



# Solvency & Financial Condition Report YE2024

AXA Insurance dac

# Customer First at AXA

At AXA we aim to be here for you, how, when and where you need us, be it to meet your insurance needs for motor, home, farm, small business insurance and International Private Medical Insurance or when you need us following an accident or loss.

We have a long history in Ireland and have insured customers here for over three hundred years. Today we have over 1650 staff at locations throughout Ireland to support our customers.

Through our claims, motor breakdown, emergency home assistance and International Private Medical Insurance emergency service all operating 24 hours a day, our wide approved repairer network, the largest Insurance branch network in Ireland, by phone, post, email or online we aim to be there for you how, when and where you need us.

Our contact information is below, our claims, motor rescue and emergency home assistance helplines are available 24 hours a day.

## **Republic of Ireland**

AXA Claims 24 Hour Helpline  
Policy support and quotations  
Roadside Assistance & Car and Key Rescue  
AXA Emergency Home Assistance

## **www.axa.ie**

0818 7 365 24 or 00 353 1 8729 888  
or through your broker  
0818 7 365 24 or 00 353 1 8729 888  
0818 253 347

## **Northern Ireland**

AXA Claims 24 Hour Helpline  
AXA - emergency home assistance  
Roadside Assistance & Car and Key Rescue  
Policy support and quotations

## **www.axani.co.uk**

0345 8 28 28 23  
0345 3 99 53 35  
0345 828 2823 or 0035318583200  
0345 8 28 28 20 or 03458282822  
or through your broker

## **International Private Medical Insurance\***

Direct Customer New Business:  
24-hour emergency numbers

## **www.axaglobalhealthcare.com**

+44 (0) 1892556004  
Claims - +44 (0) 1892503856  
Assistance - +44 (0) 1892513999  
Medical help - +44 (0) 1892556753

## **Laya Healthcare**

Customer Care or Sales  
Emergency Overseas

## **www.layahealthcare.ie**

021 202 2000  
+353 21 422 2204

At AXA we want to treat you fairly, our branch and claims staff will be happy to assist you but if we cannot our customer care department would be happy to hear from you;

- by email to [axacustomer@axa.ie](mailto:axacustomer@axa.ie)
- by phone to 0818 505 505 or in Northern Ireland 0800 039 1970
- by post to; AXA Insurance, Customer Care Department, Freepost, Dublin 1 or AXA Insurance, Freepost BEL 2531, Belfast BTI 1BR

Further information on making sure you are being treated fairly by us and what to do if you are unhappy with how we deal with your complaint is available on our website, in your policy document and from any AXA staff member or Branch.

Thank you for choosing AXA to be your partner for Insurance.

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Presentation of the information. *In this Report unless stated otherwise,*

- (i) the "Company", "AXA" refer to AXA Insurance dac,
- (ii) "AXA SA", AXA Group is the publicly traded parent Company of the AXA Group and refers to a société anonyme organised under the laws of France
- (iii) \*AXA global Healthcare International Private Medical Insurance underwritten by AXA Insurance dac

# Summary

AXA's contributions to more inclusive  
and stronger societies



## 01 Road Safe Road Show

A well-established programme that seeks to provide teenage children with an insight into the dangers and possible repercussions of dangerous driving.

- A.1** Business
- A.2** Underwriting Performance
- A.3** Investment Performance
- A.4** Performance of other activities
- A.5** Any other information

# Solvency & Financial Condition Report 2024

This report is the Solvency and Financial Condition Report (SFCR) of AXA Insurance dac for the reporting period ended December 31, 2024, pursuant to Commission Delegated Regulation (EU) 2019/981 of 8 March 2019 amending Delegated Regulation (EU) 2015/35 supplementing Directive 2009/138/EC of the European Parliament and of the Council on the taking-up and pursuit of the business of Insurance and Reinsurance (Solvency II) and is approved by the Board of AXA Insurance dac.

## Summary

The European Union developed a regulatory regime for European insurers which became effective on January 1, 2016, following the adoption of the 2009 Solvency II Directive on the taking-up and pursuit of the business of insurance and reinsurance, as amended in 2014 by the 2014/51/EU Directive (“Omnibus II”). The regime is designed to implement solvency requirements that better reflect the risks that insurance companies face and deliver a supervisory system that is consistent across all European member States. The Solvency II framework is based on three pillars: (1) Pillar 1 consists of the quantitative requirements around own funds, valuation rules for assets and liabilities and capital requirements, (2) Pillar 2 sets out qualitative requirements for the governance and Risk Management of insurers, as well as for the effective supervision of insurers including the requirement for insurers to submit an Own Risk and Solvency Assessment (ORSA) which will be used by the regulator as part of the supervisory review process; and (3) Pillar 3 focuses on enhanced reporting and disclosure requirements. The Solvency II framework covers, among other matters, valuation of assets and liabilities, the treatment of insurance groups, the definition of capital and the overall level of required capital.

AXA Insurance dac Property & Casualty insurance operations offer a broad range of products including motor, household, property, general liability and health for both Personal & Commercial customers. In addition, AXA Insurance dac provides International Private Medical Insurance for European customers.

### / Key Figures - IFRS (statutory account basis)

	2024	2023
	€ Million	€ Million
<b>Statement of Profit or Loss Data</b>		
Insurance revenues	1151	1065
Insurance service result	17	28
Net investment income (including other finance income/expense)	133	75
Other, including Tax	-22	(8)
Profit for the year	128	94
<b>Statement of Financial Position Data</b>		
Total assets	3,039	2,693
<b>SII Available Capital after Foreseeable Dividends</b>	<b>683</b>	<b>594</b>
<b>Capital Requirement Data</b>		
Solvency Capital Requirement (SCR)	467	401
<b>Solvency II Ratio after foreseeable dividends</b>	<b>146%</b>	<b>148%</b>

## / Key Highlights

<p style="text-align: center;"><b>ACTIVITY INDICATORS</b></p>	<p>AXA Insurance dac has delivered a strong performance in 2024 achieving growth in both Insurance Revenue and Profit for the year. Importantly, during the year necessary pricing action was taken in direct response to the increase in motor accident numbers, coupled with increased cost of injury claims incurred.</p> <p>Price adjustments were made in order to offset a potential underwriting loss driven by the inflationary pressures in the cost of claims.</p> <p>Insurance revenues grew by 8% during the year driven by premium increases, most notably on the Personal Lines portfolio across both Motor and Household lines of business. During the year all action possible was taken to minimise the impact of necessary price increases on customers, customer numbers fell during the year. In addition, there was growth in certain Commercial Motor classes contributing to overall growth during the year.</p> <p>Profit for the year of €128.3m (2023: €94.5m) reflects strong investment performance of €84.3m (2023: €73.4m) coupled with Insurance service result €65.2m (2023: €46.1m) offset by Tax.</p> <p>For the year the Company has continued to maintain a balanced, diversified and risk appropriate investment strategy, which has resulted in increased Net investment income reflecting a continuation of strong interest rates.</p>
<p style="text-align: center;"><b>CAPITAL MANAGEMENT</b></p>	<p>Main transactions during the reporting year:</p> <p>No dividend is proposed in relation to the accounting year 2024 due to the capital requirements linked to health underwriting for 2025 and beyond. The company is focusing on reinvesting its financial resources to strengthen its capital base to support growth in its Health business.</p>
<p style="text-align: center;"><b>SYSTEM OF GOVERNANCE</b></p>	<p>The Company satisfies the requirements specified in the Central Bank of Ireland’s Corporate Governance Requirements for Insurance Undertakings 2015 for a ‘<i>High Impact designated institution</i>’ through delegation to the following committees:</p> <ol style="list-style-type: none"> <li>i. AXA Insurance dac Audit &amp; Compliance Committee</li> <li>ii. AXA Insurance dac Risk Committee</li> <li>iii. AXA Insurance dac Investment &amp; ALM Committee</li> <li>iv. AXA Insurance dac Nomination Committee</li> <li>v. AXA Insurance dac Remuneration Committee</li> </ol> <p>In order to preserve a well-balanced governance framework, the Board of Directors ensures that Independent Non-executive Directors have a major role in all Board Committees.</p> <p>The AXA Group is engaged in the financial protection and wealth management business on a global scale. As such, it is exposed to a very wide variety of risks – insurance risks, health risks, financial market risks and other types of risks.</p> <p>As an integrated part of all business processes, Group Risk Management is responsible for the definition and the deployment of the Enterprise Risk Management (ERM) framework within AXA Group. This framework is based on the four following pillars, cemented by a strong risk culture:</p> <ul style="list-style-type: none"> <li>– Risk Management independence and comprehensiveness: Chief Risk Officers are independent from operations (“first line of defence”) and Internal Audit Departments (“third line of defence”). The Risk Management Department, together with Legal, Compliance, Internal Financial Control, Human Resources and Security Departments constitute the “second line of defence” whose objective is to develop, coordinate and monitor a consistent risk framework across the Group.</li> </ul>

- Shared risk appetite framework,
- Systematic second opinion on key processes, and
- Robust economic capital model.

In order to manage these risks, AXA Insurance dac has put in place a comprehensive system of internal controls designed to ensure that executives are informed of significant risks on a timely and continuous basis, and they have the necessary information and tools to appropriately analyse and manage these risks.

These mechanisms and procedures principally include:

- local corporate governance structures designed to ensure appropriate supervision and management of our business as well as clear allocation of roles and responsibilities;
- management structures and control mechanisms designed to ensure that local management have a clear view of the principal risks faced and the tools necessary to analyse and manage these risks;
- Local Internal Control Over Financial Reporting (ICOFR), designed to ensure the accuracy, completeness and timeliness of consolidated financial statements; and
- disclosure controls and procedures designed to ensure that local executives have the necessary information to make fully informed disclosure decisions on a timely basis and that the Company's disclosures on material information (both financial and non-financial) are timely, accurate and complete.

The Consumer Protection Code, as applicable to insurance undertakings, put in place by the Central Bank of Ireland and the Insurance Conduct of Business rules put in place by the Financial Conduct Authority for Northern Ireland also form an important element of the organisation's system of governance as do the Central Bank of Ireland's Corporate Governance Requirements for Insurance Undertakings 2015.

For Health Insurance in Ireland AXA Insurance dac is regulated by the Health Insurance Authority and the Central Bank of Ireland.

These mechanisms and procedures, taken together, constitute a comprehensive control environment that the Board and Executive Management believe is appropriate and well adapted to the business of AXA Insurance dac.

**RISK PROFILE**

The AXA economic capital model (AXA Internal Model) offers a concrete and powerful tool to control and measure exposure to most risks, in line with the Solvency II framework. In addition, dedicated local Operational Risk and Compliance functions support management of Operational and Compliance Risk.

In presenting the risks set forth below, management has prioritised categories of risks in a manner that corresponds to management's current view as to the potential impact of the risk for AXA Insurance dac.

**Risks relating to the scope and nature of our business, the products we offer and our operations**

Insurance risks for Property & Casualty business are covered through four major processes, defined at Group level but performed jointly by central and local teams:

- risk controls on new products complementing underwriting rules and product profitability analyses;
- optimising of reinsurance strategies in order to cap local and Group peak exposures thereby protecting its solvency by reducing volatility and to mitigate risk within the Group to benefit from diversification;
- reviewing technical reserves including recent claims trends for AXA Insurance dac;
- monitoring emerging risks to share expertise within the underwriting and risk communities.

**Risks relating to the financial markets and financial position**

AXA is exposed to financial market risks through its core business of financial protection i.e., insurance and the investment of reserves associated with insurance.

A wide variety of Risk Management techniques are used to control and mitigate the market risks to which the AXA Group's operating units and the Group itself are exposed. These techniques include Asset & Liability Management (ALM), disciplined investment process, hedging strategies and regular monitoring of the financial risks on the economic and solvency position.

The main financial risks for AXA Insurance dac are as follows:

- interest-rate spread risk and equity risk related to the operating activities;
- credit risk;
- liquidity risk.

These risks are assessed for all exposures on the balance sheet including the defined benefit pension scheme.

There are risks relating to the evolving regulatory and competitive environment in which we operate.

In addition to risks that bear a capital charge through Solvency Capital Requirement (SCR) calculation, AXA Insurance dac also considers liquidity risk, reputation risk, strategic risk, regulatory risk, Group risk as well as emerging threats and impact of transversal adverse scenarios.

<b>VALUATION</b>	<p>AXA Insurance dac Solvency II balance sheet is prepared as of December 31<sup>st</sup>. The balance sheet is prepared in compliance with the Solvency II Regulation.</p> <p>Assets and liabilities are valued based on the assumption that the Company will pursue its business as a going concern.</p> <p>Technical provisions are recognised with respect to all insurance and reinsurance obligations towards policyholders and beneficiaries of insurance or reinsurance contracts. The value of technical provisions corresponds to the current amount that the Company would have to pay if it was to transfer its insurance and reinsurance obligations immediately to another insurance or reinsurance undertaking.</p> <p>Other assets and liabilities are recognised in compliance with IFRS standards and interpretations of the IFRS Interpretations Committee that are endorsed by the European Union before the balance sheet date, provided that those standards and interpretations include valuation methods that are in accordance with the following market consistent valuation approach set out in Article 75 of the Solvency II Directive 2009/138/EC:</p> <ul style="list-style-type: none"> <li>- Assets shall be valued at the amount for which they could be exchanged between knowledgeable willing parties in an arm's length transaction;</li> <li>- Liabilities shall be valued at the amount for which they could be transferred, or settled, between knowledgeable willing parties in an arm's length transaction (without adjustment to take account of the Company's own credit standing).</li> </ul>
<b>SOLVENCY</b>	<p>Solvency ratio of 146% is 2pts behind prior year (148%). Eligible own funds (EOF) of €683m compared to €594m at, 31 December 2024.</p>

## A.1 Business

### / General information

AXA Insurance dac is established in the Republic of Ireland and a member of the AXA Insurance PLC (UK) group of Companies. The Company is a Property and Casualty Insurer and operates across the island of Ireland and in the EU for International Private Medical Insurance

### / Information on the Company

The Company is established under the laws of Ireland as a Designated Activity Company (dac). The Company's registered office is at Wolfe Tone House, Wolfe Tone Street, Dublin and its telephone number is 0818 7 365 24. (00 353 1 858 3200). AXA was established in Ireland in 2000 with its origins in Ireland going back over 300 years to 1721.



#### Supervisory authority

AXA Insurance dac is regulated by the Central Bank of Ireland. For business in Northern Ireland, AXA Insurance dac is authorised and regulated by the Central Bank of Ireland, deemed authorised by the Prudential Regulation Authority and subject to regulation by the Financial Conduct Authority and limited regulation by the Prudential Regulation Authority.

Central Bank of Ireland / Banc Ceannais na hÉireann  
New Wapping Street, North Wall Quay, Dublin 1, D01 F7X3

Financial Conduct Authority  
12 Endeavour Square, London, E20 1JN

Prudential Regulation Authority  
Prudential Regulation Authority, Bank of England, Threadneedle St, London, EC2R 8AH

For Health Insurance in Ireland;  
Health Insurance Authority  
Beaux Lane House, Mercer Street Lower, Dublin 2, D02 DH60

AXA Group is engaged in regulated business activities on a global basis through numerous operating subsidiaries and the Group's principal business activities of insurance and asset management are subject to comprehensive regulation and supervision in each of the various jurisdictions where the Group operates. Given that the AXA Group is headquartered in Paris, France, this supervision is based to a significant extent on European Union directives and on the French regulatory system. The

AXA Group's principal supervisor is the French Autorité de Contrôle Prudentiel et de Résolution ("ACPR").  
Autorité de Contrôle Prudentiel et de Résolution; 61, rue Taitbout – 75436 Paris Cedex, 9.

## Statutory auditors

The auditors, KPMG, Chartered Accountants and Statutory Auditors, were appointed on 14th June 2023 following the resignation of Mazars in accordance with Section 383(2) of the Companies Act 2014 and have expressed their willingness to be reappointed.

### Independent Auditor

KPMG Appointed 14th June 2023

Chartered Accountants and Statutory Auditor  
1 Harbourmaster Place  
International Financial Service Centre  
Dublin 1

Hubert Crehan is the lead partner from KPMG.

## / Major Shareholders and Related party transactions

### Capital ownership

The ultimate parent of AXA Insurance dac and controlling undertaking is AXA SA, a company incorporated in France. The Company consolidates its reporting into the group financial statements of AXA SA.

The parent undertaking of the smallest group which includes the Company and for which group financial statements are prepared is Guardian Royal Exchange plc, a company registered in England. Copies of the Guardian Royal Exchange plc financial statements can be obtained 20 Gracechurch Street London EC3V 0BG.

AXA Insurance dac is a wholly owned subsidiary of AXA Ireland Limited and is incorporated in Ireland. Copies of the financial statements of AXA Ireland Limited may be obtained from the Company at Wolfe Tone House, Wolfe Tone Street, Dublin 1. AXA Ireland Limited has availed of the section 299 exemption under Companies Act, 2014 and does not prepare consolidated group accounts.

## / Business Overview

### PROPERTY & CASUALTY

#### MARKETS AND COMPETITION

In the Property & Casualty segment, AXA writes business in both Northern Ireland and the Republic of Ireland. In the International Private Medical Insurance segment AXA underwrites business in the European Economic Area excluding Ireland.

#### PRODUCTS AND SERVICES

AXA's Property & Casualty insurance operations offer a broad range of insurance products for both Personal and Commercial customers for the following lines of business;

- Private motor
- Household
- Personal property
- Commercial motor
- Commercial property

- Commercial liability
- Farm
- International Private Medical Insurance
- Health Insurance (effective January 1<sup>st</sup>, 2025)

## **DISTRIBUTION CHANNELS**

AXA distributes its Property & Casualty insurance products through a number of channels including exclusive franchisees, brokers, salaried sales forces, direct / internet sales in addition to international healthcare, banking, supermarket partners.

From January 1<sup>st</sup> 2025, AXA Insurance dac underwrites Healthcare business sold by Laya Healthcare.

Development of distribution channels is key to reach targeted customers and overall, for the profitability of the activity.

## **/ Operating Highlights**

### **SIGNIFICANT ACQUISITIONS**

There were no significant acquisitions by AXA Insurance dac in Ireland in the reporting period .

### **SIGNIFICANT DISPOSALS**

There were no significant disposals in Ireland in the reporting period.

## **/Subsequent events**

There have been no significant events since the balance sheet date that resulted in amendment of the financial statements.

## A.2 Underwriting Performance

### / Insurance revenues by geographical area (material lines of business)

#### Gross revenues by geographical area

<i>(in Euro million except percentages)</i>	2024		2023	
Ireland	775	69%	780	74%
United Kingdom	296	26%	224	21%
Europe	51	5%	47	4%
<b>TOTAL</b>	<b>1123</b>	<b>100%</b>	<b>1050</b>	<b>100%</b>

#### Current year operating performance

<i>(€ Million)</i>	2024	2023
Insurance Revenues	1151	1065
Insurance Service Expenses	(1,016)	(979)
Net expenses from reinsurance contracts held	(70)	(40)
<b>Insurance service result</b>	<b>65</b>	<b>46</b>
Finance (expense)/income from insurance contracts issued	(50)	(19)
Finance income/(expense) from reinsurance contracts held	1	1
<b>Net insurance finance (expense)/income</b>	<b>(49)</b>	<b>(18)</b>
<b>Net Insurance Result</b>	<b>17</b>	<b>28</b>

### / Underwriting performance by product line (all lines of business)

The table below presents gross revenues by major product line:

#### Gross revenues by product line

<i>(in Euro million except percentages)</i>	2024		2023	
Property & Casualty	1100	96%	1018	96%
Health	51	4%	47	4%
<b>Total</b>	<b>1151</b>	<b>100%</b>	<b>1065</b>	<b>100%</b>

Insurance revenues grew by 8% during the year driven by premium increases, most notably on the Personal Lines portfolio across both Motor and Household lines of business.

Insurance Service Expenses increased by €38m to €1,016m mainly driven by increased claims costs. Claims costs deteriorated due an increase in motor accident numbers, coupled with increased cost of injury claims incurred.

Net expenses from reinsurance contracts held remained stable overall. An overall reduction in expenses reflects the impact of increased treaty costs, offset by an increase in reinsurance recoveries.

Finance expense from insurance contracts issued increased by €31m as a result of movements in foreign exchange, together with unwinding of closing discount rates. Unwind effect was higher in FY24 as the discount effect of more recent accident years, which have higher locked-in yield curves, have begun to runoff.

<i>(in Euro million except percentages)</i>	2024		2023	
<b>Personal Lines</b>	<b>775</b>	<b>67%</b>	<b>711</b>	<b>72%</b>
Motor	655	57%	605	62%
Homeowners/Household	119	10%	105	9%
Other	1	0%	1	0%
<b>Commercial Lines</b>	<b>297</b>	<b>26%</b>	<b>293</b>	<b>25%</b>
Motor	177	15%	175	20%
Property Damage	102	9%	102	5%
Liability	18	2%	16	1%
<b>Other</b>	<b>28</b>	<b>2%</b>	<b>14</b>	<b>0%</b>
<b>Total P&amp;C</b>	<b>1100</b>	<b>96%</b>	<b>1018</b>	<b>97%</b>
<b>Total Health</b>	<b>51</b>	<b>4%</b>	<b>47</b>	<b>3%</b>
<b>Total</b>	<b>1151</b>	<b>100%</b>	<b>1065</b>	<b>100%</b>

## **/ Aggregate underwriting performance**

### **Operating Income and expenses**

Insurance Service Expenses increased by €38m to €1,016m mainly driven by increased claims costs. Claims costs deteriorated due an increase in motor accident numbers, coupled with increased cost of injury claims incurred.

