
DLL RE DAC

SOLVENCY AND FINANCIAL CONDITION REPORT

31ST December 2024

Contents

Executive Summary	3
A. Business and Performance	6
A.1 Business	6
A.2 Performance from Underwriting Activities	7
A.3 Performance from Investment Activities.....	8
A.4 Operating/Other Expenses	9
A5. Any other disclosures	9
B. System of Governance.....	10
B.1 General Information on the System of Governance.....	10
B.2 Fitness and Probity.....	12
B.3 Risk Management System including the Own Risk and Solvency Assessment.....	13
B.4 Internal Control and Compliance Function.....	15
B.5 Internal Audit Function	16
B.6 Actuarial Function	17
B.7 Outsourcing.....	17
B.8 Assessment of governance and any other disclosure.....	18
C. Risk Profile	19
C.1 Underwriting Risk.....	19
C.2 Market Risk	20
C.3 Credit Risk	21
C.4 Liquidity Risk	22
C.5 Operational Risk.....	22
C.6 Risk Sensitivities	23
C.7 Other Material Risks	23
D. Valuation for Solvency Purposes	25
D.1 Assets.....	25
D.2 Technical Provisions	26
D.3 Other Liabilities.....	30
D.4 Alternative methods for valuation	30
D.5 Any other information.....	30
E. Capital Management	31
E.1 Own Funds	31
E.2 Solvency Capital Requirement and Minimum Capital Requirement	32

E.3 Use of the duration-based equity risk sub-module in the calculation of the Solvency Capital Requirement	35
E.4 Difference between the Standard Formula and any Internal Model used	35
E.5 Non-compliance with the Minimum Capital Requirement and non-compliance with the Solvency Capital Requirement	35
E.6 Any Other Information	35
Annex 1 SFCR Disclosed QRT's	36

Executive Summary

This is the Solvency and Financial Condition Report (SFCR) of DLL RE Designated Activity Company (“DLL RE” or “the Company”) for year ended 31 December 2024.

The SFCR is produced as part of DLL RE’s compliance with the reporting requirements under Solvency II. This report covers the business and performance of the Company, its system of governance, risk profile, valuation for solvency purposes and capital management.

DLL RE DAC operates from its office at 7th Floor, 76 Sir John Rogerson’s Quay, Dublin 2. Established in 2005 by De Lage Landen International B.V. (“DLL Group”) DLL RE is a non-life reinsurer regulated by the Central Bank of Ireland.

DLL RE’s principle activity is to reinsure programs underwritten by insurance companies insuring risks related to assets, leases and financing currently provided by the DLL Group, its subsidiaries and selected vendor partners. The primary strategic objective of DLL RE is to generate non-life underwriting income in a controlled, compliant and sustainable manner via the provision of reinsurance coverage on risks relating to the leasing and financing enterprises of the DLL Group and selected vendor partners.

The Company’s financial year runs to 31st December each year and it reports its results in Euro (€).

Business and Performance

During the past year, DLL RE experienced stable growth. Gross premiums written in 2024 were €30,678k and DLL RE reported a profit of €18,921k for the period. A release in provisions within the Motor Vehicle Liability and Income Protection segments contributed significantly to this performance, while the overall claims experience across all other segments remained favorable. No new reinsurance programs were underwritten during the year, and there were no material changes to the business mix or volumes of existing programs.

DLL RE’s investment mix remained unchanged, with the company continuing to hold cash deposits and term deposits. The primary factors influencing DLL RE’s interest income were the downward movements in USD and EUR interest rates throughout 2024 however overall interest income has increased year on year. At 31 December 2024, DLL RE earned €7,346k in interest income.

In 2024, the geopolitical landscape was marked by significant conflicts and escalating tensions in various regions. The Company is monitoring these developments, as they impact global stability and relations. In addition, we are closely observing the political landscape in the US and the potential introduction of tariffs, which could significantly impact the U.S. agricultural sector. This includes the increased cost of imported agricultural machinery and parts, potentially raising the cost of claims and making the future trajectory of claims inflation uncertain.

The Company continues to exercise caution regarding claim reporting delays in certain programs and the potential for claims inflation. Throughout the year, DLL RE closely monitored its largest programs, made appropriate inflation assumptions in its reserving process, and incorporated comprehensive scenario analyses in the Own Risk and Solvency Assessment (ORSA) and key planning processes. A prudent approach to claims reserving has been consistently maintained.

Climate change poses a risk to both the Company and its stakeholders. In line with regulatory and DLL Group expectations, the Company continues to develop processes and controls proportionate to the nature and scale of the business. In 2024, significant weather-related events, including wildfires in California, floods in Spain, and Hurricanes Helene and Milton in the USA, caused substantial damage. Despite these incidents, the Company has not experienced any adverse effects. DLL RE will continue to monitor the potential impact of climate change on operations and implement mitigating solutions when required.

DLL RE falls under the scope of Pillar 2 of the OECD Tax Policy Reform Pillar 2 Framework and is also in scope for the Digital Operational Resilience Act (DORA).

Refer to Section A for further details relating to business and performance.

System of Governance

The Board of Directors is the supervisory and management body of DLL RE and is ultimately responsible for all activities of the Company. It has various governance and control functions in place to monitor and manage the business and to ensure that DLL RE adheres to all applicable laws and regulations at both an Irish and EU level.

Refer to Section B for further details on the Company's system of governance.

Risk Profile

DLL RE is exposed to a wide variety of risks that arise as a result of doing business. The principal risks and uncertainties that the business faces are from non-life underwriting risk, market risk, default risk, operational and other material risks. DLL RE has implemented a set of limits and controls to manage these risks.

Refer to Section C for further detail on the Company's risk profile.

Valuation for Solvency Purposes

The Company's financial statements including the balance sheet have been prepared in accordance with FRS 102 and FRS 103.

DLL RE's Solvency II balance sheet is prepared as of December 31. The balance sheet is prepared in compliance with Solvency II Regulations. There are no material changes to the valuation for solvency purposes over the reporting period.

Refer to Section D for further detail on valuation for Solvency purposes.

Capital Management note relating to contract boundaries

DLL RE manages its capital base to achieve a prudent balance between maintaining capital ratios to support business growth, maintaining capital in line with Solvency Capital Requirements (SCR) and delivering acceptable returns.

The Company applies the Standard Formula approach in calculating the Solvency Capital Requirement.

At the end of the reporting period the Company has own funds of €115,120k compared to a solvency capital requirement of €54,310k and a minimum capital requirement (MCR) of €13,578k. The SCR ratio of the company is 211.97% and MCR ratio is 847.87%. The Company was compliant with Solvency II capital requirements throughout the year.

Refer to Section E for further detail on Capital Management.

Events since the end of the financial year

There have been no events since the end of the financial year that require disclosure in or amendment to the financial statements.

Any Other Information

There have been no other material developments regarding the business and performance of the Company during the reporting period.

A. Business and Performance

A.1 Business

A.1.1 Name and legal form of the undertaking

DLL RE is a non-life reinsurance company limited by shares. The Company's operating address and registered office is:

DLL RE Designated Activity Company,
7th Floor,
76 Sir John Rogerson's Quay,
Dublin 2.

A.1.2 Name of Supervisory Authority

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

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

A.1.3 Name and contact details of external auditor

The name and contact details of the Company's external auditor is:

PricewaterhouseCoopers,
Chartered Accountants and Statutory Audit Firm,
One Spencer Dock,
North Wall Quay,
Dublin 1.

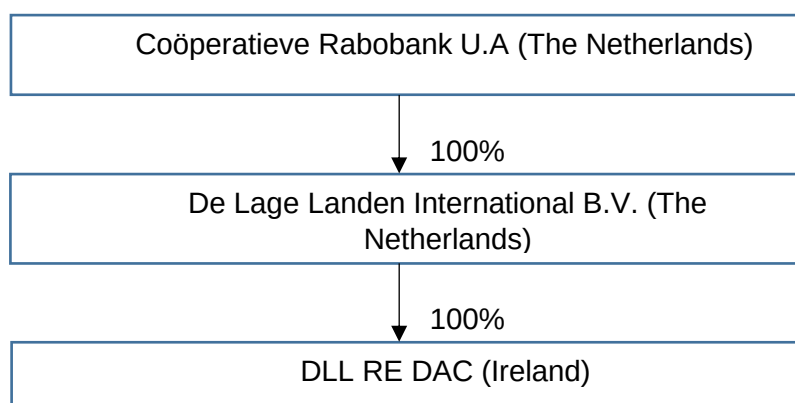
A.1.4 Holders of qualifying holdings in the undertaking

The Company is a 100% subsidiary of:

De Lage Landen International B.V.
Vestdijk 51,
5611 CA, Eindhoven,
The Netherlands.

A.1.5 Details of the undertaking's position within the legal structure of the group

The ultimate holding Company is Coöperatieve Rabobank U.A. based in The Netherlands. The ownership structure of DLL RE is listed below:



A.1.6 Material Lines of business and material geographical area where it carries out business

The material lines of business are Physical Damage, Motor Third Party Liability and Miscellaneous Financial Loss.

DLL RE has reinsurance risks located as follows:

- **Europe:** Sweden, Norway, Denmark, Finland, the Netherlands, Belgium, UK, France, Germany, Spain, Italy.
- **North America:** United States and Canada
- **South America:** Brazil (run-off 31 July 2021)
- **Australia:** Australia

A.1.7 Significant business or other events occurring over the reporting period

The significant events that have occurred in the reporting period are as follows:

- The Company commuted two run-off programs in the Income Protection and Motor Liability segments.
- Local stakeholders implemented a program price increase for new business in the Other Motor segment, effective from January 2, 2025.
- The Company increased its participation share in a Physical Damage insurance program located in the U.S.A. in the Other Motor segment effective 1 August 2024. The Company will benefit from commission expense reductions relating to a program in the Other Motor insurance segment effective 01 January 2025.
- No new programs were underwritten in 2024.

A.2 Performance from Underwriting Activities

DLL RE operates as a non-life reinsurance business, reinsuring programs underwritten by insurance companies insuring risks related to assets, leases and financing currently provided by the DLL Group, its subsidiaries and selected vendor partners. The DLL Group is a global provider of asset-based financial solutions working across key industries: Agriculture, Food, Healthcare, Clean Technology, Transportation, Construction, Industrial Equipment, Office Equipment and Software and Technology.

DLL RE works together with a range of brokers, insurers (investment grade) and the DLL Insurance Department (Product Overlay). DLL RE has seven active programs and has a wide geographical presence with reinsurance risks located in four continents.

An analysis of underwriting performance is provided for the years 2024 and 2023 below.

