


Euro Insurances DAC (LPINS)

Solvency and Financial Condition Report (“SFCR”) 2022



For the year-end 31 December 2022

Contents

Executive Summary	6
a) Summary Section A: Business and Performance	6
b) Summary Section B: System of Governance	7
c) Summary Section C: Risk Profile	8
d) Summary Section D: Valuation for Solvency Purposes	8
e) Summary Section E: Capital Management	9
f) Summary: Material Changes over the Reporting Period	10
 A Business and Performance	 11
1. Business and External Environment	11
a) Name and Legal Form	11
b) Supervisor and External Auditor	11
c) Position within the Group	11
d) Material Lines of Business and Geographical Areas	11
e) Significant Events over the Period	12
2. Underwriting Performance	13
a) Underwriting Performance by Material Line of Business / Geographical Area	13
3. Investment Performance	15
a) Investment Performance by Asset Class	15
b) Investments in Securitisations	15
4. Performance of other activities	16
a) Description of Other Material Income / Expenses	16
5. Any other information	17
 B System of Governance	 18
1. General Information on the System of Governance	18
a) Board and Sub-Committee Structure	18
b) Remuneration Policy and Practice	19
c) Material Transactions with Connected Persons	20
2. Fit and Proper Requirements	21
3. Risk Management System including the Own Risk and Solvency Assessment	22
a) Risk Management System	22
b) Own Risk and Solvency Assessment	23
4. Internal Control System	26
a) Compliance Function	26
5. Internal Audit Function	28
6. Actuarial Function	29

7.	Outsourcing	30
8.	Any other information	31
C	Risk Profile	32
1.	Underwriting Risk	33
a)	Risk Exposure	33
b)	Risk Concentration	33
c)	Risk Mitigation	33
d)	Risk Sensitivity	34
2.	Market Risk	35
a)	Risk Exposure	35
b)	Risk Concentration	35
c)	Risk Mitigation	35
d)	Risk Sensitivity	36
3.	Credit Risk	37
a)	Risk Exposure	37
b)	Risk Concentration	37
c)	Risk Mitigation	38
d)	Risk Sensitivity	38
4.	Liquidity Risk	39
a)	Risk Exposure	39
b)	Risk Concentration	39
c)	Risk Mitigation	40
d)	Risk Sensitivity	40
5.	Operational Risk	42
a)	Risk Exposure	42
b)	Risk Concentration	42
c)	Risk Mitigation	42
d)	Risk Sensitivity	43
6.	Any other material risks	44
a)	Cyber Risk	44
b)	Sustainability and Climate Change	44
c)	Group Risk	45
d)	Strategic Risk	45
e)	Reputational Risk	45
D	Valuation for Solvency Purposes	46
1.	Assets	46
2.	Technical Provisions	49
a)	Technical Provisions Basis, Methods and Assumptions	49
b)	Level of Uncertainty associated with the amount of Technical Provisions	52
c)	Solvency II Best Estimate VS Financial Statement Reserves	54
d)	Application of the Matching Adjustment	54
e)	Application of the Volatility Adjustment	54

f)	Application of the Transitional Risk-Free Interest Rate-Term Structure	54
g)	Application of the Transitional Deduction	54
h)	Recoverables from Reinsurance Contracts	55
3.	Other Liabilities	55
4.	Alternative Methods for Valuation	57
5.	Any other information	58
E	Capital Management	59
1.	Own Funds	59
a)	Objectives / Policies / Processes for Managing Own Funds	59
b)	Own Funds by Tier	60
c)	Own Funds Eligible to Cover SCR	60
d)	Own Funds Eligible to Cover MCR	61
e)	Differences between Equity in Financial Statements and Basic Own Funds	61
f)	Own Funds Items subject to Transitional Arrangements	62
g)	Ancillary Own Funds	62
h)	Restrictions on Own Funds	62
2.	Solvency Capital Requirement and Minimum Capital Requirement	63
a)	Amount of SCR and MCR	63
b)	Amount of SCR by Risk Modules	63
c)	Simplified Calculations and / or Company Specific Parameters	63
d)	Undertaking Specific Parameters (USPs) and / or Capital Add-Ons	63
e)	Amount of Capital Add-Ons	63
f)	Inputs for MCR	64
g)	Loss-Absorbing Capacity of Deferred Taxes (LACDT)	64
3.	Use of the duration-based equity risk sub-module in the calculation of the Solvency Capital Requirement	65
4.	Differences between the standard formula and any internal model Information	66
5.	Non-compliance with the Minimum Capital Requirement and non-compliance with the Solvency Capital Requirement	67
6.	Any other information	68
	Appendix I: Glossary	69
	Appendix II: LPINS Related parties	70
	Appendix III: Quantitative Reporting Templates (“QRTs”)	71
1.	S.02.01.02	72
2.	S.05.01.02	74
3.	S.05.02.01	76

4.	S.12.01.02	78
5.	S.17.01.02	79
6.	S.19.01.21	80
7.	S.23.01.01	82
8.	S.25.01.21	83
9.	S.28.01.01	84

Executive Summary

This Solvency and Financial Condition Report (“SFCR”) has been prepared in line with the requirements of the Solvency II (“SII”) Regulations, to assist clients of Euro Insurances DAC (“the Company” or “LPINS”) and other stakeholders in understanding the nature of our business, how it is managed, and its solvency position.

The structure of this SFCR follows the requirements set forth in Annex XX of the Solvency II Delegated Acts and consists of the following sections: (A) Business and Performance, (B) System of Governance, (C) Risk Profile, (D) Valuation for Solvency II Purposes and (E) Capital Management.

a) Summary Section A: Business and Performance

The Company is a wholly owned subsidiary of LeasePlan Corporation N.V. which has its headquarters at Gustav Mahlerlaan 360, 1082 ME Amsterdam, the Netherlands.

The Company insures / reinsures motor third-party liability risk, own damage risk and ancillary motor and leasing related risks of LeasePlan group companies and third-party clients. The Company operates on a freedom of services (“FoS”) basis into European markets.

The Company’s profit after tax for the financial year 2022 was €51.9m. The following table summarises the financial performance of the Company for the reporting period ending 31 December 2022:

Financial Performance as at 31 December 2022 (€'000)	
	Amount
Underwriting Performance	70,423
Investment Performance	(379)
Expected Credit Loss	(11)
Other Income and Expenses	(10,589)
Net Profit before Tax	59,444
Unrealised investment gains	0
Comprehensive Income	59,444
Corporation Tax	(7,510)
Comprehensive Income after Tax	51,934

In 2022 the Company achieved underwriting income of €70.4m, net investment income of -€0.4m and incurred other income and expenses not related to the underwriting or investment income of -€10.6m.

The main driver for the reduction in profit after tax in 2022 was claim frequency returning to pre COVID-19 levels in most jurisdictions. This was in line with expectations and was partially offset by growth in both existing programs and the deployment of new insurance programs across various territories, including a new large fleet in the Netherlands.

Other challenges in 2022 were the economic impact of the Ukrainian Crisis and the inflationary environment. Management recognised the potential risks to its profitability. The Company has increased monitoring of its claim's costs including regular communication with LeasePlan entities and claim handlers to monitor developments in each country. In addition, the Company is engaging with the LeasePlan entities in relation to the effectiveness of cost savings and inflation mitigants which they have implemented.

The Company's investment loss for 2022 was €0.4m (2021: loss of €2.4m). The investment market changed in 2022 with interest rates moving from negative to positive. This had a positive impact on the Company's investment return in the second half of 2022.

Overhead costs were higher in 2022 than in 2021 due to higher staff costs driven by increased headcount and consulting costs required to support the Company's development. The Company continued to invest in strengthening its key processes and projects.

Refer to [Section A](#) for further detail relating to business and performance.

b) [Summary Section B: System of Governance](#)

The Board's responsibility includes ensuring that an appropriate system of governance is in place throughout the Company. To discharge this responsibility, the Board has established frameworks for risk management and internal control using the "Three Lines of Defence" model, as follows:

- **1st Line of Defence (Business Operations):** Business management is responsible for the identification and assessment of risks and the implementation and enforcement of controls.
- **2nd Line of Defence (Oversight & Challenge):** Board sub-committees and Control Functions provide key oversight of activities in business operations and challenge the completeness/accuracy of risk identification, assessment and controls.
- **3rd Line of Defence (Independent Assurance):** Internal Audit provides independent and objective assurance on the robustness of the Risk Management System, and the appropriateness and effectiveness of internal controls.

In addition, the Company has adopted a Fit and Proper Person Policy and operates a Code of Conduct for all staff. In particular, all persons performing Control Functions (CFs) must be competent and capable demonstrated through having obtained appropriate qualifications and skills, having sound knowledge of the Company's business, understanding of the applicable regulatory and legal environment and maintaining compliance with the Central Bank of Ireland's Minimum Competency Requirements where applicable. The Company operates a range of controls over its outsourcing.

Management considers the Company to have a robust system of governance appropriate to the nature, scale and complexity of its operations.

Refer to [Section B](#) for further detail on the Company's system of governance.

c) Summary Section C: Risk Profile

The Company's risk landscape comprises, at a minimum, underwriting risk, market risk, credit risk, operational risk and liquidity risk that arise as a result of doing business. These risks are assessed within the Company using an entity level risk assessment conducted by management, process level assessments conducted by process owners and a strategic risk assessment conducted by the Board Risk Committee.

For those risk types managed through the holding of capital, the Company measures and monitors its risk profile based on the Solvency Capital Requirement ("SCR"). A summary of the Company's SCR by primary risk type as at 31 December 2022 is set out below (please note that the diversification benefit explains the summation of the individual components exceeding the overall requirement):

€'000	LPINS Capital Requirements
Market risk	32,178
Counterparty default risk	17,370
Non-life underwriting risk	98,583
Health underwriting risk	37,880
Operational risk	7,874
Life underwriting risk	131
LACDT*	(17,288)
SCR	121,018

*where LACDT is the Loss Absorbing Capacity of Deferred Taxes

The Company's largest risk charge is for non-life underwriting risk. This charge represents the risk associated with the writing of insurance business and the settling of claim provisions. Underwriting risk is mitigated through a combination of geographical diversification, underwriting key risk indicators, risk appetite statements and a process-level risk and control self-assessment to assess, monitor and report upon underwriting risk. This risk is also mitigated through the purchase and use of reinsurance.

Although no additional capital is deemed necessary to cover liquidity or other risks, the position regarding the need to hold capital in respect of liquidity or other risks is regularly monitored. A number of mitigating actions relevant to liquidity risk are in place including performing daily and monthly cash flow forecasts to monitor liquidity positions, performing daily monitoring of bank accounts against the monthly cash flow forecast and short matching assets to cover some longer tail technical reserve payment requirements.

Refer to [Section C](#) for further details on the Company's risk profile.

d) Summary Section D: Valuation for Solvency Purposes

Assets, technical provisions and other liabilities are valued in the Company's Solvency II Balance Sheet in accordance with the Solvency II Regulations. The principle that underlies the valuation methodology for Solvency II purposes is that assets and liabilities are valued at the amount for which they could be exchanged, transferred, or settled by knowledgeable and willing third parties in an arm's length transaction – often referred to as the "market consistent" value of assets.

The following table presents a summary of the Solvency II valuation of assets and liabilities compared to the Statutory Accounts as at 31 December 2022:

Comparison of valuation of assets and liabilities under Solvency II vs Statutory Accounts as at 31 December 2022 (€'000)		
	Solvency II	Statutory Accounts Valuation
<i>Assets</i>		
Total Assets	673,987	751,994
<i>Liabilities</i>		
Technical Provisions	261,583	376,376
Other liabilities	100,835	102,442
Total Liabilities	362,418	478,818
Excess of assets over liabilities	311,569	273,176

The main differences between the valuation bases, methods and assumptions used by the Company in the two reporting bases are outlined in [Section D](#).

e) Summary Section E: Capital Management

The strategic objectives of capital management within the Company are to ensure regulatory compliance including maintaining adequate levels of capital, to maintain sufficient liquidity, to manage and allocate capital efficiently, and finally to ensure that all of the above objectives are consistent with the continuation of profitable business in line with Company Strategy.

The following table compares the solvency position of the Company, which is assessed using the Standard Formula as at 31 December 2022 to the position as at 31 December 2021:

LPINS Solvency Position (€'000)	At December 2022	At December 2021
Eligible Own Funds	311,569	258,829
Solvency Capital Requirement	121,018	113,857
SCR Coverage	257%	227%
Minimum Capital Requirement	40,893	39,949
MCR Coverage	762%	648%

All of the Company's own funds are classified as Tier 1 and are available to cover the SCR and the MCR.

There were no instances of non-compliance with the MCR and the SCR during the reporting period.

Refer to [Section E](#) for further details on the Company's capital management.

f) **Summary: Material Changes over the Reporting Period**

This report relates to the financial year ending 31 December 2022. During the year there were no material changes to the areas set out in sections A to E above. Please refer to Section A for significant events over the period.

A Business and Performance

1. Business and External Environment

a) Name and Legal Form

Euro Insurances DAC, trading as LeasePlan Insurance, has its office address at LeasePlan House, Ground Floor, Central Park, Leopardstown, Dublin 18, Ireland.

The Company had 59 FTEs at 31 December 2022.

b) Supervisor and External Auditor

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

The CBI's address is Central Bank of Ireland, New Wapping Street, North Wall Quay, PO Box 559, Dublin 1, Ireland.

The Company's external auditors are KPMG Ireland with an address at 1 Harbourmaster Place, International Financial Services Centre, Dublin 1, Ireland.

The Company's financial year end is 31 December each year and the Company reports in Euro.

c) Position within the Group

The Company is a wholly-owned direct subsidiary of LeasePlan Corporation N.V., with an address at Gustav Mahlerlaan 360, 1082 ME, Amsterdam, The Netherlands.

As of 31 December 2022, LeasePlan Corporation N.V. is indirectly owned by a consortium of the following investors:

- Luxinva SA, a wholly owned subsidiary of the Abu Dhabi Investment Authority (ADIA),
- ATP, Denmark's largest pension fund,
- GIC, a global investment firm in Singapore,
- PGGM, a leading Dutch pension fund service provider, and
- TDR Capital LLP, a British private equity firm which manages funds totalling over €15 billion.

The Company does not have any subsidiaries or branches.

d) Material Lines of Business and Geographical Areas

The Company insures / reinsures the motor damage and third-party liability risks of LeasePlan companies and third-party clients. In addition, it provides cover for ancillary motor and leasing related risks.

The Company mainly deals with LeasePlan entities in Europe under the freedom of services model. As the Company's business is predominately in relation to the leased vehicle fleets of its leasing affiliates, the Company's business is predominately with related parties, including related party policyholders, intermediaries and service providers. The Company's related parties during the year included the entities set out in Appendix II.

e) Significant Events over the Period

In the current heightened inflationary environment, the Company acknowledges the risk to its profitability posed by the potential impact of inflation. In order to assess exposure to inflation, the Company has undertaken a scenario analysis of the potential impact of varying levels of inflation at different durations. Additionally, the Company has increased monitoring of its average claims costs. This includes monitoring per country in conjunction with its LeasePlan affiliates and ensuring that the Company has access to timely data on inflation related developments in its markets. The Company is also engaging with its LeasePlan affiliates in relation to the continued adoption of mitigants to address inflation related risks.

During 2022 the Company finalised IFRS 17 accounting policies, implemented ICT solutions and quantified transitional adjustments to meet the new IFRS 17 accounting standard. The Company has produced the opening balance sheet under IFRS 17. In 2023, the Company will focus on embedding the IFRS 17 process into the day-to-day operations of the company.

The Company continues to focus on growth both in existing and new territories. It is envisaged that one of the main areas for growth in the coming years will be the UK market via a new third country branch.

2. Underwriting Performance

a) Underwriting Performance by Material Line of Business / Geographical Area

The Company insures / reinsures the motor damage and third-party liability risks of LeasePlan companies and third-party clients. In addition, it provides cover for ancillary motor and leasing related risks.

Please find below an overview of underwriting income by geographical area:

Underwriting Income by Geographical Region (€'000)		
Region	2022	2021
Central Europe (Belgium, France, Austria, Germany, Luxembourg)	11,098	10,198
Eastern Europe (Czech Republic, Poland, Hungary, Romania, Slovakia)	16,499	18,453
Northern Europe (Norway, Netherlands, Denmark, Sweden, Finland, Ireland, United Kingdom)	10,349	18,269
Southern Europe (Italy, Spain, Portugal, Greece)	31,715	33,279
Rest of the world (Australia, New Zealand)	762	2,513
Total	70,423	82,712

During 2022, overall underwriting income decreased from €82.7m to €70.4m.

