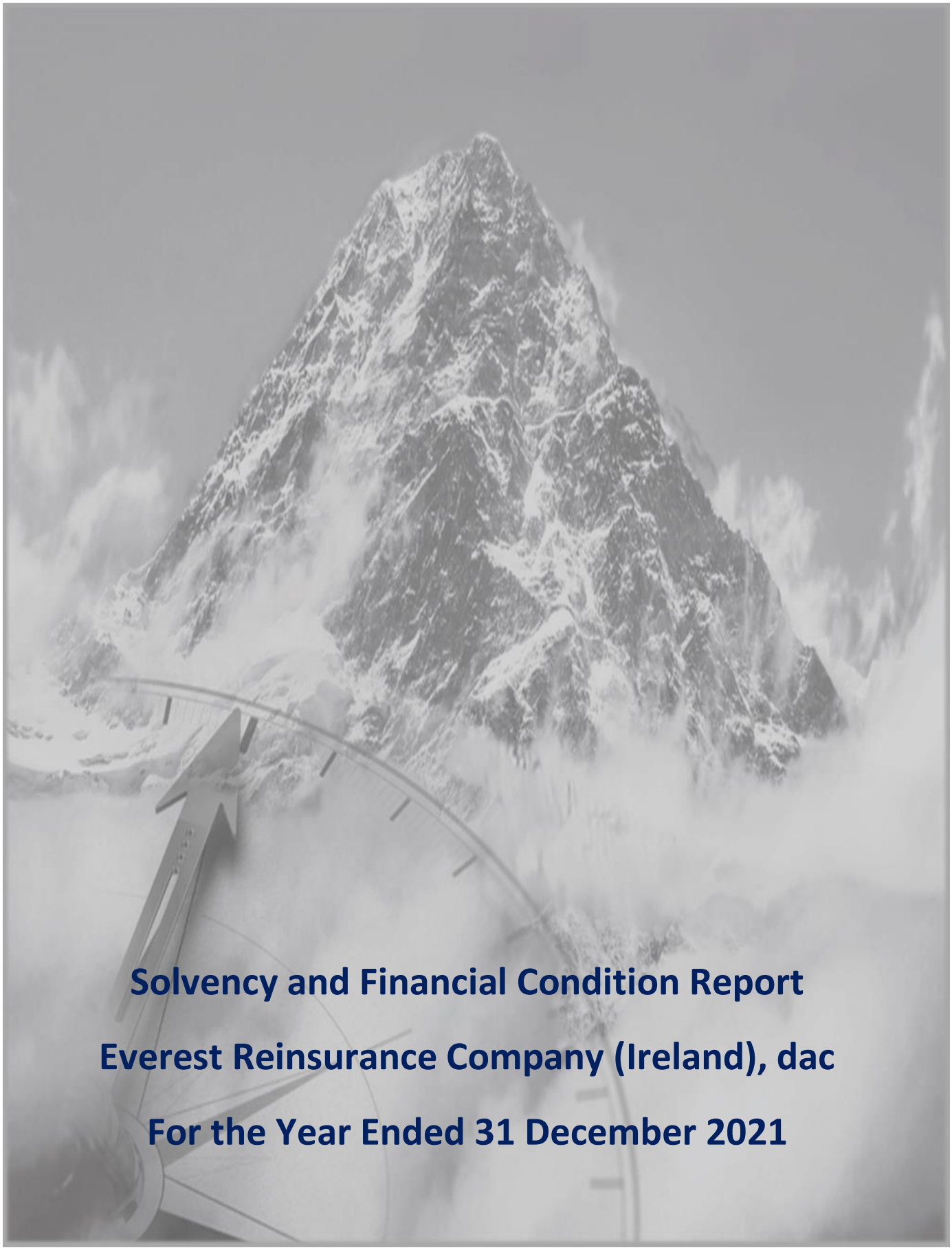
EVEREST



Solvency and Financial Condition Report

Everest Reinsurance Company (Ireland), dac

For the Year Ended 31 December 2021

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1. SUMMARY

Approval by the Board of Directors

This report was reviewed and approved by the Board of Directors of Everest Reinsurance Company (Ireland) dac on April 4th, 2022.

Independent auditors report

Narrative sections D, E.1, E.2, E.3 and E.6 of the Solvency and Financial Condition Report are subject to audit review by the Company's external auditors, KPMG.

The following Quantitative Reporting Templates ('QRTs'), which are included in the Appendix, are also subject to audit by KPMG.

Template ref	Template Name
S.02.01.02	Balance Sheet
S.17.01.02	Non-Life Technical Provisions
S.19.01.21	Non-Life Claims Information
S.23.01.01	Own Funds
S.25.01.21	Solvency Capital Requirement
S.28.01.01	Minimum Capital Requirement

The Company's reporting currency is Euro.

Key Solvency II Metrics

Solvency II Balance Sheet	**€'000 2021**	**€'000 2020**
Assets	1,282,538	934,599
Technical Provisions	787,630	494,952
Other Liabilities	96,188	51,144
Excess of Assets over Liabilities	398,720	388,503
Solvency Capital Requirement (SCR)		
Underwriting Risk	167,050	139,769
Counterparty Risk	30,389	20,392
Market Risk	120,567	133,775
Diversification Benefit	-73,048	-67,492
Basic SCR	244,957	226,443
Operational Risk	22,121	12,518
Solvency Capital Requirement	267,079	238,961

Minimum Capital Requirement (MCR)	66,770	59,740
Eligible Own Funds		
Tier 1 Basic Own Funds	398,720	388,503
Ratio of Eligible Own Funds to SCR	149%	163%
Ratio of Eligible Own Funds to MCR	597%	650%

1.1 Business and performance

Everest Reinsurance Company (Ireland), dac ('ERCID', 'the Company') is an Irish designated activity company licensed by the Central Bank of Ireland (CBI) to write all classes of non-life reinsurance business. The ultimate parent company is Everest Re Group Ltd ('Everest Re', 'the Group') which is a global (re)insurance company registered on the New York Stock Exchange.

The Company commenced writing business in 2010 and focuses on the provision of general property, casualty treaty reinsurance to (re)insurance companies ('cedants') domiciled predominantly in Continental Europe. It underwrites from its Dublin headquarters and through a branch office domiciled in Zurich, Switzerland.

The Company produces annual financial statements in accordance with Financial Reporting Standard FRS 102 & 103 ('FRS'). On this basis the Company produced a pre-tax profit for the year ended 31 December 2021 of €10.4m compared to a €14.5m loss in the prior period. Gross Written Premiums ("GWP") and Net Earned Premiums ('NEP') were €513.6m and €92.6m respectively compared to €370.2m and €123.2m in the prior period.

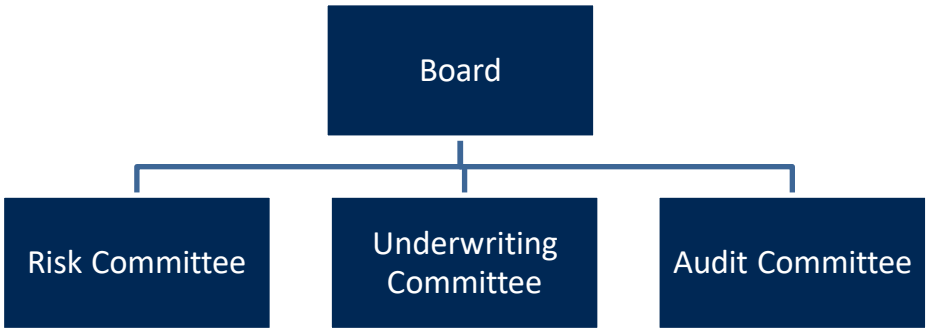
As at the period end the Company was rated 'A+ Strong' by Standard & Poor's and, 'A+ Superior' by A.M Best

There were no material changes to the Company's business profile in 2021 or at the time of publication.

1.2 System of governance

The Company is subject to the various requirements set out by the Central Bank of Ireland including the Corporate Governance Requirements for Insurance Undertakings 2015, the Probability Risk and Impact system ('PRISM') as well as those requirements imposed as part of the Everest Re Group.

The Company's Board of Directors sets corporate objectives and strategy and is responsible for ensuring that the Company's system of governance is appropriately maintained and delivered. The Company has set up a governance structure comprising of the Board and sub-committees as follows:



The Board recognizes the importance of strong corporate governance and oversees the framework and operation of the system through its Audit, Risk and Underwriting sub-committees.

The Chief Executive Officer ('CEO') is responsible for the day-to-day management of risk control within the business operations as well as delivering the strategy set by the Board and optimizing business performance within the governance and risk framework set by the Board.

The Chief Risk Officer ('CRO') and Compliance Officer ('CO') are functions independent from the operational departments and provide assurance to the Risk and Audit committees with regard to the overall operation and effectiveness of the risk management system.

Risk management, compliance, actuarial and internal audit are key functions in our system of governance. Each of these functions reports regularly to the Board, Risk Committee and/or Audit Committee.

Annual audits are carried out by the Internal Audit function. These provide the Board with an independent review of the activities of the CEO, CRO, Head of Finance, CO and operational departments. Findings and recommendations are reported directly to the Audit Committee.

All persons who are either involved in the day to day running of the Company or hold positions in key functions are required to demonstrate that they have the appropriate level of fitness and probity to fulfil the requirements of those roles. Those persons holding positions in key functions are subject to the Central Bank of Ireland's Pre-Approved Control Function (PCF) regime which requires pre-approval by the CBI before they can take up the position.

There were no material changes made to the Company's system of governance during 2021 or at the time of publication.

1.3 Risk profile

The Company maintains a risk register in line with the requirement of the Central Bank of Ireland's PRISM regime. The Board of Directors set the Company's risk appetite and assesses the risk profile on a regular basis. The Company carries out an Own Risk and Solvency Assessment ('ORSA') based upon its in-house economic capital model which it then compares to the Solvency Capital Requirement ('SCR') output from the SII Standard Formula model.

The Company carries out a wide-ranging assessment of the risks to which it is exposed. The Board has assessed these risks and considers that three key risks could either separately or in aggregate cause material impairment to capital:

- **Asset Risk**
  Asset or market risk is the risk that the fair value of future cash flows of a financial instrument will fluctuate because of changes in market prices.
- **Catastrophe Risk**
  This is the risk that a single event or series of events, of major magnitude, usually over a short period could lead to a significant deviation in actual claims from the total expected claims.
- **Long Tail Reserving Risk**
  Casualty classes of business carry a long settlement period and a risk of inherent volatility. Long-tail risk arises when actual claims experience differs adversely from the assumptions included in setting reserves, in large part due to the length of time between the occurrences of a loss, the reporting of the loss and the ultimate payment of the claim.

These risks are monitored on a regular basis using an internal economic risk model and management system. These are described in more detail in Section C below.

The Company purchases both whole account quota share and catastrophe excess of loss reinsurance from Group affiliated entities to limit risk exposure, reduce volatility and to maintain a level of capital above the Solvency II SCR as set by the Risk Committee of the Board of Directors, which is periodically reviewed to ensure that it is aligned to Board approved risk appetite.

There were no material changes to the Company's risk profile during 2021.

1.4 Valuation for solvency purpose

In Section D below the Company sets out its approach to valuing assets and liabilities under Solvency II. The Company carried out a reconciliation of differences between the valuation of assets and liabilities made under FRS and Solvency II. These include the valuation of technical provisions and reinsurance recoveries and the exclusion of certain assets and liabilities. The reconciliation for the year ended 2021 is disclosed in section D.

There were no material changes to the Company's method of valuation for solvency purpose during 2021 or at the time of publication.

1.5 Capital management

The Company aims to hold sufficient own funds in order that it maintains a margin to cover the solvency Capital Requirement and Minimum Capital Requirement ('MCR') in line with the Board approved risk appetite. Further details on capital management policies can be found in section E below.

As at 31 December 2021 Tier 1 Basic Own Funds were €398.7 (prior year €388.5m) with a Solvency Capital Requirement of €267.1m (prior year €239.0m) resulting in a Solvency II SCR ratio of 149% (prior year 163%). The MCR at 31 December 2021 was €66.8m (prior year €59.7m). The year over year increase in required capital can be attributed to planned growth in preferred business segments such as financial lines, casualty and marine as well as elevated reserves due to the COVID-19 pandemic and several significant catastrophe events.

There were no material changes to the Company's method of capital management during 2021 or at the time of publication.

A. BUSINESS AND PERFORMANCE

A.1 Business profile

A.1.a Name and legal form of the undertaking

Everest Reinsurance Company (Ireland), dac Incorporated in the Republic of Ireland.

Registered Address:
70 Sir John Rogerson's Quay,
Dublin,
D02 E296,
Ireland.

A.1.b Name and contact details of the supervisory authority responsible for the financial supervision of the undertaking

The Central Bank of Ireland
New Wapping Street,
North Wall Quay,
Dublin,
D01 F7X3.

A.1.c External Auditor of the undertaking

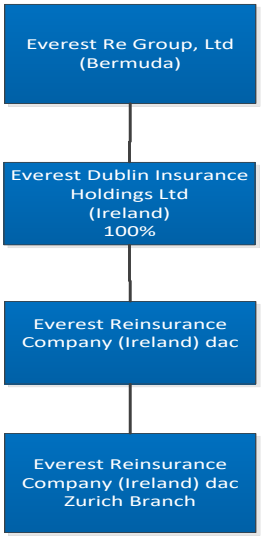
KPMG,
1 Harbourmaster Place,
IFSC,
Dublin,
D01 F6F5.