Financial Performance (all amounts in k €)	Other Motor Insurance		Miscellaneous Financial Loss		Fire and other damage to		Motor Vehicle Liability		Income Protection		Total	
	2024	2023	2024	2023	2024	2023	2024	2023	2024	2023	2024	2023
Net Written Premiums	25,320	24,849	898	1,582	4,460	4,366	-	-	-	-	30,678	30,797
Change in Provision for Unearned Premiums	(3,673)	(6,670)	42	(40)	(43)	(118)	-	-	-	-	(3,674)	(6,828)
Net Earned Premiums	21,648	18,179	940	1,541	4,417	4,249	-	-	-	-	27,004	23,969
Net Claims Incurred	(8,285)	(5,466)	20	(286)	(1,788)	(1,144)	1,485	2,076	164	50	(8,404)	(4,770)
Commission Expense	(2,494)	(2,380)	(188)	(263)	(192)	(207)	-	-	-	-	(2,874)	(2,851)
Net Underwriting Income	10,868	10,333	772	992	2,437	2,897	1,485	2,076	164	50	15,726	16,348

The Company recorded a strong underwriting performance for the financial year-end 2024. The technical result for the Company as per the audited financial statements was €15,726k (€16,348k in 2023).

An analysis of underwriting performance split into Non-European and European is provided for the years 2024 and 2023.

Financial Performance (all amounts in k €)	2024			2023		
	Non EU	EU	Total	Non EU	EU	Total
Net Written Premium	25,131	5,547	30,678	24,831	5,966	30,797
Change in Provision for Unearned Premiums	(3,758)	84	(3,674)	(6,975)	147	(6,828)
Net Earned Premium	21,373	5,631	27,004	17,856	6112	23,969
Net Claims Incurred	(8,784)	380	(8,404)	(5,668)	898	(4,770)
Written Premiums ceded to reinsurer	-	-	-	-	-	-
Commission Expense	(2,118)	(756)	(2,874)	(1,800)	(1,051)	(2,851)
Net Underwriting Income	10,471	5,255	15,726	10,388	5,959	16,348

A.3 Performance from Investment Activities

DLL RE manages its assets in a sound and prudent manner. DLL RE investment's comprises a mix of cash and deposits. DLL RE holds assets which adequately cover technical reserves and the required solvency margin. The Company's investment strategy is conservative in nature and DLL RE aims to maximise its returns subject to agreed risk constraints.

It is DLL RE's policy to maintain investments in:

- Separate cash deposits internally within the Rabobank Group or
- Externally with banks (subject to internal counterparty's approvals).

Any other investments, any new allowable investments or new bank relationships must be pre-approved by the Board. In 2024, the Company made an interest income of €7,346k.

The performance for Investment Activities is summarized below:

Investment Income €'000	2024	2023
Interest income from financial assets not at fair value through profit and loss	7,346	5,643
Total	7,346	5,643

The result for Cash and Cash Equivalents is summarized below:

Cash and cash equivalents €'000	2024	2023
Cash at bank	12,682	16,894
Short term deposits with Rabobank	42,566	3,986
Total	55,248	20,880

A.4 Operating/Other Expenses

DLL RE's operating expenses consist of commissions, brokerage and other operating expenses. Other operating expenses include salaries and general operating expenses.

The breakdown of administrative expenses is summarised below.

Administrative Expenses €'000	2024	2023
Commission	1,952	1,749
Brokerage	921	1,102
Other operating expenses	1,448	1,023
Total	4,321	3,874

A5. Any other disclosures

There have been no further material developments regarding the business and performance of the Company during the reporting period.

B. System of Governance

B.1 General Information on the System of Governance

B.1.1 Roles and responsibilities of the Board and Committees

The Board

The Company is classified as a Low-Risk Impact firm under the Central Bank of Ireland's risk-based framework for the supervision of regulated firms, known as PRISM (Probability Risk and Impact System). The Company is subject to the Central Bank of Ireland's Corporate Governance Requirements for Insurance Undertakings 2015.

In accordance with the stipulated criteria of the Central Bank of Ireland, the Board of DLL RE is of sufficient size, composition and expertise to oversee adequately the Company's operations. The Board is the supervisory and management body of DLL RE and is ultimately responsible for all activities of the Company. It ensures that DLL RE adheres to all applicable laws and regulations at both an Irish and EU level.

The Board is responsible for, and maintains oversight of, the daily activities undertaken by the local management team. This oversight includes the selection and appointment of individuals demonstrating sufficient knowledge, integrity and competence to execute the daily activities of the Company. The Company's management team, located in the registered offices of DLL RE, consists of a General Manager, a Business Development Underwriter, Financial Controller and a Reinsurance Technician.

The membership of the Board of Directors is as follows:

Fergal O'Mongain: Non-Executive Director / Chairman
Olivia Allen: Executive Director
Brendan Malley: Non-Executive Director
Philip Doyle: Independent Non-Executive Director
Andre Matthijssen: Independent Non-Executive Director
Steve Blake: Non-Executive Director

A suite of policy documentation and checklists supports the corporate governance regime of the business always ensuring robust procedures and a strong internal control environment. Oversight controls around key business processes and outsourced activities are a focus of the work undertaken by the Internal Audit function.

The Board of Directors also undertakes completion of an annual Board performance questionnaire. The results of the questionnaire are tabled at the next Board meeting for discussion and consideration.

The Board of the Company has delegated certain functional tasks and authority resulting from the Board's roles and responsibilities to executive members. The standing Committees of the Company are the Audit Committee and the Risk Committee, both of which include significant Board Member representation. These Committees follow the directives of the Central Bank of Ireland.

The Risk Committee

The purpose of the DLL RE Risk Committee is to make decisions on reinsurance programs, new business applications and on proposed material changes in existing programs and to assist the Board of DLL RE in making decisions on the company's current risk appetite, risk exposures and future risk strategy, the company's proposed strategic solvency targets and the integrity of the company's risk management framework. The Risk Committee has authority to approve business that falls within the scope of DLL RE's risk appetite and underwriting guidelines. The Risk Committee consists of such number of Non-executive and Independent Non-executive Directors as shall be appropriate to the nature, scale and complexity of the business but in any event shall have not less than three Board members. The Chairman of the Risk Committee is a non-executive director or an independent non-executive director.

The membership of the Risk Committee is as follows:

Brendan Malley (Chairman)
Philip Doyle
Andre Matthijssen

The Audit Committee

The purpose of the Audit Committee is to assist the Board of DLL RE in fulfilling its oversight responsibilities for the integrity of the company's financial statements, the company's compliance with legal and regulatory requirements and the performance of the company's internal audit function and independent auditors. The Audit Committee consists of three non-executive directors the majority of directors being independent. The membership is sufficient to handle the size and complexity of the business. The Chairperson is an Independent Non-executive Director. Attendance of non-members of the Audit Committee meetings is by invitation. Members of the Audit Committee and its Chairperson shall be appointed by the Board of DLL RE and their membership shall be subject to regular review.

The membership of the Audit Committee is as follows:

Philip Doyle (Chairman)
Brendan Malley
Andre Matthijssen

B.1.2 Material changes in the system of governance during the reporting period

There were no changes to the system of Governance during the reported period.

B.1.3. Remuneration policy of DLL RE

Due to the scale, nature and complexity of the company it does not have its own separate HR department. The HR responsibilities are shared between DLL RE Management and various other areas including DLL Ireland, DLL in Eindhoven and the Management Company. The Board is responsible for ensuring that DLL RE has robust governance arrangements and adequate control mechanisms, including remuneration policies and practices which are consistent with and promote sound and effective risk management and which do not promote excessive risk taking. For this purpose, DLL RE has adopted the Global Remuneration Policy of the DLL Group and is governed by the policies and practices set out in the Global Remuneration Policy of the DLL Group.

B.1.4 Material transactions during the reporting period with shareholders

There were no material transactions during the reporting period.

B.2 Fitness and Probity

Under the Fitness and Probity regime all regulated entities are required to confirm to the Central Bank of Ireland that they have undertaken due diligence in relation to all Pre-Approval Controlled Functions (“PCFs”).

The Board of Directors of DLL RE (the “Board”) will satisfy itself on reasonable grounds that a person has the necessary qualifications, knowledge and expertise to comply with the Fitness and Probity Standards before appointing that person to a control function position. The Board will not appoint a person to a PCF, until Central Bank has approved the appointment in writing.

The Company has adopted a Fitness and Probity Policy which sets out the due diligence checks that must be performed in accordance with the Central Bank of Ireland’s Guidance on Fitness and Probity Standards. The Company recognises the importance and value of these requirements and it has a system in place to review the ability, competence, skills and integrity of candidates for a position on the Board or for other Key Functions.

The selection and recruitment process for Key Function Holders (PCF’s) is as follows:

- A written job description outlining the duties and responsibilities for the role.
- An assessment of the level of fitness and probity required for the role.
- Advertisement of the position.
- Interview process to match suitable candidates to the specific role.
- Capture fitness and probity due diligence referred to below.
- Upon Central Bank of Ireland approval, letter of appointment issued, and training provided.

The process for assessing the fitness and the probity of the persons in PCF positions is summarised as follows:

- Interview and application.
- The Company conducts its own fitness and probity due diligence before proposing a person for appointment to a PCF. The due diligence required is referenced within the Central Bank of Ireland’s Guidance on Fitness and Probity Standards. The following is captured:
 - Evidence of a relevant professional qualification.
 - Confirmation of continuous professional development.
 - Evidence of professional membership of an organisation (where applicable).
 - Reference checks.
 - Review record of previous experience, including a review of curriculum vitae.
 - Record of experience gained outside the State (where applicable) – consider the extent to which the person can demonstrate competency that relates specifically to the function within the State.
 - Review of list of directorships and concurrent responsibilities.
 - Checks are also undertaken with the Regulator, Companies House and a judgment debt check is performed.
 - Signed Fitness and Probity declarations.
 - Completion of Individual Questionnaire.
- A PCF holder from the Company will review the Individual Questionnaire, complete a declaration on behalf of the Company and submit the Individual Questionnaire to the Central Bank of Ireland for assessment.
- As part of the continuing obligations, annual declarations are sought from all PCF’s, each PCF file is reviewed and an annual PCF return is submitted to the Central Bank of Ireland via the online reporting system.

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

B.3.1 Risk Management System

The primary objective of risk management within DLL RE is safeguarding financial stability. By controlling risks, DLL RE reduces the impact on capital and profitability from potentially undesired developments.

The Company is aligned with the DLL Group's risk management system. The Company has developed a set of risk policies to ensure that adequate process and procedures are in place to manage all types of risk. Additionally, DLL RE adopts three lines of defence as follows:

First Line	Second Line	Third Line
Management of business lines Measures, assesses and controls risk through the day-to-day activities of the business, within the frameworks set by the entity/board.	Risk Governance Provide independent oversight of the first line of defence. Report to Management and Board on risks associated with the company.	Internal Audit Sets the internal audit framework. Provides independent assessment of first and second lines of defence.

