

Euro Insurances DAC (LPINS)

Solvency and Financial Condition Report (“SFCR”) 2021



For the year-end 31 December 2021

Contents

Executive Summary	6
a) Summary Section A: Business and Performance	6
b) Summary Section B: System of Governance	7
c) Summary Section C: Risk Profile	7
d) Summary Section D: Valuation for Solvency Purposes	8
e) Summary Section E: Capital Management	9
f) Summary: Material Changes over the Reporting Period	10
 A Business and Performance	 11
1. Business and External Environment	11
a) Name and Legal Form	11
b) Supervisor and External Auditor	11
c) Position within the Group	11
d) Material Lines of Business and Geographical Areas	12
e) Significant Events over the Period	12
2. Underwriting Performance	13
a) Underwriting Performance by Material Line of Business / Geographical Area	13
3. Investment Performance	15
a) Investment Performance by Asset Class	15
b) Investments in Securitisations	15
4. Performance of other activities	16
a) Description of Other Material Income / Expenses	16
5. Any other information	17
 B System of Governance	 18
1. General Information on the System of Governance	18
a) Board and Sub-Committee Structure	18
b) Remuneration Policy and Practice	19
c) Material Transactions with Connected Persons	20
2. Fit and Proper Requirements	21
3. Risk Management System including the Own Risk and Solvency Assessment	22
a) Risk Management System	22
b) Own Risk and Solvency Assessment	23
4. Internal Control System	26
a) Compliance Function	26
5. Internal Audit Function	27
6. Actuarial Function	28

7.	Outsourcing	29
8.	Any other information	30
C	Risk Profile	31
1.	Underwriting Risk	32
a)	Risk Exposure	32
b)	Risk Concentration	32
c)	Risk Mitigation	32
d)	Risk Sensitivity	33
2.	Market Risk	34
a)	Risk Exposure	34
b)	Risk Concentration	34
c)	Risk Mitigation	34
d)	Risk Sensitivity	35
3.	Credit Risk	36
a)	Risk Exposure	36
b)	Risk Concentration	36
c)	Risk Mitigation	37
d)	Risk Sensitivity	37
4.	Liquidity Risk	38
a)	Risk Exposure	38
b)	Risk Concentration	38
c)	Risk Mitigation	39
d)	Risk Sensitivity	40
5.	Operational Risk	41
a)	Risk Exposure	41
b)	Risk Concentration	41
c)	Risk Mitigation	41
d)	Risk Sensitivity	42
6.	Any other material risks	43
a)	Cyber Risk	43
b)	Climate change	43
c)	Group Risk	44
d)	Strategic Risk	44
e)	Reputational Risk	44
D	Valuation for Solvency Purposes	45
1.	Assets	45
2.	Technical Provisions	47
a)	Technical Provisions Basis, Methods and Assumptions	47
b)	Level of Uncertainty associated with the amount of Technical Provisions	50
c)	Solvency II Best Estimate VS Financial Statement Reserves	52
d)	Application of the Matching Adjustment	52
e)	Application of the Volatility Adjustment	52

f)	Application of the Transitional Risk-Free Interest Rate-Term Structure	52
g)	Application of the Transitional Deduction	52
h)	Recoverables from Reinsurance Contracts	53
3.	Other Liabilities	54
4.	Alternative Methods for Valuation	56
5.	Any other information	57
E	Capital Management	58
1.	Own Funds	58
a)	Objectives / Policies / Processes for Managing Own Funds	58
b)	Own Funds by Tier	59
c)	Own Funds Eligible to Cover SCR	60
d)	Own Funds Eligible to Cover MCR	60
e)	Differences between Equity in Financial Statements and Basic Own Funds	60
f)	Own Funds Items subject to Transitional Arrangements	61
g)	Ancillary Own Funds	61
h)	Restrictions on Own Funds	61
2.	Solvency Capital Requirement and Minimum Capital Requirement	62
a)	Amount of SCR and MCR	62
b)	Amount of SCR by Risk Modules	62
c)	Simplified Calculations and / or Company Specific Parameters	62
d)	Undertaking Specific Parameters (USPs) and / or Capital Add-Ons	62
e)	Amount of Capital Add-Ons	62
f)	Inputs for MCR	63
g)	Loss-Absorbing Capacity of Deferred Taxes (LACDT)	63
3.	Use of the duration-based equity risk sub-module in the calculation of the Solvency Capital Requirement	64
4.	Differences between the standard formula and any internal model Information	65
5.	Non-compliance with the Minimum Capital Requirement and non-compliance with the Solvency Capital Requirement	66
6.	Any other information	67
	Appendix I: Glossary	68
	Appendix II: LPINS Related parties	69
	Appendix III: Quantitative Reporting Templates (“QRTs”)	70
1.	S.02.01.02	71
2.	S.05.01.02	73
3.	S.05.02.01	75

4.	S.12.01.02	77
5.	S.17.01.02	78
6.	S.19.01.21	79
7.	S.23.01.01	81
8.	S.25.01.21	82
9.	S.28.01.01	83

Executive Summary

This Solvency and Financial Condition Report (“SFCR”) has been prepared in line with the requirements of the Solvency II (“SII”) Regulations, to assist clients of Euro Insurances DAC (“the Company” or “LPINS”) and other stakeholders in understanding the nature of our business, how it is managed, and its solvency position.

The structure of the SFCR follows the requirements set forth in Annex XX of the Delegated Acts and consists of the following sections: (A) Business and Performance, (B) System of Governance, (C) Risk Profile, (D) Valuation for Solvency II Purposes and (E) Capital Management.

a) Summary Section A: Business and Performance

The Company is a wholly owned subsidiary of LeasePlan Corporation NV, Gustav Mahlerlaan 360, 1082 ME Amsterdam.

The Company insures / reinsures the motor damage and third-party liability risks of LeasePlan companies and third party clients, providing motor own damage risk services to these companies and cover for ancillary motor and leasing related risks. The Company operates on a freedom of services (“FoS”) basis, primarily into European markets.

The Company’s profit after tax for the financial year 2021 was €61.9m. The following table summarises the financial performance of the Company for the reporting period ending 31 December 2021:

Financial Performance as at 31st December 2021 (€'000)	
	Amount
Underwriting Performance	82,712
Investment Performance	(2,414)
Expected Credit Loss	(6)
Other Income and Expenses	(9,505)
Net Profit before Tax	70,787
Unrealised investment gains	0
Comprehensive Income	70,787
Corporation Tax	(8,915)
Comprehensive Income after Tax	61,872

The Company achieved underwriting income of €82.7m, net investment income of -€2.4m and incurred other income and expenses not related to the underwriting or investment income of €9.5m.

The result for 2021 reflects strong performances in a significant number of jurisdictions (including Portugal, Spain, Netherlands and France), positive claims experience due to lower claims frequency driven by reduced driving activity during the COVID-19 period and some positive claims runoff.

In 2021, the Company continued to grow the insurance portfolio in existing programs and a small number of new insurance programs were deployed across various territories.

There was a negative return on investments in 2021. This loss was greater than in 2020 but in line with expectations. Overhead costs were higher in 2021 than the overhead costs in 2020 due to higher staff costs driven by increased headcount. The Company continued to invest in strengthening key processes and projects.

LPINS does not provide insurance in Ukraine, Russia or Belarus. The expectation is that the current Ukrainian conflict should not have any material direct impact on LPINS' business. Management will continue to monitor the situation, including indirect impacts.

Refer to [Section A](#) for further detail relating to business and performance.

b) [Summary Section B: System of Governance](#)

The Board's responsibility includes ensuring that an appropriate System of Governance is in place throughout the Company. To discharge this responsibility, the Board has established frameworks for risk management and internal control using the "Three Lines of Defence" model, as follows:

- **1st Line of Defence (Business Operations):** Business management is responsible for the identification and assessment of risks and the implementation and enforcement of controls.
- **2nd Line of Defence (Oversight & Challenge):** Board Sub-committees and Control Functions provide key oversight of activities in business operations and challenge the completeness/accuracy of risk identification, assessment and controls.
- **3rd Line of Defence (Independent Assurance):** Internal Audit provides independent and objective assurance on the robustness of the Risk Management System, and the appropriateness and effectiveness of internal controls.

In addition, the Company has adopted a Fit and Proper Person Policy and operates a Code of Conduct for all staff. In particular, all persons performing Control Functions (CFs) must be competent and capable as demonstrated through qualifications, having obtained appropriate skills, sound knowledge of the Company's business, understanding of the applicable regulatory and legal environment and compliance with the Central Bank of Ireland's Minimum Competency Requirements where applicable. The Company also operates a range of controls over its outsourcing.

Management considers the Company to have a robust system of governance based on the nature, scale and complexity of its operations.

Refer to [Section B](#) for further detail on the Company's system of governance.

c) [Summary Section C: Risk Profile](#)

The Company's risk landscape comprises, at a minimum, underwriting risk, market risk, credit risk, operational risk and liquidity risk that arise as a result of doing business. These risks are assessed within the Company using an entity level assessment conducted by the management team, process

level assessments conducted by process owners and a strategic risk assessment conducted by the Board Risk Committee.

For those risk types managed through the holding of capital, the company measures and monitors the risk profile on the basis of the Solvency Capital Requirement ("SCR"). A summary of the Company's SCR by primary risk type at 31 December 2021 is set out below (please note that the diversification benefit explains the summation of the individual components exceeding the overall requirement):

€'000	LPINS Capital Requirements
Market risk	27,095
Counterparty default risk	15,616
Non-life underwriting risk	92,556
Health Underwriting Risk	39,105
Operational risk	7,578
Life underwriting risk	879
LACDT*	(15,608)
SCR	113,857

*where LACDT is the Loss Absorbing Capacity of Deferred Taxes

The Company's largest risk charge is for non-life underwriting risk. This charge represents the risk associated with the writing of insurance business and the settling of claim provisions. Underwriting risk is mitigated through a combination of geographical diversification, underwriting key risk indicators, risk appetite statements and a process-level risk and control self-assessment to assess, monitor and report upon underwriting risk. This risk is also mitigated through the purchase and use of reinsurance.

Although no additional capital is deemed necessary to cover other risks including liquidity risks, the position regarding the need to hold capital in respect of liquidity (and other) risks is regularly monitored while, at the same time, a number of mitigating actions relevant to liquidity risk are in place including performing daily and monthly cash flow forecasts to monitor liquidity positions, performing daily monitoring of bank accounts against the monthly cash flow forecast and short matching assets to cover some longer tail technical reserve payment requirements.

Refer to [Section C](#) for further details on the Company's risk profile.

d) Summary Section D: Valuation for Solvency Purposes

Assets, technical provisions and other liabilities are valued in the Company's Solvency II Balance Sheet according to Solvency II regulations. The principle that underlies the valuation methodology for Solvency II purposes is that assets and liabilities are valued at the amount for which they could be exchanged, transferred, or settled by knowledgeable and willing third parties in an arm's length transaction – often referred to as the "market consistent" value of assets.

The following table presents a summary of the Solvency II valuation of assets and liabilities compared to the Statutory Accounts as at 31 December 2021:

Comparison of valuation of assets and liabilities under Solvency II vs Statutory Accounts as at 31st December 2021 (€'000)		
	Solvency II	Statutory Accounts Valuation
<i>Assets</i>		
Total Assets	612,812	680,961
<i>Liabilities</i>		
Technical Provisions	283,630	358,939
Other liabilities	70,353	75,783
Total Liabilities	353,983	434,722
Excess of assets over liabilities	258,829	246,239

The main differences between the valuation bases, methods and assumptions used by the Company in the two reporting bases are outlined in [Section D](#).

e) Summary Section E: Capital Management

The strategic objectives of capital management within the Company are to ensure regulatory compliance including maintaining adequate levels of capital, to maintain sufficient liquidity, to manage and allocate capital efficiently, and finally to ensure that all of the above objectives are consistent with the continuation of profitable business in line with Company Strategy.

The following table compares the solvency position of the Company, which is assessed using the Standard Formula at 31 December 2021 to the position at 31 December 2020:

LPINS Solvency Position (€'000)	At December 2021	At December 2020
Eligible Own Funds	258,829	244,291
Solvency Capital Requirement	113,857	104,960
SCR Coverage	227%	233%
Minimum Capital Requirement	39,949	40,664
MCR Coverage	648%	601%

All of the Company's own funds are classified as Tier 1 and are available to cover the SCR and the MCR.

There were no instances of non-compliance with the MCR and the SCR during the reporting period.

Refer to [Section E](#) for further details on the Company's capital management.

f) **Summary: Material Changes over the Reporting Period**

This report relates to the financial year ending 31 December 2021. During the year there were no material changes to the areas set out in sections A to E above. Please refer to Section A for significant events over the period.

A Business and Performance

1. Business and External Environment

a) Name and Legal Form

Euro Insurances DAC, trading as LeasePlan Insurance, has its office address at LeasePlan House, Ground Floor, Central Park, Leopardstown, Dublin 18, Ireland.

The Company had 57 FTEs as at 31 December 2021.

b) Supervisor and External Auditor

The Central Bank of Ireland ("CBI") is responsible for financial supervision of the Company.

The CBI's address is Central Bank of Ireland, New Wapping Street, North Wall Quay, PO Box 559, Dublin 1, Ireland.

The Company's external auditors are KPMG Ireland with an address at 1 Harbourmaster Place, International Financial Services Centre, Dublin 1, Ireland.

The Company's financial year end is 31 December each year and the Company reports in Euro.

c) Position within the Group

The Company is a wholly-owned direct subsidiary of LeasePlan Corporation N.V., with an address at Gustav Mahlerlaan 360, 1082 ME, Amsterdam, The Netherlands.

LeasePlan Corporation N.V. is indirectly owned by a consortium of the following six investors:

- ADIA: Since 1976, the Abu Dhabi Investment Authority (ADIA) has been prudently investing funds on behalf of the Government of Abu Dhabi, with a focus on long-term value creation. ADIA manages a global investment portfolio that is diversified across more than two dozen asset classes and subcategories, including quoted equities, fixed income, real estate, private equity, alternatives and infrastructure.
- ATP: ATP was established in 1964 and is Denmark's largest pension fund and one of Europe's largest pension funds.
- Broad Street Investments: A Singapore based Holding company.
- GIC: GIC is a leading global investment firm with well over US\$100 billion in assets under management. Established in 1981, the firm manages Singapore's foreign reserves and is positioned for long-term and flexible investments across a wide range of asset classes, including public equities, fixed income, real estate, and private equity. In private equity, GIC invests through funds as well as directly in companies, partnering with fund managers and management teams to help businesses achieve their objectives. GIC employs more than 1,300 people.

- PGGM: PGGM is a cooperative Dutch pension fund service provider. Institutional clients are offered: asset management, pension fund management, policy advice and management support. Either alone or together with strategic partners, PGGM develops innovative products by linking together pension, care, housing and work.
- TDR Capital: TDR Capital LLP is a highly selective private equity firm with a track record of investing in businesses. TDR Capital LLP was founded in 2002 and currently manages funds totalling over €8 billion on behalf of a range of sophisticated investors.

The Company does not have any subsidiaries or branches.

d) Material Lines of Business and Geographical Areas

The Company insures / reinsures the motor damage and third-party liability risks of LeasePlan companies and third-party clients. In addition, it provides cover for ancillary motor and leasing related risks.

The Company mainly deals with LeasePlan entities in Europe under the freedom of services model. As the company's business is predominately in relation to the leased vehicle fleets of its leasing affiliates, the Company's business is predominately with related parties, including related party policyholders, intermediaries and service providers. The Company's related parties during 2021 included the entities set out in Appendix II.

e) Significant Events over the Period

During 2021 the COVID-19 pandemic continued to cause disruption in the global economy. In response to this pandemic, numerous governments imposed various levels of restrictions on movement and closed sections of their economies. These restrictions led to reduced numbers of road users and mileage driven. As a result, the Company observed a reduction in claims frequency on its primary products, TPL and OD. This has had a corresponding positive impact on the Company's profits. During 2021 employees of the Company worked from home as appropriate in compliance with government requirements. During this period, the Company actively engaged with employees to manage any potential impact of COVID-19 on their health and productivity.

IFRS 17 "Insurance Contracts" is a new accounting standard for insurance contracts, issued by the International Accounting Standards Board. The standard will be effective from 1 January 2023. IFRS 17 will replace IFRS 4, the current IFRS accounting standard for insurance contracts. LPINS will be required to fully comply with the IFRS 17 standard when it comes into effect. Reporting under IFRS 17 will require updates to the internal processes and systems used for reporting at LPINS. A project, involving a multidisciplinary team, is currently underway to ensure the requirements of the standard are met by the effective date.

