SOLVENCY AND FINANCIAL CONDITION REPORT 2019

AETNA HEALTH INSURANCE COMPANY OF EUROPE DAC

Alexandra House, 3, Ballsbridge Park, Ballsbridge Dublin 4

CONTENTS

EXECUTIVE SUMMARY

The current harmonised European Union regulatory regime for insurance companies, known as Solvency II, came into force with effect from 1 January 2016. This report is the first Solvency and Financial Condition Report ("**SFCR**") that Aetna Health Insurance Company of Europe DAC ("**AHICE**" or "**the Company**") has been required to publish under the Solvency II regime having been authorised by the Central Bank of Ireland under the European Union (Insurance and Reinsurance Regulations 2015) to undertake non-life insurance from 1 January 2019.

This report covers the following in relation to the Company during the reporting period 1 January 2019 to 31 December 2019 (the "**Reporting Period**"): its Business and Performance, its System of Governance, its Risk Profile, its Valuation for Solvency Purposes and its Capital Management. The Company reports its financial results in United States Dollars ("**USD**" or "**$**") and the figures stated herein are in Euro with USD equivalent for ease of reconciliation. There are no prior year comparatives as this is the first SFCR.

AHICE Business
The Company is an Irish authorised and regulated insurance company which forms part of the Aetna International division ("**Aetna International**") of the CVS Health Corporation Group of companies ("**CVS Group**").

The Company supports the Aetna International strategy to provide international private medical insurance (**"IPMI"**) contracts to individuals and groups throughout in Europe on a direct basis.

Currently the Company has no business on risk. European policies are underwritten by the Company's sister UK company, Aetna Insurance Company Limited.

With the departure of the UK from the EU on 31st January 2020, the migration of these policies to the Company will commence before the end of the transition period on 31st December 2020. Previously, the Company underwrote IPMI business but went into run-off in 2015. It continues to manage and settle the remaining claims from this book of business.

Business Performance
The earned revenue for the year was €nil as the Company underwrote no policies and had no business on risk. Net operating costs were €1,116k, an increase of €503k. Costs increased year-on-year due to FX loss €189k (2018: Gain €89k), some one-off costs associated with preparation for Brexit and some marginal increases in staffing.

The Solvency II technical provisions were €461k as the Company continued to run-off its old book of business.

Capital Management
The Company currently uses the Solvency II Standard Formula to calculate its solvency capital requirement. The Company has a mono-line product with contracts previously renewable on an annual basis. The Company also reviews its capital requirements against capital models from

rating agencies and its Board of Directors is satisfied that the Solvency II Standard Formula is, and remains, the most appropriate method for determining its solvency requirements.

The Company's regulatory Minimum Capital Requirement is €2,500k, which is higher than the Solvency Capital Requirement ("SCR") calculated under the Solvency II Standard Formula at 31st December 2019 of €2,099k. The Company has €14,432k of eligible Own Funds to meet the minimum Solvency Capital Requirement of €2,500k, providing a minimum solvency surplus of €11,932k and a solvency ratio of 577%. As the Company has no business on risk, the SCR is lower than the MCR.

Solvency Position as at 31 December	2019 €'000	2019 $'000
Eligible Own Funds to meet SCR	14,432	16,060
Solvency Capital Requirement (SCR)	2,099	2,335
Surplus	12,333	13,725
Solvency Ratio	**688%**	**688%**
Minimum Capital Requirement (MCR)	2,500	2,782
Eligible Own funds as a percentage of MCR	**577%**	**577%**

The Board is satisfied with the capital management process in place to ensure the Company meets its regulatory capital requirements and rating agency expectations and that it continues to do so as it starts to write business.

System of Governance

The Board of directors of the Company ("**Board**") has overall responsibility for ensuring that the Company has an effective system of governance. It is responsible for overseeing the conduct of the Company's business and supervising the executive team which is responsible for its day-to-day management. The Board manages its affairs in accordance with the constitution of the Company, its terms of reference and the legal & regulatory framework in which the Company operates. The Board confirmed delegation to two sub-committees at the start of the Reporting Period, an Audit Committee and a Risk Committee, both of which were convened and operated in accordance with their respective terms of reference.

The Company operates a three lines of defence internal control system with the business acting as the first line of defence (owning/managing risks and implementing controls); compliance and risk management as the second line (monitor and challenge the first line controls); and internal audit as the third line of defence (providing independent assurance to the Board on the effectiveness of the Company's governance, risk management, and internal controls).

Risk Management

The Company's risk management system is fully integrated into the strategic planning and annual business plans approved by the Board. The Own Risk & Solvency Assessment process provides the Board with updates on the Company's risk profile and assists it to capital plan over a three-year horizon. A risk scorecard is used to report on risk tolerances and provide the baseline for risk scenario testing.

Covid-19

The Company continues to actively monitor the impact of the COVID-19 virus and has implemented a policy for staff to work at home and these arrangements were tested before the policy was implemented. The Company has reviewed its underwriting practices to ensure all risks will be accepted in accordance with its underwriting risk appetite. The Company has considered the potential impact to claims costs but does not anticipate any material impact to the Solvency surplus at this time. There may be some macro-economic impact for the Company's customers and the Company will continue to regularly assess any potential impact to expected business growth and liquidity.

A. BUSINESS PERFORMANCE

A.1 Business

Company Details

Aetna Health Insurance Company of Europe DAC (hereinafter referred to as "**AHICE**" or the "**Company**") is a private company limited by shares which is incorporated in Ireland with company number 448763. Its registered address and principal place of business is Alexandra House, The Sweepstakes, 3 Ballsbridge Park, Ballsbridge, Dublin D04 C7H2.

Regulators

The Company is an Irish authorised insurance company providing international private medical insurance for individuals and groups. It is authorised by the Central Bank of Ireland ("CBI") with firm reference number C47511.

The contact details for the CBI can be found on their website:

https://www.centralbank.ie/

External Auditors

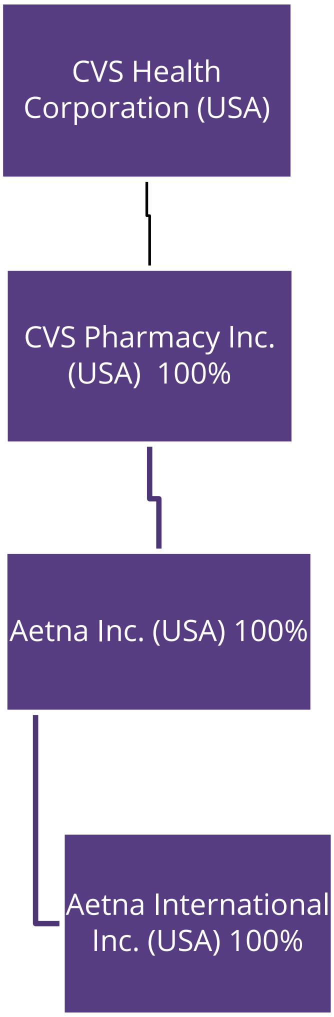
The Company's external auditor is EY Chartered Accountants, Harcourt Centre, Harcourt street Dublin 2 D02 YA40.

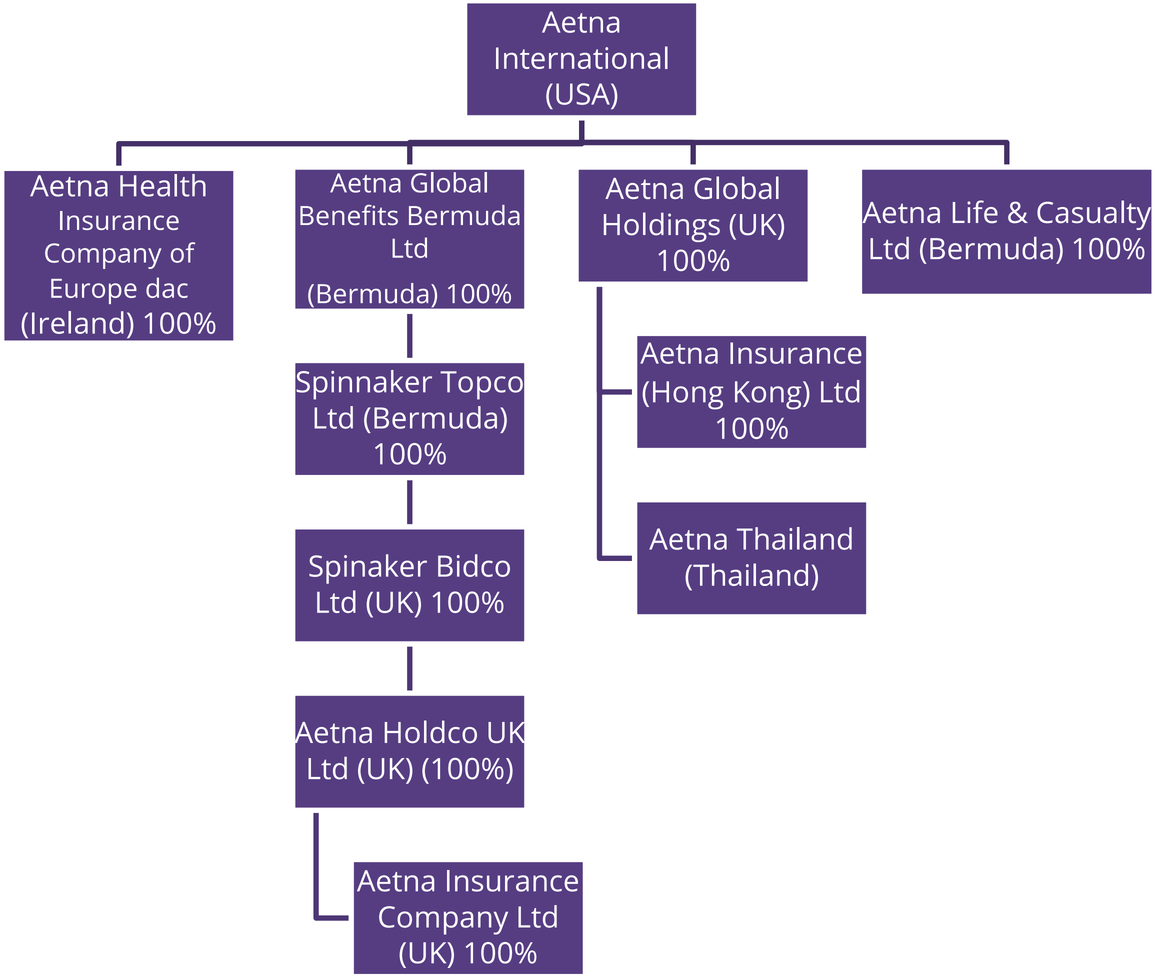
Legal Structure & Qualifying Holdings

The Company forms part of the Aetna International division of the Aetna Group which sits under CVS Health Corporation, a company incorporated in Delaware (USA).