B.3.2 Implementation of risk management system

Within DLL RE, ultimate responsibility for the risk management rests with the Board of DLL RE who may decide to delegate responsibilities to others, as they feel appropriate. However, such delegation does not absolve them of their responsibility. The DLL RE Board recognizes the specialist nature of reinsurance risk assessment and desires to protect the company by combining internal expertise within the DLL Group with external resources available. Accordingly, the Board has appointed a Chief Risk Officer (CRO) and a DLL RE Risk Committee.

The Chief Risk Officer is responsible for the risk management function and for maintaining and monitoring the effectiveness of the DLL RE's risk management system. The nature, scale and complexity of the DLL RE's operations do not justify a dedicated exclusive CRO function. DLL RE has obtained the prior approval of the Central Bank prior to making this arrangement. The CRO of DLL RE's primary responsibility is to the Board and reports to the Board periodically with direct access to the Chairman of the board. The CRO also attends and reports to the DLL RE Risk committee on a regular basis.

DLL RE's risk identification is carried out by conducting a risk and control self-assessment (RCSA) which can be described as the process of identifying and measuring risks, and of developing and validating strategies to manage them.

The objective of this assessment is to identify risks, using a structured approach. This structured approach includes the following steps: identify risks, assessment of risks using a standardized scoring mechanism, identify controls when required and monitor and report on all risk and control activities. The last two steps ensure that risks are adequately followed up. DLL RE regards risk and control self-assessments as a key element of its Risk Management Framework and will conduct a RCSA on a regular basis.

DLL RE has a written Risk Appetite Statement (RAS) that for the material risks indicates the limits, tolerances of risks DLL RE is willing to take. As part of the RAS a framework is included regarding the approval process of the DLL RE RAS, the monitoring of the performance, breach management as well as annual review of the DLL RE RAS. Reporting on the risk appetite performance is performed on a quarterly basis and includes a forward-looking outlook of the expected development of the risk performance in addition to the current and prior period values. The report is discussed at the DLL RE Risk Committee who meets at least quarterly.

B.3.3 Own Risk and Solvency Assessment (ORSA) Process

The ORSA is a complete quantitative and qualitative solvency and risk assessment of DLL RE. DLL RE has developed its own processes with appropriate and adequate techniques, tailored to fit into its organisational structure and risk management system, and takes into consideration the nature, scale and complexity of the risks inherent to DLL RE as low rated PRISM entity.

The material risks are considered and stress and scenario testing, including reverse stress testing are carried out.

The ORSA process coincides with the Business Planning/Budget/Forecasting process. The ORSA Process commences at the beginning of Quarter 3 of each financial year. Draft results and a draft ORSA Report shall be presented to the DLL RE Board in Quarter 4 and at the same time the Business Plan for the upcoming financial year.

The forward-looking perspective is a key element of ORSA. Whereas quarterly reporting is based on one-year of business, the forward-looking perspective within the ORSA reflects the necessity for DLL RE to look beyond this one-year horizon in its assessment of how the Medium-Term Plan influences the overall solvency needs. The goal of the forward-looking assessment is to demonstrate that DLL RE will remain a going concern and has sufficient funds for the planned business scenario as well as in adverse scenario situations.

B.3.4 Frequency of ORSA

DLL RE shall perform an ORSA annually. A full or partial ORSA shall be performed if any event occurs or is expected to occur such that the risk profile of the Company is or will be materially changed. The ORSA is the responsibility of the DLL RE Board and reviewed annually.

B.3.5 ORSA and Solvency Requirements

DLL RE manages its capital base to achieve a prudent balance between maintaining capital ratios to support business growth, maintaining capital in line with Solvency Capital Requirements and delivering acceptable returns. It is DLL RE's strategy to only enter insurance programs that provide an acceptable balance between risk and reward and that enable the Company to further diversify its reinsurance portfolio geographically as well as in type of assets. While it is recognized that all participations carry risk, that risk must not endanger the overall stability of the company. In light of this DLL RE observes the following principles:

- Maintain a solid Solvency Ratio.
- Provide adequate sustainable Return on Capital.

When applying these principles, it is recognized that in any given year a series of individual loss events may occur resulting in losses which will challenge DLL RE's Return on Capital.

The capital management framework is designed to ensure that DLL RE is capitalised in line with its risk profile and regulatory requirements. The objectives of DLL RE's capital management are to:

- maintain sufficient capital resources to meet minimum regulatory capital requirements in accordance with Solvency II requirements.
- maintain sufficient capital resources to support DLL RE's risk appetite and other capital requirements.
- ensure DLL RE holds capital in excess of minimum requirements to achieve the target capital adequacy ratios set by the Board and to withstand the impact of potential stress events.

Results

The following table summarises the Company's forecast base case SCR position, using the Standard Formula, over a 3-year projection period ending 2026:

Solvency Position	31/12/2023	31/12/2024	31/12/2025	31/12/2026
Eligible Own Funds	96,358,230	112,492,065	123,712,760	134,550,295
SCR	50,945,379	58,230,050	61,305,328	63,887,922
Solvency Margin Cover	189.14%	193.19%	201.80%	210.60%

B.4 Internal Control and Compliance Function

B.4.1 Internal Control System

DLL RE relies heavily on the integrity of information supplied by counterparties. Although DLL RE works with reputable counterparties it must however be recognized that total reliance on the accuracy of counterparty information leaves DLL RE exposed to potential data errors.

The principal control framework for the Company is its controls set at Board level. These controls include the Board approved policies, reports, terms of reference, schedule of matters, and minutes of board meetings. The policies describe the Boards approach to key areas of the business. The Board is ultimately responsible for overseeing and maintaining the adequacy and effectiveness of the internal control system.

The Company has established the four key independent control functions required under the Corporate Governance Requirements for Insurance Undertakings - actuarial, internal audit, compliance and risk management. These functions are responsible for providing oversight of and challenge to the business and for providing assurance to the Board in relation to the Company's control framework.

Additionally, DLL RE has an internal control framework in place to evaluate the accuracy of information from counterparties for material DLL RE insurance programs.

This procedure is conducted on a high-level reconciliation basis and will provide the following:

1. A check on the accuracy of premium and claims information from counterparties.
2. A review of claims carried out by way of random selection of claims above a reasonable threshold level.

3. A claims ratio analysis conducted quarterly and provided to the DLL RE Risk Committee for review.

DLL RE in conjunction with DLL Corporate IT have developed a unique DLL RE Database. The purpose of this database is 1) to test data accuracy 2) to extract data for Technical Provisions and (3) perform other calculations.

B.4.2 Implementation of the compliance function

The Board supports the Compliance Function and shall make available such resource as is necessary. It provides access to all relevant documentation and information from the business for the Compliance Function to fulfil its role.

A Compliance Officer is appointed through a formal outsourcing arrangement with Artex Risk Solutions Limited who have responsibility for the Compliance Function. The Compliance Officer ensures the Company's continuing compliance in relation to its regulatory and legal obligations. It aims to minimise the risks to the Company of material financial loss or reputational damage arising from the potential failure to comply with legal or regulatory requirements. The Compliance Officer liaises with regulatory bodies and authorities and provides updates on changes in legislation and regulatory requirements.

The Compliance Officer has responsibility for the implementation of the Company's Compliance strategy and effective compliance processes and is responsible for the monitoring, managing and reporting of compliance risks to which the Company is exposed. It ensures that arrangements are sufficiently robust, proportionate, effective and efficient. The Compliance Officer is responsible for identifying and evaluating compliance risk, overseeing the implementation of controls for the risks identified, and monitoring their efficiency through Compliance monitoring.

Compliance auditing occurs to check that the Company is adhering to its obligations. Compliance reports are issued to the Board assessing the effectiveness and adequacy of compliance within the Company. The activities of the Compliance function are subject to periodic reviews by Internal Audit and DLL Group Compliance.

On an ongoing basis, the Compliance Officer strives to ensure that there is an organisational culture in place which promotes a high standard of integrity and regulatory compliance.

B.5 Internal Audit Function

B.5.1. Implementation of the internal audit function

The internal audit function of DLL RE is outsourced to the Internal Audit Department of the DLL Group, with prior approval of the Central Bank of Ireland.

The scope of work of DLL Internal Audit is to provide independent assurance, advice and insights to the Board and management on the quality, efficiency and effectiveness of DLL RE's governance, risk management and internal control systems and processes.

The internal audit function forms part of the Third Line of Defence is objective and impartial in performing its assignments and is not subject to instructions from the Board when evaluating and reporting on audit results.

Internal Audit discuss their findings with the management team of DLL RE on completion of the audit, they will prepare a written report on each audit assignment. The report is submitted

to the DLL RE Management Team for a written management response. The final audit report is submitted to the Audit Committee and the Board of DLL RE with an overall rating.

The Company is on an annual audit cycle as agreed with Internal Audit and approved by the Board.

B.5.2. Independence of the internal audit function

Internal Audit De Lage Landen is an independent internal audit function within the governance structure of De Lage Landen International B.V. It provides assurance regarding the adequacy and efficiency of processes, the related internal control framework and management information. The internal auditor reports to the chair of the DLL RE Audit Committee, which is an independent non-executive director role.

B.6 Actuarial Function

The Head of Actuary Function is outsourced to KPMG. KPMG's actuaries attend board meetings on a regular basis and receive regular updates on claims activity. The Company's Technical Provisions are subject to an annual review with a report presented detailing the Head of Actuary Function's Best Estimate claims reserves and Solvency II Technical Provisions.

The responsibilities of the Actuarial Function are in line with guidance from the Central Bank of Ireland and the Society of Actuaries and include but are not limited to implementing and/or overseeing the following:

- Coordinate and oversee the calculation of technical provisions.
- Ensure the appropriateness of the methodologies and underlying models used as well as the assumptions made in the calculation of technical provisions.
- Assess the sufficiency and quality of the data used in the calculation of technical provisions.
- Compare best estimates against experience.
- Inform the administrative, management or supervisory body of the reliability and adequacy of the calculation of technical provisions.
- Express an opinion on the overall underwriting policy.
- Express an opinion on the adequacy of reinsurance arrangements.
- Contribute to the effective implementation of the risk-management system, with respect to the risk modelling underlying the calculation of the capital requirements and assessment.

Additionally, DLL RE utilises the services of an external actuarial company, Barnett Waddingham, who provide DLL RE with quarterly support on actuarial reserving for material lines of business.

B.7 Outsourcing

The Company adheres to the DLL RE Standard on the Management of Outsourcing and Cloud Risk the purpose of which is to establish the requirements for identifying, justifying, and implementing outsourcing arrangements for the Company's critical or important operational functions or activities. This policy has been approved by the Board. The Board ensures that an outsourcing arrangement shall not diminish the Company's ability to fulfil its regulatory obligations.

