# Solvency & Financial Condition Report

2022



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## **Summary**

Norwegian Hull Club (NHC) is a mutual insurance undertaking writing global marine and medical expense insurance. The 2022 earned gross premium was 324 million USD, up with 21 % from 2021. The growth is due to increase in business volume, in part due to external factors and in part due to growth in new segments such as Offshore Windfarms. The operating result was 21 million USD.

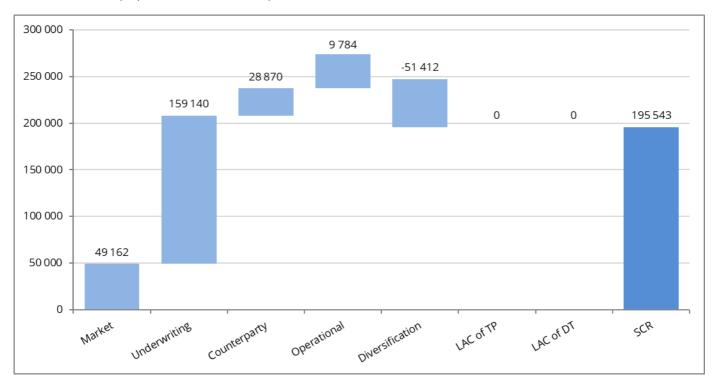
The below table summarizes the solvency conditions in terms of Solvency Capital Requirement (SCR), Minimum Capital Requirement (MCR) and Own Funds in USD 1000.

Eligible Own Funds
Capital Requirement
Difference
Ratio

2022		
SCR	MCR	
499,243	401,471	
195,543	60,672	
303,700	340,799	
255%	662%	

20	)21
SCR	MCR
486,424	391,240
190,368	47,592
296,056	343,648
256%	822%

The chart below displays how the SCR is built up:



## **A Business and Performance**

## **A.1 Business**

NHC is a mutual marine insurance company writing marine and medical insurance. Clients writing hull insurance on a mutual basis are owners, referred to as members. Members are owners and managers of insured units.

Principal Address: Solheimsgaten 5

5058 Bergen Norway

Details regarding supervisory authorities and external auditor are summarised below:

Name	Function	Entity
Financial Supervisory Authority of Norway	Regulator	Norwegian Hull Club – Gjensidig Assuranseforening
Revierstredet 3, 0151 Oslo E-mail: post@finanstilsynet.no		
Phone: +47 22 93 98 00		
Bank of England, Prudential Regulation Authority	Regulator	UK Branch
20 Moorgate, London. EC2R 6DA		
E-mail: pra.firmenquiries@bankofEngland.co.uk		
Phone: +44 (0) 20 3461 7000		
Deloitte	External	Norwegian Hull Club - Gjensidig Assuranseforening
Lars Hilles gate 30, 5008 Bergen	Auditor	
E-mail: umoe@deloitte.no		
Phone: +47 55 21 81 00		

The largest members have less than 10% ownership and there are thus no holders of qualifying holdings in the undertaking.

NHC writes a global book of Hull & Machinery, Loss of Hire, Increased Value, War, yachts, Builders risk covers, Energy (fixed and floating) insurance -operation and construction. Marine and Energy insurance is placed and written globally, mainly through brokers. A major part of the business is with international clients.

NHC has 4 % market share of global hull market. The Nordic market has its own conditions (http://www.nordicplan.org/), in which the role as claims leader is distinctive and important. NHC has long experience as claims leader, and this role is an important part of its service offering.

NHC has a branch office in London, writing business produced by London brokers as well as maintaining the existing business relationships.