Net expenses from reinsurance contracts held remained stable overall. An overall reduction in expenses reflects the impact of increased treaty costs, offset by an increase in reinsurance recoveries.

Finance expense from insurance contracts issued increased by €31m as a result of movements in foreign exchange, together with unwinding of closing discount rates. Unwind effect was higher in FY24 as the discount effect of more recent accident years, which have higher locked-in yield curves, have begun to runoff.

## A.3 Investment Performance

### / Net investment result

Net investment result from the financial assets of the Company was as follows:

(€ Million)	December 31, 2024						Net investment result
	Net investment income	Net realised gains and losses	Impairment changes	Net unrealised gains and losses	Investment expenses	FX	
Investment in real estate properties	3	0	0	0	0	0	3
Debt instruments	52	3	(0)	8	0	37	100
Equity instruments	1	0	0	0	0	0	1
Investment funds	27	24	0	(28)	0	14	37
Loans	1	0	0	0	0	0	1
Derivative instruments	8	(15)	0	(21)	0	1	(27)
Other	22	(0)	0	0	(4)	(0)	18
<b>Net Investment Result</b>	<b>114</b>	<b>12</b>	<b>(0)</b>	<b>(41)</b>	<b>(4)</b>	<b>52</b>	<b>133</b>

(€ Million)	December 31, 2023						Net investment result
	Net investment income	Net realised gains and losses	Impairment changes	Net unrealised gains and losses	Investment expenses	FX	
Investment in real estate properties **	4	0	0	(21)	0	(0)	(17)
Debt instruments **	57	(8)	0	30	0	(9)	70
Equity instruments **	1	0	0	0	0	(1)	0
Investment funds	19	(3)	0	1	0	0	17
Loans	1	0	0	0	0	0	1
Derivative instruments **	6	(30)	0	1	0	15	(8)
Other	16	0	0	0	(3)	(1)	12
<b>Net Investment Result</b>	<b>104</b>	<b>(41)</b>	<b>0</b>	<b>11</b>	<b>(3)</b>	<b>4</b>	<b>75</b>

Note cells with 0 value contain values rounding to less than one

\*\* Reclassification between realised and unrealised debt/equity/derivative instruments in line with current year classification

#### Investment Performance - Investment Result

The company has continued to maintain a balanced, diversified and risk appropriate strategy, which has resulted in increased Net investment income, +€58m, reflecting a continuation of strong interest rates.

#### / Gains and losses directly recognised in Equity

The Company prepares its statutory financial statements in accordance with Irish legislation and International Financial Reporting Standards. In adopting this standard, it applies the following policy to financial instruments it classifies as Available for sale:

An available for sale security (AFS) is a debt or equity instrument that is not classified as one of the following as Trading securities or Held-to-maturity securities. AFS classification is assigned to investments where the intent is to hold them until the maturity date. These classifications are mandated by Generally Accepted Accounting Principles for recording investments in the accounting records of a business. The classification is made when a security is purchased. financial assets are recognised initially at their fair value, including transaction costs; and subsequently measured at fair value, with unrealised gains or losses recognised in the revaluation reserve of the statement of

comprehensive income. When the asset is disposed or impaired, the accumulated fair value adjustment in the revaluation reserve is transferred to the profit and loss account.

Derivative financial instruments are designated as held for trading and measured at fair value, with gains and losses recognised in profit or loss account, unless they are designated and effective hedging instruments.

## **/ Investments in securitisation**

The Company held Asset Backed Securities at 31 December 2024 with a purchase value of €179m (2023 €179m) and market value of €180m (2023 €175m).

## ***A.4 Performance of other activities***

### **/ Net Income**

#### **Property & Casualty segment**

AXA Insurance's business is the transacting of motor and other property and casualty insurance business in both the Republic and North of Ireland. The company consists of a number of segments all of which relate to Property & Casualty insurance.

### **/ Leasing Arrangements**

The Company accounts for leases under IFRS 16. The Company recognises a right-of-use asset and related lease liability. The Company has not availed of the short-term lease exemption electing to recognise right of use assets and liabilities for leases where the total lease term is less than or equal to 12 months.

## ***A.5 Any other information***

Not applicable

# System of Governance

AXA's contributions to more inclusive and stronger societies



## 02 AXA Local Community Awards

An initiative to support communities in which we work by recognising and rewarding the amazing work carried out by local groups to build skills and create a better future for their communities.

- B.1** General information on the system of governance
- B.2** Fit and proper requirements
- B.3** Risk Management system including the own risk and solvency assessment
- B.4** Internal control system
- B.5** Internal audit function
- B.6** Actuarial function
- B.7** Outsourcing
- B.8** Any other information

# B

## **B. System of Governance**

### **B.1 General information on the system of governance**

Governance

Compensation policy

Long term incentives

Performance Shares and International Performance Shares

Stock Options

Commitments made to executive officers

Material transactions with shareholders, persons who exercise a significant influence and corporate officers or executives

Assessment of the adequacy of the system of governance

### **B.2 Fit and proper requirements**

Fit and Proper assessment process for the persons who effectively run the undertaking and heads of key functions

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

Risk Management system

AXA Group Internal model

Own Risk and Solvency Assessment

### **B.4 Internal control system**

Internal control system

### **B.5 Internal audit function**

Internal audit function

### **B.6 Actuarial function**

Actuarial function

### **B.7 Outsourcing**

Outsourcing arrangements

### **B.8 Any other information**

## ***B.1 General information on the system of governance***

### **/ Governance**

#### **Board of Directors**

##### ***Roles and Powers***

The Board's mandate includes:

- Organising itself such that it is able efficiently to discharge its responsibilities, including the clear, documented delegation of tasks and functions to the Chief Executive Officer and others within the Company;
- Establishing a suitable, rigorous internal process for the selection, appointment and reappointment of Directors to meet appropriate standards of propriety, skill, experience and qualification (whilst also complying with the Central Bank of Ireland Fitness and Probity Standards, the Senior Executive Accountability Regime ("SEAR") and, where applicable, the requirements of the Prudential Regulation Authority and Financial Conduct Authority's Senior Management and Certification Regime ("SMCR") as regards its branch operations in Northern Ireland);
- Approving Board and Senior Management appointments (Senior Management being defined as members of the Executive Management Committee or persons who hold pre-approval-controlled functions as required by the Fitness and Probity Standards issued by the Central Bank of Ireland, the SEAR and, in respect of Company's Northern Ireland branch operations, those holding Senior Management Functions and Key Control Function Holders). The Board shall review such roles from time to time;
- Approving the Statutory Financial Statements and the Solvency II Supervisory Reports and Public Disclosure Reports of the Company and any equivalent reporting requirements as applicable in respect of the Company's Northern Ireland branch operations;
- Helping to develop business strategy and objectives for the Company from AXA Group Plans;
- Formally approving the strategy, business plans and other financial targets/ performance of the Company;
- Periodically reviewing the strategy, business plans and other financial targets/ performance, taking into account the regulatory perspective of the Company, ensuring that it is able to efficiently discharge its regulatory responsibilities to the Central Bank of Ireland (and the Financial Conduct Authority and/or the Prudential Regulatory Authority as regards its branch operations in Northern Ireland) and the Health Insurance Authority;
- Evaluating and reviewing the effectiveness of key controls within the Company, taking into account the regulatory perspective of the company, ensuring that it is able to efficiently discharge its regulatory responsibilities to the Central Bank of Ireland and the Health Insurance Authority (and the Financial Conduct Authority and/or the Prudential Regulatory Authority as regards its branch operations in Northern Ireland);
- Embedding the Consumer Protection Code (issued by the Central Bank of Ireland) and the Consumer Duty requirements (issued by the Financial Conduct Authority) effectively into the culture of the business such that consumers are consistently treated fairly;
- Ensuring compliance with the Corporate Governance Requirements for Insurance Undertakings 2015, the Fitness and Probity Standards, SEAR, the SMCR, the Digital Operational Resilience Act ("DORA") and any other Codes or Regulations issued from time to time by the Central Bank of Ireland or the Prudential Regulation Authority and/or the Financial Conduct Authority as applicable to the Northern Ireland branch operations;
- Approving the Company's Risk Appetite and associated limits taking into account the advice from the Board Risk Committee;
- Monitoring and reviewing relevant risks by:

1. Overseeing an effective and robust control framework;
  2. Analysing the effectiveness of Risk Management;
  3. Ensuring this is integrated into all aspects of decision-making; and
  4. Monitoring the risk governance system (including DORA related requirements).
- Determining appropriate investment strategies and guidelines;
  - Establishing and sustaining an ethical corporate culture within the Company;
  - Setting the correct “tone from the top”, leading by example and ensuring that good standards of behaviour permeate throughout the Company;
  - Monitoring and reviewing the economic and regulatory solvency of the Company by;
    1. Ensuring the internal model is appropriate, operates effectively and is embedded in all relevant key risk decision making processes;
    2. Ensuring appropriate internal model governance, including approval of the internal model policy and any major changes;
    3. Ensuring that the internal model is subject to independent review;
    4. Approving and monitoring the Own Risk & Solvency Assessment (“ORSA”) process both for the Company as a whole and as applicable separately in respect of the Company’s Northern Ireland branch operations to ensure an effective implementation; and
    5. Reviewing and signing off the ORSA report and public reporting (“SFCR”) both for the Company as a whole and any equivalent requirements separately applicable in respect of the Company’s Northern Ireland branch operations

The Board of AXA Insurance dac meet as often as is appropriate to fulfil its responsibilities effectively and prudently. In any event, the Board meets at least six times per calendar year and at least three times in every six-month period in accordance with the requirements of a “High Impact designated institution” set out in the Corporate Governance Requirements for Insurance Undertakings 2015 issued by the Central Bank of Ireland, and at the request of the Chairman.

### **Composition of the Board**

Mr. Desmond Crowley	(Chairman & Independent Non–Executive Director)
Ms. Marguerite Brosnan	(Chief Executive Officer - AXA Insurance dac)
Ms. Tara Foley	(Group Non-Executive Director & Chief Executive Officer – AXA UK & Ireland)
Ms. Caroline McDonnell	(Independent Non–Executive Director)
Mr. Gerard McGinn	(Independent Non–Executive Director)
Ms. Rosemary Quinlan	(Independent Non-Executive Director)
Mr. Dimitrios Velmachos	(Independent Non-Executive Director)
Mr. Richard Whelan	(Chief Financial Officer & Deputy Chief Executive Officer)
Mr. Jonathan Walker	(Group Non-Executive Director)

The Directors of AXA Insurance dac are required to comply with the Fitness and Probity Standards issued by the Central Bank of Ireland.

### **Board of Directors’ Committees**

The Company satisfies the requirements specified in the Central Bank of Ireland Corporate Governance Requirements for Insurance Undertakings 2015 for a ‘High Impact designated institution’ through delegation to the following committees:

- i. AXA Insurance dac Audit and Compliance Committee
- ii. AXA Insurance dac Risk Committee
- iii. AXA Insurance dac Investment and ALM Committee
- iv. AXA Insurance dac Nomination Committee
- v. AXA Insurance dac Remuneration Committee

## ***Executive Management Committee***

The AXA Insurance dac Executive Management Committee comprises the Chief Executive Officer, the Deputy Chief Executive Officer & Chief Financial Officer, Head of Actuarial Function, Claims Director, Chief Operations Officer, Pricing, Underwriting & Customer Analytics Director, Chief Innovation & Strategy Officer, Chief Risk Officer, Chief People Officer, Direct Retail Director, Intermediary & Commercial Director, Health Director, and the Director of Communications & Brand. The Committee shall make recommendations to the Chief Executive Officer of AXA Insurance dac who serves as the main link between the Executive Management Committee and the Board.

## **Internal audit function**

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

The AXA insurance dac Internal Audit function has an audit charter to document its mission, independence, scope, accountabilities, responsibilities, authorities and standards. The charter is approved by the relevant Audit Committee each year.

The head of the AXA Insurance dac Internal Audit function has a direct and unfettered reporting line directly to the Audit Committee Chairman.

AXA Insurance dac Internal Audit functionally reports through to the Global Head of Audit who reports to the Group Audit Committee Chairman.

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

Over the audit cycle, all applicable audit universe components for each entity are expected to be audited. Any exceptions identified are notified to the AXA Insurance dac Audit and Compliance Committee for ratification.

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

## **Actuarial function**

Solvency II regulation requires insurance and reinsurance companies to provide for an effective actuarial function to:

- a) coordinate the calculation of technical provisions;
- b) ensure the appropriateness of the methodologies and underlying models used as well as the assumptions made in the calculation of technical provisions;
- c) assess the sufficiency and quality of the data used in the calculation of technical provisions;
- d) compare best estimates against experience;
- e) inform the management and the Board of the reliability and adequacy of the calculation of technical provisions;
- f) oversee the calculation of technical provisions;
- g) express an opinion on the overall underwriting policy;
- h) express an opinion on the adequacy of reinsurance arrangements; and
- i) contribute to the effective implementation of the risk-management system, in particular with respect to the risk modelling underlying the calculation of the capital requirements

A group Actuarial function has been set up with a specific role to define and coordinate the tasks undertaken by the Group actuarial function stakeholders (notably GRM and PBRC) as well as the local/regional actuarial functions established in insurance entities across the Group as required by the Group Actuarial function standard.

Group Actuarial Function relies on the current AXA system of governance (standards, policies, guidelines, frameworks or committees) to carry out its activities notably for issuing the opinions on the overall underwriting policy, the reliability and adequacy of the calculation of technical provisions and the adequacy of reinsurance arrangements.

The Group and local actuarial function prepare an actuarial function report to inform the management and the Board on its conclusions about the reliability and adequacy of the calculation of technical provisions. This report will also provide an overview of the activities undertaken by the actuarial function in each of its areas of responsibility during the reporting period.

The main conclusions of the Actuarial Function report are presented in the Executive Summary of the ORSA report.

In addition to the Actuarial Function role, the Central Bank has introduced specific domestic requirements regarding the actuarial function and related governance arrangements which apply to all (re)insurance undertakings subject to Solvency II.

Undertakings are required to notify the Central Bank of the person proposed to take responsibility for the Actuarial Function. Undertakings do this via the Central Bank Fitness & Probity regime where the position is a PCF position, called Head of Actuarial Function (the "HoAF"), and as such, will require Central Bank preapproval before the proposed individual can be appointed to the position. The Central Bank of Ireland has advised that, for AXA, the HoAF and the CRO role cannot be held by the same person.

In that regard AXA Insurance dac meet the following Central Bank of Ireland requirements;

- Undertakings shall appoint a Head of Actuarial Function.
- The responsibility for the tasks called out for the actuarial function under Solvency II and the responsibilities introduced by virtue of the "2018 Domestic Actuarial Regime Related Governance Requirements under Solvency II" and, shall be held by one individual, i.e. the HoAF, who is suitably fit and proper to hold those responsibilities. While the operational activities to fulfil those responsibilities can be spread across a number of individuals the Central Bank requires there to be one individual with overall responsibility for ensuring compliance with the relevant requirements and answerable to the Board, in that regard. That individual shall have the prerequisite level of experience commensurate with the requirements of the role and the sophistication of the methodologies and techniques appropriately employed by the undertaking. The HoAF shall be a member of a recognised actuarial association, for example one that is a member of the Actuarial Association of Europe.
- Where an undertaking is designated as a High Impact undertaking, the HoAF shall be an employee of the undertaking. The term "employee" means a direct employee of the undertaking, or an employee provided through a group services company on a full-time basis. AXA is a high impact firm.
- The undertaking shall ensure that the HoAF provides an actuarial opinion to the Central Bank on an annual basis. Responsibility for the actuarial opinion rests with the HoAF, using his or her professional judgement. The opinion shall address the Technical Provisions (the "TPs") of the undertaking as reported in any annual quantitative reporting templates ("QRTs") to the Central Bank with a financial reporting date on or after 30th June 2016. This shall be referred to as the Actuarial Opinion on Technical Provisions (the "AOTPs").

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

- The undertaking shall ensure that the HoAF provides an actuarial opinion to the Board in respect of each own risk and solvency assessment ("ORSA") process of the undertaking.

The opinion will address, at a minimum and having regard to the undertaking's individual risk situation, the following:

- The range of risks and the adequacy of stress scenarios considered as part of the ORSA process.
- The appropriateness of the financial projections included within the ORSA process.

- Whether the undertaking is continuously complying with the requirements regarding the calculation of TPs and potential risks arising from the uncertainties connected to this calculation.

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

### Risk management function

Risk Management is a local responsibility, in accordance with Group Risk Management standards and guidelines.

The roles and responsibilities of Risk Management teams are validated jointly by the Executive Committees and the Group Chief Risk Officer to ensure a better alignment of central and local interests.

The minimum missions required for Risk Management teams are:

- coordinating the second line of defence locally through specific governance;
- implementing risk appetite on all risks consistently with Group's risk appetite (and taking into account the requirements of the Corporate Governance Requirements for Insurance Undertakings [2015]), with strengthened reporting, risk limits and decision processes;
- performing a second opinion on key processes, such as the definition of characteristics for new products before launch, asset liability management (ALM) studies & asset allocation and reinsurance strategy;
- on the internal capital model, Risk Management is responsible for checking the adequacy of the risk profile, implement, test and validate the internal model.

The Chief Risk Officer has regular reporting to the Risk Committee on Risk Management matters.

### Other functions

Line management and staff are responsible for day-to-day Risk Management and decision making and therefore have primary responsibility for establishing and maintaining an effective control environment (first line of defence).

Legal, Compliance, Internal Financial Control, Human Resources and Security Departments are responsible for developing, facilitating and monitoring effective risk and control framework and strategy (second line of defence), in coordination with Risk Management.

## **Remuneration policy**

The AXA Remuneration policy is designed to support the Group's long-term business strategy and align the interests of its employees and other stakeholders by

- (1) establishing a clear link between performance and remuneration over the short, medium and long term
- (2) ensuring that AXA can offer competitive arrangements while avoiding potential conflicts of interest that may lead to undue risk taking for short term gain, and
- (3) ensuring compliance with Solvency II regulations and any other applicable regulatory requirements.

In line with the requirements of the Central Bank of Ireland Corporate Governance Requirements for Insurance Undertakings, AXA Insurance dac (the "Company") has documented the Company's Executive Remuneration Policy.

The Company is required to establish remuneration policies and procedures based on best practice, AXA Group and AXA UK and Ireland Standards and Remuneration Policy as well as any requirements which the Central Bank of Ireland may issue. The Remuneration Committee shall

specifically ensure that the executive remuneration program is effective, reasonable and rational with respect to critical factors such as the Company's performance, industry considerations, risk considerations and compensation paid to other employees. The Remuneration Committee shall also ensure that the structure of executive compensation is fair, non-discriminatory and forward-looking.

## **AXA Group Remuneration Policy**

AXA Group Remuneration Policy is applicable to all AXA Group companies and their employees.

The AXA Group Remuneration policy is designed to:

- attract, develop, and motivate critical skills and best talents;
- drive superior performance;
- align remuneration levels with business performance;
- ensure that employees are not incentivised to take inappropriate and/or excessive risks and that they operate within AXA's overall risk framework; and
- ensure compliance of AXA's practices with all applicable regulatory requirements.

It follows four guiding principles:

- competitiveness and market consistency of the remuneration practices;
- fairness, based on individual and collective performance, in order to ensure remuneration reflecting employee's individual quantitative and qualitative achievements and impact;
- Internal equity based on remuneration policies and procedures designed to ensure that employees are paid equitably based on objective and justifiable professional criteria (such as but not limited to role, skills, contribution or impact), and do not discriminate on the basis of gender or other factors irrelevant factors to the role duties; and
- achievement of the Group's overall financial and operational objectives over the short, medium and long term as well as execution against medium and long-term strategic objectives as a prerequisite to fund any mid-to-long term award.

The requirements set out in the Group Remuneration Policy may be supplemented where necessary in order to comply with local regulatory requirements or identified best practices.

## **Compensation of the Executive Officers on December 31, 2024**

### **Compensation structure**

AXA applies a "pay-for-performance" approach which (i) promotes long-term sustainable performance by incorporating risk adjustment measures in variable compensation schemes and (ii) recognises employees who bring the greatest value to the firm on the basis of financial results, while demonstrating individual leadership and behaviours.

In this context, the overall remuneration structure is based on the following components, which are designed to provide balance and avoid excessive risk taking for short term financial gain:

- a fixed component which comprises guaranteed elements, such as base salary and a small number of fixed allowances (if applicable). It takes into account the banding of the role, job content, responsibilities, experience, market practices, technical skills and leadership competencies required of the role, and also sustained individual performance and criticality or scarcity of skills. AXA closely monitors the competitiveness of the individual fixed remuneration by comparing individual fixed remuneration with similar positions in the financial industry (insurance, asset management and banks)
- a variable component which comprises an upfront cash element (Short Term Incentive) and may be supplemented by a deferred element which is awarded through equity-based instruments or equivalent such as AXA Performance Shares or AXA Restricted Shares. (Long Term Incentive). This variable component depends on the AXA Group's global performance, on the beneficiary's local entity performance (company or business unit, depending on the case), and on the achievement of the executive's individual objectives including demonstrated abilities for leadership. In the case of Heads of Control functions, the short-term incentive pay-out is determined based on individual performance and the job holder remains independent from the Entity/Business Unit performance which they supervise.
- AXA ensures suitable balance between fixed and variable components so that the fixed component represents a sufficiently high proportion of the total remuneration to avoid

employees being overly dependent on the variable components and to allow AXA to operate a fully flexible bonus policy, including the possibility of paying no variable compensation. All variable remuneration amounts are awarded in accordance with performance and there is no minimum payment guaranteed.