The Outsourcing Policy sets out the following:

- Definition of outsourcing

- Outsourcing risks
- Risk mitigation
- Board and management responsibility
- Assessment and due diligence on Outsourced Service Provider
- Essential requirements for inclusion in Service Level Agreements
- Management and oversight of Outsourced activities
- Reporting requirements
- Table of Outsourced Service Providers
- Business continuity and contingency planning

The Company only enters an Outsourcing arrangement where there is a sound commercial basis for doing so and where it can be effectively managed. A full due diligence process is undertaken prior to any final decision being made as to whether to outsource a material business activity. In undertaking this assessment, the Company adheres to the Central Bank of Ireland Notification Process for (Re)/Insurance Undertakings when Outsourcing Critical or Important Function or Activities under Solvency II Regulations.

The Board appointed a member of the management team to act as the designated PCF with responsibility for all outsourced key functions.

The following is a list of the critical or important functions the Company has outsourced and the jurisdiction in which the Outsourced Service Providers are located:

Outsourced Activity	Outsourced Provider	Jurisdiction
Actuarial Function	KPMG	Ireland
Actuarial Services	Barnett Waddingham	UK
Compliance Function	Artex Risk Solutions (Ireland) Limited	Ireland
Management Accounting	Artex Risk Solutions (Ireland) Limited	Ireland
Company Secretarial	Artex Risk Solutions (Ireland) Limited	Ireland
Solvency II Reporting	Artex Risk Solutions (Ireland) Limited	Ireland
Tax iXBRL Conversion	KPMG	Northern Ireland

The internal audit function of DLL RE is outsourced to the Internal Audit Department of the DLL Group and the Chief Risk Officer function is provided by DLL Integrated Risk. Both roles have approval of the Central Bank of Ireland.

The Company is in scope for the Digital Operational Resilience Act (DORA) and is focusing on key areas to ensure digital operations are resilient and secure by the due date.

B.8 Assessment of governance and any other disclosure

DLL RE's system of governance is tailored to fit into its organisational structure and risk management system, and takes into consideration the nature, scale and complexity of the risks inherent to DLL RE as low rated PRISM entity.

There is no other material information regarding the system of governance of the Company.

C. Risk Profile

DLL RE is exposed to a wide variety of risks, which have an impact on DLL RE's business objectives. This section describes the main risks to which the Company is exposed through its business.

DLL RE is using the standard formula to quantify its solvency capital requirements (SCR). At year-end 2024 the Company's solvency capital requirement amounted to €54,310k. The composition of the standard formula SCR risk charge at 31 December 2024 is shown in the table below, with underwriting and market risk being the key drivers of the risk charge.

Solvency Capital Requirement Sub Module	2024 €'000	2023 €'000	Movement
Non-life Risk	36,708	40,572	(3,864)
Health Risk	-	48	(48)
Market Risk	32,704	27,965	4,739
Default Risk	964	1,206	(243)
Operational Risk	1,740	1,495	246
LACDT	(2,832)	(5,898)	3,066
Diversification	(14,974)	(14,443)	(531)
Total SCR	54,310	50,945	3,365

C.1 Underwriting Risk

C.1.1 Description of the measures to assess underwriting risk

Underwriting Risk refers to the risk of loss, or of adverse change in the value of Insurance Liabilities, due to inadequate pricing and/or reserving assumptions which includes the fluctuations in the timing, frequency and severity of insured events, relative to the expectations of DLL RE at the time of underwriting. Underwriting risk arises from two sources, adverse claims development (reserve risk) and inappropriate underwriting (premium risk). Underwriting risk is managed by having in place a clear underwriting philosophy, procedures and controls in relation to new program authorisation criteria and diversification of risks.

DLL RE has in place underwriting procedures adopted by the Board which outlines the roles, responsibilities, insurance procedures and reporting requirements within DLL RE to enable the management of underwriting risk in line with the limits and tolerances set out in DLL RE's Risk Appetite Statement.

DLL RE's underwriting year varies by line of business. Although the term of the underlying insurance policies can range from 12 months to 75 months, all reinsurance policies underwritten by DLL RE are written on an annual basis, with automatic renewal of policies if they are not cancelled within a specified timeframe.

When considering any proposed new line of business, the management team prepares an underwriting application for presentation to and approval by the Risk Committee. Each existing program is subject to an annual review by the Risk Committee to assess the performance of the program to date and provide recommendations for future actions.

C.1.2 Description of the material underwriting risks

The main underwriting risk present in DLL RE's portfolio is premium and reserve risk and catastrophe risk. By setting a maximum loss limit and having effective underwriting procedures, DLL RE protects its solvency position and the profitability of the company.

C.1.3 Concentration risk

Underwriting concentration risk is limited due to the spread of classes and jurisdictions. Concentrations of risk may arise as DLL RE only writes reinsurance business for the DLL Group and selected vendor partners. DLL RE does not have established any open-market reinsurance relationships. This is mitigated by way of the quota share arrangements in place and the submission of an underwriting application for each proposed line of business which considers the geographical spread of a program as well as its potential to result in an aggregation of exposure within the portfolio.

C.1.4 Risk mitigation techniques used for underwriting risks

When considering any proposed new line of business, the Management Team prepares an underwriting application for presentation to and approval by the Risk Committee. The Underwriting Application must include at a minimum the following details:

- Counterparties with specific reference to credit rating by a leading ratings agency, reputation and expertise.
- Portfolio details to include insured object profile, geographical spread, historical premium and claims data, potential trends and probable underwriting performance.
- Reinsurance structures and proposed reinsurance share.
- The premium volume and its relationship to risk/volatility.
- Existing Exposures which may reasonably be expected to aggregate to those risks assumed under the proposed program.
- Solvency Capital Requirements and any impact arising from execution of the proposed program.
- Evaluation of standard risks to include Solvency, Profitability, Underwriting, Concentration, Credit, Liquidity, Currency, Compliance, Operational and Reputational.

Additionally, DLL RE does not accept an Average Combined Ratio over a specific period to be above acceptable limits. DLL RE monitors the average combined ratio and on a quarterly basis and this is reported to the Risk Committee.

Retrocession is currently not utilised by the Company however it may be used by the Company as a secondary measure to limit its net exposures. The Company primarily seeks to limit its exposure to an optimal level by limiting that risk which is assumed from the Reinsured. It is the responsibility of the DLL RE management team and the Risk Committee to determine if retrocession should be arranged for any existing or new business proposal. In the event of retrocession being required it is Company policy to follow the minimum credit ratings as set out in the Risk Appetite Statement of DLL RE.

C.2 Market Risk

C.2.1 Description of the measures to assess market risk

DLL RE's investment portfolio consists of a mix of cash and deposit accounts. It is Company policy to maintain investments in separate cash deposits internally within the Rabobank Group and externally with other banks (pre-approved counterparties).

C.2.2 Description of the material market risks

The main market risks present in the Company are interest rate risk and translation risk. Interest rate risk is the exposure of DLL RE's financial condition to adverse movements in interest rates. DLL RE aims to earn the highest possible rate on deposits whilst accepting that the options available for investment are limited by DLL Group minimum requirements. The

board of directors of DLL RE adheres to the DLL Group Policy in relation to equity investments, which will be annually reviewed by the DLL Group Asset and Liability Committee.

Translation Risk is defined as the exposure of the company's financial condition to movements in foreign exchange rates. All foreign exchange deals must be transacted with DLL Group Treasury or where there are local regulatory constraints at least with the approval of DLL Group Treasury. Transaction risk can be hedged if DLL Group Treasury knows in advance the timing and the amount of the payment/receipt. DLL RE's policy is to reduce foreign exchange risk by having limits in place.

C.2.3 Investment assets and prudent person principle as applied to market risks

The Company verifies the appropriateness of credit assessments from external credit assessment institutions by (i) always obtaining a credit rating where available from one of the four main rating agencies (AM Best, S&P, Moody's and Fitch) and (ii) relying on its own market knowledge, including input from Group Treasury. Credit assessments from credit assessment institutions are used in assessing minimum security requirements for investment counterparties.

C.2.4 Concentration risk

DLL RE maintains separate cash deposits internally within the Rabobank Group and also with an external bank. Both counterparties have an A+ stable rating by a leading ratings agency and have stable outlooks.

C.2.5 Risk mitigation techniques used for market risks

DLL RE's translation risk policy seeks to protect DLL RE against exchange rate fluctuations. Translation Risk is defined as the exposure of the company's financial condition to movements in foreign exchange rates.

DLL RE conducts business with many companies in differing jurisdictions and with differing base currency. In all cases, the currency of the liability will be determined by the underlying policy/treaty. To protect existing business, it is the policy of the Company to maintain assets in the same currency as the corresponding liability.

In minimizing DLL RE's exposure to FX risk, DLL RE will hedge DLL RE's forecasted material FX annual earnings, with the objective of achieving our EUR budget translation rate (or better).

C.3 Credit Risk

C.3.1 Description of the measures to assess credit risk

Credit risk is the risk of loss or of adverse change in the financial situation resulting from fluctuations in the credit standing of counterparties to which reinsurance undertakings are exposed, in the form of counterparty default risk. DLL RE's policy intends to limit this credit risk to an acceptable standard.

C.3.2 Description of the material credit risks

The largest credit risk exposure for the Company arises from the counterparties holding the company's assets.

C.3.3 Risk mitigation techniques used for credit risks

Credit risk is managed by carrying out appropriate due diligence on prospective counterparties and having limits in place.

For third party insurance companies 90% of DLL RE's portfolio shall be placed with companies who have an investment rating of S&P "BBB" or better (or the equivalent).

For third party banks, all cash deposits will be placed with banks who have an investment rating of S&P “BBB” or better (or the equivalent).

Credit ratings of counterparties are reviewed and monitored quarterly by the Risk Committee.

In the event DLL RE wants to deviate from these guidelines, this will be subject to approval from the DLL RE Board and the impact on Solvency requirements evaluated.

C.4 Liquidity Risk

C.4.1 Description of the measures to assess liquidity risk

Liquidity risk is the risk that the Company is unable to realise investments and other assets in order to settle their financial obligations where they fall due. DLL RE’s liquidity policy seeks to ensure that there is always sufficient cash available to settle its financial obligations.

C.4.2 Description of the material liquidity risk

None.

C.4.3 Risk mitigation techniques used for liquidity risks

DLL RE ensures that amounts of available / readily accessible cash is always higher than the early warning limit of €7,500k. This is reported quarterly to the Risk Committee.

Additionally, an overview of the investments and liquidity position of the Company is a standing item on the DLL RE Board agenda.

C.4.4 Expected Profit Included in future premiums

The expected profit in future premiums is €5,254k.

C.5 Operational Risk

C.5.1 Description of the measures to assess operational risk

Operational Risk covers losses resulting from inadequate or failed internal processes, people, systems, or from external events.

C.5.2 Description of the material operational risks

DLL RE does not consciously take on these types of risks but only tolerates these risks as an inevitable part of executing business activities.