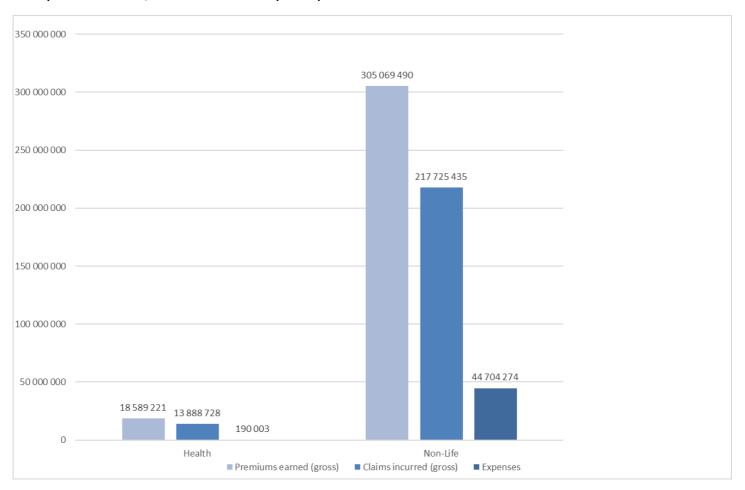
#### Legal structure

NHC has two subsidiaries (100% owned) located in Bergen: Insurance Technology Solutions AS and Marine Benefits AS. NHC has also a participation in Olav Kyrres gate 11 AS with 33 % share. Information regarding subsidiaries and associated company's results can be found from the Annual Report note 4.

## **A.2 Underwriting Performance**

NHC has had strong underwriting performance reflecting its focus on underwriting profit through comprehensive Client Risks Assessment models. The underwriting performance during the past three years has been above expected performance.

## Gross premiums earned, claims incurred and expenses per LoB:



## A.2.1 Non-Life underwriting

Non-Life underwriting performance is shown in the table below. The underwriting performance for 2021 and 2022 was above internal targets.

Premiums, claims and expenses	2022	2021
Non-Life		
Premiums earned (gross)	305,069,490	249,041,844
Claims incurred (gross)	217,725,435	155,170,977
Expenses	44,704,274	42,073,825

#### A.2.2 Health underwriting

Health underwriting performance is shown in the table below. The health portfolio is limited to Medical Expense Insurance for seafarers.

Premiums, claims and expenses	2022	2021
Health		
Premiums earned (gross)	18,589,221	18,600,539
Claims incurred (gross)	13,888,728	12,601,443
Expenses	190,003	165,090

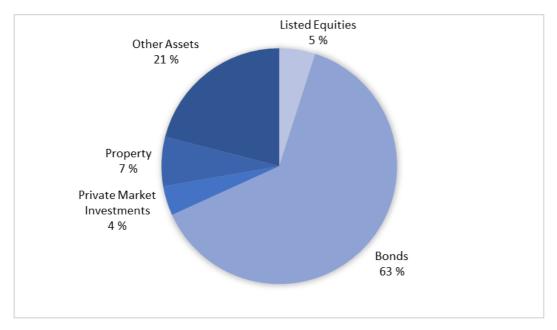
## A.2.3 Life underwriting

NHC does not write life insurance.

## **A.3 Investment Performance**

#### A.3.1 Investments held

The chart below visualizes the relative distribution of the investments by material asset class.



## A.3.2 Gains and losses

The investment portfolio delivered -4.6 % return in 2022 against the benchmark return of -5.3 % (in local currencies). The US dollar return was - USD 23.7 million, including foreign exchange hedges.

NHC's fixed income and listed equity investments both posted negative returns in 2022. Rising interest rates and widening credit spreads left few areas of the bond market unscathed, with long-duration credit being hit the hardest. As most of NHC's fixed-income investments are held in short-to-medium term government and investment grade bonds, with average duration close to two years, losses were muted compared to the aggregate bond market which incurred double-digit losses. Illiquid investments such as private equity, private loans and real-estate investments were the only asset classes delivering positive returns in 2022. This came as no surprise, as valuations in these types of assets are generally slower to adopt to sudden changes in market conditions. Due to appreciation of the US dollar in 2022, NHC experienced some currency exchange losses. The currency exchange losses are included in "Cash and deposits" in the table below.

The below table summarizes the investment portfolio return per asset class:

Gains and losses in the period (2022)	Dividends	Interest	Rent	Net gains/losses	Unrealised gains/losses
Bonds	-	6,876,508	-	(5,117,265)	(13,558,690)
Equity	-	-	-	-	-
Other Investments	-	1,774,138	-	4,639,414	(22,239,729)
Cash and deposits	-	1,977,757	-	(576,353)	(1,158,456)
Mortgages and loans	-	379,613	-	-	7,898
Property	-	-	-	-	-
Derivatives	-	-	-	10,311,140	(6,803,492)
Total	-	11,008,016	-	9,256,936	(43,752,469)

## **A.3.3 Securitisation investments**

NHC has no material investments in securitisations.