- The proportion of variable remuneration is determined according to the following complementary criteria (i) internal fairness with a similar job at the same level in an equivalent perimeter (ii) market practices reflected by external benchmark from an independent provider and (iii) level of seniority within the organisation and if applicable (iv) any regulatory requirements.
- To ensure sound and effective Risk Management, including that variable remuneration is in line with performance and conduct as required by the regulations, malus (partial or full reduction of not yet paid and/or vested variable remuneration components) or claw-back (repayment of partial or full amount of variable remuneration components already paid and/or vested) may be applied at the discretion of the Board of Directors in defined circumstances set out in the Executive Remuneration Policy.
- As a Material Risk Entity since 2024, all AXA Ireland Executive Committee Members and all Heads of Control Functions variable remuneration will be subject to at least 40% deferral of the actual total variable remuneration. A de-minimis threshold does not apply.
- AXA Ireland Executive Committee Members who meet the criteria below have been selected as Group Identified Staff as they are a member of the local Executive Committee of a Material Risk Entity.
  - The criteria used to select Identified Staff are:
    - The employee is the Group Chief Executive Officer;
    - The employee is a member of the Management Committee;
    - The employee is a member of the Partners Group;
    - The employee is a member of the Regional or local Executive Committee of a Material Risk Entity;
    - The employee is responsible for one of the following key control functions at Group level or in a Material Risk Entity: Risk Management, Compliance, Internal Audit or Actuarial;
  - Head of Control Functions who are not members of the AXA Ireland Executive Committee have also been selected as Group Identified Staff and Solvency II Identified Staff because of their role.
  - The four Key Control Function roles are CRO, Chief Actuary, Head of Compliance and Head of Internal Audit.
  - For Heads of Control functions, only their target bonus and personal performance will be taken into account as Solvency II requires their variable remuneration be entirely independent from the performance of the operating company.

## **/ Long term incentives**

AXA recognises the importance of aligning remuneration over long term value creation by deferring a substantial portion of the individual's total variable compensation (i.e. STI plus LTI). Beneficiaries and individual AXA LTI grants are determined taking into account (i) the criticality of the job within the organization, (ii) the criticality of the individual in the current job and potential for the future, and (iii) the sustainability of the individual contribution. The main deferred Long Term Incentive instruments used are Performance Shares or AXA Restricted Shares.

## **/ Performance Shares and International Performance Shares**

AXA Performance Shares are designed to recognise and motivate the Group's best talents and critical skills by aligning the individuals interests with the overall performance of the Group, and the corresponding operational Entity/Business Unit as well as with the stock performance over the medium-term (3-5 years).

AXA Performance shares are subject to a deferral period of 3 years and performance conditions.

During the performance period, all AXA Performance Shares initially granted are integrally subject to performance conditions regardless of the beneficiary's status. These criteria measure both the financial and operational performance of the AXA Group as well as the beneficiary's operating business performance, according to pre-determined targets.

The nature of these criteria as well as the associated targets are defined and reviewed on a regular basis by the Board of Directors.

The achievement rate of the performance indicators is used to determine the number of AXA shares which will be definitively acquired by the beneficiaries at the end of the acquisition period, under the condition that the beneficiary is still employed by the AXA Group. The number of AXA shares definitively granted shall therefore be equal to the number of rights to AXA Performance shares initially granted multiplied by the performance rate, which may vary between 0% and 130%.

In the event that, outside regulatory constraints (whether or not taking the form of an administrative measure), no dividend would be proposed for payment by the Board of Directors to the shareholders of AXA SA for any of the fiscal years of the performance period, the number AXA Performance Shares definitively granted would be automatically divided by 2.

## **AXA Restricted Shares**

AXA Restricted Shares are aimed at recognising and retaining talents. AXA Restricted Shares are subject to a deferral period of 3 years and a Group Sustainability underpin i.e., a minimum Group Sustainability criteria requirement to be met.

To benefit from the totality of AXA Restricted Shares initially granted, the minimum Group Sustainability criteria shall be met at the end of the performance period. AXA Restricted Shares will be definitively acquired by the beneficiaries at the end of the acquisition period, under the condition that the beneficiary is still employed by the AXA Group.

## **Directors' Fees**

No Directors' fees are paid by the Company to Directors exercising executive functions at AXA Insurance dac.

## **/ Commitments made to executive officers**

### **Pension**

The Company closed the AXA Ireland Pension Fund to future pension accrual with effect from the 31<sup>st</sup> July 2015. Following the closure to accrual, active members of the Defined Benefit scheme transferred into the Company's existing Defined Contribution scheme with effect from the 1<sup>st</sup> August 2015 and accrue benefits from the defined contribution scheme in line with the Scheme rules of employer and employee contribution.

The Defined Benefit scheme has a retirement age of 60 or 62 dependent on existing normal retirement date. Active defined benefit members will join the defined contribution scheme with a retirement age of 60/ 62 (whichever is relevant). Where an employee requests to retire earlier or later than age 60/62 (whichever is relevant), Company and Trustee consent may be required.

## **/ Material transactions with shareholders, persons who exercise a significant influence and corporate officers or executives**

### ***Key Management and Directors***

To the best of the Company's knowledge, based on information reported to it:

- various members of the Company's Board of Directors as well as various other executive officers and Directors of other AXA Group companies may, from time to time, purchase insurance, or other products or services offered by AXA in the ordinary course of its business. The terms and conditions are substantially similar to the terms and conditions generally available to the public or to AXA employees in general.

## **/ Assessment of the adequacy of the system of governance**

### ***The Board of Directors***

In line with the obligations arising from the Corporate Governance Requirements for Insurance Undertakings 2015 issued by the Central Bank of Ireland, AXA Insurance dac submits a Compliance Statement annually (or as notified) to the Central Bank of Ireland. In line with Board Directors' Review Policy, the Board formally reviews its overall performance, the Chair and that of individual Directors, relative to the board's objectives. In addition, every three years an evaluation by an external evaluator is undertaken in line with the Corporate Governance Requirements for Insurance Undertakings 2015.

### **The Audit Committee**

In line with AXA's documented Audit Committee Roles and Responsibilities Guidance, the Audit & Compliance Committee also undertakes a facilitated annual self-assessment. The self-assessment comprises of pre-determined statements that are scored. A summary of the results is then provided to both the AXA Insurance dac Audit & Compliance Committee and the AXA Group Audit Committee.

## **B.2 Fit and proper requirements**

Within AXA Insurance dac, the Chief Executive Officer manages the undertaking.

Within the AXA Group, the key function heads in application of the Solvency II Regulation are:

- the Chief Risk Officer,
- the Head of Internal Audit,
- the Head of Compliance,
- the Head of the Actuarial Function.

### **/ Fit and Proper assessment process for the persons who effectively run the undertaking and heads of key functions**

AXA Insurance dac is a Regulated Financial Service Provider (RFSP) regulated by the Central Bank of Ireland and as such is required to comply with the Fitness and Probity regulations that came into effect on 1st December 2011 for all regulated financial service providers. The Regime prescribes approximately 50 senior positions as Pre-Approval Controlled Functions (PCFs) and also prescribes specific functions as Controlled Functions (CFs). The prior approval of the Central Bank is required before an individual can be appointed to a PCF role.

The Fitness and Probity Standards provide that an individual performing a PCF or CF is required to be:

- competent and capable;
- honest, ethical and to act with integrity; and
- financially sound

The list of PCFs includes the key function heads in application of the Solvency II regulations:

- Chief Risk Officer
- Head of Actuarial Function
- Head of Internal Audit
- Head of Compliance

A Regulated Financial Service Provider (RFSP) must not permit an individual to perform a PCF unless it is satisfied on reasonable grounds that the individual complies with the Fitness and Probity Standards and has obtained confirmation that the individual has agreed to abide by those standards. RFSPs are responsible for ensuring that individuals performing PCFs meet the Fitness and Probity Standards both prior to appointment and on an on-going basis.

AXA Insurance dac is not allowed to appoint an individual to a PCF role without the prior approval from the Central Bank, this process will include confirmation from the individual they will comply with the standards, due diligence and background checks are also completed. An annual process, including due diligence and background checks are also completed for all PCFs to ensure the individuals comply with the standards on an on-going basis.

AXA Insurance dac has a Fitness and Probity Policy in place.

AXA Insurance dac operates under a Prudential Regulatory Authority (PRA) / Financial Conduct Authority (FCA) approved Third Country Branch in Northern Ireland. This Third Country Branch is subject to the PRA/FCAs Senior Managers and Certification Regime (SMCR).

The SMCR requires that Senior Managers and Certified Population are assessed as 'fit and proper' at all times to enable them to perform their role effectively and in accordance with relevant regulatory requirements. Fitness and propriety is assessed both at appointment of a role and on an ongoing basis. Individuals in scope are issued with a certificate to evidence that AXA Insurance dac has considered them fit and proper to perform their function. Certificates are issued at initial appointment and annually on an ongoing basis by the AXA Insurance dac Compliance Department.

Any matters highlighted by the assessment will be reviewed by AXA Insurance dac Human Resources who will have consideration to the significance to the matter, the duties and responsibilities of the individual concerned, and the possible impact of the matter on the individual's ability to carry out those duties and responsibilities. In circumstances where AXA Insurance dac acts in respect of an individual deemed to be no longer fit and proper, responsibility will fall to the Head of Compliance AXA Insurance dac to inform PRA/FCA of any concerns and the action taken.

The assessment of fitness and propriety covers three main elements:

- Honesty, Integrity and Reputation
- Competence and Capability
- Financial Soundness

#### Honesty, Integrity and Reputation

In considering honesty, integrity and reputation, individuals under scope will be assessed on the following:

- whether they have been subject to an adverse finding in civil proceedings, particularly in connection with financial business, misconduct or fraud;
- whether they have been the subject of, or interviewed, in respect of any investigation or disciplinary proceedings by a regulator;
- whether they have contravened any of the requirements and standards of the regulatory system;
- whether they have been the subject of any justified complaint relating to regulated activities;
- whether they have been dismissed or asked to resign from employment or from a position of trust, fiduciary appointment or similar;
- whether they have ever been disqualified from acting as a Director or disqualified from acting in any managerial capacity; and
- whether, in the past, they have been open and truthful in all dealings with the regulators.

#### Competence and Capability

In considering competence and capability, individuals under scope will be assessed on the following:

- whether they satisfy all relevant training and competence requirements;
- whether they have demonstrated by experience and training that they are suitable to perform their role; and
- whether they have adequate time to perform their role given other commitments they may have and the scope of the role.

#### Financial Soundness

- In considering financial soundness, individuals under scope will be assessed on the following:
- whether they are subject to a judgement, debt or award that remains outstanding or has not been satisfied within a reasonable period; and
- whether they have ever been adjudged bankrupt or been involved in related processes or proceedings.

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

### **/ Risk management system**

#### **Risk management missions**

As an integrated part of all business processes, Risk Management is responsible for the definition and the deployment of the Enterprise Risk Management (ERM) framework within AXA Insurance dac. Local Risk Management is responsible for developing the Enterprise Risk Management framework in terms of limits/thresholds (covering Financial, Insurance and Operational risks), policies, guidelines and monitoring of the risk exposure, subject to Group standards and within a clearly defined Risk Appetite consistent with the Group's Risk Appetite.

Risk Management oversees the adherence of AXA Insurance dac to the framework, developing risk culture throughout the Company.

The CRO chairs the Risk and Compliance Forum and is a member of the Executive Risk Committee, defining risk standards, controlling Risk Appetite limits and recommending actions to mitigate risks. The CRO reports key risk matters directly to the Risk Committee, which establishes the risk control framework by validating both Risk policy and risk strategy.

This framework is based on the five following pillars, cemented by a strong risk culture:

1. Risk Management independence and comprehensiveness:

The Chief Risk Officer is independent from operations ("first line of defence") and Internal Audit Departments ("third line of defence"). The Risk Management department, together with Legal, Compliance, and Internal Financial Control constitute the "second line of defence". The objective of this second line of defence is to develop, coordinate and monitor a consistent risk framework across AXA Insurance dac.

2. Shared risk appetite framework: The Chief Risk Officer is responsible for ensuring that top management reviews and approves the risks they carry in their company, understand the consequences of an adverse development of these risks, and have action plans that can be implemented in case of unfavourable developments.

3. Systematic second opinion on key processes: The Chief Risk Officer ensures a systematic and independent second opinion, on AXA Insurance dac material decision processes, like P&C new product characteristics (risk-adjusted pricing and profitability), P&C economic reserves, Asset and Liability Management studies, Asset allocation and new investments, and reinsurance.

4. Robust economic capital model: AXA's Internal Model (STEC – Short Term Economic Capital) offers a concrete and powerful tool to control and measure exposure to most risks, in line with the Solvency II framework. AXA's Internal Model is designed as a consistent and comprehensive Risk Management tool, which also forms an important element in the capital management and planning process.

5. Proactive Risk Management: The Chief Risk Officer is responsible for early detection of risks. This is ensured through challenge of and constant dialogue with the relevant business and supported by AXA's emerging risks management framework.

#### **AXA Insurance dac Risk Management**

Risk Management is a local responsibility, in accordance with GRM standards and guidelines.

The roles and responsibilities of local Risk Management teams are validated jointly by the Executive Committees of local entities and the Group Chief Risk Officer to ensure a better alignment of central and local interests.

The minimum missions required for local Risk Management teams are:

- coordinating the second line of defence locally through specific governance;
- implementing risk appetite on all risks consistently with Group's risk appetite, with strengthened reporting, risk limits and decision processes;
- performing a second opinion on key processes, such as P&C reserves, Asset and Liabilities Management (ALM) studies & asset allocation, and reinsurance strategy;
- on the internal capital model, local Risk Management is responsible for checking the adequacy of the risk profile, implement, test and validate the internal model.

The AXA Insurance dac Chief Risk Officer heads the local Risk Management team and reports both to the CEO and to the AXA UK CRO. Chief Risk Officer is independent from operations and Internal Audit Departments.

The AXA Insurance dac Chief Risk Officer regularly reports to the Audit & Compliance Committee, Risk Committee and the Board of Directors on Risk Management matters.

The Risk Management team is responsible for controlling and managing risks within Group policies and limits.

### ***Other functions***

Line management and staff are responsible for day-to-day risk management and decision making and therefore have primary responsibility for establishing and maintaining an effective control environment (first line of defence).

Legal, Compliance and Internal Financial Control Departments are responsible for developing, facilitating and monitoring effective risk and control framework and strategy (second line of defence), in coordination with Risk Management. Internal Audit performs, as part of its role, an assessment of risks and governance processes on a periodic basis to provide independent opinion on the effectiveness of the system of internal control (third line of defence).

### ***Risk governance within AXA Insurance dac***

In order to efficiently manage local and global risks, the decision process within the risk governance structure is divided into 2 main levels:

1. The Risk Committee defines business objectives and capital allocation with respect to investment return and risk. It also defines the Company appetite for risks in terms of impact on its key financial indicators. The Risk Appetite is endorsed by the Board of Directors upon review by its Risk Committee with the Audit & Compliance Committee considering the effectiveness of the Company's internal control and Risk Management frameworks supporting it. A report on the Company's performance against the key financial indicators is presented on a regular basis to the Risk Committee, to the Audit & Compliance Committee and to the Board of Directors. The overall risk framework is governed by the Risk Committee. The membership of the Risk Committee includes a number of Board members with attendance by the CRO and the Head of Actuarial Function.
2. Four Company internal committees contribute to Risk Management covering the following risk categories:

#### ***For P&C insurance risks:***

The decision process relating to the management of insurance risk is governed by the local Executive Risk Committee, chaired by the CEO. The members of the Executive Risk Committee are members of the Executive Committee, including the CRO and the Head of Actuarial Function, and several other business areas. The Committee mainly analyses and monitors the risk profile, its components and the related changes towards risk appetite limits defined; validates all launches or portfolio reviews of products or lines of businesses.

#### ***For Financial risks:***

The Investment and ALM Committee is primarily responsible for the management of Investments. It specifically includes some members of the Board, the Chief Investment Officer (CIO) and is attended by the CRO and the Head of Actuarial Function. The Committee approves the strategic asset allocations and the interest-rate hedging programmes. The Board delegates the determination of the level of tolerance to financial risk and the monitoring of compliance with the related limits to the Investment & ALM Committee, as part of the Risk Appetite process. This committee determines the ALM policies and ensures that the Company exposures are within the risk limits defined.

#### ***For Operational and Reputation risks:***

The Risk & Compliance Forum, a quarterly management Risk and Compliance meeting chaired by the CRO.

The Risk Management function at Group level is also reinforced by AXA S.A. who advise and support local entities in their reinsurance strategy and centralise the Group's purchasing of reinsurance.

### *For Capital Modelling*

See Capital Modelling Committee below

## **/ AXA Group Internal model**

AXA has been developing a robust economic capital model since 2007 and the AXA Group internal model has been used since 2009 in the Risk Management system and decision-making processes. AXA's main goal of using an internal model as opposed to the standard formula is to better reflect the company's risk profile in the Solvency Capital Requirement. This is considered from several aspects.

- Taking into account local specificities – AXA is a global company and caters to a wide range of insurance markets with a variety of products offered targeting certain demographics and with differing risk exposures. It is therefore appropriate, to the extent possible, to calibrate stresses specific for these risk profiles and to allow for the benefits of diversification of risks which arise as a result of being spread over these markets.
- Addressing shortcomings of the standard formula – Based on its expertise, the Group can improve on the approach of the standard formula, which is naturally constrained by its general scope, and have models more appropriate to the scope of the Group.
- Allowing for better evolution of the model over time – As the Group experience increases, business expands to new markets and product innovations create different risks to consider, the flexibility of an internal model allows the specificities of these developments to be reflected.

### ***Internal model governance***

At Group level, the governance bodies involved in the internal model governance are the following ones:

- The Group Boards of Directors
- The Management Committee
- The Solvency II Steering Committee (Group Model Committee)

At Group level, the internal model is reviewed, challenged and approved on an ongoing basis by the Solvency II Steering Committee (SII STC), co-chaired by the Group CRO and the Group CFO. The Solvency II Steering Committee is supported by risk technical working groups reviewing changes proposed to the Group internal model and presenting conclusions of these diligences to the SII STC. The SII STC also reviews internal model validation and model change processes, including links with local governance of the model. It also reviews the conclusions of the regular validation activities.

The Group results are presented quarterly to the Management Committee.

Group provides guidance on internal model design and operational processes that are defined locally. In AXA Insurance dac the Capital Modelling Committee is responsible for internal model governance.

The Committee is made up of members of the Executive Committee with members of the risk department, actuarial function and is chaired by the CRO.

### ***Internal model validation***

AXA has implemented and documented an overall regular validation process of the internal model to monitor its performance and on-going appropriateness. This process and associated governance are documented in the Group Validation Policy, endorsed by the Management Committee.

The Group Validation policy is complemented by a Model Validation policy that specifies local validation activities and responsibilities for AXA Insurance dac. This policy is endorsed locally.

Validation is performed on all parts of the Internal Model. Hence, it does not only apply to the quantitative aspects of the model (input data, theory & methodology, parameters & assumptions, data, results) but encompasses the qualitative aspects of the model: expert judgement, documentation, model governance, use test, systems/IT.

Risk management is performing regular integrated validation activities, described in the policy, mostly organised around:

- validation of the model structure, modelling choices, parameters and assumptions
- validation of the internal capital model calculation and results

These tasks are performed mostly within the Risk Management departments in charge of the model, through controls and validation activities using validation tools such as sensitivity tests, back testing, scenario testing, and stability analysis and any other relevant activity. A four eyes principle is applied for these validation activities where necessary.

These validation procedures are complemented by independent challenge and validation of assumptions, key parameters and results through committees (assumptions committees, calibration committees, clearance committees...) providing the adequate level of expertise and seniority. In particular, regional Risk Management departments and/or Group Risk Management teams provide independent challenge of the local model choices, local parameters, assumptions or calibration as well as local results.

Apart from this line-integrated validation, sanctioned by CRO review and sign-off of numbers, a comprehensive independent review process has been defined and implemented to provide adequate confidence to AXA Management and Board of Directors on the fit for purpose quality of the model and its outputs.

The independent reviews are performed by 2 internal teams and by external auditors:

- Internal Financial Control (IFC) team are responsible for assessing the effectiveness of the internal control framework over Solvency II, on the basis of the testing of processes and controls over the Eligible own Funds (EoF) and Solvency Capital requirement (SCR), at least annually
- Internal Model Review (IMR) team, Group team responsible for the in-depth actuarial review of the model under local teams responsibility, the conception and methodology when locally developed, and the local implementation of the Group principles when relevant. IMR controls are performed on a 3-year rolling basis.
- Both IMR and IFC are fully independent from the development, the governance and the processing of the internal model.
- Mazars have been engaged to provide a positive assurance opinion to the AXA Board of Directors on the compliance and consistency of the internal model with the Solvency II Directive requirements.

This process is supported by the local pricing and actuarial function teams.

The annual validation process is concluded by the issuance of the external auditors audit opinion submitted to the Board of Directors along with the conclusions of internal integrated (RM) and independent (IMR, IFC) validation activities summarised in the annual Validation report.

## **/ Own Risk and Solvency Assessment**

The Own Risk & Solvency Assessment (ORSA) encompasses processes to identify, assess, monitor, manage and report the short to medium term risks of AXA Insurance dac and to ensure the level of own funds adequacy with its solvency targets, taking into account the risk profile, approved risk tolerance limits and business strategy. As an important component of the Risk Management system, it is intended to give a comprehensive and complete vision of the risks embedded in the business of AXA Insurance dac.