C.5.3 Risk mitigation techniques used for operational risks

DLL RE falls within the scope of DLL Group Operational Risk Management as well as DLL Group’s Information Security Policy. DLL RE does not accept an aggregate operational risk net loss that exceeds 2% of budgeted annual gross income.

For a single event loss, the maximum tolerated loss has been set at:

Operational Risk ORM losses (EUR)	EWL	RAL
Net loss amount year to date (per quarter)	300,000	460,000

In addition, an operational resilience framework is in place for the Company. Critical and important business services were identified to enable DLL RE to clearly determine impact tolerances based on maximum tolerable periods of disruption, perform mapping of the end-to-

end delivery of the business service, including any dependence on third parties, and tested based on severe but plausible scenarios.

C.6 Risk Sensitivities

DLL RE undertakes an annual forward-looking stress/scenario analysis as part of the ORSA process. A range of scenarios are considered encompassing different events and degrees of severity. DLL RE scenarios will:

- Address the main risk factors DLL RE is exposed to
- Address DLL RE specific vulnerabilities (sectoral characteristics, business line exposures, concentration risk)
- Be forward looking and include severe outcomes. The time horizon should reflect the characteristics of the business.
- Identify interdependencies if these exist.

This section presents the results of the stress test on DLL RE's financial outlook 2024 to 2026 in term of impact on capital. The scenarios are selected annually by the management team and circulated to the Risk Committee and Head of Actuary for approval. The impact is measured comparative to a base case scenario which is derived from the mid-term plan projection 2024-2026. A summary of the scenario testing results has been provided by risk category in the table below.

Scenario Description	Method	Outcome
Scenario 1 Macro Economic Risk and Climate Risk Claims across material programs increase and new business volumes for these programs decline. This is combined with a major climate event impacting the US programs in year 1 (2025) and the a program in Europe has a major claims event in year 2 (2026).	The following assumptions were applied: Macro Economic Risk Assumptions •20% uplift in loss ratios for 2025 and beyond •20% decrease in GWP for 2025 and beyond Climate Risk Assumptions •US Hurricane impacts a program in Other Motor (event equates to c.a. €8.7m) •Max exposure loss relating to another US Program in 2025 for Flood event •A major Pan-European Program suffers a €2m flood loss in 2026 •In addition a program located in Italy suffers a hail/flood event for €1m in 2026	This is a severe scenario. These events have an immediate impact on Technical Provisions with a dramatic increase of €6,430k in 2025 (base case €63,446k versus €69,875k). This is due to an increase in claims provisions, an increase in the loss ratio and increase in premium provisions. In 2026 Technical Provisions increase by €2,640k (base case €62,753k versus €65,394k), demonstrating that a weather related event in Europe is less severe. This combination of events results in a reduction in the solvency margin cover from 201.80% (base case) to 177.73% in 2025 and from 210.60% (base case) to 180.66% in 2026. This demonstrates the Company can withstand severe climate events in the US and Europe combined with negative macro-economic events.
Scenario 2 Reverse Stress Test Decrease premium volumes and increase loss ratios to project the maximum DLL RE can absorb before breaching regulatory capital requirements (exhaust available own funds).	• For a material program in the USA base case loss ratio is 48.5% and in this scenario the loss ratio is increased to 109% (101.6% uplift) and is applied to existing and new business. • Simultaneously a decrease of 20% in Gross Written Premium is applied to the period 2025-2026.	The Solvency Margin Cover decreases from 201.80% (base case) to 100% in 2025. The Solvency Margin Cover deteriorates further in 2026 to 88.1% (base case 210.60%). This assumes that no program performance mitigation strategies have been put in place.
Scenario 3 Credit Rating downgrade and change in mix of investments Assess the impact of a ratings downgrade of Rabobank and the external bank.	•Rabobank and external banks are downgraded from credit quality step 2 to 3 (equivalent to moving from S&P rating of A to BBB). This change is for 2025 and 2026 only.	The downgrade of Rabobank and external bank from credit quality step 2 to 3 increases the SCR capital charge by €8,083k for 2025 and €8,535k for 2026 compared to the base case. The sub-modules impacted by this scenario are Market Risk and Default Risk. This is driven by the fact that DLL RE has a large concentration of deposits with Rabobank. The Solvency Margin Cover is materially impacted across all years i.e. 201.80% base case to 178.29% for YE 2025 and from 210.60% base case to 185.78% for YE 2026.

C.7 Other Material Risks

Letter of Credit Availability Risk

One of the main risks for DLL RE is the availability of Letters of Credit ('LoC'). As an unrated entity access to well rated Letter of Credit Capacity is a necessary commercial requirement for DLL RE to secure its existing liabilities to 3rd parties and may act to limit its ability to pursue new opportunities. Unavailability of LoC's could have a very negative effect on DLL RE's ability to undertake business. Ongoing availability of LoC's is therefore a regular agenda item and consideration for the DLL RE Risk Committee.

Compliance Risk

Compliance risk is the risk arising from incomplete, ineffective or inaccurate contractual documentation noting also the relevance of fiscal or regulatory requirements and foreseeable future events, which would trigger subsequent comprehensive attention. DLL RE always seeks to operate in compliance with all applicable laws and regulations. In particular, it works to adhere to the rules relating to behaviour and prudent supervision as this is a key element within the DLL/Rabobank Group. The compliance officer shall ensure that DLL RE complies with local Irish matters. The international aspects of compliance and in particular compliance with DLL Group requirements are subject to the Group Code of Conduct and the employees of DLL RE are responsible to act in compliance with this Code.

HR Risk

The employees of DLL RE are a critical success factor to realize its ambitions. DLL RE is a small operation and is therefore vulnerable to movements in its personnel. It remains important for DLL RE to maintain proper succession planning. In addition, integrity is a key value. Under no circumstances will fraud perpetrated by employees or by customers be tolerated. However, as the business is conducted by humans, fraud within the organization cannot be ruled out. Annual training is provided (as part of DLL Group training) to create and maintain awareness for compliance as well as fraud risks. DLL Group follows a balanced remuneration policy benefitting its strategy, risk appetite, objectives, values and country specifics. The policy considers the global perspective with some local factors. DLL RE falls within the scope of this Group HR policy.

Business Continuity Risk

By organizing Business Continuity Management (“BCM”) the DLL Group aims to reduce to an acceptable level the consequences of internal or external disturbances on the processes of the organization. DLL RE falls within the scope of the DLL Group BCM and has a BCM cycle operative.

Outsourcing Risk

DLL RE has chosen to outsource certain key activities. The advantages of out-sourcing include supplementing limited internal resources as well as accessing expertise. The risks of out-sourcing include poor planning, oversight and controls exercised by DLL RE over the party, which might result in misunderstandings as to scope of work or problems in service quality. In deciding to out-source an activity, DLL shall endeavour to strike an optimal balance between doing activities in-house and outsourcing other activities. DLL RE adheres to all laws and regulations and additionally falls within the scope of the DLL Group Standard on the Management of Outsourcing and Cloud Risk and will ensure there are adequate processes in place for third party selection, supervision, control, monitoring and contingency planning.

Any other disclosures

There is no other material information regarding the risk profile of the Company during the reporting period.

D. Valuation for Solvency Purposes

D.1 Assets

D.1.1 Solvency II valuation for each material class of asset

The following table analyses the Company's financial assets at 31.12.2024. For information purposes the figures at 31.12.2023 are also provided.

Balance Sheet Assets	2024 €'000	2023 €'000	Movement €'000
Deposits other than cash equivalents	170,833	144,709	26,124
Receivables (trade, not insurance)	0	22	-22
Cash and cash equivalents	12,785	16,972	-4,187
Any other assets, not elsewhere shown	44	34	10
Insurance and intermediaries receivables	0	566	-566
Total Assets	183,662	162,304	21,358

The Company continues to place cash on short term deposits moving cash from Cash and cash equivalents to Deposits other than cash equivalents to maximise investment income.

The following are the Company's assets at 31 December 2024 as reported under FRS and as valued in accordance with the Solvency II Directive with the main differences identified.

Balance Sheet Projection	Valuation per FRS 31/12/2024	Valuation per SII 31/12/2024	Difference	Valuation per FRS 31/12/2023	Valuation per SII 31/12/2023	Difference
Deposits other than cash equivalents	126,566	170,833	-44,267	138,470	144,709	-6,239
Cash and cash equivalents	55,248	12,785	42,463	20,880	16,972	3,908
Receivables (trade, not insurance)	0	0	0	0	22	-22
Any other assets, not elsewhere shown	1,797	44	1,753	2,366	34	2,331
Deferred acquisition costs	9,121	0	9,121	9,015	0	9,015
Insurance and intermediaries receivables	5,034	0	5,034	2,526	566	1,960
Total assets	197,766	183,662	14,104	173,256	162,304	10,952

D.1.1.1 Deposits other than cash equivalents

Deposits other than cash equivalents are the Company's term deposits with Rabobank and the external bank. These are short term deposits with a duration of less than one year. At year-end the Company had several deposits with a duration of less than three months. Under FRS these are classified under Cash and cash equivalents, whereas under Solvency II these remain classified as Deposits other than cash equivalents.

Any non-Euro deposit is valued at the amount held at the reporting period end, translated using the year-end exchange rates.

D.1.1.2 Receivables (trade, not insurance)

The Company has no receivables (trade, not insurance) at the reporting year end.

D.1.1.3 Cash and cash equivalent

FRS compared to Solvency II valuations show a difference of €42,463k. Under FRS Cash and cash equivalents comprise of cash balances and short-term deposits with maturity dates less than three months, whereas under Solvency II these remain classified as Deposits other than cash equivalents.

D.1.1.4 Any other asset, not elsewhere shown

Other assets refer to prepayments of the Company's administration fees and VAT. The difference of €1,753k relates to accrued income and under FRS this is allocated to accrued income.

D.1.1.5 Insurance and intermediaries receivables

Under FRS, the amount of €5,034k is the net position of premiums due that are in excess of claims payable to cedants. Under Solvency II Insurance and intermediaries receivables are captured in the Technical Provisions. If expired it is reported under claim provisions and if unexpired it is reported under premium provisions.

D.1.2 Differences between Solvency II Valuation and local FRS valuation by material class of asset

The two material classes of assets are as follows:

- Deferred acquisition costs are not included in the Solvency II balance sheet.
- Under Solvency II premium receivables are classified as either expired or unexpired risks within the Technical Provisions.