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

There have been no other significant activities than insurance and related activities. Income related to claims handling is reported as "Other insurance related income" in the annual accounts and amounts to 6.8 MUSD.

## **A.5 Any other information**There is no other material information to be disclosed.

## **B** System of governance

NHC is located in Norway and is subject to Norwegian legislation and is under supervision of the Financial Supervisory Authority of Norway. NHC UK Branch is located in London and under supervision of Bank of England, Prudential Regulation Authority.

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

NHC's Board of Directors (Board) carry the responsibility for the oversight of the business and set its strategy and risk appetite. The Board sits with a minimum of seven and a maximum of twelve members. The Board decides whether the entire Board shall serve as audit and risk committees, or whether the committees shall be elected by and from the members of the Board. NHC is committed to high standards of corporate governance and has established the following corporate governance structure.

#### **General Meeting**

Members of NHC, clients that write business on a mutual basis, vote at the general meeting according to the Norwegian Limited Companies Act § 5-2, cf. Norwegian Financial Institutions § 8.1-8.3. Members have votes according to the member's share of the NHC's mutual earned premium in the preceding calendar year. Joint Members have together as many votes as if the insurance agreement had been entered into by one member. The right to vote on behalf of the Joint Members shall be vested in the member named first in the insurance agreement.

#### Committee

The Committee elects the Board and the Election Committee, recommends annual accounts to the General Meeting and supervises the Board and management. The members of the Committee are elected from the members, i.e. the owners, of NHC.

#### **Board of Directors**

The Board is responsible for setting out the strategy, including risk tolerance, and generally overseeing the daily management of the NHC. Up to two members of the Board can be independent; the others represent members of NHC. The Board has audit, risk and compensation sub-committees. The Chair of the Audit Committee is independent of NHC.

### **Audit Committee**

The Audit Committee is a subcommittee of the Board. Its responsibility is to discuss significant accounting issues with management and the external auditor and to assess procedures adopted for preparing the accounts. The Audit Committee shall further assess the independence of the external auditor, discuss audit issues with external and internal auditor, assess the auditors' work and make recommendation to the Board regarding election of external and internal auditors.

#### **Risk Committee**

The Risk Committee is a subcommittee of the Board. It is responsible for supervising NHC's total risk and regularly considers if the management and control systems are adapted to the risk level and scope of operations. The Risk Committee shall further regularly consider the continuous compliance with capital requirements and requirements for technical insurance provisions, as well as the appropriateness of the risk management system. The Risk Committee shall follow up the key functions: actuary, compliance and risk management.

#### **Compensation Committee**

The Compensation Committee is also a subcommittee of the Board and makes recommendations to the Board regarding the compensation of the Chief Executive Officer (CEO) as well as the structure of general compensation, including compensation for the management team.

## **Election Committee**

The Election Committee makes recommendations on candidates for the various governing bodies. The Election Committee shall have a minimum of five members. At least one member shall have served on the Board during the last five years.

According to the instructions for the Election Committee, the Chair and Deputy Chair of the Committee, members of the Board and members of the Election Committee shall in general not be re-elected after ten years of service.

### **Key Functions**

NHC has established four key independent control functions required under the Solvency II Directive - risk management,

compliance, actuarial and internal audit. These key functions are overviewing and monitoring the risk in the company.

#### Remuneration

NHC's remuneration policy is adopted by the Board on an annual basis. The variable remuneration scheme is split in two, where part one is collective and allocated among all employees and part two is individual and remuneration is based on individual and department performance according to set KPIs.

#### Material transaction with stakeholders

As a mutual insurance company NHC will, by definition, enter into commercial agreements with member owners and with members of the Board. None of these transactions are considered material in relation to NHC's business volume.