A.1.d Description of the holders of qualifying holdings in the undertaking

Name of Related Undertaking	Legal Form	Country	Participating Undertaking	Proportion of Ownership Interest Held by the Participating Undertaking	Proportion of Voting Rights Held by the Participating Undertaking
Everest Reinsurance Company (Ireland), dac	Limited by shares	Ireland			
Everest Dublin Insurance Holdings Limited (Ireland)	Limited by shares	Ireland	Everest Reinsurance Company (Ireland), dac	100%	100%
Everest Re Group, Ltd. (Bermuda)	Limited by shares	Bermuda	Everest Dublin Insurance Holdings Limited (Ireland)	100%	100%

A.1.e Details of the undertakings position within the legal structure of the Group

The Company is a designated activity Company and is part of the Everest Re Group



A.1.f Material lines of business and material geographical areas in which Business is carried out

Gross Written Premium generated by underwriting year 2021 has been sourced as follows:

Line of Business €'000				
GWP	**2021**		**2020**	
Property	189,054	36.8%	134,135	36.2%
Professional Lines	138,646	27.0%	72,105	19.5%
Marine, Aviation and Transport	81,642	15.9%	75,819	20.5%
Credit & Surety	66,565	13.0%	72,031	19.5%
Motor	37,053	7.2%	15,293	4.1%
Accident & Health	655	0.1%	820	0.2%
Total	**513,615**	**100%**	**370,202**	**100%**

Cedant Domicile €'000

Country	2021		2020	
France	175,130	34.10%	133,628	36.10%
Germany	138,212	26.90%	61,396	16.60%
Bermuda	24,689	4.80%	18,854	5.10%
Spain	23,917	4.70%	22,943	6.20%
United Kingdom	22,376	4.40%	30,042	8.10%
Italy	17,256	3.40%	12,051	3.30%
Switzerland	14,091	2.70%	15,645	4.20%
Denmark	12,832	2.50%	13,658	3.70%
Poland	10,969	2.10%	3,220	0.90%
Belgium	10,445	2.00%	9,308	2.50%
Other	63,698	12.40%	49,457	13.30%
Total	**513,615**	**100.00%**	**370,202**	**100.00%**

A.1.g Significant business or other events over the reporting period that have had a material impact on the Company

Storm Bernd had a significant impact on the Company's underwriting performance for the year. There were no other significant events over the reporting period that have had a material impact on the Company.

A.2 Underwriting performance

Performance by line of business (€'000)

Period Ending 31-Dec-21	Income Protection	Motor vehicle liability	Marine Aviation and Transport	Fire and other damage to property	General liability	Credit and suretyship	Total
Net Earned Premium	240	6,131	19,294	24,186	27,309	15,461	92,621
Net Incurred Claims	372	4,144	14,867	36,150	20,698	8,800	85,031
Expenses Incurred	56	-622	2,974	6,680	5,654	4,633	19,375
Underwriting Profit /-Loss	(188)	2,609	1,454	(18,644)	957	2,027	(11,785)

Period Ending 31-Dec-20	Income Protection	Motor vehicle liability	Marine Aviation and Transport	Fire and other damage to property	General liability	Credit and suretyship	Total
Net Earned Premium	214	4,788	27,263	44,312	19,014	27,597	123,187
Net Incurred Claims	196	3,637	19,605	43,139	16,258	16,029	98,863
Expenses Incurred	48	2,034	4,627	9,540	6,816	10,507	33,571
Underwriting Profit /-Loss	(30)	-883	3,032	(8,367)	(4,060)	1,061	(9,248)

A.3 Investment Performance

A.3.a Income and expenses arising from investments by asset class

The Board of directors is responsible for establishing investment policy and guidelines and, together with senior management, for overseeing their execution.

The Company's principal investment objectives are to ensure funds are available to meet its reinsurance obligations and to maximize after-tax investment income while maintaining a high-quality diversified investment portfolio. Considering these objectives, the Company views its investment portfolio as having two components:

1) the investments needed to satisfy outstanding liabilities (its core fixed maturities portfolio) and

2) investments funded by the Company's shareholders' equity.

For the portion needed to satisfy outstanding liabilities, the Company has invested in taxable and tax-preferenced fixed income securities with 68.5% rated A or higher at 31 December 2021. The portfolio is externally managed by an independent, professional investment manager using portfolio guidelines approved by the Board and is adjusted periodically, consistent with current and projected market conditions and the Company's risk appetite.

The duration of an investment is based on the maturity of the security but also reflects the payment of interest and the possibility of early prepayments. The Company's fixed income investment guidelines include a general duration guideline. This investment duration guideline is established and periodically revised by management, which considers economic, and business factors, as well as the Company's average duration of potential liabilities, based on the estimated pay-outs of underwriting liabilities using standard duration calculations.

For each currency in which the Company has established substantial loss and loss adjustment expense (LAE) reserves, the Company seeks to maintain invested assets denominated in such currency in an amount approximately equal to the estimated liabilities with any surplus held in EURO or USD.

The Company's invested assets totalled a €658.4m market value as per the table below.

Investments	**Market Value 2021**	**Market Value 2020**
	2021	**2020**
	€'000	**€'000**
Government Bonds	164,435	191,058
Corporate Bonds	440,372	419,437
Collective Investment undertakings	53,613	34,806
TOTAL	**658,419**	**645,301**

The market value of the Company's investment portfolio didn't vary significantly in the period.
The split of bonds by credit rating on a market value basis is as follows (excluding accrued interest):

Bond Credit Rating	Market Value 2021 €'000	Market Value 2020 €'000
AAA	130,479	207,703
AA+	15,275	18,792
AA-	26,158	40,796
AA	57,249	38,552
A+	100,647	91,637
A-	70,436	52,903
A	47,096	92,509
BBB+	95,351	47,229
BBB-	43,979	14,320
BBB	48,914	25,823
BB-	896	-
N/R	17,147	10,492
TOTAL	**653,626**	**640,756**

A.3.b Information about any gains and losses recognized directly in equity

The Company has no gains and losses recognized directly in equity.

A.3.c Information about any investments in securitisation

The Company does not hold any investments in securitisation

A.4 Performance of other activities

The Company has the following other material income and expenses:

	2021 €'000	2022 €'000
Foreign exchange revaluation -losses/gains and other costs	1,288	2,160

A.5 Any other material information

The Company evaluates, on a continuous basis, loss exposures to events such as the Russian invasion of Ukraine. As an ongoing event there are significant uncertainties regarding actual losses incurred and the potential application of coverage to those losses. In our view, the main areas of potential exposure are the Marine, Trade Credit and Credit & Political Risks lines of business, however at the time of publication our assessment does not indicate significant direct loss exposures to such events. We will continue to monitor this situation as it evolves and going forward the Company's executive management, supported by Everest Group, will closely monitor any current or future exposures.

B. SYSTEM OF GOVERNANCE

B.1 General Information on the system of governance

B.1.a The structure of the Company's administrative, management or supervisory body and key functions

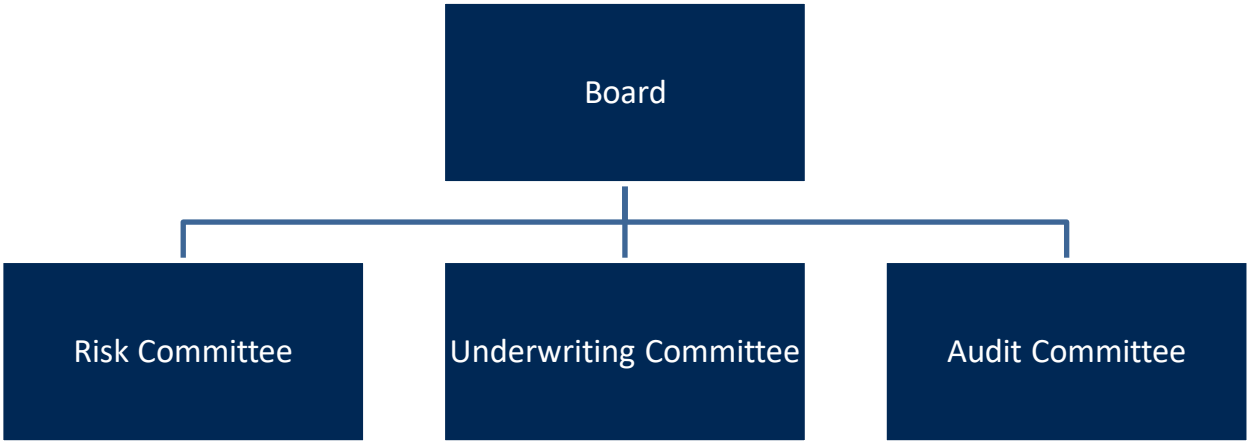
Responsibility for the design and oversight of the Company's systems of governance, in line with the Corporate Governance Requirements for Insurance Undertakings 2015 by the Central Bank of Ireland, resides with the Board of Directors.

The Board is primarily responsible for:

- Setting strategy and approval of the Company's business plan;
- Ensuring that the CEO and executive management implement the strategy and report on actual performance against the business plans;
- Ensuring that an appropriate system of internal control, including compliance, is in place and operating effectively;
- Assessing and monitoring the major risks facing the Company and ensuring that an appropriate risk management framework is developed and implemented by management
- Monitoring capital adequacy. Validation of the standard formula and SCR, ensuring that the minimum SCR and MCR are maintained at all times;
- Ensuring that the Company complies with all relevant laws and regulations.

The Board has formed a Risk Committee, Audit Committee and Underwriting Committee to which it has formally delegated specific functions. However, this delegation does not remove or absolve its members of their responsibilities to the Company. Both the Board and Committees are constituted in such a way as to meet the requirements of the Central Bank of Ireland's code: *Corporate Governance Requirements for Insurance Undertakings 2015*.

Board committees



Risk committee

The Risk Committee is responsible for providing oversight and advice to the Board on current risk exposures and future risk strategy. It assists the Board in setting and monitoring the Company's risk appetite and key risks as well as the maintenance and oversight of the risk register. It also oversees matters relating to compliance management.

The Committee is composed of the two Independent Non-Executive directors ('INED's') (one of whom is its Chairman), the CEO and a non-executive director. It meets prior to each scheduled Board meeting and accepts presentations from the Compliance Officer and Chief Risk Officer. The Committee Chairman may call

additional meetings as and when deemed appropriate, the minutes of which will be submitted at its next meeting.

The Committee's responsibilities and level of authority are set out in the Terms of Reference document which is reviewed and approved by the Board on an annual basis. Key responsibilities are:

- Advising the Board on risk appetite and risk tolerance taking account of the Board's overall risk appetite
- Advising the Board on proposed strategic solvency targets
- Overseeing the Company's risk management system, policies, and procedures
- Overseeing the risk management function as managed on a day-to-day basis by the CRO
- Liaising regularly with the CRO to ensure the development and ongoing maintenance of an effective risk management system that is effective and proportionate to the nature, scale and complexity of the risks inherent in the business
- Ensuring the effectiveness of strategies and policies with respect to maintaining, on an ongoing basis, amounts, types and distribution of both internal capital and own funds adequate to cover the risks of the organisation
- Overseeing the Company's compliance with statutory and regulatory requirements
- Participating in and monitoring the ORSA process and outcomes and ensuring that the ORSA is implemented effectively within the Company
- Reviewing certain large transactions referred by the Underwriting Committee
- Monitoring compliance with legal and regulatory requirements and
- Reviewing the annual compliance plan and reviewing the outcomes of the compliance monitoring programme of the Company.

Audit committee

The Audit Committee is responsible for oversight of financial reporting and associated internal controls as well as the performance of both internal and external audits. The Committee provides a link between the Board and the independent internal and external auditors.

The Committee is composed of three directors, two of whom are INED's (one of which is Chairman of the Committee) and one Non-Executive Director. It meets prior to each scheduled Board meeting and accepts presentations from the CEO and Head of Finance on operational and financial matters, as well as periodic reports from the Head of Internal Audit function and external Audit Partner. The Committee Chairman may call additional meetings as and when deemed appropriate, the minutes of which will be submitted at its next meeting.

The Committee's responsibilities and level of authority are set out in the Terms of Reference document which is annually reviewed and approved by the Board. Key responsibilities are:

- Monitor the effectiveness of the Company's internal controls, internal audit function and information technology ('IT') systems.
- Ensure that the findings and recommendations of both the internal and external auditors are communicated to the Board and acted upon in a timely manner.
- Approve the appointment of the internal and external auditors, assessing both their independence and effectiveness.
- Review the scope of the audit plans presented by the external and internal auditors.
- Review the Company's interim and annual financial statements in conjunction with executive management and, on an annual basis, with the external auditor.
- Assess the effectiveness of the Company's internal financial control processes, investigating any material breaches and recommending corrective action if required.

- Review the Company's accounting policies and any significant matters raised by external and internal auditors.

Underwriting committee
The Underwriting Committee assists the Board in establishing and overseeing the Company's underwriting policies and procedures, and reviewing compliance with the Company's Underwriting Principles.

The Committee is composed of the Zurich Branch Manager, Chief Executive Officer, Head of Underwriting and a Non-executive Director. Meetings take place to coincide with scheduled Board meetings or at other such times deemed to be appropriate. The Chairman of the Committee will make a report to the Board.

To fulfil its responsibilities and duties the Underwriting Committee shall:

- Delegate to underwriters' levels of acceptance, defined by Premium, limit and class.
- Set aggregate limits for all appropriate classes and territories.
- Periodically review rating and other underwriting tools and approve or amend as necessary.
- Review and sign off of risks referred by underwriters which are outside of Head of Underwriter's authority limits as stated per the Letter of Authority.
- Review all underwriting transactions which fall outside of delegated authority limits and either approve or provide underwriters with specific individual authority delegations.
- Review significant underwriting transactions where the Company's written premium exceeds a specific amount, as pre-determined by the Board on a per-cedant basis.
- Involve the Risk Committee in the decision process for significant signings.

General Information on Key Functions

The Company's risk management, compliance, actuarial and internal audit functions are the key functions in its system of governance. Each of these functions reports regularly to the Board, Risk Committee and /or Audit Committee. The functions may draw upon support from Group where appropriate but also may engage external resources (whether systems, tools, or people) as required.

Risk function
Primary responsibility for the Risk function has been delegated by the Board to the Risk Committee. The CRO has a standing invitation to the meetings of the Risk Committee to whom they provide a regular verbal and written report.

The CRO is responsible for ensuring that business decisions made by the executive management fall within the Company's risk appetite and strategy. The CRO reports directly into the Group Enterprise Risk Management department based in New Jersey, USA.

Compliance function
The Company's compliance function is headed up by the CO. The CO provides periodic reports to the Risk Committee and is independent from the executive functions. The key responsibilities of the Compliance Function are detailed in section B.4.5.b below. The function is primarily responsible for oversight and compliance with the requirements of the regulatory environment in which the Company operates; mitigation of risk of financial crime, data protection and ensuring adherence to internally published company policies and procedures.

Actuarial function
The actuarial function is headed by the CRO and Senior Branch Actuary in Zurich who holds the role of Head of Actuarial Function ('HoAF'), as set out by the Central Bank of Ireland's Fitness and Probity regime. The key responsibilities of the HOAF are detailed below in section B6.