2. Underwriting Performance

a) Underwriting Performance by Material Line of Business / Geographical Area

The Company insures / reinsures the motor damage and third-party liability risks of LeasePlan companies and third-party clients. In addition, it provides cover for ancillary motor and leasing related risks.

Please find below an overview of underwriting income by geographical area:

Underwriting Income by Geographical Region (€'000)		
Region	2021	2020
Central Europe (Belgium, France, Austria, Germany, Luxembourg)	10,198	12,672
Eastern Europe (Czech Republic, Poland, Hungary, Romania, Slovakia)	18,453	14,318
Northern Europe (Norway, Netherlands, Denmark, Sweden, Finland, Ireland, United Kingdom)	18,269	17,818
Southern Europe (Italy, Spain, Portugal, Greece)	33,279	34,644
Rest of the world (Australia, New Zealand)	2,513	1,128
Total	82,712	80,580

During 2021 the overall underwriting income increased by €2.1m to €82.7m:

During 2021 the COVID-19 pandemic continued to cause disruption in the global economy and numerous governments continued to impose various levels of restrictions on movement and closed sections of their economies. These restrictions led to reduced numbers of road users and mileage driven. As a result, the Company continued to observe lower claims frequency on its primary products (TPL and OD) than normal. The overall performance was generally in line with 2020. However, LPINS did see an uplift in Catastrophe ("CAT") claims and there were several significant claims movements.

- The drop in the Central Europe result was mainly driven by a deterioration in the own damage programs in Germany. All other countries were broadly in line with 2020.
- The Eastern region result for 2021 shows an uplift of €4.1m. There were strong results for Czech Republic & Romania.
- The underwriting income in Northern Europe is in line with the income for 2020. A strong performance in the Netherlands is offset by lower results compared to 2020 in certain other jurisdictions.
- In Southern Europe, the on-going lower claims frequency due to the COVID pandemic has delivered a strong result in Portugal. This result is offset by lower results in Italy, Spain & Greece.
- The Company has provided reinsurance cover to LeasePlan Australia & LeasePlan New Zealand fleets via a fronting arrangement for many years. In 2020, the provider of this fronting structure confirmed that it could no longer support the model. Therefore, with effect from 1st December

2020, both LeasePlan Australia and LeasePlan New Zealand placed their insurance book in the local market. The 2021 result relates to the run-off of these books.

The underwriting income figures above exclude overhead expenses and investment income.

Please find below an overview of underwriting income by line of business:

Underwriting Income by SII Line of Business (€'000)		
Line of Business	2021	2020
Income protection	6,481	8,638
Motor vehicle liability	40,416	40,193
Other motor	22,326	18,723
Fire and other damage	393	200
Legal expenses	856	1,135
Assistance	1,543	1,025
Miscellaneous financial loss	8,184	9,538
Other motor (proportional reinsurance)	2,513	1,128
Total	82,712	80,580

During 2021 the overall underwriting income increased by €2.1m to €82.7m:

- There were reductions in underwriting income for the income protection (€2.16m) and miscellaneous financial loss (€1.35m) lines of businesses.
- The Underwriting income for the Motor Vehicle Liability line of business for 2021 is in line with the 2020 income. The lower claims frequency experienced in 2020 continued into 2021.
- The Other Motor line of business saw a significant increase of €3.6m in underwriting income compared to the 2020 year. This result is driven by the continuing growth in the Own Damage programmes in a number of countries and the lower claims frequency driven by the change in driver behaviour during the Covid period.
- Other motor (proportional reinsurance) shows an increase in underwriting income of €1.4m from 2020 to 2021. LPINS' fronting arrangement in Australia & New Zealand ended at the end of November 2020 and the result is driven by releases in reserves.
- The underwriting income figures above exclude overhead expenses and investment income.

3. Investment Performance

a) Investment Performance by Asset Class

At the end of 2021, the Company holds €504.2m (2020 €477.5m) in investments as valued on an IFRS basis. The net investment loss relating to deposits during 2021 was -€2.408m. The net investment income relating to bonds was €63k.

During the reporting period interest rates on deposits continued to deteriorate and this had a negative impact on the investment return for the financial period. There are no management or transaction costs associated with the placement of the deposits.

The company also holds a selection of bonds, which incur management charges. At the end of 2021, the Company held c.€53.4m in sovereign and corporate bonds. The Company increased the bond holdings by €20m in 2021 and plans to continue with the gradual expansion of the bond portfolio in coming years.

The Company holds a bond portfolio from counterparties with a minimum credit rating of investment grade for an individual holding and a target rating for the overall Bond Portfolio of A-, as issued by Standard and Poor's for corporate bonds and Moody's for Government bonds. In addition, the Company has c.€10m in bonds issued by LeasePlan N.V. (S&P rating of BBB-).

The following table compares the Company's investment performance in 2021 with that in 2020:

LPINS Investment Performance (€'000)		
	2021	2020
Deposits & Bonds		
<i>Investment Income</i>	(2,345)	(1,414)
<i>Deposits</i>	(2,408)	(1,494)
<i>Bonds</i>	63	80
<i>Gains/Losses</i>	0	0

The Bonds are valued on an amortised cost basis under IFRS with an IFRS 9 adjustment for Expected Credit Loss. No valuation gains or losses are recognised in the profit and loss or equity. Under Solvency II, the bonds are valued at their market value and any changes in this value will impact the level of assets held by the Company.

b) Investments in Securitisations

The Company holds all funds in deposits, in cash accounts or in bonds. Therefore, the Company does not hold any securitised investments.

4. Performance of other activities

a) Description of Other Material Income / Expenses

The Company had foreign exchange losses in 2021 of €69k (2020 loss of €1k). Operating Expenses for 2021 were €16m (2020 €17.3m).

LPINS - Performance of Other Material Income/Expenses (€'000)		
	2021	2020
Foreign Exchange Gains/Losses	(69)	(1)
Operating Expenses	(16,015)	(17,287)

Foreign currency transactions are translated into the functional currency utilising the exchange rates prevailing at the date of these transactions. Foreign exchange gains and losses resulting from the settlement of such transactions, and from the translation at year-end exchange rates of monetary assets and liabilities denominated in foreign currencies, are recognised. The Company completes a review of the net assets and liabilities in foreign currencies on a monthly basis and reduces any material exposure. The Company does not engage in foreign exchange trading.

Overhead Expenses for 2021 were €9.5m (2020 €8.2m). In 2021 overhead was €1.3m higher than the previous year. The uplift in overhead was mainly due to an increase in staff related costs driven by an uplift in number of employees. The Company continued to invest in strengthening key processes and projects.

Refer to section D.3 of this report for details on operating leases recognised by the Company.

5. Any other information

LPINS does not provide insurance in Ukraine, Russia or Belarus. The expectation is that the current Ukrainian conflict should not have any material direct impact on LPINS' business. Management will continue to monitor the situation, including indirect impacts.

The Company has no other disclosures to make in respect of the Company's Business and Performance.

B System of Governance

1. General Information on the System of Governance

a) Board and Sub-Committee Structure

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

The Company's Board of Directors carry responsibility for the oversight of the business and sets its strategy and risk appetite. At year-end 2021 the Board comprised the following:

- Board of Directors:
 - J. Sutor, Chairman (Group Non-Executive Director)
 - G. Stoelinga, (Group Non-Executive Director)
 - G. Owens (Non-Executive Director)
 - A. O'Donnell (Independent Non-Executive Director)
 - S. Fay (Independent Non-Executive Director)
 - V. McMullan (Executive Director)
- Company Secretary:
 - M. Clarke

In March 2021, J. Sutor was appointed to the Board as a Group Non-Executive Director and in July 2021 he became Chairman of the Board. G. Stoelinga resigned from the Board in March 2022.

The Board has established a Board Risk Committee and an Audit Committee to assist it in discharging its obligations. The Board Risk Committee comprises all members of the Board. At year-end 2021, the Audit Committee comprised A. O'Donnell (Chairman), S. Fay and G. Owens. Each Committee operates under defined terms of reference and reports to the Board.

The Company is committed to high standards of corporate governance. The Company has appointed an independent Head of Actuarial Function and the Board has completed an annual review of governance and its committee structures in line with the Corporate Governance Requirements for Insurance Undertakings. During the financial year to 31 December 2021, the Board met on ten occasions, the Audit Committee met on five occasions and the Board Risk Committee met on five occasions.

The Audit Committee exercises oversight over the Company's Internal Control System and the Board Risk Committee exercises oversight over the Company's Risk Management System.

The Audit Committee assists the Board in discharging its responsibilities in relation to:

- a) The integrity of the Company's financial statements,
- b) The effectiveness of the Company's compliance and internal controls,

- c) The Solvency II Actuarial Function including Actuarial Opinion on Technical Provisions,
- d) The effectiveness of the Company's Internal Audit function, and
- e) Monitoring the effectiveness, independence and objectivity of the external auditor.

The Board Risk Committee assists the Board in discharging its responsibilities in relation to:

- a) The implementation and effectiveness of the Company's Risk Management System,
- b) The timely reporting of material deviations from defined risk appetite,
- c) Reviewing the risk profile of the Company and monitoring the key risks it faces,
- d) Monitoring the performance of outsourced providers, and
- e) The Own Risk and Solvency Assessment (ORSA).

There were no material changes in the Company's system of governance during the year.

b) Remuneration Policy and Practice

The Company's Board has adopted a Remuneration Policy. The aim of the policy is to ensure that the Company's remuneration practices do not encourage excessive risk taking, to promote sound and effective risk management and to ensure that the Company's Remuneration Framework is in line with its values and long-term interests. The Company's Remuneration Policy adopts the Group Remuneration Framework of its parent company, LeasePlan Corporation N. V. The LeasePlan Group Remuneration Framework aims to attract, retain, motivate and reward high-calibre employees to deliver first rate long-term business performance in line with business strategy and approved risk appetite.

LeasePlan Corporation is a Dutch ECB and DNB regulated credit institution, and, as a result, the LeasePlan Group Remuneration Framework adopts the remuneration rules applicable to Dutch credit institutions. These rules comprise CRD IV and the Dutch Banking Code, the Regulation on Sound Remuneration Policies pursuant to the Financial Supervision Act 2014, the Dutch Act on Remuneration Policies for Financial Enterprises (Wbfo) and Book 2 of the Dutch Civil Code. The Company, through its Remuneration Policy and the LeasePlan Group Remuneration Framework, is subject to these remuneration rules. In addition, the Company's Remuneration Policy applies the Central Bank of Ireland Guidelines on Variable Remuneration Arrangements for Sales Staff.

In accordance with the Company's Remuneration Policy and the LeasePlan Group Remuneration Framework the following remuneration principles apply to all Company staff:

- a) Variable remuneration is performance-related, consists of a mix of financial (maximum 50%) and non-financial elements and reflects both short-term and long-term strategic goals;
- b) Variable remuneration targets are specific, measurable, attainable, relevant and time-bound;
- c) Variable remuneration in principle cannot exceed 100% of fixed remuneration;
- d) Other benefits for staff are provided in line with market practice; and
- e) Clawback and malus provisions are applicable to all variable remuneration awarded.

The Company's Remuneration Policy seeks to prevent the taking of more risk than is acceptable under the Company's risk appetite framework. Remuneration plans reward performance at group, company and individual level as appropriate. Individual objectives include a combination of financial and non-

financial targets, taking into account ethical behaviour and corporate responsibility. Variable remuneration plans are underpinned by performance management systems in order to reinforce a performance culture.

The Company does not offer share options or shares to staff or Board members. The Company operates a defined contribution pension scheme which is open to all qualifying employees. Non-executive members of the Board do not participate in the scheme. Certain non-executive members of the Board receive remuneration from the Company in respect of their Board membership.

c) **Material Transactions with Connected Persons**

The Company is a wholly owned direct subsidiary of LeasePlan Corporation N.V. The majority of the Company's business is intra-group, meaning that the Company predominately writes insurance in connection with the motor fleet leasing and management activities of its affiliates within the LeasePlan Group. Many of the Company's policyholders, intermediaries, claim handlers and other service providers are subsidiaries of LeasePlan Corporation N.V. and some of the Company's bank deposits and bonds are with LeasePlan Corporation N. V. During the reporting period the Company continued and/or entered into such transactions in the normal course of its business. The Company paid a dividend of €50m to LeasePlan Corporation N. V. in October 2021.

The Company did not enter into material transactions with members of the Board or persons who exercise a significant influence on the Company.

2. Fit and Proper Requirements

The Company has adopted a Fit and Proper Person Policy and operates a Code of Conduct for all staff. The Company's Fit and Proper Person Policy applies the requirements of the Central Bank of Ireland's Fitness and Probity Standards ("the Standards") and the Company complies with same. Persons who hold control functions, including key functions known as Pre-Approval Control Functions (PCFs), are subject to assessment and due diligence in accordance with the policy. The Company assesses the fitness and probity of such persons prior to their assumption of the control function concerned. The fitness and probity of the holders of control functions is subject to ongoing monitoring. All persons performing Pre-Approval Control Functions must be competent and capable. The Company requires this to be demonstrated through professional or other qualifications, having obtained appropriate skills, demonstrating a sound knowledge of the Company's business, demonstrating an understanding of the applicable regulatory and legal environment and, where applicable, compliance with the Central Bank of Ireland's Minimum Competency Requirements.

The Company's Fit and Proper assessment process comprises an application form, certification, evidence of professional qualifications, evidence of continuing professional development where relevant, interview, references, record of previous experience, concurrent responsibilities and evidence of compliance with the Minimum Competency Requirements where relevant.

The Company's assessment process also includes probity and financial soundness due diligence which includes completion and signature by the individual of the Company's Probity and Financial Soundness Declaration and background checks and searches as prescribed in the Central Bank of Ireland Fitness and Probity Requirements. Following this due diligence, the Company's Fitness and Probity Committee completes, documents and signs the assessment. In addition, for PCFs the Company's Board performs an assessment and an on-line application is made to the Central Bank of Ireland and the Company certifies as to the outcome of its prior assessment. The proposed holder of a PCF may only commence in his/her role following receipt of approval by the Central Bank of Ireland. The Company requires PCF holders to certify annually as to their compliance with the Fitness and Probity Standards and confirm that information provided previously remains accurate.

3. Risk Management System including the Own Risk and Solvency Assessment

a) Risk Management System

The Company's Risk Management System includes clearly defined risk management objectives, written policies for the material risks faced by the Company, a Risk Management Framework to identify, assess, manage, monitor and report on risks and an Own Risk and Solvency Assessment (ORSA) process.

The Company's Risk Management Strategy takes account of the Company's business strategy and seeks to monitor and manage the risks associated with the implementation of the business strategy.



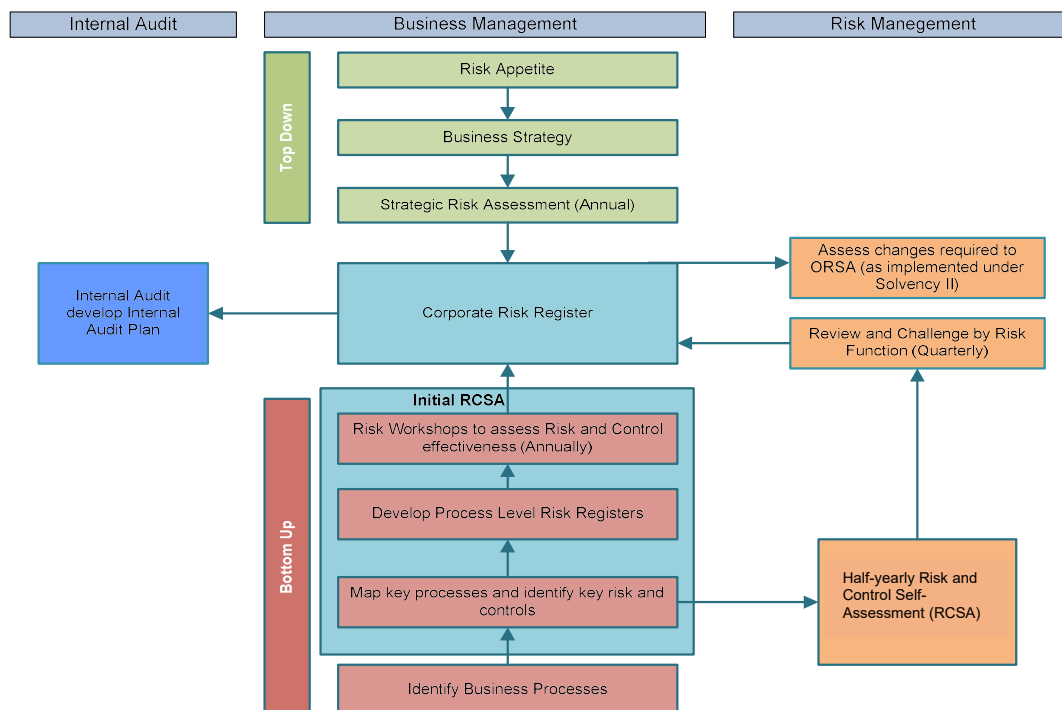
The main objective of the Company's Risk Management System is to ensure that all significant risks are identified, assessed, monitored and controlled within the agreed risk appetite. The framework ensures that the risk management process is explicit and facilitates effective oversight and challenge. Risk control procedures and systems seek to manage, rather than eliminate, the risk of failure to meet business objectives. The Company's Risk Management Framework includes the following processes:

- a) Risk Appetite setting and monitoring;
- b) Company level Enterprise Risk Assessment;
- c) Process level Risk and Control Self-Assessment;
- d) Board level Strategic Risk Assessment; and
- e) Risk Reporting.