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

The fit and proper requirements apply for the following positions in NHC:

- Members of the Board
- Members of Top Management Group (TMG)
- Persons defined as key personnel (Head of Risk Management, Compliance Officer, Actuarial function, Internal auditor, Head of Reinsurance, Business Intelligence Director and Anti-Money Laundering Officer)
- Head of UK Branch

For the Board, the requirements for professional know-how and experience (Fit) apply to the Board as a group. This implies that collectively, the Board shall have sufficient knowledge and experience in the key areas of operation for an insurance undertaking such as insurance, reinsurance, investments, risk management and marketing as well as regulatory frameworks, requirements and expectations.

For TMG, key personnel and the Head of the UK Branch, the requirements for professional know-how and experience (Fit) apply to each person individually, and in relation to his/her specific area of responsibility. The following skills, knowledge and expertise are emphasized: market knowledge, business strategies and models, insurance, reinsurance, risk management, accounting, finance, investment, actuarial analysis and regulatory framework and requirements.

Fit and proper requirements will be subject to subjective assessment. An assessment of "Proper" should include an assessment of that person's honesty and financial standing based on relevant evidence regarding their character, personal behavior and business conduct including any criminal, financial and supervisory aspects regardless of jurisdiction. Certificate of good conduct and aptitude assessment shall be presented to the HR department for assessment.

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

The foundation of the good internal governance is a risk management framework and associated delegations of authority to ensure the effective management and reporting of risks in the organisation.

## **B.3.1** Risk management system

In NHC the Board sets overall target, risk tolerance and risk appetite as part of the annual strategic planning. NHC will act in accordance with this risk appetite to achieve strategic objectives and to remain a prudent risk taker in order to safeguard the long-term interest of the Owners, Clients and Employees.

The Risk Committee is a sub-committee of the Board of NHC and shall serve as a body preparing issues for the Board and supporting them in its execution of its duties relating to risk management. The Risk Committee shall have the following responsibilities:

- Supervise NHC's total risk and they shall regularly consider if the management and risk management framework are adapted to the risk level and scope of the operations.
- Assess in particular, if NHC has an appropriate risk management system in place. The assessment shall be based on the principles and policies adopted for risk management, including the stated risk appetite.
- Regularly consider the risk profile, capital and total capital requirement in relation to risks that NHC could be exposed to in the short and long term.
- Regularly consider the continuous compliance with capital requirements and requirements for technical insurance
  provisions. The Risk Committee shall consider any discrepancy between the risk profile and the assumptions made in
  calculating the SCR.

The CEO is responsible for the risk management within limits defined annually by the Board in the Strategy, Financial Plan and Policy documents. Authority is delegated to heads of departments in accordance with these limits. Within the departments a system of authorities is defined and risk taking is always approved by at least two employees (four eyes principle). The CEO has established a Top Management Group (TMG). This group monitors the overall risk and discusses risk taking outside the authority of heads of department, controversial issues and risk taking that effect other departments. Final decisions are made by the CEO. Risk taking outside the limits set by the Board, or reallocation of the risk budget, can also be discussed with the purpose of suggesting changes in the strategy or other policy documents. The CEO has delegated the responsibility for risk management processes and follow-up to the Chief Financial Officer.

The Key Functions act as Second Line of defense and are overviewing and monitoring the risk in the company. NHC's Key functions provide regular risk reporting to TMG and to Risk Committee/Board regarding the key risks.

The Risk Management Function is to facilitate the implementation of the Risk Management System and ensure that risk management is carried out in accordance with approved ambition levels and approved guidelines.

## **B.3.2** Own risk and solvency assessment

The main purpose of the Own Risk and Solvency Assessment (ORSA) process and report is to safeguard the short-term (1 year) solvency and long-term survival of NHC. In addition, the report can give insight into risk/reward to improve the profitability.

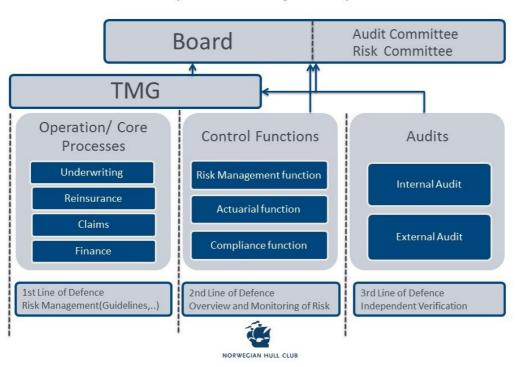
NHC produces an ORSA report at least once a year. Additional ORSAs may be produced in response to material changes to risks faced by NHC.