The Company is in the process of splitting the CRO and HoAF functions and is seeking approval from the CBI to appoint a new HoAF.

Internal Audit function

The purpose of the Internal Audit function is to provide independent, objective assurance and consulting services designed to add value and improve the Company's operations. It helps the Company accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, internal control, and governance processes.

Effective from July 2021, the internal audit process is outsourced by the Company to Mazars. Further oversight and support are provided by the Group Internal Audit department based in New Jersey, USA who carries out audits under the direction of the Group audit committee as and when required. The Board believes that this arrangement provides an enhanced level of independent oversight both from a local and global perspective.

B.1.b Material changes in the system of governance in the reporting period

There were no material changes in the system of governance in the reporting period.

B.1.c Remuneration policy

B.1.c.i Principles of remuneration policy

The Company's remuneration program is designed to attract, retain and motivate individuals whose abilities are important to the success of the Company while also ensuring that such practice is consistent with, and promotes, sound and effective risk management. To achieve these ends, the Company's remuneration program utilizes a short-term component, consisting of a fixed base salary, plus an annual, variable, merit-based discretionary bonus. In addition to this the Company may offer a long-term component, consisting of discretionary equity awards in the form of restricted share awards of stock in Company's ultimate parent, Everest Re Group, Ltd.

Short term remuneration is designed to attract, reward, and retain employees for achieving optimal performance in the current year. Long term remuneration is designed to align the interests of the Company's senior management with those of the Group's shareholders by incentivizing employees to work towards achieving the Group's long-term goals.

Remuneration is based on the level of job responsibility, individual performance, and contribution to the performance of the Company.

Remuneration awards are generally intended to be reasonably competitive with the open market to minimise the potential for disruptive turnover amongst key roles.

Employees are also entitled to receive additional forms of compensation including:

- Company funded pension plan;
- Company paid life insurance;
- Medical insurance and;
- Disability insurance.

B.1.c.ii Information on the individual and collective performance criteria on which any entitlement to share options, shares or variable components of remuneration is based

Company executives may be offered a long-term remuneration component through the Everest Re Group, Ltd. 2020 Stock Incentive Plan, as adopted by the Group's shareholders in May 2020 (the '2010 Stock Incentive Plan'). Awards under the 2010 Stock Incentive Plan are intended to reinforce management's long-term perspective on corporate performance, provide an incentive for key executives to remain with the Company for the long-term, and provide a strong incentive for employees to work to increase shareholder value by aligning key executives' interests with the Group's shareholders.

Awards under the 2020 Stock Incentive Plans may take the form of share options, share appreciation rights, restricted shares or share awards. To date, the Group Board of Directors has only awarded restricted shares and non-qualified share options pursuant to the Plan. In 2021 only restricted shares were awarded. Restricted shares are awarded on the day that they are granted by the Group's Board of Directors and valued as of the grant date. Restricted share awards vest over a five-year period at the rate of 20% per year and are generally forfeited if the recipient leaves the Company before vesting. Generally, upon termination of employment, the recipient loses unvested options and restricted shares and has 90 days to exercise vested options. In general, equity awards are considered and granted to eligible individuals once per year by the Board of directors of Everest Re Group Ltd and are in the subjective judgment and discretion of the Group's Board of directors based upon recommendation received from the Company's executive management. The Group Board has not identified any specific factors or particular criteria that must be met by particular members of the Company's senior management and does not assign any relative weighting to any factors or criteria it considers. Rather it exercises its subjective judgment and discretion by taking into account all factors that it deems relevant. Examples of factors that the Group Board has utilised include the recipient's demonstrated past and expected future performance, the recipient's level of responsibility within the Company, his/her ability to affect shareholder value, and past awards of share options, share appreciation rights, restricted shares, or share awards.

B.1.c.iii A description of the main characteristics of supplementary pension or early retirement schemes for members of the administrative, management or supervisory body and other key function holders

The Company operates a pension plan for all staff, regardless of level of seniority, on a defined contribution basis. Employees are subject to the standard rules of the schemes in place at their place of work. Independent non-executive directors of the Board receive a fixed annual fee as remuneration and are not members of the supplementary pension scheme. Members of the administrative, management or supervisory body and other key function holders who are not directly employed by the Company are subject to the schemes provided by their employer.

B.1.d Material transactions during the reporting period with shareholders, with persons who exercise a significant influence on the undertaking, and with members of the administrative, management or supervisory body and other key function holders

There were no material transactions during the reporting period.

B.2 Fit and proper requirements

B.2.a A description of the undertakings specific requirements concerning skills, knowledge and expertise applicable to the persons who effectively run the undertaking or have other key functions

The Company is required to fulfil the minimum requirements as set out by the CBI in Fitness and Probity Standards 2014. The Company is required to nominate employees in specific control function ('CF') roles and in certain cases obtain the pre-approval of the CBI, by completing online individual questionnaires, before appointing individuals to Pre-approved Controlled Functions ('PCF') roles.

The Company requires that a person who holds a PCF or CF role can demonstrate that they have the necessary competence and proficiency to undertake the relevant function, have a sound knowledge of the

business, and their specific responsibilities together with a clear and comprehensive understanding of the legal/ regulatory obligations to undertake that function.

Chief Executive Officer ('CEO')

The CEO is designated as (PCF-8) and Executive Director (PCF-1) with overall responsibility for the operation of the Company, the CEO is the most senior executive of the Company and is the link between management and the Board. The CEO reports directly to the Chairman of the Board.

Head of Actuarial Function ('HoAF')

The role of HoAF is designated at PCF-48 by the CBI and is currently held by the CRO and Group Accumulation Lead in ERCID's Zurich Branch Office. The HoAF has over eighteen years of industry experience and is a Fellow of the Casualty Actuarial Society. HoAF is supported by staff that hold, or are training towards, internationally recognized actuarial qualifications. HoAF support is based mainly in Everest's London office working under the Chief European Actuary for Everest Advisors UK Ltd, a Group affiliate. The actuarial function shall possess, and be able to demonstrate, appropriate knowledge of actuarial and financial mathematics commensurate with the nature, scale, and complexity of the risks of the Company and:

- have the necessary skill and experience;
- have not been disqualified by their professional body;
- be competent and capable;
- be honest, ethical, and act with integrity; and
- be financially sound.

Chief Risk Officer ('CRO')

The role of CRO is designated at PCF-14 by the CBI and held by the Group Accumulation Lead in the Zurich Branch. The Board has satisfied itself that:

- The CRO has demonstrated that he has the relevant expertise gained in risk management/ actuarial science supported by appropriate formal qualifications and has confirmed continued professional development.
- Has sufficient seniority and independence to influence proposals or challenge decisions which affect an insurance undertaking's exposure to risk.

With effect from 25th March 2019 the CRO assumed the role of HOAF and was approved by the CBI.

Head of Compliance ('HoC')
The HoC is designated at PCF-12 by the CBI and held by a direct employee of the Company. The HoC is independent of the executive function. The HoC has demonstrated knowledge of legislation and regulatory matters impacting the Company and be able to articulate these to the Board.

Head of Internal Audit ('HoIA')
The role of HoIA is designated at PCF-13 by the CBI and held by a nominated senior officer of a firm of Dublin based Chartered Accountants and is independent of the executive function.

The internal audit plan sets out the internal audit approach and methodology which will be applied in undertaking the internal audit program. The plan facilitates:

- Production of Internal Audit Reports for the Audit Committee on the system of internal control;
- Auditing ERCID's risk management, governance and internal control arrangements through an internal audit plan, prioritised according to the key objectives and risks;
- Identifying the audit resources required to deliver the internal audit program in accordance with the required professional standards;
- Provision to senior management and the Audit Committee of recommendations resulting from audit work which are intended to improve the internal control, risk management and governance environment; and
- Co-operating and communicating effectively with ERCID's Statutory Auditors, Group Internal Audit and the CBI.

Head of Finance ('HoF')
The HoF is designated at PCF-11 (Head of Finance) by the CBI and held by a direct employee of the Company, who reports to the CEO of the Company. The HoF is responsible for the financial reporting of the Company and demonstrated knowledge of accounting and regulatory matters impacting the Company and be able to articulate these to the Board.

Head of Underwriting ('HoU')
The HoU is designated as PCF-18 by the CBI and is responsible for the underwriting process and strategy in the Company. The HoU is assisted in this role by a team of experienced underwriters who operate under delegated authorities overseen by the Underwriting Committee and approved by the Board.

Head of Claims ('HoC')
The HoC is designated as PCF-43 by the CBI and is responsible for the claims process and strategy in the Company. As the claims function is outsourced to a Group company the HoC function is held by a group employee. The HoC is assisted in this role by a team of experienced claim handlers who operate under the terms of the outsourcing contract. The HoC makes a presentation on claim developments at each scheduled meeting of the Board.

B.2.b A description of the undertakings process for assessing the fitness and the propriety of the persons who effectively run the undertaking or have other key functions

Where the Company has determined that an individual is appropriate for the role of PCF, the application process is undertaken for the submission of the individual questionnaire via the CBI Online System. The process involves:

- Completing the relevant sections of the individual questionnaire ('IQ') by both the applicant and proposer
- Documentation of supporting experience and relevant qualifications
- Declaration by the proposed holder of the PCF of the accuracy and veracity of the information provided
- Declaration by an appropriate officer confirming the checks of the individual were undertaken by the Company (e.g. appropriate due diligence with regard to qualifications and experience, previous employer reference checks etc.) and confirming that the Company is satisfied that the proposed holder of the PCF is fit and proper.

When the CBI confirms their approval of the appointment, the individual may commence their PCF role within the Company. The ongoing monitoring, including annual declarations and due diligence shall be the responsibility of the Head of Compliance.

Persons undertaking CFs roles are notified in writing by the Head of Compliance of their obligations under the Fitness and Probity standard, the letter will also identify the relevant Control Function code. The ongoing monitoring, including annual declarations and due diligence shall be the responsibility by the Head of Compliance and the Human Resource unit for certain aspects.

In the cases where employees are not required to be nominated into control function roles the Company ensures that the employees are able to fulfil the requirements of their roles by holding such professional qualifications, knowledge and experience that would be reasonably expected by a knowledgeable third party and are of good repute and integrity.

The Company has a process in place to enable the annual confirmation to the CBI that the Company is in compliance with the relevant regulatory requirements under the CBI's Fitness and Probity Standards 2014 and associated CBI Guidance (the "Fitness and Probity Standards"). In addition to this the company has adopted the standards and recommendations as recommended by the CBI per their 'Dear CEO' letter of 17th November 2020.

These processes will ensure that all relevant persons meet, and continue to meet, the Fitness and Probity Standards and fulfil any training obligations.

The Company has in place a Fitness and Probity policy document which covers:

- Recruitment of persons undertaking PCF and CF roles
- Individuals performing PCFs and CFs on a temporary basis
- Outsourcing of PCFs and CFs
- On-going due diligence of individuals performing PCFs and CFs. Each CF and PCF holder must complete annual declarations on conflicts of interests, reputation and character, and civil and criminal record
- Addressing the consequences where a person's circumstances change and can no longer able to meet the F&P standard.

B.3 Risk management system including the Own Risk and Solvency Assessment (ORSA)

B.3.a Description of the risk management system comprising strategies, processes and reporting procedures, and how the Company is able to effectively identify, measure, monitor, manage and report, on a continuous basis, the risks on an individual and aggregated level, to which the Company is or could be exposed

The assumption of risk is central to the industry in which the Company operates. The Board of Directors provides direction to executive management by setting the Company's risk appetite and identifying the principal risks faced by the Company which are articulated in a risk register based on the CBI PRISM regime. The Board has identified three key risks which it believes could have the potential to cause material impairment of the Company's solvency position based on both the ECM and standard formula SCR. At the time of reporting the Company considers the following risks to be key:

- Asset Risk
- Catastrophe Risk
- Long Tail Reserving Risk

The Board delegates to the CEO and executive management primary responsibility for day-to-day risk management and control. The Company utilizes three lines of defence to identify, control and mitigate risk across all of its functions and to feedback information to the Board on the efficiency of the control system.

- **First line of defence**: Operational management assumes ownership of day-to-day business processes which assess, control and mitigate operational risk. These take the form of written policies and procedures.
- **Second line of defence**: the Risk Management function, Compliance function as well as expert functions, such as Actuarial and Finance, oversee the risk management framework and provide feedback to executive management and the Board.
- **Third line of defence**: the Internal Audit function provides independent assurance to the Board in respect of the effectiveness of risk management and controls.

B.3.b Description of how the risk management system including the risk management function are implemented and integrated into the organizational structure and decision-making processes

The majority of the reinsurance contracts written by the Company incept 1st January and have twelve-month duration. The Group Economic Capital Model generates the Company's internal capital requirement based on an annual plan prepared in Q4.

Underwriters are provided with guidelines and specific levels of authority that limit the size and type of risk written. Actual performance is monitored against plan both at entity and Group level. The Group ERM function provides regular updates on the key risk position versus appetite and prior period to enable the Board to monitor risk position against appetite and tolerance.

Asset Risk is assessed on a quarterly basis and investment decisions are controlled by investment guidelines. The Company chooses to invest in mainly low volatility, highly rated sovereign or corporate bonds. Asset durations and currency exposures are matched to liabilities.

Adequacy of loss reserves are assessed by the HoAF by an annual actuarial reserve study. This study is internally verified by the Group Chief Reserving Actuary and externally by a third-party actuarial opinion. The appropriateness of estimated loss ratios is assessed on a quarterly basis which includes an actual versus expected analysis by underwriting year and line of business. Any variances deemed to be significant are discussed with executive management with appropriate adjustments being made. The HoAF is required by the CBI to prepare a formal report to the Board and statement of opinion to the CBI.

Catastrophic events are deemed to be events that create a loss to the Group of US$10m or more when combining Group affiliates. These events are tracked on a quarterly basis. Exposure to Natural Catastrophe events is controlled through aggregate management by peril and zone.

The Company believes that it holds an adequate surplus of capital to allow it to pursue its strategic goal of achieving market leading average ROE over the insurance cycle.

Overall volatility of solvency needs, relevant to capital is deemed to be low. ECM capital is relatively close to the SII required capital. As statutory capital stands at nearly €500m the Board believe there is an adequate buffer in place to cover regulatory capital requirements.

