

Newell Insurance DAC (“NIDAC” or the “Company”)
Solvency & Financial Condition Report (“SFCR”)
December 31, 2023

Contents

INTRODUCTION.....	4
SUMMARY.....	4
A. BUSINESS & PERFORMANCE	5
A.1 Business.....	5
A.2 Underwriting Performance.....	6
A.3 Investment Performance.....	7
A.4 Performance of other activities.....	7
A.5 Any other information.....	7
B. SYSTEM OF GOVERNANCE	8
B.1 General Information on the System of Governance.....	8
B.2 Fit & Proper requirements.....	10
B.3 Risk Management System including the own risk and solvency assessment.....	11
B.4 Internal Control System	13
B.5 Internal Audit Function	15
B.6 Actuarial Function	15
B.7 Outsourcing.....	16
B.8 Any other information	17
C.RISK PROFILE	18
C.1 Underwriting Risk.....	18
C.2 Market Risk	19
C.3 Credit Risk	20
C.4 Liquidity Risk	20
C.5 Operational Risk.....	20
C.6 Other Material Risk.....	21
C.7 Any other information.....	21
D. VALUATION FOR SOLVENCY PURPOSES	22
D.1 Assets	22
D.2 Technical Provisions	23
D.3 Any Other Liabilities	26
D.4 Alternative Methods of Valuation.....	26
D.5 Any Other Information	26
E. CAPITAL MANAGEMENT	27
E.1 Own Funds.....	27

E.2 Solvency Capital Requirement & Minimum Capital Requirement.....28

E.3 Use of Duration Based Equity Risk Sub Model in calculation of the SCR.....29

E.4 Differences between the Standard Model & Any Internal Model 29

E.5 Any non-compliance with MCR and SCR.....29

E.6 Any Other Information 30

E.7 Additional Voluntary Information 30

APPENDICES 31

INTRODUCTION

Newell Insurance DAC ('NIDAC' or 'the Company') has prepared the below Solvency and Financial Condition Report on a solo basis in accordance with the regulations set out in Articles 292 –297 of the Solvency II Delegated Acts together with the Guidelines on reporting and public disclosure issued by EIOPA.

SUMMARY

This Report refers to the business of Newell Insurance DAC, a captive insurer, authorised and supervised by the Central Bank of Ireland. It provides the reader with information on the Company's business and performance, system of governance, risk profile, valuation for solvency purposes and capital management for the reporting period ended 31 December 2023.

Following a strategic review by the Company's parent, Newell Brands Inc., of its overall captive structure, the Company ceased writing insurance business effective September 2018 and has been in run-off since this date.

When actively trading, the Company provided insurance cover for affiliated companies of Newell Brands Inc., a global consumer goods company headquartered in the U.S., in respect of property and general liability cover. Investment of Company funds is in line with the documented investment strategy, reflecting a 'prudent person' approach to the management of counterparty, concentration, interest rate and currency risk.

The Board has identified the key risks to which NIDAC is exposed and established appropriate corporate governance, risk management and reporting mechanisms to ensure that the identified risks remain relevant, and that they are managed and reported on with appropriate levels of detail and frequency. The Company has established a comprehensive suite of risk policies and implemented a series of internal controls to ensure that NIDAC can be managed in accordance with its governance and risk management systems. Documented escalation mechanisms are in place to ensure that any breaches in risk limits and tolerances, internal controls and governance requirements can be reported promptly to the appropriate individuals.

Risks to which the Company is exposed are well understood and are used to determine the level of solvency and capital required. The results of this exercise are used to better inform decision making within the Company.

As at 31 December 2023, the Company had eligible own funds of \$7.224m available to meet its Solvency Capital Requirement (SCR) of \$4.548m and Minimum Capital Requirement (MCR) of \$4.420m resulting in a Solvency Ratio of 159% which is in line with the Company's risk appetite. The Board of Directors is satisfied that the Company has adequate and appropriate capital to support the Company. There were no instances of non-compliance with the capital requirements during the period.

BUSINESS & PERFORMANCE

A.1 Business

NIDAC is incorporated in Ireland and in line with the requirements of the Companies Act 2014, converted to a designated activity company ('DAC'), limited by shares, effective 23 December 2015. The Company's business address is Third Floor, The Metropolitan Building, James Joyce Street, Dublin 1, Ireland.

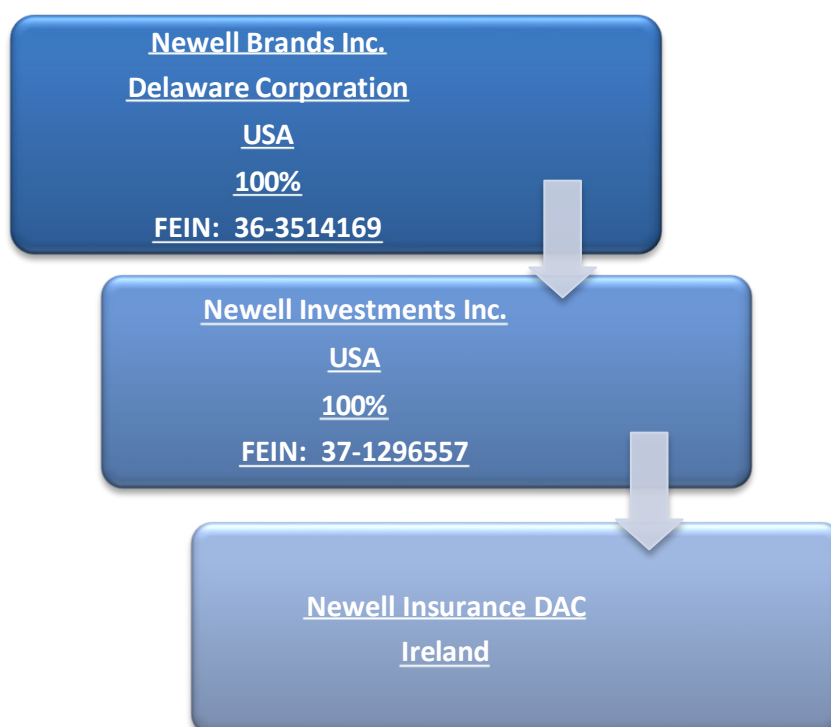
NIDAC is licensed by the Central Bank of Ireland ("CBI") as a non-life captive insurance undertaking. The insurance supervision division at the CBI may be contacted at their offices in New Wapping Street, North Wall Quay, Dublin 1, Ireland. NIDAC conducts all its significant business activities from its offices in Ireland. The principal activity of the Company is the transaction of non-life international insurance and reinsurance business. The Company is authorised to write the following classes:

- Class 8 – Fire and Natural Forces
- Class 9 – Other Damage to Property
- Class 13 – General Liability
- Class 16 – Miscellaneous Financial Loss.

The Company has no full-time equivalent employees.

NIDAC conducts all its significant business activities from its offices in Ireland with the support of the Company's captive manager.

The Company's external auditor is BDO, which is located at Block 3, Miesian Plaza, 50-58 Baggot Street Lower, Dublin 2.



The Company's immediate parent is Newell Investments Inc., a wholly owned subsidiary of Newell Brands Inc. The Company's ownership structure is as follows: Most of business written by the captive

related to direct insurance of Newell Brands operations in the United States of America and the European Union. Rest-of-world risks were written through a fronting insurer with the risk being ceded to NIDAC. The Company's insurance exposure was mitigated by setting limits of liability within its insurance programme and the purchase of reinsurance from a panel of highly rated reinsurers (specific to the property programme only).

Following a strategic review of Newell Brands Inc. overall captive structure, the Board decided that following the expiration of the contracts issued for the 2017-18 period of cover, no further business would be written. Those policies expired on 01 September 2018 and 15 September 2018 respectively, and as a result, the Company has been in run-off since this date.

There were no significant legal or regulatory issues impacting the Company during the period.

A.2 Underwriting Performance

NIDAC's business was the provision of insurance in a manner which enhanced the risk management, economic and administrative efficiency of the Newell Brands Group. Insurance was provided under two lines of business:

- Fire and other damage to property
- General liability

The Company's underwriting performance for the reporting period ended 31 December 2023 and the comparative period is set out below. Amounts are presented in US Dollar (US\$), which is the Company's functional currency:

US\$	2023	2022
Gross Premiums Written	-	-
Reinsurers' Share	-	-
Net Premiums Written	-	-
Net Premiums Earned	-	-
Net Claims Paid	(133,468)	(57,325)
Net Change in Provision for Claims	446,256	197,488
Net Operating Expenses	(290,519)	(270,366)
Underwriting Result	22,269	(130,203)

No premiums were written during the year 2023 in line with the captive's run-off status. A full split of the 2023 underwriting result is shown in the following Quantitative Reporting Templates appended to this report; S.05.01.02 – Premiums, Claims and Expenses by line of business, and S.04.05.21 – Premiums, Claims and Expenses by country.

