



**RiverStone**  
International

# RiverStone International Ireland dac

## Solvency and Financial Condition Report

**31 DECEMBER 2024**

Unit 44, Block 5  
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## EXECUTIVE SUMMARY

**RiverStone International Ireland dac** (the “**Company**” or “**RIIDAC**”) is an insurance undertaking authorised by the Central Bank of Ireland (“**CBI**”), pursuant to the European Union (Insurance and Reinsurance) Regulations 2015, to carry on non-life insurance business in classes 1 to 18 as defined in European Union (Insurance and Reinsurance) Regulations 2015 (SI No. 485 of 2015), with the right to carry on business in such classes in other European Union (“**EU**”) jurisdictions on a freedom of services basis.

On 2 February 2024, the Company was acquired by RiverStone International Limited (“**RiverStone International**”), following no objection from the **CBI**, and subsequently changed its name from Catalina Insurance Ireland dac to RiverStone International Ireland dac, effective from 13 February 2024. As part of the transaction, immediately prior to completion, the Company commuted the intra-group reinsurance arrangement with Catalina General Insurance Ltd. and received a capital injection of €73.7 million. This has been categorised as Tier 1 capital.

The Company intends to acquire and manage run-off portfolios in the future. The Company is in the process of acquiring two portfolios, the first being a portfolio of Spanish medical malpractice business, in run-off since 2019 and the second a portfolio of French motor and architects and engineers’ professional indemnity, in run-off since 2019. Both transactions are subject to regulatory approval and expected to complete in the second half of 2025.

### Business and performance – Section A

The Company made a profit after tax for the year of €17.2 million, compared to a loss after tax of €9.2 million in 2023. The underwriting result for the year was a profit of €10.2 million which is mainly due to favourable development on the run-off of the claims on the Company’s German medical malpractice (“**MedMal**”) portfolio emerging during the year. The investment return for the year was a profit of €12.2 million (2023: €2.5 million) largely due to the increase in the investment portfolio and the mix of assets in the portfolio.

### System of governance – Section B

The board of directors (the “**Board**”) has ultimate responsibility for all aspects of the business and sets the corporate objectives and strategy to achieve those objectives. The Board has delegated the day to day running of the Company to the CEO. The CEO reports on these activities at each quarterly board meeting. In addition, the Board has established the four key control functions required under Solvency II and the Corporate Governance Requirements for Insurance Undertakings 2015 (the “**CGR**”); risk management, actuarial, compliance and internal audit. There have been no material changes to the system of governance during the year.

### Risk profile – Section C

The current material risks for the Company are:

- Underwriting risk: The risk of loss arising from unexpected high frequency or severity of insurance claims.
- Market risk: The risk of adverse financial impact as a consequence of market movements such as currency exchange rates, interest rates and other price changes.
- Credit risk: The risk that a counterparty will default on its contractual obligations resulting in financial loss to the Company.
- Liquidity risk: The risk that the Company cannot meet its obligations associated with financial liabilities as they fall due.
- Operational risk: The risk of the Company being exposed to losses occurring as a result of failures within its internal systems and processes.

All these risks, with the exception of liquidity, are measured using the standard formula model and are managed in line with the Board approved risk appetite. Liquidity risk is separately modelled and stressed over varying time horizons.

As part of the acquisition by RiverStone International, the Company commuted the intra-group reinsurance arrangement with Catalina General Insurance Ltd. and received a capital injection of €73.7 million. This has reduced the credit risk and increased market risk and net underwriting risk within the company.

### Valuation for solvency purposes – Section D

The Solvency II net assets (Own Funds) at 31 December 2024 were €134 million, compared with Irish Generally Accepted Accounting Principles (“GAAP”) net assets of €126 million. There was no change in the approach by the Company during the year to valuing assets and liabilities according to Solvency II and GAAP valuation principles.

### Capital management – Section E

The Solvency Capital Ratio (“SCR”) ratio for the Company at 31 December 2024 was 208% (2023: 131%). Total Own Funds in 2024 were €134 million, all of which were eligible to meet the SCR of €64 million. In comparison, in 2023 Own funds were €49 million, of which €40 million were eligible to meet the SCR of €30 million.

#### Own funds

Own Funds increased from €49 million to €134 million during the year. The increase was resulting from an increase in Tier 1 capital from a capital injection of €73.7 million and a reduction in cumulative solvency II economic losses by €11 million.

Under Solvency II the Own Funds are classified in 3 tiers, with Tier 1 being the highest quality. At 31 December 2024, an amount of €110 million was classified as Tier 1 Own Funds and €24 million was classified as Tier 2 Own Funds. There were no Tier 3 Own Funds held at 31 December 2024. The eligible amounts of Tier 2 and Tier 3 items combined is limited to 50% of the SCR.

#### Solvency Capital Requirement

The SCR value at 31 December 2024 was €64 million (2023: €30 million). There were no instances of non-compliance of SCR coverage during the year.

#### Minimum Capital Requirement

The Minimum Capital Requirement (“MCR”) is the minimum level of capital which an insurance company should not fall below. The MCR value at 31 December 2024 was €16 million (2023: €7.5 million) and the MCR ratio at 31 December 2024 was 702% (2023: 345%). There were no instances of non-compliance of MCR coverage during the year.

## INFORMATION ON THE SOLVENCY AND FINANCIAL CONDITION REPORT

### Requirements of the Solvency and Financial Condition Report (“SFCR”)

Solvency II became effective on 1 January 2016 for all insurance companies and groups regulated in the EU. The aim of Solvency II is to provide a risk-based approach to calculating and monitoring the required levels of capital for insurance companies. It also introduced a requirement for insurance companies to produce a publicly available SFCR to assist consumers and other stakeholders in understanding the types of business written, how the business is managed and the overall financial condition of the Company, including regulatory capital coverage.

For insurance companies regulated by the CBI, the SFCR is produced in accordance with Article 52 of statutory instrument 485 of 2015, Article 290 to 303 of Commission Delegated Regulation (EU) 2015/35 and the EIOPA guidelines on reporting and public disclosures (B05-15-109). Included in the appendix to the SFCR are those Quantitative Reporting Templates (“QRTs”) for the year ended 31 December 2024, as required to be included according to Article 5 of Commission Implementing Regulation (EU) 2015/2452.

### Note on auditability

The following QRTs were audited by the Company’s independent auditors, Deloitte Ireland LLP (“Deloitte”):

- Balance Sheet (S02.01.02)
- Life and Health SLT Technical Provisions (S12.01.02)
- Non-life Technical provisions (S17.01.02)
- Non-life Insurance Claims Information (S19.01.21)
- Own Funds (S23.01.01)
- Solvency Capital Requirement (S25.01.21)
- Minimum Capital Requirement (S28.01.01)

In accordance with CBI regulation, narrative sections of this report, section D and E, were reviewed by Deloitte for consistency with the related QRTs.

### Note on materiality

Information disclosed is considered material if its omission or misstatement could influence the decision-making or judgment of the users of the document, including the CBI.

### Approval of the Solvency and Financial Condition Report

The SFCR was reviewed and approved by the Board on 1 April 2025

## A. BUSINESS AND PERFORMANCE

### A.1 BUSINESS

#### A.1.1 Undertaking, financial supervisory authority and external auditor

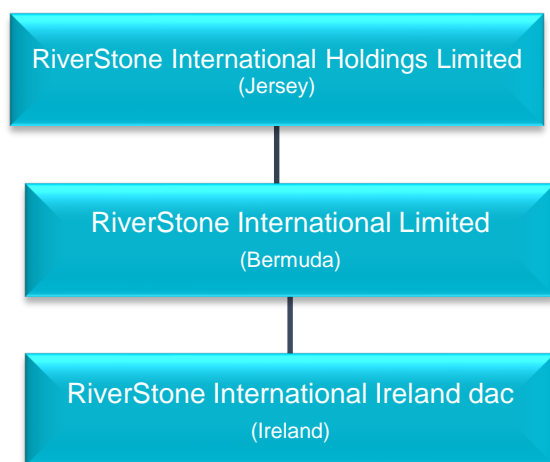
<b>Name of the undertaking:</b>	RiverStone International Ireland dac
<b>Address of its registered office:</b>	Unit 44 Block 5 Northwood Court Northwood Crescent Northwood Santry Dublin 9, Ireland D09 EW63
<b>Legal status:</b>	Designated Activity Company
<b>Company registration number:</b>	225221
<b>Legal Entity Identifier (LEI):</b>	6354002SNIV14GB1BI20
<b>Ultimate parent:</b>	RiverStone International Holdings Limited
<b>Financial supervisory authority:</b>	Central Bank of Ireland New Wapping Street North Wall Quay Dublin 1, Ireland
<b>External auditor:</b>	Deloitte Ireland LLP Chartered Accountants and Statutory Audit Firm Deloitte & Touche House 29 Earlsfort Terrace Dublin 2, Ireland D02 AY28

The Company's' immediate shareholder is RiverStone International Limited, a company registered in Bermuda, at the Clarence House, 2 Church Street, Hamilton, HM11, Bermuda.

The ultimate holding company is RiverStone International Holdings Limited a private limited company incorporated in Jersey at the registered address at 27 Esplanade, St Helier, Jersey, JE1 1SG. The majority of the shares in RiverStone International are held by the controlling party, CVC Capital Partners Strategic Opportunities II LP.

Below is a simplified structure chart showing the 100% owned subsidiary of the company and the simplified ownership chain upwards to RiverStone International Holdings Limited. Please note between RiverStone International Limited and RiverStone International Holdings Limited, there are other intermediate holding companies not included in the simplified group structure.

**From 2 February 2024**



**A.1.2 Material lines of business and geographical areas where the Company carries out business**

The Company's portfolios are in run-off and it is no longer underwriting insurance products. The Company was originally purchased from the HSBC Group in 2012 by Catalina Holdings (Bermuda) Ltd. ("Catalina"). At the beginning of February 2024, the Company was purchased from Catalina by RiverStone International.