B.3.4.a The ORSA assessment process

The ORSA process can be defined as an overarching process made up of the entirety of the policies and procedures employed by business functions to:

- Identify, assess, monitor, manage and report the short- and long-term risks that the Company faces or may face (Risk Assessment)
- Determine the own funds necessary (Capital Requirements) to ensure that the Company's overall solvency needs are continuously met (Solvency Assessment)
- Document the outcome of the Risk Assessment and calculation of Capital Requirements in an ORSA Report.

The ORSA is the Company's own view of its future risk and solvency position. As such it is embedded into the planning and strategic decision-making process. Where large or non-standard deals are being considered, their potential quantitative impact on the Company's solvency capital position will be identified and articulated to the Underwriting Committee who will consider the output in line with the Company's strategic objectives. Any such assessments will be brought to the attention of the Board if the deal is considered to be commercially viable by the Underwriting Committee.

The Company's approach focuses on ensuring that the ORSA process is well integrated into the Company's strategic management and decision-making framework. Therefore, the ORSA process forms part of the model for decision making in which the Company's solvency position is considered at all times. The Board and executive management adopt a risk-based approach to decision making, taking into account risk and associated capital requirements.

The Company ORSA processes are grouped into "Own Risk Assessment" processes which relate to the identification and assessment of risks faced by the Company and "Solvency Assessment" processes which are used for setting the appropriate level of capital based on the Company risk profile. These processes and their outputs are embedded in the day to day "business as usual" processes and therefore not specifically identified as "ORSA processes" or "ORSA reports".

B.3.4.b Frequency of the review and approval of the ORSA by the Company's administrative, management or supervisory body

The Board of Directors reviews and approves the ORSA at least annually, or at such times when a material change in business strategy would necessitate an update to more accurately illustrate the Company's risk environment.

A "dynamic ORSA" process runs throughout the course of the year with reports being made to the Board at their regular meetings.

B.3.4.c Determination of the Company's own solvency needs given the Company's risk profile and how capital management activities and risk management system interact with one another

The Company, as part of the Everest Re Group, has access to, and utilises, the skill and expertise of a centralised Enterprise Risk Management department, headed by the Group CRO. The Company utilises a sub-set of the Group Economic Capital Model (ECM) when calculating current risk positions of its three key risks.

The Company's annual business planning process takes place during the fourth quarter. The process includes the determination of capital requirements, including SCR and internal Economic Capital Requirement (ECR), resulting from the plan in line with the strategic objectives set by management and expected market conditions.

In order to ensure that the evolving nature of the risks identified in the ORSA are adequately monitored on an ongoing basis the Chief Risk Officer maintains an open and regular dialogue with the Group Emerging Risk Committee.

The ORSA processes and outputs used to assist Board in decision making are:

- **Risk Profile**: Assessment of the impact on the portfolio risk appetite and tolerance due to either a change in business mix or premium volumes in the proposed annual business plan.
- **Capital setting**: The SCR and ECM play a central role in calculating the necessary capital and solvency requirements resulting from the plan. The process aims to ensure that the SCR and ECR set for the following year are adequate to cover the Company's solvency needs as set by the Board.
- **Stress and scenario testing**: This is carried out to test the effect of a range of possible outcomes and set a range of acceptable parameters to ensure that the business bound remains within the risk appetite and tolerances set by the Board.

B.4 Internal control system

B.4.a Description of the internal control system

The Company's internal control framework has been designed to cover the following processes.

The Board of Directors, through the operation of the Audit, Risk and Underwriting committees ensures that the internal control framework is maintained to ensure the accuracy and timely reporting of financial and regulatory reporting. In addition to administrative and accounting procedures, the internal control framework covers the governance and oversight of:

- Underwriting,
- Calculation of technical provisions,
- Actuarial pricing and reserving,
- Claims adjustment,
- Compliance,
- Outsourcing, and
- Data protection and Information Technology.

The Company's internal control framework is subject to an annual review. As part of an SEC regulated Group, the Company is also subject to the requirements of Sarbanes Oxley and as such a review by the Company's external auditors on the appropriateness and effectiveness of controls. All internal controls are documented and include at least the following:

- A narrative overview of the processes and procedures,
- Identification of Key Controls,
- A risk assessment of each Key Control; and
- A management testing plan for each Key Control.

B.4.5.b Description of how the compliance function is implemented

The compliance function acts independently from other functions and departments and provides assurance to the Board in respect of the effectiveness of the risk management framework. The Compliance Officer is not involved in any day-to-day operational activities, other than those required to fulfil their duties and to ensure that no conflicts of interest arise. The Compliance Officer has been given authority to access information necessary to ensure that they fulfil their duties in respect of the oversight of the Company's internal control framework.

The Compliance function works closely with the Internal and External Audit functions to ensure that any deficiencies are noted, remediation measures are implemented, and all material issues are brought to the attention of the Audit and Risk Committees.

Supervision of the Company's compliance function is achieved through Board oversight together with the interaction of senior management and the CEO.

Periodic compliance risk assessments of the Company's business activities are undertaken by the Compliance Officer in conjunction with operational management. Compliance monitoring is achieved through scheduled and unscheduled reviews, incident/issue reporting, recording regulatory developments and the logging of complaints.

The Compliance Officer undertakes an annual review of the Company's procedures and practices to determine if they are being carried out in accordance with applicable regulatory requirements and best practices. The result of this review is presented to the Board for review and consideration.

B.5 Internal audit function

The purpose of the internal audit function is to determine whether the Company's risk management, internal control, and governance processes are adequate and functioning in a manner which ensures:

- Risks are appropriately identified and brought to the attention of the Board.
- Verification of the Company's assets.
- The reliability and integrity of the Company's financial and regulatory information.
- Compliance with policies, standards, procedures, and applicable laws and regulations.

In addition, the internal audit function shall, as required, provide management value-added activities outside the traditional criteria of internal auditing services.

The head of internal audit function formulates an annual audit plan which is put before the Audit Committee. The plan evaluates the effectiveness of risk management and control processes across the business and selects risks in order to provide full coverage of key risks on a three year cycle. The Audit Committee and executive management may also request the inclusion of additional areas for review.

B.5.a Description of how the Company's internal audit function is implemented

The Company outsources the Head of Internal Audit PCF function to a third party. The Head of Internal Audit reports to the Chairman of the Audit Committee who is an Independent Non-Executive Director. The internal audit report is reviewed by the Audit Committee and presented to the Board by its Chairman.

The mission of the Internal Audit function is to provide independent, objective assurance and consulting services designed to add value and improve the Company's operations. It helps the Company accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, internal control, and governance processes. The Company is subject to oversight by both Group and local internal functions.

B.5.b Description of how the Company's internal audit function maintains its independence and objectivity from the activities it reviews

By outsourcing the internal audit function to a third party which is not engaged in any executive or operational function that relate to the day-to-day running of the Company, the Board ensures an appropriate separation of duties and independence.

In addition to this, the Internal Audit department of Everest Global Services carries out the Group Internal Audit function as directed by the Audit Committee of Everest Re Group Ltd.

B.6 Actuarial function

B.6. Description of how the actuarial function of the Company is implemented

The Company is required to meet the requirements of the Central Bank of Ireland's Domestic Actuarial Regime in respect of the Actuarial Function. The position of Head of Actuarial Function (HoAF) is held by the CRO and Group Accumulation Lead in the Zurich Branch office. The HoAF is a Fellow of the Casualty Actuarial Society and holds the controlled function PCF 48. The HoAF is supported by a team of qualified and part qualified actuaries with industry specific experience, as well actuarial and enterprise risk resource provided by Group.

The actuarial function is required to:

- Calculate the Technical Provisions and inform the Board on the adequacy of the calculation. In addition, the HoAF is required to provide an opinion and accompanying report to the Central Bank of Ireland.
- Prepare an opinion to the Board on underwriting policy and the adequacy of any reinsurance arrangements.
- Contribute to the effective design and maintenance of the Company's risk management system.
- On an annual basis provide to the Board with a statement on data quality and controls.

The Actuarial Function works separately from other operational departments and reports directly to the Group Chief Actuary and Chief Risk Officer.

As a consequence of the PRISM rating being changed from Medium Low to Low, the Company is no longer required to appoint a Reviewing Actuary to undertake the five-year peer review.

B.7 Outsourcing

Description of the outsourcing policy of the Company, any outsourcing of any critical or important operational functions or activities and the jurisdiction in which the service providers of such functions or activities are located

With the exception of the outsourcing of the Internal Audit Function and payroll, the Company does not have any outsourcing arrangements in place with third parties outside of the Everest Re Group. All outsourcing arrangements are subject to service level agreements.

The Company is required to notify the CBI of any proposal to outsource critical or important functions or activities i.e. those activities which are essential to the operation of the Company as it would be unable to deliver its services to policyholders without them. The Company is required to carry out a detailed examination to ensure that the service provider has the necessary ability to carry out the outsourcing function or activity, taking into account the impact of the proposed outsourcing arrangement on the operations of the Company.

The Company has a comprehensive outsourcing policy in place which has been approved by the Board. The purpose of the Company's outsourcing policy is to:

- Clearly set out the roles and responsibilities within the Company in relation to outsourcing;
- Clearly set out those functions which the Board feel may be outsourced by the Company;
- Clearly set out the principles on which the Company outsources material functions;
- Provide a description of the processes and procedures which the Company carries out prior to outsourcing, including the assessment and impact of the outsourcing on its business;

- Provide a description of the processes and procedures post outsourcing including the review of service levels and the associated reporting and monitoring required by the Company to ensure that the outsourced service meets the same standard expected as if it remained within the Company.

The Company considers the following outsourced functions to be critical or important operational functions or activities:

Activity	Service Provider	Jurisdiction
Claims handling and adjusting	Everest Advisors (UK) Ltd	UK
Information Technology	Everest Advisors (UK) Ltd	UK
	Everest Global Services	USA
Actuarial Pricing and Reserving	Everest Advisors (UK) Ltd	UK
Enterprise Risk Management	Everest Global Services	USA
Internal Audit	Mazars	Ireland
	Everest Global Services	USA
Investment Management	Everest Global Services	USA
	Deutsche Asset Management International	Germany
	Crescent Capital Group	UK
Payroll Services	Grant Thornton	Ireland
	PRS	Switzerland

B.8 Any other material information regarding the system of governance of the Company

The Company carries out a series of internal reviews as to the adequacy of the components of the systems of governance, with any deficiencies reported to the Audit Committee. The Board considers that the system of governance is adequate with regard to the nature, scale, and complexity of the risks inherent in the Company's business.

The Company does not have any other material information to disclose in regard to system of governance.

C. RISK PROFILE

The Company's risk profile directly reflects the business strategy which is to accept Property & Casualty reinsurance underwriting risk. As a consequence, the Company is also exposed to a range of other risks necessary to run the business. These risks are articulated and assessed in a risk register based upon the CBI PRISM regime. The risk register describes the risks to which the Company is exposed, including: asset/market, insurance, mortgage, operational, credit, liquidity, strategic, fungibility, Eurozone, concentration, and environmental risks.

The Board aligns risk appetite and tolerances with its strategic goals. On at least an annual basis the Chief Risk Officer, following consultation with executive management, produces a submission to the Board regarding the effectiveness of current risk mitigating techniques and a proposal for those required in the future. The Board monitors the continued effectiveness through a variety of submissions made by the Chief Risk Officer, Head of Actuarial Function, Head of Finance and Underwriting Committee at the regular Board meetings.

Stress testing and sensitivity analysis for material risks

A number of stress and scenario tests are used to assist the Board in understanding how the Company's risk profile would look under stressed conditions and to determining the associated impact on capital requirements. These tests and their results form part of the ORSA process. The types of testing performed by the Company include the following:

- **Stress and Scenario testing**: These are plausible scenarios performed as stresses to the Company's balance sheet and with the purpose of informing users about resulting changes to profitability and required capital.
- **Reverse Stress Testing:** This technique is used to consider combinations of extreme events that could result in the business model becoming unviable at the point when crystallising risks cause counterparties and other stakeholders to be unwilling to transact with or provide capital to the Company and, where relevant, existing counterparties may seek to terminate their contracts or the market Regulator may require the Company to be put into run-off due to exhaustion of regulatory capital. As the Company relies on provision of capital and rating from Everest Re Group, Ltd, this scenario would most likely take place where Group is unable, or unwilling, to recapitalise the Company.

C.1 Underwriting risk

Risk measure

€000's	2021	2020
Premium and Reserve Risk	145,387	114,654
Catastrophe Risk	53,158	56,146
Lapse Risk	5,882	4,091
Diversification Benefit	-37,377	-35,123
Total Underwriting Risk	**167,050**	**139,769**

Underwriting risk is the risk that the total cost of claims, claims adjustment expenses and premium acquisition expenses will exceed premiums received. It can arise as a result of numerous factors, including premium (pricing) risk, reserving risk, catastrophe risk and lapse risk (the risk of non-renewal of a material part of the portfolio).

Failure to accurately assess underwriting risk and establish adequate premium rates and terms and conditions as a result of market cycle fluctuations, competition, macroeconomic trends, and regulatory/legal issues can result in reduced earnings and capital.

Premium risk

The Company manages its premium risk through approved underwriting guidelines and specific underwriting authority limits, overseen by the Board of Directors.

The Company manages its non-catastrophe underwriting risk through a cycle of planning, underwriting/pricing and monitoring. This cycle incorporates assessing accumulated exposures, establishing underwriting guidelines that take into account exposure risk, prices and coverage, and placing aggregate exposure limits. Planning primarily involves determining how much premium will be written for each line of business segment and forecasting loss and expense ratios. Underwriting/pricing is carried out by underwriters using approved guidelines that place limits on the amount of business that can be written based on a variety of factors, including ceding company profile, line of business, geographic location, and risk hazards.

Management regularly reviews these guidelines in response to changes in market conditions, risk versus reward analysis and the Company's underwriting risk management processes. Monitoring involves tracking premium, reported and incurred but not reported (IBNR) losses and acquisition expenses.

The Company is exposed to pricing risk to the extent that unearned premiums are insufficient to meet the related future policy costs. Evaluation is performed regularly to estimate future claims costs, related expenses, investment income and expected profit in relation to unearned premiums. Premium deficiencies, if any, are netted against deferred acquisition costs.