The Company in these processes has adopted the 'Risk Control Cycle' in order to identify, assess, manage, monitor and report on the risks to which it is exposed:



The following diagram describes how the Company's Risk Management System is integrated into the Company's organisational structure and decision-making processes.

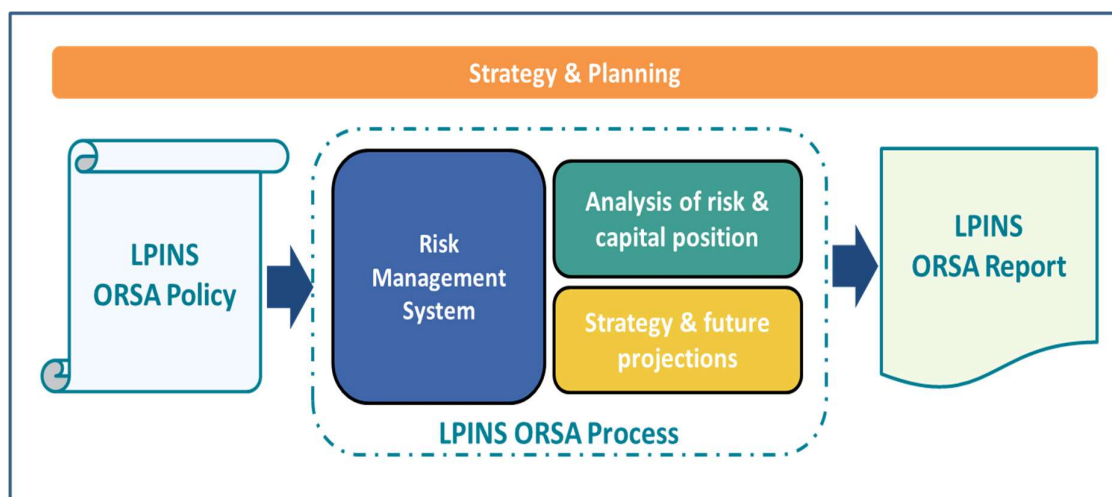


There were no gaps identified in the Risk Management System during the reporting period.

b) Own Risk and Solvency Assessment

The Company's Risk Management System includes the conduct of an Own Risk and Solvency Assessment ("ORSA") at least annually and more often in the event of a material change in the Company's risk profile. During the reporting period the Company conducted one scheduled ORSA. No material change occurred necessitating the performance of an ad hoc ORSA during the reporting period.

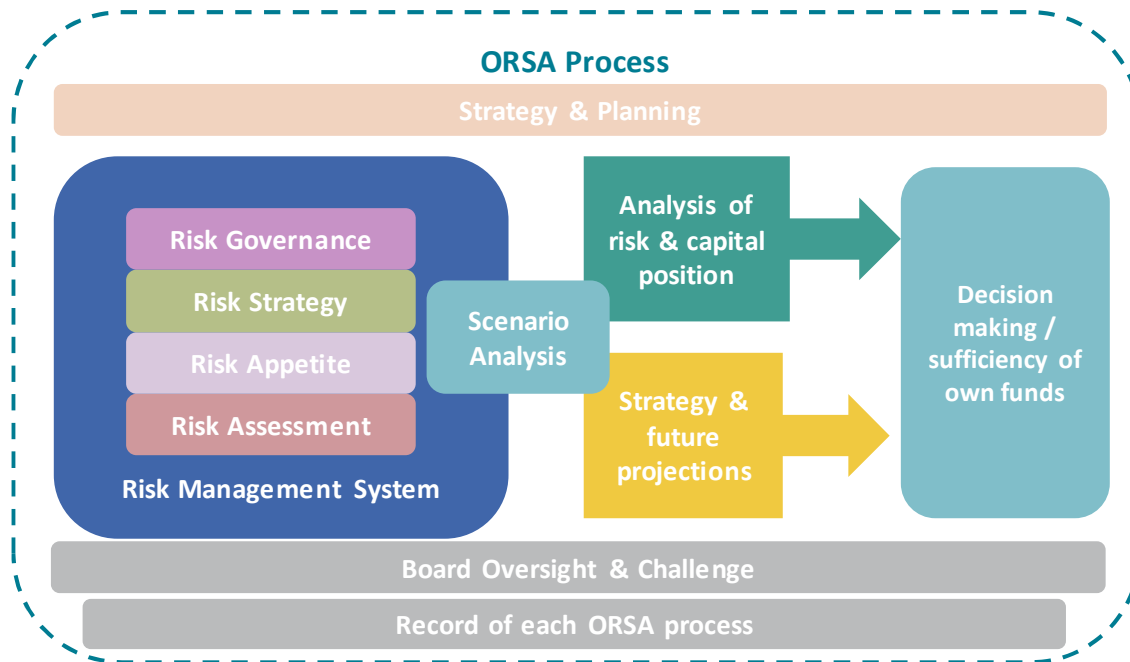
The Company uses its ORSA process to consider its risk exposures and capital requirements over the business planning timeframe. This acts as a key input into the Company's strategic decision making and business planning process. The Company's ORSA assesses risks inherent in its business and determines its corresponding capital needs whilst taking into consideration its risk profile, approved risk tolerance limits and business strategy. The Company's ORSA process comprises the following steps:



The Company's ORSA process is a circular process that relies on key elements of the business:

- a) Board strategy, policies and plans;
- b) The Solvency II Pillar I Balance Sheet standard model results, and base assumptions used;
- c) The Risk Management System and its outputs, which identifies the key risks;
- d) The Board Risk Committee which reviews, challenges and approves the test scenarios including the ORSA output;
- e) The Actuarial Department which runs the tests on the Balance Sheet for capital adequacy and produce the resultant output;
- f) The Risk Function, Actuarial Department and management which assess the outputs and prepare the reports;
- g) The Actuarial Function which provides its opinion on both the ORSA input stress tests and resultant outputs;
- h) The Board Risk Committee and Board's assessment of the output and resultant capital, strategy and risk appetite review; and
- i) ORSA reporting to the Central Bank of Ireland.

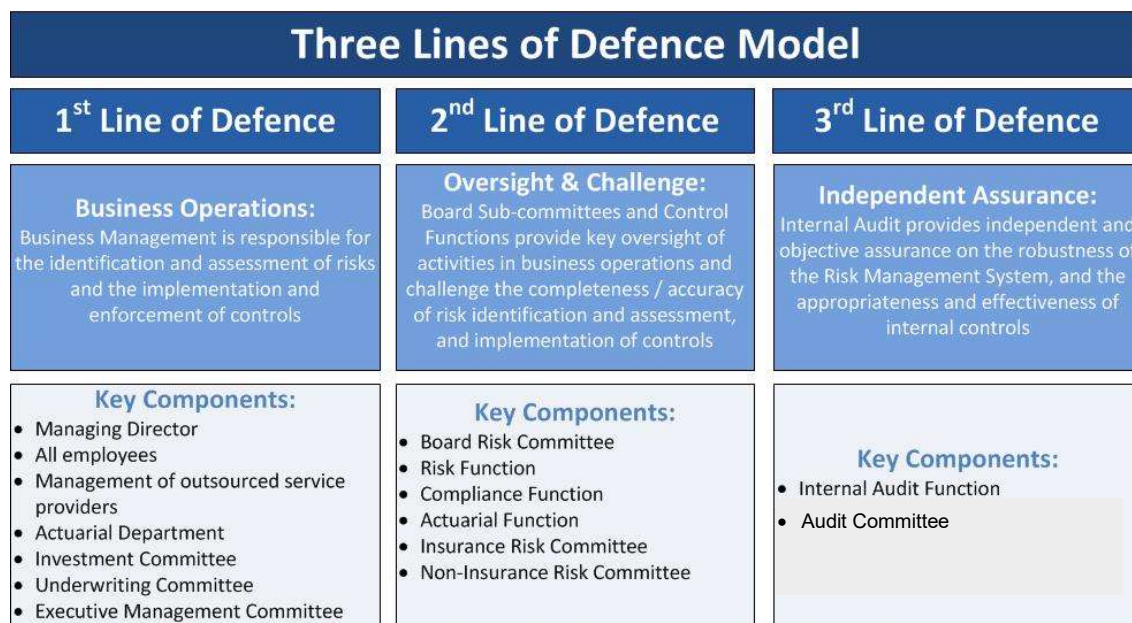
In its ORSA the Company uses, as a base, the Solvency II Standard Formula Model to calculate the required solvency capital but also considers a number of "non-quantifiable" risks when assessing its own solvency needs. The results are subjected to a range of scenario and stress tests that are reviewed by management and challenged by the Board and, where appropriate, potential management actions are noted and conclusions drawn. The following diagram depicts the ORSA process in greater detail. It shows that stress and scenario tests are used in conjunction with the assessment of risk and capital to facilitate decisions about the adequacy of the Company's own funds.



ORSA assessments to date indicate that the Company is adequately capitalised.

4. Internal Control System

The Company's Internal Control System consists of five interrelated components, namely control environment, risk assessment, control activities, reporting, and monitoring. The Company's Internal Control System adopts the "Three lines of Defence" model as set out in the following diagram.



The Company's Internal Control System and Internal Control Policy set out the role of each of the first line of defence functions in respect of business operations, the second line of defence functions in relation to oversight and challenge and the third line of defence functions in relation to independent assurance.

The Actuarial Function is the second line of defence and operates independently of both the first line (responsible for determining the technical provisions, reinsurance and underwriting) as well as the other three key functions (internal audit, risk management and compliance).

a) Compliance Function

The Company's Compliance Function, led by the Compliance Manager, operates in accordance with the Company's Compliance Policy. The Compliance Function forms part of the second line of defence within the Company's Internal Control System. The primary activities of the Compliance Function comprise:

- Identification of compliance obligations;
- Development and delivery of an annual compliance plan and report;
- Training and education;
- Advice on compliance matters;
- Incident management and reporting;
- Liaison with the Central Bank of Ireland and other regulators; and
- Reporting, including to the Audit Committee.

The activities of the Compliance Function are subject to periodic audit by Internal Audit.

5. Internal Audit Function

The Company outsources its Internal Audit Function to the Group Audit Department of LeasePlan Corporation N. V. in accordance with the Company's Outsourcing Policy. The Function operates in accordance with the Company's Internal Audit Policy and the LeasePlan Corporation Internal Audit Charter which have been approved by the Board. The policy is reviewed and updated on an annual basis and more frequently if required.

The Company's Internal Audit Function is independent from business units and forms part of the third line of defence in the Company's Internal Control System. The Company's outsourcing of its Internal Audit Function to its parent company assists in preserving the independence and objectivity of the function as the function comprises no staff of the Company. The Company and its Internal Audit Function subscribes to the Institute of Internal Auditors definition of internal audit which requires "independent, objective, assurance". The Company's Internal Audit Policy sets out the measures taken by the Company and the Internal Audit Function to maintain ongoing independence including audit staff rotation.

The Internal Audit Function conducts an internal audit of the Company at least annually. Internal Audit findings and recommendations are reported to the management body who are required to respond to those findings and recommendations.

The Internal Audit Function, via LeasePlan Corporation's Senior Vice President of Internal Audit, reports to the Audit Committee of the Company. The Audit Committee considers audit plans, audit reports, resourcing and performance.

6. Actuarial Function

The Company outsources its Actuarial Function, including Head of Actuarial Function, to an actuary and Central Bank approved Head of Actuarial Function within a Big Four accounting firm in accordance with the Company's Outsourcing Policy. The Function operates in accordance with the Company's Actuarial Function Terms of Reference. The Company's Actuarial Function forms part of the second line of defence in the Company's Internal Control System.

The Company's Actuarial Function has the following key responsibilities:

Technical Provisions

- Coordination of calculation of technical provisions including the Actuarial Function Report on Technical Provisions ("ARTP");
- Review of appropriateness of methodologies and assumptions;
- Review of data sufficiency and quality; and
- Experience analysis.

Opinions

- Delivery of Actuarial Opinion on Technical Provisions ("AOTP") following analysis conducted for the ARTP;
- Delivery of Opinion on the Company's Underwriting Policy;
- Delivery of Opinion on the Company's Reinsurance arrangements; and
- Delivery of Opinion on the Company's ORSA.

Risk Management

- Contributing to the effective implementation of the Risk Management System, in particular with regard to the Solvency Capital Requirement ("SCR") and Minimum Capital Requirement ("MCR"); and contributing to the Own Risk and Solvency Assessment ("ORSA") process.

7. Outsourcing

The Company operates an Outsourcing Policy which is approved by the Board Risk Committee and adopted by the Board. The Outsourcing Policy outlines the Company's policy with regard to the outsourcing of critical or important functions or activities ("Core Outsourcing") which are essential to the operation of the Company. The Company's Outsourcing Policy outlines the roles and responsibilities, procedures, approval requirements, monitoring and reporting requirements applicable to Core Outsourcing.

As the Company is part of the LeasePlan group, much of the Company's outsourcing is to other group entities. The Company's Core outsourced activities comprise:

Core Activity	Description	Jurisdiction of Service Provider
Claims Handling	Provision of claim handling activities on behalf of the Company (some claims handling activities may not constitute critical or material outsourcing and therefore some claim handlers may not be in scope).	Various EEA jurisdictions into which the Company writes insurance
Investment Management (Deposits)	Provision of treasury services to the Company.	Ireland
Data storage and systems support	Management of the platforms that host the Company's systems and data and provision of first line support to the Company.	Ireland
Internal Audit	Provision of internal audit services.	Netherlands
Actuarial Function	Actuarial Function including Head of Actuarial Function.	Ireland
System to support Solvency II Reporting	System to support Solvency II QRT Reporting to the Central Bank of Ireland.	Germany
Investment Management (Bonds)	Exercise of investment discretion within investment guidelines set by the Company.	Ireland
Fiscal representation and administration	Fiscal representation and administration activities in the countries in which the Company operates.	United Kingdom and the various EEA jurisdictions into which the Company writes insurance
Board pack hosting	Board pack hosting and related software-as-a-service.	United Kingdom (data hosted within the EEA)

8. Any other information

The Company believes that its system of governance as set out in the Company's Internal Control System, Risk Management System and Board Charter is adequate in the light of the nature, scale and complexity of the risks inherent in its business. The Company's business is monoline, namely motor and related insurances, and its business is predominately in connection with the fleet leasing and fleet management activities of its affiliate entities within the LeasePlan Group. The Company believes that its Internal Control System incorporates appropriate challenge and oversight by persons with appropriate knowledge of the Company's business. The Company believes that its Risk Management System, including ORSA, provides a sufficiently forward-looking and robust assessment of risk in the context of the Company's predominately intra-group business model. Finally, the Company believes that its corporate governance, including Board, sub-committees and management committees, provides appropriate internal review and challenge.

The Company has no other disclosures to make in respect of the Company's System of Governance.

C Risk Profile

The Company is subject to risks in the course of its business. These risks include underwriting risk, market risk, credit risk, liquidity risk and operational risk. Underwriting risk comprises mainly non-life underwriting risk; however, a certain amount of health and life underwriting risks arise incidentally from the non-life insurance contracts written by the Company. These risks comprise the company's primary material risks. These risks are assessed within the Company using an entity level assessment conducted by the management team, process level assessments conducted by process owners and a strategic risk assessment conducted by the Board Risk Committee. The Company's Risk Function, led by the Head of Risk, operates in conjunction with the Risk Function of its parent, LeasePlan Corporation.

