01/09/2004	N/a
Jonathan O'Reilly	Chief Executive Director (PCF8)	14/02/2012	N/a
Marc Denizot	Non-Executive Director (PCF2)	31/05/2013	N/a
Oliver Wild	Non-Executive Director (PCF2)	28/11/2013	N/a
Robert Frewen	Non-Executive Director (PCF2)	03/10/2019	N/a

Board Sub-Committees:

The Board recognises that it is necessary to have in place such sub-committees of the Board as are necessary to ensure that the business is being managed, conducted and controlled in a prudent manner with administrative and accounting procedures and internal control mechanisms and risk management systems that are sound and appropriate for the business.

Risk Committee:

The Board has established a Risk Committee. In line with the provisions of The Code, as the board comprises only 5 members, the full board also acts as the Risk Committee.

Audit Committee:

In line with the requirements of the Corporate Governance Requirements for Insurance Undertakings 2015, the Company established an Audit Committee at the Board Meeting held on 24th November 2011. In line with the provisions of The Code, as the board comprises only 5 members, the full board also acts as the Audit Committee

The duties of the Audit Committee include:

- Consider the appointment of external auditors.
- Review the relationship with external auditors: this includes the consideration of the audit fees and other fees paid for non-audit services (e.g. tax computations / advice).
- Review the financial reporting and internal control procedures, including reports issued by the Financial Advisory Committee.

- Engage with the internal audit function and/or internal audit team and agree the scope of their annual review.
- Review the internal audit procedures.
- Review any reports released by the internal auditor.
- Review the management of financial matters and focus on the independence and objectivity of the external auditors as well as the freedom allowed to the internal auditor.
- Review consistency of accounting policies both on a year-to-year basis and across the Company.

Chief Executive Officer:

The Board has delegated authority for oversight of the operations and administration of the Company to the Chief Executive Officer who has relevant financial services expertise, qualifications and background to ensure that he has the necessary knowledge, skills and experience required to comprehend fully each of the following:

- the nature of the Company's business activities and related risks;
- his individual direct and indirect responsibilities and the Board's responsibilities;
- the Company's financial statements

Chief Risk Officer:

The Board has delegated authority for managing the risk control function of the Company to the Chief Risk Officer who has relevant expertise, qualifications and background to ensure that he has the necessary knowledge, skills and experience required to:

- maintain effective processes to identify, manage and monitor risks across the institution;
- risk reporting in a timely and comprehensive manner to the risk committee;
- facilitation of the setting of the risk appetite by the Board

Independent Control Functions:

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

Risk Management Function

The role of the Company's risk management function ("RMF") is to identify and evaluate the major risks facing the Company and to facilitate the implementation of the risk management system. Having considered the nature, scale and complexity of the Company the Board has determined that the role of the Risk Management Function is vested with the Chief Risk Officer.

The roles and responsibilities of the RMF are set out within the Company's risk management policy.

Compliance Function

In order to effectively monitor and report on the Company's requirement to be in compliance with all applicable laws and regulatory requirements, the Board of Directors has appointed Mr. E. Brennan as Head of Compliance / Compliance Officer. The Compliance Officer reports to the Board.

Actuarial Function

To ensure compliance with Solvency II obligations, the role of the Head of Actuarial Function ("HoAF") is outsourced to Ms. Delphine Do Huu from Marsh SAS (subject to regulatory approval).

Internal Audit Function

The Internal Audit Function is an outsourced service provided by Veolia Group, which reports directly to the Board of Directors. The scope of internal audit activities includes the examination and evaluation of the effectiveness of the internal control, risk management and governance systems and processes of the entire licensed entity, including the Company's outsourced activities. The Internal Audit function reports to the Board.

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

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

As the Company is classified by the Central Bank as an Insurance Undertaking, there is a corporate governance requirement to appoint a number of Independent Non-Executive Director to Board positions. Accordingly, these individuals are remunerated for their expertise and time spent preparing and participating in quarterly meetings. Remuneration is commensurate to the individual's experience and level of input into the activities of the Board, based on market rates.

In addition, owing to the classification of the Company as a non-captive, a position of Chief Executive Officer is required. This one individual constitutes the Company's sole employee during the year.

B.2 Fit and Proper requirements

B.2.1 Requirements for skills, knowledge and expertise

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

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

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

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

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

- approval is sought from the Central Bank of Ireland ('CBI') prior to the appointment of persons performing Pre-Approval Control Functions.

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

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

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

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

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

B.3.1 Risk management system

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

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

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

The Company performs an Own Risk and Solvency Assessment ("ORSA") at least annually. The main purpose of performing the ORSA is to ensure that the Company engages in a process of assessing all risks inherent in the business and determining the corresponding capital needs.

In order to ensure effective risk governance, the system has been designed to identify, assess, manage and monitor and report exposure to risk. This is a continuous process subject to continuous review and development.

Identify

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

Assess

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

Manage

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

Monitor/Report

Monitoring and reporting to the Board is undertaken at least quarterly from a number of sources including the Risk Management Function, Compliance Officer and the Internal Audit Function.

Findings from the development of the risk register are considered by the Board in the preparation of the annual internal audit plans.