The Company provided general insurance products through independent intermediaries in the UK and other markets and products to HSBC customers in UK. The Company underwrote direct business for retail home and motor products, some school fee protection business and the non-life element of a creditor product in the Italian market. Motor and Property business were written in the UK and Northern Ireland from 2001 to 2004, and also from 2007 to 2009. During the latter period the Company wrote business in the Republic of Ireland. The Italian Creditor class of business was written from 2003 to 2009.

In 2015, the Company acquired a portfolio of insurance liabilities from Quinn Insurance Limited (Under Administration). The portfolio comprises business in the UK, Northern Ireland and Europe (Germany, Belgium and the Netherlands). The business is predominantly UK and Northern Ireland motor insurance and professional indemnity (UK solicitors), with some employer's liability and public liability business. All classes of business transferred are in run-off.

During 2018, the Company acquired a portfolio of insurance liabilities from Zurich Insurance Plc. The business consists of a portfolio of insurance policies which provide cover for various types of losses arising in connection with the business and healthcare operations of hospitals, clinics and other healthcare providers in Germany including as a result of medical malpractice. The business was written through specialist German brokers to German hospitals between 1946 and 2012.

### **A.1.3 Significant events**

As previously mentioned, the Company was acquired by RiverStone International during the year and as part of the transaction, immediately prior to completion, the Company commuted a material intra-group reinsurance arrangement and received a capital injection of €73.7 million from the former owner.

The Company intends to acquire and manage run-off portfolios in the future. The Company is in the process of acquiring two portfolios, the first being a portfolio of Spanish medical malpractice business, in run-off since 2019 and the second a portfolio of French motor and architects and engineers' professional indemnity, in run-off since 2019. Both transactions are subject to regulatory approval and expected to complete in the second half of 2025.



## A.2 UNDERWRITING PERFORMANCE

The table below shows the underwriting performance for the year end 31 December 2024, together with comparatives for the previous year.

	2024	2023
	€000	€000
Gross written premium	-	-
Earned premiums, net of reinsurance	-	-
Allocated investment return	2,058	1,608
Other technical income	-	(36)
Claims incurred, net of reinsurance	13,149	(5,353)
Net operating expenses	(4,981)	(3,784)
<b>Balance on the technical account</b>	<b>10,226</b>	<b>(7,565)</b>
<b>By class of business:</b>		
Motor	(5,549)	(1)
Liability	15,775	(7,564)
Property	-	-
<b>Balance on the technical account</b>	<b>10,226</b>	<b>(7,565)</b>
<b>By geographical area:</b>		
United Kingdom	(6,766)	125
Ireland	-	-
Germany	16,834	(7,681)
Other	158	(9)
<b>Balance on the technical account</b>	<b>10,226</b>	<b>(7,565)</b>

The underwriting profit for the year was mainly due to favourable development on the run-off of the claims on the Company's MedMal portfolio emerging during the year, particularly in respect of the valuation of annuities

### A.3 INVESTMENT PERFORMANCE

The table below shows the investment income performance for the year end 31 December 2024, together with comparatives for the previous year.

	Net investment income	Net investment expense	Net realised gains and losses	Changes in fair value	Net investment result
	2024	2024	2024	2024	2024
	€000	€000	€000	€000	€000
Financial assets:					
- measured at FVTPL	12,616	(209)	(860)	(503)	11,044
- measured at amortised cost	-	-	-	-	-
- measured at cost	814	-	-	-	814
- forward currency contracts	-	-	-	303	303
	<b>13,430</b>	<b>(209)</b>	<b>(860)</b>	<b>(200)</b>	<b>12,161</b>

	Net investment income	Net investment expense	Net realised gains and losses	Changes in fair value	Net investment result
	2023	2023	2023	2023	2023
	€000	€000	€000	€000	€000
Financial assets:					
- measured at FVTPL	2,028	(123)	(845)	(6)	1,054
- measured at amortised cost	135	-	-	-	135
- measured at cost	526	-	-	-	526
- forward currency contracts	-	-	(300)	1,134	834
	<b>2,689</b>	<b>(123)</b>	<b>(1,145)</b>	<b>1,128</b>	<b>2,549</b>

The investment performance was much stronger in 2024, than in 2023, in principle due to the level of investments held €347 million (2023: €101 million) and the mix of investments held. The net investment result was €12.2 million, compared to €2.5 million in 2023.

## A.4 PERFORMANCE OF OTHER AREAS

The table below details any other material operating income and expenses not shown in A2 and A3 above.

	2024	2023
	€000	€000
Foreign exchange gains/(losses)	(186)	(2)
Interest expenses (Subordinate loans)	(2,959)	(2,610)
	(3,145)	(2,612)

In December 2016 the Company issued €23.8 million of floating rate subordinated loan notes. The notes are due in January 2027 and they are listed on the Channel Island Stock Exchange. Interest on the notes is based on EURIBOR plus a margin of 7.2%. The margin increased to 7.95% with effect from 23 December 2019. Interest expense in connection with these notes are noted above.

The company had a fair value reserve movement of €1.3 million (2023: €1.8 million) through equity, this was in respect of movements in fair values of financial assets.

## A.5 ANY OTHER INFORMATION

Not applicable.

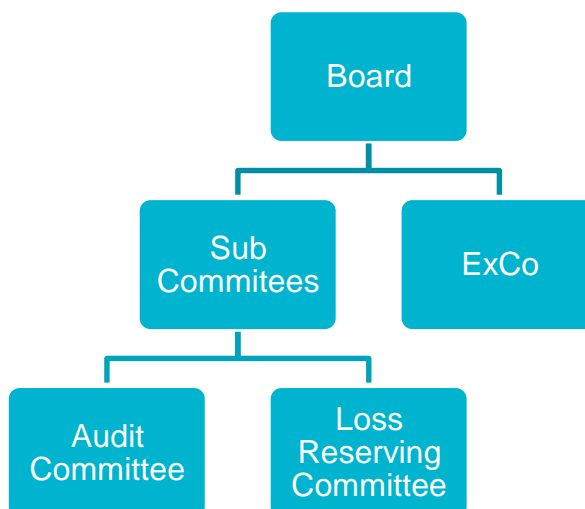
## B. SYSTEM OF GOVERNANCE

### B.1 OVERVIEW OF THE SYSTEM OF GOVERNANCE

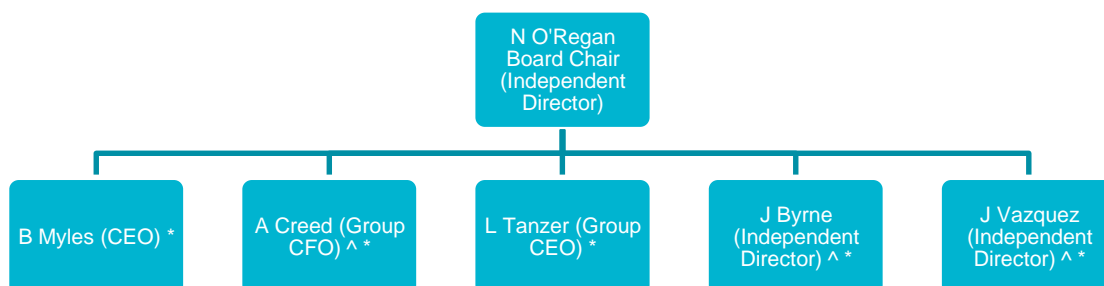
The Board of Directors has mandated a basis for effective risk management within the Company prescribed by a clear system of governance that covers all significant aspects of the business, provides an open forum for challenge, and allocates clear and transparent lines of responsibilities for both collective management committees and individuals. In addition, the Board has established the four key control functions of risk management, actuarial, compliance and internal audit as required under Solvency II and the CBI's **CGR**. These key control 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 internal control framework. The Board has delegated the day to day running of the Company to the Chief Executive Officer ("**CEO**") who is assisted by the Executive Management team by way of an established Executive Committee ("**ExCo**") in the discharge of those duties.

The Chair of the board is an Independent Non-Executive Director ("**INED**"). In line with the **CGR**, the Board has established the following sub-committees:

#### Board and Sub-Committee Structure



## Board and Sub-Committee Membership



^ Member of the Audit Committee

\*Member of the Loss Reserving Committee together with additional members from the Company and the wider RiverStone Group.

### Board Risk Committee

Section 23 of the CGR permits the Board to carry out the functions which would otherwise be delegated to a Risk Committee once the CBI's prior written approval has been obtained. This approval was previously obtained by the Company. The Board, acting as the Risk Committee, ("**BRC**") has the responsibility of analysing and taking ownership of the fundamental risk management principles employed by the Company. Following the change in ownership in February 2024, the Board continued to act as the BRC.

### Audit Committee

The principal purpose of the Audit Committee is to assist the Board in discharging its responsibilities for monitoring the integrity of the Company's financial statements, directors' report and statement of directors' responsibilities. In addition, it reviews the adequacy and effectiveness of the Company's systems of internal control and monitors the effectiveness, performance and objectivity of the internal and external auditors. The Audit Committee meets at least two times per year and is chaired by an INED.

### Loss Reserving Committee

The Loss Reserving Committee ("**LRC**") reports to the Board and the Audit Committee. The LRC is in place to review and challenge the output from both internal and external actuarial reviews. It is responsible for reviewing the adequacy of, and approving, the reserves of the Company. The LRC meets two times per year and is chaired by the CEO.

### Executive Committee

The principle responsibility of the ExCo is to assist the CEO in the execution of the Company's strategy and for managing the business in accordance with the agreed strategy. The ExCo comprises the CEO (Chair), Head of Claims, Head of Finance, Head of Compliance, Head of Actuarial Function ("**HoAF**"), Chief Risk Officer ("**CRO**") and Head of Investment.

### Independent Control Functions

The Company has four independent control functions:

- A Risk Management Function, managed by the CRO, that is responsible for the development and on-going maintenance of an effective risk Management System. The CRO has a direct reporting line to the Board.
- A Compliance Function, managed by the Head of Compliance, that is responsible for effectively managing the operation of the Compliance Framework. The Head of Compliance reports to the Board on compliance matters.