The principal risks and uncertainties that the Company faces are, by the very nature of the business, those for which it provides or has provided insurance cover. Up to the point at which the Company ceased underwriting activities, the Company sought to ensure that it collected sufficient premium

income to meet the cost of potential claims over time, but the uncertainty surrounding the severity and frequency of claims can lead to significant variation in the Company's performance in the short term. Whilst considerable judgment is involved, the Directors adopt a prudent approach to the provision and valuation of technical provisions, with annual support and certification being provided by an external actuary.

A.3 Investment Performance

The Company allocates its investment portfolio in two distinct portfolios, as described below:

- Fixed Deposits: The Company holds fixed short-term US Dollar deposits with preapproved credit institutions.
- Intercompany Loan: Available funds are invested, as deemed prudent by the Board of Directors, in an intercompany loan with Newell Brands Ireland Services DAC, a wholly owned subsidiary of Newell Brands Inc. A parental guarantee has been provided by Newell Brands Inc. which covers the intercompany loan to a maximum value of US\$7.00m. As at 31 December 2023 the value of the intercompany loan was US\$6.14m (2022: US\$6.04m).

Investment income for the year to 31 December 2023 amounted to US\$215.94k compared to US\$116.60k, in 2022.

The Company does not have any investments in securitisation.

A.4 Performance of other activities

NIDAC does not engage in any activities other than those associated with captive insurance and has not entered into any leasing agreements.

A.5 Any other information

There is no other information to report.

B. SYSTEM OF GOVERNANCE

B.1 General Information on the System of Governance

In aiming to meet the requirements for sound corporate governance, ensuring efficient conduct of business and to protect the interests of the Company's stakeholders, the Company has a comprehensive Governance and Risk Management system in place.

It is the responsibility of the Board of Directors to ensure that risks are fully understood and appropriately managed in accordance with this framework. Risk management, reporting and auditing processes and control processes have been put in place in a manner which reflects the nature and scale of the captive's activities.

The Governance and Risk Management System of the Company may be described as relying on four cornerstones:

- 1) Governance Framework, aligned with the Company's strategic objectives, providing top level oversight by the Board, clear ownership and accountability for risks, as well as clear escalating and reporting channels.
- 2) Risk Management System which details the Company's strategic objectives in documented Risk Policies. For each risk, limits and operational checkpoints, as well as functional identification mitigation and monitoring processes are documented.
- 3) A series of Internal Controls, defining the architecture of processes required to manage the Company in accordance with its Governance and risk management framework.
- 4) A Risk Register combining operational and risk management processes to deliver a descriptive analysis of material risks threatening at least one of the Company's global strategy objectives.

There have been no material changes to this structure since the prior reporting period. NIDAC implemented the above framework in advance of the inception of Solvency II to ensure compliance with these regulations.

Given the scale and complexity of the Company, and having reviewed the risks facing the Company thoroughly, the Board are satisfied that the system of governance in place is adequate.

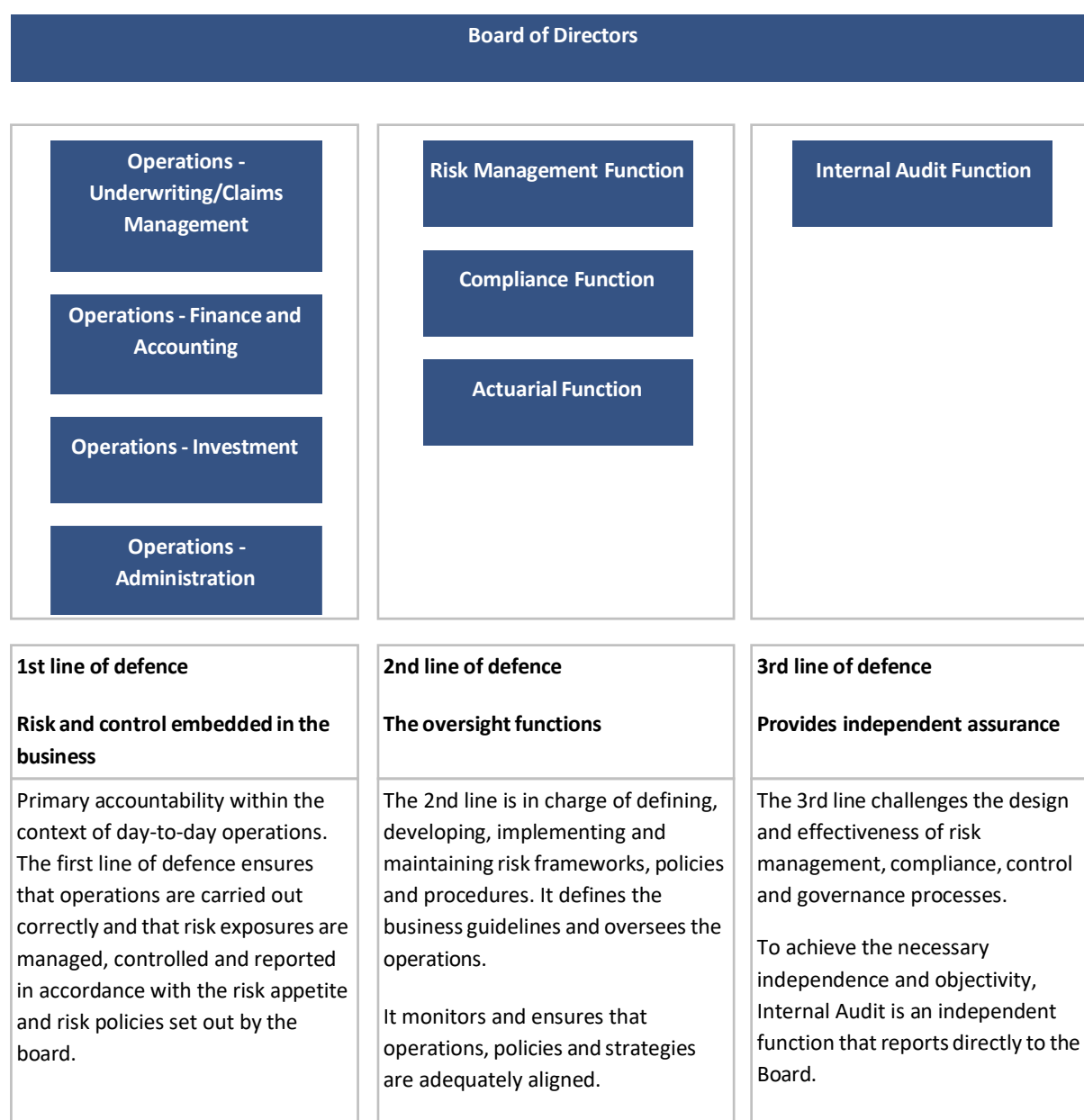
To achieve the Company's objectives, the Board has established a system of governance with the following core components:

- the Board of Directors is the focal point of the governance system and is ultimately accountable and responsible for the performance and conduct of the Company and, as such, must have at its disposal all required capabilities to achieve its duties;
- all authority emanates from the Board of Directors and responsibilities are delegated in such a manner to ensure that no one individual has unfettered powers of decision;
- an embedded Compliance Function aiming to ensure the continuous compliance of the Company with all applicable legal, regulatory and administrative requirements;

- an appropriate segregation of duties to enable the Risk Management, Internal Audit, Actuarial and Compliance Function to perform independent risk and business control mitigation, monitoring and reporting tasks;
- a meaningful and practical approach in documenting policies and strategies to formalise all processes in an efficient and fit-for-purpose manner; and
- structured reporting processes to enable an appropriate escalation of risks and issues to the Board of Directors to ensure a clear and comprehensive information process allowing the Board to conduct business in an efficient and prudent manner in line with the strategic objectives.

Given the limited scale and complexity of the Company, and having reviewed the risks facing the company thoroughly, the Board are satisfied that the system of governance in place is adequate.