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

B.3.2 Implementation of the Risk management system

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

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

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

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

1st Line of Defence – Day to Day:

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

2nd Line of Defence – Oversight:

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

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

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

3rd Line of Defence – Independent Assessment:

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

The responsibilities of the Internal Audit function are set out in the Company's Board approved Internal Audit Policy. Mr. Oliver Wild is the designated Internal Audit Function holder. The Internal Audit Function reports to the Board.

Actuarial Function: The role of the Actuarial Function is outsourced to Marsh SAS. The designated Head of Actuarial Function is Ms. Delphine Do Huu, subject to regulatory approval.

B.3.3 **ORSA**

B.3.3.1 ORSA process

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

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

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

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

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

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

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

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

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

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

B.3.3.2 ORSA review and approval process

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

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

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

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

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

- Significant change in the risk profile of the Company which can be defined as a major change to the business strategy/business activity/insurance program etc. (i.e. business activities other than the Company's current underwriting activity)
- Significant changes to Non-Financial matters - Operational/Regulatory and Legal/Strategic/Group Risks.

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

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

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

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

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

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

B.4 Internal Control System

B.4.1 Description of the internal control system

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

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

1st Line of Defence: “Day to day” operations and associated controls/

2nd Line of Defence: oversight from Compliance, Risk Management functions

3rd Line of Defence – Independent Assessment, internal audit and actuarial functions.

B.4.2 Implementation of the compliance function

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

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

The role of the Board appointed Compliance Officer is to:

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

The Compliance Officer presents a Compliance Officer report to the Board annually which outlines the following:

- Details of regulatory correspondence with the Company
- Details of regulatory developments
- Details of which controls were tested since the last report and the results of the tests
- Conclusions and recommendations on the Company’s compliance with reinsurance legislation and guidelines.

B.5 Internal audit function

B.5.1 Implementation of the internal audit function

Mr. Oliver Wild is nominated Head of the Internal Audit Function, whilst the Company has outsourced the performance of its Internal Audit Function to Veolia Group. The internal audit function possesses a remit to examine and evaluate the functioning, effectiveness and efficiency of the internal control system and all other elements of the system of governance.

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

- establish, implement and maintain an audit plan setting out the audit work to be undertaken in the upcoming years, taking into account all activities and the complete system of governance of the Company;
- take a risk-based approach in deciding its priorities;
- report the audit plan to Board of Directors;
- issue recommendations based on the result of work carried out in accordance with (a) above, and submit a written report on its findings and recommendations to the Board of Directors on at least an annual basis.

B.5.2 Independence of the internal audit function

The internal audit function provides independent and objective assurance services, via an Internal Audit Agreement between the Company and Veolia Group.

B.6 Actuarial function

The role of the Actuarial Function is outsourced to Ms. Delphine Do Huu from Marsh SAS (subject to regulatory approval), via the terms of a written SLA.

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

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

B.7 Outsourcing

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

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

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

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

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

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

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

C RISK PROFILE

C.1 Underwriting risk

C.1.1 Key underwriting risks

Non-Life underwriting risk at 31 December 2021 comprises 55% (2020: 70%) of the undiversified basic SCR.

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

Premium and reserve risk

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

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

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

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

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

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

Catastrophe risk

The risk of a major natural or man-made event occurring while not listed in the Company's risk register has been considered and any exposure to such events are restricted due to the establishment of low policy limits.

C.1.2 Material risk concentrations anticipated over the business planning period

The Company seeks to avoid concentration of risks by accepting insurance of risks which are sourced across EU/EEA and North America and across a number of lines of business.

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

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

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

C.2 Market risk

C.2.1 Material market risks

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

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

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

Market Risk sub-module	2021	2020
	€	€
Equity	-	-
Concentration	10,694,593	4,899,105
Spread	1,018,638	567,504
Interest Rate	81,903	71,180
FX Risk	575,156	890,629

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

Concentration risk is considered a material risk given the current structure of the investments. The capital charge of €10,694,593 arises from the fixed deposits and equities.

Spread Risk: the sensitivity of the value of investments, primarily bonds and deposits in respect of the Company, to changes in the level or in the volatility of credit spreads. Spread risk is linked to the credit rating of assets held and the effect of a market change in the credit curve.

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

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

C.2.2 Material risk concentrations

Market risk concentration arises in respect of the fixed deposits (two counterparties) and UCIT's investments with varying credit ratings.

C.2.3 Prudent person principle applied to market risks

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

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

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

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

C.3 Credit risk

C.3.1 Material credit risks

Credit risk at 31 December 2021 comprises 11% (2020: 16%) of the undiversified basic SCR.

Credit risk is the risk that the Company is exposed to lower returns or loss if another party fails to perform its financial obligations towards the Company.

Counterparty Default Risk

The Company utilises reinsurance to manage efficiently its insurance risk. As such, it is exposed to the failure of these counterparties. The Company seeks to minimise this exposure by diversifying its placement of reinsurance with both commercial market reinsurers and with another Group company.

The Company has little appetite for counterparty default risk in relation to investments and seeks to invest in institutions of the greatest strength and stability.

C.3.2 Material risk concentrations

The Company does not have any material credit risk concentrations.