- An Actuarial Function, managed by the HoAF who is responsible for the calculation of technical provisions and the provision of opinions on technical provisions, underwriting, reinsurance and the ORSA. The HoAF reports to the Board and Audit Committee.
- Internal Audit Function, managed by the Head of Internal Audit, provides independent and objective assurance to the Audit Committee and the Board on the adequacy and effectiveness of the System of Governance. The Head of Internal Audit role is outsourced to an individual in Group who reports to the Board and Audit Committee

The Board reviews the System of Governance annually and is satisfied that the structures in place are appropriate for the nature, scale, and complexity of the Company's business.

### Remuneration, Employee Benefits and Practice

The Company has applied the principle of proportionality to requirements regarding the establishment of a remuneration committee. The Company does not have a remuneration committee, but it does have a policy on remuneration. The Company strives to attract and retain high quality employees for key roles, by offering a competitive benefits packages and an attractive and challenging work environment. The objectives of the Company's remuneration policy are to ensure that;

- remuneration policies and practices are aligned with the Company's overall strategy, risk management strategy and risk appetite, objectives, values and long-term interests of the Company;
- the policy applies to the undertaking as a whole in a proportionate and risk focused way, taking into account the respective roles of the Company's employees;
- the policy does not foster practices adverse to policyholders' interests;
- the Company can attract and retain highly qualified employees with skills required to effectively manage the Company;
- employees are compensated appropriately for the services they provide to the Company; and
- employees are motivated to perform in the best interests of the Company and its stakeholders.

The Company's remuneration packages include both fixed and variable components. The Company considers that the components are appropriately balanced to ensure that the fixed component represents a larger proportion of the total remuneration. The variable component is based on an annual performance assessment of each individual, combined with the overall performance of the Company and that of the Group to which the Company belongs.

The Company offers all employees the choice of making contributions into a defined contribution pension scheme, which the Company also contributes too. Once the contribution has been paid, the Company has no further obligations. The defined contribution scheme is independently managed by a third party.

### Material Transactions with Group

During the period, the Company entered into a material outsourcing arrangement with another RiverStone Group entity. Further detail is included in the Outsourcing section in B7.

## B.2 FIT AND PROPER REQUIREMENTS

The Company must ensure that key roles performed within its operations are identified and filled by employees who are demonstrably qualified for the role. The CEO is responsible for ensuring that activities are undertaken and managed by professionals with the appropriate experience, skill levels, and degrees of specialisation.

### Solvency II requirements

Solvency II requires that "*all persons who effectively run the undertaking or have other key functions are Fit and Proper at all times*". 'Fit and proper' persons must have the appropriate professional qualifications, knowledge and experience to enable them to perform their duties and fulfil their obligations, as well as being of good repute and integrity. Key functions are defined as all functions considered important and/or critical in the system of governance, including at least the Risk Management Function, Compliance Function, Internal Audit Function and Actuarial Function. The requirement for Fit and Proper extends to the Board, which collectively should contain the

qualifications, knowledge, skills and experience to be able to provide for the sound and prudent management of the business.

### **Regulatory Requirements**

Part 3 of the Central Bank Reform Act 2010 (“**the Act**”) provides that those persons performing pre-approved controlled functions (“**PCFs**”) and controlled functions (“**CFs**”) in a regulated financial service provider must have a level of fitness and probity appropriate to the performance of that particular function. In general, the Fitness and Probity Standards require that persons must (i) be competent and capable, (ii) act honestly, ethically and with integrity, and (iii) be financially sound.

The Company is required to notify the CBI of any changes to the identity of the persons who effectively run the Company or are responsible for other key control functions (i.e. PCF role holders), along with all information needed to assess whether any new persons appointed to manage the Company are fit and proper. In addition, the CBI must be notified in the event a person is replaced because they no longer fulfil the fitness and probity requirements. A PCF or CF remains a function of the Company even if outsourced to a third party.

### **Due Diligence Requirements for Controlled Functions**

Any person who is proposed to be appointed to a PCF or a CF role, are required to undergo a range of fitness and probity checks to enable the Company to make an informed decision about the suitability of an individual for employment. These typically include the following verifications/checks:

- Record of employment history
- References from former employers
- Verification of qualifications
- Authorisation to work in the jurisdiction
- Details of concurrent responsibilities – other directorships/employments etc.
- Financial soundness checks
- Disqualification, disciplinary, and administrative sanction checks

In addition, for members of senior management performing PCF and CF roles, external directorship/conflict of interest checks are performed. These checks are conducted independently to any checks performed by the CBI under its fit and proper review for “approved persons”.

### **Ongoing due diligence**

The Company has a continuing obligation to complete an annual certification process for all PCF and CF role holders to confirm they are compliant with the Fitness and Probity Standards and continue to agree to abide by those Standards. In addition, the Company has a programme incorporating, training, periodic screening, and a refresh of due diligence files to uphold the fitness and probity standards.

### **Individual Accountability Framework (“IAF”)**

During the period the Company has implemented an IAF framework, including a Board approved IAF policy, to ensure transparency and accountability of specific individuals in PCF roles. The IAF Policy is in addition to the Company’s existing Fitness and probity Policy. It sets out the requirements, obligations and standards to be met, the processes and procedures to be adhered to including conduct standards, enhanced fitness and probity regime (including fitness and probity certification process), performance management and disciplinary and escalation processes in case of any breaches.

## **B.3 RISK MANAGEMENT SYSTEM INCLUDING THE OWN RISK AND SOLVENCY ASSESSMENT**

The Risk Management Strategy is derived from the Company’s strategic and business objectives. This constitutes the basis for which the Company’s Risk Management Framework is developed. The Risk Management Strategy expresses the Company’s attitude towards the recognition and handling of risk.

The Risk Management Strategy seeks to:

- Ensure that the Risk Management Framework is fully implemented and reflects the nature, scale and complexity of the risks inherent in the business.
- Promptly identify, measure, manage, monitor and report on risks impacting the achievement of strategic, operational and financial objectives.
- Promote a sound risk management culture through disciplined and informed risk taking.

### **Risk Management Framework (“RMF”)**

Risks are managed on a day-to-day basis in accordance with the RMF, where risks are identified, measured, managed, monitored and reported on as part of the risk management cycle. The BRC receives regular reports from the CRO on the outcome of quarterly risk and control assessments undertaken by management as part of this cycle of risk monitoring activities.

The RMF is intended to reduce but not eliminate the potential risks or issues that may impact the Company. Similarly, it cannot protect, with certainty, against the failure of the Company to meet its business objectives or guard against any material errors, losses, fraud or breaches of laws / regulations. Taking this into account, the RMF is intended to provide reasonable assurance that the Company will on an ongoing basis, be able to conduct its business in an orderly manner.

### **Risk appetite**

The Company’s Board approved Risk Appetite Statement reflects the types and level of risk the Company is prepared to accept in the pursuit of its strategic and business objectives. Risk appetite enables the Company to make informed business decisions, whilst having regard to the key risks that the Company is or may be exposed to. Risks are managed within the risk limits and tolerances set in the Risk Appetite Statement and associated key risk indicator reporting.

### **Risk Policies**

The Board has approved risk policies for the following areas;

- Technical provisions risk
- Insurance risk
- Investment risk
- Credit risk
- Asset-liability risk
- Liquidity risk
- Operational risk
- Capital management risk
- Reinsurance risk
- Own Risk and Solvency Assessment

### **Risk Management Function**

The Risk Management Function is an independent control function which sits in the Second Line of Defence.

Its main responsibilities include:

- Developing and embedding the Risk Management Framework.
- Monitoring and reporting on risk exposure.
- Promoting a sound risk management culture.

These responsibilities are discharged through:

- Reviewing and challenging the adequacy and completeness of risk assessments and the implementation of controls.
- The preparation and execution of a risk-based monitoring plan.
- Reporting to the BRC / Board on key risks and compliance with risk appetites.
- Advising the BRC / Board on decision making in respect of any material changes to the risk profile and setting the risk appetite statement.



For most of the year, the Risk Management Function, including the role of CRO continued to be provided to the Company via outsourcing arrangements. From 2 February 2024, following the change in the Company's ownership, the Risk Management Function, including the role of CRO, was outsourced for a limited period and until such time as the Company recruited a local resource for the CRO role. In late 2024, the role of CRO has been managed by a dedicated full time internal employee.

### Three Lines of Defence

The Company has adopted a "three lines of defence" approach to managing risk across the Company, enabling the second line Risk Management Function to review and independently challenge the business and report its findings to the Board and Sub-Committees.

### Own Risk and Solvency Assessment

The Own Risk and Solvency Assessment ("ORSA") process documents the output of the Company's Enterprise Risk Management process. The aim of the ORSA report is principally to inform the Board and the ExCo with an aggregated view of the economic risk and capital requirements during the period and allow a strategic, forward-looking discussion of both future and emerging risks and capital needs.

The Board and ExCo's involvement are integrated into the ORSA and they are engaged to challenge, discuss and debate the process. The ORSA process allows management and the Board to review the risk and capital requirements and take a strategic, forward-looking view of future risks and capital needs.

The ORSA process incorporated the following key activities;

- To identify, measure, monitor, manage and report on the short and long term risks the Company faces and to determine its solvency needs.
- To form an integral part of the strategy setting and business planning process by undertaking scenario analysis to assess the capital adequacy of the Company's business plan taking into account the nature and complexity of the inherent risks and considering the impacts from the external environment.
- To assist in setting the amount of risk the Company is willing to accept.
- To contribute to the decision-making processes by identifying the capital implications of specific forward-looking strategic initiatives.

The ORSA is produced annually by Management in conjunction with the Actuarial and Risk Management functions. The ORSA is presented to the Board for challenge, comment, review and approval.

## B.4 INTERNAL CONTROL SYSTEM

An effective system of internal control is a critical component of the Company's system of governance. The internal control system comprises a coherent, comprehensive and continuous set of processes that are performed on an ongoing basis to support the achievement of the following objectives:

- the effectiveness and efficiency of the Company's operations;
- the availability and reliability of financial and non-financial information;
- adequate control of risks
- a prudent approach to business; and
- compliance with laws, regulations, internal policies and procedures.

The internal control system consists of five inter-related components:

- **Control environment:** This is the foundation of the internal control system and sets the tone for all other components. Factors include integrity and ethical value, management philosophy, and operating style, assignment of authority and responsibility, competency of the workforce, organisation structure and attention and direction by the Board.
- **Risk assessment:** The identification and assessment of controls follows a regular cycle of review to ensure controls remain effective in mitigating risks.