A simplified group structure diagram is included on the next page which shows the holders of qualifying holdings in the Company.

Legal Entity Organization Chart
As at 31 December 2019 (extract)




Aetna International (USA)
Aetna Health Insurance Company of Europe dac (Ireland) 100%
Aetna Global Benefits Bermuda Ltd (Bermuda) 100%
Aetna Global Holdings (UK) 100%
Aetna Life & Casualty Ltd (Bermuda) 100%
Spinnaker Topco Ltd (Bermuda) 100%
Spinaker Bidco Ltd (UK) 100%
Aetna Holdco UK Ltd (UK) (100%)
Aetna Insurance Company Ltd (UK) 100%
Aetna Insurance (Hong Kong) Ltd 100%
Aetna Thailand (Thailand)

Products
All IPMI plans for sale by the Company will be short term in nature and renewable by invitation on an annual basis. There are two types of pricing structure:

Community rated
Community rated products include a pricing structure for a single population, with different price points depending on age and location. These will typically be purchased by individuals and small employer sponsored groups.

Experience rated
Experience rated products are offered to larger employer sponsored groups (100 + employees), where a target claims fund is set by reference to the historical claims experience. The claims fund for each experience rated group is reviewed on an annual basis.

The plan designs include a common architecture and structure for benefit tables, which facilitate the performance of claims analytics across the entire Aetna International book of business. The cost of medical treatments can be assessed and compared across the multiple locations, with the Company approving annual premium increases to cover medical cost inflation for the Company's products and/or to correct the Company's claims exposure for experience rated groups. Premium adjustments are calculated and are effective from the date any changes are made to the number of employees or family members covered under the annual policies.

Business and significant events in the Reporting Period

The Company supports the Aetna International strategy to provide international private medical insurance contracts to individuals and groups throughout Europe. It was authorised by the Central Bank of Ireland under the European Union (Insurance and Reinsurance Regulations 2015) to undertake non-life insurance effective from 1 January 2019. These passporting rights ensure that there is no impact to European policyholders currently insured by its UK sister company, Aetna Insurance Company Limited as a result of the UK's departure from the European Union in 2020.

The Company is sufficiently capitalised for the planned future growth, whilst absorbing the additional costs of investment in infrastructure and staffing required to write business.

A.2 Underwriting Performance

The Company has a single product, international private medical insurance. It is positioned to support the Aetna International strategy to provide international private medical insurance to employer sponsored groups and individuals in multiple locations.

There was no new business accepted by the Company in 2019. The Company is expected to commence writing new business before the end of the Brexit transition period, 31st December 2020.

The following table summarises the underwriting result for the year ended 31 December 2019.

Underwriting result	2019 €'000	2019 $'000
Net Written Premiums	-	-
Earned Revenue	-	-
Net Incurred Claims Costs	172	193
Operating expenses	-1,191	-1,333
Underwriting Result	**-1,019**	**-1,140**

The Company does not report its results by business segment in the financial statements and shows the total underwriting result for the single product line in the profit and loss account. The notes to the financial statements include additional information on premiums, which is shown in the table below:

Gross Written Premiums	EU €'000	EU $'000
2019	-	-

A.3 Investment Performance

All assets are invested in a manner that ensures the security, quality, liquidity and profitability of the portfolio as a whole. The Company maintains assets to match its policyholder liabilities at all times. The Board has outsourced the management of its investments to the CVS Group Treasurer which manages its investments in accordance with the Board approved investment risk parameters and liquidity requirements. This places emphasis on low risk (minimum rating BBB) and highly liquid assets. The Board has approved a target 0%-100% mix for invested assets in government bonds and commercial paper or corporate bonds with minimum credit rating of BBB, and the weighting of the invested assets in commercial paper and corporate bonds is 100%.

The assets held by the Company in its investment portfolio as at 31 December 2019 are listed in the table below:

Financial Investments	2019 €'000	2019 $'000
Cash on demand	9,049	10,070
Commercial paper	6,424	7,149
Total	**15,473**	**17,219**

The value of assets under management is affected by asset and currency performance. Investment income comprises interest, realised gains and losses on investment and unrealised gains and losses. Movements are recognised in the profit and loss account in the period in which they arise. Interest is accounted for on a time proportion basis using the effective interest method.

The table below provides an overview of the income and expense arising from the Company's investment assets:

Investment return – Bonds	2019 €'000	2019 $'000
Interest Income	150	168
Net (losses)/gains on realisation of investments	13	14
Investment return – Bonds	**163**	**182**

The investment return reflects the conservative strategy adopted by the Board and the low yield reflects the current interest rate environment. The income on the invested assets increased due to an improvement in coupon rates.

The cash on deposit is placed on a very low yield basis, allowing for cash to be withdrawn on demand.

Other assets and liabilities held in currencies other than the reporting currency, USD, are subject to foreign currency revaluation changes when valued in the reporting currency. The foreign currency unrealised gains/losses are included in the total investment return and the loss in 2019 was mainly attributable to the weakness in Sterling.

The total financial income is shown in the table below:

Total Financial Income Return	2019 €'000	2019 $'000
Bonds	163	182
Cash	0	0
Other assets/liabilities – unrealised gains/(losses) on investments	2	3
Total Financial Income Return	**165**	**185**

A.4 Performance of Other Activities

The Company's only activities during the Reporting Period have been insurance and related activities.

Operating costs of the Company include administration expenses directly incurred by the Company, including audit, other professional fees and banking charges.

The table below provides an overview of these costs for the Reporting Period.

Administration Costs	2019 €'000	2019 $'000
Administration costs - insurance business	1,191	1,333
Other administration income/charges	-75	-84
Total Costs	**1,116**	**1,249**

No dividends were paid during the Reporting Period which is consistent with the prior year.

A.5 Any other information

There is no other material information to report in relation to the Company's business and performance during the Reporting Period (save as otherwise covered elsewhere in this report).

B. SYSTEM OF GOVERNANCE

B.1 General Information on the System of Governance

- ***<u>The Board, its sub-committees and executive management</u>***

The Board has overall responsibility for ensuring that it has an effective system of governance. It is responsible for overseeing the conduct of the Company's business and supervising the executive team which is responsible for its day-to-day management. The Board manages its affairs in accordance with the constitution of the Company, its terms of reference and the legal & regulatory framework in which the Company operates. The Board was comprised of five directors as at 31st December 2019: three non-executive directors and two executive directors, as well as the company secretary.

The Board has delegated certain of its responsibilities directly to the executive management team and its sub-committees. During the Reporting Period, there were two Board sub-committees with terms of reference which set out their roles and responsibilities:

- ***<u>Audit Committee</u>***

The committee has responsibility for the oversight of the Company's financial reporting process, its audit process, its system of internal controls, compliance with laws & regulations This committee is comprised of the full Board. The finance, compliance, and internal audit functions all provide quarterly updates on their activities to this committee.

- ***<u>Risk Committee</u>***

This committee was responsible during the Reporting Period for the management of all aspects of the Company's risk exposure (including determining risk appetite and tolerances within an appropriate risk framework. This committee was comprised of the full Board.

- ***<u>Executive Management Team</u>***

During the Reporting Period, the Company's executive management team was comprised of the Chief Executive Officer, the Chief Risk Officer and the Chief Finance Officer. They had overall management accountability for the day-to-day business of the Company and were responsible for reporting on such matters to the Board and its sub-committees.

EMEA Regional committees

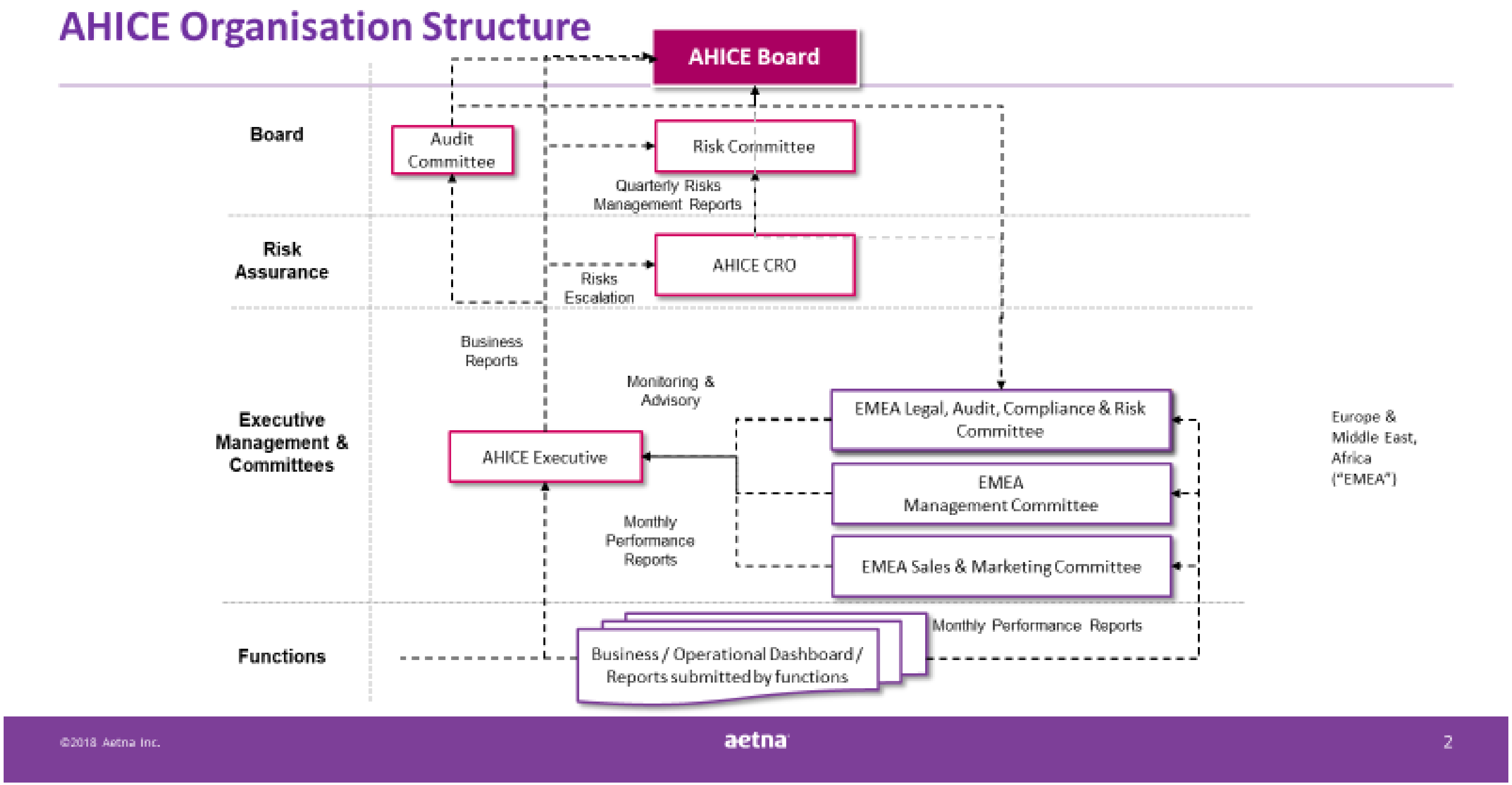
The executive management team are supported by three regional committees:

- Executive Committee;
- Sales & Marketing Committee; and
- Legal, Audit, Risk & Compliance Committee.

which facilitate process management, awareness and appropriate governance amongst the key functions of the business.