Reserve risk

Reserve risk arises when actual claims experience differs adversely from the assumptions included in setting reserves, in large part due to the length of time between the occurrences of a loss, the reporting of the loss and the ultimate resolution of the claim. Provisions may ultimately develop differently from the actuarial assumptions made when initially estimating the provision for claims. To the extent reserves prove to be insufficient to cover actual losses and adjustment expenses, the Company would have to recognise such reserve shortfalls and incur a charge to earnings, which could be material in the period such recognition takes place.

The Company reserves on a best estimate basis in accordance with the requirements of Solvency II. An annual reserve study of loss development is carried out by the Chief European Actuary. The Company takes all reasonable steps to ensure that it has appropriate information regarding its claims exposures, including carrying out claims audits to ensure the insured is complying with all procedures as documented in reinsurance contracts and validating claims made to the Company by the reinsured.

The Company's loss reserving methodologies continuously monitor the emergence of loss and loss development trends, seeking, on a timely basis, to both adjust reserves for the impact of trends shifts and to factor the impact of such shifts into the Company's underwriting and pricing on a prospective basis.

Natural Catastrophic ("Cat") risk

The Company is exposed to unpredictable Cat events arising from man-made or natural catastrophes that could significantly impact the operating results and financial condition of the Company. The Company manages its catastrophe-exposed risks through a cycle of planning, pricing, accumulation, and post-event monitoring.

Planning primarily involves determining how much capacity the Company can absorb using return on equity targets. Accumulations of cat exposures are performed using Everest's proprietary catastrophe pricing and accumulation model.

In order to mitigate the effects of Cat events, the Company has in place a Catastrophe Excess of Loss agreement with a Group affiliated company to limit exposure to Cat losses. The Company remains liable to its policyholders with respect to ceded reinsurance if any reinsurer fails to meet the obligations it assumes.

Risk concentration

The Company writes non-life reinsurance property, casualty, catastrophe, financial and marine lines of business in Continental Europe. Accumulations of risk across different lines of business are monitored regularly.

Accumulation analysis helps to ensure that the Company is not exposed to more risk in any particular area or line of business than that set by risk appetite. The Company's accumulation strategy aims to:

- Contain underwriting loss across the Company to a manageable financial level, in line with risk appetite, which minimizes the financial impact to the balance sheet.
- Manage the accumulated underwriting risk across all lines of business so that the Company's market share of a loss is not out of line with acceptable expectations.
- Manage the Company's market share of a loss to less than the market share of the premium to that loss, i.e., profitable diversification of the book.
- Continuously enhance the Company's ability to identify, mitigate and avoid shock losses.

Risk mitigation

The Company purchases a whole account quota share and an excess of loss catastrophe protection in addition to other reinsurance to limit underwriting risk exposure and reduce volatility in underwriting results.

Risk sensitivity

The principal assumption underlying the claims liabilities estimates is that the Company's future claims development will follow similar pattern to past claims development experience. These estimates are based on various quantitative and qualitative factors including:

- average claim costs including claim handling costs;
- trends in claims severity and frequency; and
- other factors such as inflation, expected or in-force government pricing and coverage reforms, and the level of insurance fraud.

Most or all of the qualitative factors are not directly quantifiable, particularly on a prospective basis, and the effects of these and unforeseen factors could negatively impact the Company's ability to accurately assess the risk of the insurance contracts that the Company underwrites. In addition, there may be significant reporting lags between the occurrence of the insured event and the time it is actually reported to the Company and additional lags between the time of reporting and final settlement of claims.

The Company refines its claims liabilities estimates on an ongoing basis as claims are reported and settled. Establishing an appropriate level of claims liabilities is an inherently uncertain process and the policies surrounding this are overseen by the Actuarial function.

C.2 Market risk

Risk measure

€'000	2021	2020
Interest Rate Risk	26,958	10,033
Equity Risk	29,959	16,888
Spread Risk	44,756	25,408
Currency Risk	71,823	114,346
Property Risk	384	403
Concentration Risk	6,298	10,503
Diversification Benefit	-59,611	-43,805
Total Market risk	**120,567**	**133,775**

Market risk is the risk that the fair value of future cash flows of a financial instrument will fluctuate because of changes in market prices. The Company manages its market risk through a cycle of interactions between the Board of Directors, the Group Chief Investment Officer and investment managers. The Group Chief Investment Officer monitors the performance of the Company's financial instruments and approved investment policies. When appropriate, recommendations are made to the investment managers to ensure compliance with local regulatory requirements and Company capital needs.

Assets are invested in line with Board approved investment guidelines and in accordance with the 'prudent person principle'. The Board periodically reviews and monitors the security, quality, liquidity and profitability of the portfolio as a whole to ensure that it aligns with the Company's strategic goals and risk appetite.

A significant majority of the Company's assets are held in cash and fixed income securities with about 70% rated A or higher. The Board periodically adjusts investment mix consistent with current and projected market conditions and the Company's risk appetite. The Board's periodic review ensures that fixed income securities are not concentrated with any individual issuer.

Interest rate risk

Movements in interest rates affect the level and timing of cash flows for the Company and the fair value of the fixed income securities. As interest rates rise, the fair value of fixed income portfolio declines and, conversely, as interest rates decline, the fair value of fixed income portfolio rises. To minimize this risk, the investment manager follows investment policy guidelines in line with Company specific guidelines and objectives. The Company invests principally in fixed interest rate bonds.

Equity risk

Equity risk arises from the level or volatility of market prices for equities. Exposure to equity risk arises in respect of all assets and liabilities whose value is sensitive to changes in equity prices. The Company generally does not invest in the equity markets and but does have some Type 2 equity exposure in the portfolio from various collective investment undertakings.

Spread risk

The Company is exposed to price risk arising from fluctuations in the value of financial instruments as a result of changes in the market prices and the risks inherent in all investments. The risk is managed by the Company by maintaining an appropriate mix of investment instruments.

Property risk

Property Risk arises from the volatility of real estate investments made by the Company. Similar to equity markets, the Company does not invest heavily in real estate and is not exposed to any great degree in Property Risk.

Currency risk

Foreign currency risk in the risk that the fair value or cash flows of a financial instrument will fluctuate because of changes in exchange rates and produce an adverse effect on net income and capital when measured in the Company's functional currency. The Company's cash flow and earnings are subject to fluctuations due to exchange rate variation. Foreign currency risk exists by nature of the Company's global reinsurance programme and its investment strategy where it invests in both Euro and non-Euro assets and cash. The Company's principal transactions are carried out in Euro though it has exposure to foreign exchange risk principally with respect to British Sterling and US Dollars. The Company's financial assets are denominated in Euro, Sterling and US Dollars currencies which mitigate the foreign currency exchange rate risk. For each currency in which the Company has established substantial loss and LAE reserves, the Company seeks to maintain invested assets denominated in such currency in an amount approximately equal to the estimated liabilities in order to mitigate foreign currency exposure.

Concentration risk

The Company continues to maintain an investment portfolio that is well diversified both geographically and by sector. The Company's investment mix is similar to that of a typical EU undertaking, consisting of significantly more bonds than equities. This strategy will carry forward, while limiting any concentration risks in the investment space.

Risk mitigation

While no specific risk mitigation technique is employed to decrease the Company's solvency capital requirement in regard to Market Risk, the risk itself is managed thoroughly as described above per sub-risk.

Risk sensitivity

A material portion of Market Risk for the Company is the Currency Risk. This risk is justifiably significant as the Company holds much of its surplus in USD. Sensitivity and stress analyses are performed by the CIO on a quarterly basis and reported to the Board. Based on economic scenario generator output in regard to foreign exchange rates, distributions are created and analysed at various return periods. As of the date of this report, the Company remains well within its Board-approved risk appetite at a 1 in 200 return period for this risk.

C.3 Credit risk

Risk measure

€'000	**2021**	**2020**
Counterparty Risk	30,389	20,392

Credit risk is the risk of loss or of adverse change in the financial situation, resulting from fluctuations in the credit standing of issuers of securities, of counterparties and any debtors to which the Company is exposed. The Company's credit risk exposure is concentrated primarily in its debt securities, fixed income bonds, reinsurance assets and reinsurance premium receivable.

Risk concentration

The major concentration within Credit Risk lies in the Company's reinsurance arrangements with affiliated companies. Because of the Group's robust balance sheet and rating strength, the Company does not view this concentration as a significant exposure.

Risk mitigation

The Company manages investment portfolio credit risks by ensuring adherence to its investment policy, which is regularly reviewed by the Board of Directors and through the use of approved investment guidelines that restrict quality and diversification of bond holdings that mitigate risk. The Company's policies limit and monitor its exposure to individual issuers and classes of issuers of investment securities by currency, duration, asset class and credit rating. The requirements of the Company's investment policy were met at all times during the year.

Reinsurance assets are reinsurers' share of outstanding claims, UPR and IBNR. As the Company mainly engages in internal reinsurance with affiliates, and the credit risk of its major reinsurers are highly rated, the Company does not regard the recoverability of reinsurance assets as a material credit risk.

The Company holds cash deposits with Barclays Bank Ireland plc, (A rated), Deutsche Bank (A), Bank of New York Mellon (AA) and HSBC France (AA).

Risk sensitivity

As the Company relies on provision of capital and rating from Everest Re Group, Ltd, reverse stress testing is performed as affiliated companies constitute a concentration within Credit Risk. This scenario would most likely take place where Group is unable, or unwilling, to recapitalise the Company. According to the ECM, the likelihood of this is quite remote.

C.4 Liquidity risk

Risk measure

€'000		2021	2020
	EPIFP	117,898	69,763

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 Company has to meet its liabilities as and when they fall due, notably from claims arising from its general reinsurance contracts. There is therefore a risk that the cash and cash equivalents held will not be sufficient to meet its liabilities when they become due. Given the credit quality of the Company's financial assets as per the tables above, and with 42% of the bond portfolio having a maturity of 5 years or less, the Company is able to quickly liquidate its investments at an amount close to their fair value to meet its liquidity requirements or to respond to specific events such as deterioration in the creditworthiness of any particular issuer. In addition, the Company holds cash to assist in meeting its liquidity requirements, if necessary. The portfolio is externally managed by an independent, professional investment manager using portfolio guidelines approved by the Company.

Risk concentration

The Company strives to maintain a balanced, diversified, non-correlating book of business along with a well-diversified investment portfolio. The Company ensures liquid surplus is available at hand. In this way, the Company does not have a significant concentration of liquidity risk.

Risk mitigation

The Company seeks to ensure that it collects sufficient premium income to meet the cost of potential claims and expense outflows over time and maintains its short-term cash commitments as readily available bank deposits with highly rated financial institutions.

Risk sensitivity

The Company performs stress scenario testing to ensure it retains sufficient Own Funds to meet both internal and external capital requirements. These tests consider the adverse impact of events across a range of measures including catastrophe loss, interest rate movement, loss reserve development and equity devaluation. In the case of simultaneous events, the Company remains within its Board-approved risk appetite.

Expected profit included in future premiums

The total gross amount of expected profit included in future premiums, calculated pursuant to Article 260(2) of Delegated Regulation (EU) 2015/35, amounts to €117.898m.

C.5 Operational risk

€'000	2021	2020
Operational Risk	22,121	12,518

Operational risk is the risk of loss arising from inadequate or failed internal processes, personnel, systems or other external events. The Company has identified and mitigated against a number of operational risks including fraud, business interruption, failure of outsourcing providers, internal control failure and loss of key personnel. A wide range of checks and controls further help mitigate Operational Risk. This section is divided into four parts:

(i) Information Technology (IT)

The Company has in place a Board approved IT Policy as well as adopting the standards and policies of Group. The Company has set technical, physical, logical and procedural security defences that include:

- Perimeter and internal defences such as firewall products; anti-virus, anti-spam, and anti-spyware software; as well as encryption technology for laptops, backup tapes & data transmissions over the Internet.
- Physical security of hardware assets, locked facilities, and data centre environmental controls.
- Logical security over hardware, software, data and remote access, restricting access to only the appropriate people and enforcing strict password rules, including two-factor authentication.
- Procedural defences such as documented security policies, automatic system "time-outs", and regular monitoring of areas at risk.
- An extensive Business Contingency Plan (BCP) has been developed with Group which is updated annually. In addition to internal security reviews, a Group Network Vulnerability Assessment is conducted annually by an external third party. The Company tests BCP on an annual basis.
- To mitigate the possibility of damage and loss to Everest Systems from a cyber-attack, employees are required to undergo annual cyber awareness training.

(ii) Legal

Ethical behaviour by all employees is the key to reducing a number of risks, in particular, Reputation Risk and Legal / Litigation Risk. Every employee is expected to always adhere to the highest ethical standards. Local legal expertise can be accessed by ERCID as required. In addition to this, Group provides legal support in business risk (including reputational risk), regulatory, transactional and litigation contexts. All legal matters are brought to the attention of either the Group's General Counsel or the Associate General Counsel at Everest Advisors in London and managed in coordination with senior management.

All materially significant legal matters are brought before the Board.

(iii) Internal Audit

Internal Audit (IA) which assists management by providing objective assurance that the major operational risks are being managed appropriately and by providing assurance that the risk management and internal control framework is operating effectively.

The mission of the Internal Audit function is to provide independent, objective assurance and consulting services designed to add value and improve the Company's operations. It helps the Company accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, internal control, and governance processes. The Company is subject to oversight by both Group and local internal functions.

The Internal Audit function is co-sourced by Group Internal Audit and a local Irish firm of chartered accountants who holds the Pre-Approval Controlled title of Head of Internal Audit.

(iv) Compensation and key role succession planning

The Company compensates relevant employees with a mixture of salary, bonus and stock-based awards commensurate with their level of seniority, job responsibility, individual performance and contribution to the performance of the Company.

The Company has a policy in place concerning succession planning.

C.6 Other material risks

The Risk Committee of the Board discusses emerging risks during the regular assessments of the Risk Register. In addition, risk identification, analysis, evaluation and monitoring of emerging risks are carried out by the Group Emerging Risk Committee. The Committee will identify new and developing risks that could lead to material adverse consequences for the Group, and then will translate those insights into actionable strategic recommendations for consideration by the ERCID Risk Committee and Board. Any recommendations, which will include the perceived size of the impact and likelihood of such emerging risks affecting the Everest Group and the Company; thereby ensuring key individuals are kept up to date on current developments. Following the risk analysis at Group level the outputs are considered by the Company and the Risk Register updated where applicable.