NHC has determined that the Solvency II standard formula shall be used to calculate the required solvency capital and to assess the overall solvency needs. In addition, quantitative analyses performed shall include:

- Stress test to evaluate the capital situation when the investment and insurance portfolio puts the balance sheet under pressure
- Scenario analyses of the insurance portfolio including varying premium volume, loss ratios and cost of reinsurance, performed at least annually
- Reverse stress testing
- Financial Plan
- Evaluation that the risk taking is in line with the risk appetite
- Analysis of timeseries of the individual risks
- Analysis of emerging risks including climate risk
- A one in 200 years scenario is to be used

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

NHC utilises the internal control system that comprises three lines of defence, comprising primary risk owners (first line), independent risk management and control functions (second line) and an independent internal and external audit (third line). This structure is consistent with NHC's risk management structure and the Board considers it appropriate to the management of the NHC risks.



Solvency II - Risk Management System

Under the first line of defence, operational management has the ownership, responsibility and accountability for assessing, controlling, mitigating and reporting risks.

The second line of defence consists of activities covered by Risk Management, Actuarial and Compliance functions. This line of defence monitors and facilitates the implementation of an effective risk management system by operational management and assists the risk owners in reporting risk related information both to management and towards the organization.

Internal and external audit forms the organisation's third line of defence. An independent internal audit function will provide independent and objective reviews and assessments of NHC's business activities, operations, financial systems and internal controls. NHC is using a third party for internal audit function.

This framework enables the first line of defence to identify, assess and manage operational risks within their business units, establishes an appropriate level of oversight and challenge by the second and third lines, and enables appropriate measurement and reporting of operational risks and the NHC overall risk profile to the Board.

NHC's total quality management system, called DNA, has an important role in the overall internal control system. All policies, principles and procedures for all departments are in place and documented in the DNA system, including formal revisions of same. Non-conformances, observations and suggestions for improvements and input regarding ORSA reporting and emerging risks are reported and followed-up in the DNA system as well.

## **B.4.1 Compliance function**

The compliance function shall ensure that NHC complies with governing laws and regulations and internal policies that are derived from external requirements. The Compliance function may also design or update internal policies to mitigate the risk of NHC breaking laws and regulations, as well as lead internal audits of procedures. The Compliance function, headed by the Compliance Officer, is part of NHC's overall corporate governance structure. The function is responsible for the monitoring, managing, and reporting of the Compliance risks to which NHC is exposed. The Compliance function reports to the Head of Risk Management, but has a direct reporting line to the CEO, the Board and its sub committees. The activities of the Compliance function are subject to periodic review by Internal Audit.

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

Internal Audit function provides independent and objective reviews and assessments of the business activities, operations, financial systems and internal controls. The internal audit shall ensure that NHC resources are used efficiently and effectively while working towards helping NHC achieve its mission, as directed by the Board. The function shall perform this service with professional care and with minimal disruption to NHC operations. NHC has outsourced the internal audit to a third party. The operative responsibility for the Internal Audit function is handled daily by the Compliance Officer.

Based on risk assessments, an annual audit plan is prepared and presented to the Board for approval. The internal auditor carries out annual reviews as stated in the annual plan to evaluate the appropriateness and effectiveness of the internal control processes.

Internal audit reports are provided to the Board at least once a year. The reports highlight any significant control failings or weaknesses identified and the impact they have had, or may have, and recommendations on how to mitigate the weakness. Outsourcing this function provides independency and objectivity when reviewing activities.

## **B.6** Actuarial function

Actuarial function is responsible for overseeing the calculation of technical provisions and report findings to the Board annually and to expressing an opinion on the Underwriting Policy and the Reinsurance arrangements. Written opinions on the Underwriting Policy and Reinsurance arrangements are discussed with the Risk Committee and TMG. The report on the technical provisions is reviewed by the Board together with the annual accounts.

Actuarial function will also contribute to the effective implementation of the risk management system with respect to the risk modelling underlying the capital requirements.

The actuarial function is involved in the company's ORSA process. The annual process is finalized through thorough discussion in the Risk Committee and in the Board.