The Company's executive management team remain directly responsible for implementing any group strategy at the Company level and decisions with respect to how the Company should conduct its Irish regulated business.

An overview of the key functions of the Company and its key function holders (including their respective Company reporting lines) is shown in the diagram on the next page.


AHICE Organisation Structure
AHICE Board
Board
Audit Committee
Risk Committee
Quarterly Risks Management Reports
Risk Assurance
AHICE CRO
Risks Escalation
Business Reports
Monitoring & Advisory
Executive Management & Committees
AHICE Executive
EMEA Legal, Audit, Compliance & Risk Committee
EMEA Management Committee
EMEA Sales & Marketing Committee
Europe & Middle East, Africa ("EMEA")
Monthly Performance Reports
Functions
Business / Operational Dashboard / Reports submitted by functions
Monthly Performance Reports
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The following changes to the composition of the directors of the Board occurred during the Reporting Period:

- David Kingston, Walker Rainey and David Healy resigned as directors of the Company on 31 December 2019.
- Laurent De Veyrac was appointed as CEO and Director on 9 March 2019.
- John Wardrop and Brian Neilan were appointed as independent non-executive directors on 10 January 2019 and 1 April 2019 respectively.

Remuneration policy and practices

The Company has a remuneration policy for all employees, which includes a mixture of fixed pay and bonus incentives.

The Human Resource function completes market research for employees to set bench-marked pay ranges for fixed pay. The market research also reviews additional market-based benefits which can be added to the basic compensation package.

The Company offers defined contribution pension for employees and the contribution rates are set based on market research. The bonus incentives are linked to personal performance and the performance of the CVS Group. The performance of the Company is included in the total performance calculations for determining bonus funding approved by the CVS Group and there are no incentives linked specifically to the Company's performance.

The Chairman and Chief Executive Officer of the Company meet on an annual basis to review the remuneration policy to ensure it is appropriate for the Company.

Assessment of Corporate Governance Structure

The governance structure has been designed to ensure that management can provide the necessary oversight of the business and make decisions, whilst also supporting the responsibilities of the Board. The Board has clearly defined responsibilities and delegated authorities to its sub-committees.

The CVS Group sets the broad business strategy for the Company. The Board reviews the Company's strategy and annual business plan, which is prepared by the executive management team and is aligned with the broad strategic direction from the CVS Group.

The Board scrutinises the strategy and business to assess its risk and benefits and determine if its implementation is in accordance with:

- the Company's risk appetite.
- the Company's short term and long-term strategy.
- the Company's legal and regulatory responsibilities; and
- the fair treatment of the Company's policyholders.

The governance structure provides a mechanism for the Company to anticipate and respond to potential changes in the business environment or its risk profile in an appropriate amount of time. The risk management structure integrates risk assessment into the strategic and business planning cycles, which enables the Company to maintain a manageable risk profile.

B.2 Fit and proper requirements

The Company has a documented procedure for ensuring that all senior management functions ("**Pre-Approved Control Functions PCFs and Control Functions CFs**") are, and remain, fit and proper in accordance with Irish regulatory requirements.

In assessing whether a person is fit and proper to be a Key Function Holder, the Company considers the following regulatory prescribed criteria in relation to that person:

(a) personal characteristics (including being of good repute, honesty, integrity and financial soundness).

(b) the level of competence, knowledge & experience.

(c) qualifications and professional standards; and

(d) the training undertaken or to be undertaken by that person.

In relation to (a) and (b), the Company looks for evidence that the person has:

- appropriate qualifications.
- experience and knowledge in insurance and financial markets.
- an understanding of the Company's business strategy, business model; system of governance.
- an understanding of financial and actuarial analysis (to the extent applicable).
- knowledge of the legal and regulatory framework and requirements applicable to the Company and its business; and
- the ability to adequately support the sound and prudent management of the Company.

The above criteria are assessed prior to the person's appointment as a PCF/CF through self-assessment questionnaires, interviews with the Human Resources team senior management and third-party background checks (covering employment references, criminal records checks, credit checks and academic/professional body checks), as appropriate to the function concerned.

Once appointed, the person is subject to periodic fitness and propriety checks by the Company. This fit and proper process and the appointment of PCF/CF is overseen by the Board.

In addition to the above, the Company has a robust recruitment process and performs appropriate employment checks on all other employees operating within the key functions of the Company's business. This is overseen by the Chief Executive Officer in conjunction with the Human Resources team.

B.3 Risk Management System

B.3.1 Risk Management Function and System

The Board has delegated oversight of the risk management system to the Risk Committee. The Chief Risk Officer is responsible for discharging, managing, and the day-to-day oversight of, the Company's risk management function and reporting to the Risk Committee in respect of this. The risk management function is responsible for the implementation of the Company's risk management system.

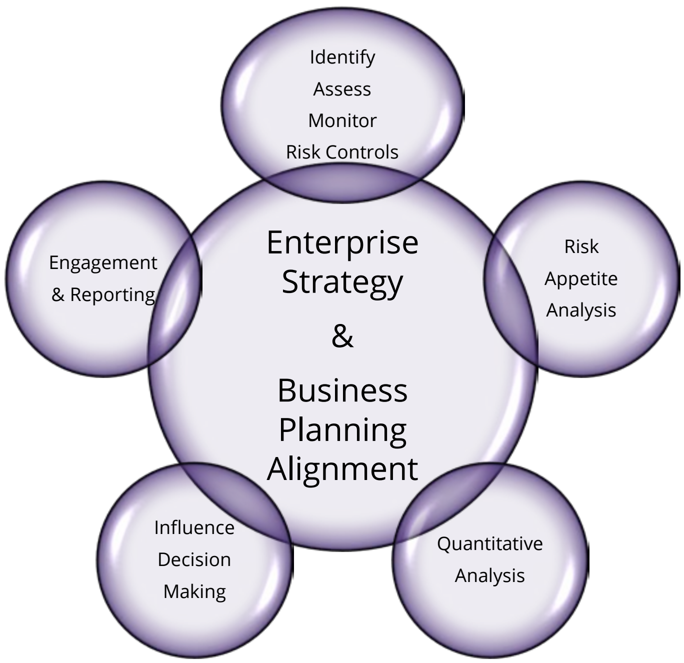
The Risk Committee has approved the implementation of a risk management system to identify, measure and track risk indicators for the Company. The risk management system includes a risk appetite statement, risk register, risk tolerances and a risk scorecard for monitoring performance against qualitative and quantitative tolerances.

John Wardrop, an independent non-executive director chairs the Risk Committee, which meets regularly to review business performance metrics, business developments and other material changes which could impact the risk profile of the business.

The CRO presents quarterly risk updates to the Risk Committee, which includes:

- executive summary of the business issues reviewed by the management risk committee.
- risk scorecard summary.
- risk tolerances summary.
- solvency capital summary; and
- an overview of the risk management process.

The Company's risk management ("**RM**") process can be summarised using the following diagram:



B.3.2 Own Risk Solvency Assessment ("ORSA")

Process

The ORSA is a forward-looking risk assessment of the Company's material risks in the context of its business strategy and risk appetite, in order to determine current and the future solvency needs of the business. The Company's ORSA process is governed by its ORSA policy, which describes the purpose, process and governance over the ORSA.

The Board is responsible for the Company's ORSA and ensuring that it is performed in accordance with the ORSA policy and applicable law and regulation.

The ORSA process is coordinated by the Chief Risk Officer. The objective of the ORSA process is to assess its capital adequacy in light of its assessment of its risks and the potential impacts of its risk environment and enable it to make strategic decisions.

The risk management reporting to the Risk Committee supports the objectives of the ORSA by presenting regular updates on the Company's risk profile. The risk scorecard is used to track emerging risk issues that impact the Company's ability to manage its solvency capital.

The key risk assurance functions which provide updates to the Risk Committee as part of the ORSA process are:

- the CRO manages the ORSA process and its outputs, which identifies the key risks; and
- the actuarial function which runs tests on the Company's balance sheet, for capital adequacy and produces the resultant output.

The Board reviews the report following completion of the ORSA process and considers the need for any management actions to be incorporated into the final ORSA report, such as:

- assessment of the appropriateness of the Solvency II Standard Formula for determining the Solvency Capital Requirements of the Company;
- review of the Company's solvency capital calculations and scenarios;
- decisions in relation to its capital;
- reassessment of the Company's risk profile and appetite;
- additional risk mitigation actions; and
- reassessment of the Company's investment strategy.

The results and conclusions contained in the final ORSA report and the Board's resultant actions and decisions, are communicated to all relevant staff, including outsourced control functions, once the report has been considered and approved by the Board.

Frequency

The ORSA process is repeated and an ORSA report prepared annually or earlier when certain material trigger events occur, as decided upon by the Company's Risk Committee in concert with the Board and in accordance with the ORSA policy.

Interaction of solvency and capital management with risk profile

The capital management process monitors the capital requirements for the Company on a quarterly basis. As part of this, the CRO prepares risk scorecard summaries, which include tolerances for monitoring the Own Funds available to meet the Company's Solvency Capital Requirement and Minimum Capital Requirement.

The solvency monitoring is reviewed under the capital management process so that any changes in business circumstances or its risk profile can be tracked for additional capital requirements.

The Company determined that the Solvency II Standard Formula would be used to calculate the required solvency capital and to assess the overall solvency needs. The Company administers a mono-line product with a short tail risk and the Solvency II Standard Formula is appropriate for the level of complexity in the Company's business. The AM Best capital model was also used to check capital requirements and the capital assessment under this model was slightly lower than the capital requirements under the Solvency II Standard Formula.

B.4 Internal Control System

B.4.1 Three Lines of defence

The Company operates a "three lines of defence" internal control system:

- ***First line – Business Controls***

The Board owns and manages the risks of the Company and has responsibility for the Company's compliance with the requirements associated with the legal and regulatory environment in which it operates. The Board has implemented systems and controls, including appropriate internal policies and procedures, to comply with such requirements and to manage risks and monitor these alongside the development of its business strategy.