Claims frequency generally returned to pre-Covid-19 pandemic levels with the exception of a small number of jurisdictions. The main challenges in 2022 were the economic impact of the Ukrainian Crisis and the inflationary environment. The Company acknowledges the risk to its profitability posed by the potential impact of inflation. To date, the Company has observed limited impact of inflationary pressures in its claims experience. The Company considers this to be as a result of cost saving measures adopted by the Company's LeasePlan affiliates.

The Company observed an uplift in Catastrophe ("CAT") claims and a deterioration in large claims in the Netherlands.

The increase in underwriting income in the Central Europe region in 2022 was mainly driven by additional income in France and Germany offset by a reduction in the income in Belgium. All other countries were broadly in line with 2021.

The Eastern Europe region result for 2022 shows a reduction in underwriting income of €2m. There was a strong result in Poland which was offset by lower income in the Czech Republic and Romania.

The 2022 underwriting income in Northern Europe was significantly lower than the 2021 income. This was driven by the introduction of an inflation reserve and a deterioration in large claims experience in the Netherlands.

In Southern Europe, 2022 underwriting income of €31.7m was €1.6m lower than 2021. This reflects strong underwriting results across the region as the 2021 result included Covid savings.

The rest of the world relates to the run-off of the Company's Australia and New Zealand books.

The underwriting income figures above exclude overhead expenses and investment income.

The following is an overview of underwriting income by Solvency II Line of Business (“LOB”):

Underwriting Income by SII Line of Business (€'000)		
Line of Business	2022	2021
Income protection	6,202	6,481
Motor vehicle liability	31,809	40,416
Other motor	17,771	22,326
Fire and other damage	370	393
Legal expenses	1,201	856
Assistance	1,554	1,543
Miscellaneous financial loss	10,753	8,184
Other motor (proportional reinsurance)	762	2,513
Total	70,423	82,712

During 2022 overall underwriting income decreased from €82.7m in 2021 to €70.4m in 2022.

Underwriting income for the Income Protection line of business for 2022 is €6.2m. This is in line with the 2021 underwriting income.

Underwriting income for the Motor Vehicle Liability line of business for 2022 of €31.8m is lower than the 2021 underwriting income. This is mainly due to the setup of an inflation reserve and a deterioration in large claims experience in the Netherlands.

The Other Motor line of business saw a reduction of €4.55m in underwriting income compared to 2021. This reduction is mainly due to claims frequency returning to pre-Covid levels and an uplift in claims costs.

The Other motor (proportional reinsurance) line of business shows a reduction in underwriting income of €1.75m between 2021 and 2022. This is due to the fact that the Company’s fronting arrangement in Australia and New Zealand ceased at the end of November 2020 and the 2022 result is driven by releases in reserves.

The underwriting income figures above exclude overhead expenses and investment income.

3. Investment Performance

a) Investment Performance by Asset Class

At the end of 2022, the Company held €552m (2021 €504.2m) in investments as valued on an IFRS basis. The net investment loss relating to deposits during 2022 was €0.54m. The net investment income relating to bonds was €82k.

During the reporting period, interest rates on deposits improved and this had a positive impact on the Company's investment return for the period. There were no management or transaction costs associated with the placement of the deposits.

The Company also holds a selection of bonds, which incur management charges. At the end of 2022, the Company held c.€54.4m in sovereign and corporate bonds.

The Company holds a bond portfolio comprising counterparties with a minimum credit rating of investment grade for an individual holding and a target rating for the overall bond portfolio of A- as issued by Standard and Poor's for corporate bonds and Moody's for government bonds. In addition, the Company holds c.€10m of bonds issued by LeasePlan N.V. (Standard and Poor's rating of BBB-).

The following table compares the Company's investment performance in 2022 with that in 2021:

LPINS Investment Performance (€'000)		
	2022	2021
Deposits & Bonds		
<i>Investment Income</i>	(457)	(2,345)
<i>Deposits</i>	(539)	(2,408)
<i>Bonds</i>	82	63
<i>Gains/Losses</i>	0	0

Bonds held by the Company are valued on an amortised cost basis under IFRS with an IFRS 9 adjustment for Expected Credit Loss. No valuation gains or losses are recognised in the profit and loss or equity. Under Solvency II, the bonds are valued at their market value and any changes in this value will impact the level of assets held by the Company.

b) Investments in Securitisations

The Company holds all funds in deposits, in cash accounts or in bonds. The Company does not hold any securitised investments.

4. Performance of other activities

a) Description of Other Material Income / Expenses

The Company had foreign exchange gains in 2022 of €78k (2021 loss of €69k). Operating Expenses for 2022 were €10.5m (2020 €9.4m).

LPINS - Performance of Other Material Income/Expenses (€'000)		
	2022	2021
Foreign Exchange Gains/Losses	78	(69)
Operating Expenses	(10,537)	(9,448)

Foreign currency transactions are translated into the functional currency utilising the exchange rates prevailing at the date of the transactions. Foreign exchange gains and losses resulting from the settlement of such transactions, and from the translation at year-end exchange rates of monetary assets and liabilities denominated in foreign currencies, are recognised. The Company completes a review of the net assets and liabilities in foreign currencies on a monthly basis and reduces any material exposure. The Company does not engage in foreign exchange trading.

Overhead Expenses for 2022 were €10.5m (2021 €9.4m). In 2022 overhead was €1.1m higher than the previous year. This uplift in overhead was mainly due to an increase in staff related costs. The Company increased its employee numbers during 2021 and 2022, with the 2022 cost reflecting the full annual cost of the higher staff level. The Company continued to invest in strengthening key processes and projects.

Refer to section D.3 of this report for details on operating leases recognised by the Company.

5. Any other information

In January 2022, the Company's parent company, LeasePlan Corporation, and LeasePlan Corporation's shareholders signed a Memorandum of Understanding with ALD Automotive and Société Générale to create a leading global player in mobility. On 28 November 2022, it was announced that ALD Automotive had obtained all required merger control clearances for the acquisition of LeasePlan. The last clearance was obtained from the European Commission on 25 November 2022.

The European Commission's approval is conditional on the divestiture of the subsidiaries carrying on leasing and fleet management business of ALD in Portugal, Ireland and Norway, and of LeasePlan in the Czech Republic, Finland and Luxembourg. The LeasePlan subsidiaries in the Czech Republic, Finland and Luxembourg have been classified as held for sale at 30 November 2022. LeasePlan Corporation continues to work towards the completion of the proposed merger between LeasePlan and ALD Automotive and expects the transaction to close in H1 2023. The Company believes that the proposed acquisition of LeasePlan by ALD will create opportunities for growth in its insurance business.

The Company has no other disclosures to make in respect of the Company's Business and Performance.

B System of Governance

1. General Information on the System of Governance

a) Board and Sub-Committee Structure

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

The Company's Board of Directors carry responsibility for the oversight of the business and sets its strategy and risk appetite. At year-end 2022 the Board comprised the following:

- Board of Directors:
 - J. Sutor, Chairman (Group Non-Executive Director)
 - G. Owens (Non-Executive Director)
 - A. O'Donnell (Independent Non-Executive Director)
 - S. Fay (Independent Non-Executive Director)
 - V. McMullan (Executive Director)
- Company Secretary:
 - M. Clarke

Mr G. Stoelinga resigned from the Board in March 2022.

The Board has established a Board Risk Committee and an Audit Committee to assist it in discharging its obligations. The Board Risk Committee comprises all members of the Board. At year-end 2022, the Audit Committee comprised A. O'Donnell (Chairman), S. Fay and G. Owens. Each Committee operates under defined terms of reference and reports to the Board.

The Company is committed to high standards of corporate governance. The Company has appointed an independent Head of Actuarial Function and the Board has completed an annual review of governance and its committee structures in line with the Corporate Governance Requirements for Insurance Undertakings. During the financial year to 31 December 2022, the Board met on ten occasions, the Audit Committee met on five occasions and the Board Risk Committee met on seven occasions.

The Audit Committee exercises oversight over the Company's Internal Control System and the Board Risk Committee exercises oversight over the Company's Risk Management System.

The Audit Committee assists the Board in discharging its responsibilities in relation to:

- a) The integrity of the Company's financial statements,
- b) The effectiveness of the Company's compliance and internal controls,
- c) The Solvency II Actuarial Function including Actuarial Opinion on Technical Provisions,
- d) The effectiveness of the Company's Internal Audit function, and

- e) Monitoring the effectiveness, independence and objectivity of the external auditor.

The Board Risk Committee assists the Board in discharging its responsibilities in relation to:

- a) The implementation and effectiveness of the Company's Risk Management System,
- b) The timely reporting of material deviations from defined risk appetite,
- c) Reviewing the risk profile of the Company and monitoring the key risks it faces,
- d) Monitoring the performance of outsourced providers, and
- e) The Own Risk and Solvency Assessment (ORSA).

There were no material changes in the Company's system of governance during the year.

b) Remuneration Policy and Practice

The Company's Board has adopted a Remuneration Policy. The aim of the policy is to ensure that the Company's remuneration practices do not encourage excessive risk taking, to promote sound and effective risk management and to ensure that the Company's Remuneration Framework is in line with its values and long-term interests. The Company's Remuneration Policy adopts the Group Remuneration Framework of its parent company, LeasePlan Corporation N. V. The LeasePlan Group Remuneration Framework aims to attract, retain, motivate and reward high-calibre employees to deliver first rate long-term business performance in line with business strategy and approved risk appetite.

LeasePlan Corporation is a Dutch European Central Bank regulated credit institution, and, as a result, the LeasePlan Group Remuneration Framework adopts the remuneration rules applicable to Dutch credit institutions. These rules comprise CRD IV and the Dutch Banking Code, the Regulation on Sound Remuneration Policies pursuant to the Financial Supervision Act 2014, the Dutch Act on Remuneration Policies for Financial Enterprises (Wbfo) and Book 2 of the Dutch Civil Code. The Company, through its Remuneration Policy and the LeasePlan Group Remuneration Framework, is subject to these remuneration rules. In addition, the Company's Remuneration Policy applies the Central Bank of Ireland Guidelines on Variable Remuneration Arrangements for Sales Staff.

In accordance with the Company's Remuneration Policy and the LeasePlan Group Remuneration Framework the following remuneration principles apply to all Company staff:

- a) Variable remuneration is performance-related, consists of a mix of financial (maximum 50%) and non-financial elements and reflects both short-term and long-term strategic goals;
- b) Variable remuneration targets are specific, measurable, attainable, relevant and time-bound;
- c) Variable remuneration in principle cannot exceed 100% of fixed remuneration;
- d) Other benefits for staff are provided in line with market practice; and
- e) Clawback and malus provisions are applicable to all variable remuneration awarded.

The Company's Remuneration Policy seeks to prevent the taking of more risk than is acceptable under the Company's risk appetite framework. Remuneration plans reward performance at group, company and individual level as appropriate. Employee objectives include a combination of financial and non-financial targets, taking into account ethical behaviour and corporate responsibility. Variable

remuneration plans are underpinned by performance management systems in order to reinforce a performance culture.

The Company does not offer share options or shares to staff or Board members. The Company operates a defined contribution pension scheme which is open to all qualifying employees. Non-executive members of the Board do not participate in the scheme. Certain non-executive members of the Board receive remuneration from the Company in respect of their Board membership.

c) **Material Transactions with Connected Persons**

The Company is a wholly owned direct subsidiary of LeasePlan Corporation N.V. The majority of the Company's business is intra-group, meaning that the Company predominately writes insurance in connection with the motor fleet leasing and management activities of its affiliates within the LeasePlan Group. Many of the Company's policyholders, intermediaries, claim handlers and other service providers are subsidiaries of LeasePlan Corporation N.V. and some of the Company's bank deposits and bonds are with LeasePlan Corporation N. V. During the reporting period the Company continued and/or entered into such transactions in the normal course of its business. The Company paid a dividend of €25m to LeasePlan Corporation N. V. in August 2022.

The Company did not enter into material transactions with members of the Board or persons who exercise a significant influence over the Company.

2. Fit and Proper Requirements

The Company has adopted a Fit and Proper Person Policy and operates a Code of Conduct for all staff. The Company's Fit and Proper Person Policy applies the requirements of the Central Bank of Ireland's Fitness and Probity Standards ("the Standards") and the Company complies with same. Persons who hold control functions, including key functions known as Pre-Approval Control Functions (PCFs), are subject to assessment and due diligence in accordance with the policy. The Company assesses the fitness and probity of persons prior to their assumption of the control function concerned. The fitness and probity of holders of control functions is subject to ongoing monitoring and an annual review.

All persons performing Pre-Approval Control Functions must be competent and capable. The Company requires this to be demonstrated through professional or other qualifications, having obtained appropriate skills, demonstrating a sound knowledge of the Company's business, demonstrating an understanding of the applicable regulatory and legal environment and, where applicable, compliance with the Central Bank of Ireland's Minimum Competency Requirements.

The Company's Fit and Proper assessment process comprises an application form, certification, evidence of professional qualifications, evidence of continuing professional development where relevant, interview, references, record of previous experience, concurrent responsibilities and evidence of compliance with the Minimum Competency Requirements where relevant.

The Company's assessment process also includes probity and financial soundness due diligence which includes completion and signature by the individual of the Company's Probity and Financial Soundness Declaration and background checks and searches as prescribed in the Central Bank of Ireland Fitness and Probity Requirements. Following this due diligence, the Company's Fitness and Probity Committee completes, documents and signs the assessment. In addition, for PCFs the Company's Board performs an assessment and an on-line application is made to the Central Bank of Ireland and the Company certifies as to the outcome of its prior assessment. The proposed holder of a PCF may only commence in his/her role following receipt of approval by the Central Bank of Ireland. The Company requires PCF holders to certify annually as to their compliance with the Fitness and Probity Standards and confirm that information provided previously remains accurate.

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

a) Risk Management System

The Company's Risk Management System includes clearly defined risk management objectives, written policies for the material risks faced by the Company, a Risk Management Framework to identify, assess, manage, monitor and report on risks and an Own Risk and Solvency Assessment (ORSA) process.

The Company's Risk Management Strategy takes account of the Company's business strategy and seeks to monitor and manage the risks associated with the implementation of the business strategy.



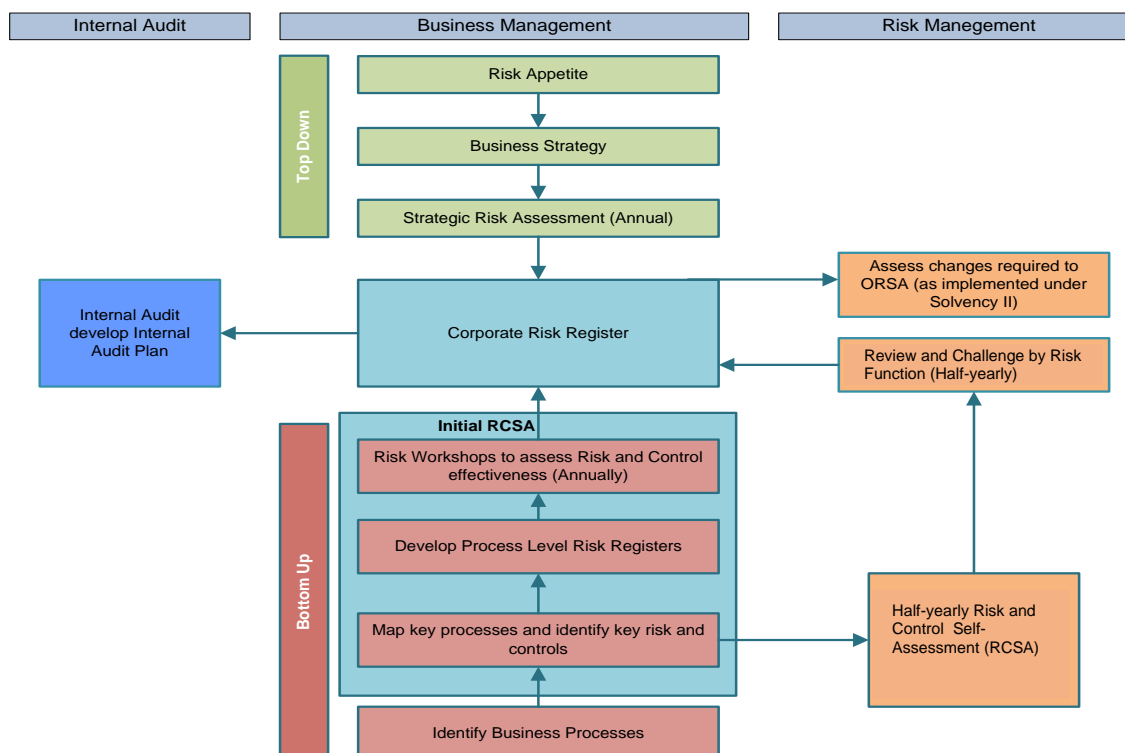
The main objective of the Company's Risk Management System is to ensure that all significant risks are identified, assessed, monitored and controlled within the agreed risk appetite. The framework ensures that the risk management process is explicit and facilitates effective oversight and challenge. Risk control procedures and systems seek to manage, rather than eliminate, the risk of failure to meet business objectives. The Company's Risk Management Framework includes the following processes:

- a) Risk Appetite setting and monitoring;
- b) Company level Enterprise Risk Assessment;
- c) Process level Risk and Control Self-Assessment;
- d) Board level Strategic Risk Assessment; and
- e) Risk Reporting.