ORSA mainly encompasses Risk Management and financial activities, which are organised around the following processes:

- Short Term Economic Capital (STEC) & Eligible own Funds (EoF) quarterly calculation,
- Liquidity risk reporting,
- Strategic planning and financial projections,
- Risk appetite process,
- Stress and scenario testing analysis and monitoring (Transversal stress scenario and Reverse stress test)
- Reputation and strategic risk assessment and review.

The Group has established a policy on the Own Risk and Solvency Assessment (ORSA) to set and describe the common framework and rules to consistently run and report on the ORSA across the Group.

The Own Risk and Solvency Assessment is a Board owned process. The Chief Risk Officer of AXA Insurance dac supports the Board through working on the ORSA policy and is responsible for

implementing the local ORSA process and coordinating ORSA reporting for the Board and its ORSA sub-committee.

Executive Management approves the policy, ensures that procedures are in place to implement and monitor ORSA process and approves the ORSA report.

The Board owned ORSA is prepared and approved at least once annually; at any stage the Board may request the production of a further ORSA.

The ORSA report provides assessment on:

- a. The overall solvency needs through the assessment using the internal model of the economic capital for quantifiable risks considering risk mitigation actions implemented in current economic context and approved business strategy and within approved risk appetite limits. Stress scenario analyses are performed to ensure adequacy of the economic capital assessed. This is supported by Enterprise Risk Management including the identification and monitoring of non-quantifiable risks.
- b. The compliance, on a continuous basis, with the regulatory capital requirements, through the assessment of the ability to meet capital requirements over the strategic plan horizon, both for the initial base case and for additional scenarios.
- c. The extent to which the risk profile deviates from the assumptions underlying the Solvency Capital Requirement calculated with the internal model. Extensive validation tests are performed to assess the relevance of the internal model and its assumptions for AXA Group including stress and scenario testing. Limitations of the internal model and evolution plan resulting from the validation activities are presented. Also, the extensive use of the internal model outputs for key decision-making processes provides a feedback loop for improving the modelling according to the evolution of the risk profile.

## **Board of Directors**

ORSA is a top-down process owned by the Board, to facilitate its production a Board sub-committee is established to ensure Board engagement in its production. The AXA Insurance dac ORSA report is presented to the Capital Modelling Committee and the Executive Committee for review / approval prior to final review and approval by the Board of Directors. Following approval by the Board the ORSA is submitted to the Central Bank of Ireland through its online reporting process in line with local Regulatory obligations.

This review encompasses Solvency II coverage ratio results at end of year and targets, risk and solvency management internal best practices and conclusions on management actions for material risks assessed out of the economic capital requirement.

Risk appetite, developed by Management, is reviewed by the Risk Committee and endorsed by the Board of Directors.

## **Executive Committee**

The Executive Committee participates fully in the ORSA process both in its own right and through the oversight of the report production in the Capital Modelling Committee. The Executive Committee reviews and approves the ORSA. The Executive Committee and departments under their direction are also involved in the validation of some inputs through the process of drafting of the assessment. The Executive Committee is responsible for reviewing the entire ORSA including qualitative and quantitative ORSA results and conclusions.

Beyond the annual ORSA report, a quarterly assessment is performed to update the risk profile and adapt management actions accordingly. This information is reported to the Executive Committee.

## ***B.4 Internal control system***

### **/ Internal control system**

#### **INTERNAL CONTROL AND RISK MANAGEMENT: OBJECTIVES**

#### **Objectives of the internal control system**

The AXA Group is engaged in the financial protection and wealth management business on a global scale. As such, it is exposed to a very wide variety of risks – insurance risks, financial market risks and other types of risks.

In order to manage these risks, the Group has put in place a comprehensive system of internal controls designed to ensure that executives are informed of significant risks on a timely and continuing basis, have the necessary information and tools to appropriately analyse and manage these risks, and that the financial statements and other market disclosures are timely and accurate.

These mechanisms and procedures principally include:

- the corporate governance structures which are designed to ensure appropriate supervision and management of the business as well as clear allocation of roles and responsibilities at the highest level;
- management structures and control mechanisms designed to ensure that the executives have a clear view of the principal risks faced and the tools necessary to analyse and manage these risks;
- disclosure controls and procedures designed to ensure that executives have the necessary information to make fully informed disclosure decisions on a timely basis and that the Company's disclosures on material information (both financial and non-financial) are timely, accurate and complete.

These mechanisms and procedures, taken together, constitute a comprehensive control environment that executives believe is appropriate and well adapted to the business.

## **Corporate governance structure**

Key components of the corporate governance are described earlier in this report.

## **Management structures and controls**

In order to manage the various risks to which it is exposed, the company has various management structures and control mechanisms designed to ensure that executives have a clear and timely view of the principal risks facing them and the tools necessary to analyse and manage these risks.

## **Compliance function**

The Compliance function is responsible for advising the entity's management and Board on compliance with applicable laws, regulations and administrative provisions adopted in accordance with the Solvency II Directive and other local laws and regulations, and on the impact of changes in the legal and regulatory environment applicable to AXA Insurance dac.

The function provides expertise, advice and support to the Company in order to assess situations and compliance matters, analyse compliance risk and contribute to design solutions to mitigate those risks to which AXA Insurance dac is exposed. And to ensure compliance with regulatory requirements as set out by the Central Bank of Ireland.

Compliance is managed by the Head of Compliance, a member of the senior management team, reporting to the Chief Risk Officer.

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

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

The compliance activities within AXA Insurance dac are articulated around a number of Group Standards and Policies which set the minimum requirements expected to be covered by AXA Insurance dac. The Compliance Group Standards Handbook (GSH) contain standards and policies on significant risks affecting the compliance activities as well as the high-level control and monitoring principles to which AXA Insurance dac must adhere. Both the standards and policies contained in the GSH (e.g., Compliance Governance, Sanctions, Anti-Bribery...) are mandatory. In addition, the

compliance function has adapted the Group requirements and developed local policies to align with the relevant laws and regulations in the jurisdiction in which AXA Insurance dac operates and conducts business. These local policies are reviewed regularly.

The compliance function reports directly to the Executive Committee, Audit & Compliance Committee and Board on significant compliance matters on a regular basis. These include major regulatory changes that have compliance implications, results of the Compliance Risk Assessment, the Annual Compliance Plan, outstanding remediation plans and any other significant issues that require escalation.

### **Material regulatory changes**

The Company continues to work to meet obligations the Senior Executive Accountability Regime / Individual Accountability Framework (SEAR/IAF) most recently with completion of training in this area. In addition, training on conduct standards training was delivered in Q424. The Individual Accountability Framework (IAF) has been in force since 2023 and, in July 2025, the expansion to non-executive directors (NED's will come in to place.

In the Republic of Ireland Preparation work is underway in advance of the publication of the updated Consumer Protection Code in 2025. In Northern Ireland is continuing on Consumer Duty and improvements based on FCA guidance.

The Company transitioned to IFRS17 and IFRS9 on 1st January 2023.

## ***B.5 Internal audit function***

### **/ Internal audit function**

Group Internal Audit provides the Board and Executive Management with independent and objective assurance on the effectiveness of the overall control environment to help protect the assets and reputation of the organisation and help improve its operations.

Group Internal Audit sets an annual plan of work, approved and monitored by the Audit Committee, based on an assessment of both the inherent risk and the adequacy of controls as well as consideration of cyclical coverage.

A report is issued at the conclusion of each audit assignment to relevant senior management, with the results and resolution status of internal audit issues presented regularly to the Audit Committee and management.

The Group Internal Audit function has an audit charter to document its purpose, independence, scope, accountabilities, responsibilities, authorities and standards. The charter is approved by the Audit Committee each year.

The head of the Group Internal Audit function has a direct and unfettered reporting line directly to their respective Audit Committee Chairman and reports functionally through to the Global Head of Internal Audit

## **B.6 Actuarial function**

### **/ Actuarial function**

Solvency II regulation requires insurance and reinsurance companies to provide for an effective actuarial function to:

- a. coordinate the calculation of technical provisions;
- b. ensure the appropriateness of the methodologies and underlying models used as well as the assumptions made in the calculation of technical provisions;
- c. assess the sufficiency and quality of the data used in the calculation of technical provisions;
- d. compare best estimates against experience;
- e. inform the management and the Board of the reliability and adequacy of the calculation of technical provisions;
- f. oversee the calculation of technical provisions;
- g. express an opinion on the overall underwriting policy;
- h. express an opinion on the adequacy of reinsurance arrangements; and
- i. contribute to the effective implementation of the risk-management system, in particular with respect to the risk modelling underlying the calculation of the capital requirements.

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

The Group and local actuarial function prepare an actuarial function report to inform the management and the Board on its conclusions about the reliability and adequacy of the calculation of technical provisions. This report will also provide an overview of the activities undertaken by the actuarial function in each of its areas of responsibility during the reporting period.

The main conclusions of the Actuarial Function report are presented in the Executive Summary of the ORSA report.

In addition to the Actuarial Function role, the Central Bank of Ireland has introduced specific domestic requirements regarding the actuarial function and related governance arrangements which apply to all (re)insurance undertakings subject to Solvency II.

Undertakings are required to notify the Central Bank of the person proposed to take responsibility for the Actuarial Function. Undertakings do this via the Central Bank Fitness & Probity regime where the position is a PCF position, called Head of Actuarial Function (the "HoAF"), and as such, will require Central Bank preapproval before the proposed individual can be appointed to the position. The Central Bank of Ireland has advised that, for AXA, the HoAF and the CRO role cannot be held by the same person.

In that regard, the Central Bank of Ireland requires that undertakings shall appoint a Head of Actuarial Function,

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

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

In addition to, and connected with the AOTPs, the undertaking shall ensure that the HoAF also provides an Actuarial Report on Technical Provisions (the "ARTPs") to the Board on an annual basis, which supports the AOTPs. This report shall also be provided to the Central Bank. The undertaking shall ensure that the HoAF provides an actuarial opinion to the Board in respect of each own risk and solvency assessment ("ORSA") process of the undertaking.

The opinion will address, at a minimum and having regard to the undertaking's individual risk situation, the following:

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

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

## **B.7 Outsourcing**

### **/ Outsourcing arrangements**

Outsourcing by AXA Insurance dac refers to the provision of certain ongoing activities on behalf of the Company by either third-party service providers or other AXA Group companies pursuant to formalised outsourcing service agreements. The AXA Insurance dac Outsourcing and Third-Party Risk Policy describes the mandatory requirements to comply with outsourcing requirements detailed within the Solvency II directives as well as AXA Group Standards and applicable regulation/legislation and requires that material outsourcing relationships with third-party service providers or AXA Group companies are subjected to an appropriate level of due diligence, governance and on-going monitoring. The objective of the policy is to ensure that “AXA Insurance dac does not abdicate responsibility” for the functions outsourced to either AXA Group companies or external third-party service providers and that the risks inherent in the outsourcing of material relationships (i.e., those deemed critical to the principal activities of the business) are identified, monitored and appropriately mitigated. In addition, AXA Insurance dac is subject to regulatory oversight in this area specifically the Central Bank of Ireland’s (“CBI”) Notification Process for (Re)Insurance Undertakings when Outsourcing Critical or Important Functions or Activities under Solvency II, as well as the CBI cross-industry guidance on outsourcing issued in December 2021. The Company has entered contractual outsourcing arrangements with both AXA Group companies and third-party service providers for services required in connection with the day-to-day operation of its businesses. Thorough due diligence and monitoring is conducted regularly to ensure the Company maintains full responsibility over the outsourced functions or activities.

Based on a self-assessment conducted as of year-end 2024, our most significant outsourced activities within the AXA Group relate to the operation of the AXA Insurance dac International Health portfolio, management of the Company’s investment portfolio, IT infrastructure, including the mainframe hosting services for the Company’s core policy and claims administration systems as well as out of hours customer service. Our most significant outsourcing arrangements outside the AXA Group relate to the delegation of underwriting authority to a limited number of Managing General Agents, loss adjusters provided with limited delegated authority to settle claims on behalf of the Company, the operation of the Company’s telephony system, policy administration systems for certain lines of business and the Company’s print and document management/direct mail operations functions. These outsourced activities are primarily located in the following jurisdictions; Republic of Ireland, Northern Ireland and the United Kingdom.

**Table: Critical Outsourced Services - Jurisdictions**

Critical Outsourced Service Category	Total No. Outsourced Providers	Location(s)
Claims Administration	5	ROI, NI, UK
Information Systems, Management & Maintenance	7	ROI, NI, UK, FR
Investment and Asset Management	6	UK, FR
Managed General Agent	3	ROI, NI, FR
Middle and Back Office Operations	2	NI
Total	23	

## **B.8 Any other information**

Not applicable

# Risk Profile/ Foreword/ Solvency II capital position and internal model

AXA's contributions to more inclusive  
and stronger societies



## 03 Raheny Road Race

We have supported the annual Raheny Annual Road Race for many years. It has become one of the premier races in the Republic of Ireland, attracting athletes young and old.

AXA Insurance dac Target Capital  
and Risk Sensitivity

- C.1** Underwriting risk
- C.2** Market risk
- C.3** Credit risk
- C.4** Liquidity risk
- C.5** Operational risk
- C.6** Other material risks
- C.7** Any other information



# C

## C. Risk Profile

### **C.1 Underwriting risk**

Insurance risks

Risk Control and Risk Mitigation

### **C.2 Market risk**

Market Risk Exposure

Risk Control and Risk Mitigation

Governance of Investment strategy and asset & liability management (ALM)

### **C.3 Credit risk**

Risk Control and Risk Mitigation

### **C.4 Liquidity risk**

Liquidity position and Risk Management framework

### **C.5 Operational risk**

General principles

### **C.6 Other material risks**

Strategic risk

Reputation risk

Emerging risks

Group risk

### **C.7 Any other information**

## **/ Foreword**

This section describes the main risks to which AXA Insurance dac is exposed through its business. The business of AXA Insurance dac is to provide protection to its individual or commercial clients including the protection of their properties and liabilities for their personal and business needs. AXA collects premiums from its policyholders and invests the collected premiums for the period between collection and the event that generates a claim or the expiration of the policy.

The Property & Casualty business (P&C) covers a broad range of products and services, including motor, household, property and general liability insurance for both personal and commercial customers.

Insurance is a transaction whereby a client pays a premium or contribution to an insurer to ensure coverage in the event of an insured loss (fire, accident, theft, etc.). All of the premiums collected by the insurer are used to settle the claims filed by its policyholders, as well as its own operating costs. By pooling risks among policyholders, the insurance industry protects them at a reasonable cost. Risk assessment is a key element allowing the insurer to price its risk correctly (the premium), to pool it and to optimise its own operating and administrative costs.

AXA's expertise lies in its ability to assess, mutualise or transfer individual or business risk. In this context, AXA has developed consistent and comprehensive tools to measure and control its main risks as detailed in the below sections.

## **/ Solvency II capital position and internal model**

The Solvency II regime introduces a risk-based capital requirement which can be assessed either using an internal model or a standard formula.

The AXA economic capital model (AXA's Internal Model) aims to cover all the material and quantifiable risks the entity is exposed to. AXA's Internal Model offers a concrete and powerful tool to control and measure exposure to most risks, in line with the Solvency II framework.

The economic capital model is based on a common definition of risks used consistently throughout the AXA Group. It aims to ensure that the Company risk mapping is comprehensive and is followed in a consistent way across the Company and that efficient procedures and reporting are in place so that roles and responsibilities are allocated to identify, measure, monitor, manage and report key risks.

The Group risk grid identifies all material risks applicable for the Company. AXA's economic capital model captures all material risks applicable for the Company in order to assess the different sub risks and the overall aggregation of risks. The underlying methodologies used in the economic capital model are regularly reviewed to ensure that they accurately reflect the AXA Insurance dac risk profile and new methods are developed and integrated regularly (in accordance with the internal model change policy).

AXA's Internal Model is calibrated to represent the value at risk of Group Economic Value at the 99.5<sup>th</sup> percentile over a one-year horizon. In other words, the Solvency Capital Requirement (SCR) is the capital needed to sustain a 1 in 200-year shock, meaning the Company has less than half a percent chance of needing more capital than the SCR in any given year. It strives to include all measurable risks (market, credit, insurance and operational) and reflects AXA's unique diversified profile.

In addition to the risks that result in a SCR through AXA's Internal Model calculation, AXA also considers liquidity risk, reputation risk, strategic risk, Group and regulatory risks as well as emerging threats.

The table below details the Solvency Capital Requirement at AXA Insurance dac level and per Risk category.

**Solvency Capital Requirement - for undertakings on Full Internal Models**  
**Component-specific information**  
**(in Euro million)**

Risk type		Solvency Capital Requirement	Amount modelled	USP	Simplifications
		C0010	C0070	C0090	C0120
Total diversification	R0020	-491,935,261	-		0
Total diversified risk before tax	R0030	467,326,804	-		0
Total diversified risk after tax	R0040	467,326,804	-		0
Total market & credit risk	R0070	246,494,781	-		0
Market & Credit risk - diversified	R0080	111,969,257	-		0
Credit event risk not covered in market & credit risk	R0190	30,440,648	-		0
Credit event risk not covered in market & credit risk - diversified	R0200	30,168,120	-		0
Total Business risk	R0270	-	-		0
Total Business risk - diversified	R0280	-	-		0
Total Net Non-life underwriting risk	R0310	501,707,828	-		0
Total Net Non-life underwriting risk - diversified	R0320	367,681,628	-		0
Total Life & Health underwriting risk	R0400	21,924,317	-		0
Total Life & Health underwriting risk - diversified	R0410	21,924,317	-		0
Total Operational risk	R0480	147,272,478	-		0
Total Operational risk - diversified	R0490	54,209,565	-		0
Other risk	R0500	11,422,014	-		0

**Calculation of Solvency Capital Requirement**

		C0100
Total undiversified components	R0110	959,262,065
Diversification	R0060	-491,935,261
Adjustment due to RFF/MAP nSCR aggregation	R0120	0
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	0
Solvency capital requirement, excluding capital add-ons	R0200	467,326,804
Capital add-ons already set	R0210	0
of which, Capital add-ons already set - Article 37 (1) Type a	R0211	0
of which, Capital add-ons already set - Article 37 (1) Type b	R0212	0
of which, Capital add-ons already set - Article 37 (1) Type c	R0213	0
of which, Capital add-ons already set - Article 37 (1) Type d	R0214	0
Solvency capital requirement	R0220	467,326,804
<b>Other information on SCR</b>		
Amount/estimate of the overall loss-absorbing capacity of technical provisions	R0300	0
Amount/estimate of the loss absorbing capacity for deferred taxes	R0310	0
Capital requirement for duration-based equity risk sub-module	R0400	0
Total amount of Notional Solvency Capital Requirements for remaining part	R0410	0
Total amount of Notional Solvency Capital Requirements for ring-fenced funds	R0420	0
Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	R0430	0
Diversification effects due to RFF nSCR aggregation for article 304	R0440	0
Method used to calculate the adjustment due to RFF nSCR aggregation	R0450	4
Net future discretionary benefits	R0460	0

## Approach to tax rate

Approach based on average tax rate	R0590	1	*Approach based on average tax rate 1 - Yes 2 - No 3 - Not applicable as LAC DT is not used (in this case R0600 to R0690 are not applicable)
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## Calculation of loss absorbing capacity of deferred taxes

		Before the shock	After the shock
		C0110	C0120
DTA	R0600	15,759,019.00	
DTA carry forward	R0610	15,759,019.00	0.00
DTA due to deductible temporary differences	R0620	0.00	0.00
DTL	R0630	3,682,974.00	0.00

		LAC DT
		C0130
Amount/estimate of LAC DT	R0640	0
Amount/estimate of LAC DT justified by reversion of deferred tax liabilities	R0650	0
Amount/estimate of LAC DT justified by reference to probable future taxable economic profit	R0660	0
Amount/estimate of LAC DT justified by carry back, current year	R0670	0
Amount/estimate of LAC DT justified by carry back, future years	R0680	0
Amount/estimate of Maximum LAC DT	R0690	0

## **AXA Insurance dac Target Capital and Risk Sensitivity**

Under the Solvency II regime, AXA Insurance dac is required to hold eligible own funds that cover its Solvency Capital Requirement to absorb significant losses and to be compliant with regulatory requirements. The AXA Insurance dac Solvency Capital Requirement is calibrated so as to ensure that all quantifiable risks to which it is exposed are taken into account.

Under normal conditions, AXA Insurance dac should maintain a Solvency II regulatory ratio above 100%, allowing it to have sufficient eligible own funds to sustain a 1 in 200-year shock.

In addition, to ensure a comfort level over a 100% Solvency II regulatory ratio, AXA Insurance dac monitors its ability to absorb possible severe financial or other shocks. In this context, AXA Insurance dac assess the sensitivities of its Solvency II regulatory ratio to financial shocks on corporate bond spreads, on interest rates, and on equity (as detailed in the figure below). These sensitivity analyses do not take into account pre-emptive management actions that might be taken by the management to mitigate the effects of the defined shocks.

AXA Insurance dac is a subsidiary of the AXA Group under which the Solvency II regime has defined a clear capital management framework. The AXA Group aims at operating with a regulatory Solvency II ratio of 190%. AXA's consolidated Solvency Capital Requirement takes into account the global diversification of risks that exist across all its insurance and reinsurance undertakings, properly reflecting the AXA Group risk exposure. AXA Group also performs, on a regular basis, sensitivity analyses of its Solvency II regulatory ratio to material risks and events, demonstrating that its Solvency ratio is resilient to a wide range of shocks (similar to past major observed events such 2008/2009 financial crisis, 2011 government crisis, 2020 Covid-19 Crisis)

<b>Coverage Ratio post tax</b>	<b>Post Sensitivity Coverage ratio</b>	<b>Difference from actual coverage ratio</b>
+50bps Interest Rate	144%	-2.3%
-50bps Interest Rate	149%	2.4%
+50bps Corporate Spreads	144%	-2.0%
+50bps Government Spreads	140%	-6.5%
+25% Equity Markets	149%	3.2%
-25% Equity Markets	145%	-1.1%

## **C.1 Underwriting risk**

### **/ Insurance risks**

AXA Insurance dac is primarily responsible for managing its insurance risks linked to underwriting, pricing and reserving. It is also responsible for taking appropriate actions in response to changes in insurance cycles and to the political and economic environments in which it operates.