The Company has adopted the risk mitigation techniques of its parent company where considered appropriate. The Company operates a Risk Appetite Framework based on capital usage. This capital usage-based risk appetite follows a quantitative and qualitative approach to risk appetite and is integrated with the ORSA process and the Company's business strategy. There were no material changes to the Company's risk exposure and there were no material changes to the measures used to assess same. The Company does not use special purpose vehicles and does not have exposures arising from off-balance sheet positions.

The table below gives the breakdown of the various risk charges making up the Company's SCR as calculated by the Standard Formula as at 31 December 2021. Please note that diversification benefit explains the summation of the individual components exceeding the overall requirement.

€'000	LPINS Capital Requirements
Market risk	27,095
Counterparty default risk	15,616
Non-life underwriting risk	92,556
Health Underwriting Risk	39,105
Operational risk	7,578
Life underwriting risk	879
LACDT	(15,608)
SCR	113,857

In accordance with the Company's SCR Assurance Process, between year-ends, SCR and SCR coverage ratio are monitored at least on a quarterly basis, to ensure continuous SCR compliance.

1. Underwriting Risk

a) Risk Exposure

During the year, the Company's exposure to Underwriting Risk was across 20 jurisdictions. The Company's gross written premium during the reporting period was €240.7m across all jurisdictions. Legislation, regulations, market requirements and market practices vary across these markets. Likewise, underwriting requirements and risks vary across these markets. While the Company's Underwriting Risk is diversified across multiple markets, its knowledge of individual markets is necessarily less than that of domestic insurers in those markets. The Company's Underwriting Risk Policy sets out the Company's processes for the management of Underwriting Risk. The Company uses a process-level risk and control self-assessment to assess, monitor and report upon Underwriting Risk. The Company uses key risk indicators and risk appetite statements to monitor its underwriting risk.

The Company's largest risk charge under the SCR is the Non-life underwriting risk charge. This charge represents the risk associated with the writing of insurance business and settling of claims provisions. At 31 December 2021, the Company had a non-life underwriting risk charge of €92.6m.

The company has a risk charge of €39.1m in respect of health underwriting risk owing to its personal injury business. The bulk of this charge is related to the CAT risk which does not fit very well with the LPINS business model – given that the cover normally applies to the driver when they are in or next to their vehicle meaning risk concentrations are less likely. The Company also has a small risk charge of €0.9m in respect of life underwriting risk. This risk charge relates to the longevity risk associated with Periodical Payment Orders (PPOs).

b) Risk Concentration

The Company writes various types of non-life insurance risks, including motor third party liability and motor own damage, as well as ancillary covers and leasing related risks. The Company's business is predominately sourced from within the LeasePlan Group.

The Company's business is well diversified geographically, both between countries and within countries. As a result, few underwriting risk concentrations exist. The company's premium and reserve risk is well diversified across all European regions. A risk concentration does exist in relation to natural catastrophe risk where the Company's gross SCR charge is largely driven by exposures in Italy. When reinsurance is considered, this risk concentration is largely mitigated. Thereafter, a modest level of diversification exists between product lines. The main product sold by the company is motor third-party liability insurance (LOB 4) and this is reflected in the underwriting charge being driven by the capital requirement on LOB 4. Concentration of risk is also mitigated through reinsurance.

c) Risk Mitigation

The Company's Risk Management System and related policies set out the techniques used by the Company to manage and mitigate the risk to which it is exposed. The Company uses its program of risk assessments, risk appetite monitoring and risk governance via risk committees and the Board Risk Committee to monitor the continued effectiveness of these risk mitigation techniques.

The risk mitigation techniques used by the Company to mitigate underwriting risk are set out in the Company's Underwriting Risk Policy. These include the operation of risk selection and pricing procedures, the operation of an Underwriting Committee, underwriting authorities, reinsurance,

underwriting exposure limits, escalation procedures, and reporting, including to the control functions of the Company.

In addition, reinsurance is purchased to reduce and contain the volatility of results. The level of retention in different reinsurance contracts is aligned with the size and the risk profile of the underlying portfolios. This includes taking account of the cost of reinsurance on the one hand and the risk that is retained on the other. Risk that is retained is constrained through pre-defined limits as set by the Underwriting Committee.

The Company's underwriting risk appetite and underwriting key risk indicators are used by the Underwriting Committee, Risk Committee and the Board Risk Committee to monitor the ongoing effectiveness of these risk mitigation techniques. The Underwriting Function undertakes an underwriting process level risk and control self-assessment. In addition, the Company's Business Controls Function (second line of defence) and Internal Audit Function (third line of defence) test and audit the effectiveness of the Company's underwriting processes.

d) Risk Sensitivity

A number of sensitivity tests are used to assist the Company with understanding its exposure to the volatility of the Company's more material risks. These sensitivity tests on the Company's key risk exposures help identify and quantify risks and help inform the Company's decision-making process.

The following are the sensitivity analyses carried out that impact Underwriting Risk:

- Expected loss ratios are a key assumption in the estimate of ultimate losses. As at 31 December 2021, sensitivity analyses show that an increase of 2.5% in the loss ratios used in the calculation of the premium component of the technical provisions would result in an increase in the SCR charge of €75k. In terms of SCR coverage ratio, a reduction of 3% is observed, largely due to the reduction in Own Funds.

The above stress test would have the following impact on the Company's Solvency metrics:

Scenario	Own Funds (€000s)	Solvency Capital Requirement (SCR) (€000s)	Solvency Coverage Ratio
Base scenario	258,829	113,857	227%
Increase in loss ratios of 2.5%	254,832	113,932	224%

In addition, Underwriting related stresses are included in a number of the Company's ORSA scenarios. This process helps the Company stress its Underwriting risk exposure over the business planning period including in combination with other stressed risk exposures.

2. Market Risk

a) Risk Exposure

The Company's exposure to Market Risk is predominately in relation to its investments. The Company's investments at the reporting date totalled €504.2m. The Company's investments are predominately bank deposits. As at 31 December 2021 the company held €450.8m in Deposits. Deposits with a term of greater than 7 days are subject to interest rate risk. The Company holds minor quantities of non-euro currencies for matching purposes. These are subject to foreign exchange risk.

As at 31 December 2021, the Company held €53.4m in both sovereign and corporate bonds with durations of between 1 and 5 years. As all bonds held by LPINS are denominated in Euro, they are not subject to currency risk.

The Company's Investment Risk Policy sets out the Company's processes for the management of market risk. Investment risk forms part of the Company's Finance function process-level risk and control self-assessment through which the risk is assessed, monitored and reported. During the reporting period interest rates on deposits continued to deteriorate and this had a negative impact on the investment return for the financial period.

As at 31 December 2021, the Company had a Market Risk charge under the SCR of €27.1m. The Company's Market Risk charge is based on the Company's investments in term deposits i.e., deposits with terms of 8 days or more and bond holdings. The Market Risk charge captures currency, spread and interest rate risk, along with the Company's concentration risk exposure to certain credit institutions. In accordance with IFRS 16 it also includes a property charge in relation to the lease asset included on the balance sheet.

b) Risk Concentration

The aim of the Company's Asset Liability Management Policy is to select assets that are matched to the total liabilities (as far as that is possible) by currency, duration and by suitable type (predominately deposits). The Company is therefore exposed to concentration risk by product (deposit) and by currency (and therefore geographical area).

However, LeasePlan Treasury provides the Company with monthly financial market updates, including historic and anticipated future environment information. LeasePlan Treasury controls Group Counterparty and Concentration limits and allocation of limits to all entities, and receives reporting against the limits, prepared by the Finance Function of the Company.

Due to the Company's conservative investment policy i.e., restricted primarily to deposits, risk concentrations exist in that the bulk of the Company's asset holdings are with a small number (<10) of highly rated external financial institutions and LeasePlan Corporation. The Company monitors these risk concentrations on an ongoing basis. This is reflected in the Company's Market and Counterparty Risk SCR charges (dependent on the duration of the bank deposit). No other material risk concentrations exist within market risk as the company has exposure to many currencies and rebalances its exposures monthly.

c) Risk Mitigation

The Company's Risk Management System and related policies set out the techniques used by the Company to manage and mitigate the risk to which it is exposed. The Company uses its program of

risk assessments, risk appetite monitoring and risk governance via management risk committees and the Board Risk Committee to monitor the continued effectiveness of these risk mitigation techniques.

Market Risk is the risk of loss resulting directly or indirectly from fluctuations in the level of the market price of assets, liabilities and financial instruments. The risk mitigation techniques used by the Company to mitigate Market Risk are set out in the Company's Investment Risk Policy. These include the following:

- Adopting a conservative approach to investments;
- Holding investments of sufficient amount, duration and liquidity to ensure all liabilities are met as they fall due; and
- Ensuring that there are appropriate policies, strategies and procedures in place to meet these objectives.

The Company's assets have been invested in accordance with the 'prudent person principle', in that the Company has placed the funds that support the claims reserves with external institutions with an S&P rating of investment grade or higher. In addition, the Company applies the prudent person principle in deciding the appropriate level of deposits and bonds to place with LeasePlan Group.

The continued effectiveness of the Company's risk mitigation techniques for Market Risk is monitored by the Company's Investment Management Meeting and, as required, by the Company's Investment Committee in accordance with the Company's Investment Risk Policy, and Investment Management Meeting and Investment Committee Terms of Reference. In addition, the Company's investment risk metrics are used by the Non-Insurance Risk Committee and the Board Risk Committee to monitor the ongoing effectiveness of these risk mitigation techniques.

d) Risk Sensitivity

A number of sensitivity tests are used to assist the Company with understanding its exposure to the volatility of the Company's more material risks. These sensitivity tests on the Company's key risk exposures help identify and quantify risks and help inform the Company's decision-making process.

The following are the sensitivity analyses that are carried out that impact Market Risk:

- As at 31 December 2021, sensitivity analyses show that an increase in interest rates using EIOPA shock up yield curves would result in a decrease in the SCR of €297k, and a decrease in interest rates using EIOPA shock down yield curves would result in an increase in the SCR of €61k.

The above stress test would have the following impact on the Company's Solvency metrics:

Scenario	Own Funds (€000s)	Solvency Capital Requirement (SCR) (€000s)	Solvency Coverage Ratio
Base scenario	258,829	113,857	227%
Interest rates shock up	260,975	113,560	230%
Interest rates shock down	258,343	113,918	227%

3. Credit Risk

a) Risk Exposure

Credit risk is the risk that the Company is exposed to lower returns or loss if another party fails to perform its financial obligations to the Company. The Company is subject to credit risk but the majority of this is in relation to LeasePlan group entities as policyholders, mediators or claim handlers. The Company is exposed to credit risk in the following key areas:

- Amounts due from institutions in respect of deposits placed;
- Reinsurers' share of insurance liabilities;
- Amounts due from reinsurers in respect of claims already paid;
- Amounts due from policyholders;
- Funds held by claim handlers;
- Cash at bank; and
- The Company's bond portfolio.

The Company's main non-LeasePlan credit risk is in relation to reinsurers, the banks in which it places deposits and its portfolio of sovereign and corporate bonds. As all sovereign bonds held are issued by EEA countries, they are not subject to a credit risk charge. The Company's non-LeasePlan deposits and corporate bonds are with counterparties with a Standard & Poor (S&P) investment grade or higher rating. There were no material changes to the Company's credit risk exposure during the reporting period.

As at 31 December 2021, the Company had a Counterparty Default risk charge under the SCR of €15.6m. The Company's Counterparty Default risk charge relates to the risk that counterparties do not meet their obligations as they fall due. This includes exposure to banks, reinsurers, policyholders, claim handlers and intermediaries. It excludes any exposures to counterparties already considered under market risk i.e. bond holdings and longer-term bank exposures.

b) Risk Concentration

There is potential for concentration of risk through the Company's exposure to banks in which it places its deposits and, to a lesser extent, to reinsurers. In relation to its exposure to banks, the Company has counterparty risk limits in place which restrict exposure with any one bank. In order to avoid concentration risk with reinsurers, the Company has limits in place which restrict the maximum share held by reinsurer and by credit rating. On a quarterly basis, a report is prepared and distributed to the Board of Directors and the Risk Committee outlining the current credit rating of reinsurers, along with other monitored factors such as share of reinsurance exposure, outlook and ownership structure.

Due to the Company's conservative investment policy, i.e. restricted primarily to deposits, risk concentrations exist in that the bulk of the Company's asset holdings are with a small number (<10) of highly rated external financial institutions and LeasePlan Corporation. The Company monitors these risk concentrations on an ongoing basis. This is reflected in the Company's Market and Counterparty Risk SCR charges (dependent on the duration of the bank deposit). No other material risk concentrations exist within market risk as the company has exposure to many currencies and rebalances its exposures monthly.

c) Risk Mitigation

The risk mitigation techniques used by the Company to mitigate credit risk are set out mainly in the Company's Reinsurance and Investment Risk policies. The Company manages its credit risk exposure by monitoring and managing the levels of exposure to each counterparty and by monitoring the S&P rating of all assets to ensure the Company's investments are in secure assets of a high quality.

The continued effectiveness of the Company's risk mitigation techniques for credit risk is monitored by the Company's risk committees. In addition, the Company's credit risk appetite is used by the Non-Insurance Risk Committee and the Board Risk Committee to monitor the ongoing effectiveness of the above risk mitigation techniques.

d) Risk Sensitivity

A number of sensitivity tests are used to assist the Company with understanding its exposure to the volatility of the Company's more material risks. These sensitivity tests on the Company's key risk exposures help identify and quantify risks and help inform the Company's decision-making process.

The following are the sensitivity analyses carried out that impact Credit Risk:

- As at 31 December 2021, sensitivity analyses show that a downgrade of 1 credit quality step (as stipulated in Solvency II calibration) of the bank with whom the Company holds the majority of cash balances would result in an increase in the SCR of €2.66m.

The above stress test would have the following impact on the Company's Solvency metrics:

Scenario	Own Funds (€000s)	Solvency Capital Requirement (SCR) (€000s)	Solvency Coverage Ratio
Base scenario	258,829	113,857	227%
Downgrade of 1 credit quality step of largest bank	258,829	116,514	222%

In addition, credit risk related stresses are included in a number of the Company's ORSA scenarios. This process helps the Company stress its credit risk exposure over the business planning period including in combination with other stressed risk exposures.

4. Liquidity Risk

a) Risk Exposure

As the Company's investments are predominately held in short-term bank deposits, it is subject to limited liquidity risk. The Company's Liquidity Risk Policy and Asset Liability Management Policy set out the Company's processes for the management of liquidity risk. Liquidity risk forms part of the Company's Finance function's process-level risk and control self-assessment through which, together with the related risk appetite statement, the risk is assessed, monitored and reported. There were no material changes to the Company's liquidity risk exposure during the reporting period.

The Company has invested a portion of its total investments in bonds purchased with remaining durations of up to 5 years. While these bonds are somewhat less liquid, they represent a small portion of total investments.

b) Risk Concentration

Risk concentrations in relation to liquidity risk can arise in a number of ways:

- **Risk concentration in product type:** Whilst the Company has in recent years increased its investment in its portfolio of corporate and sovereign bonds, the Company's investments remain primarily in term deposits. Therefore, the Company does have a concentration in terms of product type. This concentration does not impact the Company's ability to generate cash in times of stress, as the asset classes employed are quite liquid.
- **Risk concentration in maturity:** The Company short matches assets to cover some longer tail technical reserve payments, so there exists a certain level of concentration in shorter maturity assets. However, this is a prudent policy with respect to liquidity position and is aligned to LeasePlan Corporation group policy. In addition, the Company has minimum acceptable credit ratings (investment grade or higher) and concentration risk limits in place which set the maximum allowable exposure by credit institution.
- **Risk concentration in provider:** This can arise as a result of dependency on a few providers of liquidity stemming from concentrated counterparty default risk. The Company has counterparty risk limits in place which restrict the concentration risk with any one counterparty.

The Director of Finance, in conjunction with the Investment Management Meeting and, as required, the Investment Committee, ensures the following:

- That the concentration limits to asset classes and individual counterparties are subject to review on a monthly basis and any increases are proposed to the Board for approval;
- That active monitoring and management of concentration risk is undertaken, including an analysis of possible contagion; and
- That asset concentration trends are analysed to identify adverse impacts on the Company and that appropriate remedial action is taken.

The monitoring of liquidity concentration risk limits is outlined in further detail in the following section on Risk Mitigation.

c) Risk Mitigation

The Company's Risk Management System and related policies set out the techniques used by the Company to manage and mitigate the risks to which it is exposed. The Company uses its programme of risk assessments, risk appetite monitoring and risk governance via management risk committees and the Board Risk Committee to monitor the continued effectiveness of these risk mitigation techniques.