The Company in these processes has adopted the 'Risk Control Cycle' in order to identify, assess, manage, monitor and report on the risks to which it is exposed:



The following diagram describes how the Company's Risk Management System is integrated into the Company's organisational structure and decision-making processes.

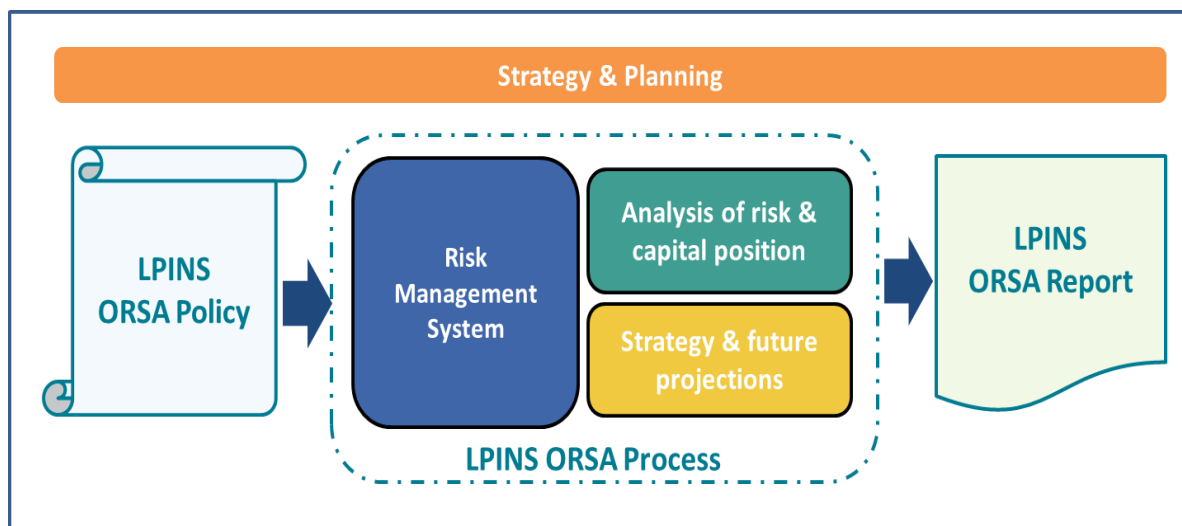


No gaps were identified in the Risk Management System during the reporting period.

b) Own Risk and Solvency Assessment

The Company's Risk Management System includes the conduct of an Own Risk and Solvency Assessment ("ORSA") at least annually and more often in the event of a material change in the Company's risk profile. During the reporting period the Company conducted one scheduled ORSA. No material change occurred necessitating the performance of an ad hoc ORSA during the reporting period.

The Company uses its ORSA process to consider its risk exposures and capital requirements over the business planning timeframe. This acts as a key input into the Company's strategic decision making and business planning process. The Company's ORSA assesses risks inherent in its business and determines its corresponding capital needs whilst taking into consideration its risk profile, approved risk tolerance limits and business strategy. The Company's ORSA process comprises the following steps:

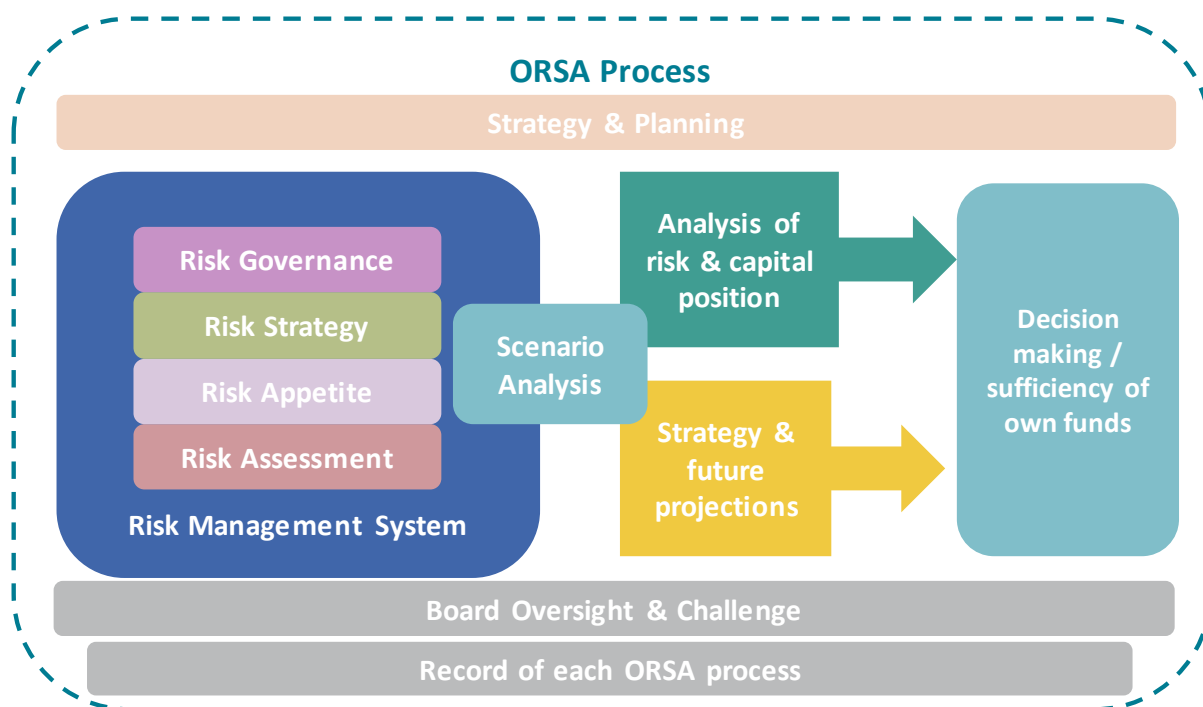


The Company's ORSA process is a circular process that relies on key elements of the business:

- a) Board strategy, policies and plans;
- b) The Solvency II Pillar I Balance Sheet standard model results, and base assumptions used;
- c) The Risk Management System and its outputs, which identifies the key risks;
- d) The Board Risk Committee which reviews, challenges and approves the test scenarios including the ORSA output;
- e) The Actuarial Department which runs the tests on the Balance Sheet for capital adequacy and produce the resultant output;
- f) The Risk Function, Actuarial Department and management which assess the outputs and prepare the reports;
- g) The Actuarial Function which provides its opinion on both the ORSA input stress tests and resultant outputs;
- h) The Board Risk Committee and Board's assessment of the output and resultant capital, strategy and risk appetite review; and
- i) ORSA reporting to the Central Bank of Ireland.

In its ORSA the Company uses, as a base, the Solvency II Standard Formula Model to calculate the required solvency capital but also considers a number of "non-quantifiable" risks when assessing its own solvency needs. The results are subjected to a range of scenario and stress tests that are reviewed by management and challenged by the Board and, where appropriate, potential management actions are noted and conclusions drawn.

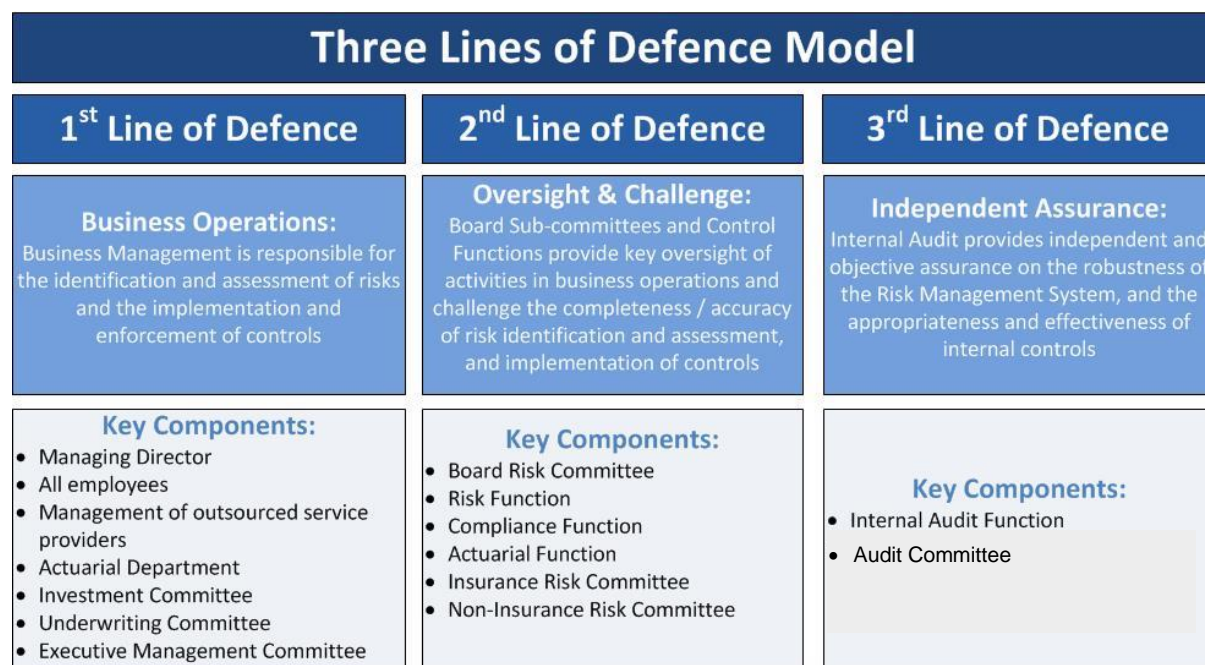
The following diagram depicts the ORSA process in greater detail. It shows that stress and scenario tests are used in conjunction with the assessment of risk and capital to facilitate decisions about the adequacy of the Company's own funds.



ORSA assessments to date indicate that the Company is adequately capitalised.

4. Internal Control System

The Company's Internal Control System consists of five interrelated components, namely control environment, risk assessment, control activities, reporting, and monitoring. The Company's Internal Control System adopts the "Three lines of Defence" model as set out in the following diagram.



The Company's Internal Control System and Internal Control Policy set out the role of each of the first line of defence functions in respect of business operations, the second line of defence functions in relation to oversight and challenge and the third line of defence in relation to independent assurance.

The Actuarial Function, as part of the second line of defence, operates independently of the first line departments which are responsible for determining the Company's technical provisions, underwriting process and reinsurance arrangements.

a) Compliance Function

The Company's Compliance Function, led by the Head of Compliance, operates in accordance with the Company's Compliance Policy. The Compliance Function forms part of the second line of defence within the Company's Internal Control System. The primary activities of the Compliance Function comprise:

- Identification and assessment of compliance obligations;
- Monitoring the impact of changes in the Company's compliance and regulatory environment;
- Development and delivery of an annual compliance plan and report;
- Training, awareness and education;
- Provision of advice on compliance matters;
- Incident management and reporting;
- Liaising with the Central Bank of Ireland and other regulators; and
- Reporting, including to the Board Risk Committee.

The activities of the Compliance Function are subject to periodic audit by Internal Audit.

5. Internal Audit Function

The Company outsources its Internal Audit Function to the Group Audit Department of LeasePlan Corporation N. V. in accordance with the Company's Outsourcing Policy. The Function operates in accordance with the Company's Internal Audit Policy and the LeasePlan Corporation Internal Audit Charter which have been approved by the Board. The policy is reviewed and updated on an annual basis and more frequently if required.

The Company's Internal Audit Function is independent from business units and forms part of the third line of defence in the Company's Internal Control System. The Company's outsourcing of its Internal Audit Function to its parent company assists in preserving the independence and objectivity of the function as the function comprises no staff of the Company. The Company and its Internal Audit Function subscribes to the Institute of Internal Auditors definition of internal audit which requires "independent, objective, assurance". The Company's Internal Audit Policy sets out the measures taken by the Company and the Internal Audit Function to maintain ongoing independence including audit staff rotation.

The Internal Audit Function conducts an internal audit of the Company at least annually. Internal Audit findings and recommendations are reported to the management body who are required to respond to those findings and recommendations.

The Internal Audit Function reports to the Audit Committee of the Company. The Audit Committee considers audit plans, audit reports, resourcing and performance.

6. Actuarial Function

The Company outsources its Actuarial Function, including Head of Actuarial Function, to an actuary and Central Bank approved Head of Actuarial Function within an external professional services firm in accordance with the Company's Outsourcing Policy. The Function operates in accordance with the Company's Actuarial Function Terms of Reference. The Company's Actuarial Function forms part of the second line of defence in the Company's Internal Control System.

The Company's Actuarial Function has the following key responsibilities:

Technical Provisions

- Coordination of calculation of technical provisions including the Actuarial Report on Technical Provisions ("ARTP");
- Review of appropriateness of methodologies and assumptions;
- Review of data sufficiency and quality; and
- Experience analysis.

Opinions

- Delivery of Actuarial Opinion on Technical Provisions ("AOTP") following analysis conducted for the ARTP;
- Delivery of Opinion on the Company's Underwriting Policy;
- Delivery of Opinion on the Company's Reinsurance arrangements; and
- Delivery of Opinion on the Company's ORSA.

Risk Management

- Contributing to the effective implementation of the Risk Management System, in particular with regard to the Solvency Capital Requirement ("SCR") and Minimum Capital Requirement ("MCR"); and contributing to the Own Risk and Solvency Assessment ("ORSA") process.

7. Outsourcing

The Company operates an Outsourcing Policy which is approved by the Board Risk Committee and adopted by the Board. The Outsourcing Policy outlines the Company's policy with regard to the outsourcing of critical or important functions or activities ("Core Outsourcing") which are essential to the operation of the Company. The Company's Outsourcing Policy outlines the roles and responsibilities, procedures, approval requirements, monitoring and reporting requirements applicable to Core Outsourcing.

As the Company is part of the LeasePlan group, much of the Company's outsourcing is to other group entities. The Company's Core outsourced activities comprise:

Core Activity	Description	Jurisdiction of Service Provider
Claims Handling	Provision of claim handling activities on behalf of the Company (some claims handling activities may not constitute critical or material outsourcing and therefore some claim handlers may not be in scope).	Various EEA jurisdictions into which the Company writes insurance
Investment Management (Deposits)	Provision of treasury services to the Company.	Ireland
Data storage and systems support	Management of the platforms that host the Company's systems and data and provision of first line support to the Company.	Ireland and Netherlands
Internal Audit	Provision of internal audit services.	Netherlands
Actuarial Function	Actuarial Function including Head of Actuarial Function.	Ireland
System to support Solvency II Reporting	System to support Solvency II QRT Reporting to the Central Bank of Ireland.	Germany
Investment Management (Bonds)	Exercise of investment discretion within investment guidelines set by the Company.	Ireland
Fiscal representation and administration	Fiscal representation and administration activities in the countries in which the Company operates.	United Kingdom and the various EEA jurisdictions into which the Company writes insurance
Board pack hosting	Board pack hosting and related software-as-a-service.	United Kingdom (data hosted within the EEA)

8. Any other information

The Company believes that its system of governance as set out in the Company's Internal Control System, Risk Management System and Board Charter is adequate in the light of the nature, scale and complexity of the risks inherent in its business. The Company's business is monoline, namely motor and related insurances, and its business is predominately in connection with the fleet leasing and fleet management activities of its affiliate entities within the LeasePlan Group.

The Company believes that its Internal Control System incorporates appropriate challenge and oversight by persons with appropriate knowledge of the Company's business. The Company believes that its Risk Management System, including ORSA, provides a sufficiently forward-looking and robust assessment of risk in the context of the Company's predominately intra-group business model.

Finally, the Company believes that its corporate governance, including Board, sub-committees and management committees, provides appropriate internal review and challenge.

The Company has no other disclosures to make in respect of the Company's System of Governance.