Although the Company underwrites only P&C business, Life risks present within the risk profile of the Company derive from annuities related to the Pension scheme.

In the context of the business of AXA Insurance dac, as described in this report, AXA Insurance dac is exposed to the following main risks: Premium risk due to pricing (risk of undercharging for the potential costs of future claims and expenses of the Company), reserve risk (risk of insufficient reserves on the balance sheet of the Company to cover past claims)

### **/ Risk Control and Risk Mitigation**

Insurance risks for Property & Casualty businesses are covered through 4 major processes, defined at Group level but performed jointly by central and local teams:

- risk controls on new products complementing underwriting rules and product profitability analyses;
- optimising of reinsurance strategies in order to cap local and Group peak exposures thereby protecting its solvency by reducing volatility and to mitigate risk within the Group to benefit from diversification;
- reviewing technical reserves including recent claims trends for AXA Insurance dac;
- monitoring emerging risks to share expertise within the underwriting and risk communities.

### **PRODUCT APPROVAL**

Group Underwriting Office Management (GUO) has defined a set of procedures to approve new products launches. These procedures, that are adapted and implemented locally, foster product innovation across the Group while maintaining control over risks and meet customer needs.

This validation framework notably relies on the results of the economic capital calculation of the AXA economic capital model and ensures that any new products undergo a thorough approval process before they are put to market.

In Property & Casualty, methods are adapted to the underwriting of risks, while maintaining the principle of local decision making based on a documented approval procedure and using the output of the economic capital model. The aim is twofold:

- for pre-launch business, the aim is to ensure that new risks underwritten have been scrutinised before proposing them to customers;
- for post-launch business, appropriate profitability and risk control check that the business remains in line with the Group's risk framework.

This framework complements underwriting rules by ensuring that no risks are taken outside pre-defined tolerances levels and that value is created by adequate risk pricing whilst also providing value to the customer .

### **EXPOSURE ANALYSIS**

For P&C activities, GRM has developed and deployed common models and metrics to consistently measure risks throughout the Group (in particular via its economic capital model framework). This enables Group to check that its exposure complies with risk appetite limits along the dimensions of earnings, value, capital and liquidity. These tools also contribute substantially to monitoring the major risks (claims frequency deviation, claims severity, reinsurance, pricing deviation and natural catastrophes).

This framework is included in the governance set out previously for product development control. Concentration risk studies are developed to ensure no single-peril (i.e. windstorm, earthquake, hurricane or typhoon) might affect the company above the tolerance levels set.

### **REINSURANCE**

Together with the Global business lines, GRM contributes to the placement of Group reinsurance cover. In alignment with Group Standards, AXA Insurance dac reinsurance treaties are placed

through the Global lines, unless a documented approval to place the treaty outside the Group is obtained.

For Property & Casualty operations, reinsurance programs are set up as follows:

- risks are modelled through in-depth actuarial analyses conducted on each portfolio and protected with reinsurance cover in line with the risk appetite limits set at Group level;
- specifically, for P&C natural catastrophe modelling, via the AXA Group Internal Model, GRM uses several external and internal models for assessing the risk associated with the main natural perils (windstorm, flood ...);

### **TECHNICAL RESERVES**

AXA Insurance dac specifically monitors its reserve risks. Claims reserves are firstly estimated and booked on a file-by-file basis by the claims handlers. Additional reserves are also booked by reserving actuaries using various statistical and actuarial methods. These calculations are initially carried out locally by the technical departments in charge and are then reviewed for a second opinion by local Risk Management teams, including AXA UK, and by regularly external technical experts.

Actuaries in charge of assessing reserves notably ensure that:

- A sufficient number of elements have been scrutinised (incl. contracts, premiums and claims patterns, handling, and reinsurance effects);
- The technical assumptions and actuarial methodologies are in line with professional practices and sensitivity analyses are performed at least for most significant ones;
- A roll-forward analysis of reserves, including Boni-Mali back testing, are performed, the regulatory and economic context references are taken into account and material deviations are explained;
- The operational losses relating to the reserving process have been adequately quantified;
- The Best Estimate Liabilities have been calculated in accordance with Articles 75 to 86 of the Solvency II Directive and Group guidelines.

As part of the Solvency II framework, the Head of Actuarial Function for AXA Insurance dac coordinates the calculation of technical provisions ensuring the appropriateness of the methodologies and underlying models used. As part of his annual report, the Head of Actuarial Function also gives an opinion on the overall underwriting policy and on the adequacy of reinsurance arrangements.

## **C.2 Market risk**

### **/ Market Risk Exposure**

AXA Insurance dac is exposed to financial market risks through its core business of P&C insurance whereby the premiums received should be invested in assets of appropriate return, duration and quality to satisfy claims as they fall due, as well as to financial risks arising from its hedging activities. In addition, the Company is exposed to market risks of the Pension Scheme investment portfolio (most notably in respect of corporate bond spread exposure).

### **Description of market risks for Property & Casualty**

The market risks to which Property & Casualty (P&C) portfolios are exposed arise from a variety of factors including:

- An increase in interest rates and spreads of fixed-income investments reduces the market value of fixed-income investments,
- A decline in asset market value (including equity, real estate and alternative investments),
- A change in foreign exchange rates could affect the earnings contribution in euro, which is the reporting currency of AXA Insurance dac; and
- P&C activities are subject to inflation which may increase the compensation payable to policyholders, so that the actual payments may exceed the associated reserves set aside. This risk can be significant for long-tail liabilities and is managed through regular pricing adjustments or specific protections against peaks of inflation.

Sensitivity to corporate spread movements and equities (including private equity) increased over the period due to the increase of underlying exposures. Sensitivity to interest rates and foreign currency movements also increased driven by a larger gap between asset and liability duration as well as a higher quantum of unhedged foreign investments. Movements in other asset classes such as government bonds and real estate moderately reduced as a result of a more diversified portfolio and reductions in the underlying valuations.

For a large proportion of AXA Insurance dac assets, the Investment department utilises the services of asset managers to invest in the market:

- AXA Insurance dac mandates the day-to-day management of its asset portfolios primarily to AXA Investment Managers, whose ownership is expected to move to BNP Paribas around the end of the second quarter of 2025 subject to the receipt of regulatory approvals. The AXA UK & Ireland CIO continuously monitors, analyses, and challenges asset managers' performances for the AXA Insurance dac portfolio.
- In order to benefit from more asset specific and/or geographical expertise, AXA Insurance dac invests through external asset managers. In these cases, thorough due diligence analyses are performed by the Investment and Risk Management communities and continuous monitoring is implemented.

### **/ Risk Control and Risk Mitigation**

AXA Insurance dac is responsible for managing its financial risks (market risk, credit risk, liquidity risk) to ensure it invests in accordance with the 'Prudent Person Principle'. This approach aims to allow swift reaction in an accurate and targeted manner to changes in financial markets or political or economic environments in which the Company operates.

A wide variety of risk management techniques are used to control and mitigate the market risks to which the Company is exposed. These techniques include:

- Asset Liability Management ("ALM"), i.e. defining an optimal strategic asset allocation with respect to the liabilities' structure, to reduce the risk to a desired level,

- A disciplined investment approval process, requiring for any sophisticated investment a formal and thorough analysis by AXA UK & Ireland Investment and Treasury, and a second line opinion by Risk Management,
- Hedging of financial risks when they exceed the tolerance levels set by AXA Insurance dac or by AXA Group in the context of the financial risk appetite framework. This includes a Strategic Hedging Programme (“SHP”) aiming to manage equity and corporate spread risk exposures, hedging of interest rate risk to control the level of risk AXA Insurance dac’s balance sheet is exposed to, as well as a foreign exchange hedging policy which is designed to limit variations in net foreign currency-denominated assets resulting from movements in exchange rates; and
- Regular monitoring of the financial risks on the economic and solvency position of the Company.

## **/ Governance of Investment strategy and asset & liability management (ALM)**

### **Group and Local Guidance on Investments**

Investment & ALM activities are advised by the Chief Investment Officer (CIO) through a delegation given by AXA Insurance dac. The CIO tracks performance of local portfolios, aiming at an optimised risk-return ratio, maintains reporting lines to AXA Group, and manages close relationships with the Chief Risk Officer and Chief Financial Officer of AXA Insurance dac.

### **Group and Local Governance Bodies**

In order to efficiently coordinate local and global investment processes, decisions within the investment community are taken by the Group Investment Committee which is chaired by the Group Chief Financial Officer. This committee defines investment strategies, steers tactical asset allocation, evaluates new investment opportunities and monitors AXA Group’s investment performance;

AXA Insurance dac has a Local Investment and ALM Committee whose terms of reference are approved by the local Board.

This committee is responsible for defining the entity’s Strategic Asset Allocation, approving and monitoring investments, meeting local compliance obligations and approving the participation to investment proposals syndicated by the Group, as well as local investment proposals.

### **ALM Studies and Strategic Asset Allocation**

ALM aims to match the liabilities generated by the sale of insurance policies with the appropriate asset allocation. The objective is to define the optimal asset mix so that all liabilities can be met with the highest degree of confidence while maximising the expected investment return.

ALM studies are performed by the AXA UK & Ireland Investment and Treasury with a second line opinion provided by the Risk Management Function. They use methodologies and modelling tools that develop economic scenarios that take into account existing interaction between assets and liabilities. This process aims at maximising expected returns given a defined level of risk. Furthermore, a series of additional constraints are taken into account, such as Solvency II Internal Model considerations, earnings stability, protection of the solvency margin and preservation of liquidity.

For AXA Insurance dac, the strategic asset allocation is reviewed by local management and presented to the local Investment Committee for approval. The strategic asset allocation allows for taking tactical investment positions within a given leeway.

### **Investment Approval Process**

New investment opportunities, such as non-standard investments, new strategies or new structures, are subject to an Investment Approval Process (“IAP”). The IAP ensures that key characteristics of the investment are analysed, such as risk and return expectations, experience and expertise of the investment management teams, as well as accounting, tax, legal and reputational issues. Each investment opportunity must be approved by the AXA Insurance dac Investment & ALM Committee prior to investment.

The IAP is completed at Group level for any significant investment, notably if several local entities are participating in the same investment. In that case, the completion of an IAP for the local entity is done after the production of a second independent opinion by AXA Group Risk Management (GRM). The IAP is used and completed at the local level to cover local characteristics (including tax and statutory accounting).

### **Hedging of Financial Risks**

Derivatives strategies are used for risk management purposes and are approved and utilized as part of the Risk Appetite set, approved and monitored by the Investment Committee. Any new strategy is systematically reviewed and validated through the IAP arrangements set out in the previous section. In addition, there is a segregation of duties between those responsible for making investment decisions, executing transactions, processing trades and instructing the custodian. This segregation of duties aims in particular to avoid conflicts of interest.

Legal risk is addressed by defining a standardised master agreement. AXA Insurance dac may trade derivatives only if they are covered by legal documentation which complies with the requirements set out in the Group standard. Any change to certain mandatory provisions defined in the Group standards must be approved by GRM.

Additionally, AXA Insurance dac adopts the AXA Group-wide counterparty risk policy, setting out minimum requirements on authorised counterparties, collateral and counterparty exposure limits.

The operational risk related to derivatives is measured and managed in the context of AXA’s global operational risk framework with execution and management of derivatives being centralised within dedicated teams, aiming to reduce AXA Group’s and AXA Insurance dac operational risk.

Valuation Risk is addressed through the use of expert teams which independently counter-value the derivatives positions to ensure appropriate accounting, payment and collateral management. They also challenge the prices proposed by counterparties in case AXA Insurance dac wishes to initiate, terminate early or restructure derivatives.

### **C.3 Credit risk**

Counterparty credit risk is defined as the risk that a third party in a transaction will default on its commitments. Given the nature of its core business activities, AXA Insurance dac monitors three major types of counterparties, using methods suitable to each type:

- investment portfolios including cash and derivative exposures
- ceded risks to reinsurers resulting from reinsurance directly ceded by AXA Insurance dac
- receivables derived from direct insurance operations, including brokers, policyholders and other relevant counterparties.

#### **/ Risk Control and Risk Mitigation**

##### **Invested Assets**

Concentration risk for AXA Insurance dac may arise primarily as a result of an insufficiently diversified portfolio with regard to exposure to single issuer/counterparty, sector and geographic region. Concentration risk is monitored in line with the Group-wide risk appetite framework adjusted appropriately within AXA Insurance dac to take into account local specificities. This includes dedicated credit analysis performed by Group and local teams, a set of limits to ensure appropriate portfolio diversification, as well as a governance framework which ensures that any exposure breaches are identified and resolved on a timely basis.

At AXA Insurance dac level, any breach of limits is presented for remediation at the Investment Committee.

##### **Credit Derivatives**

AXA Insurance dac, as part of its investment and credit risk management activities, uses strategies that involve credit derivatives (mostly Credit Default Swaps, "CDS"), which are mainly used as an alternative to debt security portfolios, when coupled with government debt securities, but also as a protection on single corporate names or specific portfolios.

Limits applied to issuers take into account the credit derivative positions.

Credit risk relating to CDOs (Collateralised Debt Obligations) is monitored separately, depending on the tranches held, and regardless of the type of assets held (debt securities or credit derivatives).

AXA Insurance dac actively manages counterparty risk generated by OTC derivatives through a specific Group-wide policy. This policy includes:

- Rules on derivative contracts (such as International Swaps and Derivatives Association ("ISDA") or Credit Support Annex ("CSA") documentation);
- Mandatory collateralisation;
- A list of authorised counterparties; and
- A limit framework and an exposure monitoring process.

##### **Receivables: Rating Processes and Factors**

The AXA Insurance dac Finance team maintains detailed monthly reporting, ratings and actions across all material Intermediary, Direct and Reinsurance receivable balances. Quarterly Credit Risk Reporting is issued by Finance to key stakeholders, including the local CFO and CRO, and presented to local Executive Risk Committee meetings. Per the most recent report any specific credit risk is adequately provided for.

### **Other receivables**

Receivables risk arises from to the risk of default of counterparties related to insurance operations. The exposures are monitored by the accounting department by nature of counterparties (policyholders, intermediaries, intragroup, taxes, others, etc.) and are actively managed to ensure the correct representation of the risk in the balance sheet on a quarterly basis.

The Risk Management team assesses on an annual basis the capital charge for each type of counterparty, using internal risk factors or standard factors.

## ***C.4 Liquidity risk***

### **/ Liquidity position and Risk Management framework**

Liquidity risk is the risk that AXA Insurance dac will not have the ability to meet its liquidity needs when they fall due.

The company has a strong liquidity position and manages liquidity risk against the Group risk framework, which requires AXA Insurance dac to maintain an appropriate level of liquidity buffer in order to meet liquidity requirements under a combination of extreme stresses occurring simultaneously. Liquidity requirements are assessed over various time horizons most relevant for the Company's liquidity risk profile.

The main liquidity resources are cash, money market instruments and a proportion of assets considered liquid and sellable even in period of distress, including government bonds, high quality corporate bonds in hard currencies and a conservative proportion of listed equities. The main needs come from operating cash flows (including premium, claims and expenses).

As of December 31, 2024, the expected profit included in future premiums as totalled €6.7 million (2023: €6.7 million).

## **C.5 Operational risk**

AXA has defined a framework to identify and measure its operational risks that may arise from a failure in its organisation, systems and resources or from external events. Ensuring an adequate mitigation of these risks across the Group is a key pillar of the Risk Management functions.

### **/ General principles**

One objective of the AXA Insurance dac operational risk economic capital model is to understand and reduce losses resulting from operational failures and to define an appropriate risk response strategy for major Operational risk scenarios.

Based on the Solvency II definition, AXA Insurance dac defines operational risk as the risk of loss arising from inadequate or failed internal processes, personnel or systems or from external events. Operational risk includes legal risks and excludes risks arising from strategic decisions, as well as reputation risks.

AXA has defined a single Group system for identifying, quantifying and monitoring the main operational risks, involving the deployment of a common system, dedicated operational risk teams and a common operational risk typology classifying operational risks into seven risk categories: internal fraud, external fraud, employment practices and workplace safety, clients, products and business practices, damages to physical assets, business disruption and system failures and execution, delivery and process management.

Both quantitative and qualitative requirements are defined.

Across the Group, the most critical operational risks of AXA Insurance dac and set stress scenarios are identified and assessed following a forward-looking and expert-opinion approach. These risk scenarios are then used to estimate the capital requirement needed to cover operational risks based on advanced models using Solvency II principles. The Operational Risk Management process is embedded into local governance through senior management validation to ensure the adequacy, appropriateness and comprehensiveness of the risk assessment but also to ensure that adequate corrective and pre-emptive actions are defined and implemented in front of the main risks; In addition, a loss data collection process is in place within AXA Insurance dac in order to track and appropriately mitigate actual operational risk losses. This process is also used as a valuable source of information to back-test the assumptions taken in risk assessments.

The quantified risk profile is a result of the quantification of 39 individual risks, including any applicable Group Mandatory scenarios and UK Transversal risks. In 2023 AXA Insurance dac quantified 33 risks.

In 2024, the AXA Insurance dac Operational Risk Profile is reasonably well spread out with all seven operational risk categories covered and the main risks being.

Theft of Data from a Third-Party System

Cyber Attack – Data Leakage

Cyber Attack – Malware

Loss of most Critical Building (ROI)

Failure to comply with General Data Protection Regulation (GDPR)

Failure to comply with consumer related risk – CBI

Failure to issue communication material within timeframes (ROI)

Processing errors, reduced controls, missing/incomplete data files in reserving and pricing leading to incorrect rates

Failure in Partnership arrangement – Laya

Budget Overrun in IT & Strategic Transformation

In addition, the Operational Risks quantified were related to Environmental, Social, and Governance (ESG) themes where applicable.

The AXA Insurance dac overall exposure to operational risks is covered by the AXA Solvency Capital Requirement metric.

## **C.6 Other material risks**

## **/ Strategic risk**

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

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

Given the nature of strategic risks, there is no capital charge assessment, but processes are led by Group Strategic Planning (GSP) and AXA Insurance dac Finance department in order to assess, anticipate and mitigate these risks and result in the development and monitoring of recommendations to the local Executive Committee and Risk Committee.

## **/ Reputation risk**

Reputation risk is the risk that an event, internal or external, will negatively influence the stakeholders' perceptions of the Company or where there is a gap between stakeholders' expectation and the Company's behaviours, attitudes, values, actions, or inactions.

AXA has defined a global framework with a two-fold approach to manage and mitigate reputational issues in order to minimise value destruction, to protect and build brand equity and trust among stakeholders.

AXA Insurance dac operates its Reputation Risk Management protocols as part of a wider AXA Group Global Reputation Network. Reputation Risk Management is continuously monitored by the Risk and Compliance Forum and the Risk Committee locally. The objectives of the Reputation Risk Management approach are in line with the AXA overall Enterprise Risk Management approach aiming to develop a reputation risk culture.

Three main objectives drive the Reputation Risk Management approach:

- proactively manage reputation risks, avoid or minimise negative issues impacting on the reputation of AXA and build trust among all of AXA stakeholders.
- clearly define authorities and accountability for reputation risks across the organisation (Marketing, HR, Finance / Investors Relations, etc.), at Group and local levels;
- implement a common Reputation Risk Management Framework throughout the organisation.

The implementation of the Reputation Risk Framework encompasses all AXA activities including insurance, asset management, banking as well as internal service providers.

## **/ Emerging risks**

Emerging risks are risks that could potentially be impactful in the next 5 to 10 years. They are defined as either new risks, or risks that already exist but one or more of the components of the risk's current dynamics are not adequately understood, be it (1) hazard, (2) exposure and/or (3) vulnerability to the hazard.

Some of the characteristics that define emerging risks are:

Significant level of uncertainty is associated with their future impact and likelihood

They are difficult to quantify in terms of frequency and severity of potential losses due to the lack of historical data

Their meaning may not be accurate or well understood

Their consequences and implications can be ambiguous

Their interactions and interconnection with other risks can be complex

No capital charge is held in relation to emerging risks.

AXA Group has established an Emerging Risk Management Framework with the aim to ensure the consistency of a process that will help to identify, assess, mitigate and manage emerging risks that AXA may face. There is a dedicated Emerging Risks team in Group Risk Management. Its main missions are to detect and monitor emerging risks that arise locally and globally, provide support to local Emerging Risks contacts, and share experiences and best practices. The Group Emerging Risks team also leads the annual Emerging Risks Survey.

The Emerging Risk Management Framework encompasses four dimensions:

1. Governance - Annual presentation at AXA Ireland dac Local Executive Committee and quarterly presentation to AXA Ireland dac Risk Committee and Risk and Compliance Forum
2. Risk identification - Annual review of all emerging risks relevant to the AXA Ireland dac Risk Committee (including trend compared to previous year)
3. Risk prioritisation - Prioritization relies on expert judgement from Risk Management, Senior management and Executive Committee. Furthermore, it is based on the identified risks against the survey ranking, severity and time horizon.
4. Mitigation actions - Identification and documentation of already existing mitigation actions and alignment with AXA Ireland Strategy

Emerging risks surveillance is organised through a detection process including watch on scientific publications, court decisions, etc. Risks are monitored and classified within a risk mapping constituted of five sub-groups (1. Society, Politics and Regulatory 2. Environment and Energy, socio & political, 3. Economy, Finance & Business Environment, 4. Medicine & Health I and 5. Technology and Data).