C.7 Any other information

The Company does not have any other material information to disclose in regard to risk.

D. VALUATION FOR SOLVENCY PURPOSES

The Company values assets and liabilities, other than technical provisions, according to the risk-based approach prescribed under Solvency II valuation rules and Irish GAAP.

Valuations are at fair value, being the amount which an asset could be exchanged between knowledgeable willing parties in an arm's length transaction, using market consistent valuation methods. Assets and liabilities are recorded in the Solvency II Market Consistent Balance Sheet ('MCBS') according to the value of expected future cash flows.

The following summarized balance sheet as at 31 December 2021 analyses the differences in valuation between the Company's annual financial statements produced under Irish GAAP and the MCBS.

		Statutory accounts value	Adjustment	Solvency II value
Assets		**€'000**	**€'000**	**€'000**
Deferred acquisition costs	R0020	14,708	-14,708	-
Deferred tax assets	R0040	2,411	-2,411	-
Property, plant & equipment held for own use	R0060	1,534	-	1,534
Government Bonds	R0140	163,513	922	164,435
Corporate Bonds	R0150	436,899	3,473	440,372
Collective Investments Undertakings	R0180	53,214	399	53,613
Reinsurance recoverable	R0270	696,720	-210,551	486,169
Deposits to cedants	R0350	16,745	-	16,745
Insurance and intermediaries receivables	R0360	254,649	-230,730	23,919
Reinsurance receivables	R0370	-	351	351
Receivables (trade, not insurance)	R0380	27,186	21	27,207
Cash and cash equivalents	R0410	67,104	-399	66,705
Any other assets, not elsewhere shown	R0420	6,287	-4,799	1,488
Total assets	R0500	1,740,970	-458,453	1,282,538
Liabilities				
Best Estimate	R0540	760,764	-25,162	735,602
Risk Margin	R0550	-	50,061	50,061
Best Estimate	R0580	-	1,771	1,771
Risk Margin	R0590	-	195	195
Other technical provisions	R0730	224,577	-224,577	-
Deposits from reinsurers	R0770	11,560	-	11,560
Deferred tax liabilities	R0780	-	-	-
Insurance & intermediaries payables	R0820	26,295	-10,455	15,840
Reinsurance payables	R0830	215,846	-151,587	64,259
Payables (trade, not insurance)	R0840	3,383	-1,320	2,063
Any other liabilities, not elsewhere shown	R0880	1,519	948	2,467
Total liabilities	R0900	1,243,944	-360,126	883,818
Excess of assets over liabilities	**R1000**	**497,026**	**-98,306**	**398,720**

D.1 Assets

D.1.a Solvency II valuation for each material class of asset expressed in €'000:

Deferred acquisition costs

Deferred acquisition costs are costs relating to contracts in force at the balance sheet date arising from the unexpired period of risk at the reporting date, but which relate to a subsequent reporting period and are carried forward to subsequent reporting periods. Deferred acquisition costs are valued at nil for Solvency II purposes as it does not have a future cash flow.

Investments - Government bonds, corporate bonds and collective investment undertakings

€'000	2021	2020
Valuation for solvency purposes	658,419	645,301

For fair valuation purposes investments may be classified into three levels of fair value hierarchy based on the characteristics of inputs available in the marketplace.

- Level 1 – Quoted prices for an identical asset in an active market. Quoted in an active market in this context means quoted prices are readily and regularly available and those prices represent actual and regularly occurring market transactions on an arm's length basis.
- Level 2 – When quoted prices are unavailable, the price of a recent transaction for an identical asset provides evidence of fair value as long as there has not been a significant change in economic circumstances or a significant lapse of time since the transaction took place. If it can be demonstrated that the last transaction price is not a good estimate of fair value (e.g. because it reflects the amount that an entity would receive or pay in a forced transaction, involuntary liquidation or distress sale), that price is adjusted.
- Level 3 – If the market for the asset is not active and recent transactions of an identical asset on their own are not a good estimate of fair value, the fair value is estimated by using a valuation technique. The objective of using a valuation technique is to estimate what the transaction price would have been on the measurement.

The Company chooses to invest a significant majority of its assets in low volatility, highly rated government or corporate bonds. No equities are held in the portfolio. Government bonds are those issued by central and regional governments and supra-national institutions. Corporate bonds are those issued by corporations, including contingent convertible securities. Both Government and Corporate bond investments are valued at level 2.

As at 31 December 2021 the Company held investments in an Undertaking for Collective Investments in Transferable Securities (UCITS) Money Market Fund (the "UCITS") and an Alternative Investment Fund (the "AIF"). The classification of the Collective Investment Schemes (CIS) within the Fair Value Hierarchy is based on the nature of the underlying investments held by the CIS and the redemption terms available to the Company.

The UCITS consists of a French Government 'C' bonds held as collateral by a third-party custodian at the request of several ceding companies. These are contractually required to cover outstanding reserves under the terms of a collateral agreement between the Company and the cedant companies. These investments are valued under hierarchy Level 1.

The AIF is classified as Level 3 as the underlying investment portfolio is valued by the AIF Manager using unobservable inputs. In addition, the AIF is a close-ended fund which provides for limited redemption rights by the Company throughout the expected life of the AIF during the period to 10 December 2024.

Further details relating to these investments are given in section A.3.a.

Accrued investment income disclosed under Irish GAAP as 'Any other assets, not elsewhere shown' has been reclassified to Government and Corporate bonds in the MCBS.

Reinsurance recoverable

Valuation for solvency purposes	**€486,169**

Reinsurance recoverable balances represent recoveries due to the Company under outwards reinsurance agreements. A recalculation of the value is required under Solvency II as part of the calculation of technical provisions.

Deposits to cedants

Valuation for solvency purposes	**€16,745**

This balance represents cash funds held by cedants as security against future claim payments. Such balances are considered to be held at fair value under Solvency II.

Insurance and intermediaries receivables

Valuation for solvency purposes	**€23,919**
Valuation in financial statements	**€254,649**

These represent debtor balances which are greater than 90 days past due. Balances which are less than 90 days past due are deemed to be future cash flows and reclassified as part of technical provisions. Under Solvency II amounts receivable in respect of premium accruals are excluded and subsequently included as part of technical provisions calculation.

Receivables (trade, not insurance)

Valuation for solvency purposes	**€27,207**

Included in Receivables (trade, not insurance) is a subrogation amount of €27.1m which is recoverable against a loss arising on a financial reinsurance contract. The loss arose from the default of an aviation finance loan following the bankruptcy of Norwegian Airlines, with the subrogation expected from the sale of the aircraft provided as collateral against the defaulted loan. Such balances are considered to be held at fair value under Solvency II.

Cash and other cash equivalents

Valuation for solvency purposes	**€66,705**

Cash and cash equivalents are monies held as cash on hand, cash and short-term deposits held on call with banks. Such balances are considered to be held at fair value under Solvency II.

Any other assets, not elsewhere shown

Under Irish GAAP accrued investment income is included under the category 'Any other assets, not elsewhere shown'. This has been reclassified to Government and Corporate bonds in the MCBS.

Valuation for solvency purposes	**€1,488**

D.1.b There are no material differences between the bases, methods and main assumptions used by the Company for the valuation for solvency purposes and those used for its valuation in financial statements.

D.2 Technical provisions

D.2.abc

The Head of Actuarial Function is responsible for the oversight of the calculation of technical provisions. As at 31 December 2021 the gross technical provisions are €787.6m. The technical provisions net of reinsurance as at 31 December 2021 are €301.5m. The table below lists the Company's technical provisions by line of business.

Gross Technical Provisions - 31 December 2021 € 000's	**Gross Technical Provisions**	**Gross Best Estimate**	**Risk Margin**
Direct business and accepted proportional reinsurance			
Income protection insurance	1,143	1,046	98
Motor vehicle liability insurance	19,452	18,445	1,007
Marine, aviation and transport insurance	79,371	74,294	5,077
Fire and other damage to property insurance	86,317	80,574	5,743
General liability insurance	69,639	65,849	3,790
Credit and suretyship insurance	47,464	44,515	2,949
	303,386	284,723	18,664
Accepted non-proportional reinsurance			
Non-proportional health reinsurance	823	726	98
Non-proportional casualty reinsurance	88,166	80,524	7,642
Non-proportional marine, aviation and transport reinsurance	35,000	32,261	2,739
Non-proportional property reinsurance	360,255	339,141	21,114
	484,243	452,651	31,593
Total	**787,630**	**737,374**	**50,256**

The Company's reserving process uses generally accepted actuarial methods to estimate the amount of technical provisions required as part of an annual reserves review exercise. The process includes a detailed review by actuarial, underwriting and claims staff of each line of business and of development patterns and loss ratios.

Due to the inherent uncertainty and differences between lines of business and claims payment patterns there is an acceptable range of uncertainty included in the calculation of technical provisions. This can vary year on year depending on various factors including the nature of the underlying business and its volatility, the current economic climate, the frequency and severity of claims reported during the year, historical patterns and managements view on any of these factors.

- Best Estimate uncertainty due to future claims experience is caused by a number of external factors (i.e. legal, economic and social) which are considered during the Company's reserving process. The Company's provisions for its 3-pillared approach in Property, Casualty, and Specialty Lines can be impacted by, for example, catastrophe model uncertainty, litigation reform and political environment, respectively.

- WBNI (written but not incepted) uncertainty exists in the estimate of premium per the Company's definition of contract boundaries. As the major renewal date for the Company is January 1 of each year, this assumption's sensitivity is not significant, but can have a slight impact.
- As Solvency II requires payment of future claims and receipt of future premiums is discounted to present value, assumptions on payment and earning patterns can cause uncertainty. Patterns are developed based on historical information and assumed to be consistent with future cash flows.
- Expense estimate uncertainty exists as historically incurred expenses are used to predict future expenses on a SII basis. Using past experience and expert judgment, operating expenses are allocated accordingly.

There is no allowance provided for any unexpired risk. Adjustments are made where the modelled calculation is thought to give unreasonable answers. These can arise where:

- The default calculated pattern for a given line of business is inadequate, distorting the expected amount, or
- Material premium or claim data is reported after the event, the omission of which may distort the actual amount.

Data and grouping of risks

Technical information relating to each treaty written, including the class grouping to which they are allocated, and underwriting year written is held within the Company's underwriting and accounting systems. Reserving data is grouped by underwriting year. Claims and premiums relating to contracts written in a calendar year i.e. policies where cover commenced in that calendar year, are grouped together, irrespective of when they reported or paid, or received or due for premiums, and irrespective of the year in which the loss occurred or the period of exposure which the premium covered.

Within each year, written premium, paid claims and reported claims information is recorded on a quarterly basis. The projection methods used by the Company make the implicit assumption that future inflation is equal to the weighted average of past inflation. This simplification is deemed to be the most robust and appropriate approach to be applied to reinsurance data, which is often less detailed and more volatile than direct insurance data.

Claims data is converted into the Company's functional currency (Euro) at the exchange rate effective at the end of the reporting period. It is then grouped by reserving product and underwriting year. This enables the Company to utilise larger volumes of data for analysis.

Wherever possible the same groupings are used for calculations required for statutory reporting and Solvency II purposed. This allows for close reconciliation of both the underlying inputs and data outputs. Catastrophe losses are monitored separately by event, with quarterly updates in the loss ultimate presented to management.

Best estimate calculation

The best estimate is a discounted probability-weighted average of future cash flows.

This estimate is based on ultimate amounts that reflect an actuarial analysis of experience to date and projections of future development using patterns and assumptions derived from internal data and/or industry information.

The claims ultimate is typically selected after considering indications from several established actuarial methods:

- Paid and reported chain ladder (CL)
- Initial expected ultimate loss ratio (IEULR)
- Reported Bornhuetter-Ferguson (BF)

The best estimate calculation is based on assumptions, models and methods that have no known bias to underestimation or overestimation (since defined as expected value) and that are internally consistent. Assumptions may be either implicit or explicit and involve interpreting past data or projecting future trends.

The ultimate is determined based on facts and circumstances known to, or reasonably foreseeable, by the Head of Actuarial Function and management at the time of the estimation.

The discount of future cash-flows is performed using the risk-free interest rate term structure provided by EIOPA.

Risk margin
The approach to calculate the risk margin is the simplification Method 2 disclosed in the hierarchy of methods presented by EIOPA.

Simplifications
The risk margin is allocated by line of business using the best estimate technical provisions, as they are deemed to be an adequate reflection of the contribution of each line of business to the overall Solvency Capital Requirement.

Governance
The HoAF is required by the Central Bank of Ireland, the Company's regulatory authority, to provide them with an annual Actuarial Opinion on Technical Provisions ('AOTPs'). This provides an opinion on the compliance of the technical provisions, as reported in the annual QRT's with all relevant Solvency II requirements. In addition, the HoAF is required to provide an Actuarial Report on Technical Provisions (ARTPs') to the Board on an annual basis.

Details of these requirements are provided by the Central Bank of Ireland document *Domestic Actuarial Regime and Related Governance Requirements under Solvency II*.

Identification of deficiencies and recommendations on areas of improvement
The reserving framework is set by the Group Chief Reserving Actuary and the Head of Actuarial Function deems it to be robust and well documented. The integrity of the data used is verified by a documented control system is regularly tested by the Compliance and Internal Audit functions. The methods used, and assumptions made, in calculating the technical provisions are deemed by the Board to be reasonable and appropriate to the nature scale and complexity of the Company. Any deficiencies identified will be addressed by the audit committee and Board.

D.2.d The matching adjustment referred to in Article 77b of Directive 2009/138/EC is not applied

D.2.e The volatility adjustment referred to in Article 77d of Directive 2009/138/EC is not used.

D.2.f The transitional risk-free interest rate-term structure referred to in Article 308c of Directive 2009/138/EC is not applied.

D.2.g The transitional deduction referred to in Article 308d of Directive 2009/138/EC is not applied.

D.2.h.i Recoverables from Reinsurance Contracts and Special Purpose Vehicles

The Company purchases both quota share and excess of loss reinsurance from Group affiliated entities and from external entities. The recoverable amounts from these contracts are calculated separately from the gross best estimate in accordance with Article 81 of Directive 2009/138/EC. The Company has no recoverable from Special Purpose Vehicles.