According to these principles, the chosen governance model is one of "three lines of defence" which is illustrated as follows:



The Board undertake responsibility for performing the equivalent function of an Audit Committee in relation to the reporting period ended 31 December 2023.

Key Functions

The key functions of Risk Management, Internal Audit, Actuarial, Compliance and Operations have clear and defined lines of reporting directly to the Board. This is facilitated by the straightforward nature of the Company's structure and fit-for-purpose documented policies and procedures which are clearly communicated and well understood by all relevant parties. The Board has ensured that the key functions are appropriately resourced and have the necessary authority and operational independence to perform their roles. The Company has engaged Willis Towers Watson Management (Dublin) Limited ('WTW'), taking over from Aon Insurance Managers (Dublin) Limited ('AIMD') at the end of the reporting period, for the provision of management services, under the terms of an outsourced service and management agreement which is overseen by the Board of Directors.

Remuneration and material transactions

The members of the Board of Directors receive no remuneration for their services as directors to the Company. There are no employees and consequently no remuneration is paid. As a captive insurer, all NIDAC's inward premium flows, if any, and claims payments relate to insured risks of the shareholder group. Also, as mentioned at A.3 above, the Company has a loan to Group as at 31 December 2023. Other than these transactions which arise in the normal course of business, the Company had no material transactions during the reporting period with members of the shareholder group.

The Company is managed by Willis Towers Watson Management (Dublin) Limited ('WTW'), having taken over from Aon Insurance Managers (Dublin) Limited (AIMD) at the end of the reporting period, under the terms of a management agreement. Aidan Pyke, having resigned his position as Non-Executive Director on 31st December 2023 was both an employee of AIMD, and a director of Newell Insurance DAC. There was a fixed amount of management fees paid to AIMD under the terms of the management agreement. Other than this there were no other transactions during the period with members of the Board of Directors.

B.2 Fit & Proper requirements

The 'Fit and Proper' requirement is the standard required by the Central Bank of Ireland when appointing pre-approved controlled function holders. NIDAC is satisfied that appointed individuals performing controlled functions meet all relevant regulatory requirements and have a suitable level of training and qualification to enable them to carry out their respective duties.

In selecting individuals as directors or function holders, the Company takes account of the following factors:

- specific requirements of the role
- the skills, experience and relevant qualifications of the proposed individual
- results of due diligence enquiries
- conflicts of interest
- time requirements and other commitments
- competence and integrity
- financial soundness

Consideration is given to ensuring an appropriate mix of knowledge, skills and experience across the Board of Directors. The Compliance Function adopts appropriate controls in the registration of its

individuals across the Group ensuring that identified individuals meet the regulators' fit and proper criteria at the point of registration.

Roles and Responsibilities Detail

Key Roles	Outsourcing	Responsible
Board of Directors	No	Karl Miller (American) Aidan Pyke (Irish) resigned 31 December 2023 Julia Donegan (Irish)
Risk Management Function	Yes (External)	Aon Insurance Managers (Dublin) Limited, succeeded by WTW Management (Dublin) Limited on 31 December 2023, provide a named person to act as the Head of Risk Management Function
Compliance Function	Yes (External)	Aon Insurance Managers (Dublin) Limited, succeeded by WTW Management (Dublin) Limited on 31 December 2023, provide a named person to act as the Head of Compliance Function
Operations - Underwriting/Claims Management	Yes (External)	Aon Insurance Managers (Dublin) Limited, succeeded by WTW Management (Dublin) Limited on 31 December 2023
Operations - Finance and Accounting	Yes (External)	Aon Insurance Managers (Dublin) Limited, succeeded by WTW Management (Dublin) Limited on 31 December 2023
Operations – Investment	Yes (External)	Aon Insurance Managers (Dublin) Limited, succeeded by WTW Management (Dublin) Limited on 31 December 2023
Operations – Administration	Yes (External)	Aon Insurance Managers (Dublin) Limited, succeeded by WTW Management (Dublin) Limited on 31 December 2023
Internal Audit Function	No	The Head of Internal Audit Function is carried out by a member of the Board with assistance from Grant Thornton
Actuarial Function	Yes (External)	Aon Global Risk Consulting (UK), succeeded by WTW Strategic Risk Consulting on 31 December 2023, provide a named person to act as Head of Actuarial Function

B.3 Risk Management System including the own risk and solvency assessment

The Company's Risk Management System:

- sets out the level of risk acceptable by the Company (Risk Appetite and risk tolerance);
- identifies the risks which represent a threat to the achievement of its strategic objectives;
- identifies, defines and regularly measures key risk indicators enabling an efficient monitoring of risks;
- defines the appropriate actions to reduce the Company's risk exposure;
- ensures the risk management framework is implemented in day-to-day business processes; and
- regularly reviews controls and mitigation actions to ensure that they remain relevant and effective.

To achieve these objectives, the Risk Management System of the Company has been clearly documented and specified through risk management policies to each key risk category. The key risk categories for which the Company has set up specific control and monitoring mechanisms are:

- Underwriting/Reserving
- Asset Liability Management ("ALM")
- Investment
- Liquidity and concentration
- Operational
- Reinsurance and other risk mitigation techniques
- Strategic

In addition to these policies, an outsourcing policy defining the key rules and criteria to be respected by a service provider has been determined.

Detailed ORSA Process

Each year, NIDAC produces an Own Risk and Solvency Assessment ("ORSA") report. The approach may be summarised as follows:

Define the Stress Scenarios

Stress testing and scenario analysis are used to assess whether the available and future capital are sufficient in expected and stressed situations. The Board selects appropriate stress and scenario tests taking into account a review of all material quantifiable and non-quantifiable risks, the most significant risks from the risk register, key capital drivers from the base SCR calculation, results from prior stress tests and potential strategic decisions.

Stress the Financial Plan

Stress test scenarios are embedded into the projected financial plan under Solvency II GAAP. Related SCR/MCR and solvency ratios are then calculated for each year, resulting in the Stressed Financial Plan and the solvency impact of validated scenarios. The tasks of this process are conducted by the Actuarial Function and validated by the Risk Management Function.

Assess prospective solvency needs based on the Stressed Financial Plan

The Risk Management Function identifies potential additional mitigation actions to reduce the potential impact of the Stress Scenarios. The main purpose of this stage is to identify and assess any relevant complementary control, mitigation actions or review of the Risk Appetite to match prospective solvency needs with capital position. Any remaining solvency gap will be covered through a relevant capital plan, i.e. defining the measures to restore the Company's solvency margin should the assumed scenarios occur.

Produce the ORSA Report

The ORSA report will bring clarity over projected risk assessments and solvency needs to three different stakeholders. Stakeholder	Expectation	ORSA Report
Board of Directors	Matching projected risks vs the Risk Appetite framework.	Will provide a clear and prospective understanding of critical risk exposures and their relationship with Risk Appetite boundaries.
Shareholders	Detailed and prospective understanding about the risk of bankruptcy and potential need for future additional capital.	Will provide a plan for capital needs on the time horizon of the financial planning.
Supervisory Authority	Detailed and prospective understanding of potential ORSA deviations compared to the SCR under Pillar I.	Will gather information about projected Solvency ratios; - explanations about deviations due to specific critical risks exposures.

The ORSA process described above ensures that ORSA is integrated in the decision-making and business planning process. Furthermore, monitoring procedures as set out in the risk management policies ensure that risk exposures are measured on a regular basis, triggering exception reports as necessary for the Board.

In line with CBI requirements, the Head of Actuarial Function provides an Actuarial Opinion to the Board of Directors in respect of the ORSA at the same time as he presents the results of the ORSA process to the Board.

The Risk Appetite Framework is reviewed at each Board meeting. The Company ensures that it meets the Regulatory Solvency Capital Requirement at all times.

B.4 Internal Control System

The Internal Control System embedded in the Company's operations is a mix of processes and undertaken by all stakeholders within the Company to provide reasonable assurance that the strategic objectives will be achieved.

To achieve the objectives, the Internal Control framework of the Company is structured around five complementary components.

Component	Contents
1) Control environment	A strong "risk and control" culture is embedded within the Company's operations through the continuous oversight of the Board of Directors and the communication to all internal stakeholders of all governance and risk principles through the present manual.
2) Risk assessment	Procedures and policies are detailed and formalized to disclose the way of identifying, managing, controlling, mitigating and reporting issues relating to each risk category.
3) Reporting channels	Clear and structured reporting processes are in place enabling the Board of Directors to have access to relevant, complete, reliable, correct and timely communication related to internal as well as external events.
4) Monitoring process	The appropriate escalation of significant issues to the Board of Directors, the ongoing involvement of all internal stakeholders as well as the Internal Audit process enables the Company to continuously monitor and adapt when necessary, its Internal Control System.
5) Control activities	The Company developed a comprehensive set of preventive, detective or corrective control actions embedded in its daily operations, as formalized hereafter.