C.3.3 Prudent person principle applied to credit risks

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

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

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

- Minimum rating criteria for the placing of deposits and opening of bank accounts, in line with the Investment and Asset Liability Policy;
- Monitoring the credit ratings of counterparties;
- Reporting of cash, investment and liquidity positions takes place quarterly as part of the Company's management accounts reporting process;
- Retaining risk within an approved risk appetite and solvency requirements;

C.4 Liquidity risk

C.4.1 Material liquidity risks

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

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

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

The Company's cash in-flow is generated from premium income. Its cash out-flow consists mainly of claims payments and a small volume of administration expenses.

C.4.2 Prudent person principle applied to liquidity risks

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

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

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

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

C.5 Operational risk

C.5.1 Material operational risks

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

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

Operational risks are also addressed in the capital requirement as an addition to the BSCR to the extent that they have not been explicitly covered in other risk modules. The operational risk capital charge as at 31 December 2021 is €1,985,788 (2020: €1,839,429).

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

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

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

C.6 Other material risks

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

Sample risks include:

- Regulatory and Compliance;
- Loss of key personnel/director's resignation;
- Outsourcing.

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

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

The Board recognises that the Company operates on a basis of an outsourced model, whereby the day-to-day operations and number of key functions are outsourced; the Board is satisfied that all outsourcing agreements include an appropriate period notice.

This would provide the Company with sufficient time to find an alternative professional services provider. Additionally, performance of outsourced providers is reviewed on an annual basis and such review would flag any potential deficiencies of the individual service provider.

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

C.7 Any Other Information

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

D Valuation for Solvency Purposes

D.1 Assets

D.1.1-2 Local GAAP and Solvency II Valuations

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

	31/12/2021		31/12/2020	
	Assets per GAAP	Assets per Solvency II	Assets per GAAP	Assets per Solvency II
	Total €	Total €	Total €	Total €
Cash and cash equivalents	25,619,549	25,619,549	42,862,737	42,862,737
Deposits other than cash equivalents	19,616,060	19,616,060	19,287,330	19,287,330
Collective Investments Undertakings	24,800,440	24,800,440	9,916,045	9,916,045
Reinsurance recoverables	53,406,271	44,747,376	51,614,315	40,900,153
Insurance and intermediaries receivables	-	-	873,918	11,532
Reinsurance Receivables	3,619,765	-	61,207	61,207
Deferred Acquisition Costs	-	-	2	-
Deferred Tax Asset	-	316,146	-	-
Other Assets	723,252	723,252	717,637	717,637
Total assets	127,785,337	115,822,823	125,333,191	113,756,641

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

Cash and cash equivalents
Cash and cash equivalents include deposits held at call with bank and cash balances with investment managers. Cash and cash equivalents are measured at cost, being the market value of the consideration paid.

Deposits other than cash equivalents
Deposits other than cash equivalents include fixed deposit accounts and are measured at cost, being the market value of the consideration paid.

Collective Investment Undertakings
Collective Investments Undertakings include equity funds and debt instruments in the form of bond or fixed income funds. Collective Investments are measured at quoted market price in active markets for similar assets.

Other Assets
Other Assets include amounts receivable and also a tax refund due to the Company. Other Assets are valued at transaction price.

Realised and unrealised gains and losses arising from the changes in the fair value of investments are presented in the non-technical profit and loss account in the period in which they arise. Interest income is recognised when earned and investment management and other related expenses are recognised when incurred.

D.2 Technical Provisions

D.2.1 Local GAAP and Solvency II Valuations

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

The table below sets out the results of the technical provision calculations on the financial statements together with the current accounting basis used to determine the Solvency II valuation.

Liabilities	2021		2020	
	GAAP	SII Valuation Principles	GAAP	SII Valuation Principles
Gross Technical Provisions – Non-Life (Excluding Health)	76,710,815	65,504,575	76,614,644	62,617,891
TP calculated as a whole (Best estimate + Risk margin)				
Best Estimate	-	63,419,086	-	59,283,361
Risk Margin	-	2,085,489	-	3,334,530
Gross Technical Provisions - Health (Similar to Non-Life)	-	2,990,963	-	2,305,399
TP calculated as a whole (Best estimate + Risk margin)	-	-	-	-
Best Estimate	-	2,773,857	-	2,030,948
Risk Margin	-	217,106		274,451
Other Technical Provisions	1,534,216	-	1,532,293	-
Deferred Tax Liabilities	-	-	-	205,887
Insurance & Intermediaries Payable	39,930	39,930	342,313	342,313
Reinsurance Payables	103,827	103,827	-	-
Any Other Liabilities	485,789	485,789	633,487	633,487
Total Liabilities	**78,874,577**	**69,125,084**	**79,122,736**	**66,104,977**

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

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

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

Cash-flows and discounting: Cash-flows have been discounted using the EUR risk free yield curve as at 31 December 2021 as published by the European Insurance and Occupational Pensions Authority ("EIOPA").

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

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

Risk Margin

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

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

The Company has used Method 3 from Guideline 61 of the Solvency II “Guidelines on the valuation of technical provisions” (EIOPA-BoS-14/166 EN). This involves approximating the discounted sum of all future Solvency Capital Requirements in a single step without approximating the Solvency Capital Requirements for each future year separately as referred in Article 58 (b) of Commission Delegated Regulation 2015/35, inter alia by using the modified duration of the insurance liabilities as a proportionality factor.