The Chief Executive Officer has been delegated responsibility by the Board for management of compliance with business controls and is responsible for reporting on such matters to the Board and its sub-committees.

- ***Second line – Internal Control Functions***

The compliance and risk management functions form the second line of defence to ensure that the Company has an effective risk management control system. Further detail on the Company's compliance function is provided below.

- ***Third line - Internal Audit Function***

The internal audit function forms the final layer of the internal control system and is an independent and objective function which is ultimately responsible for providing the Board with assurance that the Company has effective internal controls. Further detail on the Company's internal audit function is provided in Section B5 below.

B.4.2 Compliance Function

The Compliance Function is responsible for:

- ***Compliance Risk Monitoring***

The Compliance Function identifies, assesses, monitors and reports to the Board (via the Audit Committee) on the Company's compliance risks (including the risk of it incurring legal and regulatory sanctions, significant financial loss, significant strategic or operational disruption, significant policyholder detriment or damage to reputation as a result of the Company's failure to comply with applicable laws and regulations). This includes reporting on any material non-compliance by the Company with such measures and/or any applicable law and regulation.

- ***Supporting the implementation of legal & regulatory changes and internal controls***

The Compliance Function assists the business with the implementation of controls to address changes in the legal and regulatory environment and manage compliance risk. This includes advising the Board on the Company's compliance with the rules and other laws, regulations and administrative provisions adopted in accordance with the Solvency II Directive.

- ***Regulatory reporting and correspondence***

The Compliance Function coordinates and oversees the preparation and filing of non-finance related regulatory reports, non-product filings and correspondence with the Company's regulators.

The Head of Compliance is responsible for discharging, managing and overseeing the Company's compliance function. He or his delegate reports to the Audit Committee on compliance matters on a quarterly basis – this includes details of any material compliance breaches and any corrective action undertaken in the previous reporting period.

The compliance function also provides updates on compliance activity at monthly Legal, Audit, Risk and Compliance management committee meetings, which are comprised of senior management and individuals from other key functions.

The Head of Compliance has a reporting line into the Chief Executive Officer in respect of day-to-day compliance matters and also an internal reporting line into a regional Director of Compliance, within the Aetna International business.

There is a compliance policy which is reviewed annually and approved by the Board. The Compliance Officer is responsible for this policy and ensuring that it is implemented. The Board ensures that the compliance function has the necessary access to all personnel (including third parties with whom the Company deals), systems and records in order that it can perform its role in full support and adherence of the compliance policy.

B.5 Internal Audit Function

The internal audit function of the Company is responsible for providing the Board with independent and objective assurance in respect of the Company's system of governance; in particular, it assists the Company in accomplishing its objectives by bringing a systematic and disciplined approach to evaluate and improve the effectiveness of the organisation's governance, risk management, internal control.

There is a dedicated internal audit team in the UK which has a primary focus on Aetna International's business and specifically covers the Company. This team forms part of the wider CVS Group internal audit function which is headed by the Head of Internal Audit for CVS Healthcare Group

The Company's Head of Internal Audit is primarily responsible for overseeing and discharging the Company's internal audit function with the support of the internal audit team.

The Company's Head of Internal Audit reports to the Company's Audit Committee on a quarterly basis. This reporting structure ensures that audit issues and action plans receive adequate consideration and effective action.

The Company's internal audit charter also provides a mechanism for the Chairman of the Audit Committee to engage directly with the head of the internal audit function, independent of the executive management.

The planning process includes management input, a review of emerging risks and professional auditor judgment. The internal audit charter for the Company also provides for the Audit Committee to request ad-hoc or specific internal audit reviews for the Company, if the Audit Committee deems this necessary. The Audit Committee approves the annual internal audit plan for the Company.

Results and conclusions of audit work are reviewed with operating and financial management directly responsible for the activity being evaluated and other management, as deemed appropriate.

The purpose of reviewing results is to reach an agreement as to the facts presented by the auditors and to obtain management action plans to address issues. Communications include the engagement's objectives and scope, as well as applicable conclusions, recommendations, and action plans.

Once an audit is completed and results are communicated, the internal audit function follow-up to ensure that management action plans ("**MAPs**") are effectively implemented. The status of all management action plans will be reported quarterly to the Company's senior management and Audit Committee, with specific details around any MAPs delayed past their due date.

B.6 Actuarial Function

The actuarial function is responsible for the following activities:

- co-ordination of the calculation of technical provisions. This consists of assessing the sufficiency of the provisions, assessing the uncertainty in the estimates and justifying the differences between successive periods;
- reviewing the appropriateness of the models and assumptions, considering the sufficiency and quality of data, and interpreting deviations of best estimates against experience. There is also a requirement to consider the verifiability of assumed management actions;
- providing opinions on underwriting policy and any reinsurance arrangements;
- contributing to the effective implementation of the risk management system of the Company. In particular:
    - in relation to the Solvency Capital Requirement ("**SCR**") and Minimum Capital Requirement ("**MCR**"), the Company's Chief Actuary reviews the output of the model used by the Company to calculate the SCR and MCR. Specifically, any perceived or possible inconsistencies or issues identified in the model results are raised; and
    - the Chief Actuary approves the preparation of the ORSA presented to the Risk Committee in conjunction with the risk management function.

The Chief Actuary is responsible for discharging, managing and overseeing the actuarial function. In addition to ad-hoc updates to the Board and Risk Committee (as may be required from time to time), the Chief Actuary is required to produce an annual report for the Board. This report covers all of the information necessary for the Board to form its own opinion on the adequacy of technical provisions and on the underwriting and reinsurance arrangements of the Company.

B.7 Outsourcing

The Company outsources and enters into outsourcing arrangements only where there is a sound commercial basis for doing so, and where the risk can be effectively managed. A due diligence process is undertaken prior to any final decision being made as to whether to outsource a material business activity. This addresses all material factors that would impact on the potential service provider's ability to perform the business activity.

The Company uses Group expertise to put in place some arrangements, see table below. The Group completes the initial due diligence for these external service providers and ensures all required subsidiary undertakings within the Group are covered under the sub-contract with external providers.

The Company's management ensure that the contracts comply with the Board approved outsourcing policy. The Company's management are responsible for the oversight of all outsourcing arrangements.

The Company has established an Outsourcing Policy setting out the requirements for identifying, justifying and implementing material outsourcing arrangements. This Policy has been adopted by the Company and covers the following:

- definition of outsourcing;
- risk assessment;
- Board and management responsibility;
- internal control procedures;
- due diligence;
- business continuity management;
- contractual agreements;
- management and control of the outsourcing relationship; and
- final approval.

The Company's outsourcing arrangements are subject to an annual review and a report with any findings from that review are presented to the Board. The following table details the critical or important operational functions the Company has outsourced together with the jurisdiction in which the providers of such functions or activities are located:

Service Provider	Service Outsourced	Jurisdiction	AHICE Outsourcing Oversight
Aetna Global Benefits (UK) Limited	Sales Management Operations (routine back office policy administration) Complaints Administration Actuarial Analysis Finance Operations Internal Audit reviews Legal support Information Technology and Infrastructure	United Kingdom	Chief Executive Officer/ Chief Finance Officer
Aetna Life Insurance Company ("ALIC")	Investment Management Treasury Management Information Technology Outsourcing sub-contracts (see below)	United States of America	Chief Finance Officer
HGS	Claims processing (back office)	India	Chief Executive Officer
Genpact	Call centre	Manila	Chief Executive Officer
Microsoft	Cloud services (Azure) for information systems, networking & disaster recover.	UK	Chief Risk Officer

B.8 Any other information

The Company has assessed its system of governance and has concluded that it effectively provides for the sound and prudent management of the business and that it is proportionate to the nature, scale and complexity of the operations of the Company.

There were no material changes to the system of governance during 2019 (save as those noted elsewhere in this report).

C. RISK PROFILE

Risk management objectives and risk policies overview

The Company is exposed to a variety of risks when undertaking its activities. The Board has policies in place to identify and manage the key risks in accordance with its risk appetite. The key risks that the Company is exposed to are as follows:

- underwriting (insurance) risk;
- market risk;
- credit risk;
- liquidity risk;
- operational risk; and
- regulatory risk and capital management

The following sections outline the Company's views on each of these risks and the measures and controls in place to manage them.

Premium Risk	**Reserve Risk**
Premium risk arises from the failure of pricing strategies. It encompasses the risk of loss due to the potential timing, severity and frequency of covered claims differing from the assumptions at the time the risk was underwritten and priced.	Reserve risk arises from failing to set sufficient cash reserves to cover the uncertainty surrounding the timing, frequency and severity of claims costs.
Catastrophe Risk	**Lapse Risk**
Catastrophe risk arises from the failure to manage risk aggregation or accumulation that may result in an increased exposure to catastrophe losses.	Lapse risk reflects the risk of loss, or of adverse change in the value of insurance liabilities, arising from the discontinuation of a policy.

C.1 Underwriting Risk

The Company did not write any business in the reporting period.

The key elements of the Company's insurance risk management framework are its underwriting risk, reserving risk, reinsurance risk and lapse risk.

Underwriting strategy

The Company's underwriting strategy is aligned with the Aetna International strategy to grow a balanced portfolio of international private medical insurance contracts with an appropriate spread of risk which will yield a targeted return on risk capital for its shareholders.

The Company reviews the underwriting strategy established during the annual business planning process, when the upcoming underwriting year's target portfolio is structured. The strategy, and associated business targets, is communicated to business managers and appropriate underwriting authorities and controls implemented to ensure the desired risk profile is achieved. Adherence to underwriting guidelines and authorities is achieved through monitoring and review controls established by the executive management team.

Further review of the portfolio, its composition and yield, is formally undertaken by the Board. The short tail nature of international private medical insurance results in the ultimate expected losses associated with a given insurance contract, or portfolio of contracts, being known within a relatively short timeframe after conclusion of the associated contract indemnity term.

Reserving risk

To manage reserving risk and ultimate reserves risk, management employs a number of techniques to monitor premium and claims development patterns. An external independent actuary also performs an annual review of the claim's methodology.

The objective of the Company's reserving policy is to produce accurate and reliable estimates that are consistent over time.

Reinsurance strategy

The Company has reviewed a reinsurance programme that is designed to reduce the impact of adverse loss experience on equity to a tolerable level as part of its risk management process. The Company will be exposed to the risk of adverse loss experience on a frequency and severity basis and structures its reinsurance programme to appropriately respond to such risks in both individual and catastrophic loss scenarios.

In addition, the Company will be exposed to the risk that claims provisions do not meet the ultimate cost of settling claims through claims management risk and reserving risk.