D.2.h.ii There have been no material changes in the relevant assumptions made in the calculation of technical provisions compared to the previous reporting period.

D.3 Other liabilities

The Company values other liabilities according to the risk-based approach of the Solvency II Directive. Valuations are at fair value being the amount which an asset could be exchanged between knowledgeable, willing parties using market consistent valuation methods.

D.3.a Solvency II valuation for each material class of other liabilities expressed in €'000:

Deposits from reinsurers

Valuation for solvency purposes	**€11,560**

These balances represent funds held due to reinsurers and are held at fair value.

Insurance and intermediaries payables

Valuation for solvency purposes	**€15,840**

These balances represent claims payable to cedants not yet paid. These represent creditor balances which are greater than 90 days past due.

Reinsurance payables

Valuation for solvency purposes	**€64,259**

Reinsurance payable balances represent balances due to companies in respect of outwards quota share reinsurance arrangements. Creditor balances which are aged 0 – 90 days are deemed to be future cash flows and reclassified as part of technical provisions.

Payables (trade not insurance)

Valuation for solvency purposes	**€2,063**

These balances represent non-insurance related payables: investment and custody fees, trade and accounts payables to service providers and suppliers.

Any other liabilities, not elsewhere shown

Valuation for solvency purposes	**€2,466**

These balances represent inter-group payables and taxes due.

D.3.b Material differences between the valuation of other liabilities for solvency purposes and those used for valuation in financial statements

Insurance and intermediaries payables

Valuation for solvency purposes	**€15,840**
Valuation in financial statements	**€26,295**

Creditor balances which are aged 0 – 90 days are deemed to be future cash flows and reclassified as part of technical provisions. In the annual financial statements the Company has included contingent commissions payable to cedants in this category. Under Solvency II contingent commissions payable are included as part of technical provisions calculation. The balance has therefore been excluded and subsequently included as part of technical provisions calculation.

Reinsurance payables

Valuation for solvency purposes	**€64,259**
Valuation in financial statements	**€215,846**

Reinsurance payable balances represent balances due to companies in respect of outwards quota share reinsurance arrangements. Creditor balances which are aged 0 – 90 days are deemed to be future cash flows and reclassified as part of technical provisions. Under Solvency II amounts payable in respect of ceded premium accruals are excluded and subsequently included as part of technical provisions calculation.

D.4 Alternative methods of valuation

The Company does not use any alternative methods for valuation.

D.5 Any other information

The Company does not have any other material information to disclose in regard to valuation for solvency purposes.

E. CAPITAL MANAGEMENT

E.1 Own funds

Basic Own Funds is the excess of assets over liabilities as determined by the Solvency II MCBS.

The Company maintains own funds at a level which provides it with the opportunity to take advantage of profitable growth opportunities whilst maintaining an adequate level of cover of both SCR and MCR. It is the intention of the company to hold Tier 1 Capital as Own funds and to maintain a low risk, well diversified, liquid portfolio of assets.

Throughout the period the Company has eligible own funds available to meet the SCR and MCR comprising of Capital contribution and retained earnings adjusted by the reconciliation reserve described in section E.1e & E.1.f below. The own funds ratio to SCR and MCR at the reporting period end are 149% and 597%, respectively.

E1.a Objectives, policies and processes employed by the Company for managing own funds

Ultimate responsibility for maintenance of own funds lies with the Board of Directors. The Company aims to maintain sufficient own funds to cover SCR and MCR at all times. The CRO and Head of Finance periodically report to the Board on the level of eligible own funds and the ratio of cover over the SCR and MCR. Capital adequacy is also monitored at Group level in order that, if required, the Company is able to source financial resources sufficient to cover the capital requirements of Solvency II Standard Formula, the ORSA, and major rating agencies.

The Company uses a both one- and three-year time horizons for business planning and carries out an annual assessment of reserve adequacy.

There have been no material changes over the reporting period.

E.1.b Own funds classification

At the end of the current and previous reporting periods the entire balance of own funds is available as Tier 1 unrestricted own funds.

As at 31 December 2021 the Company's excess of assets over liabilities is comprised of issued share capital of €2, basic own funds of €291m plus a reconciliation reserve of €108m.

	2021	**2020**
	€'000	**€'000**
Capital contribution	290,736	290,873
Reconciliation Reserve	107,984	97,630
Total basic own funds after deductions	**398,720**	**388,503**

There were no significant changes in own funds by tier over the reporting period.

E.1.c Eligible amount of own funds to cover the Solvency Capital Requirement, classified by tiers

The Company's Own Funds cover 100% of the Solvency Capital Requirement.
Own Funds are represented by 100% Tier 1 unrestricted capital.

E.1.d Eligible amount of own funds to cover the Minimum Capital Requirement, classified by tiers

The Company's Own Funds cover 100% of the Minimum Capital Requirement.
Own Funds are represented by 100% Tier 1 unrestricted capital.

E.1.e Explanation of material differences between equity as shown in the Company's financial statements and the excess of assets over liabilities as calculated for solvency purposes

	2021 €'000	2020 €'000
Capital Contribution	290,736	290,736
Retained Earnings	206,290	198,174
Equity per financial statements	497,026	488,910
Technical Provisions Adjustment	183,003	59,004
Premium Receivables	-68,336	-49,826
Reinsurance Recoverable	-210,552	-106,526
Deferred Tax	-2,421	-3,058
Solvency II Own Funds	**398,720**	**388,503**

E.1.f Key elements of the reconciliation reserve

The reconciliation reserve is calculated as follows

	2021 €'000	2020 €'000
Retained Earnings	206,290	198,037
Technical Provisions Adjustment	183,003	59,004
Premium Receivables	-68,336	-49,827
Reinsurance Recoverable	-210,552	-106,526
Deferred Tax	-2,421	-3,058
Solvency II Own Funds	**107,984**	**97,630**

E.1.g Ancillary own funds

The Company does not hold ancillary own funds.

E.1.h Items deducted from own funds

No items were deducted from own funds.

E.2 Information regarding the Solvency Capital Requirement and Minimum Capital Requirement

The SCR covers at least the major risks, insurance, market, credit, and operational risk, and will take full account of any risk mitigation techniques that can be demonstrated and would be applied in times of stress.

MCR is designed to be the lower solvency calculation, corresponding to a solvency level, below which policyholders and beneficiaries would be exposed to an unacceptable level of risk, if the insurer were allowed to continue its operations.

E.2.a The amounts of the Company's Solvency Capital Requirement and the Minimum capital Requirement at the end of the reporting period

The Solvency Capital Requirement as at 31 December 2021 was €267.1m

The Minimum Capital Requirement as at 31 December 2021 was €66.8m

E.2.b The amount of the Company's Solvency Capital Requirement split by standard formula risk modules

	2021 €000's	2020 €000's
Underwriting Risk		
Premium and Reserve Risk	145,387	114,654
Catastrophe Risk	53,158	56,146
Lapse Risk	5,882	4,091
Diversification Benefit	-37,377	-35,123
	167,050	**139,769**
Counterparty Risk	**30,389**	**20,392**
Market Risk		
Interest Rate Risk	26,958	10,033
Equity Risk	29,959	16,888
Spread Risk	44,756	25,408
Currency Risk	71,823	114,346
Property Risk	384	403
Concentration Risk	6,298	10,503
Diversification Benefit	-59,611	-43,805
	120,567	**133,775**
Diversification Benefit	**-73,048**	**-67,492**
Basic SCR	**244,957**	**226,443**
Operational Risk	**22,121**	**12,518**
SCR	**267,079**	**238,961**

In comparing the year-end 2021 SCR to that at year-end 2020, we can see increases in all risks save Market Risk, which decreased. Premium growth continued to strengthen during 2021. This causes increases in premium, reserve and catastrophe risk charges as additional business is added to the portfolio. Market Risk has decreased mainly due to shifts in the portfolio of invested assets into the Company's reporting currency. The reserve risk has also been impacted by several severe European natural catastrophes in 2021.

E.2.c Information on whether and for which risk modules and sub-modules of the standard formula that the Company is using simplified calculations

The Company calculates the SCR and MCR using the Standard Formula model. The simplified calculation of the sum insured for natural catastrophe risks per Article 90b is used.

E.2.d Information on whether and for which parameters of the standard formula that the Company is using specific parameters

The Company calculates the SCR and MCR using the Standard Formula model without using specific parameters.

E.2.e This section is not applicable

E.2.f The Company does not make use of undertaking-specific parameters. The Company's own funds include only Tier 1 unrestricted funds, without imposed capital add-ons.

E.2.g Information on the inputs used by the undertaking to calculate the Minimum Capital Requirement

The MCR has been calculated as prescribed by the Directives. A linear MCR is calculated based on parameters supplied in Annex XIX of the Directives and applied to net technical provisions without a risk margin and net written premium in the last twelve months. This value is compared to the 25% of the SCR and then the maximum of those compared to 45% of the SCR, of which the minimum is selected. This combined MCR is

then compared to the AMCR (absolute floor), prescribed by the Directives according to type of company and the maximum is selected.

E.2.h There has been a material change to the SCR (2021 €267m vs 2020 €239m) over the reporting period. SCR has increased by 12% whereas available capital has increased by only 3%. The reasons for the increase in SCR can be found in the earlier section E.2.b.

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

The Company did not make use of the duration-based equity sub-module in the reporting during the reporting period.

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

The Company has elected to use the Standard Formula, excluding undertaking specific parameters to calculate the Solvency Capital Requirement. As a consequence, no differences exist.

E.5 Non-compliance

The Company complied with the Solvency II Minimum Capital Requirement and Solvency Capital Requirement throughout the reporting period.

The Company held Own Funds in excess of both the Minimum Capital Requirement and Solvency Capital requirement throughout the reporting period.

E.6 Any other material information regarding the capital management of the Company

The Company does not have any other material information to disclose in regard to capital management.

Appendix

Quantitative Reporting Templates (QRT)

The following QRT templates, applicable to the Company, are required for the Solvency and Financial Condition Report.

Template ref	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 line of country
S.17.01.02	Non-Life Technical Provisions
S.19.01.21	Non-Life Claims Information
S.23.01.01	Own Funds
S.25.01.21	Solvency Capital Requirement
S.28.01.01	Minimum Capital Requirement

Annex I
S.02.01.02
Balance sheet

		Solvency II value
Assets		**C0010**
Intangible assets	**R0030**	
Deferred tax assets	**R0040**	
Pension benefit surplus	**R0050**	
Property, plant & equipment held for own use	**R0060**	1,534
Investments (other than assets held for index-linked and unit-linked contracts)	**R0070**	658,419
Property (other than for own use)	**R0080**	
Holdings in related undertakings, including participations	**R0090**	
Equities	**R0100**	
Equities - listed	**R0110**	
Equities - unlisted	**R0120**	
Bonds	**R0130**	604,806
Government Bonds	**R0140**	164,435
Corporate Bonds	**R0150**	440,372
Structured notes	**R0160**	
Collateralised securities	**R0170**	
Collective Investments Undertakings	**R0180**	53,613
Derivatives	**R0190**	
Deposits other than cash equivalents	**R0200**	
Other investments	**R0210**	
Assets held for index-linked and unit-linked contracts	**R0220**	
Loans and mortgages	**R0230**	
Loans on policies	**R0240**	
Loans and mortgages to individuals	**R0250**	
Other loans and mortgages	**R0260**	
Reinsurance recoverables from:	**R0270**	486,169
Non-life and health similar to non-life	**R0280**	486,169
Non-life excluding health	**R0290**	485,374
Health similar to non-life	**R0300**	794
Life and health similar to life, excluding health and index-linked and unit-linked	**R0310**	
Health similar to life	**R0320**	
Life excluding health and index-linked and unit-linked	**R0330**	
Life index-linked and unit-linked	**R0340**	
Deposits to cedants	**R0350**	16,745
Insurance and intermediaries receivables	**R0360**	23,919
Reinsurance receivables	**R0370**	351
Receivables (trade, not insurance)	**R0380**	27,207
Own shares (held directly)	**R0390**	
Amounts due in respect of own fund items or initial fund called up but not yet paid in	**R0400**	
Cash and cash equivalents	**R0410**	66,705
Any other assets, not elsewhere shown	**R0420**	1,488
Total assets	**R0500**	1,282,538

Annex I
S.02.01.02
Balance sheet

		Solvency II value
Liabilities		**C0010**
Technical provisions – non-life	**R0510**	787,630
Technical provisions – non-life (excluding health)	**R0520**	785,663
TP calculated as a whole	**R0530**	
Best Estimate	**R0540**	735,602
Risk margin	**R0550**	50,061
Technical provisions - health (similar to non-life)	**R0560**	1,967
TP calculated as a whole	**R0570**	
Best Estimate	**R0580**	1,771
Risk margin	**R0590**	195
Technical provisions - life (excluding index-linked and unit-linked)	**R0600**	
Technical provisions - health (similar to life)	**R0610**	
TP calculated as a whole	**R0620**	
Best Estimate	**R0630**	
Risk margin	**R0640**	
Technical provisions – life (excluding health and index-linked and unit-linked)	**R0650**	
TP calculated as a whole	**R0660**	
Best Estimate	**R0670**	
Risk margin	**R0680**	
Technical provisions – index-linked and unit-linked	**R0690**	
TP calculated as a whole	**R0700**	
Best Estimate	**R0710**	
Risk margin	**R0720**	
Contingent liabilities	**R0740**	
Provisions other than technical provisions	**R0750**	
Pension benefit obligations	**R0760**	
Deposits from reinsurers	**R0770**	11,560
Deferred tax liabilities	**R0780**	
Derivatives	**R0790**	
Debts owed to credit institutions	**R0800**	
Financial liabilities other than debts owed to credit institutions	**R0810**	
Insurance & intermediaries payables	**R0820**	15,840
Reinsurance payables	**R0830**	64,259
Payables (trade, not insurance)	**R0840**	2,063
Subordinated liabilities	**R0850**	
Subordinated liabilities not in BOF	**R0860**	
Subordinated liabilities in BOF	**R0870**	
Any other liabilities, not elsewhere shown	**R0880**	2,466
Total liabilities	**R0900**	883,818
Excess of assets over liabilities	**R1000**	398,720