Liquidity risk is the risk that the Company is unable to realise investments and other assets in order to settle its financial obligations when they fall due. The purpose of liquidity risk management, as part of an overall investment risk strategy, is to ensure there are appropriate practices to provide sufficient liquidity over the short, medium and long term.

The risk mitigation techniques used by the Company to mitigate Liquidity Risk are set out in the Company's Liquidity Risk Policy. These include the following:

- The Finance Function reviews the LPINS cash balance daily and weekly to monitor liquidity positions. This includes determining the level of mismatch between the cash inflows and the cash outflows of both assets and liabilities, and expected cash flows from insurance and reinsurance to determine the total liquidity needed in the short term, including an appropriate buffer for any potential liquidity shortfall.
- In addition, the Finance Function performs daily monitoring of its bank accounts. LPINS prepares for any unusual cash flow movements by holding funds to cover payments for 3 months (excluding receipt of premium) in call accounts (overnight) and short-term deposits than mature in less than 90 days.
- The Company short matches assets to cover some longer tail technical reserve payment requirements.

As at 31 December 2021, LPINS included an asset equal to €36.0m (€32.6m at YE 2020) in Solvency II Own Funds that related to Expected Profits in Future Premiums ("EPIFP"). This has been calculated in accordance with Article 260(2). As this asset relates to profits embedded in 2022 contracts, the emergence of these profits is expected to occur during 2022 (and possibly later years). Given the nature of this asset, it is not a liquid asset that can, for instance, be used to pay claims. This is not an issue for LPINS given the very liquid nature of the LPINS portfolio of "investible" assets where the bulk of these assets are held in highly liquid bank deposits.

The continued effectiveness of the Company's risk mitigation techniques for Liquidity Risk is monitored by the Company's Investment Management Meeting and, as required, the Investment Committee, in accordance with the Company's Investment Risk Policy and Investment Management Meeting and Investment Committee Terms of Reference. In addition, the Company's investment risk appetite is used by the Non-Insurance Risk Committee and the Board Risk Committee to monitor the ongoing effectiveness of these risk mitigation techniques.

d) Risk Sensitivity

As discussed above, the Company is exposed to minimal Liquidity Risk due to the nature of its investments. The Company also short matches assets to cover some longer tail technical reserve payments, which is a prudent policy with respect to liquidity position. Liquidity Risk forms part of the Company's Finance function's process-level risk and control self-assessment through which, together with the related risk metrics, the risk is assessed, monitored and reported. Liquidity Risk is not an influential driver of the Company's Solvency Coverage Ratio and as such, the Company does not carry out sensitivity analyses on this risk.

5. Operational Risk

a) Risk Exposure

The Company is exposed to operational risk arising from operations conducted in-house and from operations which it has outsourced. The Company's Operational Risk Policy sets out the Company's processes for the management of operational risk. The Company uses its risk appetite statements for operational risk and its programme of operational risk monitoring and business continuity management to assess and monitor the risk. The Company, through its entity level risk assessment and, in particular, through its various process-level risk and control self-assessments, assesses, monitors and reports upon operational risk. The Company monitors performance against key risk indicators for operational risk in its Non-Insurance Risk Committee. There were no material changes to the Company's operational risk exposure during the reporting period.

As at 31 December 2021, the Company has an operational risk charge under the SCR of €7.6m. This relates to the risk associated with the people, processes and systems involved in the running of the Company.

b) Risk Concentration

The Company does not have a risk concentration relating to operational risk. The potential for concentration risk is continuously managed and monitored using the risk management techniques outlined in the section below.

c) Risk Mitigation

The Company's Risk Management System and related policies set out the techniques used by the Company to manage and mitigate the risks to which it is exposed. The Company uses its programme of risk assessments, risk appetite monitoring, key risk indicators and risk governance via risk committees and the Board Risk Committee to monitor the continued effectiveness of these risk mitigation techniques.

Operational Risk is the risk of a positive, negative or potential loss resulting from inadequate or failed internal processes, human behaviour and systems or from external incidents. The risk mitigation techniques used by the Company to mitigate Operational Risk are set out in the Company's Operational Risk Policy. These include risk identification, the conduct of entity level and process level risk assessments, the implementation of appropriate risk responses following assessment, risk monitoring, operational risk appetite statement setting and reporting. The Company operates an operational risk incident monitoring process and categorises incidents into the following categories:

- Internal Fraud;
- External Fraud;
- Employment Practices and Workplace Safety;
- Clients, Products & Business Practices;
- Damage to Physical Assets; and
- Execution, Delivery & Process Management.

In addition, the Company's Business Continuity Management and Information Security functions seek to mitigate operational risk in their respective areas.

The continued effectiveness of the Company's risk mitigation techniques for operational risk is monitored by the Company's Risk committees. In addition, the Company's operational risk appetite is used by the Non-Insurance Risk Committee and the Board Risk Committee to monitor the ongoing effectiveness of the above risk mitigation techniques.

d) Risk Sensitivity

Operational risk, while it requires ongoing vigilance, is not, by itself, a substantial risk for the Company. Accordingly, while no specific risk sensitivity is provided here for same, during the ORSA process, a qualitative assessment of material operational risks is carried out, as well as a quantitative assessment of the impact of a large operational loss on the Company. The impact of this operational loss scenario within the Company's ORSA process was to reduce the Own Funds as a result of a decrease in profit. This did not have a material impact on the Company's Solvency Coverage Ratio. This process helps the Company stress its operational risk exposure over the business planning period including in combination with other stressed risk exposures.

6. Any other material risks

As part of the regular ORSA process, the overall risk profile and the associated capital needs are assessed against the Company's actual solvency capital position. The most important risks to which the Company is exposed, including risks that are not incorporated into the standard formula, are identified through a combined top-down (strategic risk assessment) and bottom-up (control risk self-assessments) approach. The following risks, outside the scope of the standard formula, are recognised by the Company as requiring ongoing vigilance:

- Cyber Risk;
- Climate change;
- Group Risk;
- Strategic Risk; and
- Reputational Risk.

a) Cyber Risk

With the increased dependency on electronic data storage within the Company and the industry, there is increasing cyber security risk of data theft, and malicious data and service disruption. For this reason, the Company operates an Information Security Function within the second line of defence. The function monitors 14 information security domains. These domains cover the core elements of cybersecurity, including:

- a) Application security;
- b) Information and data security;
- c) Network security;
- d) Business continuity planning; and
- e) Ongoing end user education.

Performance in relation to each information security domain, including the required periodic activities per domain, is monitored by management and the Board Risk Committee.

b) Climate change

Due to the nature of the risks insured by the Company, namely risks associated with moveable assets in the form of vehicles, the Company's direct exposure to risks associated with climate change is limited. However, the Company does underwrite Motor Catastrophe (e.g., flood and hail) insurance. Increased frequency and/or severity of claims under this cover is considered to be the Company's main climate change-related underwriting exposure. The Company maintains reinsurance in respect of this cover. In addition, as climate change considerations contribute to the increasing proportion of Electric Vehicles (EVs) within the Company's insured fleet, the Company has, where appropriate, adjusted its underwriting processes to address risks associated with such vehicles. Due to the nature of the Company's investments (predominately deposits), the Company has limited investment-related transition risk. Climate change risk is assessed in the Company's ORSA process.

c) Group Risk

The Company is heavily dependent on the wider LeasePlan group for many of its policyholders, mediators, claim handlers, investments and for its sales channel. Group risk is included in the Company's corporate risk register and managed through a number of controls. The Company's ORSA includes stress scenarios in relation to group risk.

d) Strategic Risk

Strategic risk is the risk to the Company's earnings/capital due to adverse business decisions, improper implementation of decisions or lack of responsiveness to changes in the business environment.

Strategic risk is included in the Company's corporate risk register and is managed through a number of controls. The Company's ORSA stress testing process includes a strategic risk component through the inclusion of a reverse stress test looking at the impact of premium growth. A number of additional strategic risks that have low residual risk (i.e. taking controls into account) are assessed in the Company's Enterprise Risk Assessment.

During the continuation of the COVID-19 pandemic in 2021, as governments continued to impose various levels of restrictions on movement and closed sections of their economies, the Company continued to assess its risk exposure and respond accordingly.

e) Reputational Risk

Reputational risk is the risk to the Company's earnings/capital due to an adverse perception of the image of the Company on the part of clients, counterparties, shareholders, investors and regulators.

Reputational risk is included in the Company's corporate risk register and the Company operates a risk metric for reputational risk which is monitored through the Risk Appetite monitoring process.

The Company also has specific controls in place to limit reputational risk exposure such as the Company's Code of Conduct and contractual agreements with outsourced service providers, both of which focus on ethical behaviour, honesty, trust and integrity.

D Valuation for Solvency Purposes

1. Assets

This section contains information regarding the valuation of the balance sheet items. For each material asset class, the bases, methods and main assumptions used for Solvency II purposes are outlined.

The following table analyses the Company's financial assets at 31 December 2021:

	Assets as at 31 December 2021	
	Solvency II Value €'000	Statutory Accounts Value €'000
Deferred acquisition costs		2,879
Property, plant & equipment held for own use	2,468	2,603
Bonds	53,916	53,747
Deposits other than cash equivalents	323,904	24,979
Reinsurance recoverables from:	29,016	34,142
<i>Non-life excluding health</i>	23,246	28,652
<i>Health similar to non-life</i>	29	0
<i>Life excluding health and index-linked and unit-linked</i>	5,741	5,490
Insurance and intermediaries receivables	36,823	97,184
Reinsurance receivables	0	0
Receivables (trade, not insurance)	436	436
Cash and cash equivalents	166,249	464,991
Total assets	612,812	680,961

Valuation of most financial assets is based on amortised cost for statutory purposes. In the paragraphs below, the valuation methodologies are described:

Deferred acquisition costs

Deferred acquisition costs are the amount of an insurer's acquisition costs incurred as premium is written but earned and expensed over the term of the policy. The unearned portion is capitalized and recognized as an asset on the insurer's balance sheet. However, for Solvency II purposes deferred acquisition costs of €2.9m are excluded from the valuation of assets.

Property, plant & equipment held for own use

Property, plant & equipment are valued at net book value for statutory purposes, however, for Solvency II valuation purposes, computer software tailored to the needs of the undertaking, that cannot be sold to another user, shall be valued at nil (€135k of the property, plant & equipment relates to the capitalised value of the general ledger system and data management system). Property, plant and equipment includes €2.4m of right-of-use assets relating to leased assets.

Bonds

The Company holds a mixture of corporate and sovereign bonds. The Bonds are valued based on market value under Solvency II and on an amortised cost basis under IFRS, with an IFRS 9 adjustment for Expected Credit Loss. These differing treatments account for the difference in valuation between Solvency II and Statutory accounts value.

Deposits other than cash equivalents

Deposits other than cash equivalents are valued at fair value by the relevant financial institution, and the Company receives monthly statements at the period end to confirm the balances held. The categorisation of deposits and cash and cash equivalents is different between IFRS and Solvency II.

The difference between the Solvency II valuation and IFRS valuation of deposits other than cash equivalents, is the IFRS 9 adjustment for Expected Credit Loss. While accrued interest is excluded under IFRS, it is included under Solvency II.

Reinsurance asset

The Reinsurance asset relates to the amounts that can be collected from reinsurers. The value of the asset is estimated using a method that is in line with the reinsurance contract for IFRS purposes. This balance is adjusted for the IFRS 9 Expected Credit Loss and then adjusted for Solvency II purposes for the expected default of the reinsurer and discounting.

The Company has claims that have been settled via court awarded Periodic Payment Orders (“PPOs”) that provide regular payments to the claimant until death. As such these obligations have been valued using life actuarial techniques and the related reinsurance recoveries have been re-classified as a Life Reinsurance Asset.

Insurance and intermediaries’ receivables

Insurance and intermediaries’ receivable balances represent premiums due from policyholders. The Company has existing contracts at the valuation date (31 December) with associated premiums which are not due to be paid until after the valuation date. The future premiums are treated as debtors for IFRS reporting. A creditor is set up for the associated future commission payments. However, for Solvency II purposes, the premiums and commission are a future cashflow associated with an existing contract and as such, they form part of the technical provisions. At 31 December 2021 the amount of future premium is approx. €40.4m. This is included as a reduction in technical provisions.

Cash and cash equivalents

Cash and cash equivalents are valued at fair value by the relevant financial institution, and the Company receives monthly statements at the period end to confirm the balances held. The categorisation of deposits and cash and cash equivalents is different between IFRS and Solvency II.

The difference between the Solvency II valuation and IFRS valuation of cash and other than cash equivalents is the IFRS 9 adjustment for Expected Credit Loss.

2. Technical Provisions

a) Technical Provisions Basis, Methods and Assumptions

The following section outlines the approach, general methodology and components of the Company's Technical Provisions. The two main components of the Technical Provisions are the best estimate provision and the risk margin. There are several distinct provisions that feed into the overall best estimate provision.

Provision for Claims Outstanding: The provision for claims outstanding covers cashflows related to all claim events which occur before or at the valuation date. The cashflows projected comprise of:

- Outstanding claims / Case reserves;
- Incurred but not reported claims;
- Incurred but not enough reported claims; and
- Premiums earned but yet to be received and commission earned but yet to be paid.

The Company makes use of the below standard techniques in order to arrive at an estimation of the ultimate level of claims:

Development Factor Method ("DFM")

- For this method, the Company assumes that for a particular accident period, the proportion of the ultimate claims, which has developed by each period, follows past trends.
- A set of assumed development factors is derived. The development factors are typically calculated as a weighted average of past accident periods. More recent accident periods generally receive a higher weighting.
- Projections are carried out on past claims data using the development factors that have been determined.
- The DFM is applied to both paid and incurred claims to produce both paid and incurred ultimate claims estimates.

Loss Ratio Method

- For this method, a projected loss ratio for a particular accident period is estimated by reference to an older, more developed period.
- By applying the projected loss ratio to a known earned premium, ultimate claims are estimated for the relevant accident period.

Burning Cost Method

- For this method, ultimate claims are arrived at by considering the ultimate cost of claims per unit of exposure.
- The ultimate burning cost for past periods is assessed in order to arrive at an estimate of ultimate claims for more recent accident periods.
- The past estimates used may or may not be adjusted for seasonal and / or inflationary effects.
- This method can be useful for more recent accident periods, avoiding an over reliance on underdeveloped notified claims data.

The company considers the appropriateness of the above methodologies separately by Solvency II line of business and by accident year. The selection of the most appropriate method is based on expert judgement which considers among other factors, the quantity, quality and reliability of the available data, and analyses all important characteristics of the business. Appropriate consideration was given to potential distortions in claims patterns during 2020 and 2021 arising from the COVID-19 pandemic.

Claims Handling: The Company holds a provision for future claims handling expenses associated with the future processing of claims for accident periods up to the valuation date. The actuarial department assesses an appropriate provision to cover the cost of settling current and future claims arising from insurance business written to the end of the relevant accounting period. It should be noted that for a proportion of the Company's risks, claims are managed by other parties and charged on a "per event" or equivalent basis.

Premium Provision: To calculate the premium provision a forward-looking combined ratio estimate is applied to the Company's unexpired premium. The ratio applied includes estimates of claims handling costs and administration expenses. The claims ratio is based on realistic expectations of future claims and considers future expected premium rates. The premium provision is net of premiums which are yet to be received for unexpired risk. Premium provision calculations are completed by the actuarial department in conjunction with the finance department. The estimation covers all programmes and all claim types.

Events Not In Data ("ENIDs"): The approaches used by the Company to arrive at a best estimate of ultimate claims allow for the historic level of uncertainty in the past claims data. In order to allow for the uncertainty regarding events that the Company believes are not yet present in past data, the Company makes an explicit allowance for ENIDs. These are events which could occur but are not yet apparent in the Company's historic claims data. Examples include provisions to allow for an unexpected future inflation spike, risks associated with increased coverage of Electric Vehicles, and provisions to guard against catastrophic events resulting from climate changes.

Reinsurance: The Company has (non-proportional) reinsurance in place to protect against large individual motor third party liability (TPL) claims. The Company also has reinsurance in place to protect against accumulations of risk related to motor property damage claims, e.g. from catastrophes including weather events.

To calculate the net technical provisions, the Company's reinsurers' share of claims is subtracted from claims provisions.

The Company's reinsurance cover is placed with a variety of third party reinsurers with strong credit ratings. The Company currently has no balances in dispute with respect to third party reinsurance recoveries.