Lapse risk

The Company will monitor the mix of individual risk business (where premium refunds may apply for early cancellation) and group risks (where there is likely to be some claims activity resulting in no premium refund). The majority of the business to be underwritten is group risk business and therefore the potential losses arising from early cancellations are not material.

Material changes to the measures used to assess underwriting risk

There were no material changes to the measures used to assess underwriting risk in the period.

C.2 Market Risk

Market risk is the risk that changes in market prices, such as interest rate, foreign exchange rates and prices will affect the value of the Company's assets, the amount of its liabilities and/or the Company's income.

The Board approved investments parameters recognise the "prudent person principle" in relation to the management of assets held by the Company, including selection criteria to ensure the assets selected meet clearly identifiable, easily tradable, meet minimum credit rating criteria and that the market valuation can easily be verified by an independent party.

The components of the Company's market risk are shown below.

Market Risk Component	Description
Spread risk	The potential financial loss due to the increase in spread that an asset trades at relative to comparable government bonds.
Currency risk	The potential financial loss due from the change in currency exchange rates causing an adverse change in value of the liabilities compared to assets held.
Interest rate risk	The potential financial loss due to a reduction in value of the investment portfolio due to a change in interest rates.

Spread risk mitigation

There are investment parameters approved by the Board, which focus on high quality debt instruments. The investment assets include a bias towards highly liquid, sovereign government bonds. The Board reviews performance against the investment parameters and their effectiveness on a quarterly basis and the investment parameters are reviewed and approved by the Board annually. The current investment parameters are an effective control against a market change in spread risk.

Currency risk mitigation

Management reviews the matching of assets and liabilities regularly and reports to the Board (who discusses the effectiveness of the mitigation) on a quarterly basis. There are no material market currency risks which require action.

Interest rate risk mitigation

Interest rate risk is the risk that the unfavourable movements in interest rates could adversely impact on the capital values of the Company's financial assets and liabilities.

The investment strategy approved by the Board is focused on high quality, short duration debt instruments.

When the Company starts to transact business with insureds, these will be domiciled in countries within the EU but outside of the Ireland. These insurance contracts will principally be denominated in euro and therefore the Company will change its functional currency from USD to euro in 2020.

The Company invests in short term government bonds, corporate bonds and commercial paper. Since the funds are short term, they are not subject to large movements from changes in interest rates. The Company does not hold any external borrowings as part of its financial liabilities profile at the balance sheet date so is not exposed to any movement in market interest rates.

The Board reviews performance against the investment strategy and their effectiveness on a quarterly basis and the investment strategy is reviewed and approved by the Board annually. The quarterly monitoring of asset duration is effective for mitigating against changes in interest rates.

Any interest rate risk arising on the Company is considered to be minimal.

Material changes to the measures used to assess market risk

There are no material changes to the measures used to assess market risk as listed during 2019.

C.3 Credit Risk

The Company defines credit risk as the risk of financial loss to the Company should a counterparty fail to meet its contractual obligations.

The Company only holds investment and cash balances in accordance with the credit ratings specified in the Board approved investment parameters (which as noted earlier recognise the "prudent person principle") to mitigate the risk of financial loss from counterparty default. The Company has used credit quality steps based on ratings from its nominated External Credit Assessment Institutions ("**ECAIs**") when calculating its counterparty default risk.

The Company's investments and cash ratings are represented in the table below:

Asset Class	Credit Rating	ECAI	% Held	Solvency II Credit Quality Step
Cash	AA	Moody	58%	1
Cash	A	Moody	42%	1

An update of the Company's investments and cash ratings are presented to the Board on a quarterly basis which monitors the effectiveness of, and compliance with, the investment parameters. The risk appetite for the range of credit ratings allowable for investments and the quarterly monitoring is effective in managing the default risk from counterparties. There were no material changes in the mix of credit ratings attaching to the Company's assets during the Reporting Period.

C.4 Liquidity Risk

Liquidity risk is the risk that the Company does not have timely access to sufficient cash reserves in order to satisfy its obligations as they fall due.

The Company's principal obligations relate to the settlement of claims arising on its insurance contracts. The nature of the Company's insurance activities is such that the profile of claims incurred follows a high frequency, low severity profile.

Such a profile lends itself more readily to cash requirement forecasting than low frequency high severity insurance lines of business such as property catastrophe, thereby reducing inherent liquidity risk.

The Company's finance function forecasts cash requirements on a monthly basis, managing its available cash resources accordingly. The forecasting process takes into account the nature and duration of technical provisions in accordance with the "prudent person principle" under Solvency II rules.

The level of cash retained versus cash released for investment is monitored and reported to the Board. The Board sets minimum cash balances to be maintained, depending on the volatility expected in the cash flow forecasts.

The table below provides details of the liquidity and duration of Company's financial assets as at 31 December 2019:

Financial Investments	2019 €'000	2019 %	2019 $'000	2019 %
Cash on demand	9,049	58%	10,070	58%
Commercial paper (within 1 month)	6,424	42%	7,149	42%
Total	**15,474**	**100%**	**17,219**	**100%**

Change in measures used to assess liquidity requirements

The calculation of the technical provisions includes anticipated margin on the unwinding of future cash flows.

C.5 Operational Risk

Operational risk is the risk of direct or indirect loss arising from a wide variety of causes associated with the Company's processes, personnel, technology and infrastructure, and from external factors other than credit, market and liquidity risks, such as those arising from legal and regulatory requirements and generally accepted standards of corporate behaviour.

Operational risks arise from all of the Company's operations, including activities outsourced to related parties within the CVS Group. The Company's objective is to manage operational risk so as to balance the avoidance of financial losses and damage to the Company's reputation with overall cost effectiveness and to avoid control procedures that restrict initiative and creativity.

The primary responsibility for the development and implementation of controls to address operational risk is assigned to senior management and is overseen by the Board. Compliance with the Company's standards is supported by a programme of periodic reviews undertaken by the internal audit function.

The results of internal audit reviews are discussed with management, with summaries submitted to the Audit Committee.

The Company also considers different stress scenarios, including failure of IT operating platforms, loss of key talent and the loss of Dublin office. There are documented controls included in the Company ORSA which mitigate against the loss of operations for these key risks. There are documented procedures for the key controls and monitoring processes

Under the reverse stress tests documented in the ORSA, the most extreme and unlikely event to impact the operations of the Company would be if the CVS Group was unable to continue operations. A secondary event which could disrupt operations would be a major incident at the Dublin office. However, the disruption caused by any such event would be reduced by activating the business continuity plan, which is regularly tested and documented.

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

C.6 Stress Testing and Sensitivities

The Company has performed stress and scenario testing of the material risks to which it is exposed. The Company has sufficient Own Funds to meet its SCR and MCR. There are no realistic stress scenarios that could bring the Company's Own Funds below its SCR or MCR and the Company is more than adequately capitalised to absorb losses.

The Company also completes reverse stress tests on an annual basis to examine the conditions that would render the Company's business model unviable.

The table below provides summary details of the stress and scenario testing completed:

Type of Test	Risks Covered	Timeline
Stress & Scenario Testing:		
Business Planning	Material risks over 1-year planning period	Annually
	Material risks over 3-year planning period	Annually
Strategic Planning	All risks	Annually
Risk specific	Liquidity risks	Monthly
	Underwriting risks	Monthly
	Market risks	Quarterly
Reverse Stress Testing:		
Business Planning	Solvency & Capital	Annually
	Liquidity	Annually
Strategic	Strategic & reputational	Annually

In order to monitor the severity and impact of material risks on the Company, the stress tests detailed in the table below were included as part of the Company's ORSA:

		SCR €'000	Projected Own Funds €'000	Solvency Coverage %	Change in SCR (from base) €'000	Change in: Surplus Own Funds (from base) €'000	Management Actions to mitigate stress scenarios
Base	**2020 Base position** • SCR €2,099 • MCR €2,500	**2,500**	**14,432**	**577%**		**0**	
Underwriting Risk	Unexpected increases to medical claims volumes and/or medical claims costs results in 3% deterioration to the loss ratio, impacting own funds and the Health Underwriting Risk SCR	2,500	12,432	497%	-	(2,000)	Robust and frequent monitoring: *- monitoring of medical costs trend* *- monitor expected levels of claims volumes* *- quarterly forecasts of financials including renewal and new business volumes, premium rate increases and claims experience* *- regular reviews of pricing strategy*
Market Risk	Risk of corporate bond default. Investment risk appetite allows for investment in corporate bonds, with a target mix of 95% for assets credit rating no lower than A-. Uncertain economic conditions relating to COVID-19 could increase the risk of a default, but maximum exposure in this scenario estimated at €2m	2,500	12,432	497%	-	(2,000)	Investment portfolio reviewed on a quarterly basis with management and the Board. Risk tolerances also set for credit rating exposure
Credit Risk	Delays in receipt of premiums, increasing the total aged premiums receivable by €2m (with the entire increase amounts allocated to amounts owed for over 3 months) increases Counterparty Default Risk	3,599	14,432	401%	1,099	-	Existing Credit controls operate to mitigate risk: *- monthly credit control reviews* *- escalation of management reviews for larger debts* *- engagement with customers*

Liquidity Risk	Liquidity stress requires AHICE to convert €2m of financial investments to cash, reducing interest rate and spread risk and increasing counterparty default risk	2,500	14,432	577%	-	-	Existing credit controls maintained to ensure premiums collection cycle in line with liquidity management forecasts SCR lower than MCR, so any reduction to SCR will not impact base requirement for 2020
Total	**Aggregate of Stress Scenarios**	**3,599**	**10,432**	**290%**	**1,099**	**(4,000)**	**Own Funds surplus is sufficient to maintain solvency margin**

The test results were performed using business planning data from the 2020 business plan originally prepared in quarter 4 2019. The assumptions in the 2020 business plan and the actual results shown in Sections D & E below have been defined as the base position for the stress testing.

In addition to the stress tests completed above, the Company also identified circumstances that could potentially render its business model unviable, including the effects of the failure of the parent company and the impact of significant operational failures or regulatory interventions on the business that could result in business failure. There were no results creating additional actions for the Company.

C.7 Regulatory risk and capital management

Regulatory risk is the risk that the Company breaches the requirements of local regulatory bodies, most notably the Central Bank of Ireland. The Company mitigates this risk through the effective operation of defined governance structures and effective capital management. The Company is required to hold sufficient capital to comply with the capital requirements under the Solvency II directive. The Company has complied with these capital requirements throughout the period. Management also carries out its own assessment of the level of capital resources it regards as appropriate in excess of these regulatory minima.

C.8 Other Material Risks

There are no other material risks to report in respect of the Reporting Period.