## **/ Group Risk**

While there are benefits of being in a Group, this also impacts the AXA Insurance dac risk profile. AXA Insurance dac is exposed to Group Risk (the risk that the financial or reputational position of a firm may be adversely affected by its relationships with other entities in the same group or by the group itself) arising from its direct and indirect relationships with AXA Group and its entities. These exposures are identified and assessed through the Own Risk and Solvency Assessment process and is subject to ongoing management and monitoring through established controls such as the quarterly Non-Investment Credit Risk Report.

### ***C.7 Any other information***

Not Applicable

# Valuation for Solvency purposes

AXA's contributions to more inclusive and stronger societies



## 04 AXA and Nevo

We're delighted to announce that AXA has teamed up with Nevo as their exclusive insurance partner. Our partnership with Nevo helps us to progress towards our ambition to support customers in their move to more sustainable motoring.

Basis for preparation

- D.1** Assets
- D.2** Valuation of technical provisions and reinsurance recoverables
- D.3** Other liabilities
- D.4** Alternative methods for valuation
- D.5** Any other information

# D

## D. Valuation for Solvency purposes

Basis for preparation

### D.1 Assets

Fair Value Measurement

Intangible Assets

Property, Plant & Equipment held for own use

Investments and loans

Equities

Debt Instruments

Investment Funds

Derivative instruments

Cash and Cash equivalents

Deferred taxes

Leasing arrangements

### D.2 Valuation of technical provisions and reinsurance recoverables

General principles

Best Estimate Liabilities

Risk Margin

Reinsurance & Special purpose vehicles recoverables

### D.3 Other liabilities

Contingent liabilities

Subordinated Debt

Derivative instruments

Provisions other than technical provisions

Pension benefit obligations

Deferred taxes

Financial liabilities

Leasing arrangements

Other assets and liabilities

### D.4 Alternative methods for valuation

### D.5 Any other information

## ***Basis for preparation***

The AXA Insurance dac Solvency II balance sheet is prepared as of December 31, 2024. The balance sheet is prepared in compliance with the Solvency II Regulations.

Assets and liabilities are valued based on the assumption that the Company will pursue its business as a going concern.

The Solvency II balance sheet only includes the value of business in force together with bound but not incepted business.

Technical provisions are recognised with respect to all the insurance and reinsurance obligations towards policyholders and beneficiaries of insurance or reinsurance contracts. The value of technical provisions corresponds to the current amount that the Company would have to pay if it was to transfer its insurance and reinsurance obligations immediately to another insurance or reinsurance undertaking.

Other assets and liabilities are recognised in compliance with IFRS standards and interpretations of the IFRS Interpretations Committee that are endorsed by the European Union before the balance sheet date with a compulsory date of January 1, 2016, provided that those standards and interpretations include valuation methods that are in accordance with the following market consistent valuation approach set out in Article 75 of the Solvency II Directive 2009/138/EC:

- Assets shall be valued at the amount for which they could be exchanged between knowledgeable willing parties in an arm's length transaction;
- Liabilities shall be valued at the amount for which they could be transferred, or settled, between knowledgeable willing parties in an arm's length transaction (without adjustment to take account of the Company own credit standing).

The main adjustments between local statutory GAAP and Solvency II assets and liabilities relate to:

- The re-measurement of the market value of assets, related to the recognition of unrealised gain and losses of assets, recognised at cost in the statutory Balance Sheet,
- The re-measurement in the Solvency II framework of policyholder's reserves as compared to those of the Statutory Balance Sheet, for the liabilities side.

Other adjustments come from the removal of intangibles within the Solvency II balance-sheet.

These adjustments are detailed hereafter in this section.

The preparation of the balance sheet in accordance with Solvency II requires the use of estimates and assumptions. It requires a degree of judgment in the application of Solvency II principles as described below. The main balance sheet captions concerned are assets accounted for at fair value, deferred tax assets, assets and liabilities relating to the insurance business, pension benefit obligations and balances related to share-based compensation. The principles set out below specify the measurement methods used for these items.

Unless otherwise stated, AXA's valuation principles have been consistently applied to all the periods presented.

The Solvency II balance sheet is presented in Euro, it being the Company's presentational currency. Assets and liabilities resulting from transactions denominated in foreign currencies are translated at the year-end exchange rate.

## D.1 Assets

### / Fair Value Measurement

The table below summarises for each material class of assets, the value of the assets of the Company according to Solvency II provisions together with the values of the assets recognised and valued on a statutory account basis as at December 31, 2024:

<i>(in Euro million)</i>	<b>Fair Value</b> (Solvency II)	<b>Carrying Value</b> (IFRS)	<b>%</b> <b>(Solvency II)</b>
Goodwill	-	-	0.0%
Deferred acquisition costs	-	-	0.0%
Intangible assets	1	11	0.0%
Deferred tax assets	16	8	0.6%
Pension benefit surplus	-	66	0.0%
Property, plant & equipment held for own use	57	38	2.0%
<b>Investments (other than assets held for index-linked and unit-linked contracts)</b>	<b>2,350</b>	<b>2,350</b>	<b>83.6%</b>
Investment in real estate properties	-	-	0.0%
Holdings in related undertakings, including participations	-	-	0.0%
Equities	60	60	2.1%
Debt Instruments	1,740	1,740	61.9%
Investment funds	503	503	17.9%
Derivatives	47	47	1.7%
Other investments	-	-	0.0%
<b>Assets held for index-linked and unit-linked contracts</b>	<b>-</b>	<b>-</b>	<b>0.0%</b>
<b>Loans and mortgages</b>	<b>98</b>	<b>98</b>	<b>3.5%</b>
<b>Reinsurance recoverables</b>	<b>63</b>	<b>71</b>	<b>2.3%</b>
<b>Deposits to cedants</b>	<b>39</b>	<b>39</b>	<b>1.4%</b>
<b>Receivables</b>	<b>108</b>	<b>277</b>	<b>3.8%</b>
<b>Cash and cash equivalents</b>	<b>80</b>	<b>80</b>	<b>2.8%</b>
Other	0	0	0.0%
<b>TOTAL ASSETS</b>	<b>2,812</b>	<b>3,039</b>	<b>100.0%</b>

*The fair value measurement is consistent with the one defined in the Solvency II regulation*

The Company applies the IFRS 13 fair value measurement as described below for all assets and liabilities (excluding technical provisions). This fair value measurement is consistent with the one defined in the Solvency II regulation.

#### a) Active market: quoted price

Fair values of assets and liabilities traded on active markets are determined using quoted market prices when available. An instrument is regarded as quoted in an active market if quoted prices are readily and regularly available from an exchange, dealer, broker, industry group, pricing service or regulatory agency and those prices represent actual and regularly occurring market transactions on an arm's length basis between a willing seller and a willing buyer. For financial instruments traded in active markets, quotes received from external pricing services represent consensus prices, i.e. using similar models and inputs resulting in a very limited dispersion.

#### b) Active versus inactive markets – financial instruments

Equity instruments quoted on exchange traded markets and bonds actively traded on liquid markets for which prices are regularly provided by external pricing services that represent consensus with limited dispersion and for which quotes are readily available are generally considered as being quoted in an active market. Liquidity may be defined as the possibility to sell or dispose of the asset in the ordinary course of business within a certain limited time period at approximately the price at which the investment is valued. Liquidity for debt instruments is assessed using a multi criteria approach including the number of quotes available, the place of issuance and the evolution of the widening of bid ask spreads.

A financial instrument is regarded as not quoted in an active market if there is little observation of transaction prices as an inherent characteristic of the instrument, when there is a significant decline in

the volume and level of trading activity, in case of significant illiquidity or if observable prices cannot be considered as representing fair value because of dislocated market conditions. Characteristics of inactive markets can therefore be very different in nature, inherent to the instrument or indicative of a change in the conditions prevailing in certain markets.

**c) Assets and liabilities not quoted in an active market**

The fair values of assets and liabilities that are not traded in an active market are estimated:

- Using external and independent pricing services; or
- Using valuation techniques

External pricing services may be fund asset managers in the case of investments in funds. To the extent possible, the Company collects quotes from external pricing providers as inputs to measure fair value. Prices received may form tight clusters or dispersed quotes which may then lead to the use of valuation techniques. The dispersion of quotes received may be an indication of the large range of assumptions used by external pricing providers given the limited number of transactions to be observed or reflect the existence of distress transactions.

**/ No active market: use of valuation techniques**

The objective of valuation techniques is to arrive at the price at which an orderly transaction would take place between market participants (a willing buyer and a willing seller) at the measurement date.

Valuation technique models include:

- Market approach: The consideration of recent prices and other relevant information generated by market transactions involving substantially similar assets or liabilities.
- Income approach: Use of discounted cash flow analysis, option pricing models, and other present value techniques to convert future amounts to a single current (i.e. discounted) amount.
- Cost approach: The consideration of amounts that would currently be required to construct or replace the service capacity of an asset.

Valuation techniques are subjective in nature and significant judgment is involved in establishing fair values. They include recent arm's length transactions between knowledgeable willing parties on similar assets if available and representative of fair value and involve various assumptions regarding the underlying price, yield curve, correlations, volatility, default rates and other factors. Unlisted equity instruments are based on cross checks using different methodologies such as discounted cash flows techniques, price earnings ratios multiples, adjusted net asset values, taking into account recent transactions on instruments which are substantially the same if concluded at arm's length between knowledgeable willing parties, if any. The use of valuation techniques and assumptions could produce different estimates of fair value. However, valuations are determined using generally accepted models (discounted cash flows, Black & Scholes models, etc.) based on quoted market prices for similar instruments or underlying (index, credit spread, etc.) whenever such directly observable data are available, and valuations are adjusted for liquidity and credit risk.

Valuation techniques may be used when there is little observation of transaction prices as an inherent characteristic of the market, when quotes made available by external pricing providers are too dispersed or when market conditions are so dislocated that observed data cannot be used or need significant adjustments. Internal 'mark-to-model' valuations are therefore normal market practice for certain scarcely traded or exceptional assets and liabilities.

**/ Use of valuation techniques in dislocated markets**

The dislocation of certain markets may be evidenced by various factors, such as;

- very large widening of bid ask spreads which may be helpful indicators in understanding whether market participants are willing to transact,
- wide dispersion in the prices of the small number of current transactions,
- varying prices over time or among market participants, inexistence of secondary markets,
- disappearance of primary markets,
- closing down of dedicated desks in financial institutions,
- distress and forced transactions motivated by strong needs of liquidity or other difficult financial conditions implying the necessity to dispose of assets immediately with insufficient time to market the assets to be sold, and
- large bulk sales to exit such markets at all costs that may involve side arrangements (such as sellers providing finance for a sale to a buyer).

Primary transactions' prices in markets supported by government through specific measures following the financial crisis do not represent fair value.

In such cases, the Company uses valuation techniques including observable data whenever possible and relevant, adjusted if needed to develop the best estimate of fair value, including adequate risk premiums or develops a valuation model based on unobservable data representing estimates of assumptions that willing market participants would use when prices are not current, relevant or available without undue costs and efforts: in inactive markets, transactions may be inputs when measuring fair value, but would likely not be determinative and unobservable data may be more appropriate than observable inputs.

### **/ Intangible Assets**

Under Solvency II, only intangible assets related to the in force, that are separable and for which there are evidence of exchange transactions for the same or similar assets, indicating they are saleable in the marketplace, are recognised.

As a result of Solvency II principles, intangible assets, including DAC, recognised under IFRS have no value in the Solvency II balance sheet.

### **/ Property, Plant & Equipment held for own use**

Under Solvency II, property, plant & equipment held for own use is recognised at fair value whereas under IFRS, it is recognised at cost. Asset components are depreciated over their estimated useful lives and reversible impairment is recognised if conditions are met. When an asset is intended to be sold within twelve months, it is measured at the lower of net carrying value and fair value net of selling costs.

### **/ Investments and loans**

The investments aggregate on the Solvency II balance sheet include investment in real estate properties (other than for own use), participations (including entities other than investment funds that are accounted for under the equity method), equity instruments, bonds, investment funds, derivatives and deposits other than cash equivalents.

In relation to Loans and Mortgages, the material element relates to inter group exposures.

Under Solvency II, financial assets are recognised at fair value.

### **/ Equities**

Under both IFRS and Solvency II, equities are recognised at fair value.

### **/ Debt Instruments**

Under both IFRS and Solvency II, debt instruments are recognised at fair value.

### **/ Investment Funds**

Under both IFRS and Solvency II, investment funds are recognised at fair value.

### **/ Derivative instruments**

Under both IFRS and Solvency II, derivatives are recognised at fair value.

### **/ Cash and Cash equivalents**

Under both IFRS and Solvency II, cash and cash equivalents are recognised at fair value.

### **/ Deferred taxes**

Please refer to section D.3.

## **/ Leasing arrangements**

The Company accounts for leases under IFRS 16. The Company recognises a right-of-use asset and related lease liability. The Company has not availed of the short-term lease exemption electing to recognise right of use assets and liabilities for leases where the total lease term is less than or equal to 12 months.

## **/ Receivables**

Loans are initially recognised at cost, which is the fair value of the consideration paid for the acquisition of the investment and transaction costs directly attributable to the acquisition of the investment; and subsequently measured at amortised cost using the effective interest rate method with gains and losses recognised in the profit and loss account.

Under Solvency II, reinsurance receivables take account for reinsurance credit default. For policyholder receivables this reflects cash flow receipt within the Solvency II balance sheet.

## D.2 Valuation of technical provisions and reinsurance recoverables

### / General principles

Technical provisions are measured using a two “building blocks” approach:

- Best Estimate Liabilities (BEL), and
- Risk margin for non-hedgeable risks that is added to the best estimate liabilities.

The best estimate liability corresponds to the probability-weighted average of future cash flows, including claims payments, expenses, taxes, premiums related to existing insurance and reinsurance contracts taking into account the time value of money (i.e. by discounting these future cash flows to present value). The calculation of the best estimate liability is based upon up-to-date reliable information and realistic assumptions. The cash-flow projection used in the calculation includes all the cash in-flows and out-flows required to settle the insurance and reinsurance obligations over their lifetime.

The best estimate liability is recognised on a gross of reinsurance basis, without deduction of amounts recoverable from reinsurance contracts and special purpose vehicles. The latter are recognised separately.

The risk margin is defined as the cost of non-hedgeable risk, i.e. a margin in addition to the expected present value of liability cash flows required to manage the business on an on-going basis. It is deemed to be the present value of the cost of future economic capital requirements for non-hedgeable risks.

This valuation requires deep analysis of the underlying obligations, collection of qualitative and quantitative information, projection tools and models, and expert judgment in a number of areas.

The table below summarises the AXA Insurance dac technical provisions under Solvency II together with a comparison on a local statutory accounting basis.

Euro millions

	Fair Value (Solvency II)	Carrying Value (IFRS)
<b>Technical Provision - non life</b>	<b>1,832</b>	<b>2,023</b>
<b>Material lines of business</b>		
<b>Motor Vehicle Liability insurance - Technical Provisions</b>	<b>1,459</b>	<b>1,562</b>
Best Estimate	1,420	1,517
Risk Margin	40	45
<b>Other Motor insurance - Technical Provisions</b>	<b>67</b>	<b>107</b>
Best Estimate	64	107
Risk Margin	3	1
<b>Fire and Other Damage to Property insurance - Technical Provisions</b>	<b>157</b>	<b>191</b>
Best Estimate	154	188
Risk Margin	4	3
<b>General Liability insurance - Technical Provisions</b>	<b>106</b>	<b>114</b>
Best Estimate	104	110
Risk Margin	2	3
<b>Miscellaneous Financial Loss</b>	<b>3</b>	<b>4</b>
Best Estimate	3	3
Risk Margin	0	0
<b>Medical</b>	<b>38</b>	<b>42</b>
Best Estimate	38	41
Risk Margin	-	1

## **/ Best Estimate Liabilities**

A best estimate assumption is defined as one where there is as much probability that the actual experience develops over the assumption as below it. It is neither a prudent nor an optimistic assumption. It is set at a level that is neither deliberately overstated nor deliberately understated. Due to the inherent uncertainties, if two assumptions are equally reasonable the average is used.

## **/ Assumptions and framework**

Non market assumptions, based on latest best estimate assumptions (historical data and expert judgment), include the loss ratio and best estimate claims payment.

Assumptions regarding future experience are reasonable, and, to the extent possible, take into account the actual historical and current experience of the Company, adjusted to reflect known changes in the environment and identifiable trends. In some instances, it may be necessary to rely more on judgment, taking into consideration the Company's pricing and/or reserving assumptions.

Assumptions are used to project future cash flows and are therefore selected with due regard to the future context or expected future operating environment of the Company. Thus, they may or may not be consistent with past experience.

The development of future experience will depend on the context and the risk characteristics of the products. Setting corresponding assumptions requires a sound knowledge of the current and projected policies by management in charge of investment, underwriting, reinsurance, claim settlement, marketing, pricing, actuarial and administration. The impact of the external environment on the future cash flows is also taken into account. Specific consideration is given to economic factors such as inflation or recession as well as the regulatory, legal and political environments.

Assumptions are consistent with the best estimates used for other purposes such as Statutory, IFRS, or GAAP reporting and product pricing.

Assumptions in respect of best estimate metrics are derived consistently over time and within homogeneous risk groups and lines of business. The assumptions adequately reflect any uncertainty of the cash flows.

Assumptions are reviewed and potentially adjusted in the light of the recent experience.

## **/ Specificities of some assumptions**

### **Expenses**

Expenses include administrative expenses, investment management expenses, claims management expenses and acquisition expenses which relate to recognised insurance and reinsurance obligations. The assumptions underlying expenses projections are consistent with the strategy of the Company, taking into account future new business and any change in the expenses agreed by the management. Expenses are inflated over the duration of the projection. The inflation assumption is assessed on the basis of the economic environment and the specifics of the Company, and generally varies across economic scenarios.

### **Boundary of an insurance or reinsurance contract**

The Solvency II balance sheet excludes all premiums expected from new business not yet bound and future premiums expected from existing contracts if the Company has the power to either reject them or fully re-price them. All cash flows in respect of business which is legally bound are included in the technical provisions.

### **Reference rate curve and stochastic scenarios**

Discount rates used for non-life reserves are base risk-free rates. (No volatility adjustment used locally)

## **Non-life Best Estimate Liabilities**

Non-life Best Estimate Liabilities (BEL) represent expected future cash flows discounted to take into account the time value of money for non-life obligations and do not generally require stochastic projections and dynamic assumptions.

The valuation of non-life technical provisions is based on the application of a wide range of actuarial projection models, including a balanced mix of the following elements:

- Portfolio's main features in terms in particular of risks mapping, underwriting and claims policies, social, economic and legal context, local requirements (such as statutory, accounting, tax...), market conditions and claimants' behaviours;
- Quality, relevance and consistency over time of available statistical data;
- Consistency and limits of the set of selected forecasting methods, given the business features and the available data;
- Selection of relevant actuarial assumptions sets and their adequate application to actuarial projection models;
- Ability to economically document the projected range of results, both quantitatively and qualitatively;

The Company applies a wide range of actuarial and statistical methods. Analyses are performed by lines of business and projections are performed using tools developed either internally or externally. Non-life technical provisions are valued based on internally modelled run-offs projected out flows on the basis of past payment patterns adjusted whenever relevant. A number of adjustments are applied to the statutory technical provisions to determine the Solvency II technical provisions.

### **Unearned premium reserves**

In addition to the valuation above, the non-life BEL includes the adjusted valuation of the accounting unearned premium reserves that aim to cover the unexpired risk period for which the Company received a premium.

Under Statutory GAAP, unearned premium reserves are usually based on a prorata of premiums received related to the unexpired period of coverage plus an amount to cover deficiencies when the combined ratio based on technical reserves is higher than 100% (net of reinsurance).

Under Solvency II, such reserves result from the application of an expected combined ratio to the proportion of the premiums related to the unexpired period, even when this loss ratio is lower than 100%

### **/ Risk Margin**

In addition to the best estimate liabilities (BEL), a risk margin is recognised to obtain values consistent with the determination of market prices when there are no deep and liquid markets. The risk margin is defined as the cost of non-hedgeable risk, i.e. a margin in addition to the expected present value of liability cash flows required to manage the business on an ongoing basis. In general, most insurance risks (e.g. mortality or property risks) are deemed to be non-hedgeable risks.

The non-hedgeable risks comprise:

- Property & Casualty,
- Reinsurance default risks and
- Operational risks.

The Solvency Capital Requirement (SCR) for the non-hedgeable risks is projected for the future years until the run-off of the portfolio following suitable risk driver.

The risk margin is determined as the present value at the basic risk-free interest rate structure of the future capital charges using a 6% cost of capital for all lines of business.

The cost of capital is a premium over the risk-free rate that represents the reduction in economic "value" (cost) linked to the risks considered.

### **Reinsurance & Special purpose vehicles recoverables**

As technical provisions are reported gross of reinsurance, a reinsurance asset is identified separately. Transactions related to reinsurance assumed and ceded are accounted for in the balance sheet in a similar way to direct business transactions in agreement with contractual clauses. Indeed, the methods used to value reinsurance balances depend on the type of reinsurance contracts (e.g. treaties / facultatives, proportional/non-proportional), the nature of the business and the ceded portion.

At year end 2023 AXA Insurance dac had no special purpose vehicle recoverables.