D.2 Technical Provisions

D.2.1 Technical provisions analysed by each material line of business

Below table displays the difference between the Best Estimate Reserve under FRS and the booked FRS Reserve:

Segment	Best Estimate Reserves €'000	FRS Reserves €'000	Difference €'000
Other motor insurance	5,577	8,842	3,265
Miscellaneous financial loss	247	1,115	868
Fire and other damage to property insurance	530	1,540	1,010
Motor vehicle liability insurance	3,627	3,517	(110)
Income protection insurance	-	-	-
Total	9,981	15,014	5,033

The difference of €5,033k is comprised of:

- €3,615 k is the difference in Best Estimate between Solvency II and FRS booked reserves
- €1,418k is the booked margin over the FRS booked reserves

The Technical Provisions comprise the Best Estimate of Liabilities and the Risk Margin. At the 31.12.2024 the Technical Provisions are:

DLL RE Movements in Technical Provisions from Accounting basis to SII for 2023																
€000's	Claims Provision						Premium Provision									
	Best Estimate Reserves	ENIDs	Expenses	Discounting	Premium Receivable s - Claims Provisions	Claims Provision	PP Claims	Future Premium less Commission	Future Return Premi u m	ENIDs	Expenses	Discounting	Premium Provision	Discount ed SII TP Excl RM	Risk Margin	Total Net SII TP
Other motor insurance	4,145	124	478	(148)	(91)	4,509	35,139	(39,456)	32,554	13,023	4,056	(3,926)	41,390	45,899	5,675	51,574
Miscellaneous financial loss	461	14	53	(18)	(1)	509	1,768	(1,224)	231	233	204	(72)	1,140	1,649	244	1,893
Fire and other damage to property insurance	953	29	110	(13)	(475)	604	4,926	(10,091)	-	583	569	195	(3,819)	(3,215)	765	(2,450)
Motor vehicle liability insurance	5,049	151	583	(404)	-	5,379	-	-	-	-	-	-	-	5,379	446	5,825
Income Protection insurance	102	3	12	(3)	-	114	-	-	-	-	-	-	-	114	9	123
Total	10,710	321	1,236	(586)	(566)	11,115	41,833	(50,771)	32,786	13,838	4,828	(3,803)	38,711	49,825	7,140	56,965

DLL RE Movements in Technical Provisions from Accounting basis to SII for 2024																
€000's	Claims Provision						Premium Provision									
	Best Estimate Reserves	ENIDs	Expenses	Discounting	Premium Receivable s - Claims Provisions	Claims Provision	PP Claims	Future Premium less Commission	Future Return Premi u m	ENIDs	Expenses	Discounting	Premium Provision	Discount ed SII TP Excl RM	Risk Margin	Total Net SII TP
Other motor insurance	5,577	167	709	(188)	(473)	5,793	30,116	(13,580)	23,704	10,702	3,829	(5,026)	49,745	55,538	4,896	60,434
Miscellaneous financial loss	247	7	31	(7)	(0)	278	2,203	(754)	203	205	280	(94)	2,044	2,322	312	2,634
Fire and other damage to property insurance	530	16	67	(5)	(456)	151	4,113	(9,308)	-	505	523	185	(3,983)	(3,832)	538	(3,294)
Motor vehicle liability insurance	3,627	109	461	(213)	-	3,984	-	-	-	-	-	-	-	3,984	510	4,495
Income Protection insurance	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total	9,981	299	1,269	(413)	(930)	10,207	36,432	(23,642)	23,907	11,412	4,632	(4,936)	47,805	58,012	6,256	64,269

The Technical Provisions have increased by €7,304k since year end 2023.

Segmentation

The Technical Provisions analysis is performed at a program level. The programs are not unbundled. Each program is mapped to a Solvency II line of business.

Claims Provision

DLL RE calculates the Claims Provision as the discounted best estimate of all future cash flows relating to claims events prior to the valuation date. Claims Technical Provisions are determined using standard actuarial techniques including the Chain Ladder, Bornhuetter-Ferguson and Loss Ratio methods where appropriate.

The claims provision for 2024 has decreased by €907k. This decrease is largely driven by the Best Estimate reserve, with an increase in Other Motor Insurance of €1,433k offset by a release of €2,161k in reserves in all other segments, mainly in the Motor Vehicle Liability Insurance and Fire and Other Damage to Property Insurance.

The main components of the Claim Provisions are:

- Best Estimate Reserves**
 The Claims Provision is the discounted Best Estimate of all future cash flows relating to claim events prior to the valuation date. Salvage and subrogation are not a feature of DLL RE's claims cash flows. There is a reduction of €729k in the Best Estimate at year end 2024.
- ENIDs**
 The Claims Provision includes an allowance for ENIDs which is based on a 3% uplift to the Best Estimate claims reserve. An ENID of €299k is in place at the valuation date, a reduction of €22k since year end 2023.
- Expenses**
 Across all programs the claims handling expenses are included in the commission and netted off the premium cash flow. Therefore DLL RE is not exposed to any future claims handling liabilities which have not already been accounted for in the commission.

The overhead expense ratio that is included in the Claims Provision is based on an average of the 2024 expenses to claims paid ratio and the planned 2025 expenses to claims paid ratio. The expenses include administration expenses and head office recharges.

- *Premium Receivables – Claims Provisions (Future Premiums)*

Future premiums are a material input to the Technical Provisions. Future premiums in the claim provision calculation relates to expired business yet to be received by DLL RE at the valuation date. The amount identified at the valuation date is €930k and increase of €363k on year end 2023. These premiums are not considered overdue by DLL RE and are included within the claims provisions.

Premium Provision

The premium provision at 31 December 2024 is €47,805k and it has increased by €9,094k on year end 2023.

The main component of the premium provision is unexpired and written but not yet incepted business for a number of programs of €36,432k. As a result, premium provisions movements are predominately driven by increases across both the unearned and written but not yet incepted business movements.

The premium provision calculation is also made up of future premium receivables less commissions of €23,642k, an allowance for future lapses of €23,907k, an allowance for ENIDs of €11,412k, an allowance for future expenses of €4,632k and an allowance for discounting of €4,936k. Other components of the premium provision are as follows:

- *Contract Boundaries*

The contract boundaries principle aims to define when an existing contract ends and a new one begins. The premium bound each year considers the policy anniversary, how far in advance the premium is considered to be bound and assumes premium is earned in line with the underlying contracts.

Each program has a distinct contract boundary, with underlying insurance policy terms ranging from 12 to 75 months. All underlying programs were reviewed in 2024 and as a result there has been a significant reduction in the premium included in the Premium Provision. The movement in the period is a positive €27,129k.

- *Lapse rates*

The Premium Provision is adjusted for expected lapse rates and corresponding return premiums and commission clawback. There are four programs where cancellations and return premiums are a significant feature of the business. Future Return Premiums have decreased from €32,786 to €23,907k for the period.

- *Options and Guarantees*

Contracts with “optionality” e.g. cancellations, mid-term adjustments etc., are valued using full cash flows for the duration of the “option” period.

- *Payment Patterns and Discounting*

Future claims settlement cash flows for both the Claims and Premium Provisions were modelled using payment patterns based on DLL RE’s actual historical claims experience combined with Expert Actuarial Judgement. These were discounted using the appropriate yield curves by currency as published by EIOPA in December 2024.

- *Premium receivables and commissions payable in respect of unexpired exposure*
Programmes are settled on a net basis so there is no explicit premium receivable on the balance sheet. Instead the amount on the balance sheet is the balance of payments either due from each cedant or owed by DLL RE. These amounts are adjusted when transitioning from statutory reporting to the Solvency II balance sheet to allow for the receivables and payables included in the Premium Provision.
- *ENIDs*
A Premium Provision ENID loading of 13% is applied to a material program in the Other Motor Segment, given the business planning assumption uncertainties associated with the increasing levels of claims inflation. For all other lines, a Premium Provision ENID loading of 5% has been selected as these programs are typically of a shorter term and are subject to less uncertainty.

The Solvency II Technical Provision's include an ENIDs allowance of €11,412k based on a 13% uplift (for a material program in the Other Motor Segment only) and a 5% uplift (for all other programs).

- *Expenses*
Across all programs the claims handling expenses are included in the commission and netted off the premium cashflow. Therefore DLL RE is not exposed to any future claims handling liability which has not already been accounted for in the commission.

Acquisition and other underwriting expenses are contractually defined between DLL RE and the cedants and/or brokers (where applicable) and they are included based on planned 2025 projections in the calculation of the Premium Provision.

The overhead expenses included in the Premium Provision are based on an average of the 2024 expenses to claims paid ratio and the planned 2025 expenses to claims paid ratio. The expenses include administration expenses and head office recharges.

Reinsurance – Premiums and Recoveries

DLL RE does not have any retrocession in place.

Risk Margin

The Company has used Method 2 from Guideline 61 of the Solvency II 'Guidelines on the valuation of technical provisions'. This involves approximating the whole SCR for each future year, inter alia by using the ratio of the best estimate at that future year to the best estimate at the valuation date. This results in a risk margin of €6,256k at 31 December 2024.

D.2.2 Uncertainty associated with the value of technical provisions

The key sources of uncertainty for the Company are expenses, policyholder behaviour assumptions and changes in local legislation.

D.2.3 Differences between Solvency II valuation and local Financial Statements (FRS) valuation of Technical Provisions analysed by each material line of business

The Technical Provisions in the financial statements are shown as an amount of €100,267k. This is made up of a provision for unearned premium €85,253k, an IBNR reserve of €11,485k, and an outstanding loss reserve of €3,529k. There was no additional unexpired risk reserve reported in 2024.

The differences between Solvency II valuation and the FRS valuation of technical provisions is mainly due to premium provisions (FRS €85,253k versus Solvency II €47,805k). The

Solvency II difference is comprised of the following: the exclusion of deferred acquisition cost, the inclusion of written but not incepted premiums, future return premium estimates, ENIDs/expense loadings, premium receivables and an allowance for discounting.

D.2.4 Matching adjustments

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

D.2.5 Volatility adjustments

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

D.2.6 Transitional risk-free interest rate-term structure

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

D.2.7 Transitional deduction

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

D.2.8 Recoverable from special purpose vehicles

Not applicable to the Company.

D.3 Other Liabilities

At the 31st December 2024 the Company recorded the following classes of other liabilities for solvency purposes:

- DLL RE has recorded a claims payable amount of €1,135k. Under FRS this is €271k which is net payables in excess of premiums due.
- DLL RE has recorded a deferred tax liability of €2,832k at the end of the reporting period arising due to the change in the basis of valuation in FRS Financial Statements and Solvency II principles. The Loss Absorbing Capacity for deferred Tax has been capped at the deferred tax liability on the Solvency II balance sheet. This DLL RE considers to be a prudent approach.
- An amount of €307k refers to expense accruals, there is no difference between the FRS and Solvency II balance sheet.

D.4 Alternative methods for valuation

Not applicable for the Company.

D.5 Any other information

No further information.

E. Capital Management

E.1 Own Funds

E1.1. Objectives, policies and processes for managing own funds

DLL RE seek to maintain sufficient own funds to cover Solvency Capital Requirements at all times. The management team review the ratio of eligible own funds over SCR and MCR at least quarterly. The Board is provided with this overview at each Board Meeting. As part of own funds management, the Company prepares an Own Risk and Solvency Assessment exercise at least annually, or when the risk profile of the Company changes. The ORSA exercise incorporates the business planning process which is typically a three-year time horizon.