C.9 Other material information

The information presented in Section C explains the Company's risk profile. There is no other additional information to disclose.

D. VALUATION FOR SOLVENCY PURPOSES

The following table analyses the Company's assets and liabilities on 31st December 2019, showing the movement between the IFRS valuation and the Solvency II valuation.

Net Assets	FRS	Valuation & Reclassification Adjustments	Solvency II	Solvency II
	2019	2019	2019	2019
	€'000	€'000	€'000	$'000
Insurance receivables	0	0	0	0
Trade receivables	83	0	83	93
Financial Assets - Cash and cash equivalents	15,474	0	15,474	17,219
Total Assets	15,558	0	15,558	17,312
Technical Provisions	481	-20	461	512
Insurance Balances payable	6	0	6	7
Trade and other payables	136	0	136	152
Other Liabilities	470	0	470	523
Risk Margin	-	52	52	58
Total Liabilities	1,094	32	1,125	1,252
Net Assets/Own Funds	**14,464**	**-32**	**14,432**	**16,060**

D.1 Assets

Assets are valued at the amounts for which they could be exchanged between knowledgeable, willing parties in an arm's length transaction. The classes of assets stated in the economic balance sheet are valued individually. The Company closely monitors the valuation of assets and considers if there are any changes in circumstances which might require a change in the valuation applied.

The Company also applies the materiality principle, applying judgements to estimates and estimation methods where necessary. The principles that have been applied to the valuation of the financial assets is detailed further below:

Note 1: Deferred Tax

Deferred tax is estimated using the balance sheet method, providing for temporary differences between the carrying amounts of assets and liabilities for financial reporting purposes and the amounts used for taxation purposes.

A deferred tax asset is not recognised in the 2019 Solvency II balance sheet as there is insufficient evidence at the reporting date in relation to the timing of the future economic benefits for the utilisation of the cumulative tax losses. This position will be reviewed when profits are reported in future periods.

Once the Company commences writing business, the underwriting margins are expected to exceed the costs attributable to running the business in future periods and to generate future profits.

Note 2 Financial Investments

Financial Investments	2019 €'000	2019 %	2019 $'000	2019 %
Cash on demand	9,049	58%	10,070	58%
Commercial paper (within 1 month)	6,424	42%	7,149	42%
Total	**15,474**	**100%**	**17,219**	**100%**

The financial assets include investments in corporate bonds and commercial paper in accordance with the Board approved investment parameters. The assets are included at fair value using a mark-to-market approach, based on readily available prices that are sourced independently. The investments are valued under the Level 1 (84% of total value of financial investments) and the Level 2 tier of fair value hierarchy, where there are quoted prices in active markets for the same assets. Accrued income included in trade receivables under FRS rules, is added to the market value of the investment bonds under Solvency II valuation rules. There has been no adjustment to the valuation of the financial investments in the Company's financial statements for the Reporting Period and the valuation is based on quoted market prices at the valuation date.

The Board reviews the management of the investment portfolio. There are investment parameters approved by the Board for the investment manager, which include parameters for monitoring the credit ratings applied to assets in the investment portfolio. Two or more credit ratings will be checked, if available and the lower of the two applied or the second from lowest if more than two credit ratings available. The valuation of the assets includes details of credit rating selected by the investment manager for each asset held.

Cash held on fixed term deposit is valued at fair value, representing the valuation of the cash that could be exchanged between two knowledgeable parties in an arm's length transaction. The deposits are renewed monthly for fixed terms. Consequently, there is less than 12 months to maturity and the value of the deposit has not been discounted. These fixed term cash deposits are reclassified as financial assets in the Solvency II balance sheet.

Note 3: Reinsurance receivables

Reinsurance recoveries on claims already paid by the Company (but for which payment is yet to be received from the reinsurer), are treated as "reinsurance receivables". There are procedures and controls in place to ensure the accurate recording of claims paid and recorded for recovery under the excess of loss reinsurance treaty. Summary reports are provided and discussed with the related party reinsurer. Balances receivable are settled on a regular basis. There are no amounts due at the reporting date.

Note 4: Reinsurance recoverable

For this approach, the actuarial reserving director has reviewed the events that create a recoverable cash flow and the amounts included in the valuation are consistent with the terms of the reinsurance agreement.

It is assumed that reinsurance recoveries on incurred but not reported ("**IBNR**") claims are only relevant for the events not in data ("**ENID**") allowance.

The reinsurance recoverable on IBNR is estimated at 17.5% of the ENID amount. This was parameterized by an independent consultancy and validated by considering that the result is similar to that of a small number of large claims that could reasonably be expected to relate to the claims reserve.

Reinsurance recoveries on the premium reserve are estimated as a percentage of the total premium provision before expenses and other non-claims cash flows (such as premiums receivable), based on an historical analysis of claims.

A default allowance of 1.23% is applied based on average credit spreads based on Standard & Poor's default rates from their 2012 corporate bond study for issuers of a similar credit rating to the Company's reinsurer. This adjustment is immaterial but included for completeness.

Reinsurance recoveries were assumed to occur at the same time as the underlying claim payments to members. Due to the small lag between these payments and receipt of cash from the reinsurer (Aetna Life & Casualty (Bermuda) Limited, another CVS Group insurance company), this was considered immaterial (total recoverable €0.1k, and assuming a discounting lag of 1 year at 1% yield would result in no change in value).

Note 5: Other Trade receivables

The receivables (trade, not insurance balances) relate to receivables from related party entities within the Group, which are due within 1 year and carrying value are taken to approximate fair values under Solvency II valuation rules. The value stated represents the amount that could be exchanged between two knowledgeable and willing parties in an arm's length transaction.

There was a significant reduction in the outstanding balance during the year as the related party settled most of the outstanding balance. The 2019 valuation does not include prepayments.

	FRS €'000	Valuation & Reclassification Adjustments	Solvency II Valuation Adjustments	Solvency II €'000	Solvency II $'000
	2019	2019	2019	2019	2019
Trade Receivables	83	0	0	83	93

Note 6: Financial Assets – Cash and cash equivalents

Cash and cash equivalents comprise cash on hand and demand deposits with banks. Cash and cash equivalents are considered to be held at fair value under Solvency II. The cash on fixed term deposit has been reclassified in the Solvency II balance sheet as financial investments, per note 2 above.

Financial Investments	2019 €'000	2019 %	2019 $'000	2019 %
Cash on demand	9,049	58%	10,070	58%
Commercial paper (within 1 month)	6,424	42%	7,149	42%
Total	**15,474**	**100%**	**17,219**	**100%**

D.2 Technical Provisions

The technical provisions comprise the Best Estimate Liabilities ("**BEL**") and the risk margin, under Solvency II rules. At 31st December 2019, the technical provisions were:

Technical Provisions	2019 €'000	2019 $'000
Best Estimate Liabilities (BEL)	461	512
Risk Margin	52	58
Total	**513**	**570**

The technical provisions reduced significantly during the year in line with the run-off of the previously written business. There are no other material changes to inputs and assumptions used for the valuation of the technical provisions.

BEL

The BEL is calculated as the sum of a Gross Premium Reserve and Gross Claims Reserve.

Gross Claims Reserve

The best estimate of provisions for claims outstanding (referred to as the Gross Claims Reserve) is the expected present value of all future claim and expense cash flows related to claim events that occurred prior to the valuation date. Any explicit prudence included the FRS Outstanding Claims reserve is removed to calculate the best estimate Gross Claims Reserve. Claims cashflows are then projected based on historical payment patterns of the business.

An allowance is included for the best estimate value of expenses (including direct and indirect costs) relating to the settling of these claims.

An adjustment is also made to include other accounting liabilities representing future claims cash flows, such as claims payable that are not already included in the FRS Outstanding Claims reserve.

Gross Premium Reserve

The Gross Premium Reserve (of which there was none) is the expected present value in respect of future claim, expense and premium cash flows relating to claims events occurring after the valuation date and before the end of the insurance coverage period for the relevant policies.

The claims cash flows for this reserve are calculated by projecting the future premiums to be earned on business that is legally bound at the valuation date (including business not yet incepted at the valuation date) to the end of the coverage period of the relevant policies.

Future expected incurred claims are projected by applying an appropriate loss ratio to the future earned premium; the corresponding claims cash flows are then projected based on historical payment patterns.

An allowance is included for the best estimate value of expense cash flows (including direct and indirect costs) relating to the settling of these claims and future administration of these policies. The Gross Premium Reserve includes allowance for the value of premiums not yet due and other relevant insurance receivables or payables.

The BEL claims cash flows include allowance for ENIDs so that the BEL reflects an expected probability-weighted average of future cash flows.

The cashflows for the Gross Claims Reserve and Gross Premium Reserve are then discounted at yields provided by EIOPA, depending on the projected timing and currency of the cashflows.

Risk Margin

The risk margin is calculated using the following assumptions:

- the business, including reinsurance, is transferred to a reference undertaking with no other insurance obligations or own funds before the transfer, and which does not write any further business (including renewals of existing business);
- the reference undertaking is capitalized as described under Solvency II rules; and
- the assets are selected to minimize market risk.

The SCR under the above assumptions is projected for future years using key risk drivers. The risk margin is calculated by multiplying the projected SCRs by a 6% Cost of Capital and discounting to the valuation date.

FRS value of technical reserves vs Solvency II Technical Provisions

The quantification of the difference between the FRS value of technical reserves and the Solvency II Technical Provisions for the Company is shown below:

Technical Provisions	**2019 €'000**	**2019 $'000**
FRS Outstanding Claims Reserve (OCR)	481	535
FRS Unearned Premium Reserve (UPR)	0	0
FRS Technical reserve	481	535
Remove:		
Prudence in FRS Outstanding Claims Reserve	-32	-35
Unearned Premium Reserve	0	0
Premiums not yet due and other receivables/ payables	0	0
Add:		
Project Gross Premium Reserve claims (excluding Business Bound Not Incepted)	0	0
Additional allowance for Events Not In Data	11	12
Best estimate expense allowance for incepted contracts	0	0
Net Bound But Not Incepted (BBNI) cashflows	0	0
Discounting of claims and expense cashflows	0	0
Total FRS to Solvency II Best Estimate adjustments	-20	-23
Best Estimate Liability	461	512
Add Risk Margin	52	58
Technical Provisions	**513**	**570**

Technical Provisions – Uncertainty

The main sources of uncertainty in the technical provisions relate to cases where actual claims or expense experience may emerge to be worse than expected. The following are key areas where actual experience may differ from that assumed in the technical provision calculation:

- Actual claims experience for past dates of treatment could be higher than that estimated in the claims reserve.
- Claims experience on incepted and bound but not incepted contracts for future dates of treatment could be higher than that estimated in the premium reserve.
- Actual expense costs relating to claims yet to be paid could be higher than expected.