The methodologies and simplifications are consistent with market practice, Solvency II principles and proportionate to the business written by the Company. Simplifications are not considered to be material to the technical provisions at this point in time, although they shall be reviewed in future and additional work will be performed to quantify the impact as and when necessary.

D.2.2 Uncertainty associated with the value of Technical Provisions

All estimates of unpaid loss reserves are inherently uncertain. The key areas of uncertainty of the technical provisions are driven by the uncertainty of the underlying booked reserves. Hence, the key area of particular uncertainty relating to the Company’s liabilities relates to the potential for volatility in claims experience in the future that is not reflected in estimates of ultimate claims produced using actuarial methods. This arises as the ultimate liability for claims is subject to the outcome of events yet to occur, including changes in the attitudes of courts and claimants towards the settlement of claims. Techniques and assumptions have been employed in estimating claims which are expected to be appropriate, but it should be recognised that future loss emergence may deviate, perhaps materially from claim estimates.

D.2.3 Solvency II and local GAAP valuation differences of Technical Provisions by material line of business

See analysis in Section D2.1.

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

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

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

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

D.2.8 Recoverables from reinsurance and special purpose vehicles

The impact of reinsurance under SII valuation principles is to reduce the Company's Gross Technical Provisions by €44,747,376 (2020: €40,900,153).

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

There are no material changes in the relevant assumptions made in the calculation of the technical provisions compared to the previous reporting period.

D.3 Other liabilities

See analysis in Section D2.1.

D.4 Alternative Methods for Valuation for other liabilities

The Company does not use any alternative methods for valuation.

D.5 Any Other Information

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

E CAPITAL MANAGEMENT

E.1 Own funds

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

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

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

The medium-term capital management plan set by the Board is as follows:

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

E.1.2 Own funds analysed by tiers

An analysis of own funds is shown below:

Date	Description	Tier 1 €	Tier 3 €	Total €
1 January 2021	Opening balance comprising: Ordinary share capital Reconciliation Reserve Deferred Tax Asset	 18,000,000 29,651,665 -	 - - -	 18,000,000 29,651,665 -
	Movement in the Reconciliation reserve for the year ended 31 December 2020	(1,270,071)	316,146	(953,925)
31 December 2021	Closing balance	46,381,594	316,146	46,697,740
	Represented by:			
	Ordinary share capital	18,000,000	-	18,000,000
	Reconciliation reserve (comprising retained earnings and Solvency II adjustments)	28,381,594	-	28,381,594
	Deferred Tax Asset	-	316,146	316,146
	Total Basic own funds after deductions	46,381,594	316,146	46,697,740

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

The Company has no tier 1 restricted own funds and no tier 2 own funds.

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

The eligible amount of own funds to cover the Solvency Capital Requirement is €46,697,740 (2020: €47,651,665). This is comprised of Tier 1 unrestricted Basic Own Funds of €46,381,594 (2020: €47,651,665) and Tier 3 of €316,146 (2020: €Nil).

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

The eligible amount of own funds to cover the Minimum Capital Requirement is €46,381,594 (2020: €47,651,665). This is comprised of Tier 1 unrestricted Basic Own Funds of €46,381,594 (2020: €47,651,665).

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

The difference between the Company's equity as shown in its audited financial statements and the excess of assets over liabilities as calculated for solvency purposes is:

- the difference between the technical provisions calculated in accordance with the Solvency II requirements
- deferred tax adjustment in relation to the above differences

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

E.1.7 There are no ancillary own funds items.

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

E.2 Solvency Capital Requirement and Minimum Capital Requirement

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

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

	2021	2020
	€	€
SCR	31,896,248	29,833,610
MCR	7,974,062	7,458,403

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

E.2.2 Solvency Capital Requirement split by risk modules

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

SCR Overview	2021	2020
	€	€
Market risk	10,770,262	5,044,441
Counterparty default risk	4,485,985	6,004,533
Non-life underwriting risk	22,048,221	22,293,304
Health Underwriting Risk	2,885,494	3,569,754
Diversification	(10,286,502)	(8,695,181)
Basic Solvency Capital Requirement	29,910,459	28,216,851
Operational risk	1,985,788	1,839,429
Adjustment	-	(222,670)
Solvency Capital Requirement	31,896,248	29,833,610

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

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

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

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

MCR Overview	2021	2020
	€	€
Linear MCR	7,974,062	7,458,403
SCR	31,896,248	29,833,610
MCR cap	14,353,311	13,425,125
MCR floor	7,974,062	7,458,403
Combined MCR	7,974,062	7,458,403
Absolute floor of the MCR	3,700,000	3,700,000
Minimum Capital Requirement	7,974,062	7,458,403

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

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

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

E.4 Internal model information.

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

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

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

E.6 Any other information.