C Risk Profile

The Company is subject to risks in the course of its business. These risks include underwriting risk, market risk, credit risk, liquidity risk and operational risk. Underwriting risk comprises mainly non-life underwriting risk. However, a certain amount of health and life underwriting risks arise incidentally from the non-life insurance contracts written by the Company.

The above risks comprise the Company's primary material risks. These risks are assessed within the Company using an entity-level assessment conducted by management, process-level assessments conducted by process owners and a strategic risk assessment conducted by the Board Risk Committee. The Company's Risk Function, led by the Head of Risk, operates in conjunction with the Risk Function of its parent, LeasePlan Corporation.

The Company has adopted the risk mitigation techniques of its parent company where considered appropriate. The Company operates a Risk Appetite Framework based on capital usage. This capital usage-based risk appetite follows a quantitative and qualitative approach to risk appetite and is integrated with the ORSA process and the Company's business strategy.

During the year there were no material changes to the Company's risk exposure and there were no material changes to the measures used to assess same. The Company does not use special purpose vehicles and does not have exposures arising from off-balance sheet positions.

The table below gives the breakdown of the various risk charges making up the Company's SCR as calculated by the Standard Formula as at 31 December 2022. Please note that diversification benefit explains the summation of the individual components exceeding the overall requirement.

€'000	LPINS Capital Requirements
Market risk	32,178
Counterparty default risk	17,370
Non-life underwriting risk	98,583
Health Underwriting Risk	37,880
Operational risk	7,874
Life underwriting risk	131
LACDT	(17,288)
SCR	121,018

In accordance with the Company's SCR Assurance Process, between year-ends, SCR and SCR coverage ratio are monitored at least on a quarterly basis, to ensure continuous SCR compliance.

1. Underwriting Risk

a) Risk Exposure

During the year, the Company's exposure to underwriting risk was across 20 jurisdictions. The Company's gross written premium during the reporting period was €262.8m across all jurisdictions. Legislation, regulations, market requirements and market practices vary across these markets. Likewise, underwriting requirements and risks vary across these markets. While the Company's underwriting risk is diversified across multiple markets, its knowledge of individual markets is necessarily less than that of domestic insurers in those markets. The Company's Underwriting Risk Policy sets out the Company's processes for the management of underwriting risk. The Company uses a process-level risk and control self-assessment to assess, monitor and report upon underwriting risk. The Company uses key risk indicators and risk appetite statements to monitor its underwriting risk.

The Company's largest risk charge under the SCR is the non-life underwriting risk charge. This charge represents the risk associated with the writing of insurance business and settling of claims provisions. At 31 December 2022, the Company had a non-life underwriting risk charge of €98.6m.

The Company has a risk charge of €37.9m in respect of health underwriting risk owing to its personal accident policies. The bulk of this charge is related to CAT risk which does not fit very well with the Company's business model given that the Company's personal accident cover applies to the driver when they are in or next to their vehicle, meaning that risk concentrations are less likely. The Company also has a small risk charge of €0.1m in respect of life underwriting risk. This risk charge relates to the longevity risk associated with Periodical Payment Orders (PPOs).

b) Risk Concentration

The Company writes various types of non-life insurance risks, including motor third-party liability and motor own damage, as well as ancillary covers and leasing related risks. The Company's business is predominately sourced from within the LeasePlan group.

The Company's business is well diversified geographically, both between countries and within countries. As a result, few underwriting risk concentrations exist. The Company's premium and reserve risk is well diversified across all European regions. A risk concentration does exist in relation to natural catastrophe risk due to the nature of the Company's business operations. When reinsurance is considered, this risk concentration is largely mitigated. Thereafter, a modest level of diversification exists between product lines. The main product sold by the Company is motor third-party liability insurance (LOB 4). This is reflected in the underwriting charge being driven largely by the capital requirement on LOB 4. Concentration of risk is also mitigated through reinsurance.

c) Risk Mitigation

The Company's Risk Management System and related policies set out the techniques used by the Company to manage and mitigate the risk to which it is exposed. The Company uses its program of risk assessments, risk appetite monitoring and risk governance via risk committees and the Board Risk Committee to monitor the continued effectiveness of these risk mitigation techniques.

The risk mitigation techniques used by the Company to mitigate underwriting risk are set out in the Company's Underwriting Risk Policy. These include the operation of risk selection and pricing procedures, the operation of an Underwriting Committee, underwriting authorities, reinsurance,

underwriting exposure limits, escalation procedures, and reporting, including to the control functions of the Company.

In addition, reinsurance is purchased to reduce and contain the volatility of results. The level of retention in different reinsurance contracts is aligned with the size and the risk profile of the underlying portfolios. This includes taking account of the cost of reinsurance on the one hand and the risk that is retained on the other. Risk that is retained is constrained through pre-defined limits as set by the Underwriting Committee.

The Company's underwriting risk appetite and underwriting key risk indicators are used by the Underwriting Committee, the Risk Committee and the Board Risk Committee to monitor the ongoing effectiveness of these risk mitigation techniques. The Underwriting Function undertakes an underwriting process level risk and control self-assessment. In addition, the Company's Business Controls Function (second line of defence) and Internal Audit Function (third line of defence) review and audit the effectiveness of the Company's underwriting processes.

d) Risk Sensitivity

A number of sensitivity analyses are used to assist the Company in understanding its exposure to the volatility of the Company's more material risks. These sensitivity analyses on the Company's key risk exposures help identify and quantify risks and help inform the Company's decision-making process.

The following sensitivity analysis is carried out in relation to underwriting risk:

- Expected loss ratios are a key assumption in the estimate of ultimate losses. As at 31 December 2022, sensitivity analysis shows that an increase of 2.5% in the loss ratios used in the calculation of the premium component of the technical provisions would result in a decrease in the SCR charge of €941k. In terms of SCR coverage ratio, the ratio is the same, largely due to the reduction in Own Funds.

The above sensitivity analysis would have the following impact on the Company's Solvency metrics:

Scenario	Own Funds (€000s)	Solvency Capital Requirement (SCR) (€000s)	Solvency Coverage Ratio
Base scenario	311,569	121,018	257%
Increase in loss ratios of 2.5%	308,686	120,078	257%

In addition, underwriting related stresses are included in a number of the Company's ORSA scenarios. This process helps the Company stress its underwriting risk exposure over the business planning period including in combination with other stressed risk exposures.

2. Market Risk

a) Risk Exposure

The Company's exposure to market risk is predominately in relation to its investments. The Company's investments at the reporting date totalled €552m. The Company's investments are predominately bank deposits. As at 31 December 2022, the Company held €497.6m in deposits. Deposits with a term of 8 days or more are subject to interest rate risk. The Company holds minor quantities of non-euro currencies for matching purposes. These are subject to foreign exchange risk.

As at 31 December 2022, the Company held €54.4m in both sovereign and corporate bonds with durations of between 1 and 5 years. As all bonds held by the Company are denominated in Euro, they are not subject to currency risk.

The Company's Investment Risk Policy sets out the Company's processes for the management of market risk. Investment risk forms part of the Company's Finance Function process-level risk and control self-assessment through which the risk is assessed, monitored and reported.

As at 31 December 2022, the Company had a market risk charge under the SCR of €32.2m. The Company's market risk charge is based on the Company's investments in term deposits i.e., deposits with terms of 8 days or more and its bond holdings. The market risk charge captures currency, spread and interest rate risk, along with the Company's concentration risk exposure to certain credit institutions. In accordance with IFRS 16, it also includes a property charge in relation to the lease asset included on the balance sheet.

b) Risk Concentration

The aim of the Company's Asset Liability Management Policy is to select assets that are matched to total liabilities (as far as possible) by currency, duration and by suitable type (predominately deposits). The Company is therefore exposed to concentration risk by product (deposit) and by currency (and therefore geographical area).

Due to the Company's conservative investment policy i.e., restricted primarily to deposits, risk concentrations exist in that the bulk of the Company's asset holdings are with a small number (<10) of highly rated external financial institutions and LeasePlan Corporation. The Company monitors these risk concentrations on an ongoing basis. This is reflected in the Company's Market and Counterparty Risk SCR charges (dependent on the duration of the bank deposit). No other material risk concentrations exist within market risk as the Company has exposure to many currencies and rebalances its exposures monthly.

c) Risk Mitigation

The Company's Risk Management System and related policies set out the techniques used by the Company to manage and mitigate the risk to which it is exposed. The Company uses its programme of risk assessments, risk appetite monitoring and risk governance via management risk committees and the Board Risk Committee to monitor the continued effectiveness of these risk mitigation techniques.

Market Risk is the risk of loss resulting directly or indirectly from fluctuations in the level of the market price of assets, liabilities and financial instruments. The risk mitigation techniques used by the

Company to mitigate market risk are set out in the Company's Investment Risk Policy. These include the following:

- Adopting a conservative approach to investments;
- Holding investments of sufficient amount, duration and liquidity to ensure all liabilities are met as they fall due; and
- Ensuring that there are appropriate policies, strategies and procedures in place to meet these objectives.

The Company's assets have been invested in accordance with the prudent person principle. The Company has placed the funds that support the claims reserves with external institutions with an S&P rating of investment grade or higher. In addition, the Company applies the prudent person principle in deciding the appropriate level of deposits and bonds to place with LeasePlan group.

The continued effectiveness of the Company's risk mitigation techniques for market risk is monitored by the Company's Investment Committee in accordance with the Company's Investment Risk Policy and the Investment Committee Terms of Reference. In addition, the Company's investment risk metrics are used by the Non-Insurance Risk Committee and the Board Risk Committee to monitor the ongoing effectiveness of these risk mitigation techniques.

d) Risk Sensitivity

A number of sensitivity analyses are used to assist the Company in understanding its exposure to the volatility of the Company's more material risks. These sensitivity analyses on the Company's key risk exposures help identify and quantify risks and help inform the Company's decision-making process.

The following sensitivity analysis was carried out in relation to market risk:

- As at 31 December 2022, sensitivity analysis shows that an increase in interest rates using EIOPA shock up yield curves would result in a decrease in the SCR of €5.9m, and a decrease in interest rates using EIOPA shock down yield curves would result in an increase in the SCR of €125k.

The above sensitivity analysis would have the following impact on the Company's Solvency metrics:

Scenario	Own Funds (€000s)	Solvency Capital Requirement (SCR) (€000s)	Solvency Coverage Ratio
Base scenario	311,569	121,018	257%
Interest rates shock up	321,426	115,148	279%
Interest rates shock down	302,929	121,143	250%

3. Credit Risk

a) Risk Exposure

Credit risk is the risk that the Company is exposed to lower returns or loss if another party fails to perform its financial obligations to the Company. The Company is subject to credit risk but the majority of this is in relation to LeasePlan group entities as policyholders, mediators or claim handlers. The Company is exposed to credit risk in the following key areas:

- Amounts due from institutions in respect of deposits placed;
- Reinsurers' share of insurance liabilities;
- Amounts due from reinsurers in respect of claims already paid;
- Amounts due from policyholders;
- Funds held by claim handlers;
- Cash at bank; and
- The Company's bond portfolio.

The Company's main non-LeasePlan credit risk is in relation to reinsurers, the banks in which it places deposits and its portfolio of sovereign and corporate bonds. As all sovereign bonds held are issued by EEA countries, they are not subject to a credit risk charge. The Company's non-LeasePlan deposits and corporate bonds are with counterparties with a Standard & Poor (S&P) rating of investment grade or higher. There were no material changes to the Company's credit risk exposure during the reporting period. The Company had no deposits with credit institutions that were subject to recapitalisation type intervention post year-end 2022.

As at 31 December 2022, the Company had a Counterparty Default risk charge under the SCR of €17.4m. The Company's Counterparty Default risk charge relates to the risk that counterparties do not meet their obligations as they fall due. This includes exposure to banks, reinsurers, policyholders, claim handlers and intermediaries. It excludes any exposures to counterparties already considered under market risk i.e. bond holdings and longer-term bank exposures.

b) Risk Concentration

There is potential for concentration of risk through the Company's exposure to banks in which it places its deposits and, to a lesser extent, to reinsurers. In relation to its exposure to banks, the Company has counterparty risk limits in place which restrict exposure with any one bank. In order to avoid concentration risk with reinsurers, the Company has limits in place which restrict the maximum share held by reinsurer and by credit rating. On a quarterly basis, a report is prepared and distributed to the Board of Directors and the Risk Committee outlining the current credit rating of reinsurers, along with other monitored factors such as share of reinsurance exposure, outlook and ownership structure.

Due to the Company's conservative investment policy, i.e. restricted primarily to deposits, risk concentrations exist in that the bulk of the Company's asset holdings are with a small number (<10) of highly rated external financial institutions and LeasePlan Corporation. The Company monitors these risk concentrations on an ongoing basis. This is reflected in the Company's Market and Counterparty Risk SCR charges (dependent on the duration of the bank deposit). No other material risk concentrations exist within market risk as the Company has exposure to many currencies and rebalances its exposures monthly.

c) Risk Mitigation

The risk mitigation techniques used by the Company to mitigate credit risk are set out mainly in the Company's Reinsurance and Investment Risk policies. The Company manages its credit risk exposure by monitoring and managing the levels of exposure to each counterparty and by monitoring the S&P rating of all assets to ensure the Company's investments are in secure assets of a high quality.

The continued effectiveness of the Company's risk mitigation techniques for credit risk is monitored by the Company's risk committees. In addition, the Company's credit risk appetite is used by the Non-Insurance Risk Committee and the Board Risk Committee to monitor the ongoing effectiveness of the above risk mitigation techniques.

d) Risk Sensitivity

A number of sensitivity analyses are used to assist the Company in understanding its exposure to the volatility of the Company's more material risks. These sensitivity analyses on the Company's key risk exposures help identify and quantify risks and help inform the Company's decision-making process.

The following is the sensitivity analysis carried out in relation to credit risk:

- As at 31 December 2022, sensitivity analyses show that a downgrade of 1 credit quality step (as stipulated in Solvency II calibration) of the bank with whom the Company holds the majority of cash balances would result in an increase in the SCR of €2.3m.

The above sensitivity analysis would have the following impact on the Company's Solvency metrics:

Scenario	Own Funds (€000s)	Solvency Capital Requirement (SCR) (€000s)	Solvency Coverage Ratio
Base scenario	311,569	121,018	257%
Downgrade of 1 credit quality step of largest bank	311,569	123,320	253%

In addition, credit risk related stresses are included in a number of the Company's ORSA scenarios. This process helps the Company stress its credit risk exposure over the business planning period including in combination with other stressed risk exposures.

4. Liquidity Risk

a) Risk Exposure

As the Company's investments are predominately held in short-term bank deposits, it is subject to limited liquidity risk. The Company's Liquidity Risk Policy and Asset Liability Management Policy set out the Company's processes for the management of liquidity risk. Liquidity risk forms part of the Company's Finance Function's process-level risk and control self-assessment through which, together with the related risk appetite statement, the risk is assessed, monitored and reported. There were no material changes to the Company's liquidity risk exposure during the reporting period.

The Company has invested a portion of its total investments in bonds purchased with remaining durations of up to 5 years. While these bonds are somewhat less liquid, they represent a small portion of total investments.

b) Risk Concentration

Risk concentrations in relation to liquidity risk can arise in a number of ways:

- **Risk concentration in product type:** Whilst the Company has in recent years increased its investment in its portfolio of corporate and sovereign bonds, the Company's investments remain primarily in term deposits. Therefore, the Company does have a concentration in terms of product type. This concentration does not impact the Company's ability to generate cash in times of stress, as the asset classes employed are quite liquid.
- **Risk concentration in maturity:** As the Company short matches assets to cover some longer tail technical reserve payments there exists a certain level of concentration in shorter maturity assets. However, this is a prudent policy with respect to liquidity and is aligned to LeasePlan Corporation group policy. In addition, the Company has minimum acceptable credit ratings (investment grade or higher) and concentration risk limits in place which set the maximum allowable exposure by credit institution.
- **Risk concentration in provider:** This can arise as a result of dependency on a few providers of liquidity stemming from concentrated counterparty default risk. The Company has counterparty risk limits in place which restrict the concentration risk with any one counterparty.

The Director of Finance, in conjunction with the Investment Committee, ensures the following:

- That the concentration limits to asset classes and individual counterparties are subject to review on a monthly basis and any increases are proposed to the Board for approval;
- That active monitoring and management of concentration risk is undertaken, including an analysis of possible contagion; and
- That asset concentration trends are analysed to identify adverse impacts on the Company and that appropriate remedial action is taken.