### **D.3 Other liabilities**

The table below summarises AXA Insurance dac other liabilities under Solvency II together with a comparison on a local statutory account basis as of December 31, 2025.

<i>(in Euro million)</i>	<b>Fair Value (Solvency II)</b>	<b>Carrying Value (IFRS)</b>
Contingent liabilities	-	-
Technical provisions	1,832	2,023
Provisions other than technical provisions	8	8
Pension benefit obligations	-	-
Deposits from reinsurers	-	-
Deferred tax liabilities	4	4
Derivatives	49	49
Debts owed to credit institutions	-	-
Financial liabilities other than debts owed to credit institutions	19	19
Payables	152	156
Subordinated liabilities	-	-
Other	65	65
<b>Total Liabilities</b>	<b>2,130</b>	<b>2,325</b>

#### **/ Contingent liabilities**

Contingent liabilities are:

- Possible obligations that arise from past events and whose existence will be confirmed only by the occurrence or non-occurrence of one or more uncertain future events not wholly within the control of the entity or
- Present obligations that arise from past events but for which it is not probable that an outflow of resources embodying economic benefits will be required to settle the obligation.

Under Solvency II, contingent liabilities that are material are recognised as liabilities. Contingent liabilities are material where information about the current or potential size or nature of those liabilities could influence the decision-making or judgment of the intended user of that information, including the supervisory authorities.

The value of contingent liabilities is equal to the expected present value of future cash flows required to settle the contingent liability over the lifetime of that contingent liability, using the basic risk-free interest rate term structure.

AXA Insurance dac has no contingent liabilities as of December 31, 2024.

#### **/ Subordinated liabilities**

Under both IFRS and Solvency II, subordinated liabilities are recognised at fair value. AXA Insurance dac has no subordinated liabilities as of December 31, 2024.

#### **/ Derivative instruments**

See section D.1

## **/ Provisions other than technical provisions**

The same approach prevails under both IFRS and Solvency II frameworks.

Provisions are recognised when the Company has a present obligation as a result of past events, when it is probable that an outflow of resources will be required to settle the obligation, and when the provision can be reliably estimated. Provisions are not recognised for future operating losses. Provisions are measured at management's best estimate, at the balance sheet date.

## **/ Pension benefit obligations**

The same approach prevails under both IFRS and Solvency II frameworks. Pension benefit obligations are valued under IAS 19 (IFRS) for Solvency II and IFRS.

Pension benefit obligations include the benefits payable to AXA employees after they retire (retirement compensation, additional pension benefit, health insurance). In order to meet those obligations, some regulatory frameworks have allowed or enforced the set-up of dedicated funds (plan assets).

- Defined contribution plans: payments are made by the employer to a third party (e.g., pension trusts). These payments free the employer of any further commitment, and the obligation to pay acquired benefits to the employees is transferred. No liability needs to be recorded once contributions are made.
- Defined benefit plans: an actuarial assessment of the commitments based on each plan's internal rules is performed. The present value of the future benefits paid by the employer, known as the DBO (Defined Benefit Obligation), is calculated annually on the basis of long-term projections of rate of salary increase, inflation rate, mortality, staff turnover, pension indexation and remaining service lifetime. The amount recorded in the balance sheet for employee defined benefit plans is the difference between the present value of the Defined Benefit Obligation and the market value at the balance sheet date of the corresponding invested plan assets after adjustment for any minimum funding requirement or any asset ceiling effect. If the net result is positive, a provision is recorded. If the net result is negative, a prepaid pension asset is recorded in the balance sheet but not more than its recoverable amount (asset ceiling).

## **/ Deferred taxes**

Differences arise between IFRS and Solvency II deferred taxes balances due to differences in underlying principles for assets and liabilities. Indeed, there are generally tax impacts on adjustments between IFRS and Solvency II assets and liabilities.

However, similar recognition and valuation principles apply under both IFRS and Solvency II frameworks.

Deferred tax assets and liabilities emerge from temporary differences with tax values of assets and liabilities, and when applicable from unused tax losses or tax credits carried forward. Deferred tax assets are recognised to the extent that it is probable that future taxable profits will be available to offset the temporary differences, taking into account the existence of tax groups and any legal or regulatory requirements on the limits (in terms of amounts or timing) relating to the carry forward of

unused tax losses or the carry forward of unused tax credits. The recoverability of deferred tax assets recognised in previous periods is re-assessed at each closing.

The measurement of deferred tax liabilities and deferred tax assets reflects the expected tax impact, at the balance sheet date that would follow the way the Company expects to recover or settle the carrying amount of its assets and liabilities.

Under International Accounting Standard (IAS) 12, the ability to offset deferred tax assets against deferred tax liabilities is only provided for where they are of similar maturity date and similar income tax nature.

The offsetting of deferred tax assets against deferred tax liabilities is performed only if the conditions below are met:

The reporting or taxable entity has a legally enforceable right to set off current tax assets against current tax liabilities; and

The deferred tax assets and deferred tax liabilities relate to income taxes levied by the same taxation authority on either the same taxable entity or different taxable entities which intend either to settle current tax liabilities and assets on a net basis, or to realize the assets and settle the liabilities simultaneously, in each future period in which significant amounts of DTL or DTA are expected to be settled or recovered.

Based on this, where there is a deferred tax asset in the Northern Ireland Branch of AXA Insurance dac it should not be offset against any deferred tax arising in the Republic of Ireland. We have separate deferred tax liabilities and deferred tax asset entries in the Solvency II Balance Sheet.

As of 31 December 2024, a net deferred tax asset position of €8.45 million and negative net deferred tax asset (i.e. net DTL) position of €3.57 million (resulting in a net positive balance sheet position of €12.9 million) have been recognised in the Solvency II balance sheet. The net deferred tax asset is regarded as recoverable and therefore recognised in line with Article 15 on the basis of all available evidence, that it can be regarded as more likely than not that there will be future taxable profits available against which the temporary differences can be utilised. The net deferred tax asset is deemed available as basic own-fund items Tier 3 (restricted) in accordance with Article 76(a)(iii).

AXA Insurance dac holds both a net deferred tax asset and a negative net deferred tax asset, resulting in a positive net deferred tax asset. The Solvency Capital Requirement (SCR) is adjusted for the loss absorbing capacity of deferred taxes. As of December 31, 2024, this is equal to zero as the loss absorbing capacity of deferred taxes may not reduce the solvency capital requirement. Where the deferred tax liability is negative then this would be deducted directly from the solvency capital requirement.

## **/ Financial liabilities**

Financial Liabilities other than debts owed to credit institutions consist of amounts payable in respect of lease liabilities.

## **/ Leasing arrangements**

The Company accounts for leases under IFRS 16. The Company recognises a right-of-use asset and related lease liability. The Company has not availed of the short-term lease exemption electing to recognise right of use assets and liabilities for leases where the total lease term is less than or equal to 12 months.

## **/ Other assets and liabilities**

Under Solvency II, reinsurance receivables are adjusted from their IFRS value to take into account the expected losses due to the probability of default of the counterparty.

With regard to share-based compensation plans, the same approach prevails under both IFRS and Solvency II frameworks. The Company's share-based compensation plans are predominantly settled in equities. These plans, by nature, do not have an impact on assets and liabilities except for the related tax effect; cash-settled share-based compensation plans are recognised at fair value, which is re-measured at each balance sheet date.

With the exception of collateral pledged, to cover derivative exposures, assets of the company are free of charges exercisable by third parties.

All other assets and debts (tangibles assets and other long-term assets) are also recorded at fair value under Solvency II equating to carrying value under IFRS.

#### ***D.4 Alternative methods for valuation***

For detailed information on alternative methods used for valuation of assets and other liabilities, please refer to the subsection Fair Value Measurement in section D1.

For detailed information on alternative methods used for valuation of liabilities other than technical provisions, please refer to the section D3.

#### ***D.5 Any other information***

As at year end 2024 AXA Insurance dac does not use matching adjustment, volatility adjustment or transitional risk-free interest rate structure.

# Capital Management

AXA's contributions to more inclusive and stronger societies



## 05 AXA Ireland Fund

The AXA Ireland Fund has been created to support communities and non-profit enterprises and organisations who address key social issues. This year funding will focus on **Empowering Women**.

- E.1** Own funds
- E.2** Solvency capital requirement and minimum capital requirement
- E.3** Use of the duration-based equity risk sub-module in the calculation of the Solvency Capital Requirement
- E.4** Differences between the standard formula and any internal model used
- E.5** Non-compliance with the Minimum Capital Requirement and non-compliance with the Solvency Capital Requirement
- E.6** Any other information

E

## **E. Capital Management**

### **E.1 Own funds**

Capital Management Objectives

Information on Capital structure

Change in Capital resources

Tiering Analysis of capital

Reconciliation to IFRS shareholders' equity

### **E.2 Solvency capital requirement and minimum capital requirement**

General principles

Solvency Capital Requirement

Minimum Capital Requirement

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

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

General information

Main differences between the Standard Formula and the Internal Model

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

### **E.6 Any other information**

## E.1 Own funds

### / Capital Management Objectives

AXA Insurance dac reviewed its capital resources and requirements on an economic basis as at the end of 2023. In performing this review, both Regulatory requirements and Management's internal objectives, including ability to meet key shareholder's requirements, have been considered.

The local Executive Management Committee regularly reviews the adequacy of the Risk Management system and processes and has regular processes in place to identify and prioritise opportunities for further developing the Risk Management capabilities.

Management monitors the Company's solvency margin on an on-going basis. AXA Insurance dac regularly monitors its exchange rate hedging strategy and will continue to review its effectiveness and the potential need to adapt it taking into account impacts on earnings, value, solvency, gearing ratio and liquidity.

AXA Insurance dac have in place a local Capital Management Policy and review information over the company planning horizon (generally 3-5 years).

### / Information on Capital structure

As of December 31, 2023, Eligible own Funds (EoF) totalled €683.

The capital resources at December 31, 2024 and December 31, 2023 are presented in the table below:

<i>(in € million)</i>	<b>At December 31, 2024</b>	<b>At December 31, 2023</b>	<b>Evolution</b>
Share capital	42	42	-
Capital in excess of nominal value	31	31	-
Dated subordinated debt	-	-	-
Reconciliation reserve	526	445	81
An amount equal to the value of net deferred tax assets	12	4	8
Other own fund items approved by the supervisory authority as basic own funds not specified above	72	72	-
<b>Total Eligible own Funds (EoF)</b>	<b>683</b>	<b>594</b>	<b>89</b>

Reconciliation reserve represents the excess of asset over liabilities from the Solvency II balance sheet, reduced by capital items in the financial statements (share capital, capital in excess of nominal value, Capital Contributions). The Directors are satisfied that there is sufficient capital from a solvency perspective and sufficient distributable reserves on an IFRS basis to propose these distributions.

## / Change in Capital resources in 2024

### Eligible own Funds (EoF)

At December 31, 2024

<i>(in € million)</i>	At December 31, 2024
<b>EoF FY 2023</b>	<b>594</b>
Modelling changes and opening adjustments	0
Total Return	100
Others	(11)
<b>EoF FY 2024</b>	<b>683</b>

In 2024 the post-tax Eligible own Funds (EOF) increased from €594m to €683.

All relevant adjustments above are net of tax.

## / Tiering Analysis of capital

### Capital by tier

Solvency II Eligible own Funds (EoF) available to the undertaking before any consideration for tiering eligibility restriction and after limitation over the potential non-availability of certain elements of capital.

Eligible own funds are split into tiers, i.e. three different buckets of capital determined according to the quality of such components as defined in the Solvency II Regulation. Eligibility limits apply to those available elements to cover respectively the Solvency Capital Requirement (SCR) or the Minimum Capital Requirement (MCR) and technical provisions.

As far as compliance with the Solvency Capital Requirement is concerned, the following quantitative limits shall apply:

- (a) the eligible amount of Tier 1 items shall be at least one half of the Solvency Capital Requirement;
- (b) the eligible amount of Tier 3 items shall be less than 15 % of the Solvency Capital Requirement;
- (c) the sum of the eligible amounts of Tier 2 and Tier 3 items shall not exceed 50 % of the Solvency Capital Requirement.

EoF is the eligible own fund amount after the tiering limits are applied. The structure of tiering is presented in the table below:

<i>(in Euro million)</i>	Total	Unrestricted Tier 1	Restricted Tier 1	Tier 2	Tier3
<b>EoF (Eligible own Funds) at December 31, 2024</b>	<b>683</b>	<b>671</b>	-	-	<b>12</b>
Of which ancillary	-	-	-	-	-
Of which subject to transitional measures	-	-	-	-	-

As far as compliance with the Minimum Capital Requirements is concerned, the following quantitative limits shall apply: (a) the eligible amount of Tier 1 items shall be at least 80 % of the Minimum Capital Requirement; (b) the eligible amounts of Tier 2 items shall not exceed 20 % of the Minimum Capital Requirement.

In accordance with the methods of calculation implemented by AXA in line with existing regulations, the AXA Insurance dac eligible financial resources to cover the solvency capital requirement under the current Solvency II regime amounted to €683m at December 31, 2024. Similarly, there are €671m of eligible financial resources to cover the minimum capital requirement, this is due to there being €12m of Tier 3 eligible financial resources.

## **Dated and undated subordinated debts description**

The company has not issued dated or undated subordinated debt.

## / Reconciliation IFRS / Solvency II shareholders' equity

As of December 31, 2024, solo IFRS shareholder's equity totalled €683m. The reconciliation movements in capital resources between the IFRS Shareholders' equity and the Solvency II Available Financial Resources are presented in the table below:

Eligible own Funds ("EoF")	Period ending 31 December 2024 € Million	Period Ending 31 December 2023 € Million
<b>IFRS Shareholders' funds - Equity</b>	714	683
Best estimate liabilities and Risk margin	17	37
Full market value of assets	18	18
Pension Fund Surplus	(56)	(68)
Foreseeable dividends	0	(70)
Intangible assets	(10)	(6)
<b>Total Solvency II – EoF</b>	<b>683</b>	<b>594</b>

The key differences between the IFRS and the Solvency II frameworks are further explained below:

- Intangible asset removal relates to the removal of deferred acquisition cost (DAC), re-measured through the Best Estimate Liabilities calculation.
- The adjustment of the market value of assets is related to the recognition of unrealised gain and losses of assets (real estate) recognised at cost in the IFRS Balance Sheet.
- Best Estimate Liabilities and Risk Margin changes reflect the difference in regulations between IFRS and Solvency II in the valuation of technical provisions.

There is no foreseeable dividend proposed for 2024, the Company is focusing on reinvesting its financial resources to strengthen its capital base to support growth in its Health business.

## ***E.2 Solvency capital requirement and minimum capital requirement***

AXA received formal approval over its internal economic capital model application in November 2015. The AXA Internal economic capital model is designed to allow AXA entities to choose the local calibrations which better reflect the local risk profile and to capture all the material risks to which AXA is exposed. As a result, it is believed the internal economic capital model reflects the overall solvency need of the AXA Insurance dac more faithfully and better aligns the capital requirement metrics with Management decision making.

### **/ General principles**

The Solvency II directive provides for two separate levels of solvency margin: (i) the Minimum Capital Requirement (MCR), which is the amount of own funds below which policyholders and beneficiaries are exposed to an unacceptable level of risk should the Company be allowed to continue its operations, and (ii) the Solvency Capital Requirement (SCR), which corresponds to a level of eligible own funds that enables insurance and reinsurance companies to absorb significant losses and that gives reasonable assurance to policyholders and beneficiaries that payments will be made.

### **/ Solvency Capital Requirement**

On November 17, 2015, AXA received approval from the College of Supervisors to use its internal model to calculate its regulatory capital under Solvency II. The Solvency II capital ratio for AXA Insurance dac was 146% as of December 31, 2024. This approved internal model is calibrated to a 99.5% VAR measure over a one-year time horizon.

On December 31, 2024, the solvency capital requirement of the Company was €467 million net of tax. This is a €66 million increase from the previous year.

The split before diversification and tax is as follows by risk module: P&C risk € 367.7 million, Life risk € 21.9 million, Market risk € 112 million, Credit Risk € 30.2 million, Operational Risk € 54.2 million. The split after diversification and tax adjustment by risk categories was Market 14%, Credit 3%, Life 2%, P&C 73% and Operational 8%.

### **/ Minimum Capital Requirement**

The Minimum Capital Requirement (MCR) is meant to ensure a minimum level below which the amount of eligible own funds should not fall. That amount is calculated in accordance with a simple formula, which is subject to a defined floor and cap based on the Solvency Capital Requirement of the Company in order to allow for an escalating ladder of supervisory intervention, and that it is based on the data which can be audited.

In accordance with the methods of calculation implemented by AXA Insurance dac in line with existing regulations, the AXA Insurance dac Minimum Capital Requirement amounted to €210 million at December 31, 2024 (up €30million). As the linear Minimum Capital Requirement is capped at 45% of the Solvency Capital Requirement, the increase in MCR from N-1 to N is directly caused by the increase in SCR.

For P&C entities, the Minimum Capital Requirement is founded over a factor-based formula taking into consideration the amounts of Best Estimate Liabilities net of the amounts recoverable from reinsurance contracts and special purpose vehicles, and written premiums for each segment of business. Different factors are applied to those amounts according to each relevant segment.

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

Not applicable

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

### **/ General information**

AXA has developed a robust economic capital model since 2007 and the AXA Group internal model has been used since 2009 in the Risk Management system and decision-making processes. The main goal of AXA using an internal model as opposed to the standard formula is to better reflect the Company's risk profile in the Solvency Capital Requirement. This is considered from several aspects.

- *Taking into account local specificities* – AXA is a global Company and operates in a wide range of insurance markets offering a variety of products and targeting different demographics and different risk exposures. It is therefore appropriate, to the extent possible, to calibrate stresses specifically to these risk profiles and to allow for the benefits of diversification of the different risks across such markets.
- *Addressing shortcomings of the standard formula* – Based on its expertise, the Group can improve on the approach of the standard formula, which is naturally constrained by its general scope, to have models which are more appropriate for the scope of the Group. For example, the internal economic capital model for market risks adds some risks not covered by the standard formula (government spread risk, interest rate implied volatility and equity implied volatility risk).
- *Allowing for better evolution of the model over time* – As the Group's experience increases, its business expands to new markets and product innovations create different risks, the flexibility of an internal model allows the specificities of these developments to be reflected.

AXA Internal Model is calibrated to represent the value-at-risk of the loss distribution over a one-year time horizon at the 99.5th percentile at Solo and Group level.

- The AXA Internal Model forms an important piece of the AXA system of governance of which usage has been built and developed in strong relationship with the operating business lines and Risk Management department in a way to develop an internal model adapted to the undertaking's needs.
- The AXA Internal Model is used for assessing and managing the economic capital and is also a supportive decision-making tool in different business processes: strategic planning, underwriting, investment decisions, and project management. Besides, as integrated within the Risk Management system, the AXA Internal Model provides information for implementing the Own Risk & Solvency Assessment (ORSA) process, formulating risk strategies, monitoring risk appetite or producing risk reporting.

### **/ Main differences between the Standard Formula and the Internal Model**

The AXA Internal Model is a centralised model which is based on Group methodologies. This ensures consistency in the modelling of similar risks across the Group while still allowing for local specificities when they exist, in particular via the calibration of underwriting risks at local levels, these local calibrations being then presented and validated by Group Risk Management. Validation encompasses both quantitative and qualitative aspects of the internal model, amongst which, in particular data quality. AXA's data quality policy requires data used as input in the internal model to be complete, accurate and appropriate

The general architecture of the AXA's Internal Model consists in five main modules (Life, Market, Credit, P&C and operational risks). The Standard Formula in addition considers a separate Health risk category.

In general, in the 5 risks categories, the internal economic capital model provides models for sub-risks that are not adequately captured in the Standard Formula but are material to AXA.

Market risk: Interest rate implied volatility, equity implied volatility, Government spread, and inflation are explicitly modelled in AXA's Internal Model. The risk of concentrations in the portfolio is included in the corporate default calculation.

Due to the higher number of sub-risks and risk factors used in the internal model, the risks of the different asset classes and the diversifications among them can be captured more precisely than in the standard formula. For instance, the shocks depend on the economy, which means that for volatile markets higher shocks are assumed.

Credit risks: AXA's Internal Model addresses separately the default risk of corporate bonds whereas it is included in the calibration of spreads in the standard formula.

Property & Casualty risks: P&C lapse risk is not modelled in AXA's Internal Model as immaterial.

Operational risk: The standard formula for operational risk is factor-based (percentage of gross written premiums or technical provisions) and is not risk sensitive. AXA internal model for operational risks follows a forward-looking and Scenario-Based Approach (SBA). It relies on the identification and assessment of the most critical Operational risks of each entity complemented by a set of transversal Group scenarios.

### **Modelling techniques**

In the standard formula simple models are used for most risk categories in order to derive the SCR. In most cases an extreme scenario is defined, which represents the 99.5<sup>th</sup> percentile.

In the AXA Internal Model, sophisticated models are applied. In particular for Market, Credit, Property & Casualty, Life & Savings and Operational risk Monte Carlo simulations are used. This allows deriving the whole loss distribution.

### **Diversification**

In the standard formula, no geographical diversification is explicitly recognised. The internal economic capital model aggregation considers geographical diversification as AXA Group is operating globally.

The Solvency II framework requires the provision of a Probability Distribution Forecast (PDF) underlying the internal model that assigns probabilities to changes in the amount of Company's own funds. The following orientations have been chosen for the internal economic capital model assessment:

- The Property & Casualty and Market modules' modelling, using simulation-based approaches, allow the calculation of a full Probability Distribution Forecast.
- The modelling of the Credit risk leans on both simulation-based techniques and shock-approaches depending on the considered sub-risk. For the first techniques, full Probability Distribution Forecasts are available. Regarding shock-approaches, several percentiles, similarly to the approach performed for life risk, are calculated.