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

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Solvency and Financial Condition Report (“SFCR”) for the financial year ended 31 December 2021

Disclosures

(Monetary amounts in EUR thousands)

Annex I
S.02.01.02
Balance sheet

		Solvency II value
Assets		**C0010**
Intangible assets	**R0030**	-
Deferred tax assets	**R0040**	316
Pension benefit surplus	**R0050**	-
Property, plant & equipment held for own use	**R0060**	
Investments (other than assets held for index-linked and unit-linked contracts)	**R0070**	44,417
Property (other than for own use)	**R0080**	-
Holdings in related undertakings, including participations	**R0090**	-
Equities	**R0100**	-
Equities - listed	**R0110**	-
Equities - unlisted	**R0120**	-
Bonds	**R0130**	-
Government Bonds	**R0140**	-
Corporate Bonds	**R0150**	-
Structured notes	**R0160**	-
Collateralised securities	**R0170**	-
Collective Investments Undertakings	**R0180**	24,800
Derivatives	**R0190**	-
Deposits other than cash equivalents	**R0200**	19,617
Other investments	**R0210**	-
Assets held for index-linked and unit-linked contracts	**R0220**	-
Loans and mortgages	**R0230**	-
Loans on policies	**R0240**	-
Loans and mortgages to individuals	**R0250**	-
Other loans and mortgages	**R0260**	-
Reinsurance recoverables from:	**R0270**	44,747
Non-life and health similar to non-life	**R0280**	44,747
Non-life excluding health	**R0290**	44,836
Health similar to non-life	**R0300**	- 89
Life and health similar to life, excluding health and index-linked and unit-linked	**R0310**	-
Health similar to life	**R0320**	-
Life excluding health and index-linked and unit-linked	**R0330**	-
Life index-linked and unit-linked	**R0340**	-
Deposits to cedants	**R0350**	-
Insurance and intermediaries receivables	**R0360**	-
Reinsurance receivables	**R0370**	-
Receivables (trade, not insurance)	**R0380**	-
Own shares (held directly)	**R0390**	-
Amounts due in respect of own fund items or initial fund called up but not yet paid in	**R0400**	-
Cash and cash equivalents	**R0410**	25,619
Any other assets, not elsewhere shown	**R0420**	723
Total assets	**R0500**	115,822

Annex I
S.02.01.02
Balance sheet

		Solvency II value
Liabilities		**C0010**
Technical provisions – non-life	**R0510**	68,496
Technical provisions – non-life (excluding health)	**R0520**	65,505
TP calculated as a whole	**R0530**	-
Best Estimate	**R0540**	63,419
Risk margin	**R0550**	2,085
Technical provisions - health (similar to non-life)	**R0560**	2,991
TP calculated as a whole	**R0570**	-
Best Estimate	**R0580**	2,774
Risk margin	**R0590**	217
Technical provisions - life (excluding index-linked and unit-linked)	**R0600**	-
Technical provisions - health (similar to life)	**R0610**	-
TP calculated as a whole	**R0620**	-
Best Estimate	**R0630**	-
Risk margin	**R0640**	-
Technical provisions – life (excluding health and index-linked and unit-linked)	**R0650**	-
TP calculated as a whole	**R0660**	-
Best Estimate	**R0670**	-
Risk margin	**R0680**	-
Technical provisions – index-linked and unit-linked	**R0690**	-
TP calculated as a whole	**R0700**	-
Best Estimate	**R0710**	-
Risk margin	**R0720**	-
Contingent liabilities	**R0740**	-
Provisions other than technical provisions	**R0750**	-
Pension benefit obligations	**R0760**	-
Deposits from reinsurers	**R0770**	-
Deferred tax liabilities	**R0780**	-
Derivatives	**R0790**	-
Debts owed to credit institutions	**R0800**	-
Financial liabilities other than debts owed to credit institutions	**R0810**	-
Insurance & intermediaries payables	**R0820**	40
Reinsurance payables	**R0830**	104
Payables (trade, not insurance)	**R0840**	456
Subordinated liabilities	**R0850**	-
Subordinated liabilities not in BOF	**R0860**	-
Subordinated liabilities in BOF	**R0870**	-
Any other liabilities, not elsewhere shown	**R0880**	29
Total liabilities	**R0900**	69,125
Excess of assets over liabilities	**R1000**	46,697

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

		Line of Business for: **non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)**								
		Medical expense insurance	Income protection insurance	Workers' compensation 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
		C0010	**C0020**	**C0030**	**C0040**	**C0050**	**C0060**	**C0070**	**C0080**	**C0090**
Premiums written										
Gross - Direct Business	**R0110**	-	556	152	1,374		-	30,439	3,247	-
Gross - Proportional reinsurance accepted	**R0120**	-	-	-	-	-	-	5,499	-	-
Gross - Non-proportional reinsurance accepted	**R0130**									
Reinsurers' share	**R0140**	-	88	-	853	-	-	33,902	1,112	-
Net	**R0200**	-	468	152	521	-	-	2,036	2,135	-
Premiums earned										
Gross - Direct Business	**R0210**	-	556	152	1,374		-	30,439	3,247	-
Gross - Proportional reinsurance accepted	**R0220**	-	-	-	-	-	-	5,499	-	-
Gross - Non-proportional reinsurance accepted	**R0230**									
Reinsurers' share	**R0240**	-	88	-	853	-	-	33,902	1,112	-
Net	**R0300**	-	468	152	521	-	-	2,036	2,135	-
Claims incurred										
Gross - Direct Business	**R0310**	-	131	244	2,417		-	21,389	3,883	-
Gross - Proportional reinsurance accepted	**R0320**	-	-	-	-	-	-	-	-	-
Gross - Non-proportional reinsurance accepted	**R0330**									
Reinsurers' share	**R0340**	-	-	-	1,102	-	-	21,378	3,026	-
Net	**R0400**	-	131	244	1,315	-	-	11	857	-
Changes in other technical provisions										
Gross - Direct Business	**R0410**	-	-	-	-	-	-	-	-	-
Gross - Proportional reinsurance accepted	**R0420**	-	-	-	-	-	-	-	-	-
Gross - Non- proportional reinsurance accepted	**R0430**									
Reinsurers'share	**R0440**	-	-	-	-	-	-	-	-	-
Net	**R0500**	-	-	-	-	-	-	-	-	-
Expenses incurred	**R0550**	-	98	5	82	-	-	331	125	-
Other expenses	**R1200**									
Total expenses	**R1300**									