- **Control activities:** actions undertaken to design and execute controls to mitigate against risk including the assessment of controls to ensure they remain effective.
- **Information and communication:** clear roles and responsibilities in relation to the design and execution of controls, the sharing of information on the performance of controls to support decision making and lessons learned on control weaknesses.
- **Monitoring:** active monitoring to ensure controls continue to operate effectively.

### Compliance Function

The Compliance Function, overseen by the Head of Compliance, is part of the Company's overall corporate governance structure and sits within the Company's second line of defence. The function is responsible for identifying, assessing, monitoring, managing, and the reporting of Compliance risks to which the Company is exposed. Regular compliance monitoring reviews take place to ensure the Company's operational business functions and its service providers are adhering to their obligations. The Head of Compliance regularly reports to the Board on their assessment of the effectiveness and adequacy of compliance within the Company and its service providers. The effectiveness of the Compliance function's framework and operations are subject to periodic review by Internal Audit.

Management of the Company, and its service providers, are responsible for notifying the Head of Compliance of any breach of applicable laws and regulations that fall within the scope of their responsibilities. Upon receipt of notification, the Head of Compliance records the relevant breach item in the Company's breach register and discusses remedial actions with the management concerned. Where appropriate, reporting is made to the Board and to the CBI.

## B.5 INTERNAL AUDIT FUNCTION

The role of Internal Audit is to aid the Board and the ExCo to protect the assets, reputation, and sustainability of the organisation.

The Company has a dedicated Internal Audit Function ("**Function**"), which is managed by the Head of Internal Audit and governed by an Internal Audit Charter, approved by the Audit Committee and Board.

The Function uses a risk-based approach to establish its annual Internal Audit plan ("**Plan**"). This risk-based approach is supported by an audit universe, to ensure there is adequate coverage of business activities (with a particular focus on the higher risk areas of the business). The Plan is formally approved by the Audit Committee with monthly updates provided by the Head of Internal Audit to the ExCo and periodically to the Audit Committee, with any changes approved by the Audit Committee.

The Function identifies the key risks relevant to the scope of each audit (on the Plan). The Function tests the adequacy and effectiveness of the controls - as owned and operated by the business - that mitigate those risks. An Internal Audit report is provided to the relevant members of the ExCo and the Audit Committee, upon completion of the audit. Findings are included in the report along with any agreed remedial management actions to address any findings.

Internal Audit tracks the progress and completion of agreed remedial management actions. Internal Audit reports the status of agreed remedial management actions at the monthly ExCo and the quarterly Audit Committee meetings.

The Function derives its ultimate authority from the company Board via responsibilities assigned to the Audit Committee. The Head of Internal Audit reports functionally to the Chair of the Audit Committee to maintain independence and administratively (and for the purpose of executive communication) to the Group CEO. The Head of Internal Audit has direct access to the Chair of the Audit Committee.

To ensure independence, the Internal Audit Charter requires that the Internal Audit Function:

- Remains free from interference over audit selection, scope, procedures, frequency, timing, or report content;

- Has no direct operational responsibility or authority over any of the activities audited;
- Exhibits professional objectivity in gathering, evaluating, and communicating information;
- Considers the use of external resources, where required to preserve independence or to ensure sufficient expert knowledge of the audit subject matter;
- Will confirm to the Audit Committee, at least annually, the organisational independence of Internal Audit; and
- May hold sessions with the Audit Committee where the ExCo members are not present.

Any potential impairment to independence and/or objectivity of the Function is reported directly to the Audit Committee.

During the year the Function was outsourced via an intra-group outsourcing arrangement, with a specified individual holding the role of Head of Internal Audit.

## **B.6 ACTUARIAL FUNCTION**

The Actuarial Function is managed by the Company's HoAF, whose main responsibilities are;

- The coordination of the calculation of technical provisions;
- Ensuring the appropriateness of the methodologies and underlying models used as well as the assumptions made in the calculation of technical provisions;
- Assessing the sufficiency and quality of the data used in the calculation of technical provisions;
- Comparing best estimates against experience;
- Informing the Board of the reliability and adequacy of the calculation of technical provisions;
- Overseeing the calculation of technical provisions in the cases set out in the Solvency II Regulations;
- Expressing an opinion on the Technical provisions;
- Expressing an opinion on the overall underwriting policy;
- Expressing an opinion on the adequacy of reinsurance arrangements; and
- Contributing to the effective implementation of the risk-management system, including an opinion on the ORSA.

During the year Actuarial Function was outsourced via an intra-group outsourcing arrangement, with a specified individual holding the HoAF role. The role of HoAF is now performed by a dedicated full time internal employee who joined the Company in early 2025.

## **B.7 OUTSOURCING**

Outsourcing is the delegation of a process, function, service or activity to a service provider. The service provider can be both intra-group or an external firm. In considering whether to outsource any process, service or activity, the Company will take into account:

- its own resource levels and availability;
- its own internal capabilities and cost structures;
- the timing and extent of any requirements in comparison with the capabilities; and
- costings and security of an outsource service provider.

The overarching principle will be that where processes, functions, services or activities may be delegated to an outsourced service provider, ultimate responsibility for those processes, functions, services and activities will remain with the Company and ultimately the Board.

The Company has an outsourcing policy, the purpose of which is to establish the requirements for identifying, justifying, and implementing any outsourcing arrangements in respect of its critical and /or important functions and / or activities ("**CIFAs**"). The main objective of the outsourcing policy is to ensure that the outsourcing of any CIFAs does not lead to:

- Reduction in the Board's responsibility for, or influence over key functions of the Company;

- Material impairment of the quality of the Company's system of Governance;
- Non-adherence to the Company's approved policies and procedures;
- Undue increases in operational risk or cost;
- Material impairment of the Company's ability to fulfil its obligations to stakeholders, nor impede effective supervision by regulators;
- Conflicts of Interest;
- Breach of the Company's data protection obligations.

The Board is ultimately responsible for the approval and termination of all outsourcing arrangements in respect of CIFAs. CIFAs include key functions of the Company's system of governance and all functions within the Company that are fundamental to carrying out its core business. The Board is responsible for ensuring the performance of outsourced service providers is monitored and assessed against the agreed Service Level Agreements, Schedule of Services and Key Performance Indicators.

The Company's outsourcing lifecycle incorporates the following components / activities:

- Due diligence and risk assessment in respect of the outsourced service provider
- Service Level Agreement, including Schedule of Services and Key Performance Indicators
- Management and monitoring of outsourcing arrangements with risks and controls assessed
- Contingency Planning and Exit Strategies are in place
- The ongoing assessment of outsourcing arrangements

Summary of CIFAs as at 31 December 2024			
Key Function or Activity	Description	Service Provider	Location of Service provider
Internal Audit Function	Provision of Internal Audit Services	A qualified individual via the RiverStone Group	UK
Head of Actuarial Function	Provision of Head of Actuarial function Services	A qualified individual via the RiverStone Group	UK
Corporate services	Provision of services, including support services relating to Investment management, Human resources, IT & Facilities, Legal and M&A.	RiverStone Group	UK
Claims handlers	Provision of claims handling services	Pro Insurance Solutions GmbH	Germany
Investment Managers	Provision of Investment portfolio management services.	Goldman Sachs Asset Management	UK

Specific members of the ExCo have been allocated responsibility for each outsourced arrangement.

## B.8 ANY OTHER INFORMATION

Not applicable

## C. RISK PROFILE

The Company's material risks include the following, Underwriting risk, Market risk, Credit risk, Liquidity risk and Operational risk. The following sections describes each of these risks, including an overview of the risk exposure and details on how the risk is managed. Chapter E provides a quantitative assessment per the standard formula SCR on each of these risks.

### C.1 UNDERWRITING RISK

Underwriting or insurance risk is concerned with fluctuations in the timing, frequency and severity of insured events, relative to expectations at the time of underwriting. Given the Company's run-off status, the principal insurance risk the Company is subject to is reserve risk, whereby there is potential for future claims to deteriorate beyond the Company's estimates. This is influenced by the frequency of claims, severity of claims, actual benefits paid and subsequent development of long-term claims.

The Company operates a board approved Technical Provisions policy, which sets out the responsibilities, process and reporting requirements to manage this risk. The Company takes a prudent approach to manage this risk, which is actively monitored by the risk management cycle and active reporting to management and to the Board.

Solvency II claims provisions are determined by applying appropriate actuarial techniques as are calculated in line with Solvency II requirements. They are calculated on a discounted net best estimate basis and include an allowance for expense and Events not in Data (ENIDs) loading to reflect the requirement that the claims provisions best estimate should reflect all possible outcomes. The estimation and measurement of the Solvency II claims provisions is a key factor in determining the Company's result and financial position. The shift from a prolonged period of low inflation to a period of possible high inflation creates a level of uncertainty on the severity of the claims, claims inflation has been explicitly considered in the Solvency II claims provisions.

The Company is making Periodic Payment Order ("PPO") payments to several claimants in the UK and similar long-term payments to claimants in Germany. These are essentially life annuities, on the order of the relevant court, typically to pay for care and/or loss of earnings. Therefore, although the Company is a non-life insurance Company, it is exposed to life risk. The life risks to which the Company is exposed to are a) longevity risk (the claimant lives longer than expected), b) revision risk (the payment to the claimant increases), and c) expense risk (the administration expenses associated with making each payment increases), although this is immaterial.

The total best estimate, net of reinsurance, for 2024 are €197million (2023; €59 million).The change during the year is a result of a commutation of an intra group reinsurance arrangement as part of the change in ownership in February 2024 offset by the annual reduction on claims with payments settled.

The Company monitors the effectiveness of the mitigation techniques to manage underwriting risk though the following:

- Actual underwriting results are monitored against budgeted results on a monthly basis.
- Claims reserves gross and net, are reviewed actuarially bi-annually and compared to the business plan.
- Notified claims and reserves, and reinsurance recoveries are compared to plan.

The above process incorporates identification, measurement and explanation of variances which are reported to senior management. Given the Company's run-off status, management focuses primarily on variances in claims reserves.