Detailed Processes and Embedded Control Activities

To set out how the Internal Control System is implemented the Company's processes and related control activities are documented, monitored and reviewed on a regular basis.

These items are designed by the Risk Management Function, approved by the Board of Directors and evaluated by the Internal Audit Function. They are reviewed as often as necessary but, at a minimum, once a year.

Each of the macro-processes are detailed in key processes and workflow processes aimed at describing how the tasks and actions composing the given process are shared between the key functions of the Company and at clarifying related roles, responsibilities and embedded control activities.

Compliance Function

The Company has outsourced its Compliance Function to its Insurance Managers. The Insurance Managers have appointed a Head of Compliance who is responsible for overseeing all compliance activities and ensuring the Compliance Function of the Company is adequately resourced. The Compliance Function reports to the Board at each Board meeting on its activities.

The responsibilities of the Compliance Function include:

- utilisation of compliance management practices that contribute to the use of sound, responsible and sustainable business practices by the Company;
- presentation of an annual compliance plan to the Board of Directors, outlining specific areas which it will focus on during a particular year;
- promotion of a culture of compliance within the organisation;
- maintenance of a comprehensive compliance risk management control and reporting system in conjunction with the Risk Management Function to assist in managing the compliance risk faced by the Company;
- consideration of possible future changes in the legal environment and their potential effect on the Company as well as providing regular compliance and regulatory updates to the Board of

Directors;

- identification and communication throughout the Company of the laws, regulations and codes of conduct to which the Company is subject and assisting to embed compliance with these in the way the Company does business; and
- investigation and follow up of compliance breaches, ensuring timely reporting to the Board and in certain circumstances to outside bodies such as the CBI.

B.5 Internal Audit Function

Purpose & Objectives

The purpose of the Internal Audit Function is to serve as an independent function that objectively evaluates and recommends improvements to the Company's Internal Control System by facilitating an objective and independent assessment.

It assists the Company to accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes employed by the Company. The audit approach is risk based and in line with an annual audit plan which is provided by the Head of Internal Audit to the Board of Directors.

Independence and Impartiality

The Company's Internal Audit Function must be independent of the activities audited and must also be independent from the operational functions and the Board of Directors.

The Internal Audit Function is free to report its findings and appraisals and to disclose them to the Board as required. This principle of independence of the Internal Audit Function demands that the Internal Audit Function operates under the direct control of the Board of the Company.

B.6 Actuarial Function

The Actuarial Function is carried out by WTW Strategic Risk Consulting who provides a nominated individual to act as Head of Actuarial Function.

Roles and Responsibilities of the Actuarial Function include:

- coordination of the calculation of technical provisions;
- ensuring the appropriateness of the methodologies, underlying models and assumptions made in the calculation of technical provisions;
- assessment of the sufficiency and quality of the data used in the calculation of technical provisions. Where relevant, the Actuarial Function will provide recommendations on internal procedures to improve data quality;
- estimation of Solvency II technical provisions (both claims and premium provisions)
- comparison of best estimates against experience;
- reporting to the Board of Directors on the calculation, reliability and adequacy of technical provisions;

- calculation of the Solvency and Minimum Capital Requirements at the balance sheet date; ensuring results of technical provisions can efficiently feed into solvency capital calculations and Quantitative Reporting Templates (QRTs) on both a quarterly and annual basis; contributing to the effective implementation of the Risk Management System, in particular:
 - i. with regard to risk modelling underlying the calculation of the Solvency and Minimum Capital Requirements; and
 - ii. the application of stress scenarios to the solvency calculations as part of the Company's ORSA process.
- provision of opinions on:
 - Technical provisions
 - Solvency position
 - Underwriting Policy
 - Reinsurance arrangements
 - ORSA

Responsibility

The person in charge of the Actuarial Function shall meet all the following criteria:

- Be a duly qualified actuary;
- Have experience of more than five years in the field of insurance and / or reinsurance.

The Head of Actuarial Function is a pre-approval controlled function ("PCF") under the Central Bank Reform Act 2010 (Sections 20 and 22) Regulations 2011.

The HoAF reports to the Board of Directors and issues a report in writing at least annually documenting all the material tasks that have been undertaken by the Actuarial Function during the reporting period.

In establishing the Company's Actuarial Function, the Board of Directors has ensured that the persons involved have the requisite qualifications and demonstrable experience in the area of non-life reserving and are fully conversant with the Solvency II requirements for the calculation of Technical Provisions.

B.7 Outsourcing

All functions and activities of the Company are eligible to be outsourced provided that specific criteria are satisfied in each instance.

The Board is responsible for the approval and termination of all outsourcing arrangements of critical or important functions or activities. Critical or important functions or activities include key functions relating to the Company's System of Governance and all functions within the Company that are fundamental to carry out its core business. The Board is responsible for ensuring notification to the CBI is made in a timely manner prior to the outsourcing of critical or important functions or activities, and thereafter where there have been material developments in relation to the service provider.

The objectives of NIDAC's Outsourcing Policy are to ensure that the outsourcing of critical or important operational functions or activities does not lead to:

- Reduction in the Board's responsibility for, or influence over, key functions of the Company;
- Material impairment of the quality of the Company's System of Governance;
- Any impairment of the Company's ability to meet its regulatory requirements;

- Non-adherence to the Company's approved policies and procedures;
- Undue increases in operational risk or cost;
- Material impairment of the Company's ability to fulfil its obligations to stakeholders;
- Conflicts of Interest;
- Breach of the Company's data protection obligations.

The Board is responsible for assessing the risks associated with the outsourcing of critical or important functions or activities, carrying out the appropriate due diligence on the outsourced service provider and for reviewing the performance of outsourced service providers against their agreed and documented Service Level Agreements ('SLA').

The management of the Company is coordinated and carried out at its place of business in Ireland. NIDAC engages outsourced service providers to access the expertise and strength and depth of resources necessary to manage the specific requirements of a regulated captive insurance company operating on a global basis.

The following critical or important functions / activities are outsourced:

Critical or important function	Outsourced Service Provider	Jurisdiction
Underwriting Administration	Aon Insurance Managers (Dublin) Limited (AIMD), succeeded by WTW Management (Dublin) Limited on 31 December 2023	Ireland
Claims Administration	AIMD, succeeded by WTW Management (Dublin) Limited on 31 December 2023 – under advisement from Newell Brands Risk Management team	Ireland
Finance and Accounting	Aon Insurance Managers (Dublin) Limited (AIMD), succeeded by WTW Management (Dublin) Limited on 31 December 2023	Ireland
Compliance Function	Aon Insurance Managers (Dublin) Limited (AIMD), succeeded by WTW Management (Dublin) Limited on 31 December 2023	Ireland
Risk Management Function	Aon Insurance Managers (Dublin) Limited (AIMD), succeeded by WTW Management (Dublin) Limited (supporting Chief Risk Officer)	Ireland
Actuarial Reserving	Aon Global Risk Consulting, succeeded by WTW Strategic Risk Consulting on 31 December 2023	Ireland
Actuarial Function	Head of Actuarial Function – Aon Global Risk Consulting, succeeded by WTW Strategic Risk Consulting on 31 December 2023	Ireland
Internal Audit Function	Julia Donegan supported by Aon Commercial Services Ireland Limited, succeeded by Grant Thornton on 31 December 2023	Ireland

B.8 Any other information

The Board is satisfied, based on its assessment of the frameworks which have been established and are in use, that the Company's system of governance is appropriate and adequate for the nature, scale and complexity of the risks inherent in its business operations.

There are no other material items to report in this section.

C. RISK PROFILE

The Risk Appetite Framework adopted by the Board sets out the level of risk that the Company is prepared to accept in the pursuit of its strategic objectives. It sets out:

- the Company's overall philosophy to risk taking and the expectations of shareholders;
- the Company's tolerance to loss of capital, profit volatility and other specified measures; and
- the risk limits that are acceptable in terms of exposures to different types of risk.

The Company's Risk Register combines operational and risk management processes to deliver a descriptive analysis of material risks threatening at least one of the Company's strategic objectives.