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

		Line of Business for: **non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)**												Line of business for:				Total
		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	Health	Casualty	Marine, aviation, transport	Property	
		C0010	**C0020**	**C0030**	**C0040**	**C0050**	**C0060**	**C0070**	**C0080**	**C0090**	**C0100**	**C0110**	**C0120**	**C0130**	**C0140**	**C0150**	**C0160**	**C0200**
Premiums written																		
Gross - Direct Business	**R0110**																	
Gross - Proportional reinsurance accepted	**R0120**		426		37,053		68,466	71,505	121,910	66,565								365,926
Gross - Non-proportional reinsurance accepted	**R0130**													229	16,736	13,176	117,549	147,690
Reinsurers' share	**R0140**		329		30,002		54,446	54,997	97,692	51,144				179	13,082	10,238	110,719	422,826
Net	**R0200**		97		7,051		14,020	16,508	24,218	15,421				50	3,655	2,938	6,831	90,790
Premiums earned																		
Gross - Direct Business	**R0210**																	
Gross - Proportional reinsurance accepted	**R0220**		537		29,230		54,204	54,730	85,261	50,070								274,032
Gross - Non-proportional reinsurance accepted	**R0230**													233	18,095	13,899	116,211	148,438
Reinsurers' share	**R0240**		348		23,100		38,438	38,154	62,781	34,609				181	13,265	10,370	108,601	329,848
Net	**R0300**		189		6,131		15,765	16,576	22,480	15,461				52	4,829	3,529	7,610	92,621
Claims incurred																		
Gross - Direct Business	**R0310**																	
Gross - Proportional reinsurance accepted	**R0320**		543		19,749		40,334	34,001	61,566	27,317								183,510
Gross - Non-proportional reinsurance accepted	**R0330**													468	11,732	8,879	240,854	261,932
Reinsurers' share	**R0340**		335		15,606		27,932	23,437	42,754	18,517				303	9,845	6,414	215,269	360,411
Net	**R0400**		208		4,144		12,402	10,564	18,812	8,800				164	1,887	2,465	25,585	85,031
Changes in other technical provisions																		
Gross - Direct Business	**R0410**																	
Gross - Proportional reinsurance accepted	**R0420**																	
Gross - Non- proportional reinsurance accepted	**R0430**																	
Reinsurers'share	**R0440**																	
Net	**R0500**																	
Expenses incurred	**R0550**		37		-622		2,583	3,215	3,985	4,633				19	1,669	391	3,466	19,375
Other expenses	**R1200**																	
Total expenses	**R1300**																	19,375

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

		Line of Business for: **life insurance obligations**						**Life reinsurance obligations**		Total
		Health insurance	Insurance with profit participation	Index-linked and unit-linked insurance	Other life insurance	Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health	Health reinsurance	Life-reinsurance	
		C0210	**C0220**	**C0230**	**C0240**	**C0250**	**C0260**	**C0270**	**C0280**	**C0300**
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**									

Annex I
S.05.02.01
Premiums, claims and expenses by country

		Home Country	Top 5 countries (by amount of gross premiums written) - non-life obligations					Total Top 5 and home country
		C0010	C0020	C0030	C0040	C0050	C0060	C0070
	R0010		FR	DE	BM	ES	GB	
		C0080	C0090	C0100	C0110	C0120	C0130	C0140
Premiums written								
Gross - Direct Business	R0110							
Gross - Proportional reinsurance accepted	R0120	4,003	129,170	101,464	23,262	21,381	14,870	294,150
Gross - Non-proportional reinsurance accepted	R0130	2,591	45,960	36,748	1,426	2,535	7,506	96,768
Reinsurers' share	R0140	5,378	146,078	115,191	18,247	17,838	18,334	321,066
Net	R0200	1,217	29,052	23,021	6,442	6,078	4,042	69,852
Premiums earned								
Gross - Direct Business	R0210							
Gross - Proportional reinsurance accepted	R0220	2,282	101,009	62,839	13,944	22,546	11,593	214,213
Gross - Non-proportional reinsurance accepted	R0230	1,906	45,438	35,673	1,686	2,580	8,032	95,314
Reinsurers' share	R0240	3,431	113,602	80,900	10,744	16,744	14,286	239,708
Net	R0300	756	32,845	17,612	4,886	8,382	5,338	69,819
Claims incurred								
Gross - Direct Business	R0310							
Gross - Proportional reinsurance accepted	R0320	1,573	73,015	41,874	3,707	17,089	15,218	152,478
Gross - Non-proportional reinsurance accepted	R0330	552	77,198	109,427	-1,027	2,192	8,236	196,577
Reinsurers' share	R0340	2,491	119,948	128,032	4,307	14,079	15,598	284,456
Net	R0400	-366	30,265	23,269	-1,627	5,202	7,856	64,599
Changes in other technical provisions								
Gross - Direct Business	R0410							
Gross - Proportional reinsurance accepted	R0420							
Gross - Non- proportional reinsurance accepted	R0430							
Reinsurers'share	R0440							
Net	R0500							
Expenses incurred	R0550	268	2,985	9,895	28	2,581	1,493	17,250
Other expenses	R1200							
Total expenses	R1300							17,250

Annex I
S.05.02.01
Premiums, claims and expenses by country

Annex I
S.05.02.01
Premiums, claims and expenses by country

		Home Country	Top 5 countries (by amount of gross premiums written) - life obligations					Total Top 5 and home country
		C0150	C0160	C0170	C0180	C0190	C0200	C0210
	R1400							
		C0220	C0230	C0240	C0250	C0260	C0270	C0280
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							

Annex I
S.17.01.02
Non-life Technical Provisions

		Direct business and accepted proportional reinsurance												Accepted non-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	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance	
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180
Technical provisions calculated as a whole	R0010																	
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole	R0050																	
Technical provisions calculated as a sum of BE and RM																		
Best estimate																		
Premium provisions																		
Gross	R0060		-199		-6,321		-13,969	-2,190	-28,047	-35,311				-58	-2,748	-134	-28,920	-117,898
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140		-98		-2,657		-2,938	3,034	-9,832	-14,993				-42	-1,584	134	-19,193	-48,169
Net Best Estimate of Premium Provisions	R0150		-101		-3,664		-11,031	-5,224	-18,216	-20,319				-16	-1,164	-267	-9,727	-69,728
Claims provisions																		
Gross	R0160		1,244		24,766		88,264	82,764	93,897	79,827				784	83,271	32,395	368,061	855,271
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240		655		16,066		51,856	48,835	56,738	44,768				280	43,909	18,436	252,796	534,338
Net Best Estimate of Claims Provisions	R0250		589		8,699		36,408	33,929	37,159	35,059				504	39,363	13,958	115,265	320,933
Total Best estimate - gross	R0260		1,046		18,445		74,294	80,574	65,849	44,515				726	80,524	32,261	339,141	737,374
Total Best estimate - net	R0270		489		5,035		25,376	28,705	18,944	14,740				488	38,199	13,691	105,538	251,205
Risk margin	R0280		98		1,007		5,077	5,743	3,790	2,949				98	7,642	2,739	21,114	50,256
Amount of the transitional on Technical Provisions																		
Technical Provisions calculated as a whole	R0290																	
Best estimate	R0300																	
Risk margin	R0310																	
Technical provisions - total																		
Technical provisions - total	R0320		1,143		19,452		79,371	86,317	69,639	47,464				823	88,166	35,000	360,255	787,630
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	R0330		557		13,409		48,918	51,869	46,906	29,775				237	42,325	18,570	233,603	486,169
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	R0340		586		6,043		30,453	34,448	22,733	17,689				586	45,841	16,430	126,652	301,461

Annex I
S.19.01.21
Non-life Insurance Claims Information

Total Non-Life Business

Accident year / Underwriting year	Z0020	Underwriting year [UWY]

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

Year		Development year 1	2	3	4	5	6	7	8	9	10 & +		In Current year	Sum of years (cumulative)
	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110		C0170	C0180
Prior R0100											21,331	R0100	21,331	21,331
2012 R0160	1,854	19,584	3,985	2,075	1,477	1,596	2,425	285	1,203	35		R0160	35	34,519
2013 R0170	2,892	27,169	10,260	3,780	3,413	734	680	181	1,286			R0170	1,286	50,394
2014 R0180	-1,762	32,281	11,991	5,619	5,320	1,262	1,286	295				R0180	295	56,293
2015 R0190	2,098	83,102	21,104	8,093	4,225	3,032	1,275					R0190	1,275	122,929
2016 R0200	-3,453	36,289	11,663	4,925	1,811	902						R0200	902	52,136
2017 R0210	-2,310	47,939	11,204	9,102	17,852							R0210	17,852	83,787
2018 R0220	-2,107	63,611	18,595	29,818								R0220	29,818	109,917
2019 R0230	-2,228	49,903	31,068									R0230	31,068	78,742
2020 R0240	-2,749	46,942										R0240	46,942	44,193
2021 R0250	8,574											R0250	8,574	8,574
											Total	R0260	159,377	662,815

Gross undiscounted Best Estimate Claims Provisions
(absolute amount)

Year		Development year 1	2	3	4	5	6	7	8	9	10 & +		Year end (discounted data)
	C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300		C0360
Prior R0100											6,394	R0100	5,889
2012 R0160					12,859	12,308	8,214	5,941	5,161	4,958		R0160	4,576
2013 R0170				15,464	10,995	8,574	6,455	6,641	7,694			R0170	7,127
2014 R0180			21,603	17,061	14,747	10,462	8,974	8,518				R0180	7,768
2015 R0190		55,745	26,621	23,290	17,761	13,893	12,227					R0190	11,215
2016 R0200	53,258	38,693	20,889	18,868	16,514	15,009						R0200	13,731
2017 R0210	91,948	73,200	56,272	41,894	31,819							R0210	29,387
2018 R0220	91,958	78,707	68,966	63,555								R0220	59,247
2019 R0230	83,374	113,448	101,082									R0230	97,027
2020 R0240	186,776	217,267										R0240	211,922
2021 R0250	412,087											R0250	407,382
											Total	R0260	855,271

Annex I
S.23.01.01
Own funds

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation (EU) 2015/35						
Ordinary share capital (gross of own shares)	R0010	0	0			
Share premium account related to ordinary share capital	R0030					
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040					
Subordinated mutual member accounts	R0050					
Surplus funds	R0070					
Preference shares	R0090					
Share premium account related to preference shares	R0110					
Reconciliation reserve	R0130	107,984	107,984			
Subordinated liabilities	R0140					
An amount equal to the value of net deferred tax assets	R0160					
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180	290,736	290,736			
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds						
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220					
Deductions						
Deductions for participations in financial and credit institutions	R0230					
Total basic own funds after deductions	R0290	398,720	398,720			
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300					
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310					
Unpaid and uncalled preference shares callable on demand	R0320					
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330					
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340					
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350					
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360					
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370					
Other ancillary own funds	R0390					
Total ancillary own funds	R0400					
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	398,720	398,720			
Total available own funds to meet the MCR	R0510	398,720	398,720			
Total eligible own funds to meet the SCR	R0540	398,720	398,720			
Total eligible own funds to meet the MCR	R0550	398,720	398,720			
SCR	R0580	267,079				
MCR	R0600	66,770				
Ratio of Eligible own funds to SCR	R0620	149.29%				
Ratio of Eligible own funds to MCR	R0640	597.16%				

		C0060
Reconciliation reserve		
Excess of assets over liabilities	R0700	398,720
Own shares (held directly and indirectly)	R0710	
Foreseeable dividends, distributions and charges	R0720	
Other basic own fund items	R0730	290,736
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	
Reconciliation reserve	R0760	107,984
Expected profits		
Expected profits included in future premiums (EPIFP) - Life business	R0770	
Expected profits included in future premiums (EPIFP) - Non- life business	R0780	117,898
Total Expected profits included in future premiums (EPIFP)	R0790	117,898

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

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0120
Market risk	R0010	120,567		
Counterparty default risk	R0020	30,389		
Life underwriting risk	R0030			
Health underwriting risk	R0040	979		
Non-life underwriting risk	R0050	166,071		
Diversification	R0060	-73,048		
Intangible asset risk	R0070			
Basic Solvency Capital Requirement	R0100	244,957		

Calculation of Solvency Capital Requirement		C0100
Operational risk	R0130	22,121
Loss-absorbing capacity of technical provisions	R0140	
Loss-absorbing capacity of deferred taxes	R0150	
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	
Solvency capital requirement excluding capital add-on	R0200	267,079
Capital add-on already set	R0210	
Solvency capital requirement	R0220	267,079
Other information on SCR		
Capital requirement for duration-based equity risk sub-module	R0400	
Total amount of Notional Solvency Capital Requirement for remaining part	R0410	
Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420	
Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios	R0430	
Diversification effects due to RFF nSCR aggregation for article 304	R0440	

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

Linear formula component for non-life insurance and reinsurance obligations

		C0010
MCR_{NL} Result	R0010	50,666

		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	489	97
Workers' compensation insurance and proportional reinsurance	R0040		
Motor vehicle liability insurance and proportional reinsurance	R0050	5,035	7,051
Other motor insurance and proportional reinsurance	R0060		
Marine, aviation and transport insurance and proportional reinsurance	R0070	25,376	14,020
Fire and other damage to property insurance and proportional reinsurance	R0080	28,705	16,508
General liability insurance and proportional reinsurance	R0090	18,944	24,218
Credit and suretyship insurance and proportional reinsurance	R0100	14,740	15,421
Legal expenses insurance and proportional reinsurance	R0110		
Assistance and proportional reinsurance	R0120		
Miscellaneous financial loss insurance and proportional reinsurance	R0130		
Non-proportional health reinsurance	R0140	488	50
Non-proportional casualty reinsurance	R0150	38,199	3,655
Non-proportional marine, aviation and transport reinsurance	R0160	13,691	2,938
Non-proportional property reinsurance	R0170	105,538	6,831

Linear formula component for life insurance and reinsurance obligations

		C0040
MCR_L Result	R0200	

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

Overall MCR calculation

		C0070
Linear MCR	R0300	50,666
SCR	R0310	267,079
MCR cap	R0320	120,185
MCR floor	R0330	66,770
Combined MCR	R0340	66,770
Absolute floor of the MCR	R0350	3,600
		C0070
Minimum Capital Requirement	R0400	66,770