The monitoring of liquidity concentration risk limits is outlined in further detail in the following section (Risk Mitigation).

c) Risk Mitigation

The Company's Risk Management System and related policies set out the techniques used by the Company to manage and mitigate the risks to which it is exposed. The Company uses its programme of risk assessments, risk appetite monitoring and risk governance via management risk committees and the Board Risk Committee to monitor the continued effectiveness of these risk mitigation techniques.

Liquidity risk is the risk that the Company is unable to realise investments and other assets in order to settle its financial obligations when they fall due. The purpose of liquidity risk management, as part of an overall investment risk strategy, is to ensure there are appropriate practices to provide sufficient liquidity over the short, medium and long term.

The risk mitigation techniques used by the Company to mitigate Liquidity Risk are set out in the Company's Liquidity Risk Policy. These include the following:

- The Finance Function reviews the Company's cash balance daily and weekly to monitor liquidity positions. This includes determining the level of mismatch between the cash inflows and the cash outflows of both assets and liabilities and expected cash flows from insurance and reinsurance to determine the total liquidity needed in the short term, including an appropriate buffer for any potential liquidity shortfall.
- In addition, the Finance Function performs daily monitoring of the Company's bank accounts. The Company prepares for any unusual cash flow movements by holding funds to cover payments for 3 months (excluding receipt of premium) in call accounts (overnight) and short-term deposits that mature in less than 90 days.
- The Company short matches assets to cover some longer tail technical reserve payment requirements.

As at 31 December 2022, the Company included an asset equal to €43.4m (€36.0m at YE 2021) in Solvency II Own Funds that related to Expected Profits in Future Premiums ("EPIFP"). This has been calculated in accordance with Article 260(2) of Solvency II. As this asset relates to profits embedded in 2023+ contracts, the emergence of these profits is expected to occur during 2023 (and possibly later years). Given the nature of this asset, it is not a liquid asset that can, for instance, be used to pay claims. This is not a concern for the Company given the very liquid nature of the Company's portfolio of "investible" assets where the bulk of these assets are held in highly liquid bank deposits.

The continued effectiveness of the Company's risk mitigation techniques for liquidity risk is monitored by the Company's Investment Committee, in accordance with the Company's Investment Risk Policy and Investment Committee Terms of Reference. In addition, the Company's investment risk appetite is used by the Non-Insurance Risk Committee and the Board Risk Committee to monitor the ongoing effectiveness of these risk mitigation techniques.

d) Risk Sensitivity

As discussed above, the Company is exposed to minimal liquidity risk due to the nature of its investments. The Company also short matches assets to cover some longer tail technical reserve

payments, which is a prudent policy with respect to liquidity. Liquidity risk forms part of the Finance Function's process-level risk and control self-assessment through which, together with the related risk metrics, the risk is assessed, monitored and reported. Liquidity risk is not an influential driver of the Company's Solvency Coverage Ratio and as such, the Company does not carry out sensitivity analyses on this risk.

5. Operational Risk

a) Risk Exposure

The Company is exposed to operational risk arising from operations conducted in-house and from operations which it has outsourced. The Company's Operational Risk Policy sets out the Company's processes for the management of operational risk. The Company uses risk appetite statements, risk metrics and key risk indicators and a programme of operational risk monitoring and business continuity management to assess and monitor operational risk.

The Company, through its entity level risk assessment and, in particular, through its various process-level risk and control self-assessments, assesses, monitors and reports upon operational risk. The Company monitors performance against key risk indicators for operational risk in its Non-Insurance Risk Committee. There were no material changes to the Company's operational risk exposure during the reporting period.

As at 31 December 2022, the Company had an operational risk charge under the SCR of €7.9m. This relates to the risk associated with the people, processes and systems involved in the running of the Company.

b) Risk Concentration

The Company does not have a risk concentration relating to operational risk. The potential for concentration risk is continuously managed and monitored using the risk management techniques outlined in the section below.

c) Risk Mitigation

The Company's Risk Management System and related policies set out the techniques used by the Company to manage and mitigate the risks to which it is exposed. The Company uses its programme of risk assessments, risk appetite monitoring, key risk indicators and risk governance via risk committees and the Board Risk Committee to monitor the continued effectiveness of these risk mitigation techniques.

Operational risk is the risk of a positive, negative or potential loss resulting from inadequate or failed internal processes, human behaviour and systems or from external incidents. The risk mitigation techniques used by the Company to mitigate operational risk are set out in the Company's Operational Risk Policy. These include risk identification, the conduct of entity level and process level risk assessments, the implementation of appropriate risk responses following assessment, risk monitoring, operational risk appetite statement setting and reporting.

The Company operates an operational risk incident monitoring process and categorises incidents into the following categories:

- Internal Fraud;
- External Fraud;
- Employment Practices and Workplace Safety;
- Clients, Products & Business Practices;
- Damage to Physical Assets; and
- Execution, Delivery & Process Management.

In addition, the Company's Business Continuity Management and Information Security functions seek to mitigate operational risk in their respective areas.

The continued effectiveness of the Company's risk mitigation techniques for operational risk is monitored by the Company's risk committees. In addition, the Company's operational risk appetite is used by the Non-Insurance Risk Committee and the Board Risk Committee to monitor the ongoing effectiveness of the above risk mitigation techniques.

d) Risk Sensitivity

While operational risk requires ongoing vigilance, it is not, by itself, a substantial risk for the Company. Accordingly, while no specific risk sensitivity is provided here for same, during the Company's ORSA process, a qualitative assessment of material operational risks is carried out, as well as a quantitative assessment of the impact of a large operational loss on the Company. The impact of this operational loss scenario within the Company's ORSA process was to reduce the Own Funds as a result of a decrease in profit. This did not have a material impact on the Company's Solvency Coverage Ratio. This process helps the Company stress its operational risk exposure over the business planning period including in combination with other stressed risk exposures.

6. Any other material risks

As part of the Company's regular ORSA process, the overall risk profile and the associated capital needs are assessed against the Company's actual solvency capital position. The most important risks to which the Company is exposed, including risks that are not incorporated into the standard formula, are identified through a combined top-down and bottom-up risk assessment process. The following risks, outside the scope of the standard formula, are recognised by the Company as requiring ongoing vigilance:

- Cyber Risk;
- Sustainability and climate change;
- Group Risk;
- Strategic Risk; and
- Reputational Risk.

a) Cyber Risk

With the increased dependency on digital systems and digital data storage within the insurance industry and within the Company, there is an increased cyber security risk of malicious data theft and service disruption. For this reason, the Company operates, in addition to first line IT, an Information Security Function within the second line of defence. The Information Security Function monitors 14 risk profile domains related to information security risk. These domains cover the core elements of cybersecurity, including:

- a) Application security;
- b) Information and data security;
- c) Network security;
- d) Business continuity planning; and
- e) Ongoing end-user education.

Performance in relation to each information security domain, including the required periodic activities per domain, is monitored by management and the Board Risk Committee.

b) Climate Change

As a LeasePlan group company, the Company adopts and aligns to LeasePlan's Driving to Zero sustainability strategy. The Company is committed to protecting the planet by reducing its environmental impact and helping tackle climate change. As the LeasePlan group insurer, the Company's strategy is to insure LeasePlan's growing fleet of electric vehicles and help LeasePlan lead the transition to zero emissions mobility. The Company's underwriting and pricing processes continue to respond to the evolving risk profile of electric vehicles in the Company's markets. The Company continues to integrate climate-related and environmental risks into its governance and risk management processes. The Company is committed to contributing to societal wellbeing by helping

create a more equal and inclusive society and is committed to being responsible by and winning and retaining the trust of its stakeholders by conducting business according to high ethical standards.

Due to the nature of the risks insured by the Company, namely risks associated with moveable assets in the form of vehicles located across multiple jurisdictions, the Company's direct exposure to climate and environmental risks is limited. However, as the Company underwrites Motor Catastrophe (e.g. flood and hail) insurance increased frequency and/or severity of claims under this cover is considered to be the Company's main climate change-related underwriting exposure. The Company maintains reinsurance in respect of this cover. During 2022, the Company undertook Motor Catastrophe modelling with the support of a market-leading climate modelling provider. This modelling helped, and continues to help, the Company identify appropriate Motor Catastrophe reinsurance structures and appropriate levels of retained risk. In relation to investments, due to the nature of the Company's predominately bank deposit investment portfolio, the Company has limited climate and environmental transition risk on its investments. Climate change risk is assessed in the Company's risk assessment and ORSA processes.

c) Group Risk

The Company is heavily dependent on the wider LeasePlan group for many of its policyholders, mediators, claim handlers, some investments and for its sales channel. Group risk is assessed in the Company's corporate risk register and managed through a number of controls. The Company's ORSA includes stress scenarios in relation to group risk.

d) Strategic Risk

Strategic risk is the risk to the Company's earnings/capital due to adverse business decisions, improper implementation of decisions or lack of responsiveness to changes in the business environment.

Strategic risk is assessed in the Company's corporate risk register and is managed through a number of controls. The Company's ORSA stress testing process includes a strategic risk component through the inclusion of a reverse stress test which assesses the impact of premium growth.

e) Reputational Risk

Reputational risk is the risk to the Company's earnings/capital due to an adverse perception of the image of the Company on the part of clients, counterparties, shareholders, investors and regulators.

Reputational risk is included in the Company's corporate risk register. The Company operates a risk metric for reputational risk which is monitored regularly and which is included in the Company's risk reporting process.

The Company also has specific controls in place to limit reputational risk exposure such as the Company's Code of Conduct and related staff training, the Company's culture and conduct risk indicators and contractual agreements with outsourced service providers which set out expectations in relation to ethical behaviour, honesty and integrity.

D Valuation for Solvency Purposes

1. Assets

This section contains information regarding the valuation of the balance sheet items. For each material asset class, the bases, methods and main assumptions used for Solvency II purposes are outlined.

The following table analyses the Company's financial assets at 31 December 2022:

	Assets as at 31 December 2022	
	Solvency II Value €'000	Statutory Accounts Value €'000
Deferred acquisition costs		2,930
Property, plant & equipment held for own use	2,145	2,264
Bonds	51,743	54,843
Deposits other than cash equivalents	368,384	70,168
Reinsurance recoverables from:	18,846	30,674
<i>Non-life excluding health</i>	13,494	25,296
<i>Health similar to non-life</i>	-1	-1
<i>Life excluding health and index-linked and unit-linked</i>	5,353	5,379
Insurance and intermediaries receivables	47,274	107,497
Reinsurance receivables	0	0
Receivables (trade, not insurance)	410	410
Cash and cash equivalents	185,185	483,208
Total assets	673,987	751,994

Valuation of most financial assets is based on amortised cost for statutory purposes. In the paragraphs below, the valuation methodologies are described:

Deferred acquisition costs

Deferred acquisition costs are the amount of an insurer's acquisition costs incurred as premium is written but earned and expensed over the term of the policy. The unearned portion is capitalized and recognized as an asset on the insurer's balance sheet. However, for Solvency II purposes deferred acquisition costs of €2.9m are excluded from the valuation of assets.

Property, plant & equipment held for own use

Property, plant & equipment are valued at net book value for statutory purposes. Property, plant and equipment includes €2.1m of right-of-use assets relating to leased assets. For Solvency II valuation purposes, computer software tailored to the needs of the undertaking, that cannot be sold to another user, shall be valued at nil.

Bonds

The Company holds a mixture of corporate and sovereign bonds. The bonds are valued based on market value under Solvency II and on an amortised cost basis under IFRS, with an IFRS 9 adjustment for Expected Credit Loss. These differing treatments account for the difference in valuation between Solvency II and Statutory accounts value.

Deposits other than cash equivalents

Deposits other than cash equivalents are valued at fair value by the relevant financial institution, and the Company receives monthly statements at the period end to confirm the balances held. The categorisation of deposits and cash and cash equivalents is different between IFRS and Solvency II.

The difference between the Solvency II valuation and IFRS valuation of deposits other than cash equivalents, is the IFRS 9 adjustment for Expected Credit Loss. While accrued interest is excluded under IFRS, it is included under Solvency II.

Reinsurance asset

The reinsurance asset relates to the amounts that can be collected from reinsurers. The value of the asset is estimated using a method that is in line with the reinsurance contract for IFRS purposes. This balance is adjusted for the IFRS 9 Expected Credit Loss and then adjusted for Solvency II purposes for the expected default of the reinsurer and discounting.

The Company has claims that have been settled via court awarded Periodic Payment Orders (“PPOs”) that provide regular payments to claimants until death. As such, these obligations have been valued using life actuarial techniques and the related reinsurance recoveries have been re-classified as a Life Reinsurance Asset.

Insurance and intermediaries’ receivables

Insurance and intermediaries’ receivable balances represent premiums due from policyholders. The Company has existing contracts at the valuation date (31 December) with associated premiums which are not due to be paid until after the valuation date. The future premiums are treated as debtors for IFRS reporting. A creditor is set up for the associated future commission payments. However, for Solvency II purposes, the premiums and commission are a future cashflow associated with an existing contract and, as such, they form part of the technical provisions. At 31 December 2022, the amount of future premium is approximately €39.7m. This is included as a reduction in technical provisions.

Cash and cash equivalents

Cash and cash equivalents are valued at fair value by the relevant financial institution, and the Company receives monthly statements at the period end to confirm the balances held. The categorisation of deposits and cash and cash equivalents is different between IFRS and Solvency II.

The difference between the Solvency II valuation and IFRS valuation of cash and other than cash equivalents is the IFRS 9 adjustment for Expected Credit Loss.

2. Technical Provisions

a) Technical Provisions Basis, Methods and Assumptions

The following section outlines the approach, general methodology and components of the Company's Technical Provisions. The two main components of the Technical Provisions are the best estimate provision and the risk margin. There are several distinct provisions that feed into the overall best estimate provision.

Provision for Claims Outstanding: The provision for claims outstanding covers cashflows related to all claim events which occur before or at the valuation date. The cashflows projected comprise of:

- Outstanding claims / Case reserves;
- Incurred but not reported claims;
- Incurred but not enough reported claims; and
- Premiums earned but yet to be received and commission earned but yet to be paid.

The Company makes use of the below standard techniques in order to arrive at an estimation of the ultimate level of claims:

Development Factor Method ("DFM")

- For this method, the Company assumes that for a particular accident period, the proportion of the ultimate claims, which has developed by each period, follows past trends.
- A set of assumed development factors is derived. The development factors are typically calculated as a weighted average of past accident periods. More recent accident periods generally receive a higher weighting.
- Projections are carried out on past claims data using the development factors that have been determined.
- The DFM is applied to both paid and incurred claims to produce both paid and incurred ultimate claims estimates.

Loss Ratio Method

- For this method, a projected loss ratio for a particular accident period is estimated by reference to an older, more developed period.
- By applying the projected loss ratio to a known earned premium, ultimate claims are estimated for the relevant accident period.

Burning Cost Method

- For this method, ultimate claims are arrived at by considering the ultimate cost of claims per unit of exposure.
- The ultimate burning cost for past periods is assessed in order to arrive at an estimate of ultimate claims for more recent accident periods.
- The past estimates used may or may not be adjusted for seasonal and / or inflationary effects.
- This method can be useful for more recent accident periods, avoiding an over reliance on underdeveloped notified claims data.

The company considers the appropriateness of the above methodologies separately by Solvency II line of business and by accident year. The selection of the most appropriate method is based on expert judgement which considers among other factors, the quantity, quality and reliability of the available data, and analyses all important characteristics of the business. Appropriate consideration was given to potential distortions in claims patterns during 2020 through 2022 arising from the Covid 19 pandemic.

Claims Handling: The Company holds a provision for future claims handling expenses associated with the future processing of claims for accident periods up to the valuation date. The Company's Actuarial Department assesses an appropriate provision to cover the cost of settling current and future claims arising from insurance business written to the end of the relevant accounting period. It should be noted that for a proportion of the Company's risks, claims are managed by other parties and charged on a "per event" or equivalent basis.

Premium Provision: To calculate the premium provision a forward-looking combined ratio estimate is applied to the Company's unexpired premium. The ratio applied includes estimates of claims handling costs and administration expenses. The claims ratio is based on realistic expectations of future claims and considers future expected premium rates. The premium provision is net of premiums which are yet to be received for unexpired risk. Premium provision calculations are completed by the actuarial department in conjunction with the finance department. The estimation covers all programmes and all claim types.

Events Not In Data ("ENIDs"): The approaches used by the Company to arrive at a best estimate of ultimate claims allow for the historic level of uncertainty in the past claims data. In order to allow for the uncertainty regarding events that the Company believes are not yet present in past data, the Company makes an explicit allowance for ENIDs. These are events which could occur but are not yet apparent in the Company's historic claims data. Examples include provisions to allow for higher-than-expected future inflation, risks associated with increased coverage of Electric Vehicles and provisions to guard against catastrophic events resulting from climate change.