Discounting: As per Solvency II requirements, the Company discounts the run-off of the premium provision and the provision for claims outstanding in order to arrive at the Solvency II technical provisions. The pattern for the run-off of the premium provision and the provision for claims outstanding is arrived at using historic payment development trends. The discounting of the cashflows associated with the premium provision and provision for claims outstanding is performed using discount rates that are no higher than the relevant risk-free interest rates that are published by the European Insurance and Occupational Pensions Authority ("EIOPA").

Risk Margin: The approach taken by LPINS for the Risk Margin calculation is Simplification 2 - essentially the most detailed approach that can be used by a "Standard Formula" insurer. In this, the Non-Life and Health Underwriting risk charges are explicitly recalculated based on the projected run-off of the Technical Provisions ("TPs"). The Life Underwriting risk is run-off in relation to the expected run-off of the underlying claims. All the risk charges for all risk at future points in time are estimated based on the run-off of the total technical provisions. The Company uses EIOPA's prescribed cost of capital of 6% and applies this to the future SCR estimates. Discounting is performed for each future time period using EIOPA's prescribed yields. These calculations then arrive at the Company's risk margin.

This approach was chosen in light of the need for separate cashflow modelling, given the co-existence of both short-term and long-term liabilities.

Summary of Technical Provisions Results: The Company's overall gross and net technical provisions are illustrated in the exhibit below:

GROSS		LPINS Technical Provisions at 31 Dec 2021 (€'000)		
Line of Business	Provision for Claims Outstanding	Premium Provision	Risk Margin	Total
Income protection insurance	9,611	(4,103)	700	6,208
Motor vehicle liability	225,304	(14,559)	16,404	227,149
Other motor	30,692	4,641	2,235	37,568
Fire & other damage to property insurance	141	(167)	10	(16)
Legal expenses	1,128	(532)	82	678
Assistance	554	(883)	40	(289)
Miscellaneous financial loss	4,686	(7,020)	341	(1,993)
Annuities from non-life contracts	10,065	0	2,346	12,411
Proportional non-life reinsurance - other motor insurance	1,784	0	130	1,914
Total	283,965	(22,623)	22,288	283,630

NET		LPINS Technical Provisions at 31 Dec 2021 (€'000)		
Line of Business	Provision for Claims Outstanding	Premium Provision	Risk Margin	Total
Income Protection Insurance	9,610	(4,131)	700	6,179
Motor vehicle liability	199,748	(11,205)	16,404	204,947
Other motor	27,367	6,608	2,235	36,210
Fire & other damage to property insurance	141	(167)	10	(16)
Legal expenses	1,128	(532)	82	678
Assistance	555	(569)	40	26
Miscellaneous financial loss	4,686	(7,020)	341	(1,993)
Annuities from non-life contracts	4,323	0	2,346	6,669
Proportional non-life reinsurance - other motor insurance	1,784	0	130	1,914
Total	249,342	(17,016)	22,288	254,614

The below table compares the gross and net technical provisions as at 31 December 2021 to the position as at 31 December 2020:

	LPINS Technical Provisions (€'000)		
	As at 31 Dec 2021	As at 31 Dec 2020	Difference
Gross Technical Provisions	283,630	279,657	3,973
Net Technical Provisions	254,614	256,824	(2,210)

There is an increase of €4m in the gross and a decrease of €2.2m in the net technical provisions between 31 December 2020 and 31 December 2021. This divergence between gross and net movement in overall technical provisions is largely explained by specific large claims experience during the year. It is expected that, in normal circumstances, the increase in technical provisions would have been higher, however the company experienced reduced claims frequencies in 2020 and 2021 owing to the COVID-19 related environment.

b) Level of Uncertainty associated with the amount of Technical Provisions

The Company's best estimate calculations seek to represent close to the 50th percentile of estimates for the Company's claims liabilities. The best estimate arrived at is the probability weighted estimate of future claims and expenses. As the best estimate is itself an estimate, there is a level of uncertainty associated with this amount.

In terms of quantifiable elements of uncertainty, the main elements include discount rates, loss ratio assumptions for exposure beyond the valuation date and lapse rates.

The table below shows the results of the stress tests carried out on the technical provisions:

Scenario	Net Non-Life TPs excluding Risk Margin (€'000)	Relative Change from Base Scenario
Base scenario	232,326	
EIOPA Shock Up Interest Rates	222,234	-4.3%
EIOPA Shock Down Interest Rates	234,238	0.8%
Increase in FX rates of 10%	234,481	0.9%
Increase in loss ratios of 2.5%	236,324	1.7%
Increase in loss ratios of 10%	251,460	8.2%
Increase of Lapse Rates absolute by 1%	232,756	0.2%
Increase of Lapse Rates absolute by 5%	234,618	1.0%

- **Interest Rate Risk**

Applying the EIOPA shock up yield curve reduces the technical provisions by 4.3% and applying the EIOPA shock down yield curves increases the technical provisions by 0.8%. Being a non-life insurer with relatively short-term liabilities and a short asset-side duration, the Company has a low exposure to reductions in interest rates.

- **Currency FX Rate Sensitivity**

A strengthening of foreign currency rates against the euro resulted in an increase in the technical provisions of 0.9%. As it is the Company's Investment Policy to broadly match assets with liabilities in terms of currency, the Company does not have material exposures to changes in currency rates.

- **Loss Ratio Sensitivity**

An increase in the loss ratio assumptions of 2.5% results in a 1.7% increase in the technical provisions. If the loss ratios of individual programmes are increased by 10%, this results in an 8.2% increase in technical provisions.

- **Lapse Rate Sensitivity**

Two lapse rate scenarios were considered. An increase in the lapse rate assumption of 1% results in a 0.2% increase in the technical provisions, while an increase of 5% would increase technical provisions by 1.0%.

Additional sources from which uncertainty could potentially arise are as follows:

Events Not In Data ("ENIDs"): The approaches used by the Company to arrive at a best estimate of ultimate claims allow for the historic level of uncertainty in the past claims data. In order to allow for the uncertainty regarding events that the Company knows are not yet present in past data, the Company has a specific provision for ENIDs.

Premium Provision: The premium provision is subject to additional uncertainty over and above that contained within the claims provision in that it contains cost estimates for events that have not yet occurred. Particularly at year end, it must also contain an allowance for business bound in the main renewal season for the following year that is not yet recorded on the system, as well as premium contracted and on the system but not yet received. These involve additional assumptions which increase the level of uncertainty, though this is mitigated to a certain extent by reasonableness checks.

c) Solvency II Best Estimate VS Financial Statement Reserves

The Company's Solvency II best estimate uses as a starting point the undiscounted, best estimate provisions that are included in the financial statements. Thereafter, a number of adjustments are applied to comply with Solvency II requirements (e.g. discounting is applied together with an ENID provision being held).

For financial statements, the Company holds an explicit risk margin for prudence / uncertainty consistent with industry practice and to satisfy the IFRS requirement of prudent reporting.

The Company's movement from IFRS reserves to Solvency II technical provisions is set out in the table below:

Total Technical Provisions - IFRS to Solvency II Movements (€'000)			
	Gross	Ceded	Net
IFRS Reserves	318,762	34,142	284,620
Total Solvency II Technical Provisions	283,630	29,016	254,614

d) Application of the Matching Adjustment

This guideline is not applicable to the Company as the Company does not use the matching adjustment.

e) Application of the Volatility Adjustment

This guideline is not applicable to the Company as the Company does not use the volatility adjustment.

f) Application of the Transitional Risk-Free Interest Rate-Term Structure

This guideline is not applicable to the Company as the Company does not use the transitional risk-free interest rate-term structure.

g) Application of the Transitional Deduction

This guideline is not applicable to the Company as the Company does not use the transitional deduction.

h) Recoverables from Reinsurance Contracts

The Company has reinsurance in place to protect against both large individual third party liability claims and also accumulations of risk with regard to property damage.

The Company's reinsurance arrangements are taken into account in order to calculate net technical provisions for Solvency II. The Company complies with Solvency II regulation by adjusting claims recoveries due from reinsurers for expected reinsurer default together with discounting expected future reinsurance recoveries using an expected payment pattern relevant to such cashflows.

The exhibit below displays the Company's gross and net technical provisions, along with the Company's reinsurers' share of technical provisions:

	LPINS Technical Provisions (€'000)		
	Gross	RI	Net
Total	283,630	29,016	254,614

3. Other Liabilities

This section contains information regarding the valuation of the balance sheet items. For each material liability class, the bases, methods and main assumptions used for Solvency II purposes are outlined.

The following table analyses the Company's financial liabilities at 31 December 2021:

	Other liabilities as at 31 December 2021	
	Solvency II Value €'000	Statutory Accounts Value €'000
Technical Provisions - non-life	265,011	336,242
Technical provisions - health (similar to non-life)	6,208	10,245
Technical Provisions - life (excluding unit linked and index linked)	12,411	12,452
Total Technical Provisions	283,630	358,939
Insurance and intermediaries payables	60,876	67,620
Reinsurance payables	2,394	2,394
Payables (trade, not insurance)	7,083	5,769
Total liabilities	353,983	434,722
Excess of assets over liabilities	258,829	246,239

Valuation of most financial liabilities are based on fair value for statutory purposes. In the paragraphs below, the valuation methodologies are described.

Insurance & intermediate payables

The main differences between Solvency II and IFRS for insurance & intermediate payables are the reclassification of the non-technical (aggregate deductible) liabilities to the technical provisions where the aggregate deductible settlement period had been reached, and an amount of future commission of approx. €3.1m that is included as an increase in technical provisions.

Reinsurance payables

This balance reflects amounts owed to reinsurers, in respect of reinsurance agreements in place. There are no differences between Solvency II valuation and IFRS valuation of reinsurance payables.

Payables (trade, not insurance)

The difference between Solvency II and IFRS for payables is due to the increase in the tax liability which results from the increase in the financial result included in the company's own funds (excess of assets over liabilities) under Solvency II.

Please note the following

- the Company does not currently have a Deferred Tax Asset, so any movements on the revenue of the Company will have an impact on the tax creditor.
- The Company operates a defined contribution pension scheme. The pension charge represents contributions payable by the Company to the scheme. As at 31 December 2021, there are no outstanding contributions.
- The Company recognises operating leases with regards to office space and motor vehicles. There was one new operating lease entered into during 2021.

The main drivers of the increase in Solvency II Own Funds are the strong financial result for 2021, the Written but not yet incepted (WBNYI) business for 2022 offset by the dividend payment in October 2021.

4. Alternative Methods for Valuation

This section is not applicable to the Company as the Company does not use any alternative methods for valuation.

5. Any other information

The Company has no other disclosures to make in respect of the Company's Valuation for Solvency Purposes.

E Capital Management

1. Own Funds

a) Objectives / Policies / Processes for Managing Own Funds

The strategic objectives of capital management within the Company are:

- **Regulatory compliance:** To ensure compliance with the Company's regulatory capital requirements and in the case of adverse SCR levels, to set out the approach to recoverability including the consideration of capital relief measures and / or additional capital;
- **Liquidity:** To maintain sufficient liquidity to ensure the Company is able to meet its obligations in a timely manner and at a reasonable cost in accordance with the Company's Liquidity Risk Policy;
- **Efficient capital allocation:** To manage and allocate capital efficiently to achieve sustainable returns and facilitate growth objectives;
- **Financial strength:** To ensure access to capital markets on competitive terms, so that the company's overall cost of capital is minimised; and
- **Continuity of business:** All of the above objectives are consistent with the continuation of profitable business in line with Company Strategy.

Taken together, these strategic goals seek to strengthen the Company's ability to withstand losses from adverse business and market conditions, enhance its financial flexibility and serve the interests of the Company's stakeholders.

The Company strives to ensure that it maintains capital levels which are consistent with the Company's Risk Appetite Framework and the Company's Strategy, at both a point in time and on a forward-looking basis.

The Company's capital planning process aims to be dynamic and forward-looking in relation to the Company's risk profile and takes into account the output from the Risk Management System and the Own Risk and Solvency Assessment ("ORSA") as part of capital planning activities.

Capital planning activities shall involve taking into account current and anticipated changes in the Company's risk profile, such as those reflected in its business plan, and forecasting the related impact on capital. In addition, as part of its capital planning, the Company shall integrate projected capital needs with its business planning and financial forecasting processes.

As part of the ORSA process, Solvency II balance sheet projections are prepared with solvency requirements based on the strategy and business plan of the Company projected over a 5-year time horizon.

Responsibility for the on-going monitoring of the Company's Capital Management Policy has been assigned to the Company's Director of Finance, who, with the support of the Risk Function, Actuarial Department and Compliance Function performs an annual review to ensure that the Capital

Management Policy and the Capital Management Plan continue to be relevant to current and planned operations of the Company.

The Company's Capital Management Policy and the Capital Management Plan and Dividend Policy are monitored by the Audit Committee annually and presented to the Board for re-approval. The Company's SCR assurance process, which is designed to ensure that the Company complies with its capital requirements on an ongoing basis, forms part of the company's Capital Management Policy.

b) Own Funds by Tier

Under Solvency II Own Funds are classified into tiers and there are eligibility requirements / limits applicable to the tiers to cover the SCR and MCR.

At present, the Company has only Tier 1 capital, i.e. the highest quality of capital available.

The Company's Director of Finance is responsible for ensuring that the Own Funds items meet the Solvency II eligibility requirements and are classified correctly. The Director of Finance is also responsible for ensuring that the terms and conditions of any Own Fund item are clear and unambiguous in relation to the criteria of Solvency II.

Issuance of Own Fund items shall be in accordance with the Company's Capital Management Plan. As part of the business planning and ORSA processes, dividend payments and capital requirements shall be considered in conjunction with the Capital Management Plan.

The exhibit below outlines the Company's available Own Funds (by tier).

LPINS Own Funds (€'000)			
Available Own Funds		2021	2020
Share Premium, Issued Share Capital, Retained Earnings	Tier 1	248,024	233,486
	Tier 2	0	0
	Tier 3	0	0
Other own fund items approved by the supervisory authority as basic own funds not specified above	Tier 1	10,805	10,805
	Tier 2	0	0
	Tier 3	0	0
Total		258,829	244,291

c) Own Funds Eligible to Cover SCR

The exhibit below outlines the Company's Own Funds (by tier) which are available to cover the SCR:

LPINS Own Funds (€'000)			
Own Funds Eligible for SCR		2021	2020
Share Premium, Issued Share Capital, Retained Earnings	Tier 1	248,024	233,486
	Tier 2	0	0
	Tier 3	0	0
Other own fund items approved by the supervisory authority as basic own funds not specified above	Tier 1	10,805	10,805
	Tier 2	0	0
	Tier 3	0	0
Total		258,829	244,291

There has been no change in the quality of Own Funds available to cover the SCR, i.e. the company only has Tier 1 capital. There has been an increase of €14.5m in the amount of the Own Funds. It is important to note that the improvement of LPINS' capital position is due to strong financial results for 2021, together with the contribution from written but not yet incepted business for 2022 offset by the dividend payment in October 2021.

d) Own Funds Eligible to Cover MCR

The exhibit below outlines the Company's Own Funds (by tier) which are available to cover the MCR:

LPINS Own Funds (€'000)			
Own Funds Eligible for MCR		2021	2020
Share Premium, Issued Share Capital, Retained Earnings	Tier 1	248,024	233,486
	Tier 2	0	0
	Tier 3	0	0
Other own fund items approved by the supervisory authority as basic own funds not specified above	Tier 1	10,805	10,805
	Tier 2	0	0
	Tier 3	0	0
Total		258,829	244,291

The own funds available to cover the MCR are the same as those available to cover the SCR. Therefore, the reasons for the differences in amount, quality and structure of own funds between 31 December 2020 and 31 December 2021, are as per section c) above.

e) Differences between Equity in Financial Statements and Basic Own Funds

The Company's financial statements include a margin for prudence when calculating claims reserves. This margin is not included by the Company when calculating claims reserves for the purpose of the Solvency II Balance Sheet.

The table below outlines the Company's reconciliation reserve information:

LPINS Reconciliation Reserve (€'000)		
	2021	2020
Excess of assets over liabilities (A)	258,829	244,291
Other basic own fund items (B)	11,484	11,484
Total (A – B)	247,345	232,807

The reconciliation reserve has increased by €14.5m during 2021. The main drivers for the increase are the financial results for 2021, together with the contribution from written but not yet incepted business for 2022 offset by the dividend payment in October 2021.