The Board's annual ORSA process is based on the company's current and expected risk profile over the business planning period and supports the Board in achieving its strategic objectives by taking a structured and combined approach of strategy, risk management and capital management.

C.1 Underwriting Risk

The principal risks and uncertainties that the Company faces are, by the very nature of the business, those for which it provides or has provided insurance cover. The risk under any insurance contract is the possibility that the insured event occurs and the uncertainty that the Company will have sufficient assets to satisfy the amounts payable under the contract. The Company sought to ensure that it collected sufficient premium income to meet the cost of potential claims over time, but the uncertainty surrounding the severity and frequency of claims can lead to significant variation in the Company's performance in the short term. Whilst considerable judgment is involved, the Directors ensure that suitable processes are in place to ensure the reliability, sufficiency and adequacy of both the statistical and accounting data to be considered in the loss reserve estimation and recording process and to detail the Company's approach to the calculation of technical provisions.

As the Company is a captive insurer, the Company is effectively ensuring the risks of one customer, its parent group, and thus is exposed to risk concentration. However, diversification is achieved through the number of unrelated lines of business, and, the varying geographical locations of the underlying risks. The Company takes all reasonable steps to ensure that it has appropriate information regarding its underwriting exposures. The Company managed these risks through its underwriting strategy of ensuring premiums have been priced in line with market averages along with the setting of appropriate policy and aggregate limits and having adequate reinsurance arrangements in place.

The principal assumptions underlying the Company's estimation of liabilities is that the Company's future claims development will follow a similar pattern to past claims development experience. Additional qualitative judgements are used to assess the extent to which past trends may not apply in the future, for example, isolated large claim occurrences, economic conditions, internal factors such as portfolio mix, policy

conditions and claims handling procedures. Judgement is further used to assess the extent to which external factors, such as judicial decisions and government legislation affect the estimates. The claims reserves have been subject to independent review by a professional actuary. The Company also monitors emerging issues and factors in their potential impact on the Company's claims reserving.

Annual support and certification are provided by the Company's Actuarial Function. The Head of Actuarial Function is required to provide, annually, their opinion on the Company's technical provisions; solvency position, underwriting policy, reinsurance arrangements, and its ORSA.

Sensitivity analysis is also performed for underwriting risks based on 10% movement in the loss reserves and holding all other assumptions constant.

The resultant impact on Gross and Net claims reserves and Profit before Tax ('PBT') for the financial period is shown below:

US\$	Gross TP's For Claims Outstanding	Net TP's For Claims Outstanding	Impact on PBT for the year
Increase in claims provision by 10%	523,552	523,552	(47,596)
Decrease in claims provision by 10%	428,360	428,360	47,596

C.2 Market Risk

The risk of future changes in market prices, which would result in devaluation of investable assets, may result from several factors, including, but not limited to, value, liquidity, duration, composition, interest rates, foreign exchange rates and market fluctuations. The Company diversifies its portfolio to reduce the exposure to market fluctuations and market risk concentrations.

NIDAC has an investment strategy in place in line with its Risk Appetite Framework and the related 'Prudent Person' regulatory requirements. The Company endeavours to:

- prudently invest with consideration of the prevailing financial market environment;
- ensure the Company invests appropriately so as not to result in the Company failing to meet its Solvency Capital Requirements;
- ensure that the Company holds assets of sufficient value and liquidity to meet all liabilities as they become due;
- maximise investment return within the levels of risk as defined by the Company's Risk Appetite;
- ensure compliance with the Liquidity Strategy and Policy;
- ensure compliance with the Asset-Liability Management Strategy and Policy; and
- ensure effective risk management of investments at all times, with due consideration of the risks associated with investments and procedures to monitor, manage and report these risks in a timely manner as part of the Company's overall Risk Management System.

The Company is exposed to currency risk to the extent its assets and liabilities are denominated in a currency different from its functional currency which is US Dollars. The Company seeks to mitigate currency risk by matching the assets and liabilities which arise in different currencies.

The Company is also exposed to concentration risk on the Intercompany loan and assesses the impact on solvency prior to making any increases to the loan.

Interest rate risk arises on the return on the Company's investments including cash and deposits with credit institutions. The sensitivity analysis of net income to fluctuation in interest rate is shown below. The sensitivity analysis below is performed based on a 1% movement in interest income:

US\$	2023	2022
Shift up 100 basis points	83,806	85,842
Shift down 100 basis points	(83,806)	(85,842)

C.3 Credit Risk

Credit risk is the risk that one party to a financial instrument will fail to discharge an obligation and cause the other party to incur a financial loss. The assets that are exposed to credit risks are:

- Cash and cash equivalents
- Investments, deposits with credit institutions, and Intercompany Deposits

The Company utilises custodians deemed to be of high credit quality to hold its cash and cash equivalents and deposits with credit institutions, and additionally has limits in place in relation to the amount of cash which can be held by any one financial institution.

The Company holds an intercompany loan with Newell Brands Ireland Services DAC, a wholly owned subsidiary of Newell Brands Inc. The value of this loan at 31 December 2023 was US\$6,139,277 (2022: US\$6,039,563). Newell Brand Inc.'s credit rating with S&P at the end of the period was BB- (2022: BBB-). Investments and deposits are managed under the Investment strategy (market risk). The Company also recognised the credit risks associated with its reinsurance arrangements. The Company managed its reinsurance risks by establishing a reinsurance strategy and this strategy set out the required security ratings of its reinsurers and the procedures to follow if a financial strength rating of a minimum of A- is not met. There were no outstanding reinsurance balances as at 31 December 2023.

C.4 Liquidity Risk

The Company is exposed if proceeds from financial assets are not sufficient to fund obligations arising from its insurance contracts. The Company can be exposed to daily calls on its available investment assets, principally from insurance claims. Liquidity risk is the risk that an entity will encounter difficulty in raising funds to meet cash commitments associated with financial obligations.

The Company has determined that liquidity risk does not represent a significant exposure to its business. This assessment is based on the fact that the Company has all its investments held either in bank deposits which it can access immediately or within a very short time frame without incurring material costs or penalties or an intercompany loan which is payable on demand and supported by a parental guarantee. Investments are in compliance with the Company's investment guidelines.

C.5 Operational Risk

Operational risk is the risk of loss arising from system failure, human error, fraud, or external events. When controls fail to perform, operational risk can cause damage to reputation, have legal or regulatory

implications, or can lead to financial loss. The Company have a rigorous control framework and monitoring process in place to manage operational risk. Controls include effective segregation of duties, access controls, authorisation and reconciliation procedures, staff education, and assessment processes. Outsourced activities are monitored and managed in the same manner in line with the Outsourcing policy.

The Company cannot expect to eliminate all operational risk, but by initiating a rigorous control framework and by monitoring and responding to potential risks, the Company is able to manage the risk. In addition, NIDAC is subject to Internal and External Audit review.

NIDAC uses expert, industry leading, service providers to provide its outsourced functions which helps avoid any material error or delay. To ensure the quality of the outsourced functions is as high as possible, NIDAC service level agreements in place with outsourced service providers. An annual review of outsourced service providers is also done by the Board.

C.6 Other Material Risk

Strategic Risk

Strategic risk is the risk of loss arising from adverse business decisions, improper implementation of decisions, or lack of responsiveness to industry changes i.e. the risk associated with implementing the wrong strategy or failing to correctly implement the chosen strategy.

The control and monitoring actions/principles underlying the strategic risk management of the Company are:

- Review at least annually the appropriateness of the high-level overall objectives for the Company; the major risks facing the Company; the Risk Appetite for each of these major risks identified. The Board of Directors will ensure continuing appropriateness, at least annually and revisions shall be affected where necessary.
- Ensure the Company Strategy is implemented correctly including approval, review and, monitoring of agreed metrics for the Company.
- Ensure all plans are regularly reviewed to ensure that Risk Tolerances are not exceeded individually or in total. Compare actual versus target performance on a regular basis (as defined for each objective) and produce a variance analysis explaining reasons for deviations.

Variability and Sensitivity Risk

Simplified models based on past experience, along with professional judgement and the inherent randomness in the insurance process, add uncertainty to the projected Best Estimate which are the average of all possible outcomes. The actual amounts required to meet future claim payments may differ from the estimates.

C.7 Any other information

No other material risks have been identified.