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

		Line of Business for: **non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)**			Line of business for: **accepted non-proportional reinsurance**				Total
		Legal expenses insurance	Assistance	Miscellaneous financial loss	Health	Casualty	Marine, aviation, transport	Property	
		C0100	**C0110**	**C0120**	**C0130**	**C0140**	**C0150**	**C0160**	**C0200**
Premiums written									
Gross - Direct Business	**R0110**	-	-	74					35,842
Gross - Proportional reinsurance accepted	**R0120**	-	-	-					5,499
Gross - Non-proportional reinsurance accepted	**R0130**				-	-	-	-	-
Reinsurers' share	**R0140**	-	-	72	-	-	-	-	36,027
Net	**R0200**	-	-	-	-	-	-	-	5,312
Premiums earned									-
Gross - Direct Business	**R0210**	-	-	74					35,842
Gross - Proportional reinsurance accepted	**R0220**	-	-	-					5,499
Gross - Non-proportional reinsurance accepted	**R0230**				-	-	-	-	-
Reinsurers' share	**R0240**	-	-	72	-	-	-	-	36,027
Net	**R0300**	-	-	-	-	-	-	-	5,312
Claims incurred									-
Gross - Direct Business	**R0310**	-	-	-					28,064
Gross - Proportional reinsurance accepted	**R0320**	-	-						-
Gross - Non-proportional reinsurance accepted	**R0330**				-	-	-	-	-
Reinsurers' share	**R0340**	-	-	-	-	-	-	-	25,506
Net	**R0400**	-	-	-	-	-	-	-	2,558
Changes in other technical provisions									
Gross - Direct Business	**R0410**	-	-	-					-
Gross - Proportional reinsurance accepted	**R0420**	-	-	-					-
Gross - Non- proportional reinsurance accepted	**R0430**				-	-	-	-	-
Reinsurers'share	**R0440**	-	-	-	-	-	-	-	-
Net	**R0500**	-	-	-	-	-	-	-	-
Expenses incurred	**R0550**	-	-	1	-	-	-	-	642
Other expenses	**R1200**								(1,574)
Total expenses	**R1300**								(932)

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

			Home country	Top 5 countries (by amount of gross premium written) - non-life obligations			Total Top 5 and home country
			Home country	FR	GB	US	
Premiums written	Gross - Direct Business	R0110	228	31,069	2,100	2,445	35,842
	Gross - Proportional reinsurance accepted	R0120	-	5,499	-	-	5,499
	Gross - Non-proportional reinsurance accepted	R0130					
	Reinsurers' share	R0140	-	34,062	1,965	-	36,027
	Net	R0200	228	2,506	135	2,445	5,314
Premiums earned	Gross - Direct Business	R0210	228	31,069	2,100	2,445	35,842
	Gross - Proportional reinsurance accepted	R0220	-	5,499	-	-	5,499
	Gross - Non-proportional reinsurance accepted	R0230					
	Reinsurers' share	R0240	-	34,062	1,965	-	36,027
	Net	R0300	228	2,506	135	2,445	5,314
Claims incurred	Gross - Direct Business	R0310	17	18,600	7,150	2,296	28,063
	Gross - Proportional reinsurance accepted	R0320	-		-	-	-
	Gross - Non-proportional reinsurance accepted	R0330					
	Reinsurers' share	R0340	-	23,434	2,072	-	25,506
	Net	R0400	17	(4,834)	5,078	2,296	2,557
Changes in other technical provisions	Gross - Direct Business	R0410	-		-	-	-
	Gross - Proportional reinsurance accepted	R0420	-		-	-	-
	Gross - Non-proportional reinsurance accepted	R0430					
	Reinsurers' share	R0440	-		-	-	-
	Net	R0500	-	-	-		-
Expenses incurred		R0550	1,178	(634)	80	19	643
Other expenses		R1200					(1,574)
Total expenses		R1300					(931)