The Company's own funds are as follows:

Own Funds Solvency II	2024 €'000	2023 €'000
Paid up share capital	4,635	4,635
Other reserves	365	365
Profit and loss account	91,718	72,797
Reconciliation reserve	18,401	18,561
Basic own funds	115,120	96,358

The Company's own funds are invested in cash or short-term deposits. There is no intention to change the disposition of own fund items at this time. No dividend has been paid to the parent in the reporting period and no dividend has been paid since the establishment of the Company.

Own funds are comprised of paid-up share capital, other reserves, profit and loss retained earnings and the reconciliation reserve. The reconciliation reserve represents the differences between the equity in the financial statements and the excess of the assets over liabilities as calculated for Solvency II purposes during the reporting period.

E1.2 Own Funds classified by tiers

The Company's available own funds by Tier are as follows:

Own Funds by Tier	2024 €'000	2023 €'000
Tier 1 Basic Own Funds (unrestricted)	115,120	96,358
Eligible Capital for SCR	115,120	96,358

All Own Funds for the Company are Tier 1.

E1.3 Eligible amount of own funds to cover the Solvency Capital Requirement, classified by tiers

The eligible own funds available to meet the SCR is €115,120k. The SCR ratio is calculated at 211.97% at 31st December 2024 (189.14% at 31st December 2023).

E1.4 Eligible amount of own funds to cover the Minimum Capital Requirement, classified by tiers

The eligible own funds available to meet the MCR is €115,120k. The MCR ratio is calculated at 848% at 31st December 2024 (757% at 31st December 2023).

E1.5 Difference between equity as shown in the Financial Statements (FRS) and the Solvency II value excess of assets over liabilities

The following table shows the difference between equity as shown in the financial statements and the Solvency II balance sheet.

Own Funds (Solvency II)	2024 €'000	2023 €'000	Own Funds (FRS)	2024 €'000	2023 €'000
Paid up share capital	4,635	4,635	Paid up share capital	4,635	4,635
Other reserves	365	365	Other reserves	365	365
Profit and loss account	91,718	72,797	Profit and loss account	91,718	72,797
Reconciliation reserve	18,401	18,561	Reconciliation reserve		
Basic own funds	115,120	96,358	Basic own funds	96,718	77,797

The difference relates to the reconciliation reserve which represents the differences between the equity in the financial statements and the excess of the assets over liabilities as calculated for Solvency II purposes during the reporting period.

E.2 Solvency Capital Requirement and Minimum Capital Requirement

The Solvency Capital Requirement of DLL RE at 31st December 2024 is €54,310k. The Minimum Capital Requirement of the Company at 31st December 2024 is €13,578k. The Company applies the standard formula without any modifications and has not used any simplifications allowed by the regulations.

The Solvency Capital Requirement and the Minimum Capital Requirement of the Company is as follows:

Solvency Capital Requirement Sub Module	2024 €'000	2023 €'000	Movement
Non-life Risk	36,708	40,572	(3,864)
Health Risk	-	48	(48)
Market Risk	32,704	27,965	4,739
Default Risk	964	1,206	(243)
Operational Risk	1,740	1,495	246
LACDT	(2,832)	(5,898)	3,066
Diversification	(14,974)	(14,443)	(531)
Total SCR	54,310	50,945	3,365

Minimum Capital Requirement	2024 €'000	2023 €'000	Movement
Floor	13,578	12,736	841
Cap	24,440	22,925	1,514
MCR (linear)	7,279	6,605	674
MCR (combined)	13,578	12,736	841
Absolute floor	3,900	3,900	0
Minimum Capital Requirement	13,578	12,736	841

The Solvency Capital Requirement split by risk module is as follows:

Underwriting Risk

Non Life Underwriting Risk	2024 €'000	2023 €'000	Movement
NL Premium & Reserve Risk	22,204	27,973	-5,769
NL Lapse Risk	7,707	9,629	-1,922
NL Catastrophe Risk	23,187	21,640	1,548
Diversification Benefit	(16,390)	(18,669)	2,279
SCR	36,708	40,572	-3,864

Underwriting Risk is comprised of the following:

- There is a capital charge of €22,204k due to Non-Life Premium and Reserve Risk. These are standardised charges on DLL RE's Solvency II premium volume measurement (including future premium within the contract boundary) and Solvency II claims provisions at 31 December 2024.
- At the end of the reporting period there is a decrease of €5,769k in Premium and Reserve Risk. The decrease of €5,769k is due to the refinements to contract recognition dates and contract boundaries based on the 2024 accounts and the 2025 budget. The segments impacted are Other Motor Insurance, Fire and Other Damage Insurance and Miscellaneous Financial Loss.
- Lapse Risk arises from the effect of immediate cancellations for programs, the majority of these are contained in the Other Motor Insurance segment.
- The Non-Life CAT risk charge has increased by €1,548k and is driven by the Cresta Zone weightings for Nat CAT. The capital charge remains largely driven by the Other Motor Insurance and Fire and Other Damage to Property Insurance segments.
- The Man-Made CAT risk arises in Fire and Other Damage to Property Insurance segment.
- Premium and Reserve, CAT and Lapse Risk are not 100% correlated and the non-life underwriting risk charge benefits from a €16,390k diversification effect.

Health Risk

The Health Risk charge is zero (relates to Income Protection Insurance Personal Accident Cover) which is fully run-off.

Market Risk

Market Risk	2024 €'000	2023 €'000	Movement
Interest Rate	605	1,396	-792
Equity	0	0	0
Property	0	0	0
Spread	2,392	2,048	343
Currency	6,901	7,413	-512
Concentration	31,710	26,612	5,098
Diversification benefit	(8,903)	(9,504)	601
Market Risk SCR	32,704	27,965	4,739

Market Risk is comprised of the following:

- The interest rate risk relates to the risk of a change in the term structure/volatility of interest rates within the discounted best estimate liability valuation.
- Equity and property are not applicable to DLL RE.
- Spread risk stresses the duration of term deposits.
- The currency charge relates to the assets and liabilities of non-Euro exposures (USD is the main driver).
- The concentration risk stresses the counterparty default credit rating related to DLL RE's short term deposits. This is driven by DLL RE having a limited number of banking counterparties.

Default Risk

- The Counterparty Default charge of €964k (€1,206k at 31st December 2023) relates to DLL RE's credit exposure to immediately accessible cash held with Rabobank, the external bank and premiums due from cedants for expired risk. The movement is due to the change in investment mix i.e. holding less in the current account and more on short term deposits.

Operational Risk

- The Operational Risk charge is a formulaic calculation under Solvency II. The charge for DLL RE at the end of the reporting period is €1,740k.

Operational Risk	2024 €'000	2023 €'000	Movement
Op Premiums	1,018	942	76
Op Provisions	1,740	1,495	246
SCR Operational Risk	1,740	1,495	246

Loss Absorbing Capacity for Deferred Tax (LACDT)

- The Loss Absorbing Capacity for Deferred Tax is €2,832k (€5,898k at 31st December 2023). This has been capped at the Deferred Tax Liability on the Solvency II balance sheet. This is considered a prudent approach by DLL RE.

Diversification

- The diversification benefit across the risk modules is €14,974k (€14,443k at 31st December 2023).

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

Not applicable for the Company.

E.4 Difference between the Standard Formula and any Internal Model used

The Company applies the Standard formula model as defined by EIOPA and does not use an internal model to calculate the Solvency Capital Requirement.

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

The Company has maintained sufficient capital to meet its MCR and SCR throughout the period covered by this report.

E.6 Any Other Information

There is no other material information to report regarding the Company's capital management.

Annex 1 SFCR Disclosed QRTs

Template Code	Template Name
S.02.01.02	Balance sheet
S.04.05.21	Premiums, claims and expenses
S.05.01.02	Premiums, claims and expenses by country
S.17.01.02	Non-life technical provisions
S.19.01.21	Non-life insurance claims
S.23.01.01	Own funds
S.25.01.21	Solvency Capital Requirement - for undertakings on Standard Formula
S.28.01.01	Minimum Capital Requirement - only life or only non-life insurance or reinsurance activity

Annex I**S.02.01.02****Balance sheet****Assets**

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

	Solvency II value
	C0010
R0030	
R0040	
R0050	
R0060	
R0070	170,833
R0080	
R0090	
R0100	
R0110	
R0120	
R0130	
R0140	
R0150	
R0160	
R0170	
R0180	
R0190	
R0200	170,833
R0210	
R0220	
R0230	
R0240	
R0250	
R0260	
R0270	
R0280	
R0290	
R0300	
R0310	
R0320	
R0330	
R0340	
R0350	
R0360	
R0370	
R0380	
R0390	
R0400	
R0410	12,785
R0420	44
R0500	183,662

Annex I**S.02.01.02****Balance sheet****Liabilities**

Technical provisions – non-life

Technical provisions – non-life (excluding health)

Technical provisions calculated as a whole

Best Estimate

Risk margin

Technical provisions - health (similar to non-life)

Technical provisions calculated as a whole

Best Estimate

Risk margin

Technical provisions - life (excluding index-linked and unit-linked)

Technical provisions - health (similar to life)

Technical provisions calculated as a whole

Best Estimate

Risk margin

Technical provisions – life (excluding health and index-linked and unit-linked)

Technical provisions calculated as a whole

Best Estimate

Risk margin

Technical provisions – index-linked and unit-linked

Technical provisions calculated as a whole

Best Estimate

Risk margin

Contingent liabilities

Provisions other than technical provisions

Pension benefit obligations

Deposits from reinsurers

Deferred tax liabilities

Derivatives

Debts owed to credit institutions

Financial liabilities other than debts owed to credit institutions

Insurance & intermediaries payables

Reinsurance payables

Payables (trade, not insurance)

Subordinated liabilities

Subordinated liabilities not in Basic Own Funds

Subordinated liabilities in Basic Own Funds

Any other liabilities, not elsewhere shown

Total liabilities**Excess of assets over liabilities**

	Solvency II value
	C0010
R0510	64,269
R0520	64,269
R0530	
R0540	58,012
R0550	6,256
R0560	
R0570	
R0580	
R0590	
R0600	
R0610	
R0620	
R0630	
R0640	
R0650	
R0660	
R0670	
R0680	
R0690	
R0700	
R0710	
R0720	
R0740	
R0750	
R0760	
R0770	
R0780	2,832
R0790	
R0800	
R0810	
R0820	1,135
R0830	
R0840	
R0850	
R0860	
R0870	
R0880	307
R0900	68,542
R1000	115,120