D. VALUATION FOR SOLVENCY PURPOSES

D.1 Assets

The recognition and valuation basis are in accordance with Solvency II Directives. NIDAC has prepared its financial statements on a going concern basis as the Directors' have a reasonable expectation that the Company will continue in operational existence for a period of at least 12 months from the date of approval of the financial statements. The financial statements have been prepared in compliance with Irish GAAP issued by the Financial Reporting Council and promulgated for use in Ireland by the Institute of Chartered Accountants Ireland. The Company is also subject to the requirements of the Companies Act 2014 and the European Union (Insurance undertakings: Financial Statements Regulations 2015).

NIDAC uses the historical cost convention. NIDAC has three classes of assets:

- Cash and cash equivalents \$618,756

Cash and cash equivalents comprise cash at banks. Carrying amounts approximate fair value due to the liquid nature of the assets. There are no valuation adjustments for solvency purposes.

- Deposits other than cash equivalents \$1,500,515

This amount represents short term deposits with an original maturity of three months or less and is stated at market value for both solvency and financial statement purposes, the only difference being the inclusion of accrued interest in the above balance. Accrued interest is disclosed as a separate line item in the financial statements.

The Company utilises custodians deemed to be of high credit quality to hold its cash and cash equivalents and deposits other than cash equivalents, and additionally has limits in place in relation to the amount of cash which can be held by any one financial institution.

- Loans and mortgages \$6,139,277

Loans and mortgages comprise Loan to group undertaking. It is stated at market value for both solvency and financial statement purposes, the only difference being the inclusion of accrued interest in the above balance. Accrued interest is disclosed as a separate line item in the financial statements.

D.2 Technical Provisions

The table below shows the gross and net Technical Provisions as at 31 December 2023. Solvency II gross technical provisions (\$'000)

SII Class	Claim Provision	Premium Provision	Best Estimate	Risk Margin	Technical Provisions
Liability	845	-	845	44	890
Property	-	-	-	-	-
Total	845	-	845	44	890

Solvency II net technical provisions (\$'000)

SII Class	Claim Provision	Premium Provision	Best Estimate	Risk Margin	Technical Provisions
Liability	845	-	845	44	916
Property	-	-	-	-	-
Total	845	-	845	44	890

These amounts comply in all material respects with the relevant Solvency II requirements.

The starting point for the calculation of the Solvency II technical provisions is the amounts which have been calculated for the financial statements reserving basis. Within the financial statements, full provision is made for the estimated cost of all claims notified but not settled at the period-end using the best information available at that time. Provision is made for the cost of claims incurred but not reported at the period-end, and potential development on outstanding claims estimates (together regarded as IBNR reserves). In addition, an estimate is made for future claims handling expenses relating to claims outstanding at the period-end.

Provisions are calculated gross of any reinsurance recoveries with a separate estimate being made of amounts recoverable from reinsurers. The Company takes all reasonable steps to ensure that it has appropriate information regarding its claims exposures. In estimating the cost of claims notified but not paid, the Company has regard to claims circumstances as reported, any information available from loss adjusters and information on the cost of settling claims with similar characteristics in previous periods. IBNR provisions are established having regard for the results of a valuation on a best-estimate basis by an independent actuary together with a margin for uncertainty which has been determined by management.

Best Estimate of Unpaid Claim Liabilities (Financial Statements)

The overall methodology for estimating NIDAC's unpaid claim liabilities is based upon a combination of several actuarial valuation methods that, based on the Actuary's opinion, are believed to accurately reflect the reserve requirement for the individual policy year and line of business:

The Chain Ladder ("CL") method: estimates the ratio by which cumulative claims to date will increase (or decrease) at annual intervals from the date of policy inception. The 12 to 24-month ratio (for example) is estimated by taking the average ratio observed in policies 24 months or more from the

date of inception. This approach assumes the earliest year of origin to experience no future movement. Claims experience is not adjusted for past inflation.

The Incurred Bornhuetter-Ferguson Method ("IBF"): a blended method of claims development where estimates of ultimate claims derived using a loss development (or Chain Ladder) method is blended with the estimates derived using alternative methods. It is often blended with estimates using the IELR method. A blended approach is preferred for recent, less-developed policy periods because using the chain ladder method in isolation can be particularly unstable. In addition, the use of a blended approach helps provide a smooth and consistent transition from past policy periods to partially complete and future periods.

The Head of Actuarial Function estimates ground-up gross ultimates (the sum of paid claims, case estimates, cost of claims function related overhead costs ("ULAE") and IBNR by policy year), allocating an IBNR and ULAE for each line of business and policy year for future claim development.

Solvency II requires undertakings to hold technical provisions which correspond to the amount they would have to pay to transfer their (re)insurance obligations immediately to another undertaking. This value comprises a **best estimate** and a **risk margin**, intended to represent a market consistent valuation. The technical provisions take account of the time value of money by discounting using a risk-free interest rate term structure as at the valuation date. There is no allowance for prudence in the calculation of best estimates.

The best estimate is calculated by considering all future cash inflows and outflows required to settle the existing (re)insurance obligations over their lifetime. It represents the mean outcome of all possible scenarios, taking account of how likely they are to occur and their potential variability. In this regard, the best estimate is a probability-weighted average of future cash flows, allowing for the time value of money.

The Solvency II best estimate is calculated gross with any recoverables calculated separately following the same methodology. The best estimate is made up of a claims provision and a premium provision, relating to past and future exposures respectively. An allowance has been made for reinsurer counterparty default. Claims payments in the claim and premium provisions have been projected at annual intervals using annual paid development patterns.

The Solvency II claims provision is equivalent to the expected net present value of the best estimate claims reserve, with additional allowances to allow for all possible outcomes through the inclusion of provisions for Events Not in Data ("ENID") and the future expenses that will be incurred in servicing the existing reinsurance obligations. The claims provision also includes all unpaid premium relating to earned exposures that are within payment terms.

Under the Solvency II contract boundary definition, any policies which have been bound, even if unaccepted, as at the valuation date, must be considered in the premium provision. The Solvency II premium provision is therefore equivalent to the expected net present value of the following cash inflows and outflows, relating to unearned exposure from accepted contracts and exposure from unaccepted contracts bound as at the valuation date:

- Cash flows from future premiums in relation to future claims;
- Cash flows arising from future claim events (e.g. claims payments);

- Cash flows arising from loss adjustment expenses in respect of claims events occurring after the valuation date;
- Cash flows arising from the ongoing administration of policies in-force as at the valuation date;
- Cash flows arising from salvage and subrogation.

The Company ceased writing business in September 2018 and is no longer exposed to prospective premium risk. NIDAC has established effective controls to ensure no future premium is written.

Estimates are “best estimates” in the sense that they are intended to be a probability-weighted average of all possible outcomes. The Company has employed techniques and assumptions that are appropriate for the purpose of calculating its Solvency II technical provisions. The actual amounts required to meet future claim payments may differ from estimates for several reasons, such as model specification error, parameter error and random error due to the inherent uncertainty in insurance. External environment risk factors may cause material deviations in estimates of technical provisions, including changes in interest rates, inflation and currency exchange rate fluctuations.

The Solvency II risk margin is intended to represent an amount that the Company would be required to pay, in excess of the best estimate of the liabilities, for a third party to assume the risk of running of the existing liabilities. The actuarial calculation of the risk margin is consistent with the Solvency II regulations, applying a 6% cost of capital to the amount of capital required at the beginning of each year to support the run-off of the insurance obligations. These future costs of capital are then discounted to the valuation date and summed to calculate the amount of risk margin required.

The resultant differences between the value of technical provisions for solvency purposes and the financial statements at 31 December 2023 are shown below.

Source of change in reserves	\$'000	Reserves after change
Net Booked reserve	476	
Adjustment to best estimate	(107)	369
SII Expenses	498	867
Allowance for ENIDs	50	917
Counterparty default	0	917
Discounting	(72)	845
Risk Margin	44	889
Solvency II Net Technical Provisions		889

Information on how the Company manages risk in the area of underwriting and reserving is set out in Section C1 above. Operational risks relating to the Company’s technical provisions and claims data are managed using the Control Framework described in Section B4 above.

The Company is satisfied that it has access to sufficient historical claims data on an annual basis for the calculation of its technical provisions and that this data is accurate and appropriate for the Company’s needs. Claims management processes by the Company are appropriate and adequate given the nature of the underlying risks. Significant reporting delays are not experienced.