The reconciliation reserve is essentially a formula driven number derived from the Solvency II balance sheet and any potential volatility in this reserve will be driven primarily by changes in the valuation of assets and the valuation of technical provisions and other liabilities (as discussed in Section D).

f) Own Funds Items subject to Transitional Arrangements

This guideline is not applicable to the Company as the Company does not have any Own Fund items that are subject to transitional arrangements.

g) Ancillary Own Funds

This guideline is not applicable to the Company as the Company does not have any ancillary Own Funds.

h) Restrictions on Own Funds

As required by the rules of the Portuguese Green Card Bureau, the Company has a charge in place over a designated bank account for the purposes of providing a guarantee required by that body. The Company maintains circa €600k in this designated bank account. In the event of strained capital circumstances, the Company cannot immediately draw upon this €600k and as such it represents a restriction to the Company's Own Funds.

2. Solvency Capital Requirement and Minimum Capital Requirement

a) Amount of SCR and MCR

The amounts of the Company's SCR and MCR are outlined below:

€'000	LPINS Capital Requirements
SCR	113,857
MCR	39,949

b) Amount of SCR by Risk Modules

The breakdown of the Company's SCR calculation by risk module is included in the table below. Please note that diversification benefit explains the summation of the individual components exceeding the overall requirement.

€'000	LPINS Capital Requirements
Market risk	27,095
Counterparty default risk	15,616
Non-life underwriting risk	92,556
Health underwriting risk	39,105
Operational risk	7,578
Life underwriting risk	879
LACDT	(15,608)
SCR	113,857

c) Simplified Calculations and / or Company Specific Parameters

This guideline is not applicable to the Company as the Company does not use any simplified calculations or company specific parameters.

d) Undertaking Specific Parameters (USPs) and / or Capital Add-Ons

This guideline is not applicable to the Company as the Company does not use USPs or have any capital add-ons.

e) Amount of Capital Add-Ons

This guideline is not applicable to the Company as the Company does not have any capital add-ons.

f) Inputs for MCR

The Company's MCR is calculated by using a straight line formula which incorporates net TPs and net premiums written for the last 12 months.

The prescribed MCR calculation applies both an upper and lower bound. The upper bound is equal to 45% of the corresponding SCR, while the lower bound is set at 25% of the SCR.

g) Loss-Absorbing Capacity of Deferred Taxes (LACDT)

The SCR is reduced to allow for the benefit arising from the loss absorbing capacity of deferred taxes [LACDT] in the event of the company incurring a loss equal in value to the bSCR (Basic SCR excluding any tax relief). Were this to occur, this would crystallise a tax loss which could be carried forward to offset future taxable profits. The monetisation of these future tax offsets is what underlies the reduction in SCR permitted by LACDT.

At year-end 2021, the LACDT benefit is used to reduce the overall SCR by €15.6m (from €129.5m to €113.9m).

The future taxable profits are based on business projections (including future profits) within the time horizon of the company's business plan (and no longer than 5 years into the future). Given that the period for recouping tax losses is relatively short, past losses carried forward are assumed to be utilised in full to offset future taxable profits. Assumptions used are believed to be realistic and achievable in nature and, in many cases, will be calibrated off past observations.

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

This section is not applicable to the Company as the Company does not use the duration-based equity risk sub-module when calculating its SCR.

4. Differences between the standard formula and any internal model Information

This section is not applicable to the Company as the Company does not use an internal model when calculating its SCR.

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

The Company complied with the Minimum Capital Requirement and the Solvency Capital Requirement during 2021.

The Company has a Capital Management Policy and a Capital Management Plan in place which set out the Company's approach to the setting and monitoring of capital resources, not just at a particular point in time, but over the business planning period. One of the strategic objectives of capital management within the Company is to ensure compliance with the regulatory capital requirements and in the case of adverse SCR levels, the approach to recoverability including the consideration of capital relief measures and/additional capital.

The Company's capital position is monitored on an ongoing basis in accordance with the Risk Appetite Framework. Specifically outside of the annual requirement to calculate a SCR, LPINS calculates approximate SCRs on a quarterly basis and these are reported to the CBI as part of the quarterly QRTs. In order to ensure appropriate levels of capital at all times, the Company has defined ranges around its capital risk appetites with thresholds and limits that shall trigger actions.

The Board is responsible for approving and adopting this Capital Management Policy and ensuring sufficient oversight of Capital Management on an on-going basis.

6. Any other information

The Company has no other disclosures to make in respect of the Company's Capital Management.

Appendix I: Glossary

Term	Definition
AOTP	Actuarial Opinion on Technical Provisions
ARTP	Actuarial Report on Technical Provisions
CBI	Central Bank of Ireland
DFM	Development Factor Method
EEA	European Economic Area
EIOPA	European Insurance and Occupational Pensions Authority
ENID	Events Not In Data
EPIFP	Expected Profits in Future Premium
FOS	Freedom of Service
ICT	Information and Communications Technology
IFRS	International Financial Reporting Standards
MCR	Minimum Capital Requirement
MTPL	Motor Third Party Liability
OECD	Organisation for Economic Cooperation and Development
ONR	Online Reporting System
ORSA	Own Risk and Solvency Assessment
PCF	Pre-Approved Control Functions
PPOs	Periodical Payment Orders
QRT	Quantitative Reporting Template
SCR	Solvency Capital Requirement
SFCR	Solvency and Financial Condition Report
S&P	Standard & Poor's
TPL	Third Party Liability
UPR	Unearned Premium Reserve
USPs	Undertaking Specific Parameters
VYE	Vehicle Year Exposure
WBNYI	Written but not yet incepted

Appendix II: LPINS Related parties

The Company's related parties during 2021 included the following entities:

LeasePlan Australia Limited, Melbourne (ceased to be a LeasePlan group company during 2021)
LeasePlan Ceska Republika s.r.o., Prague
LeasePlan Danmark A/S, Copenhagen
LeasePlan Deutschland GmbH, Düsseldorf
LeasePlan Finance N.V., Amsterdam
LeasePlan Finland Oy, Helsinki
LeasePlan Fleet Management (Polska) Sp. z o.o., Warsaw
LeasePlan Fleet Management Services Ireland Ltd, Dublin
LeasePlan Fleet Management N.V., Zaventem
LeasePlan France S.A.S., Paris
LeasePlan Hellos S.A., Athens
LeasePlan Hungaria Zrt, Budapest
LeasePlan Italia S.p.A., Milan
LeasePlan Luxembourg, Luxembourg
LeasePlan Nederland N.V., Amsterdam
LeasePlan New Zealand Limited, Auckland (ceased to be a LeasePlan group company during 2021)
LeasePlan Norge AS, Oslo
LeasePlan Österreich Fuhrparkmanagement GmbH, Vienna
LeasePlan Partnerships & Alliances N.V., Zaventem
LeasePlan Portugal Comercio e Aluguer de Autom6veis e Equipamentos Unipessoal Lda., Lisbon
LeasePlan Romania SRL, Bucharest
LeasePlan Servicios S.A., Madrid
LeasePlan Slovakia s.r.o., Bratislava
LeasePlan Service Sverige AB, Stockholm
LeasePlan Sverige AB, Stockholm
LeasePlan Truck N.V., Zaventem
LeasePlan UK Ltd, Slough
LeasePlan Versicherungsvermittlungsgesellschaft mbH, Düsseldorf
Accident Management Services B.V, Almere
Accident Management Services S.R.L., Bucharest
Fleet Accident Management Services Sp. z.o.o., Warsaw
Fleet Cover Sociedade Mediacao de Seguros Lda, Lisbon
Fleet Insurance Plan s.r.o., Prague
Garanthia Plan SL, Madrid
Societe de Courtages d'Assurances Groupe SARL, Paris

Appendix III: Quantitative Reporting Templates (“QRTs”)

The table below lists the annual disclosure quantitative templates submitted to the CBI in respect of 31 December 2021:

Code	Template Name
S.02.01.02	Balance Sheet
S.05.01.02	Premiums, claims and expenses by line of business
S.05.02.01	Premiums, claims and expenses by country
S.12.01.02	Life and Health SLT Technical Provisions
S.17.01.02	Non-Life Technical Provisions
S.19.01.21	Non-Life Insurance claims information
S.23.01.01	Own Funds
S.25.01.21	SCR - for undertakings on Standard Formula
S.28.01.01	MCR - for undertakings on Standard Formula

1. S.02.01.02

Balance sheet

Assets

Goodwill
Deferred acquisition costs
Intangible assets
Deferred tax assets
Pension benefit surplus
Property, plant & equipment held for own use
Investments (other than assets held for index-linked and unit-linked contracts)
Property (other than for own use)
Holdings in related undertakings, including participations
Equities
Equities - listed
Equities - unlisted
Bonds
Government Bonds
Corporate Bonds
Structured notes
Collateralised securities
Collective Investments Undertakings
Derivatives
Deposits other than cash equivalents
Other investments
Assets held for index-linked and unit-linked contracts
Loans and mortgages
Loans on policies
Loans and mortgages to individuals
Other loans and mortgages
Reinsurance recoverables from:
Non-life and health similar to non-life
Non-life excluding health
Health similar to non-life
Life and health similar to life, excluding health and index-linked and unit-linked
Health similar to life
Life excluding health and index-linked and unit-linked
Life index-linked and unit-linked
Deposits to cedants
Insurance and intermediaries receivables
Reinsurance receivables
Receivables (trade, not insurance)
Own shares
Amounts due in respect of own fund items or initial fund called up but not yet paid in
Cash and cash equivalents
Any other assets, not elsewhere shown
Total assets

	Solvency II value
	C0010
R0010	
R0020	
R0030	
R0040	
R0050	
R0060	2,467,482.04
R0070	377,820,017.46
R0080	
R0090	
R0100	
R0110	
R0120	
R0130	53,916,133.62
R0140	6,397,692.48
R0150	47,518,441.14
R0160	
R0170	
R0180	
R0190	
R0200	323,903,883.84
R0210	
R0220	
R0230	
R0240	
R0250	
R0260	
R0270	29,015,807.43
R0280	23,274,496.60
R0290	23,245,364.69
R0300	29,131.91
R0310	5,741,310.83
R0320	
R0330	5,741,310.83
R0340	
R0350	
R0360	36,823,466.20
R0370	
R0380	436,289.18
R0390	
R0400	
R0410	166,248,938.31
R0420	
R0500	612,812,000.62

Liabilities

Technical provisions - non-life
 Technical provisions - non-life (excluding health)
 TP calculated as a whole
 Best Estimate
 Risk margin
 Technical provisions - health (similar to non-life)
 TP calculated as a whole
 Best Estimate
 Risk margin
 Technical provisions - life (excluding index-linked and unit-linked)
 Technical provisions - health (similar to life)
 TP calculated as a whole
 Best Estimate
 Risk margin
 Technical provisions - life (excluding health and index-linked and unit-linked)
 TP calculated as a whole
 Best Estimate
 Risk margin
 Other technical provisions
 Contingent liabilities
 Provisions other than technical provisions
 Pension benefit obligations
 Deposits from reinsurers
 Deferred tax liabilities
 Derivatives
 Debts owed to credit institutions
 Financial liabilities other than debts owed to credit institutions
 Insurance & intermediaries payables
 Reinsurance payables
 Payables (trade, not insurance)
 Subordinated liabilities
 Subordinated liabilities not in basic own funds
 Subordinated liabilities in basic own funds
 Any other liabilities, not elsewhere shown
Total liabilities
Excess of assets over liabilities

	Solvency II value
	C0010
R0510	271,219,614.83
R0520	265,011,366.58
R0530	
R0540	245,769,454.74
R0550	19,241,911.84
R0560	6,208,248.24
R0570	
R0580	5,508,519.46
R0590	699,728.78
R0600	12,410,509.48
R0610	
R0620	
R0630	
R0640	
R0650	12,410,509.48
R0660	
R0670	10,064,584.59
R0680	2,345,924.89
R0690	
R0700	
R0710	
R0720	
R0730	
R0740	
R0750	
R0760	
R0770	
R0780	
R0790	
R0800	0.00
R0810	2,523,477.54
R0820	60,875,888.60
R0830	2,394,399.00
R0840	4,559,196.93
R0850	
R0860	
R0870	
R0880	
R0900	353,983,086.37
R1000	258,828,914.24

2. 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	Legal expenses insurance	Assistance	Miscellaneous financial loss	Total
C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0200
Premiums written												
Gross - Direct Business	R0110	11,211,061.19	112,594,396.14	98,550,428.91		365,115.58			1,618,920.26	5,090,058.78	11,315,118.55	240,745,099.41
Gross - Proportional reinsurance accepted	R0120		0.00	-29,831.78						0.00		-29,831.78
Gross - Non-proportional reinsurance accepted	R0130											
Reinsurers' share	R0140	0.00	3,786,484.14	2,273,843.74		0.00			0.00	809,721.11	0.00	6,870,048.99
Net	R0200	11,211,061.19	108,807,912.00	96,246,753.39		365,115.58			1,618,920.26	4,280,337.67	11,315,118.55	233,845,218.64
Premiums earned												
Gross - Direct Business	R0210	11,114,236.87	113,673,740.18	98,674,286.64		366,391.85			1,512,391.36	5,080,863.47	11,973,850.56	242,395,760.93
Gross - Proportional reinsurance accepted	R0220		0.00	-29,831.78						0.00		-29,831.78
Gross - Non-proportional reinsurance accepted	R0230											
Reinsurers' share	R0240	0.00	3,786,484.14	2,273,843.74		0.00			0.00	809,721.11	0.00	6,870,048.99
Net	R0300	11,114,236.87	109,887,256.04	96,370,611.12		366,391.85			1,512,391.36	4,271,142.36	11,973,850.56	235,495,880.16
Claims incurred												
Gross - Direct Business	R0310	2,097,217.97	60,130,534.33	62,354,921.81		-67,348.00			381,388.33	2,133,109.17	460,422.19	127,490,245.79
Gross - Proportional reinsurance accepted	R0320		0.00	161,357.93						0.00		161,357.93
Gross - Non-proportional reinsurance accepted	R0330											
Reinsurers' share	R0340	1.47	6,919,595.27	2,617,202.09		0.00			0.00	0.00	0.00	9,536,798.82
Net	R0400	2,097,216.50	53,210,939.06	59,899,077.64		-67,348.00			381,388.33	2,133,109.17	460,422.19	118,114,804.90
Changes in other technical provisions												
Gross - Direct Business	R0410	491,888.86	1,356,377.84	1,738,370.89		-57,274.11			126,918.86	-109,533.16	2,614,997.69	6,161,746.86
Gross - Proportional reinsurance accepted	R0420		0.00	-2,772,575.41						0.00		-2,772,575.41
Gross - Non-proportional reinsurance accepted	R0430											
Reinsurers' share	R0440	-0.33	902,455.52	-103,095.53		0.00			0.00	0.00	0.00	799,359.66
Net	R0500	491,889.19	453,922.31	-931,108.98		-57,274.11			126,918.86	-109,533.16	2,614,997.69	2,589,811.80
Expenses incurred												
R0550		2,043,667.04	25,490,362.47	12,563,764.84		98,240.07			148,488.14	704,803.19	714,297.02	41,763,622.77
Other expenses												
R1200												
Total expenses												
R1300												41,763,622.77

Premiums, claims and expenses by line of business

Premiums written

Gross	R1410
Reinsurers' share	R1420
Net	R1500

Premiums earned

Gross	R1510
Reinsurers' share	R1520
Net	R1600

Claims incurred

Gross	R1610
Reinsurers' share	R1620
Net	R1700

Changes in other technical provisions

Gross	R1710
Reinsurers' share	R1720
Net	R1800

Expenses incurred

Other expenses	R2500
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Total expenses

Total amount of surrenders	R2700
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Line of Business for: life obligations	Total	
Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations		
C0260	C0300	
0.00	0.00	0.00
0.00	0.00	0.00
0.00	0.00	0.00
0.00	0.00	0.00
0.00	0.00	0.00
0.00	0.00	0.00
-150,709.44	-150,709.44	-150,709.44
-150,709.44	-150,709.44	-150,709.44
0.00	0.00	0.00
-179,179.90	-179,179.90	-179,179.90
0.00	0.00	0.00
-179,179.90	-179,179.90	-179,179.90
0.00	0.00	0.00
		0.00