Strict claim review policies are in place to assess all new and ongoing claims, regular detailed review of claims handling procedures and frequent review of all claims are the key policies and procedures put in place to reduce the risk exposure of the Company. The Company further enforces a policy of actively managing and promptly pursuing claims, in order to reduce its exposure to unpredictable future developments that can negatively impact

the business. Inflation risk is mitigated by taking expected inflation into account when estimating insurance contract liabilities.

In addition, the Company apply the following controls:

- Bi-annual loss reserving committee to rigorous review and challenge the claims provisions
- An independent assessment of the effectiveness of retrocession arrangements conducted by the Head of Actuarial Function.
- Opinions provided by the Head of Actuarial Function on the underwriting policy, the adequacy of technical provisions and the ORSA process
- Regular monitoring of reserve movements through risk appetite.
- External assurance through independent reserve reviews; and
- Regular reporting on the outcome of risk and control assessments to the ExCo, Risk Committee and Board.

As part of the ORSA process, a range of stress tests and scenarios were conducted, which considered underwriting risk, in particular reserve risk and assessed the impact of a deterioration on reserve and its impact on the Company SCR position. The impact of the stresses highlighted the resilience to reserve risk and did not result in a material reduction of the SCR below 100%. None the less, management actions were detailed.

## C.2 MARKET RISK

Market risk is the risk of adverse financial impact as a consequence of market movements such as currency exchange rates, interest rates, other price changes and spread risk. Market risk arises due to fluctuations in both the value of assets held and the value of liabilities.

The Company's exposure to market risk is predominantly in its investment portfolio. The Company principally invests in:

- Government Bonds
- Corporate Bonds
- Collective investment undertakings
- Bank deposits
- Loans and mortgages
- Cash

The Company operates a Board approved Investment policy, which set out the responsibilities, process and reporting requirements to manage investment risk. The investment risk policy governs the Company's exposure to market risks. Exposures are controlled by the setting of investment limits in line with the Company's risk appetite framework and strategic asset allocation. The Investment policy is applied by the Investment team (intra-group outsourcing arrangement), who are responsible for making and implementing investment decisions on behalf of the Company in line with the Investment policy, risk appetite framework and strategic asset allocation policy, all of which are approved by the Board.

The primary goal of the Company's investment strategy is to maximise investment returns within the risk appetite framework. The investment management philosophy is implemented through both internal investment management decisions and the assistance of external investment managers to best achieve the objectives of the Investment policy. Investments are held at fair value, with changes in fair value recorded through the profit and loss account as their performance is actively monitored and they are managed on a fair value basis.

### Interest rate risk

Interest rate risk is the risk that the value of future cash flows of a financial instrument will fluctuate because of changes in market interest rates. The Company is exposed to interest rate risk as it invests in long term investments.

The sensitivity analyses below have been determined based on the exposure to interest rates for investments held at the accounting balance sheet date. A 1% increase or decrease is used when reporting interest rate risk internally to key management personnel and represents management's assessment of the reasonably possible change in interest rates.

	Pre-tax profit		Shareholders' equity	
	2024	2023	2024	2023
	€000	€000	€000	€000
1% increase	(452)	(3,420)	(396)	(2,992)
1% decrease	457	3,420	400	2,992

The sensitivity to interest rates is mitigated in local solvency terms, as the value of its future claims also depends on interest rates. Therefore, the value of assets and liabilities both tend to reduce when interest rates increase, and liabilities increase when interest rates fall.

### Foreign exchange risk

The Company undertakes certain transactions denominated in foreign currencies, therefore, exposures to exchange rate fluctuations arise. The risk of exposing the Company's assets or liabilities to exchange rate fluctuations is managed by broadly matching liabilities with assets in the same currencies.

The Company reviews assets and liabilities by currency each month to ensure they are matched where possible and that cash is available to discharge liabilities in their respective currencies. A detailed analysis of liability payout patterns to extinction by currency is then matched to the asset cashflows to eliminate material currency risk. From time to time, the Company utilises foreign currency forward contracts as part of its overall foreign currency risk management strategy or to obtain exposure to a particular financial market, as well as for yield enhancement. These derivatives are not designated as hedging investments.

The most significant currency to which the Company is exposed is pounds Sterling (2023: Sterling). On 31 December 2024, if Euro had weakened/strengthened by 20% against pounds Sterling, with all other variables held constant, shareholder's funds would have been €0.3 million (2023: €0.4 million) higher/lower.

### Other price risk

The Company is exposed to price risk arising from fluctuations in the value of financial instruments as a result of changes in the market prices and the risks inherent in all investments. The Company has no significant concentration of price risk. The risk is managed by the Company by maintaining an appropriate mix of investment instruments.

The Company's sensitivity to a 1% increase and decrease in market prices is detailed in the table below:

	2024	2023
	€000	€000
<b>1% increase</b>		
Movement in fair value of share and other variable securities in unit trusts	802	309
Movement in fair value of debt securities and other fixed income securities	2,509	629
<b>1% decrease</b>		
Movement in fair value of share and other variable securities in unit trusts	(802)	(309)
Movement in fair value of debt securities and other fixed income securities	(2,509)	(629)

### Spread risk

The Company seeks to limit its exposure to spread risk by investing in investment grade quality assets covering technical provisions. The risks are mitigated by investing in Government bonds.

The Company monitors the effectiveness of the mitigation techniques to manage Market risk through the following:

- Monitoring and reporting against the strategic asset allocation
- Monitoring and reporting against investment Risk appetite
- Regular reporting by the Chief Investment Officer on the investment portfolio, including performance
- Regular reporting on the outcome of risk and control assessments to the Risk Committee/Board

As part of the ORSA process, various stresses are conducted which consider exposure to market risk, including a reduction in the portfolio value. The impact of the scenario combined with an underwriting scenario, did not result in a material reduction of the SCR below 100%, nonetheless management actions were detailed.

### C.3 CREDIT RISK

Credit risk refers to the risk that a counterparty will default on its contractual obligations resulting in financial loss to the Company. The key areas of exposure to credit risk for the Company are in relation to its investment portfolio and reinsurance programme.

The Company operates a Board approved Investment policy and Retrocession risk policy which set out the responsibilities, process and reporting requirements to manage credit risk. The objective of the Company in managing its credit risk is to ensure risk is managed in line with the Company's risk appetite.

The Company monitors the effectiveness of the mitigation techniques to manage credit risk through:

- Regular monitoring of reinsurance counterparty credit ratings
- Regular monitoring of credit rating of investments
- Regular reporting on the outcome of risk and control assessments to the Risk Committee/Board

The following table shows aggregated credit risk exposure for assets with external credit ratings. The table also shows the carrying value of assets that are neither past due nor impaired, the ageing of assets that are past due



but not impaired and assets that have been impaired. The factors considered in determining whether the value of an asset is impaired are analysis of impairment, ageing of balances, past loss experience, current economic conditions and other relevant circumstances. As previously mentioned, the intra-group reinsurance arrangement was commuted as part of the change in ownership in February 2024.

	2024	2023
	€000	€000
<b>By class of asset:</b>		
Shares and other variable yield securities in unit trusts	80,153	30,933
Debt securities	250,924	62,872
Other debtors	750	-
Assets arising from reinsurance contracts held	2,415	260,728
Debtors arising out of direct insurance operations	6,659	13,672
Accrued interest	2,305	519
Cash and cash equivalents	13,581	9,733
<b>Total assets bearing credit risk</b>	<b>356,787</b>	<b>378,457</b>
<b>By credit rating:</b>		
AAA	75,360	22,550
AA	36,274	6,741
A	49,227	18,203
BBB	95,905	27,888
Below BBB or not rated	100,022	303,075
<b>Total assets bearing credit risk</b>	<b>356,787</b>	<b>378,457</b>
<b>By past due aging:</b>		
Neither past due nor impaired	356,786	378,456
Past due less than 30 days	1	1
Past due less 31 to 60 days	-	-
Past due less 61 to 90 days	-	-
Past due more than 90 days	-	-
Past due and impaired	-	-
<b>Total assets bearing credit risk</b>	<b>356,787</b>	<b>378,457</b>

## C.4 LIQUIDITY RISK

Liquidity risk is the risk that the Company cannot meet its obligations associated with financial liabilities as they fall due. The Company manages liquidity risk by monitoring forecast and actual cash flows and matching the maturity profiles of assets and liabilities. Liquidity management ensures that the Company has sufficient access to funds necessary to cover insurance claims. Most of the Company's assets are marketable securities which could be converted into cash when required. The Company previously participated in Catalina's cash pooling arrangement which provides access to immediate, short-term liquidity. The Company's participation in the cash pool ceased following change in ownership in February 2024.

The Company operates with a Board approved Liquidity risk policy and an Asset Liability risk policy, which set out the responsibility, process and reporting requirements to manage this risk. The Company also has a Board risk appetite for liquidity risk. The Company's exposure to liquidity is deemed as low, as it principally maintains a high-quality investment portfolio, of which most of the Company securities are marketable securities, which can be converted into cash if required. There is no significant concentration to illiquid assets.

The Company monitors the effectiveness of the mitigation techniques to manage liquidity risk through:

- Regular monitoring of the Key Risk Indicators for liquidity risk
- Regular reporting on the outcome of risk and control assessments to the Risk Committee/Board

The following table shows details of the expected maturity profile of the Company's undiscounted obligations with respect to its financial liabilities and estimated cash flows of recognised insurance and participating investment contract liabilities. Unearned premiums are excluded from this analysis. The table includes both interest and principal cash flows.

	Less than 1 year	1 - 5 years	5+ years	Total
	2024	2024	2024	2024
	€000	€000	€000	€000
<b>Financial liabilities and claims outstanding</b>				
Subordinated loan notes	-	24,187	-	24,187
Creditors arising out of direct insurance operations	11	-	-	11
Other creditors	1,451	-	-	1,451
Claims outstanding - undiscounted	21,575	72,915	159,290	253,780
	<b>23,037</b>	<b>97,102</b>	<b>159,290</b>	<b>279,429</b>
	<b>2023</b>	<b>2023</b>	<b>2023</b>	<b>2023</b>
	<b>€000</b>	<b>€000</b>	<b>€000</b>	<b>€000</b>
<b>Financial liabilities and claims outstanding</b>				
Subordinated loan notes	-	24,056	-	24,056
Creditors arising out of direct insurance operations	-	-	-	-
Other creditors	305	-	-	305
Claims outstanding - undiscounted	28,497	80,109	210,144	318,750
	<b>28,802</b>	<b>104,165</b>	<b>210,144</b>	<b>343,111</b>

### Prudent Person Principal

The Company applies the Prudent Person Principal in managing Market, Credit and Liquidity risk. The Company's investment risk policy is consistent with the Prudent Person Principle.