In calculating its technical provisions on a Solvency II basis, the Company has not applied any of the following items:

- matching adjustment referred to in Article 77b of Directive 2009/138/EC;
- volatility adjustment referred to in Article 77d of Directive 2009/138/EC;
- transitional risk-free interest rate-term structure referred to Article 308c of Directive 2009/138/EC;
- and
- transitional deduction referred to in Article 308d of Directive 2009/138/EC.

D.3 Any Other Liabilities

Aside from Technical provisions, the valuation of which is detailed above, NIDAC has other classes of liabilities:

- Any other liabilities \$117,453

Any other liabilities include Accrued Expenses from the financial statements. Under the Solvency II valuation basis, the future cashflow was discounted to derive a market value.

D.4 Alternative Methods of Valuation

No alternative methods were used.

D.5 Any Other Information

There is no other information to report.

E. CAPITAL MANAGEMENT

E.1 Own Funds

The Company has put in place a Capital Management Policy to ensure that 'Own Fund' items, both at issue and subsequently, meet the requirements of the Solvency II capital regime. The objectives of the policy are to ensure that on an on-going basis the Company has:

- own fund items available to meet its capital requirements; and
- developed processes to ensure the appropriateness of its own fund items.

The Solvency II Directive and the Delegated Acts identify the criteria own funds items must possess to be classified in one of the three Tiers (Tier 1, Tier 2 and Tier 3) of eligible capital. The Delegated Acts provide lists of items that fall into each of the three Tiers. Management reviews capital on an ongoing basis with a view to maintaining a level of capital sufficient to cover significant balance sheet risks and regulatory requirements. As at 31 December 2023, the Company has adequate capital to meet these objectives.

The Company assesses material risks that may threaten the accomplishment of the Company's strategic objectives or might have a substantial impact on the available qualifying own funds; these risks could result from either internal or external events. Management has identified Reserve Risk and Investment Risk as the material risks to which NIDAC is exposed. Management has investigated the magnitude of each of these risks as well as sought to determine any potential correlations that may exist within, or between, these risk categories based on review of historical experience.

In relation to Investment Risk, a clear strategy has been developed to manage risk in a manner which limits exposure to investment volatility for those assets matching insured liabilities. All other risks are managed through a framework of internal controls supported by monitoring by management, internal audit, governance groups and the various functions of the board.

Own fund items at the end of reporting period and the prior year comparative period are as follows:

US\$'000s	2023	2022
Allotted, called-up and fully paid (1,400,001 ordinary shares of US\$1 each)	1,400	1,400
Reconciliation Reserve	5,904	5,786
Total basic own funds	7,304	7,186

The reconciliation reserve was derived after deducting US\$80k (2022: US\$300k) from the Company's net assets. The deduction relates adjustment for restricted own funds in respect of ring-fenced funds.

The movement in basic own funds during the reporting period reflects the profitability of the Company as adjusted for the valuation of net technical provisions on a market consistent fair value basis under Solvency II. The reconciliation reserve represents the Company's retained profits as adjusted for Solvency II valuation principals. The adjustments which arise in the application of these principles are shown in the equity reconciliation below.

Any change to the share capital requires the approval of the Shareholder and the Board. Retained earnings are adjusted on a quarterly basis to take account of the profits/losses earned in the period together with any Solvency II valuation adjustments.

The payment of dividends is considered on an annual basis by the Board as part of its medium-term capital assessment. Potential dividends will be considered as part of the Company's ORSA process to ensure that the Company will continue to meet its solvency needs over the business planning period. There were no payments of dividends during the reporting period.

Solvency II own funds

Under Solvency II valuation principals, the eligible own funds available to meet the SCR and MCR is US\$7.22m (2022: US\$7.19m). This is comprised solely of Tier 1 capital.

NIDAC has no material ancillary own funds.

Capital management

The total capital of the Company as at 31 December 2023 consists of shareholder's equity of US\$7.72m (2022: US\$7.48m).

Management reviews capital on an ongoing basis with a view to maintaining a level of capital sufficient to cover significant statement of financial position risks and regulatory requirements. As at 31 December 2023 the Company has adequate capital to meet these objectives.

E.2 Solvency Capital Requirement & Minimum Capital Requirement

At the end of the reporting period, NIDAC's SCR and MCR have been calculated as US\$4.548m and US\$4.420m respectively. NIDAC's Solvency II recognized own funds totaling US\$7.224m are sufficient to meet the SCR and results in a Solvency Ratio of 159%.

Following is a reconciliation of NIDAC's balance sheet equity as of 31 December 2023 totaling US\$7.72m and the Solvency II balance sheet equity.

US\$'000s	2023
Equity per the Company's financial statements	7,718
Adjustments to technical provisions and other liabilities	(414)
Adjustment to other liabilities	-
Adjustment for ring fenced funds	(80)
Own funds (Excess of assets over liabilities for solvency purposes)	7,224

Adjustments are made to technical provisions in line with the valuation methodologies set out in section D.2 above. These adjustments are reflected in the Company's reconciliation reserve.

The SCR has been calculated using the standard formula and without the application of any undertaking specific parameters. The split of SCR by risk modules is shown below, together with the prior year comparative:

Risk Charge US\$'000s	31 Dec 2023	31 Dec 2022	Movement
Non-Life Underwriting Risk	279	282	(3)
Counterparty Default Risk	41	59	(18)
Market Risk	4,433	4,358	75
Operational Risk	25	26	(1)
Diversification Benefit	(231)	(245)	14
SCR	4,548	4,480	68
MCR	4,420	4,266	154
Available Capital	7,224	7,186	118
Surplus/(Deficit)	2,676	2,707	49
Solvency Ratio	159%	160%	1%

NIDAC ceased writing business in September 2018 and so is not exposed to prospective premium risk. NIDAC's SCR of US\$ 4.548m is above its MCR of US\$4.420m.

The MCR is calculated through a prescribed formula based on the net technical provisions (excluding the risk margin) and net written premium. It is also constrained to be between 25% and 45% of the SCR. Further to this, SI 485 sets out absolute minimum MCR values for non-life and life insurers, reinsurers and captives. In the case of NIDAC, as a non-life captive insurer writing liability business, this absolute floor is EUR 4,000,000.

Data

Estimates are based on:

- Information contained in NIDAC's 31 December 2023 financial statements
- Actuarial estimates of NIDAC's unpaid claim liabilities as at 31 December 2023.

Methodology

The actuarial calculation of NIDAC's Solvency Capital Requirement is based on application of the Solvency II regulations as detailed in the Commission Delegated Regulation (EU) 2015/35 as published on October 10, 2014 ("Delegated Acts").

E.3 Use of Duration Based Equity Risk Sub Model in calculation of the SCR

There was no use of duration-based equity risk sub model in the calculation of the SCR.

E.4 Differences between the Standard Model & Any Internal Model

NIDAC used the Standard Model in determining the SCR and MCR and did not rely on any internal model.

E.5 Any non-compliance with MCR and SCR

There are no issues with non-compliance with the MCR and SCR.

E.6 Any Other Information

There is no other information to report.

E.7 Additional Voluntary Information

There is no additional voluntary information to report.

Note: Tables within this report contain minor rounding differences in certain instances due to amounts being displayed as whole numbers or in thousands while the source workings underlying the annual reporting templates are calculated to two decimal places. These differences are immaterial.

APPENDICES

The following audited quantitative data has been added to Appendix 1:

S.02.01.02 – Balance sheet.