Reinsurance: The Company has (non-proportional) reinsurance in place to protect against large individual motor third-party liability claims. The Company also has reinsurance in place to protect against accumulations of risk related to motor property damage claims, e.g. from catastrophic weather events.

To calculate net technical provisions, the Company's reinsurers' share of claims is subtracted from claims provisions.

The Company's reinsurance cover is placed with a variety of third party reinsurers with strong credit ratings. The Company currently has no balances in dispute with respect to third party reinsurance recoveries.

Discounting: As per the Solvency II requirements, the Company discounts the run-off of the premium provision and the provision for claims outstanding in order to arrive at the Solvency II technical provisions. The pattern for the run-off of the premium provision and the provision for claims outstanding is arrived at using historic payment development trends. The discounting of the cashflows associated with the premium provision and provision for claims outstanding is performed using discount rates that are no higher than the relevant risk-free interest rates that are published by the European Insurance and Occupational Pensions Authority ("EIOPA").

Risk Margin: The approach taken by the Company for the Risk Margin calculation is Simplification 2 - essentially the most detailed approach that can be used by a "Standard Formula" insurer. In this, the Non-Life and Health Underwriting risk charges are explicitly recalculated based on the projected run-off of the Technical Provisions ("TPs"). The Life Underwriting risk is run-off in relation to the expected run-off of the underlying claims. All the risk charges for all risk at future points in time are estimated based on the run-off of the total technical provisions. The Company uses EIOPA's prescribed cost of capital of 6% and applies this to the future SCR estimates. Discounting is performed for each future time period using EIOPA's prescribed yields. These calculations then arrive at the Company's risk margin.

This approach was chosen in light of the need for separate cashflow modelling, given the co-existence of both short-term and long-term liabilities.

Summary of Technical Provisions Results: The Company's overall gross and net technical provisions are illustrated in the exhibit below:

GROSS		LPINS Technical Provisions at 31 Dec 2022 (€'000)		
Line of Business	Provision for Claims Outstanding	Premium Provision	Risk Margin	Total
Income protection insurance	11,005	(4,353)	746	7,398
Motor vehicle liability	218,085	(20,537)	14,774	212,322
Other motor	40,561	(6,029)	2,748	37,280
Fire & other damage to property insurance	97	(167)	7	(63)
Legal expenses	1,042	(566)	71	547
Assistance	644	(1,058)	44	(370)
Miscellaneous financial loss	3,922	(6,950)	266	(2,762)
Annuities from non-life contracts	5,469	0	618	6,087
Proportional non-life reinsurance - other motor insurance	1,071	0	73	1,144
Total	281,896	(39,660)	19,347	261,583

NET		LPINS Technical Provisions at 31 Dec 2022 (€'000)		
Line of Business	Provision for Claims Outstanding	Premium Provision	Risk Margin	Total
Income protection insurance	11,005	(4,353)	746	7,398
Motor vehicle liability	201,487	(15,875)	14,774	200,386
Other motor	37,698	(5,224)	2,748	35,222
Fire & other damage to property insurance	97	(167)	7	(63)
Legal expenses	1,042	(566)	71	547
Assistance	644	(556)	44	132
Miscellaneous financial loss	3,922	(6,950)	266	(2,762)
Annuities from non-life contracts	115	0	618	733
Proportional non-life reinsurance - other motor insurance	1,071	0	73	1,144
Total	257,081	(33,691)	19,347	242,737

The below table compares the gross and net technical provisions as at 31 December 2022 to the position as at 31 December 2021:

	LPINS Technical Provisions (€'000)		
	As at 31 Dec 2022	As at 31 Dec 2021	Difference
Gross Technical Provisions	261,583	283,630	(22,047)
Net Technical Provisions	242,737	254,614	(11,877)

There is a decrease of €22.0m in the gross and a decrease of €11.9m in the net technical provisions between 31 December 2021 and 31 December 2022. The divergence between the gross and net movements in overall technical provisions is largely explained by catastrophe events and specific large claims experience during the year leading to an increase in the Company's reinsurance assets. The Company benefited from a year-on-year reduction in gross and net technical provisions due to a higher level of discounting of future claim payments.

b) Level of Uncertainty associated with the amount of Technical Provisions

The Company's best estimate calculations seek to represent close to the 50th percentile of estimates for the Company's claims liabilities. The best estimate arrived at is the probability weighted estimate of future claims and expenses. As the best estimate is itself an estimate, there is a level of uncertainty associated with this amount.

In terms of quantifiable elements of uncertainty, the main elements include discount rates, loss ratio assumptions for exposure beyond the valuation date and lapse rates.

The table below shows the results of the stress tests carried out on the technical provisions:

Scenario	Net TPs excluding Risk Margin (€'000)	Relative Change from Base Scenario
Base scenario	223,390	
EIOPA Shock Up Interest Rates	211,194	-5.5%
EIOPA Shock Down Interest Rates	234,774	5.1%
Increase in FX rates of 10%	224,965	0.7%
Increase in loss ratios of 2.5%	228,676	2.4%
Increase in loss ratios of 10%	244,556	9.5%
Increase of Lapse Rates absolute by 1%	224,025	0.3%
Increase of Lapse Rates absolute by 5%	226,566	1.4%

- **Interest Rate Risk**

Applying the EIOPA shock up yield curve reduces the technical provisions by 5.5% and applying the EIOPA shock down yield curves increases the technical provisions by 5.1%. Being a non-life insurer with relatively short-term liabilities and a short asset-side duration, the Company has a low exposure to reductions in interest rates.

- **Currency FX Rate Sensitivity**

A strengthening of foreign currency rates against the Euro resulted in an increase in the technical provisions of 0.7%. As it is the Company's Investment Policy to broadly match assets with liabilities in terms of currency, the Company does not have material exposures to changes in currency rates.

- **Loss Ratio Sensitivity**

An increase in the loss ratio assumptions of 2.5% results in a 2.4% increase in the technical provisions. If the loss ratios of individual programmes are increased by 10%, this results in an 9.5% increase in technical provisions.

- **Lapse Rate Sensitivity**

Two lapse rate scenarios were considered. An increase in the lapse rate assumption of 1% results in a 0.3% increase in the technical provisions, while an increase of 5% would increase technical provisions by 1.4%.

Additional sources from which uncertainty could potentially arise are as follows:

Events Not In Data ("ENIDs"): The approaches used by the Company to arrive at a best estimate of ultimate claims allow for the historic level of uncertainty in the past claims data. In order to allow for the uncertainty regarding events that the Company knows are not yet present in past data, the Company has a specific provision for ENIDs.

Premium Provision: The premium provision is subject to additional uncertainty over and above that contained within the claims provision in that it contains cost estimates for events that have not yet occurred. Particularly at year-end, it must also contain an allowance for business bound in the main renewal season for the following year that is not yet recorded on the system, as well as premium contracted and on the system, but not yet received. These involve additional assumptions which increase the level of uncertainty, though this is mitigated to a certain extent by reasonableness checks.

c) Solvency II Best Estimate VS Financial Statement Reserves

The Company's Solvency II best estimate uses as a starting point the undiscounted, best estimate provisions that are included in the financial statements. Thereafter, a number of adjustments are applied to comply with Solvency II requirements (e.g. discounting is applied together with an ENID provision being held).

For financial statements, the Company holds an explicit risk margin for prudence / uncertainty consistent with industry practice and to satisfy the IFRS requirement of prudent reporting.

The Company's movement from IFRS reserves to Solvency II technical provisions is set out in the table below:

Total Technical Provisions - IFRS to Solvency II Movements (€'000)			
	Gross	Ceded	Net
IFRS Reserves	336,749	30,674	306,075
Total Solvency II Technical Provisions	261,583	18,846	242,737

d) Application of the Matching Adjustment

This guideline is not applicable to the Company as the Company does not use the matching adjustment.

e) Application of the Volatility Adjustment

This guideline is not applicable to the Company as the Company does not use the volatility adjustment.

f) Application of the Transitional Risk-Free Interest Rate-Term Structure

This guideline is not applicable to the Company as the Company does not use the transitional risk-free interest rate-term structure.

g) Application of the Transitional Deduction

This guideline is not applicable to the Company as the Company does not use the transitional deduction.

h) Recoverables from Reinsurance Contracts

The Company has reinsurance in place to protect against both large individual third-party liability claims and also accumulations of risk with regard to property damage.

The Company's reinsurance arrangements are taken into account in order to calculate net technical provisions for Solvency II. The Company complies with Solvency II regulation by adjusting claims recoveries due from reinsurers for expected reinsurer default together with discounting expected future reinsurance recoveries using an expected payment pattern relevant to such cashflows.

The exhibit below displays the Company's gross and net technical provisions, along with the Company's reinsurers' share of technical provisions:

Total Technical Provisions (€'000)			
	Gross	Ceded	Net
Total Solvency II Technical Provisions	261,583	18,846	242,737

3. Other Liabilities

This section contains information regarding the valuation of the balance sheet items. For each material liability class, the bases, methods and main assumptions used for Solvency II purposes are outlined.

The following table analyses the Company's financial liabilities at 31 December 2022:

	Other liabilities as at 31 December 2022	
	Solvency II Value €'000	Statutory Accounts Value €'000
Technical Provisions - non-life	248,099	357,807
Technical provisions - health (similar to non-life)	7,397	12,546
Technical Provisions - life (excluding unit linked and index linked)	6,086	6,024
Total Technical Provisions	261,583	376,377
Insurance and intermediaries' payables	88,140	94,608
Reinsurance payables	2,115	2,115
Payables (trade, not insurance)	10,580	5,718
Total liabilities	362,418	478,818
Excess of assets over liabilities	311,569	273,176

Valuation of most financial liabilities are based on fair value for statutory purposes. In the paragraphs below, the valuation methodologies are described.

Insurance & intermediate payables

The main differences between Solvency II and IFRS for insurance and intermediate payables are the reclassification of the non-technical (aggregate deductible) liabilities to the technical provisions where the aggregate deductible settlement period had been reached, and an amount of future commission of approx. €2.3m that is included as an increase in technical provisions.

Reinsurance payables

This balance reflects amounts owed to reinsurers in respect of reinsurance agreements in place. There are no differences between the Solvency II valuation and the IFRS valuation of reinsurance payables.

Payables (trade, not insurance)

The difference between Solvency II and IFRS for payables is due to the increase in the tax liability which results from the increase in the financial result included in the Company's own funds (excess of assets over liabilities) under Solvency II.

Please note the following:

- As the Company does not currently have a Deferred Tax Asset any movements on the revenue of the Company will have an impact on the tax creditor.
- The Company operates a defined contribution pension scheme. The pension charge represents contributions payable by the Company to the scheme. As at 31 December 2022, there are no outstanding contributions.
- The Company recognises operating leases with regards to office space and motor vehicles.
- The main drivers of the increase in Solvency II Own Funds are the strong financial result for 2022, the Written Not Yet Incepted (WBNYI) business for 2023 and the change in the assumptions on discounting partially offset by the dividend payment in August 2022.

4. Alternative Methods for Valuation

This section is not applicable to the Company as the Company does not use any alternative methods for valuation.

5. Any other information

The Company has no other disclosures to make in respect of the Company's Valuation for Solvency Purposes.

E Capital Management

1. Own Funds

a) Objectives / Policies / Processes for Managing Own Funds

The strategic objectives of capital management within the Company are:

- **Regulatory compliance:** To ensure compliance with the Company's regulatory capital requirements and in the case of adverse SCR levels, to set out the approach to recoverability including the consideration of capital relief measures and / or additional capital;
- **Liquidity:** To maintain sufficient liquidity to ensure the Company is able to meet its obligations in a timely manner and at a reasonable cost in accordance with the Company's Liquidity Risk Policy;
- **Efficient capital allocation:** To manage and allocate capital efficiently to achieve sustainable returns and facilitate growth objectives;
- **Financial strength:** To ensure access to capital markets on competitive terms, so that the company's overall cost of capital is minimised; and
- **Continuity of business:** All of the above objectives are consistent with the continuation of profitable business in line with Company Strategy.

Taken together, these strategic goals seek to strengthen the Company's ability to withstand losses from adverse business and market conditions, enhance its financial flexibility and serve the interests of the Company's stakeholders.

The Company strives to ensure that it maintains capital levels which are consistent with the Company's Risk Appetite Framework and the Company's Strategy, at both a point in time and on a forward-looking basis.

The Company's capital planning process aims to be dynamic and forward-looking in relation to the Company's risk profile and takes into account the output from the Risk Management System and the Own Risk and Solvency Assessment ("ORSA") as part of capital planning activities.

Capital planning activities shall involve taking into account current and anticipated changes in the Company's risk profile, such as those reflected in its business plan, and forecasting the related impact on capital. In addition, as part of its capital planning, the Company shall integrate projected capital needs with its business planning and financial forecasting processes.

As part of the ORSA process, Solvency II balance sheet projections are prepared with solvency requirements based on the strategy and business plan of the Company projected over a 5-year time horizon.

Responsibility for the on-going monitoring of the Company's Capital Management Policy has been assigned to the Company's Director of Finance, who, with the support of the Risk Function, Actuarial Department and Compliance Function performs an annual review to ensure that the Capital

Management Policy and the Capital Management Plan continue to be relevant to current and planned operations of the Company.

The Company's Capital Management Policy and the Capital Management Plan and Dividend Policy are monitored by the Audit Committee annually and presented to the Board for re-approval. The Company's SCR Assurance Process, which is designed to ensure that the Company complies with its capital requirements on an ongoing basis, forms part of the company's Capital Management Policy.

b) Own Funds by Tier

Under Solvency II Own Funds are classified into tiers and there are eligibility requirements / limits applicable to the tiers to cover the SCR and MCR.

At present, the Company has only Tier 1 capital, i.e. the highest quality of capital available.

The Company's Director of Finance is responsible for ensuring that the Own Funds items meet the Solvency II eligibility requirements and are classified correctly. The Director of Finance is also responsible for ensuring that the terms and conditions of any Own Fund item are clear and unambiguous in relation to the criteria of Solvency II.

Issuance of Own Fund items shall be in accordance with the Company's Capital Management Plan. As part of the business planning and ORSA processes, dividend payments and capital requirements shall be considered in conjunction with the Capital Management Plan.

The exhibit below outlines the Company's available Own Funds (by tier).

LPINS Own Funds (€'000)			
Available Own Funds		2022	2021
Share Premium, Issued Share Capital, Retained Earnings	Tier 1	300,764	248,024
	Tier 2	0	0
	Tier 3	0	0
Other own fund items approved by the supervisory authority as basic own funds not specified above	Tier 1	10,805	10,805
	Tier 2	0	0
	Tier 3	0	0
Total		311,569	258,829

c) Own Funds Eligible to Cover SCR

The exhibit below outlines the Company's Own Funds (by tier) which are available to cover the SCR:

LPINS Own Funds (€'000)			
Own Funds Eligible for SCR		2022	2021
Share Premium, Issued Share Capital, Retained Earnings	Tier 1	300,764	248,024
	Tier 2	0	0
	Tier 3	0	0
Other own fund items approved by the supervisory authority as basic own funds not specified above	Tier 1	10,805	10,805
	Tier 2	0	0
	Tier 3	0	0
Total		311,569	258,829

There has been no change in the quality of Own Funds available to cover the SCR, i.e. the Company only has Tier 1 capital. There was an increase of €52.7m in the amount of the Own Funds between 2021 and 2022. It is important to note that the improvement of the Company's capital position is due to strong financial results for 2022, change in the approach to discounting, together with the contribution from written but not yet incepted business for 2023 offset by the dividend payment in August 2022.

d) Own Funds Eligible to Cover MCR

The exhibit below outlines the Company's Own Funds (by tier) which are available to cover the MCR:

LPINS Own Funds (€'000)			
Own Funds Eligible for MCR		2022	2021
Share Premium, Issued Share Capital, Retained Earnings	Tier 1	300,764	248,024
	Tier 2	0	0
	Tier 3	0	0
Other own fund items approved by the supervisory authority as basic own funds not specified above	Tier 1	10,805	10,805
	Tier 2	0	0
	Tier 3	0	0
Total		311,569	258,829

The Own Funds available to cover the MCR are the same as those available to cover the SCR. Therefore, the reasons for the differences in amount, quality and structure of Own Funds between 31 December 2021 and 31 December 2022 are as per section c) above.

e) Differences between Equity in Financial Statements and Basic Own Funds

The Company's financial statements include a margin for prudence when calculating claims reserves. This margin is not included by the Company when calculating claims reserves for the purpose of the Solvency II Balance Sheet.