- The responsibility of the Investment function is to abide by the Prudent Person Principle with respect to management of investment assets
- Abiding by the Prudent Person Principle is part of the Company Investment risk Policy risk mitigation strategies
- In setting the Strategic asset allocation, the Prudent Person Principle must be considered

The Prudent Person Principal requirements are included in the investment policy as summarised below;

- Will only invest in assets the risks of which can be properly identified, measured, monitored, managed and controlled.
- Will only invest all assets, in particular those covering the MCR and SCR, in such a way as to ensure the security, quality, liquidity and availability of the portfolio.
- Will invest assets held to cover the technical provisions in a manner appropriate to the nature and duration of its insurance and reinsurance liabilities.
- Will diversify in such a way as to avoid excessive reliance on any particular asset, issuer or group of undertakings or geographical area and excessive accumulation of risks as a whole in respect of MCR and SCR and Technical Provisions.

### Expected Profit in Future Premium

The Company has no expected profit in future premium. The company portfolio is in run off, with no premiums being underwritten.

## C.5 OPERATIONAL RISK

Operational risk relates to the possibility that the Company becomes exposed to losses occurring as a result of failures within its internal systems, processes, people or external events. It is anticipated that the regular compliance/risk monitoring and audits by Internal Audit and the statutory auditor will assist identify any existing or potential areas of weakness within the Company's internal systems and process.

Operational risks that the Company may be or is exposed to are as follows:

- **Key Person Dependency & Succession Planning (People):** The Company is susceptible to key person issues and subsequent operational issues in the event of key person loss
- **Outsourcing:** Failure to Manage Outsourcing Arrangements, third party and intra group due to inadequate systems, controls or oversight.
- **Claims handlers:** The risk of failing to manage claims handlers, including oversight of financial stability, due to inadequate systems or controls, resulting in claims being handled outside the terms of the agreement(s)
- **Cyber Risk:** Unauthorized access, modification or loss of data or systems due to cyber-attacks leading to adverse financial, reputational and regulatory implications
- **Regulatory risk:** The risk of failing to comply with regulatory requirements, due to regulatory changes, human error or system, process or control failures, which may result in a regulatory intervention.

- **Delivery and Execution risk:** The risk of failing to deliver the Company strategy, including execution of strategic plans and implementation of change management / projects that support the underlying business model.

The Company operates an operational risk policy, which sets out the responsibilities, process and reporting requirements to manage this risk. Other Board approved policies such as fraud, information security and outsourcing support the operational risk policy in assessment, managing and mitigation specific operational risks.

Operational risks are actively managed and mitigated in accordance with the risk management cycle set out in Section B. Operational risk is monitored through risk appetite with key risk indicators defined and mitigation plans in place for risks deemed material. There were no material breaches of the operational risk appetite during the year. A monitoring process is in place for operational risk incidents and near miss events which incorporates the identification, recording and assessment of incidents / events with root cause analysis and reporting. Contingency plans are in place to reduce the likely impact from any major events (e.g. IT system failure, failure of key outsourced provider or the loss of key employee(s)).

The Company monitors the effectiveness of the mitigating techniques to manage operational risk through:

- Regular reporting on the outcome of risk and control assessments to the ExCo, Risk Committee and the Board.
- Quarterly reporting of operational risk events and near misses to the Risk Committee and the Board.
- Regular updates on operational resilience provided to the ExCo, the Risk Committee and the Board.

As part of the ORSA process, it is considered whether additional capital above what is required for the SCR standard formula calculation. No individual operational scenario was identified during the process that would materially reduce the SCR below the 100% and no additional capital was deemed necessary to cover operational risk.

## C.6 OTHER MATERIAL RISKS

### Emerging Risks

Run-off carriers tend to be somewhat isolated from exogenous emerging risks which may change the frequency and severity of loss distributions used to price and accumulate portfolios of live insurance risk. Since the loss has already occurred the Company focuses its attention on reserve, investment and regulatory emerging risks and their mitigants. The Board Risk Committee plays an important role in assessing whether there are new emerging risks facing the Company in addition to its assessment of changes in existing risks. On an ongoing basis the Risk function identifies emerging risks, and where relevant, these risks are added to the Company's risk register so that appropriate mitigation can be considered.

### Inflation Risk

Inflation has continued to be a focus during the year. Higher inflation, particularly over long periods, can impact both the Company's claims reserves and the value of its investment portfolio. The Company's long-term claims are most at risk to inflation. On the investment portfolio, the aim is to match liabilities across duration for interest rate risk and inflation and this is regularly monitored.

## C.7 ANY OTHER INFORMATION

Not applicable.

## D. VALUATION FOR SOLVENCY PURPOSES

### D.1 ASSETS

The value of each material class of assets is provided in the table below, comparing the carrying value in the financial statements to the valuation used for solvency purposes. The valuation basis is also described, with details provided of any material differences between the valuation basis used in the financial statements and the valuation basis under solvency II.

	Notes	Statutory accounts	Solvency II value
		€000	€000
Cash, investments and accrued interest		346,994	346,994
Reinsurers' share of technical provisions	1	2,415	2,302
Debtors arising out of direct insurance operations		6,659	6,659
Other assets		778	778
<b>Total assets</b>		<b>356,846</b>	<b>356,733</b>

**Notes:**

1. Difference due to difference between Irish GAAP and Solvency II regime, mainly due to non-discounting and additional prudence margins under GAAP.

### D.2 TECHNICAL PROVISIONS

The technical provisions comprise the best estimate of liabilities and risk margin according to Articles 75 to 86 of the Solvency II Directive. The best estimate technical provision is the sum of the claims provision and the premium provision.

The claims provision is the discounted best estimate of all future cashflows relating to claim events prior to the valuation date, including claims which have not yet been notified to the (re)insurer. Hence the claims provision is calculated as the expected present value of claims incurred, including incurred but not reported claims ("IBNR"), plus future expenses incurred to settle these claims, less future premium receivable in relation to the past exposure.

The premium provision is the discounted best estimate of all future cashflows relating to future exposure arising from policies that the (re)insurer is obligated to at the valuation date. Hence the premium provision is calculated as the expected present value of future claims from future exposure, plus future expenses incurred to settle these claims, less future premium receivable in relation to future exposure.

The risk margin represents the amount that another (re)insurer taking on the liabilities would require over and above the best estimate technical provisions. This is calculated using a cost-of-capital approach. The risk margin calculation is dependent on the SCR which itself is dependent on the best estimate technical provisions.

The table below shows the total technical provisions, gross and net of reinsurance on 31 December 2024, together with comparatives for the previous year.

	Gross Best Estimate	Net Best Estimate	Risk margin
	2024	2024	2024
	€000	€000	€000
<b>By material line of business:</b>			
Motor	810	810	81
Liability	132,804	132,804	13,276
Other	63	21	-
Annuities stemming from non-life insurance contracts	65,367	63,107	7,690
	<b>199,044</b>	<b>196,742</b>	<b>21,047</b>
	<b>2023</b>	<b>2023</b>	<b>2023</b>
	<b>€000</b>	<b>€000</b>	<b>€000</b>
<b>By material line of business:</b>			
Motor	3,938	1,385	136
Liability	147,161	54,694	5,352
Other	907	0	0
Annuities stemming from non-life insurance contracts	85,184	2,798	3,076
	<b>237,190</b>	<b>58,877</b>	<b>8,564</b>

The Company has adopted a deterministic approach to estimating the BEL by making the following adjustments to the GAAP reserves in the Company's statutory accounts:

- The GAAP reserves include an explicit prudence margin for uncertainty. In the Solvency II balance sheet this prudence margin is removed, as technical provisions are intended to be best estimates.
- Solvency II reserves are discounted at the risk-free rate. The GAAP reserves are undiscounted.
- An ENID (events not in data) was included in the Solvency II balance sheet.
- An increased expense provision was included in the Solvency II balance sheet.

The total of these adjustments results in the technical provisions on the Solvency II balance sheet being €16 million lower than the technical provisions shown in the financial statements.

The main risks and uncertainties associated with the technical provisions relate to the following:

- *Risk-free rates:* whilst those used as at a given date are prescribed and provided by EIOPA, they are volatile over time. The Company has long tail liabilities arising from UK PPOs and German annuities, and there are uncertainties over future risk-free rates which cause long term Best Estimate of Liabilities to be volatile (other liabilities are also affected, but the impact is less material).
- *Unavoidable risk associated with the technical provisions:* claims provisions are best estimates of future costs, both in terms of the amounts of future cashflows, but outcomes will inevitably differ from any prior estimate.
- The Company's business model is to manage claims actively. The technical provisions assume the run-off of claims over time as they are estimated to become due. This difference results in actual technical provision tending to reduce over time more quickly than the estimates used in the BEL.
- The active management of claims tends to involve actual expenses being higher than those assumed in the technical provisions. One cause of this is the employee costs of the relevant employees who do the active claims management.
- *ENIDs and expense provisions:* these necessarily rely on expert judgements (especially ENIDs) and so there are uncertainties associated with these being too high or too low.

### **D.3 OTHER LIABILITIES**

In November 2016 the Company issued €23.8 million of floating rate subordinated loan notes. The notes are due in January 2027, and they are listed on the Channel Island Stock Exchange. Interest on the notes is based on EURIBOR plus a margin of 7.95%. The notes are eligible to count towards the Company's Tier 2 basic own funds based on the criteria as set out in the Solvency II Framework Directive (2009/138/EC), the European Union (Insurance and Reinsurance) Regulations 2015 and Commission Delegated Regulation (EU) 2015/35.