S.17.01.02 – Non-Life technical provisions

S.19.01.21 – Claims Developments S23.01.01 – Own Funds

S25.01.21 – SCR using standard formula S28.01.01 – MCR

The following forms which are not in scope for audit are included in Appendix 2:

S04.05.21 – Premiums, Claims & Expenses by country

S05.01.02 – Premium, Claims & Expenses by line of business

Newell Insurance DAC

Solvency and Financial Condition Report

Disclosures

31 December

2023

(Monetary amounts in USD thousands)

General information

Undertaking name	Newell Insurance DAC
Undertaking identification code	635400EMOPCKZRM33D49
Type of code of undertaking	LEI
Type of undertaking	Non-Life insurance undertakings
Country of authorisation	IE
Language of reporting	en
Reporting reference date	31 December 2023
Currency used for reporting	USD
Accounting standards	Local GAAP
Method of Calculation of the SCR	Standard formula
Matching adjustment	No use of matching adjustment
Volatility adjustment	No use of volatility adjustment
Transitional measure on the risk-free interest rate	No use of transitional measure on the risk-free interest rate
Transitional measure on technical provisions	No use of transitional measure on technical provisions

List of reported templates

- S.02.01.02 - Balance sheet
- S.04.05.21 - Premiums, claims and expenses by country: Non-life insurance and reinsurance obligations
- S.05.01.02 - Premiums, claims and expenses by line of business: Non-life insurance and reinsurance obligations
- S.17.01.02 - Non-Life Technical Provisions
- S.19.01.21 - Non-Life insurance claims
- S.23.01.01 - Own Funds
- S.25.01.21 - Solvency Capital Requirement - for undertakings on Standard Formula
- S.28.01.01 - Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity

S.02.01.02

Balance sheet

		Solvency II value
Assets		C0010
R0030	Intangible assets	0
R0040	Deferred tax assets	0
R0050	Pension benefit surplus	0
R0060	Property, plant & equipment held for own use	0
R0070	Investments (other than assets held for index-linked and unit-linked contracts)	1,501
R0080	<i>Property (other than for own use)</i>	0
R0090	<i>Holdings in related undertakings, including participations</i>	0
R0100	<i>Equities</i>	0
R0110	<i>Equities - listed</i>	0
R0120	<i>Equities - unlisted</i>	0
R0130	<i>Bonds</i>	0
R0140	<i>Government Bonds</i>	0
R0150	<i>Corporate Bonds</i>	0
R0160	<i>Structured notes</i>	0
R0170	<i>Collateralised securities</i>	0
R0180	<i>Collective Investments Undertakings</i>	
R0190	<i>Derivatives</i>	0
R0200	<i>Deposits other than cash equivalents</i>	1,501
R0210	<i>Other investments</i>	0
R0220	Assets held for index-linked and unit-linked contracts	
R0230	Loans and mortgages	6,139
R0240	<i>Loans on policies</i>	0
R0250	<i>Loans and mortgages to individuals</i>	0
R0260	<i>Other loans and mortgages</i>	6,139
R0270	Reinsurance recoverables from:	0
R0280	<i>Non-life and health similar to non-life</i>	0
R0290	<i>Non-life excluding health</i>	0
R0300	<i>Health similar to non-life</i>	0
R0310	<i>Life and health similar to life, excluding index-linked and unit-linked</i>	0
R0320	<i>Health similar to life</i>	
R0330	<i>Life excluding health and index-linked and unit-linked</i>	
R0340	<i>Life index-linked and unit-linked</i>	
R0350	Deposits to cedants	0
R0360	Insurance and intermediaries receivables	0
R0370	Reinsurance receivables	0
R0380	Receivables (trade, not insurance)	0
R0390	Own shares (held directly)	0
R0400	Amounts due in respect of own fund items or initial fund called up but not yet paid in	0
R0410	Cash and cash equivalents	619
R0420	Any other assets, not elsewhere shown	53
R0500	Total assets	8,312

S.02.01.02

Balance sheet

		Solvency II value
		C0010
Liabilities		
R0510	Technical provisions - non-life	890
R0520	<i>Technical provisions - non-life (excluding health)</i>	890
R0530	<i>TP calculated as a whole</i>	0
R0540	<i>Best Estimate</i>	845
R0550	<i>Risk margin</i>	44
R0560	<i>Technical provisions - health (similar to non-life)</i>	0
R0570	<i>TP calculated as a whole</i>	0
R0580	<i>Best Estimate</i>	0
R0590	<i>Risk margin</i>	0
R0600	Technical provisions - life (excluding index-linked and unit-linked)	0
R0610	<i>Technical provisions - health (similar to life)</i>	0
R0620	<i>TP calculated as a whole</i>	
R0630	<i>Best Estimate</i>	
R0640	<i>Risk margin</i>	
R0650	<i>Technical provisions - life (excluding health and index-linked and unit-linked)</i>	0
R0660	<i>TP calculated as a whole</i>	
R0670	<i>Best Estimate</i>	
R0680	<i>Risk margin</i>	
R0690	Technical provisions - index-linked and unit-linked	0
R0700	<i>TP calculated as a whole</i>	
R0710	<i>Best Estimate</i>	
R0720	<i>Risk margin</i>	
R0740	Contingent liabilities	
R0750	Provisions other than technical provisions	0
R0760	Pension benefit obligations	0
R0770	Deposits from reinsurers	0
R0780	Deferred tax liabilities	0
R0790	Derivatives	0
R0800	Debts owed to credit institutions	0
R0810	Financial liabilities other than debts owed to credit institutions	0
R0820	Insurance & intermediaries payables	0
R0830	Reinsurance payables	0
R0840	Payables (trade, not insurance)	0
R0850	Subordinated liabilities	0
R0860	<i>Subordinated liabilities not in BOF</i>	0
R0870	<i>Subordinated liabilities in BOF</i>	0
R0880	Any other liabilities, not elsewhere shown	117
R0900	Total liabilities	1,007
R1000	Excess of assets over liabilities	7,304

S.04.05.21

Premiums, claims and expenses by country: Non-life insurance and reinsurance obligations

R0010

S.05.01.02
Premiums, claims and expenses by line of business: Non-life insurance and reinsurance obligations

Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)												Line of business for: accepted non-proportional reinsurance				Total
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	Misc. financial loss	Health	Casualty	Marine, aviation and transport	Property	
C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0200
Premiums written																
R0110	Gross - Direct Business															0
R0120	Gross - Proportional reinsurance accepted															0
R0130	Gross - Non-proportional reinsurance accepted															0
R0140	Reinsurers' share															0
R0200	Net															0
Premiums earned																
R0210	Gross - Direct Business															0
R0220	Gross - Proportional reinsurance accepted															0
R0230	Gross - Non-proportional reinsurance accepted															0
R0240	Reinsurers' share															0
R0300	Net															0
Claims incurred																
R0310	Gross - Direct Business															313
R0320	Gross - Proportional reinsurance accepted															0
R0330	Gross - Non-proportional reinsurance accepted															0
R0340	Reinsurers' share															0
R0400	Net															313
R0550	Expenses incurred															0
R1210	Balance - other technical expenses/income															
R1300	Total technical expenses															0

Non-Life insurance claims

Accident year / underwriting year

Underwriting Year

(absolute amount)

R0100
R0160
R0170
R0180
R0190
R0200
R0210
R0220
R0230
R0240
R0250
R0260

(absolute amount)

R0100
R0160
R0170
R0180
R0190
R0200
R0210
R0220
R0230
R0240
R0250
R0260

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

R0010	MCR _{NL} Result	87
-------	--------------------------	----

Net (of reinsurance /SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
--	---

C0020C0030

R0020	Medical expense insurance and proportional reinsurance	0	0
R0030	Income protection insurance and proportional reinsurance	0	0
R0040	Workers' compensation insurance and proportional reinsurance	0	0
R0050	Motor vehicle liability insurance and proportional reinsurance	0	0
R0060	Other motor insurance and proportional reinsurance	0	0
R0070	Marine, aviation and transport insurance and proportional reinsurance	0	0
R0080	Fire and other damage to property insurance and proportional reinsurance	0	0
R0090	General liability insurance and proportional reinsurance	845	0
R0100	Credit and suretyship insurance and proportional reinsurance	0	0
R0110	Legal expenses insurance and proportional reinsurance	0	0
R0120	Assistance and proportional reinsurance	0	0
R0130	Miscellaneous financial loss insurance and proportional reinsurance	0	0
R0140	Non-proportional health reinsurance	0	0
R0150	Non-proportional casualty reinsurance	0	0
R0160	Non-proportional marine, aviation and transport reinsurance	0	0
R0170	Non-proportional property reinsurance	0	0

Linear formula component for life insurance and reinsurance obligations

C0040

R0200	MCR _L Result	0
-------	-------------------------	---

Net (of reinsurance /SPV) best estimate and TP calculated as a whole	Net (of reinsurance /SPV) total capital at risk
--	---

C0050C0060

R0210	Obligations with profit participation - guaranteed benefits		
R0220	Obligations with profit participation - future discretionary benefits		
R0230	Index-linked and unit-linked insurance obligations		
R0240	Other life (re)insurance and health (re)insurance obligations		
R0250	Total capital at risk for all life (re)insurance obligations		

Overall MCR calculation

C0070

R0300	Linear MCR	87
R0310	SCR	4,548
R0320	MCR cap	2,047
R0330	MCR floor	1,137
R0340	Combined MCR	1,137
R0350	Absolute floor of the MCR	4,420
R0400	Minimum Capital Requirement	4,420