The table below outlines the Company's reconciliation reserve information:

LPINS Reconciliation Reserve (€'000)		
	2022	2021
Excess of assets over liabilities (A)	311,569	258,829
Other basic own fund items (B)	11,484	11,484
Total (A – B)	300,085	247,345

The reconciliation reserve increased by €52.7m during 2022. The main drivers for the increase are the financial results for 2022, together with the contribution from Written But Not Yet Incepted (WBNYI) business for 2023 and the change in the assumption on discounting offset by the dividend payment of €25m in August 2022.

The reconciliation reserve is essentially a formula driven number derived from the Solvency II balance sheet and any potential volatility in this reserve will be driven primarily by changes in the valuation of assets and the valuation of technical provisions and other liabilities (as discussed in Section D).

f) Own Funds Items subject to Transitional Arrangements

This guideline is not applicable to the Company as the Company does not have any Own Fund items that are subject to transitional arrangements.

g) Ancillary Own Funds

This guideline is not applicable to the Company as the Company does not have any ancillary Own Funds.

h) Restrictions on Own Funds

As required by the rules of the Portuguese Green Card Bureau, the Company has a charge in place over a designated bank account for the purposes of providing a guarantee required by that body. The Company maintains circa €600k in this designated bank account. In the event of strained capital circumstances, the Company cannot immediately draw upon this €600k and, as such, it represents a restriction to the Company's Own Funds.

2. Solvency Capital Requirement and Minimum Capital Requirement

a) Amount of SCR and MCR

The amounts of the Company's SCR and MCR are outlined below:

€'000	LPINS Capital Requirements
SCR	121,018
MCR	40,893

b) Amount of SCR by Risk Modules

The breakdown of the Company's SCR calculation by risk module is included in the table below. Please note that diversification benefit explains the summation of the individual components exceeding the overall requirement.

€'000	LPINS Capital Requirements
Market risk	32,178
Counterparty default risk	17,370
Non-life underwriting risk	98,583
Health underwriting risk	37,880
Operational risk	7,874
Life underwriting risk	131
LACDT*	(17,288)
Diversification	(55,710)
SCR	121,018

c) Simplified Calculations and / or Company Specific Parameters

This guideline is not applicable to the Company as the Company does not use any simplified calculations or company specific parameters.

d) Undertaking Specific Parameters (USPs) and / or Capital Add-Ons

This guideline is not applicable to the Company as the Company does not use USPs or have any capital add-ons.

e) Amount of Capital Add-Ons

This guideline is not applicable to the Company as the Company does not have any capital add-ons.

f) Inputs for MCR

The Company's MCR is calculated by using a straight-line formula which incorporates net TPs and net premiums written for the last 12 months.

The prescribed MCR calculation applies both an upper and lower bound. The upper bound is equal to 45% of the corresponding SCR, while the lower bound is set at 25% of the SCR.

g) Loss-Absorbing Capacity of Deferred Taxes (LACDT)

The SCR is reduced to allow for the benefit arising from the Loss Absorbing Capacity of Deferred Taxes [LACDT] in the event of the Company incurring a loss equal in value to the bSCR (Basic SCR excluding any tax relief). Were this to occur, this would crystallise a tax loss which could be carried forward to offset future taxable profits. The monetisation of these future tax offsets is what underlies the reduction in SCR permitted by LACDT.

At year-end 2022, the LACDT benefit is used to reduce the overall SCR by €17.3m (from €138.3m to €121.0m).

The future taxable profits are based on business projections (including future profits) within the time horizon of the Company's business plan (and no longer than 5 years into the future). Given that the period for recouping tax losses is relatively short, past losses carried forward are assumed to be utilised in full to offset future taxable profits. Assumptions used are believed to be realistic and achievable in nature and, in many cases, will be calibrated off past observations.

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

This section is not applicable to the Company as the Company does not use the duration-based equity risk sub-module when calculating its SCR.

4. Differences between the standard formula and any internal model Information

This section is not applicable to the Company as the Company does not use an internal model when calculating its SCR.

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

The Company complied with the Minimum Capital Requirement and the Solvency Capital Requirement during 2022.

The Company has a Capital Management Policy and a Capital Management Plan in place which set out the Company's approach to the setting and monitoring of capital resources, not just at a particular point in time, but over the business planning period. One of the strategic objectives of capital management within the Company is to ensure compliance with the regulatory capital requirements and in the case of adverse SCR levels, the approach to recoverability including the consideration of capital relief measures and/additional capital.

The Company's capital position is monitored on an ongoing basis in accordance with the Risk Appetite Framework. Specifically outside of the annual requirement to calculate a SCR, the Company calculates approximate SCRs on a quarterly basis and these are reported to the CBI as part of the quarterly QRTs. In order to ensure appropriate levels of capital at all times, the Company has defined ranges around its capital risk appetites with thresholds and limits that shall trigger actions.

The Board is responsible for approving and adopting this Capital Management Policy and ensuring sufficient oversight of Capital Management on an on-going basis.

6. Any other information

The Company has no other disclosures to make in respect of the Company's Capital Management.

Appendix I: Glossary

Term	Definition
AOTP	Actuarial Opinion on Technical Provisions
ARTP	Actuarial Report on Technical Provisions
CBI	Central Bank of Ireland
DFM	Development Factor Method
EEA	European Economic Area
EIOPA	European Insurance and Occupational Pensions Authority
ENID	Events Not In Data
EPIFP	Expected Profits in Future Premium
FOS	Freedom of Service
ICT	Information and Communications Technology
IFRS	International Financial Reporting Standards
MCR	Minimum Capital Requirement
MTPL	Motor Third Party Liability
OECD	Organisation for Economic Cooperation and Development
ONR	Online Reporting System
ORSA	Own Risk and Solvency Assessment
PCF	Pre-Approved Control Functions
PPOs	Periodical Payment Orders
QRT	Quantitative Reporting Template
SCR	Solvency Capital Requirement
SFCR	Solvency and Financial Condition Report
S&P	Standard & Poor's
TPL	Third Party Liability
UPR	Unearned Premium Reserve
USPs	Undertaking Specific Parameters
VYE	Vehicle Year Exposure
WBNYI	Written but not yet incepted

Appendix II: LPINS Related parties

The Company's related parties during the year included the following entities:

LeasePlan Ceska Republika s.r.o., Prague
LeasePlan Danmark A/S, Copenhagen
Auto Claims Handling A/S, Copenhagen,
LeasePlan Deutschland GmbH, Düsseldorf
LeasePlan Finance N.V.
LeasePlan Finland Oy, Helsinki
LeasePlan Fleet Management (Polska) Sp. z o.o., Warsaw
LeasePlan Fleet Management Services Ireland Ltd, Dublin
LeasePlan Fleet Management N.V., Zaventem
LeasePlan France S.A.S., Paris
LeasePlan Hellas S.A., Athens
LeasePlan Hungaria Zrt, Budapest
LeasePlan Italia S.p.A., Milan
LeasePlan Luxembourg, Luxembourg
LeasePlan Nederland N.V., Amsterdam
LeasePlan Norge AS, Oslo
LeasePlan Österreich Fuhrparkmanagement GmbH, Vienna
LeasePlan Partnerships & Alliances N.V., Zaventem
LeasePlan Portugal Comercio e Aluguer de Autom6veis e Equipamentos Unipessoal Lda., Lisbon
LeasePlan Romania SRL, Bucharest
LeasePlan Servicios S.A., Madrid
LeasePlan Slovakia s.r.o., Bratislava
Claims Management Sverige AB, Stockholm
LeasePlan Sverige AB, Stockholm
LeasePlan Truck N.V., Zaventem
LeasePlan UK Ltd, Slough
LeasePlan Versicherungsvermittlungsgesellschaft mbH, Düsseldorf
Accident Management Services B.V, Almere
LeasePlan Rechtshulp B.V, Amsterdam
Accident Management Services S.R.L., Bucharest
Fleet Accident Management Services Sp. z.o.o., Warsaw
Fleet Cover Sociedade Mediacao de Seguros Lda, Lisbon
Fleet Insurance Plan s.r.o., Prague
Garanthia Plan SL, Madrid
Societe de Courtages d'Assurances Groupe SARL, Paris

Appendix III: Quantitative Reporting Templates (“QRTs”)

The table below lists the annual disclosure quantitative templates submitted to the CBI in respect of the year ending 31 December 2022:

Code	Template Name
S.02.01.02	Balance Sheet
S.05.01.02	Premiums, claims and expenses by line of business
S.05.02.01	Premiums, claims and expenses by country
S.12.01.02	Life and Health SLT Technical Provisions
S.17.01.02	Non-Life Technical Provisions
S.19.01.21	Non-Life Insurance claims information
S.23.01.01	Own Funds
S.25.01.21	SCR - for undertakings on Standard Formula
S.28.01.01	MCR - for undertakings on Standard Formula

1. S.02.01.02

Balance sheet

Assets

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

	Solvency II value
	C0010
R0010	
R0020	
R0030	
R0040	
R0050	
R0060	2,145,496.15
R0070	420,127,179.53
R0080	
R0090	
R0100	
R0110	
R0120	
R0130	51,743,138.18
R0140	6,141,426.75
R0150	45,601,711.43
R0160	
R0170	
R0180	
R0190	
R0200	368,384,041.35
R0210	
R0220	
R0230	
R0240	
R0250	
R0260	
R0270	18,846,325.95
R0280	13,493,129.45
R0290	13,493,668.82
R0300	-539.38
R0310	5,353,196.50
R0320	
R0330	5,353,196.50
R0340	
R0350	
R0360	47,273,406.45
R0370	
R0380	409,975.43
R0390	
R0400	
R0410	185,184,808.73
R0420	
R0500	673,987,192.24

Liabilities

Technical provisions - non-life

Technical provisions - non-life (excluding health)

Technical provisions calculated as a whole

Best Estimate

Risk margin

Technical provisions - health (similar to non-life)

Technical provisions calculated as a whole

Best Estimate

Risk margin

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

Technical provisions - health (similar to life)

Technical provisions calculated as a whole

Best Estimate

Risk margin

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

Technical provisions calculated as a whole

Best Estimate

Risk margin

Technical provisions - index-linked and unit-linked

Technical provisions calculated as a whole

Best Estimate

Risk margin

Other technical provisions

Contingent liabilities

Provisions other than technical provisions

Pension benefit obligations

Deposits from reinsurers

Deferred tax liabilities

Derivatives

Debts owed to credit institutions

Financial liabilities other than debts owed to credit institutions

Insurance & intermediaries payables

Reinsurance payables

Payables (trade, not insurance)

Subordinated liabilities

Subordinated liabilities not in Basic Own Funds

Subordinated liabilities in Basic Own Funds

Any other liabilities, not elsewhere shown

Total liabilities

Excess of assets over liabilities

	Solvency II value
	C0010
R0510	255,496,694.38
R0520	248,099,265.30
R0530	
R0540	230,115,851.62
R0550	17,983,413.69
R0560	7,397,429.08
R0570	
R0580	6,651,821.39
R0590	745,607.70
R0600	6,086,248.87
R0610	
R0620	
R0630	
R0640	
R0650	6,086,248.87
R0660	
R0670	5,468,588.34
R0680	617,660.53
R0690	
R0700	
R0710	
R0720	
R0730	
R0740	
R0750	
R0760	
R0770	
R0780	
R0790	
R0800	0.00
R0810	2,207,418.45
R0820	88,139,975.86
R0830	2,115,223.92
R0840	8,372,776.18
R0850	
R0860	
R0870	
R0880	
R0900	362,418,337.66
R1000	311,568,854.58

2. S.05.01.02

Premiums, claims and expenses by line of business

Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)												Total
Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	
C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	
Premiums written												
Gross - Direct Business	R0110	11,629,205.88	123,924,897.79	107,587,575.50		419,243.55			1,634,107.86	6,218,222.07	11,247,883.08	262,661,135.73
Gross - Proportional reinsurance accepted	R0120		0.00	104,959.86						0.00		104,959.86
Gross - Non-proportional reinsurance accepted	R0130											
Reinsurers' share	R0140	0.00	5,394,647.76	3,670,565.47		0.00			0.00	1,039,053.38	0.00	10,104,266.62
Net	R0200	11,629,205.88	118,530,250.03	104,021,969.89		419,243.55			1,634,107.86	5,179,168.69	11,247,883.08	252,661,828.97
Premiums earned												
Gross - Direct Business	R0210	11,545,980.24	124,818,021.97	106,087,823.85		407,931.04			1,617,391.15	6,115,320.43	11,779,671.25	262,372,139.93
Gross - Proportional reinsurance accepted	R0220		0.00	104,959.86						0.00		104,959.86
Gross - Non-proportional reinsurance accepted	R0230											
Reinsurers' share	R0240	0.00	5,394,647.76	3,670,565.47		0.00			0.00	1,039,053.38	0.00	10,104,266.62
Net	R0300	11,545,980.24	119,423,374.21	102,522,218.24		407,931.04			1,617,391.15	5,076,267.05	11,779,671.25	252,372,833.17
Claims incurred												
Gross - Direct Business	R0310	3,346,378.15	66,176,685.94	69,062,016.56		44,898.00			379,780.11	2,717,008.82	1,183,786.74	142,910,554.32
Gross - Proportional reinsurance accepted	R0320		0.00	-28,799.74						0.00		-28,799.74
Gross - Non-proportional reinsurance accepted	R0330											
Reinsurers' share	R0340	-0.86	1,186,190.01	2,077,969.40		0.00			0.00	0.00	0.00	3,264,158.55
Net	R0400	3,346,379.01	64,990,495.93	66,955,247.43		44,898.00			379,780.11	2,717,008.82	1,183,786.74	139,617,596.03
Changes in other technical provisions												
Gross - Direct Business	R0410	132,523.20	11,858,537.86	4,537,267.87		-49,439.95			-116,646.87	93,561.01	-720,694.82	15,735,108.30
Gross - Proportional reinsurance accepted	R0420		0.00	-702,759.89						0.00		-702,759.89
Gross - Non-proportional reinsurance accepted	R0430											
Reinsurers' share	R0440	0.00	1,530,888.39	878,116.17		0.00			0.00	0.00	0.00	2,409,004.55
Net	R0500	132,523.20	10,327,649.47	2,956,391.81		-49,439.95			-116,646.87	93,561.01	-720,694.82	12,623,343.86
Expenses incurred	R0550	1,865,033.52	27,124,909.73	14,077,152.19		42,372.32			152,792.73	711,385.14	563,917.29	44,537,562.92
Other expenses	R1200											
Total expenses	R1300											44,537,562.92

Premiums, claims and expenses by line of business

		Line of Business for: life insurance obligations	Total
		Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations	
		C0260	C0300
Premiums written			
Gross	R1410	0.00	0.00
Reinsurers' share	R1420	0.00	0.00
Net	R1500	0.00	0.00
Premiums earned			
Gross	R1510	0.00	0.00
Reinsurers' share	R1520	0.00	0.00
Net	R1600	0.00	0.00
Claims incurred			
Gross	R1610	-982,125.95	-982,125.95
Reinsurers' share	R1620	-982,125.95	-982,125.95
Net	R1700	0.00	0.00
Changes in other technical provisions			
Gross	R1710	-4,241,362.34	-4,241,362.34
Reinsurers' share	R1720	0.00	0.00
Net	R1800	-4,241,362.34	-4,241,362.34
Expenses incurred	R1900	0.00	0.00
Other expenses	R2500		
Total expenses	R2600		0.00