### **D.4 ALTERNATIVE METHODS FOR VALUATION**

No other alternative methods for valuation are used.

### **D.5 ANY OTHER INFORMATION**

Not applicable.

## E. CAPITAL MANAGEMENT

The Company uses the standard formula as defined by EIOPA to calculate the SCR. It has been deemed appropriate for use given the risk profile of the Company.

The Company Own Funds are Tier 1 (€110 million) and Tier 2 (€24 million), with the eligible Own funds of €134 million to cover SCR of €64 million. The SCR ratio is 208%. There are eligible Own funds of €113 million to cover MCR of €16 million and the MCR ratio is 702%. The Company was in compliance with regulatory capital requirements throughout the financial year.

The ORSA process as outlined in chapter B, considers the capital required to cover the risks of the business exposed to over the business plan period (3 years) and the adequacy of the capital to withstand a range of stresses and scenarios. The ORSA process provides reasonable assurance that the Company can withstand the risks the Company is or may be exposed to over the business plan horizon.

During the period, the intra-group reinsurance arrangement (with Catalina Group) was commuted as part of the change in ownership, and the Company received €73.7 million of capital from its new parent. This transaction has impacted on the Own Funds and SCR as described below.

### E.1 OWN FUNDS

The Company operates with a Board approved Capital Management Policy, setting out the approach to manage capital in a manner aligned to the Company's business strategy. The policy specified the objectives, responsibilities, process and reporting relating to the management of capital. The Capital management objectives are

- To maintain sufficient capital to support the current business and ensure ongoing policyholder protection
- To seek to enhance shareholder value by efficient run off of existing portfolio of business and through the ongoing consideration of acquisition opportunities.
- To comply with relevant Solvency Guidance and legislation applicable to capital management

An assessment of the Company's own funds for eligibility is complete throughout the year, including during the business plan preparation and per the annual review of the Capital Management Policy of current and possible classification of own fund types.



The table below shows the Company's own funds at 31 December 2024

	Tier 1	Tier 2	Tier 3	Total
	-	-	-	-
<b>Basic own funds</b>				
Ordinary share capital	52,717	-	-	52,717
Share premium account related to share Capital	73,738	-	-	73,738
Reconciliation reserve	(27,769)	-	-	(27,769)
Subordinated liabilities	-	24,187	-	24,187
Other own funds items	11,000			11,000
<b>Total basic own funds</b>	<b>109,685</b>	<b>24,187</b>	<b>-</b>	<b>133,872</b>
<b>Available and eligible own funds</b>				
Total available own funds to meet the SCR	109,685	24,187	-	133,872
Total available own funds to meet the MCR	109,685	24,187	-	133,872
Total eligible own funds to meet the SCR	109,685	24,187	-	133,872
Total eligible own funds to meet the MCR	109,685	3,216	-	112,902
<b>SCR</b>				<b>64,328</b>
<b>MCR</b>				<b>16,082</b>
<b>Ratio of Eligible own funds to SCR</b>				<b>208.1%</b>
<b>Ratio of Eligible own funds to MCR</b>				<b>702.0%</b>

Notes; Tier 2 and Tier 3 items are subject to eligibility rules for meeting the SCR and MCR. For meeting the SCR, the sum of the eligible amounts of Tier 2 and Tier 3 items shall not exceed 50% of the SCR, and for meeting the MCR, the sum of the eligible amounts of Tier 2 and Tier 3 items shall not exceed 20% of the MCR.

### Own Funds notes

The following are notes to the Own funds per the table above;

- In November 2017, the Company issued €24 million in subordinated loan notes which increased the Tier 2 own funds regulatory capital of the Company in accordance with the provisions of the Solvency II directive.
- In March 2018, the Company issued share capital of €52 million to support the acquisition of the German MedMal portfolio from ZIP.
- In May 2019, the Company received a capital contribution of €11 million from its parent, in line with the Company's Capital Management Plan, after the regulatory solvency coverage fell below the internal target ratio.
- In February 2024 the intra-group reinsurance arrangement (with Catalina Group) was commuted as part of the change in ownership, and the Company received €73.7 million of capital from its new parent, RiverStone in February 2024.
- The reconciliation reserve represents the reserves of the Company (e.g. retained earnings) and results mainly from differences between accounting valuation and valuation according to the Solvency II directive. This reserve had a positive movement during the period, principally due to the Company returning to profitability in 2024.

The table below shows the Company's own funds at 31 December 2023, for comparative purposes.

	Tier 1	Tier 2	Tier 3	Total
	€000	€000	€000	€000
<b>Basic own funds</b>				
Ordinary share capital	52,717	-	-	52,717
Reconciliation reserve	(39,225)	-	-	(39,225)
Subordinated liabilities	-	24,056	-	24,056
Other own funds items	11,000			11,000
<b>Total basic own funds</b>	<b>24,492</b>	<b>24,056</b>	<b>-</b>	<b>48,548</b>
<b>Available and eligible own funds</b>				
Total available own funds to meet the SCR	24,492	24,056	-	48,548
Total available own funds to meet the MCR	24,492	24,056	-	48,548
Total eligible own funds to meet the SCR	24,492	15,069	-	39,561
Total eligible own funds to meet the MCR	24,492	1,507	-	25,999
<b>SCR</b>				<b>30,139</b>
<b>MCR</b>				<b>7,535</b>
<b>Ratio of Eligible own funds to SCR</b>				<b>131.3%</b>
<b>Ratio of Eligible own funds to MCR</b>				<b>345.0%</b>

Notes; as above

#### Material differences between Own funds under Solvency II and the Capital and reserves under GAAP

	2024
<b>Equity per Financial statements</b>	
Ordinary share capital	52,717
Share premium	73,738
Capital contribution	11,000
Fair value reserves	(989)
Profit and loss account	(10,317)
<b>Total Equity per Financial statements</b>	<b>126,149</b>
<b>Adjustments for Solvency II</b>	
<b>Differences in Technical provisions and related differences</b>	<b>16,464</b>
Deferred tax	-
Other	-
<b>Solvency II Own funds – Tier 1</b>	<b>109,685</b>

The principal difference is the valuation is the underlying calculation and treatment of technical provisions. Chapter D provides more detail on all change from local GAAP to Solvency II.

### **Transitional Arrangements**

None of the Company Own funds are subject to the transitional arrangements as referred to in article 308b (9) and 308 b (10) of the Solvency II directive.

### **Ancillary own funds**

The Company has no ancillary own funds.

### **Deductions and Restrictions**

Tier 2 and Tier 3 items are subject to eligibility rules for meeting the SCR and MCR. For meeting the SCR, the sum of the eligible amounts of Tier 2 and Tier 3 items shall not exceed 50% of the SCR, and for meeting the MCR, the sum of the eligible amounts of Tier 2 and Tier 3 items shall not exceed 20% of the MCR.

- In 2023 there was restriction on the Tier 2 subordinate liabilities eligibility, in respect of SCR, this is not required in 2024 as the SCR has increased.
- In 2023 and 2024 there is a restriction on the Tier 2 subordinate liabilities eligibility, in respect of MCR.

## E.2 SOLVENCY CAPITAL REQUIREMENT AND MINIMUM CAPITAL REQUIREMENT

### Solvency Capital Requirements

The table below shows the components of the SCR at 31 December 2024, together with comparatives for the previous year.

	2024	2023
	€000	€000
<b>By risk module</b>		
Market risk	21,836	11,044
Default risk	7,423	3,343
Non-life risk	43,920	17,884
Life risk	10,261	617
<b>Basic SCR before diversification</b>	<b>83,440</b>	<b>32,888</b>
Diversification Benefits	(23,416)	(7,693)
<b>Basic SCR</b>	<b>60,024</b>	<b>25,195</b>
Operational risk	4,304	4,944
<b>SCR</b>	<b>64,328</b>	<b>30,139</b>
<b>MCR</b>	<b>16,082</b>	<b>7,535</b>

The SCR has increased by €34m during the period, this is in principle due to a reinsurance agreement being commuted, as part of the change in ownership as noted above. This transaction and the related increase in Own Funds as described above, has impacted the following SCR risk modules:

- Non-Life/Life risk; as a result of the reinsurance commutation being executed, principally resulting in the best estimate technical provisions, net of reinsurance from €59 million to €197 million
- Market; Increase in total value of investments from €101million to €347 million
- Default risk; This is in principle due to an increase in a particular asset class, mortgage & loans, and partially offset by the reduction in reinsurance recoveries.

### Minimum Capital Requirements

The MCR represents the lowest acceptable level of capital that an insurer must hold to avoid regulatory intervention.

The MCR has increased during the period due to an increase in the best estimate technical provisions, net of reinsurance from €59 million to €197 million. The principal inputs to the Company's MCR is calculated as the sum of applying specified shock factors to the Company's best estimate technical provisions.

### Deferred taxes and Loss Absorbing Capacity of Deferred Taxes (LACDT)

The Company at this time does not have any deferred taxes nor within the SCR risk modules have a LACDT.

### **E.3 USE OF THE DURATION-BASED EQUITY RISK SUB-MODULE IN THE CALCULATION OF THE SOLVENCY CAPITAL REQUIREMENT**

The Company has not used the duration-based equity risk sub-module in the calculation of the SCR.

### **E.4 DIFFERENCE BETWEEN THE STANDARD FORMULA AND ANY INTERNAL MODEL**

The Company calculates the SCR using the standard formula. No internal or partial internal model is used in the calculation of the SCR.

### **E.5 NON-COMPLIANCE WITH THE MINIMUM CAPITAL REQUIREMENT AND SIGNIFICANT NON-COMPLIANCE WITH THE SOLVENCY CAPITAL REQUIREMENT**

There has not been any non-compliance with the SCR or the MCR over the financial year nor is there expected to be any non-compliance with the SCR and MCR in the business planning period.

### **E.6 ANY OTHER INFORMATION**

Not applicable.

## APPENDIX: Annual reporting templates

The quantitative reporting templates which form part of the Annual Regulatory Templates listed below are required to be published alongside the SFCR.