Annex I
S.04.05.21
Premiums, claims and expenses by country

Home country: Non-life insurance and reinsurance obligations					
	Home Country	Top 5 countries: non-life			
		C0011	C0012	C0013	C0014
R0010		US	NL	GB	AU
	C0010	C0020	C0021	C0022	C0023
Premiums written (gross)	R0020				
Gross Written Premium (direct)					
Gross Written Premium (proportional reinsurance)	R0021	2,746	24,724	2,801	330
Gross Written Premium (non-proportional reinsurance)	R0022				77
Premiums earned (gross)					
Gross Earned Premium (direct)	R0030				
Gross Earned Premium (proportional reinsurance)	R0031	2,828	20,872	2,804	235
Gross Earned Premium (non-proportional reinsurance)	R0032				228
Claims incurred (gross)					
Claims incurred (direct)	R0040				
Claims incurred (proportional reinsurance)	R0041	319	8,772	-49	46
Claims incurred (non-proportional reinsurance)	R0042				-65
Expenses incurred (gross)					
Gross Expenses Incurred (direct)	R0050				
Gross Expenses Incurred (proportional reinsurance)	R0051	716	3,236	262	80
Gross Expenses Incurred (non-proportional reinsurance)	R0052				21

Annex I

S.05.01.02

Premiums, claims and expenses by line of business

Premiums written

Gross - Direct Business

Gross - Proportional reinsurance accepted

Gross - Non-proportional reinsurance accepted

Reinsurers' share

Net

Premiums earned

Gross - Direct Business

Gross - Proportional reinsurance accepted

Gross - Non-proportional reinsurance accepted

Reinsurers' share

Net

Claims incurred

Gross - Direct Business

Gross - Proportional reinsurance accepted

Gross - Non-proportional reinsurance accepted

Reinsurers' share

Net

Expenses incurred

Balance - other technical expenses/income

Total expenses

	Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)					Total
	Income protection insurance	Motor vehicle liability insurance	Other motor insurance	Fire and other damage to property insurance	Miscellaneous financial loss	
	C0020	C0040	C0050	C0070	C0120	
R0110						
R0120			25,320	4,460	898	30,678
R0130						
R0140						
R0200			25,320	4,460	898	30,678
R0210						
R0220			21,648	4,417	940	27,004
R0230						
R0240						
R0300			21,648	4,417	940	27,004
R0310						
R0320	-164	-1,485	8,285	1,788	-20	8,404
R0330						
R0340						
R0400	-164	-1,485	8,285	1,788	-20	8,404
R0550			3,728	371	224	4,322
R1200						
R1300						4,322

Annex I
S.17.01.02
Non-life Technical Provisions

Technical provisions calculated as a whole

Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole

Technical provisions calculated as a sum of BE and RM

Best estimate

Premium provisions

Gross

Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default

Net Best Estimate of Premium Provisions

Claims provisions

Gross

Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default

Net Best Estimate of Claims Provisions

Total Best estimate - gross

Total Best estimate - net

Risk margin

Technical provisions - total

Technical provisions - total

Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total

Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total

	Direct business and accepted proportional reinsurance				Total Non-Life obligation
	Motor vehicle liability insurance	Other motor insurance	Fire and other damage to property insurance	Miscellaneous financial loss	
	C0050	C0060	C0080	C0130	C0180
R0010					
R0050					
R0060		49,745	-3,983	2,044	47,805
R0140					
R0150		49,745	-3,983	2,044	47,805
R0160	3,984	5,793	151	278	10,207
R0240					
R0250	3,984	5,793	151	278	10,207
R0260	3,984	55,538	-3,832	2,322	58,012
R0270	3,984	55,538	-3,832	2,322	58,012
R0280	510	4,896	538	312	6,256
R0320	4,495	60,434	-3,294	2,634	64,269
R0330					
R0340	4,495	60,434	-3,294	2,634	64,269

Annex I
S.19.01.21
Non-life Insurance Claims Information

Total Non-Life Business

Accident year /
Underwriting year

Z0020	Accident year [AY]
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Gross Claims Paid (non-cumulative)
(absolute amount)

Year	Development year											In Current year	Sum of years (cumulative)
	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0170	C0180
Prior	R0100										36	R0100	36
2015	R0160	2,928	1,751	284	763	589	493	391	242	156	8	R0160	8
2016	R0170	4,218	1,799	200	206	443	47	69	65	301		R0170	301
2017	R0180	5,296	2,865	37	99	-18	27	20	0			R0180	0
2018	R0190	6,061	2,773	86	8	-666	19	8				R0190	8
2019	R0200	6,135	2,331	-126	383	-14	68					R0200	68
2020	R0210	7,708	2,804	392	-17	37						R0210	37
2021	R0220	5,357	1,341	300	154							R0220	154
2022	R0230	6,992	90	726								R0230	726
2023	R0240	6,079	1,062									R0240	1,062
2024	R0250	6,372										R0250	6,372
Total												R0260	8,774

Gross undiscounted Best Estimate Claims Provisions
(absolute amount)

Year	Development year											Year end (discounted data)	
	C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300		
Prior	R0100										913	R0100	876
2015	R0160		5,426	6,709	4,986	4,092	3,426	2,356	1,892	3,107	2,468	R0160	2,347
2016	R0170	11,991	6,072	3,853	2,987	1,945	1,257	1,798	1,838	821		R0170	766
2017	R0180	4,977	392	131	209	10	2	2	16			R0180	16
2018	R0190	7,083	284	185	121	74	44	17				R0190	16
2019	R0200	4,429	567	129	50	26	10					R0200	10
2020	R0210	6,132	297	66	97	111						R0210	108
2021	R0220	4,183	358	177	63							R0220	62
2022	R0230	4,376	700	376								R0230	365
2023	R0240	4,859	904									R0240	876
2024	R0250	4,920										R0250	4,766
Total												R0260	10,207

Annex I
S.23.01.01
Own funds

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

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

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

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

Deductions

Deductions for participations in financial and credit institutions

Total basic own funds after deductions

Ancillary own funds

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

Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC
Other ancillary own funds

	Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
	C0010	C0020	C0030	C0040	C0050
R0010	4,635	4,635			
R0030					
R0040					
R0050					
R0070					
R0090					
R0110					
R0130	110,485	110,485			
R0140					
R0160					
R0180					
R0220					
R0230					
R0290	115,120	115,120			
R0300					
R0310					
R0320					
R0330					
R0340					
R0350					
R0360					
R0370					
R0390					

Annex I
S.23.01.01
Own funds

Total ancillary own funds

Available and eligible own funds

Total available own funds to meet the SCR

Total available own funds to meet the MCR

Total eligible own funds to meet the SCR

Total eligible own funds to meet the MCR

SCR

MCR

Ratio of Eligible own funds to SCR

Ratio of Eligible own funds to MCR

	Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
	C0010	C0020	C0030	C0040	C0050
R0400					
R0500	115,120	115,120			
R0510	115,120	115,120			
R0540	115,120	115,120			
R0550	115,120	115,120			
R0580	54,310				
R0600	13,578				
R0620	211.97%				
R0640	847.87%				

Reconciliation reserve

Excess of assets over liabilities

Own shares (held directly and indirectly)

Foreseeable dividends, distributions and charges

Other basic own fund items

Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds

Reconciliation reserve

Expected profits

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

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

Total Expected profits included in future premiums (EPIFP)

	C0060
R0700	115,120
R0710	
R0720	
R0730	4,635
R0740	
R0760	110,485
R0770	
R0780	5,254
R0790	5,254

Annex I

S.25.01.21

Solvency Capital Requirement - for undertakings on Standard Formula

Market risk

Counterparty default risk

Life underwriting risk

Health underwriting risk

Non-life underwriting risk

Diversification

Intangible asset risk

Basic Solvency Capital Requirement

Calculation of Solvency Capital Requirement

Operational risk

Loss-absorbing capacity of technical provisions

Loss-absorbing capacity of deferred taxes

Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC

Solvency capital requirement excluding capital add-on

Capital add-on already set

of which, capital add-ons already set - Article 37 (1) Type a

of which, capital add-ons already set - Article 37 (1) Type b

of which, capital add-ons already set - Article 37 (1) Type c

of which, capital add-ons already set - Article 37 (1) Type d

Solvency capital requirement

Other information on SCR

Capital requirement for duration-based equity risk sub-module

Total amount of Notional Solvency Capital Requirement for remaining part

Total amount of Notional Solvency Capital Requirements for ring fenced funds

Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios

Diversification effects due to RFF nSCR aggregation for article 304

Approach to tax rate

Approach based on average tax rate

Calculation of loss absorbing capacity of deferred taxes

LAC DT

LAC DT justified by reversion of deferred tax liabilities

LAC DT justified by reference to probable future taxable economic profit

LAC DT justified by carry back, current year

LAC DT justified by carry back, future years

Maximum LAC DT

	Gross solvency capital requirement	USP	Simplifications
	C0110	C0090	C0120
R0010	32,704		
R0020	964		
R0030			
R0040			
R0050	36,708		
R0060	-14,974		
R0070			
R0100	55,402		

	C0100
R0130	1,740
R0140	
R0150	-2,832
R0160	
R0200	54,310
R0210	
R0211	
R0212	
R0213	
R0214	
R0220	54,310
R0400	
R0410	
R0420	
R0430	
R0440	

	Yes/No
	C0109
R0590	1 - Yes

	LAC DT
	C0130
R0640	-2,832
R0650	-2,832
R0660	
R0670	
R0680	
R0690	-7,143

Annex I
S.28.01.01
Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity
Linear formula component for non-life insurance and reinsurance obligations

	MCR components	
	R0010	C0010
MCR _{NL} Result		7,279
	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	
Income protection insurance and proportional reinsurance	R0030	
Workers' compensation insurance and proportional reinsurance	R0040	
Motor vehicle liability insurance and proportional reinsurance	R0050	3,984
Other motor insurance and proportional reinsurance	R0060	55,538
Marine, aviation and transport insurance and proportional reinsurance	R0070	
Fire and other damage to property insurance and proportional reinsurance	R0080	4,460
General liability insurance and proportional reinsurance	R0090	
Credit and suretyship insurance and proportional reinsurance	R0100	
Legal expenses insurance and proportional reinsurance	R0110	
Assistance and proportional reinsurance	R0120	
Miscellaneous financial loss insurance and proportional reinsurance	R0130	2,322
Non-proportional health reinsurance	R0140	
Non-proportional casualty reinsurance	R0150	
Non-proportional marine, aviation and transport reinsurance	R0160	
Non-proportional property reinsurance	R0170	

Linear formula component for life insurance and reinsurance obligations

	C0040
MCR _L Result	R0200

Total capital at risk for all life (re)insurance obligations

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

Overall MCR calculation

Linear MCR
SCR
MCR cap
MCR floor
Combined MCR
Absolute floor of the MCR
Minimum Capital Requirement

	C0070
R0300	7,279
R0310	54,310
R0320	24,440
R0330	13,578
R0340	13,578
R0350	3,900
R0400	13,578