Annex I
S.17.01.02
Non-life Technical Provisions

		Direct business and accepted proportional reinsurance												Accepted non-proportional reinsurance				
		Medical expense insurance	Income protection insurance	Workers' compensation 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	Legal expenses insurance	Assistance	Miscellaneous financial loss	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport	Non-proportional property reinsurance	Total Non-Life obligation
		C0020	C0030	C0040	C0050	C0060			C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180
Technical provisions calculated as a whole	**R0010**				-	-			-	-			-					-
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole	**R0050**				-	-			-	-			-					-
Technical provisions calculated as a sum of BE and RM																		
Best estimate																		
Premium provisions																		
Gross	**R0060**	-	(236)	(57)	84	-	-	(8,197)	(293)	-	-	-	(251)	-	-	-	-	(8,950)
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	**R0140**	-	(89)	-	(59)	-	-	(8,116)	(82)	-	-	-	(253)	-	-	-	-	(8,599)
Net Best Estimate of Premium Provisions	**R0150**	-	(147)	(57)	143	-	-	(81)	(211)	-	-	-	2	-	-	-	-	(351)
Claims provisions																		
Gross	**R0160**	-	352	2,714	10,666	-	-	35,572	25,838	-	-	-	-	-	-	-	-	75,142
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	**R0240**	-	-	-	6,256	-	-	37,261	9,829	-	-	-	-	-	-	-	-	53,346
Net Best Estimate of Claims Provisions	**R0250**	-	352	2,714	4,410	-	-	(1,689)	16,009	-	-	-	-	-	-	-	-	21,796
Total Best estimate - gross	**R0260**	-	117	2,657	10,749	-	-	27,375	25,546	-	-	-	(251)	-	-	-	-	66,193
Total Best estimate - net	**R0270**	-	206	2,657	4,552	-	-	(1,770)	15,799	-	-	-	2	-	-	-	-	21,446
Risk margin	**R0280**	-	43	174	330	-	-	620	1,131	-	-	-	4	-	-	-	-	2,302
Amount of the transitional on Technical Provisions																		
Technical Provisions calculated as a whole	**R0290**																	-
Best estimate	**R0300**																	-
Risk margin	**R0310**																	-
Technical provisions - total																		
Technical provisions - total	**R0320**	-	160	2,831	11,079	-	-	27,995	26,677	-	-	-	(247)	-	-	-	-	68,495
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	**R0330**	-	(89)	-	6,197	-	-	29,145	9,747	-	-	-	(253)	-	-	-	-	44,747
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	**R0340**	-	249	2,831	4,882	-	-	(1,150)	16,930	-	-	-	6	-	-	-	-	23,748

Annex I
S.19.01.21
Non-life Insurance Claims Information

Total Non-Life Business

Accident year / Underwriting year	**Z0010**	Underwriting Year

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

		Development year												In Current year	Sum of years (cumulative)
	Year	**0**	**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**	**10 & +**			
		C0010	**C0020**	**C0030**	**C0040**	**C0050**	**C0060**	**C0070**	**C0080**	**C0090**	**C0100**	**C0110**		**C0170**	**C0180**
Prior	**R0100**											1,399	**R0100**	1,399	1,399
N-9	**R0160**	2,443	7,473	2,688	494	57	549	38	592	64	11		**R0160**	11	14,409
N-8	**R0170**	427	4,940	5,480	829	86	936	577	- 482	-			**R0170**	-	12,793
N-7	**R0180**	2,685	3,716	3,065	535	41	207	28	434				**R0180**	434	10,711
N-6	**R0190**	954	2,638	2,619	604	887	899	210					**R0190**	210	8,811
N-5	**R0200**	1,350	12,549	472	392	230	745						**R0200**	745	15,738
N-4	**R0210**	1,789	7,736	7,686	- 22	146							**R0210**	146	17,335
N-3	**R0220**	1,857	4,990	2,106	685								**R0220**	685	9,638
N-2	**R0230**	1,009	11,704	12,546									**R0230**	12,546	25,259
N-1	**R0240**	9	8,927										**R0240**	8,927	8,936
N	**R0250**	28											**R0250**	28	28
												Total	**R0260**	25,131	125,057

Gross undiscounted Best Estimate Claims Provisions
(absolute amount)

		Development year												Year end (discounted data)
	Year	**0**	**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**	**10 & +**		
		C0200	**C0210**	**C0220**	**C0230**	**C0240**	**C0250**	**C0260**	**C0270**	**C0280**	**C0290**	**C0300**		**C0360**
Prior	**R0100**											8,566	**R0100**	8,574
N-9	**R0160**	-	-	-	-	2,047	2,086	1,801	1,296	165	185		**R0160**	186
N-8	**R0170**	-	-	-	2,968	1,666	976	175	44	94			**R0170**	95
N-7	**R0180**	-	-	4,811	2,269	1,079	692	632	1,177				**R0180**	1,178
N-6	**R0190**	-	11,871	5,700	5,129	2,052	589	388					**R0190**	387
N-5	**R0200**	27,132	6,408	5,002	4,502	3,537	3,182						**R0200**	3,160
N-4	**R0210**	25,040	13,346	3,462	2,440	2,293							**R0210**	2,285
N-3	**R0220**	14,661	9,973	5,615	4,422								**R0220**	4,416
N-2	**R0230**	39,010	26,971	14,258									**R0230**	14,230
N-1	**R0240**	20,195	9,748										**R0240**	9,756
N	**R0250**	30,763											**R0250**	30,877
												Total	**R0260**	75,144