- S.02.01.02 Balance Sheet
- S.04.05.21 Premiums, Claims and Expenses - by country
- S.05.01.02 Premiums, Claims and Expenses - by line of business
- S.12.01.02 Life and Health Technical Provisions
- S.17.01.02 Non-life technical provisions by line of business
- S.19.01.21 Non-life insurance claims
- S.23.01.01 Own funds
- S.25.01.21 Solvency Capital Requirement using the Standard Formula
- S.28.01.01 Minimum Capital Requirement

**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
<b>Total assets</b>

	Solvency II value
	C0010
R0030	
R0040	
R0050	
R0060	31
R0070	309,470
R0080	2,182
R0090	
R0100	
R0110	
R0120	
R0130	253,230
R0140	119,443
R0150	133,787
R0160	
R0170	
R0180	40,991
R0190	304
R0200	12,764
R0210	
R0220	
R0230	36,979
R0240	
R0250	
R0260	36,979
R0270	2,302
R0280	42
R0290	42
R0300	
R0310	2,261
R0320	
R0330	2,261
R0340	
R0350	
R0360	6,659
R0370	
R0380	439
R0390	
R0400	
R0410	817
R0420	35
R0500	356,733

**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
<b>Total liabilities</b>
<b>Excess of assets over liabilities</b>

	Solvency II value
	C0010
R0510	147,034
R0520	147,034
R0530	
R0540	133,677
R0550	13,357
R0560	
R0570	
R0580	
R0590	
R0600	73,058
R0610	
R0620	
R0630	
R0640	
R0650	73,058
R0660	
R0670	65,367
R0680	7,690
R0690	
R0700	
R0710	
R0720	
R0740	
R0750	
R0760	
R0770	
R0780	
R0790	
R0800	
R0810	
R0820	11
R0830	
R0840	1,393
R0850	24,187
R0860	
R0870	24,187
R0880	1,365
R0900	247,047
R1000	109,685

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	C0015
<b>R0010</b>	<del>Home Country</del>	<del>GB</del>				<del>BE</del>
	C0010	C0020	C0021	C0022	C0023	C0024
<b>Premiums written (gross)</b>						
Gross Written Premium (direct)	<b>R0020</b>					
Gross Written Premium (proportional reinsurance)	<b>R0021</b>					
Gross Written Premium (non-proportional reinsurance)	<b>R0022</b>					
<b>Premiums earned (gross)</b>						
Gross Earned Premium (direct)	<b>R0030</b>					
Gross Earned Premium (proportional reinsurance)	<b>R0031</b>					
Gross Earned Premium (non-proportional reinsurance)	<b>R0032</b>					
<b>Claims incurred (gross)</b>						
Claims incurred (direct)	<b>R0040</b>	723				
Claims incurred (proportional reinsurance)	<b>R0041</b>					
Claims incurred (non-proportional reinsurance)	<b>R0042</b>					
<b>Expenses incurred (gross)</b>						
Gross Expenses Incurred (direct)	<b>R0050</b>					
Gross Expenses Incurred (proportional reinsurance)	<b>R0051</b>					
Gross Expenses Incurred (non-proportional reinsurance)	<b>R0052</b>					

Home country: Life insurance and reinsurance obligations

	Home Country	Top 5 countries: life				
		C0031	C0032	C0033	C0034	C0035
	<del>Home Country</del>					
	C0030	C0040	C0041	C0042	C0043	C0044
Gross Written Premium	<b>R1020</b>					
Gross Earned Premium	<b>R1030</b>					
Claims incurred	<b>R1040</b>					
Gross Expenses Incurred	<b>R1050</b>					





Annex I  
S.12.01.02  
Life and Health SLT Technical Provisions

Technical provisions calculated as a whole

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

**Best Estimate**  
**Gross Best Estimate**

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

Best estimate minus recoverables from reinsurance/SPV and Finite Re - total

**Risk Margin**  
**Technical provisions - total**

	Insurance with profit participation	Index-linked and unit-linked insurance		Other life insurance		Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Accepted reinsurance	Total (Life other than health insurance, incl. Unit Linked)	Health insurance (direct business)		Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Health reinsurance (reinsurance accepted)	Total (Health similar to life insurance)			
		Contracts without options and guarantees	Contracts with options or guarantees	Contracts without options and guarantees	Contracts with options or guarantees				Contracts without options and guarantees	Contracts with options or guarantees						
	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0150	C0160	C0170	C0180	C0190	C0200	C0210
<b>R0010</b>																
<b>R0020</b>																
<b>R0030</b>								65,367		65,367						
<b>R0080</b>								2,261		2,261						
<b>R0090</b>								63,107		63,107						
<b>R0100</b>								7,690		7,690						
<b>R0200</b>								73,058		73,058						



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											21,307	R0100	21,307	21,307
2015	R0160	248	496	142	192	24	-62	-1	0	4			R0160		1,044
2016	R0170	83	207	147	34	10	7						R0170		488
2017	R0180	59	81	25	3	2							R0180		170
2018	R0190	16	26	5	11								R0190		58
2019	R0200												R0200		
2020	R0210												R0210		
2021	R0220												R0220		
2022	R0230												R0230		
2023	R0240												R0240		
2024	R0250												R0250		
	<b>Total</b>												R0260	21,307	23,067

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		C0360	
Prior	R0100											150,971	R0100	133,664
2015	R0160		1,517	840	378	407	423	443	471	197	13		R0160	13
2016	R0170	2,571	604	410	385	353	305	279	63	-1			R0170	0
2017	R0180	2,349	354	309	300	288	295	55					R0180	
2018	R0190	69	14	32	5	-8	-7						R0190	
2019	R0200	-3	-7	-7	-8	-5							R0200	
2020	R0210	2	2										R0210	
2021	R0220												R0220	
2022	R0230												R0230	
2023	R0240												R0240	
2024	R0250												R0250	
	<b>Total</b>												R0260	133,677

Annex I  
S.23.01.01  
Own funds

	Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
	C0010	C0020	C0030	C0040	C0050
<b>Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35</b>					
Ordinary share capital (gross of own shares)	R0010	52,717	52,717		
Share premium account related to ordinary share capital	R0030	73,738	73,738		
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040				
Subordinated mutual member accounts	R0050				
Surplus funds	R0070				
Preference shares	R0090				
Share premium account related to preference shares	R0110				
Reconciliation reserve	R0130	-27,769	-27,769		
Subordinated liabilities	R0140	24,187		24,187	
An amount equal to the value of net deferred tax assets	R0160				
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180	11,000	11,000		

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

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

	R0220				
<b>Deductions</b>					
Deductions for participations in financial and credit institutions	R0230				
<b>Total basic own funds after deductions</b>	R0290	133,872	109,685	24,187	
<b>Ancillary own funds</b>					
Unpaid and uncalled ordinary share capital callable on demand	R0300				
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310				
Unpaid and uncalled preference shares callable on demand	R0320				
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330				
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340				
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350				
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360				
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370				
Other ancillary own funds	R0390				

	Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
	C0010	C0020	C0030	C0040	C0050
<b>Total ancillary own funds</b>	R0400				
<b>Available and eligible own funds</b>					
Total available own funds to meet the SCR	R0500	133,872	109,685	24,187	
Total available own funds to meet the MCR	R0510	133,872	109,685	24,187	
Total eligible own funds to meet the SCR	R0540	133,872	109,685	24,187	
Total eligible own funds to meet the MCR	R0550	112,902	109,685	3,216	
<b>SCR</b>	R0580	64,328			
<b>MCR</b>	R0600	16,082			
<b>Ratio of Eligible own funds to SCR</b>	R0620	208,11%			
<b>Ratio of Eligible own funds to MCR</b>	R0640	702,04%			

	C0060	
<b>Reconciliation reserve</b>		
Excess of assets over liabilities	R0700	109,685
Own shares (held directly and indirectly)	R0710	
Foreseeable dividends, distributions and charges	R0720	
Other basic own fund items	R0730	137,455
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	
<b>Reconciliation reserve</b>	R0760	-27,769
<b>Expected profits</b>		
Expected profits included in future premiums (EPIFP) - Life business	R0770	
Expected profits included in future premiums (EPIFP) - Non-life business	R0780	
<b>Total Expected profits included in future premiums (EPIFP)</b>	R0790	

**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**

	Gross solvency capital requirement	USP	Simplifications
	C0110	C0090	C0120
<b>R0010</b>	21,836		
<b>R0020</b>	7,423		
<b>R0030</b>	10,261		
<b>R0040</b>			
<b>R0050</b>	43,920		
<b>R0060</b>	-23,416		
<b>R0070</b>			
<b>R0100</b>	60,024		

**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

	C0100
<b>R0130</b>	4,304
<b>R0140</b>	
<b>R0150</b>	
<b>R0160</b>	
<b>R0200</b>	64,328
<b>R0210</b>	
<b>R0211</b>	
<b>R0212</b>	
<b>R0213</b>	
<b>R0214</b>	
<b>R0220</b>	64,328
<b>R0400</b>	
<b>R0410</b>	
<b>R0420</b>	
<b>R0430</b>	
<b>R0440</b>	

**Approach to tax rate**

Approach based on average tax rate

	Yes/No
	C0109
<b>R0590</b>	3 - Not applicable as LAC DT is not used (in this case R0600 to R0690 are not applicable)

**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

	LAC DT
	C0130
<b>R0640</b>	
<b>R0650</b>	
<b>R0660</b>	
<b>R0670</b>	
<b>R0680</b>	
<b>R0690</b>	

**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 <sub>NL</sub> Result		13,750
	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	810
Other motor insurance and proportional reinsurance	R0060	
Marine, aviation and transport insurance and proportional reinsurance	R0070	
Fire and other damage to property insurance and proportional reinsurance	R0080	21
General liability insurance and proportional reinsurance	R0090	132,804
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	
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**

	R0200	C0040
MCR <sub>L</sub> Result		1,325

**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	63,107
Total capital at risk for all life (re)insurance obligations	R0250	

**Overall MCR calculation**

	R0300	C0070
Linear MCR		15,075
SCR	R0310	64,328
MCR cap	R0320	28,948
MCR floor	R0330	16,082
Combined MCR	R0340	16,082
Absolute floor of the MCR	R0350	4,000
<b>Minimum Capital Requirement</b>	<b>R0400</b>	<b>16,082</b>