The overall aggregation process is based on an elliptical aggregation of the Market, Life, Credit, Property & Casualty and Operational requirements. This modular approach allows for the ranking of the main risks or sub-risks and provides a better understanding of the risks (sub-risks) and their impacts.

AXA Insurance dac also performs reverse stress scenarios. The aim of such scenarios is to exhibit combinations of Market, Credit, Life, P&C and Operational events (the shocks defined in the scenario are occurring simultaneously) that would yield the same amount as the SCR for a chosen valuation date. They allow the assessment of several impacts inherent to the internal model. They include back-testing for the correlation coefficients' accuracy. Indeed, performing such scenarios highlights potential cross and non-linearity effects. Based on this analysis AXA Insurance dac use conservative correlation coefficients.

These back-testing techniques are useful as they highlight potential shortcomings coming from the aggregation structure (relying on an elliptical framework and the associated assumptions)

**Data**

The data used for local parametrisation of the internal model comes predominantly from the Reserving process and from the Finance area. The data is validated for appropriateness prior to use in the internal model

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

The MCR and SCR requirements were met in full in the year ending 31 December 2024.

***E.6 Any other information***

Not Applicable

A woman with dark hair and bangs, wearing a dark blue suit jacket over a white shirt, is looking upwards and to the right. A large, solid red arrow points from the bottom left towards the top right, partially overlapping the woman and the text.

**AXA**  
**Insurance dac**  
**Quantitative**  
**Reporting Templates**  
**(QRT) YE2024**

# Quantitative Reporting Templates

## Quantitative Reporting Templates YE 2024

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### Content of the submission

<b>Template Code</b>	<b>Template name</b>	<b>Applicable</b>
S.02.01.02	Balance sheet information	Yes
S.04.05.21	Premiums, claims and expenses by country	Yes
S.05.01.02	Premiums, claims and expenses by line of business	Yes
S.12.01.02	Technical provisions relating to life insurance and health insurance	No
S.17.01.02	Non-life technical provisions	Yes
S.19.01.21	Non-life insurance claims	Yes
S.22.01.21	Impact of the long-term guarantee and transitional measures	No
S.23.01.01	Own funds, including basic own funds and ancillary own funds	Yes
S.25.01.21	Solvency Capital Requirement calculated using the standard formula	No
S.25.05.21	Solvency Capital Requirement - for undertakings using an internal model (partial or full)	Yes
S.28.01.01	Minimum Capital Requirement for insurance and reinsurance undertakings engaged in only life or only non-life insurance or reinsurance activity	Yes
S.28.02.01	Minimum Capital Requirement for insurance undertakings engaged in both life and non-life insurance activity	No

## / Quantitative Reporting Templates

The following Quantitative Reporting Templates are presented as part of the YE 2023 Solvency and Financial Condition Report of AXA Insurance dac.

### Template S.02.01.02

Template S.02.01.02 of Annex I specifying balance sheet information using the valuation in accordance with Article 75 of Directive 2009/138/EC, following the instructions set out in section S.02.01 of Annex II to this Regulation;

in EUR

Assets		Solvency II value
		C0010
Intangible assets	<b>R0030</b>	833,333.00
Deferred tax assets	<b>R0040</b>	15,759,019.00
Pension benefit surplus	<b>R0050</b>	-
Property, plant & equipment held for own use	<b>R0060</b>	57,046,067.00
<b>Investments (other than assets held for index-linked and unit-linked contracts)</b>	<b>R0070</b>	<b>2,350,096,054.00</b>
Property (other than for own use)	<b>R0080</b>	-
Holdings in related undertakings, including participations	<b>R0090</b>	-
<b>Equities</b>	<b>R0100</b>	<b>59,811,942.00</b>
Equities - listed	R0110	59,811,942.00
Equities - unlisted	R0120	-
<b>Bonds</b>	<b>R0130</b>	<b>1,740,322,823.00</b>
Government Bonds	R0140	609,665,246.00
Corporate Bonds	R0150	950,457,563.00
Structured notes	R0160	-
Collateralised securities	R0170	180,200,014.00
Collective Investments Undertakings	R0180	502,600,593.00
Derivatives	R0190	47,360,696.00
Deposits other than cash equivalents	R0200	-
Other investments	R0210	-
Assets held for index-linked and unit-linked contracts	R0220	-
<b>Loans and mortgages</b>	<b>R0230</b>	<b>98,169,497.00</b>
Loans on policies	R0240	-
Loans and mortgages to individuals	R0250	179,007.00
Other loans and mortgages	R0260	97,990,490.00
<b>Reinsurance recoverables from:</b>	<b>R0270</b>	<b>63,357,305.00</b>
Non-life and health similar to non-life	<b>R0280</b>	63,357,305.00
Non-life excluding health	<b>R0290</b>	29,251,174.00
Health similar to non-life	<b>R0300</b>	34,106,131.00
Life and health similar to life, excluding health and index-linked and unit-linked	<b>R0310</b>	-
Health similar to life	<b>R0320</b>	-
Life excluding health and index-linked and unit-linked	<b>R0330</b>	-
Life index-linked and unit-linked	<b>R0340</b>	-
Deposits to cedants	<b>R0350</b>	39,365,816.00
Insurance and intermediaries receivables	<b>R0360</b>	86,361,042.00
Reinsurance receivables	<b>R0370</b>	8,657,281.00
Receivables (trade, not insurance)	<b>R0380</b>	12,576,855.00
Own shares (held directly)	<b>R0390</b>	-
Amounts due in respect of own fund items or initial fund called up but not yet paid in	<b>R0400</b>	-
Cash and cash equivalents	<b>R0410</b>	79,877,051.00
Any other assets, not elsewhere shown	<b>R0420</b>	382,314.00
<b>Total assets</b>	<b>R0500</b>	<b>2,812,481,634.00</b>

**Template S.04.05.21**

Template S.04.05.21 Premiums, claims and expenses by country;

		Home country	GB	FR	ES	GR	LU	Top 5 countries: non-life
		C0010	C0020	C0020	C0020	C0020	C0020	C0020
<b>Premiums written (gross)</b>								
Gross Written Premium (direct)	R0020	745974090	312130295	3,169,727	11,884,181	12,882,474	2,644,320	342,710,997
Gross Written Premium (proportional reinsurance)	R0021			29303246				29303246
Gross Written Premium (non-proportional reinsurance)	R0022							
<b>Premiums earned (gross)</b>								
Gross Earned Premium (direct)	R0030	776,396,307.00	296,029,622	3,076,367	11,534,148	12,503,037	2,566,435	325,709,609
Gross Earned Premium (proportional reinsurance)	R0031			29304011				29304011
Gross Earned Premium (non-proportional reinsurance)	R0032							
<b>Claims incurred (gross)</b>								
Claims incurred (direct)	R0040	425029416	214,900,731	2,030,969	7,614,666	8,254,311	1,694,321	234,494,998
Claims incurred (proportional reinsurance)	R0041			5,474,263				5,474,263
Claims incurred (non-proportional reinsurance)	R0042							
<b>Expenses incurred (gross)</b>								
Gross Expenses Incurred (direct)	R0050	248163626	79,455,475	632,191	2,370,260	2,569,366	527,401	85,554,693
Gross Expenses Incurred (proportional reinsurance)	R0051			4,484,544				4,484,544
Gross Expenses Incurred (non-proportional reinsurance)	R0052							



## Template S.17.01.02

Template S.17.01.02 of Annex I, specifying information on non-life technical provisions, following the instructions set out in section S.17.01 of Annex II to this Regulation for each line of business as defined in Annex I of Delegated Regulation (EU) 2015/35;

in EUR		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
<b>Technical provisions calculated as a whole</b>	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	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Technical provisions calculated as a sum of BE and RM</b>																		
<b>Best estimate</b>																		
Premium provisions																		
Gross	R0060	13,601,657.00	377,719.00	-	147,183,616.00	48,789,837.00	-	42,888,213.00	7,457,164.00	-	205,742.00	-	717,876.00	-	-	-	-	261,221,824.00
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140	12,871,061.00	-	-	435,597.00	5,953,631.00	-	1,150,877.00	51,390.00	-	-	-	25,695.00	-	-	-	-	20,488,251.00
Net Best Estimate of Premium Provisions	R0150	730,596.00	377,719.00	-	146,748,019.00	42,836,206.00	-	41,737,336.00	7,405,774.00	-	205,742.00	-	692,181.00	-	-	-	-	240,733,573.00
<b>Claims provisions</b>																		
Gross	R0160	24,440,906.00	58,370.00	-	1,272,562,543.00	15,185,963.00	-	110,725,179.00	96,322,223.00	-	490,188.00	-	2,735,622.00	-	-	-	-	1,522,520,994.00
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240	21,235,070.00	-	-	19,778,509.00	106,330.00	-	1,749,146.00	-	-	-	-	1.00	-	-	-	-	42,869,054.00
Net Best Estimate of Claims Provisions	R0250	3,205,836.00	58,370.00	-	1,252,784,034.00	15,079,633.00	-	108,976,033.00	96,322,223.00	-	490,188.00	-	2,735,623.00	-	-	-	-	1,479,651,940.00
<b>Total Best estimate - gross</b>	R0260	38,042,563.00	436,089.00	-	1,419,746,159.00	63,975,800.00	-	153,613,392.00	103,779,387.00	-	695,930.00	-	3,453,498.00	-	-	-	-	1,783,742,818.00
<b>Total Best estimate - net</b>	R0270	3,936,432.00	436,089.00	-	1,399,532,053.00	57,915,839.00	-	150,713,369.00	103,727,997.00	-	695,930.00	-	3,427,804.00	-	-	-	-	1,720,385,513.00
<b>Risk margin</b>	R0280	17,783.00	336,299.00	-	39,512,477.00	2,851,818.00	-	3,542,294.00	2,345,299.00	-	1.00	-	16,143.00	-	-	-	-	48,622,114.00
<b>Technical provisions - total</b>																		
Technical provisions - total	R0320	38,060,346.00	772,388.00	-	1,459,258,636.00	66,827,618.00	-	157,155,686.00	106,124,686.00	-	695,931.00	-	3,469,641.00	-	-	-	-	1,832,364,932.00
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	R0330	34,106,131.00	-	-	20,214,106.00	6,059,961.00	-	2,900,023.00	51,390.00	-	-	-	25,694.00	-	-	-	-	63,357,305.00
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	R0340	3,954,215.00	772,388.00	-	1,439,044,530.00	60,767,657.00	-	154,255,663.00	106,073,296.00	-	695,931.00	-	3,443,947.00	-	-	-	-	1,769,007,627.00

**Template S.19.01.21**

Template S.19.01.21 of Annex I, specifying information on non-life insurance claims in the format of development triangles, following the instructions set out in section S.19.01 of Annex II for the total non-life business;

Accident year / Underwriting year	Z0020	AY
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**Gross Claims Paid (non-cumulative)**  
(absolute amount)

Year	Development year										
	0	1	2	3	4	5	6	7	8	9	10 & +
	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110
Pri or	R0100										4,101,002.00
N-9	R0160	109,648,293.00	73,269,981.00	53,307,836.00	43,691,712.00	33,513,791.00	17,733,465.00	11,869,343.00	8,360,900.00	6,077,733.00	3,123,366.00
N-8	R0170	106,139,782.00	71,885,947.00	51,253,192.00	41,114,001.00	24,243,383.00	18,802,544.00	19,498,449.00	11,361,596.00	5,874,803.00	
N-7	R0180	103,824,507.00	75,637,510.00	57,687,773.00	39,161,360.00	29,165,333.00	19,685,504.00	12,588,877.00	9,977,573.00		
N-6	R0190	124,711,866.00	88,464,385.00	50,002,754.00	44,851,679.00	31,182,053.00	23,955,812.00	15,334,220.00			
N-5	R0200	147,641,715.00	92,981,547.00	54,099,566.00	35,098,988.00	38,197,350.00	27,752,101.00				
N-4	R0210	180,569,080.00	88,934,363.00	16,495,647.00	28,370,991.00	56,360,428.00					
N-3	R0220	176,392,628.00	93,569,035.00	44,712,079.00	47,901,198.00						
N-2	R0230	233,652,873.00	141,117,797.00	75,929,447.00							
N-1	R0240	285,952,966.00	174,627,810.00								
N	R0250	285,906,575.00									

	C0170	C0180
R0100	4,101,002.00	1,759,142,404.00
R0160	3,123,366.00	360,596,420.00
R0170	5,874,803.00	350,173,697.00
R0180	9,977,573.00	347,728,436.00
R0190	15,334,220.00	378,502,769.00
R0200	27,752,101.00	395,771,266.00
R0210	56,360,428.00	370,730,509.00
R0220	47,901,198.00	362,574,941.00
R0230	75,929,447.00	450,700,117.00
R0240	174,627,810.00	460,580,775.00
R0250	285,906,575.00	285,906,575.00

**Gross undiscounted Best Estimate Claims Provisions**  
(absolute amount)

Year	Development year										
	0	1	2	3	4	5	6	7	8	9	10 & +
	C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300
Pri or	R0100										17,398,371.00
N-9	R0160	-	184,499,735.00	155,002,456.00	110,089,899.00	74,082,474.00	52,931,779.00	41,428,643.00	34,185,042.00	22,024,888.00	16,820,296.00
N-8	R0170	284,830,639.00	200,828,911.00	148,412,774.00	103,634,424.00	78,552,148.00	63,043,398.00	43,098,295.00	28,233,825.00	19,549,200.00	
N-7	R0180	321,256,020.00	235,468,653.00	180,317,433.00	138,106,545.00	113,218,845.00	83,654,326.00	67,977,682.00	40,439,819.00		
N-6	R0190	341,021,000.00	255,009,855.00	205,925,375.00	164,955,295.00	139,196,444.00	113,633,839.00	76,345,571.00			
N-5	R0200	369,279,107.00	279,906,745.00	229,169,170.00	192,255,234.00	137,759,998.00	91,023,300.00				
N-4	R0210	391,707,319.00	267,470,409.00	248,168,361.00	209,834,750.00	130,581,530.00					
N-3	R0220	356,348,702.00	301,312,961.00	228,873,325.00	179,852,586.00						
N-2	R0230	400,843,619.00	290,076,573.00	225,747,131.00							
N-1	R0240	460,338,529.00	331,201,914.00								
N	R0250	480,901,417.00									

**Year end (discounted data)**

	C0360
R0100	16,459,311.00
R0160	15,909,365.00
R0170	18,497,666.00
R0180	38,262,936.00
R0190	72,226,425.00
R0200	86,103,972.00
R0210	123,551,156.00
R0220	169,883,392.00
R0230	213,398,423.00
R0240	313,338,268.00
R0250	454,890,020.00
Total	1,522,520,934.00

### Template S.23.01.01

Template S.23.01.01 of Annex I, specifying information on own funds, including basic own funds and ancillary own funds, following the instructions set out in section S.23.01 of Annex II;

#### Own funds

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
<b>Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35</b>						
Ordinary share capital (gross of own shares)	R0010	42,079,232.00	42,079,232.00			
Share premium account related to ordinary share capital	R0030	30,980,339.00	30,980,339.00			
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					0
Preference shares	R0090					
Share premium account related to preference shares	R0110					
Reconciliation reserve	R0130	526,244,908.00	526,244,908.00			
Subordinated liabilities	R0140					
An amount equal to the value of net deferred tax assets	R0160	12,076,045.00				12,076,045.00
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180	71,565,472.00	71,565,472.00			
<b>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</b>						
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					
<b>Deductions</b>						
Deductions for participations in financial and credit institutions	R0230					
<b>Total basic own funds after deductions</b>	R0290	682,945,996.00	670,869,951.00	0.00	0.00	12,076,045.00
<b>Ancillary own funds</b>						
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	0.00				
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330	0.00				
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	0.00				
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	0.00				
Other ancillary own funds	R0390	0.00				
<b>Total ancillary own funds</b>	R0400	0.00			0.00	0.00
<b>Available and eligible own funds</b>						
<b>Total available own funds to meet the SCR</b>	R0500	682,945,996.00	670,869,951.00			12,076,045.00
<b>Total available own funds to meet the MCR</b>	R0510	670,869,951.00	670,869,951.00			
Total eligible own funds to meet the SCR	R0540	682,945,996.00	670,869,951.00			12,076,045.00
Total eligible own funds to meet the MCR	R0550	670,869,951.00	670,869,951.00			
<b>SCR</b>	R0580	467,326,804.00				
<b>MCR</b>	R0600	210,297,062.00				
<b>Ratio of Eligible own funds to SCR</b>	R0620		1.46			
<b>Ratio of Eligible own funds to MCR</b>	R0640		3.19			

## Template S25.05.21

Template S.25.05.21 , specifying Solvency Capital Requirement - for undertakings using an internal model (partial or full);

Risk type		Solvency Capital Requirement	Amount modelled	USP	Simplifications
		C0010	C0070	C0090	C0120
Total diversification	R0020	-491,935,261	-		0
Total diversified risk before tax	R0030	467,326,804	-		0
Total diversified risk after tax	R0040	467,326,804	-		0
Total market & credit risk	R0070	246,494,781	-		0
Market & Credit risk - diversified	R0080	111,969,257	-		0
Credit event risk not covered in market & credit risk	R0190	30,440,648	-		0
Credit event risk not covered in market & credit risk - diversified	R0200	30,168,120	-		0
Total Business risk	R0270	-	-		0
Total Business risk - diversified	R0280	-	-		0
Total Net Non-life underwriting risk	R0310	501,707,828	-		0
Total Net Non-life underwriting risk - diversified	R0320	367,681,628	-		0
Total Life & Health underwriting risk	R0400	21,924,317	-		0
Total Life & Health underwriting risk - diversified	R0410	21,924,317	-		0
Total Operational risk	R0480	147,272,478	-		0
Total Operational risk - diversified	R0490	54,209,565	-		0
Other risk	R0500	11,422,014	-		0

		C0100
Total undiversified components	R0110	959,262,065
Diversification	R0060	-491,935,261
Adjustment due to RFF/MAP nSCR aggregation	R0120	0
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	0
Solvency capital requirement, excluding capital add-ons	R0200	467,326,804
Capital add-ons already set	R0210	0
of which, Capital add-ons already set - Article 37 (1) Type a	R0211	0
of which, Capital add-ons already set - Article 37 (1) Type b	R0212	0
of which, Capital add-ons already set - Article 37 (1) Type c	R0213	0
of which, Capital add-ons already set - Article 37 (1) Type d	R0214	0
Solvency capital requirement	R0220	467,326,804
<b>Other information on SCR</b>		
Amount/estimate of the overall loss-absorbing capacity of technical provisions	R0300	0
Amount/estimate of the loss absorbing capacity for deferred taxes	R0310	0
Capital requirement for duration-based equity risk sub-module	R0400	0
Total amount of Notional Solvency Capital Requirements for remaining part	R0410	0
Total amount of Notional Solvency Capital Requirements for ring-fenced funds	R0420	0
Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	R0430	0
Diversification effects due to RFF nSCR aggregation for article 304	R0440	0
Method used to calculate the adjustment due to RFF nSCR aggregation	R0450	4
Net future discretionary benefits	R0460	0

### S.25.05.21.03 Approach to tax rate

		Yes/No
		C0109
Approach based on average tax rate	R0590	1

### S.25.05.21.04 Calculation of loss absorbing capacity of deferred taxes

		LAC DT
		C0130
Amount/estimate of LAC DT	R0640	0
Amount/estimate of LAC DT justified by reversion of deferred tax liabilities	R0650	0
Amount/estimate of LAC DT justified by reference to probable future taxable economic profit	R0660	0
Amount/estimate of LAC DT justified by carry back, current year	R0670	0
Amount/estimate of LAC DT justified by carry back, future years	R0680	0
Amount/estimate of Maximum LAC DT	R0690	0

**Template S.28.01.01**

template S.28.01.01 of Annex I, specifying the Minimum Capital Requirement for insurance and reinsurance undertakings engaged in only life or only non-life insurance or reinsurance activity, following the instructions set out in section S.28.01 of Annex II;

Linear formula component for non-life insurance and reinsurance obligations		MCR components
		C0010
MCRNL Result	R0010	241,072,175.00

Background information		Background information	
		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	3,936,433.00	5,387,310.00
Income protection insurance and proportional reinsurance	R0030	436,089.00	2,192,841.00
Workers' compensation insurance and proportional reinsurance	R0040	0.00	0.00
Motor vehicle liability insurance and proportional reinsurance	R0050	1,399,532,063.00	590,688,815.00
Other motor insurance and proportional reinsurance	R0060	57,915,839.00	215,894,575.00
Marine, aviation and transport insurance and proportional reinsurance	R0070	0.00	0.00
Fire and other damage to property insurance and proportional reinsurance	R0080	150,713,369.00	181,326,666.00
General liability insurance and proportional reinsurance	R0090	103,727,997.00	45,272,385.00
Credit and suretyship insurance and proportional reinsurance	R0100	0.00	0.00
Legal expenses insurance and proportional reinsurance	R0110	695,930.00	382,422.00
Assistance and proportional reinsurance	R0120	0.00	0.00
Miscellaneous financial loss insurance and proportional reinsurance	R0130	3,427,804.00	2,024,674.00
Non-proportional health reinsurance	R0140	0.00	0.00
Non-proportional casualty reinsurance	R0150	0.00	0.00
Non-proportional marine, aviation and transport reinsurance	R0160	0.00	0.00
Non-proportional property reinsurance	R0170	0.00	0.00



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