Given the small nature of the technical provisions, there are no scenarios that would materially impact the Company's solvency ratio.

D.3 Other Liabilities

Note 7: Insurance Balances payable

The insurance balances payable comprises amounts arising on direct insurance operations, which are not included in the technical provisions. Claims liabilities included under insurance balances payable in the FRS balance sheet are included in the calculation of the Technical Provisions under Solvency II valuation rules.

These liabilities are measured as amounts past due, which represent the amounts expected to be paid, and are measured based on a valuation amount for which they could be settled between knowledgeable willing parties in an arm's length transaction.

Note 8: Trade and Other payables

Trade payables include amounts due to suppliers, public entities, etc, and which are not insurance related. Trade payables solely comprise amounts which fall due within 12 months and are considered to be held at fair value, representing the value at which the balances could be exchanged between two knowledgeable and willing parties in an arm's length transaction.

Note 9: Other liabilities

Other liabilities include amounts payable to related parties within the CVS Group. These liabilities are measured as past due at the valuation date and therefore represent the amount expected to be paid.

There were no changes to the base assumptions used in the calculation of liabilities for the Reporting Period.

D.4 Alternative Valuation Methods

There are no alternative valuation methods applied to the valuation of Company's assets.

D.5 Other Material Information

The information presented in Section D provides the valuation for Solvency Purposes of the Company during the period.

E. CAPITAL MANAGEMENT

E.1 Own Funds

Composition and quality of own funds

Under Solvency II regulation, capital is referred to as Own Funds and the regulation distinguishes between Basic Own Funds (BOF) and Ancillary Own Funds (AOF). There are tiers of Own Funds and restrictions applied to the extent to which the various components of Own Funds can be used to meet the capital requirements.

Equity in Financial Statements at 31st December 2019	Tier 1	Tier 2	Tier 3	Total 2019 €'000	Total 2019 $'000
Ordinary Share Capital	635			635	929
Capital contribution	23,030			23,030	25,978
Reconciliation Reserve	-9,233			-9,233	-10,847
Basic Own Funds	14,432			14,432	16,060
Deferred Tax Asset	0			0	0
Own Funds available to meet SCR	**14,432**	**0**	**0**	**14,432**	**16,060**

The Company's ordinary share capital is classified as Tier 1 capital since the Company's Articles of Association do not prohibit the cancellation of dividends after they have been declared.

The Company has no restricted Tier 1 capital. There is just once class of ordinary share issued by the Company. All the issued shares are fully paid up. There are no other classes of shares issued, nor any subordinated loans issued by the Company.

Approach to Capital Management

Capital management focuses on ensuring that there is sufficient capital retained to meet the regulatory requirements (MCR and SCR). The finance function provides the Board and its Audit Committee with information on the Company's capital position and monitors the surplus in line with internal, regulatory and rating agency capital requirements. The finance, risk management and actuarial functions collaborate to provide the Board with internal and regulatory stress testing.

The Company Capital Plan aims to:

- document the regulatory and minimum capital levels under baseline and stress scenarios; and
- describe the capital implications and actions required in the event that a stress scenario occurs.

The Capital Plan is an analysis of the Company's capital sources and uses a three-year time frame that takes into consideration:

- macroeconomic and financial market scenarios;
- business and strategic plan;
- applicable regulations; and

- capital resources calculated under future scenarios using the Solvency II standard formula.

The Company has an active capital management process to ensure it meets regulatory capital requirements and rating agency expectations.

Details of the capital movements during the period are shown in the table below:

Capital issued	Opening 2019 €'000	New Issue €'000	Exchange Movement €'000	Closing 2019 €'000	Closing 2019 $000
Ordinary Share Capital	635	0	0	635	929
Capital contribution	23,030	0	0	23,030	25,978
Total	**23,665**	**0**	**0**	**23,665**	**26,907**

The total eligible amount of own funds to cover the Solvency Capital Requirement ("**SCR**") is €14,432k and the total amount of unrestricted Tier 1 own funds to cover the Minimum Capital Requirement ("**MCR**") is €14,432k.

The following table reconciles to the bridge between FRS and Solvency II as shown in section D of this document. The main driver for the change in the reconciliation reserve, is the change in the valuation of technical provisions. There are no material changes to the inputs or assumptions used for the valuation of the technical provisions.

Reconciliation Reserve	2019 €'000	2019 $'000
Excess of Assets over Liabilities in Solvency II Balance Sheet	14,432	16,060
Less:		
Ordinary Share Capital	635	929
Capital Contribution	23,030	25,978
Reconciliation Reserve	**-9,233**	**-10,847**

E.2 SCR and MCR

The amount of the Company's SCR and MCR at the end of the Reporting Period are €2,099k and €2,500k respectively.

SCR

The table below shows the components of the SCR (using the Standard Formula) at 31st December 2019.

SCR Calculation	2019 €'000	2019 $'000
Market Risk	1,655	1,841
Default Risk	628	698
Health Risk	440	490
Diversification	-638	-709
Basic Solvency Capital Requirement	2,085	2,320
Operational Risk	14	15
SCR	**2,099**	**2,335**
Minimum Solvency Capital Requirement	**2,500**	**2,782**
Own Funds available to meet SCR/MCR:	**14,432**	**16,060**

MCR

The MCR was calculated using the following inputs:

- net of reinsurance BEL €461k.
- SCR of €2,099k

These inputs were used in the calculation according to Articles 248-253 of the Solvency II Directive. The resulting MCR is lower than the regulatory minimum of €2,500 and therefore this threshold applies.

The SCR is calculated using the Standard Formula with no undertaking specific parameters applied.

E.3 Material Changes in the SCR and MCR over the Reporting Period

There has been no material change in the methodology used to calculate the Company's MCR and SCR during the reporting period.

E.4 Use of duration-based equity sub-module in the calculation of the SCR

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

E.5 Differences between the Standard Formula and Internal Model used

The Company uses the Standard Formula to calculate the SCR and therefore no difference exists.

E.6 Non-Compliance

During the Reporting Period, there were no instances of non-compliance with the Solvency II capital requirements.

QRT Templates for the SFCR Public Disclosure

Appendix 1 Balance Sheet

S.02.01.02

Balance sheet

000s

		Solvency II value
		C0010
Assets		
Goodwill	R0010	
Deferred acquisition costs	R0020	
Intangible assets	R0030	
Deferred tax assets	R0040	
Pension benefit surplus	R0050	
Property, plant & equipment held for own use	R0060	
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	6,424
Property (other than for own use)	R0080	
Holdings in related undertakings, including participations	R0090	
Equities	R0100	
Equities - listed	R0110	
Equities - unlisted	R0120	
Bonds	R0130	6,424
Government Bonds	R0140	
Corporate Bonds	R0150	6,424
Structured notes	R0160	-
Collateralised securities	R0170	
Collective Investments Undertakings	R0180	-
Derivatives	R0190	
Deposits other than cash equivalents	R0200	
Other investments	R0210	
Assets held for index-linked and unit-linked contracts	R0220	
Loans and mortgages	R0230	
Loans on policies	R0240	
Loans and mortgages to individuals	R0250	
Other loans and mortgages	R0260	
Reinsurance recoverables from:	R0270	
Non-life and health similar to non-life	R0280	
Non-life excluding health	R0290	
Health similar to non-life	R0300	
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	
Health similar to life	R0320	
Life excluding health and index-linked and unit-linked	R0330	
Life index-linked and unit-linked	R0340	
Deposits to cedants	R0350	
Insurance and intermediaries receivables	R0360	64
Reinsurance receivables	R0370	
Receivables (trade, not insurance)	R0380	20
Own shares (held directly)	R0390	
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	
Cash and cash equivalents	R0410	9,050
Any other assets, not elsewhere shown	R0420	
Total assets	**R0500**	15,558

S.02.01.02

Balance sheet

000s

		Solvency II value
		C0010
Liabilities		
Technical provisions – non-life	R0510	
Technical provisions – non-life (excluding health)	R0520	
Technical provisions calculated as a whole	R0530	
Best Estimate	R0540	
Risk margin	R0550	
Technical provisions - health (similar to non-life)	R0560	513
Technical provisions calculated as a whole	R0570	
Best Estimate	R0580	461
Risk margin	R0590	52
Technical provisions - life (excluding index-linked and unit-linked)	R0600	
Technical provisions - health (similar to life)	R0610	
Technical provisions calculated as a whole	R0620	
Best Estimate	R0630	
Risk margin	R0640	
Technical provisions – life (excluding health and index-linked and unit-linked)	R0650	
Technical provisions calculated as a whole	R0660	
Best Estimate	R0670	
Risk margin	R0680	
Technical provisions – index-linked and unit-linked	R0690	
Technical provisions calculated as a whole	R0700	
Best Estimate	R0710	
Risk margin	R0720	
Other technical provisions	R0730	
Contingent liabilities	R0740	
Provisions other than technical provisions	R0750	
Pension benefit obligations	R0760	
Deposits from reinsurers	R0770	
Deferred tax liabilities	R0780	
Derivatives	R0790	
Debts owed to credit institutions	R0800	
Financial liabilities other than debts owed to credit institutions	R0810	
Insurance & intermediaries payables	R0820	
Reinsurance payables	R0830	476
Payables (trade, not insurance)	R0840	
Subordinated liabilities	R0850	
Subordinated liabilities not in Basic Own Funds	R0860	
Subordinated liabilities in Basic Own Funds	R0870	
Any other liabilities, not elsewhere shown	R0880	137
Total liabilities	**R0900**	1,126
Excess of assets over liabilities	**R1000**	14,432

Appendix 2 Premiums Claims Expenses

S.05.01.01
Premiums, claims and expenses by line of business
000s
Non-Life (direct business/accepted proportional reinsurance and accepted non-proportional reinsurance)

		Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)												Line of Business for: accepted non-proportional				Total
		Medical expense insurance	Income protection insurance	Workers' compensation	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship	Legal expenses insurance	Assistance	Miscellaneous financial loss	Health	Casualty	Marine, aviation, transport	Property	
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0200
Premiums written																		
Gross - Direct Business	R0110																	
Gross - Proportional reinsurance accepted	R0120																	
Gross - Non-proportional reinsurance accepted	R0130																	
Reinsurers' share	R0140																	
Net	R0200																	
Premiums earned																		
Gross - Direct Business	R0210																	
Gross - Proportional reinsurance accepted	R0220																	
Gross - Non-proportional reinsurance accepted	R0230																	
Reinsurers' share	R0240																	
Net	R0300																	
Claims incurred																		
Gross - Direct Business	R0310	(175)																(175)
Gross - Proportional reinsurance accepted	R0320																	
Gross - Non-proportional reinsurance accepted	R0330																	
Reinsurers' share	R0340																	
Net	R0400	(175)																(175)
Changes in other technical provisions																		
Gross - Direct Business	R0410																	
Gross - Proportional reinsurance accepted	R0420																	
Gross - Non- proportional reinsurance accepted	R0430																	
Reinsurers' share	R0440																	
Net	R0500																	
Expenses incurred	R0550																	
Administrative expenses																		
Gross - Direct Business	R0610	1,030																1,030
Gross - Proportional reinsurance accepted	R0620																	
Gross - Non-proportional reinsurance accepted	R0630																	
Reinsurers' share	R0640																	
Net	R0700	1,030																1,030
Investment management expenses																		
Gross - Direct Business	R0710																	
Gross - Proportional reinsurance accepted	R0720																	
Gross - Non-proportional reinsurance accepted	R0730																	
Reinsurers' share	R0740																	
Net	R0800																	
Claims management expenses																		
Gross - Direct Business	R0810																	
Gross - Proportional reinsurance accepted	R0820																	
Gross - Non-proportional reinsurance accepted	R0830																	
Reinsurers' share	R0840																	
Net	R0900																	
Acquisition expenses																		
Gross - Direct Business	R0910																	
Gross - Proportional reinsurance accepted	R0920																	
Gross - Non-proportional reinsurance accepted	R0930																	
Reinsurers' share	R0940																	
Net	R1000																	
Overhead expenses																		
Gross - Direct Business	R1010																	
Gross - Proportional reinsurance accepted	R1020																	
Gross - Non-proportional reinsurance accepted	R1030																	
Reinsurers' share	R1040																	
Net	R1100																	
Other expenses	R1200																	
Total expenses	R1300																	1,030

Appendix 3 Premiums Claims Expenses by Country

S.05.02.01

Premiums, claims and expenses by country

000s

		Home Country - non-life obligations	Top 5 countries (by amount of gross premiums written) - non-life	Total Top 5 and home country - non-life obligations
		Home country	Country (by amount of gross premiums written)	Total Top 5 and home country
		C0080	C0090	C0140
Premiums written				
Gross - Direct Business	R0110			
Gross - Proportional reinsurance accepted	R0120			
Gross - Non-proportional reinsurance	R0130			
Reinsurers' share	R0140			
Net	R0200			
Premiums earned				
Gross - Direct Business	R0210			
Gross - Proportional reinsurance accepted	R0220			
accepted	R0230			
Reinsurers' share	R0240			
Net	R0300			
Claims incurred				
Gross - Direct Business	R0310	(175)		(175)
Gross - Proportional reinsurance accepted	R0320			
Gross - Non-proportional reinsurance	R0330			
Reinsurers' share	R0340			
Net	R0400	(175)		(175)
Changes in other technical provisions				
Gross - Direct Business	R0410			
Gross - Proportional reinsurance accepted	R0420			
accepted	R0430			
Reinsurers' share	R0440			
Net	R0500			
Expenses incurred	R0550	1,030		1,030
Other expenses	R1200			
Total expenses	R1300			1,030

Appendix 4 Non Technical Provisions

S.17.01.02
000s
Non-Life Technical Provisions

		Direct business and accepted proportional reinsurance												Accepted non-proportional reinsurance				
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance	**Total Non-Life obligation**
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180
Technical provisions calculated as a whole	R0010																	-
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole	R0050																	-
Technical provisions calculated as a sum of BE and RM																		
Best estimate																		
Premium provisions																		
Gross	R0060																	-
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140																	-
Net Best Estimate of Premium Provisions	R0150																	-
Claims provisions																		
Gross	R0160	461																461
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240																	-
Net Best Estimate of Claims Provisions	R0250	461																461
Total Best estimate - gross	R0260	461																461
Total Best estimate - net	R0270	461																461
Risk margin	R0280	52																52
Amount of the transitional on Technical Provisions																		
Technical Provisions calculated as a whole	R0290	-																-
Best estimate	R0300	-																-
Risk margin	R0310	-																-
Technical provisions - total																		
Technical provisions - total	R0320	513																513
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	R0330																	-
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	R0340	513																513

Appendix 5 Non Life Insurance Claims

S.19.01.21

Non-life insurance claims

Gross Claims Paid (non-cumulative) - Development year. Total Non-Life Business

000s

		Development Year										
		0	1	2	3	4	5	6	7	8	9	10 & +
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110
Prior	R0100											
N-9	R0160											
N-8	R0170											
N-7	R0180											
N-6	R0190	16,638	1,067	59	131	9	-	-				
N-5	R0200	17,299	598	73	48	10	-					
N-4	R0210	12,948	399	36	31	9						
N-3	R0220	428	2	4	-							
N-2	R0230	-	-	-								
N-1	R0240	-	-									
N	R0250	-										

Gross Claims Paid (non-cumulative) - Current year, sum of years (cumulative). Total Non-Life Business

		In Current year	Sum of years (cumulative)
		C0170	C0180
Prior	R0100		
N-9	R0160		
N-8	R0170		
N-7	R0180		
N-6	R0190	-	17,904
N-5	R0200	-	18,028
N-4	R0210	9	13,423
N-3	R0220	-	434
N-2	R0230	-	-
N-1	R0240	-	-
N	R0250	-	-
Total	R0260	9	49,789

Gross undiscounted Best Estimate Claims Provisions - Development year. Total Non-Life Business

		Development Year										
		0	1	2	3	4	5	6	7	8	9	10 & +
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300
Prior	R0100											
N-9	R0160											
N-8	R0170											
N-7	R0180											
N-6	R0190											
N-5	R0200											
N-4	R0210											
N-3	R0220				29							
N-2	R0230											
N-1	R0240											
N	R0250	432										

		Year end (discounted data)
		C0360
Prior	R0100	
N-9	R0160	
N-8	R0170	
N-7	R0180	
N-6	R0190	
N-5	R0200	
N-4	R0210	
N-3	R0220	29
N-2	R0230	
N-1	R0240	
N	R0250	432
Total	R0260	461

Appendix 6 Own Funds

S.23.01.01
Own funds
000s

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35						
Ordinary share capital (gross of own shares)	R0010	635	635			
Share premium account related to ordinary share capital	R0030	-	-			
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040					
Subordinated mutual member accounts	R0050					
Surplus funds	R0070					
Preference shares	R0090					
Share premium account related to preference shares	R0110					
Reconciliation reserve	R0130	(9,233)	(9,233)			
Subordinated liabilities	R0140					
An amount equal to the value of net deferred tax assets	R0160					
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180	23,030	23,030			
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds						
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220					
Deductions						
Deductions for participations in financial and credit institutions	R0230					
Total basic own funds after deductions	R0290	14,432	14,432	-	-	-
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300					
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310					
Unpaid and uncalled preference shares callable on demand	R0320					
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330					
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340					
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350					
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360					
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370					
Other ancillary own funds	R0390					
Total ancillary own funds	R0400					
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	14,432	14,432			
Total available own funds to meet the MCR	R0510	14,432	14,432			
Total eligible own funds to meet the SCR	R0540	14,432	14,432			
Total eligible own funds to meet the MCR	R0550	14,432	14,432			
SCR	R0580	2,099				
MCR	R0600	2,500				
Ratio of Eligible own funds to SCR	R0620	688%				
Ratio of Eligible own funds to MCR	R0640	577%				

S.23.01.01.02
Reconciliation reserve
000s

		C0060
Reconciliation reserve		
Excess of assets over liabilities	R0700	14,432
Own shares (held directly and indirectly)	R0710	
Foreseeable dividends, distributions and charges	R0720	
Other basic own fund items	R0730	23,665
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	
Reconciliation reserve	R0760	(9,233)
Expected profits		
Expected profits included in future premiums (EPIFP) - Life business	R0770	
Expected profits included in future premiums (EPIFP) - Non-life business	R0780	
Total Expected profits included in future premiums (EPIFP)	R0790	

Appendix 7 Solvency capital requirement

S.25.01.21

Solvency Capital Requirement - for undertakings on Standard Formula

Basic Solvency Capital Requirement

000s

		Gross solvency capital requirement	Simplifications
		C0110	C0120
Market risk	R0010	1,655	
Counterparty default risk	R0020	628	
Life underwriting risk	R0030	-	
Health underwriting risk	R0040	440	
Non-life underwriting risk	R0050	-	
Diversification	R0060	(638)	
Intangible asset risk	R0070	-	
Basic Solvency Capital Requirement	R0100	2,085	

Basic Solvency Capital Requirement (USP)

000s

		USP
		C0090
Life underwriting risk	R0030	
Health underwriting risk	R0040	440
Non-life underwriting risk	R0050	

S.25.01.21.02

Calculation of Solvency Capital Requirement

000s

		Value
		C0100
Operational risk	R0130	14
Loss-absorbing capacity of technical provisions	R0140	-
Loss-absorbing capacity of deferred taxes	R0150	-
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/	R0160	-
Solvency Capital Requirement excluding capital add-on	R0200	2,099
Capital add-on already set	R0210	-
Solvency capital requirement	R0220	2,099
Other information on SCR		
Capital requirement for duration-based equity risk sub-module	R0400	-
Total amount of Notional Solvency Capital Requirements for remaining part	R0410	-
Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420	-
Total amount of Notional Solvency Capital Requirements for matching adjustment p	R0430	-
Diversification effects due to RFF nSCR aggregation for article 304	R0440	-

Appendix 8 Minimum Capital requirement

S.28.01.01
Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity
000s

		MCR components
		C0010
MCR_{NL} Result	R0010	22

		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	461	-
Income protection insurance and proportional reinsurance	R0030		
Workers' compensation insurance and proportional reinsurance	R0040		
Motor vehicle liability insurance and proportional reinsurance	R0050		
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		
General liability insurance and proportional reinsurance	R0090		
Credit and suretyship insurance and proportional reinsurance	R0100		
Legal expenses insurance and proportional reinsurance	R0110		
Assistance and proportional reinsurance	R0120		
Miscellaneous financial loss insurance and proportional reinsurance	R0130		
Non-proportional health reinsurance	R0140		
Non-proportional casualty reinsurance	R0150		
Non-proportional marine, aviation and transport reinsurance	R0160		
Non-proportional property reinsurance	R0170		

Linear formula component for life insurance and reinsurance obligations

		C0040
Linear formula component for life insurance and reinsurance obligations	R0200	-

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

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

Overall MCR calculation

		C0070
Linear MCR	R0300	22
SCR	R0310	2,099
MCR cap	R0320	945
MCR floor	R0330	525
Combined MCR	R0340	525
Absolute floor of the MCR	R0350	2,500
Minimum Capital Requirement	R0400	2,500

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