3. S.05.02.01

Premiums, claims and expenses by country

		Home Country	Total Top 5 and home country	Top 5 countries (by amount of gross premiums written) - non-life obligations				
				(NL) Netherlands	(ES) Spain	(PT) Portugal	(PL) Poland	(NO) Norway
		C0080	C0140	C0090	C0090	C0090	C0090	C0090
Premiums written								
Gross - Direct Business	R0110	1,848,562.11	171,028,295.65	41,956,964.37	41,645,730.99	39,104,254.20	27,233,335.51	19,239,448.47
Gross - Proportional reinsurance accepted	R0120	104,959.86	104,959.86	0.00	0.00	0.00	0.00	0.00
Gross - Non-proportional reinsurance accepted	R0130							
Reinsurers' share	R0140	62,512.56	6,424,134.71	3,095,348.24	1,030,976.26	1,554,901.50	348,945.40	331,450.75
Net	R0200	1,891,009.41	164,709,120.80	38,861,616.13	40,614,754.73	37,549,352.70	26,884,390.11	18,907,997.72
Premiums earned								
Gross - Direct Business	R0210	1,675,162.07	170,445,934.06	42,112,858.87	41,428,466.86	39,327,975.24	26,905,080.29	18,996,390.73
Gross - Proportional reinsurance accepted	R0220	104,959.86	104,959.86	0.00	0.00	0.00	0.00	0.00
Gross - Non-proportional reinsurance accepted	R0230							
Reinsurers' share	R0240	62,512.56	6,424,134.71	3,095,348.24	1,030,976.26	1,554,901.50	348,945.40	331,450.75
Net	R0300	1,717,609.37	164,126,759.21	39,017,510.63	40,397,490.60	37,773,073.74	26,556,134.89	18,664,939.98
Claims incurred								
Gross - Direct Business	R0310	992,808.00	96,654,851.49	24,643,890.15	20,796,260.18	19,887,449.00	14,560,253.20	15,774,190.96
Gross - Proportional reinsurance accepted	R0320	-28,799.74	-28,799.74	0.00	0.00	0.00	0.00	0.00
Gross - Non-proportional reinsurance accepted	R0330							
Reinsurers' share	R0340	-271,503.87	466,850.38	301,075.44	78,836.05	-0.32	-32.56	358,475.65
Net	R0400	1,235,512.14	96,159,201.37	24,342,814.71	20,717,424.13	19,887,449.32	14,560,285.76	15,415,715.31
Changes in other technical provisions								
Gross - Direct Business	R0410	2,996,470.42	13,511,308.79	4,534,925.29	2,188,520.64	3,044,514.03	1,483,369.20	-736,490.79
Gross - Proportional reinsurance accepted	R0420	-702,759.89	-702,759.89	0.00	0.00	0.00	0.00	0.00
Gross - Non-proportional reinsurance accepted	R0430							
Reinsurers' share	R0440	2,645.92	1,901,613.51	1,770,503.67	51,461.98	-73,880.33	172,611.13	-21,728.87
Net	R0500	2,291,064.60	10,906,935.39	2,764,421.62	2,137,058.66	3,118,394.36	1,310,758.07	-714,761.92
Expenses incurred	R0550	10,781,044.35	33,960,693.10	7,868,667.97	5,647,408.29	4,787,369.50	4,080,498.88	795,704.11
Other expenses	R1200							
Total expenses	R1300		33,960,693.10					

Premiums, claims and expenses by country

		Home Country	Total Top 5 and home country	Top 5 countries (by amount of gross premiums written) - life obligations			
	R1400						
		C0220	C0280	C0230	C0230	C0230	C0230
Premiums written							
Gross	R1410						
Reinsurers' share	R1420						
Net	R1500						
Premiums earned							
Gross	R1510						
Reinsurers' share	R1520						
Net	R1600						
Claims incurred							
Gross	R1610						
Reinsurers' share	R1620						
Net	R1700						
Changes in other technical provisions							
Gross	R1710						
Reinsurers' share	R1720						
Net	R1800						
Expenses incurred	R1900						
Other expenses	R2500						
Total expenses	R2600						

4. S.12.01.02

Life and Health SLT Technical Provisions

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

Gross Best Estimate
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default
Best estimate minus recoverables from reinsurance/SPV and Finite Re - total

Risk margin

Amount of the transitional on Technical Provisions

Technical provisions calculated as a whole

Best Estimate

Risk margin

Technical provisions - total

Insurance with profit participation	Index-linked and unit-linked insurance			Other life insurance			Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Accepted reinsurance	Total (Life other than health insurance, incl. Unit-Linked)	Health insurance (direct business)			Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Health reinsurance (reinsurance accepted)	Total (Health similar to life insurance)
		Contracts without options and guarantees	Contracts with options or guarantees		Contracts without options and guarantees	Contracts with options or guarantees					Contracts without options and guarantees	Contracts with options or guarantees			
C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0150	C0160	C0170	C0180	C0190	C0200	C0210
							0.00		0.00						
							5,468,588.34		5,468,588.34						
							5,353,196.50		5,353,196.50						
							115,391.83		115,391.83						
							617,660.53		617,660.53						
							6,086,248.87		6,086,248.87						

5. S.17.01.02

Non-life Technical Provisions

Technical provisions calculated as a whole

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

Technical provisions calculated as a sum of BE and RM

Best Estimate

Premium provisions

Gross

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

Net Best Estimate of Premium Provisions

Claims provisions

Gross

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

Net Best Estimate of Claims Provisions

Total Best estimate - gross

Total Best estimate - net

Risk margin

Amount of the transitional on Technical Provisions

Technical provisions calculated as a whole

Best Estimate

Risk margin

Technical provisions - total

Technical provisions - total

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

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

Direct business and accepted proportional reinsurance												Total Non-Life obligation
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	
C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0180
R0010												
R0050												
R0060	-4,352,823.47		-20,537,640.62	-6,029,149.14		166,620.59			-565,505.85	1,057,708.74	-6,950,053.37	-39,659,501.79
R0140	126.80		-4,661,409.79	-805,286.47		0.00			0.00	-501,584.78	0.00	-5,968,154.24
R0150	-4,352,950.27		-15,876,230.83	-5,223,862.67		166,620.59			-565,505.85	-556,123.96	-6,950,053.37	-33,691,347.55
R0160	11,004,644.86		218,086,864.88	41,631,645.28		96,577.77			1,042,045.97	643,685.62	3,921,710.42	276,427,174.79
R0240	-666.18		16,599,384.23	2,862,584.22		-1.49			-8.20	0.51	-9.40	19,461,283.69
R0250	11,005,311.03		201,487,480.65	38,769,061.07		96,579.26			1,042,054.17	643,685.10	3,921,719.82	256,965,891.10
R0260	6,651,821.38		197,549,224.26	35,602,496.14		-70,042.82			476,540.11	-414,023.12	-3,028,342.95	236,767,673.00
R0270	6,652,360.76		185,611,249.82	33,545,198.39		-70,041.33			476,548.31	87,561.14	-3,028,333.55	223,274,543.55
R0280	745,607.70		14,776,237.39	2,820,706.67		6,543.52			70,602.69	43,612.22	265,711.21	18,729,021.40
R0290												
R0300												
R0310												
R0320	7,397,429.08		212,325,461.65	38,423,202.81		-63,499.30			547,142.80	-370,410.90	-2,762,631.74	255,496,694.40
R0330	-539.37		11,937,974.44	2,057,297.75		-1.49			-8.20	-501,584.26	-9.40	13,493,129.45
R0340	7,397,968.46		200,387,487.21	36,365,905.06		-63,497.81			547,151.00	131,173.36	-2,762,622.34	242,003,564.95

6. S.19.01.21

Non-life insurance claims information

Total Non-Life Business

Accident year / Underwriting year

Z0020	(1) Accident year
-------	-------------------

Gross Claims Paid (non-cumulative)

(absolute amount)	Year	Development year												In Current year		Sum of years (cumulative)
		0	1	2	3	4	5	6	7	8	9	10 & +				
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110		C0170	C0180	
Prior	R0100											6,148,540.04		R0100	6,148,540.04	6,148,540.04
N-9	R0160	42,645,813.20	16,800,047.41	3,803,553.65	2,890,982.94	1,626,276.99	1,227,357.46	628,960.79	1,397,618.53	187,073.32	131,064.71			R0160	131,064.71	71,338,749.01
N-8	R0170	43,674,784.45	20,100,728.49	6,668,605.81	2,580,831.78	1,737,380.57	809,733.28	1,029,603.77	1,551,430.29	938,365.60				R0170	938,365.60	79,091,464.05
N-7	R0180	47,222,262.56	25,933,537.34	5,976,770.52	3,657,057.12	2,038,322.41	1,752,193.55	943,002.36	1,157,682.38					R0180	1,157,682.38	88,680,828.25
N-6	R0190	49,999,384.53	28,845,113.06	9,299,451.05	2,395,751.78	2,409,132.85	2,876,627.96	1,530,803.87						R0190	1,530,803.87	97,356,265.10
N-5	R0200	57,645,771.92	34,048,911.96	10,756,583.24	2,489,218.63	3,456,403.21	1,098,699.89							R0200	1,098,699.89	109,495,588.86
N-4	R0210	71,587,311.24	43,650,651.26	9,424,281.21	6,122,119.14	4,205,140.40								R0210	4,205,140.40	134,989,503.24
N-3	R0220	79,782,232.02	38,502,237.57	7,985,712.26	6,445,495.68									R0220	6,445,495.68	132,715,677.53
N-2	R0230	71,113,932.41	26,124,078.30	5,985,524.44										R0230	5,985,524.44	103,223,535.14
N-1	R0240	69,408,874.13	33,891,740.12											R0240	33,891,740.12	103,300,614.25
N	R0250	76,196,992.71												R0250	76,196,992.71	76,196,992.71
	Total													R0260	137,730,049.85	1,002,537,758.16

Difference in Basis between above Triangle and Financial Statements:

The Company's paid claims triangles are produced using claims bordereaux provided by the Company's claims handlers. These bordereaux record the timing of payments made by the claims handlers themselves, and thus the triangles are produced based on these timings. These timings contrast to those used to produce the paid figure in the Company's Profit and Loss Account ("P+L"). In the P+L, the timings used are the point at which the Company makes payments to the claims handlers.

Other areas where there are differences between the basis used for the paid claims triangles and the P+L are: - Currency rates, i.e. point in time against built up over the reporting period; - adjustments made to the P+L for previous years; and - the timing of deductible refunds.

Gross undiscounted Best Estimate Claims Provisions

Development year													Year end (discounted data)	
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											12,830,694.01	R0100	12,503,705.88
N-9	R0160	0.00	0.00	0.00	11,958,638.74	9,302,481.27	6,983,897.72	5,938,941.45	2,555,638.97	2,022,438.71	3,484,345.92		R0160	3,217,649.88
N-8	R0170	0.00	0.00	21,145,995.37	14,810,688.51	9,296,656.22	8,166,105.85	5,142,740.31	4,057,554.80	3,711,360.88			R0170	3,536,573.30
N-7	R0180	0.00	35,672,160.20	24,711,567.25	18,713,787.49	14,342,619.41	9,652,972.65	7,762,754.83	6,869,373.10				R0180	6,405,730.58
N-6	R0190	74,186,046.29	47,589,143.75	28,813,842.05	21,646,184.90	13,611,949.45	8,328,396.69	7,094,317.11					R0190	6,702,362.68
N-5	R0200	81,315,769.65	49,711,837.41	29,676,249.02	22,117,737.45	14,270,208.18	14,976,204.09						R0200	13,781,641.03
N-4	R0210	92,873,426.43	64,287,336.86	48,705,238.84	31,948,269.39	28,080,695.35							R0210	25,702,567.14
N-3	R0220	86,666,125.13	59,809,429.09	40,470,496.80	35,656,315.05								R0220	31,874,883.99
N-2	R0230	91,541,551.16	47,858,269.19	37,198,846.16									R0230	33,071,558.71
N-1	R0240	96,262,139.88	55,846,668.08										R0240	50,848,834.03
N	R0250	96,211,337.99											R0250	88,781,667.57
Total													R0260	276,427,174.79

7. S.23.01.01

Own funds

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

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

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

Deductions

Deductions for participations in financial and credit institutions

Total basic own funds after deductions

Ancillary own funds

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

Total ancillary own funds

Available and eligible own funds

Total available own funds to meet the SCR
Total available own funds to meet the MCR
Total eligible own funds to meet the SCR
Total eligible own funds to meet the MCR

SCR

MCR

Ratio of Eligible own funds to SCR

Ratio of Eligible own funds to MCR

	Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
	C0010	C0020	C0030	C0040	C0050
R0010	679,000.00	679,000.00			
R0030	0.00	0.00			
R0040	0.00	0.00			
R0050					
R0070	0.00	0.00			
R0090					
R0110					
R0130	300,084,854.59	300,084,854.59			
R0140					
R0160					
R0180	10,805,000.00	10,805,000.00			
R0220	0.00				
R0230					
R0290	311,568,854.59	311,568,854.59			
R0300					
R0310					
R0320					
R0330					
R0340					
R0350					
R0360					
R0370					
R0390					
R0400					
R0500	311,568,854.59	311,568,854.59			
R0510	311,568,854.59	311,568,854.59			
R0540	311,568,854.59	311,568,854.59			
R0550	311,568,854.59	311,568,854.59			
R0580	121,018,244.00				
R0600	40,892,717.16				
R0620	257.4561%				
R0640	761.9177%				

C0060

Reconciliation reserve

Excess of assets over liabilities

Own shares (held directly and indirectly)

Foreseeable dividends, distributions and charges

Other basic own fund items

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

Reconciliation reserve

Expected profits

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

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

Total EPIFP

R0700	311,568,854.59
R0710	
R0720	0.00
R0730	11,484,000.00
R0740	
R0760	300,084,854.59
R0770	
R0780	43,528,206.05
R0790	43,528,206.05

8. S.25.01.21

Solvency Capital Requirement - for undertakings on Standard Formula

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0120
Market risk	R0010	32,177,614.68		
Counterparty default risk	R0020	17,369,583.12		
Life underwriting risk	R0030	130,892.01		
Health underwriting risk	R0040	37,879,728.87		
Non-life underwriting risk	R0050	98,582,778.28		
Diversification	R0060	-55,708,344.86		
Intangible asset risk	R0070	0.00		
Basic Solvency Capital Requirement	R0100	130,432,252.09		

Calculation of Solvency Capital Requirement

Operational risk
 Loss-absorbing capacity of technical provisions
 Loss-absorbing capacity of deferred taxes
 Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC

Solvency capital requirement, excluding capital add-on

Capital add-ons already set

Solvency Capital Requirement

Other information on SCR

Capital requirement for duration-based equity risk sub-module
 Total amount of Notional Solvency Capital Requirements for remaining part
 Total amount of Notional Solvency Capital Requirements for ring fenced funds
 Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios
 Diversification effects due to RFF nSCR aggregation for article 304

	C0100
R0130	7,874,312.99
R0140	0.00
R0150	-17,288,320.64
R0160	0.00
R0200	121,018,244.45
R0210	0.00
R0220	121,018,244.45
R0400	0.00
R0410	
R0420	
R0430	
R0440	

	YES/NO	LAC DT
	C0109	C0130
Approach to tax rate		
Approach based on average tax rate	R0590 (2) No	

Calculation of loss absorbing capacity of deferred taxes

LAC DT	R0640	-17,288,320.64
LAC DT justified by reversion of deferred tax liabilities	R0650	0.00
LAC DT justified by reference to probable future taxable economic profit	R0660	-17,288,320.64
LAC DT justified by carry back, current year	R0670	0.00
LAC DT justified by carry back, future years	R0680	0.00
Maximum LAC DT	R0690	-17,288,320.64

9. S.28.01.01

Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity

Linear formula component for non-life insurance and reinsurance obligations


		C0010		
MCRNL Result		R0010	40,890,293.94	
			Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
			C0020	C0030
Medical expense insurance and proportional reinsurance	R0020			
Income protection insurance and proportional reinsurance	R0030		6,652,360.76	11,621,315.22
Workers' compensation insurance and proportional reinsurance	R0040			
Motor vehicle liability insurance and proportional reinsurance	R0050		185,611,249.82	118,337,369.49
Other motor insurance and proportional reinsurance	R0060		33,545,198.39	102,839,042.40
Marine, aviation and transport insurance and proportional reinsurance	R0070			
Fire and other damage to property insurance and proportional reinsurance	R0080		0.00	420,083.07
General liability insurance and proportional reinsurance	R0090			
Credit and suretyship insurance and proportional reinsurance	R0100			
Legal expenses insurance and proportional reinsurance	R0110		476,548.31	1,633,838.81
Assistance and proportional reinsurance	R0120		87,561.14	4,619,923.87
Miscellaneous financial loss insurance and proportional reinsurance	R0130		0.00	10,650,544.28
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		
MCRL Result		R0200	2,423.23	
			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		115,391.83	
Total capital at risk for all life (re)insurance obligations	R0250			

Overall MCR calculation

		C0070
Linear MCR	R0300	40,892,717.16
SCR	R0310	120,999,627.01
MCR cap	R0320	54,449,832.15
MCR floor	R0330	30,249,906.75
Combined MCR	R0340	40,892,717.16
Absolute floor of the MCR	R0350	3,700,000.00
Minimum Capital Requirement	R0400	40,892,717.16

The background of the page features large, abstract, overlapping shapes in shades of orange and red, creating a dynamic and modern aesthetic.

Euro Insurances DAC trading as LeasePlan Insurance is regulated by the Central Bank of Ireland