3. S.05.02.01

Premiums, claims and expenses by country

		Home Country	Total Top 5 and home country	Top 5 countries (by amount of gross premiums written) - non-life obligations				
R0010				(ES) Spain	(PT) Portugal	(NL) Netherlands	(PL) Poland	(NO) Norway
		C0080	C0140	C0090	C0090	C0090	C0090	C0090
Premiums written								
Gross - Direct Business	R0110	1,687,858.03	153,848,288.76	40,276,118.38	36,530,742.47	33,148,554.04	25,097,478.22	17,107,537.62
Gross - Proportional reinsurance accepted	R0120	-29,831.78	-29,831.78	0.00	0.00	0.00	0.00	0.00
Gross - Non-proportional reinsurance accepted	R0130							
Reinsurers' share	R0140	42,060.56	4,221,305.43	691,494.29	1,209,659.19	1,733,587.20	257,447.28	287,056.90
Net	R0200	1,615,965.69	149,597,151.55	39,584,624.09	35,321,083.28	31,414,966.84	24,840,030.94	16,820,480.72
Premiums earned								
Gross - Direct Business	R0210	1,538,088.80	150,562,049.83	36,146,851.82	36,807,610.51	33,373,797.32	24,945,489.67	17,750,211.71
Gross - Proportional reinsurance accepted	R0220	-29,831.78	-29,831.78	0.00	0.00	0.00	0.00	0.00
Gross - Non-proportional reinsurance accepted	R0230							
Reinsurers' share	R0240	42,060.56	4,221,305.43	691,494.29	1,209,659.19	1,733,587.20	257,447.28	287,056.90
Net	R0300	1,466,196.46	146,310,912.62	35,455,357.53	35,597,951.32	31,640,210.12	24,688,042.39	17,463,154.81
Claims incurred								
Gross - Direct Business	R0310	1,094,110.55	81,019,496.17	19,147,828.00	16,357,681.62	18,768,912.45	13,819,258.19	11,831,705.36
Gross - Proportional reinsurance accepted	R0320	161,357.93	161,357.93	0.00	0.00	0.00	0.00	0.00
Gross - Non-proportional reinsurance accepted	R0330							
Reinsurers' share	R0340	-68,915.27	5,352,606.46	-0.45	0.51	5,409,822.05	0.00	11,699.62
Net	R0400	1,324,383.74	75,828,247.64	19,147,828.45	16,357,681.11	13,359,090.40	13,819,258.19	11,820,005.75
Changes in other technical provisions								
Gross - Direct Business	R0410	2,385,237.74	7,819,729.79	1,128,323.26	561,386.24	1,438,658.71	1,096,113.02	1,210,010.82
Gross - Proportional reinsurance accepted	R0420	-2,772,575.41	-2,772,575.41	0.00	0.00	0.00	0.00	0.00
Gross - Non-proportional reinsurance accepted	R0430							
Reinsurers' share	R0440	-103,691.19	1,311,849.36	-102,182.76	323,825.30	1,168,460.10	-1,145.55	26,583.46
Net	R0500	-283,646.48	3,735,305.02	1,230,506.02	237,560.94	270,198.61	1,097,258.57	1,183,427.36
Expenses incurred	R0550	9,702,792.14	30,588,620.52	4,981,707.05	4,619,120.07	6,800,799.13	3,761,517.45	722,684.68
Other expenses	R1200							
Total expenses	R1300		30,588,620.52					

Premiums, claims and expenses by country

		Home Country	Total Top 5 and home country	Top 5 countries (by amount of gross premiums written) - life obligations			
	R1400						
		C0220	C0280	C0230	C0230	C0230	C0230
Premiums written							
Gross	R1410						
Reinsurers' share	R1420						
Net	R1500						
Premiums earned							
Gross	R1510						
Reinsurers' share	R1520						
Net	R1600						
Claims incurred							
Gross	R1610						
Reinsurers' share	R1620						
Net	R1700						
Changes in other technical provisions							
Gross	R1710						
Reinsurers' share	R1720						
Net	R1800						
Expenses incurred	R1900						
Other expenses	R2500						
Total expenses	R2600						

4. S.12.01.02

Life and Health SLT Technical Provisions

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

Best Estimate

Gross Best Estimate

Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default
Best estimate minus recoverables from reinsurance/SPV and Finite Re - total

Risk margin

Amount of the transitional on Technical Provisions

Technical provisions calculated as a whole

Best Estimate

Risk margin

Technical provisions - total

Insurance with profit participation	Index-linked and unit-linked insurance				Other life insurance		Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Accepted reinsurance	Total (Life other than health insurance, incl. Unit-Linked)	Health insurance (direct business)		Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Health reinsurance (reinsurance accepted)	Total (Health similar to life insurance)	
	Contracts without options and guarantees	Contracts with options or guarantees			Contracts without options and guarantees	Contracts with options or guarantees				Contracts without options and guarantees	Contracts with options or guarantees				
C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0150	C0160	C0170	C0180	C0190	C0200	C0210
							0.00		0.00						
							10,064,584.59		10,064,584.59						
							5,741,310.83		5,741,310.83						
							4,323,273.76		4,323,273.76						
							2,345,924.89		2,345,924.89						
							12,410,509.48		12,410,509.48						

5. S.17.01.02

Non-life Technical Provisions

Direct business and accepted proportional reinsurance													Total Non-Life obligation	
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			
C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0180		
Technical provisions calculated as a whole	R0010													
Total Recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole	R0050													
Technical provisions calculated as a sum of BE and RM														
Best Estimate														
Premium provisions														
Gross - Total	R0060		-4,102,329.57		-14,558,814.72		4,640,938.01			-532,179.32	-883,468.75	-7,020,060.21	-22,622,575.04	
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140		29,137.28		-3,353,630.36		-1,967,381.78		0.00		0.00	-314,892.55	0.00	-5,606,767.42
Net Best Estimate of Premium Provisions	R0150		-4,131,466.85		-11,205,184.36		6,608,319.79		-166,660.47		-532,179.32	-568,576.20	-7,020,060.21	-17,015,807.62
Claims provisions														
Gross - Total	R0160		9,610,849.04		225,304,449.94		32,476,372.33		140,674.35		1,127,635.09	554,414.65	4,686,153.83	273,900,549.25
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240		-5.37		25,556,008.52		3,325,286.83		-0.97		-15.72	0.64	-9.90	28,881,264.02
Net Best Estimate of Claims Provisions	R0250		9,610,854.41		199,748,441.42		29,151,085.50		140,675.33		1,127,650.82	554,414.01	4,686,163.74	245,019,285.23
Total Best estimate - gross	R0260		5,508,519.47		210,746,635.22		37,117,310.34		-25,986.12		595,455.77	-329,054.10	-2,333,906.38	251,277,974.21
Total Best estimate - net	R0270		5,479,387.55		188,543,257.06		35,759,405.29		-25,985.14		595,471.50	-14,162.18	-2,333,896.47	228,003,477.60
Risk margin	R0280		699,728.78		16,403,546.41		2,364,479.18		10,241.96		82,098.75	40,364.79	341,180.75	19,941,640.62
Amount of the transitional on Technical Provisions														
TP as a whole	R0290													
Best Estimate	R0300													
Risk margin	R0310													
Technical provisions - total														
Technical provisions - total	R0320		6,208,248.25		227,149,181.63		39,481,789.52		-15,744.16		677,554.52	-288,689.31	-1,992,725.63	271,219,614.83
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	R0330		29,131.91		22,202,378.16		1,357,905.05		-0.97		-15.72	-314,891.91	-9.90	23,274,496.60
Technical provisions minus recoverables from reinsurance/SPV and Finite Re- total	R0340		6,179,116.33		204,946,803.47		38,123,884.47		-15,743.18		677,570.25	26,202.61	-1,992,715.72	247,945,118.22

6. S.19.01.21

Non-life insurance claims information

Total Non-Life Business

Accident year / Underwriting year

Z0020	(1) Accident year
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Gross Claims Paid (non-cumulative)

		Development year										
(absolute amount)	Year	0	1	2	3	4	5	6	7	8	9	10 & +
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110
Prior	R0100											1,443,574.57
N-9	R0160	46,791,398.23	15,757,319.62	2,947,764.12	2,926,512.04	2,039,798.34	1,809,647.12	725,011.70	949,311.46	415,305.72	194,016.47	
N-8	R0170	43,130,263.48	16,954,843.44	3,832,033.24	2,886,236.87	1,640,491.64	1,227,644.11	628,827.87	1,397,740.10	187,068.68		
N-7	R0180	44,161,689.75	20,234,360.11	6,672,813.51	2,595,761.91	1,742,660.42	810,462.38	1,000,311.08	1,549,996.63			
N-6	R0190	47,767,415.81	26,089,903.96	5,985,212.95	3,657,985.41	2,038,527.95	1,752,020.18	942,987.11				
N-5	R0200	50,686,991.75	29,108,880.38	9,236,184.87	2,395,656.10	2,407,819.72	2,866,309.84					
N-4	R0210	58,358,648.68	34,363,943.61	10,758,680.79	2,476,033.11	3,467,147.68						
N-3	R0220	72,363,289.77	43,929,317.97	9,419,250.32	6,132,976.63							
N-2	R0230	80,616,380.44	38,820,458.15	7,986,774.04								
N-1	R0240	71,953,526.39	26,058,560.68									
N	R0250	70,313,367.51										

	In Current year	Sum of years (cumulative)	
	C0170	C0180	
R0100	1,443,574.57	1,443,574.57	
R0160	194,016.47	74,556,084.84	
R0170	187,068.68	71,885,149.41	
R0180	1,549,996.63	78,768,055.80	
R0190	942,987.11	88,234,053.36	
R0200	2,866,309.84	96,701,842.67	
R0210	3,467,147.68	109,424,453.88	
R0220	6,132,976.63	131,844,834.69	
R0230	7,986,774.04	127,423,612.63	
R0240	26,058,560.68	98,012,087.07	
R0250	70,313,367.51	70,313,367.51	
Total	R0260	121,142,779.86	948,607,116.44

Difference in Basis between above Triangle and Financial Statements:

The Company's paid claims triangles are produced using claims bordereaux provided by the Company's claims handlers. These bordereaux record the timing of payments made by the claims handlers themselves, and thus the triangles are produced based on these timings. These timings contrast to those used to produce the paid figure in the Company's Profit and Loss Account ("P+L"). In the P+L, the timings used are the point at which the Company makes payments to the claims handlers.

Other areas where there are differences between the basis used for the paid claims triangles and the P+L are: - Currency rates, i.e. point in time against built up over the reporting period; - adjustments made to the P+L for previous years; and - the timing of deductible refunds.

Gross undiscounted Best Estimate Claims Provisions

Year	Development year										
	0	1	2	3	4	5	6	7	8	9	10 & +
	C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300
Prior	R0100										13,466,724.45
N-9	R0160	0.00	0.00	0.00	10,202,656.77	5,585,925.62	4,662,592.44	5,467,461.26	2,792,022.95	6,823,455.24	
N-8	R0170	0.00	0.00	11,970,646.23	9,306,280.88	6,985,387.01	5,938,978.98	2,555,484.35	2,022,295.78		
N-7	R0180	0.00	0.00	21,181,902.72	14,832,863.82	9,306,460.43	8,177,475.75	5,144,945.51	4,057,157.64		
N-6	R0190	0.00	35,727,666.07	24,732,363.03	18,720,362.82	14,349,225.68	9,655,146.48	7,764,283.61			
N-5	R0200	74,439,644.07	47,672,415.15	28,850,668.20	21,677,473.33	13,620,262.67	8,333,560.36				
N-4	R0210	81,505,143.75	49,771,341.25	29,718,073.53	22,153,278.52	14,283,223.36					
N-3	R0220	93,066,337.12	64,356,238.50	48,746,812.67	31,988,282.09						
N-2	R0230	86,920,553.34	59,881,176.47	40,520,267.53							
N-1	R0240	91,831,894.10	47,925,577.02								
N	R0250	96,688,339.42									

Year end (discounted data)	
	C0360
R0100	13,491,303.08
R0160	6,823,498.01
R0170	2,028,952.10
R0180	4,067,769.37
R0190	7,786,420.45
R0200	8,359,844.76
R0210	14,293,429.79
R0220	32,017,869.35
R0230	40,504,152.25
R0240	47,856,097.89
R0250	96,671,212.21
Total	R0260 273,900,549.25

7. S.23.01.01

Own funds

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

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

Own funds from the financial statements that shall 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 shall not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds

Deductions

Deductions for participations in financial and credit institutions

Total basic own funds after deductions

Ancillary own funds

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

Total ancillary own funds

Available and eligible own funds

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

SCR

MCR

Ratio of Eligible own funds to SCR

Ratio of Eligible own funds to MCR

	Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
	C0010	C0020	C0030	C0040	C0050
R0010	679,000.00	679,000.00			
R0030	0.00	0.00			
R0040	0.00	0.00			
R0050					
R0070	0.00	0.00			
R0090					
R0110					
R0130	247,344,914.25	247,344,914.25			
R0140					
R0160					
R0180	10,805,000.00	10,805,000.00			
R0220	0.00				
R0230					
R0290	258,828,914.25	258,828,914.25			
R0300					
R0310					
R0320					
R0330					
R0340					
R0350					
R0360					
R0370					
R0390					
R0400					
R0500	258,828,914.25	258,828,914.25			
R0510	258,828,914.25	258,828,914.25			
R0540	258,828,914.25	258,828,914.25			
R0550	258,828,914.25	258,828,914.25			
R0580	113,857,413.51				
R0600	39,949,320.97				
R0620	227.3272%				
R0640	647.8932%				

Reconciliation reserve

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

Reconciliation reserve

Expected profits

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

Total EPIFP

	C0060
R0700	258,828,914.25
R0710	
R0720	0.00
R0730	11,484,000.00
R0740	
R0760	247,344,914.25
R0770	
R0780	36,003,073.18
R0790	36,003,073.18

8. S.25.01.21

Solvency Capital Requirement - for undertakings on Standard Formula

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0120
Market risk	R0010	27,094,831.90		
Counterparty default risk	R0020	15,615,683.10		
Life underwriting risk	R0030	878,909.27		
Health underwriting risk	R0040	39,105,410.93		
Non-life underwriting risk	R0050	92,556,259.48		
Diversification	R0060	-53,363,907.85		
Intangible asset risk	R0070	0.00		
Basic Solvency Capital Requirement	R0100	121,887,186.84		

Calculation of Solvency Capital Requirement

Operational risk	R0130	7,578,351.67
Loss-absorbing capacity of technical provisions	R0140	0.00
Loss-absorbing capacity of deferred taxes	R0150	-15,608,125.00
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	0.00
Solvency Capital Requirement excluding capital add-on	R0200	113,857,413.51
Capital add-on already set	R0210	0.00
Solvency capital requirement	R0220	113,857,413.51
Other information on SCR		
Capital requirement for duration-based equity risk sub-module	R0400	0.00
Total amount of Notional Solvency Capital Requirements for remaining part	R0410	
Total amount of Notional Solvency Capital Requirement 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

Approach based on average tax rate

Yes/No	LAC DT
C0109	C0130
R0590	(2) No

Calculation of loss absorbing capacity of deferred taxes

LAC DT	R0640	-15,608,125.00
LAC DT justified by reversion of deferred tax liabilities	R0650	0.00
LAC DT justified by reference to probable future taxable economic profit	R0660	-15,608,125.00
LAC DT justified by carry back, current year	R0670	0.00
LAC DT justified by carry back, future years	R0680	0.00
Maximum LAC DT	R0690	-15,608,125.00

9. S.28.01.01

Linear formula component for non-life insurance and reinsurance obligations

	C0010
MCRNL Result	R0010 39,858,532.22

	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 5,479,387.55	11,215,622.46
Workers' compensation insurance and proportional reinsurance	R0040	
Motor vehicle liability insurance and proportional reinsurance	R0050 188,543,257.06	108,773,413.79
Other motor insurance and proportional reinsurance	R0060 35,759,405.29	96,800,222.30
Marine, aviation and transport insurance and proportional reinsurance	R0070	
Fire and other damage to property insurance and proportional reinsurance	R0080 0.00	367,700.46
General liability insurance and proportional reinsurance	R0090	
Credit and suretyship insurance and proportional reinsurance	R0100	
Legal expenses insurance and proportional reinsurance	R0110 595,471.50	1,618,920.26
Assistance and proportional reinsurance	R0120 0.00	4,245,802.87
Miscellaneous financial loss insurance and proportional reinsurance	R0130 0.00	11,737,269.89
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
MCRL Result	R0200 90,788.75

	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 4,323,273.76	
Total capital at risk for all life (re)insurance obligations	R0250	

Overall MCR calculation

	C0070
Linear MCR	R0300 39,949,320.97
SCR	R0310 113,857,413.51
MCR cap	R0320 51,235,836.08
MCR floor	R0330 28,464,353.38
Combined MCR	R0340 39,949,320.97
Absolute floor of the MCR	R0350 3,700,000.00

Minimum Capital Requirement	R0400 39,949,320.97
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