Annex I

S.23.01.01

Own funds

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation (EU) 2015/35						
Ordinary share capital (gross of own shares)	**R0010**	18,000	18,000		-	
Share premium account related to ordinary share capital	**R0030**	-	-		-	
Iinitial 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**	28,382	28,382			
Subordinated liabilities	**R0140**	-		-	-	-
An amount equal to the value of net deferred tax assets	**R0160**	316				316
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**	46,698	46,382	-	-	316
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	**R0300**	-				
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	**R0310**	-			-	
Unpaid and uncalled preference shares callable on demand	**R0320**	-			-	-
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	**R0330**	-			-	-
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	**R0340**	-			-	
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	**R0350**	-			-	-
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	**R0360**	-			-	
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	**R0370**	-			-	-
Other ancillary own funds	**R0390**	-			-	-
Total ancillary own funds	**R0400**	-			-	-
Available and eligible own funds						
Total available own funds to meet the SCR	**R0500**	46,698	46,382	-	-	316
Total available own funds to meet the MCR	**R0510**	46,382	46,382	-	-	
Total eligible own funds to meet the SCR	**R0540**	46,698	46,382	-	-	316
Total eligible own funds to meet the MCR	**R0550**	46,382	46,382	-	-	
SCR	**R0580**	31,896				
MCR	**R0600**	7,974				
Ratio of Eligible own funds to SCR	**R0620**	146%				
Ratio of Eligible own funds to MCR	**R0640**	582%				

		C0060	
Reconciliation reserve			
Excess of assets over liabilities	**R0700**	46,698	
Own shares (held directly and indirectly)	**R0710**	-	
Foreseeable dividends, distributions and charges	**R0720**	-	
Other basic own fund items	**R0730**	18,316	
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	**R0740**	-	
Reconciliation reserve	**R0760**	28,382	
Expected profits			
Expected profits included in future premiums (EPIFP) - Life business	**R0770**	-	
Expected profits included in future premiums (EPIFP) - Non- life business	**R0780**	-	
Total Expected profits included in future premiums (EPIFP)	**R0790**	-	

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

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0100
Market risk	R0010	10,777		
Counterparty default risk	R0020	4,486		
Life underwriting risk	R0030	-	-	-
Health underwriting risk	R0040	2,885	-	
Non-life underwriting risk	R0050	22,048	-	
Diversification	R0060	(10,286)		
Intangible asset risk	R0070	-		
Basic Solvency Capital Requirement	R0100	29,910		

Calculation of Solvency Capital Requirement		C0100
Operational risk	R0130	1,986
Loss-absorbing capacity of technical provisions	R0140	-
Loss-absorbing capacity of deferred taxes	R0150	-
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	-
Solvency capital requirement excluding capital add-on	R0200	31,896
Capital add-on already set	R0210	-
Solvency capital requirement	R0220	31,896
Other information on SCR		
Capital requirement for duration-based equity risk sub-module	R0400	-
Total amount of Notional Solvency Capital Requirement for remaining part	R0410	-
Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420	-
Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios	R0430	-
Diversification effects due to RFF nSCR aggregation for article 304	R0440	-

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

		C0130
LAC DT	R0640	-
LAC DT justified by reversion of deferred tax liabilities	R0650	
LAC DT justified by reference to probable future taxable economic profit	R0660	-
LAC DT justified by carry back, current year	R0670	
LAC DT justified by carry back, future years	R0680	
Maximum LAC DT	R0690	

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

Linear formula component for non-life insurance and reinsurance obligations

		C0010
MCR_{NL} Result	**R0010**	7,974

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
		C0020	**C0030**
Medical expense insurance and proportional reinsurance	**R0020**	-	-
Income protection insurance and proportional reinsurance	**R0030**	206	-
Workers' compensation insurance and proportional reinsurance	**R0040**	2,657	477
Motor vehicle liability insurance and proportional reinsurance	**R0050**	4,552	522
Other motor insurance and proportional reinsurance	**R0060**	-	-
Marine, aviation and transport insurance and proportional reinsurance	**R0070**	-	-
Fire and other damage to property insurance and proportional reinsurance	**R0080**	-	2,036
General liability insurance and proportional reinsurance	**R0090**	15,799	2,280
Credit and suretyship insurance and proportional reinsurance	**R0100**	-	-
Legal expenses insurance and proportional reinsurance	**R0110**	-	-
Assistance and proportional reinsurance	**R0120**	-	-
Miscellaneous financial loss insurance and proportional reinsurance	**R0130**	2	-
Non-proportional health reinsurance	**R0140**	-	-
Non-proportional casualty reinsurance	**R0150**	-	-
Non-proportional marine, aviation and transport reinsurance	**R0160**	-	-
Non-proportional property reinsurance	**R0170**	-	-

Linear formula component for life insurance and reinsurance obligations

		C0040
MCR_L Result	**R0200**	-

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

Overall MCR calculation

		C0070
Linear MCR	**R0300**	7,974
SCR	**R0310**	31,896
MCR cap	**R0320**	14,353
MCR floor	**R0330**	7,974
Combined MCR	**R0340**	7,974
Absolute floor of the MCR	**R0350**	3,700
		C0070
Minimum Capital Requirement	**R0400**	7,974