## **B.7 Outsourcing**

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

NHC has established an Outsourcing Policy setting out the requirements for identifying, justifying and implementing material outsourcing arrangements. This policy has been adopted by the Board.

For the time being NHC has outsourced the following operational functions or activities:

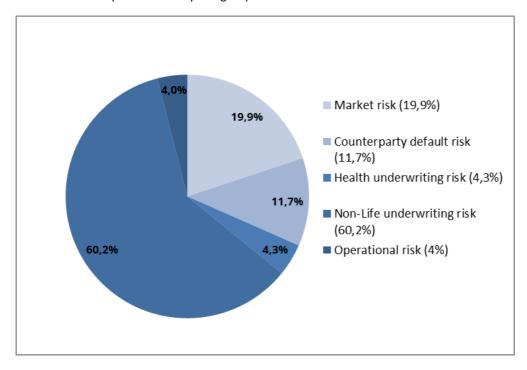
- Internal Audit located in Norway
- IT Infrastructure located in Norway
- Administrative support and service located in Norway and the Philippines
- Asset/Fund management of two discretionary accounts one located in the US and the other in the UK
- Underwriting of Medical Plan and Crew P&I located in Norway
- Claims services of Medical Plan and Crew P&I located in Norway, Singapore and the Philippines
- Underwriting and Claims Service of H&M insurance (Small hull facility) located in Norway

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

There is no other material information to be disclosed.

## C Risk Profile

The below chart splits the SCR by risk groups:



## C.1 Underwriting risk

The Underwriting risk is the sum of premium and reserve risk, catastrophe risk and lapse risk.

The premium risk is the risk that the premium is insufficient to cover future claims. The reserve risk is the risk that the claim provisions are insufficient to cover incurred but not settled claims. The volume measure for the premium risk is the maximum of the past year's earned net premium and the expected earned net premium the next year with an add-on for multi-year policies. The volume measure for reserve risk is the net claims provision. The Standard Model assumes 50 % correlation between premium and reserve risk.

Catastrophe risk is comprised of non-life natural catastrophe risk (Windstorm, Earthquake, Flooding, Hail), Non-life man made catastrophe risk (total loss of tanker and platform) and health catastrophe (accident, concentration, pandemic). The only Nat-Cat scenarios affecting NHC are related to onshore marine (yards, refineries, etc.) and the Non-Marine Cat scenarios are thus dominated by the man-made scenarios (total loss of a tanker and/or a platform). These scenarios also affect the counterparty credit risk. The health cat risk is dominated by pandemic risk.

## Material risk concentrations

The standard model only identifies concentration risks in Health insurance. Un-modelled concentration risk includes any marine event involving several vessels/units or Offshore Windfarms. Historically there are few events involving severe casualties on several non-coastal vessels. The most likely events involving several vessels/units are related to ports, superyacht marinas, lay-up locations and yards in addition to fixed installations in windstorm areas or War related incidents such as trapping of several vessels in Ukraine in 2022. Most of the risk related to these events are reinsured.

### Risk mitigation and process for monitoring its effectiveness

Excess of loss reinsurance is used to mitigate the underwriting risk. This has effectively reduced the effect of single claims.

### Sensitivity

The standard model is sensitive to input related to claim provisions, premium projections, geographical diversification, allocation to lines of business and scenarios related to risk concentrations. There are no known issues related to the input that would result in a significant increase in the requirements if addressed differently. Post loss capital requirements could increase as a major loss (or adverse claims development) could increase technical provisions and thus capital requirements. Large

market losses might also lead to a recalibration of the CAT modelling from European Insurance and Occupational Pensions Authority (EIOPA).

The main sensitivity going forward is changes in the parameters (standard deviations and correlations) or CAT modelling from EIOPA. The former could be addressed by using undertaking specific parameters, but this would give rise to increased model recalibration risk.

## **C.1.1 Non-Life underwriting risk**

Non-Life underwriting risk	2022	2021
Premium and reserve risk	138,515,123	128,838,837
Lapse risk	11,211,929	12,380,461
Catastrophe risk	28,366,150	32,746,966
Diversification	(29,495,236)	(32,776,230)
Total non-life underwriting risk	148,597,966	141,190,036

The standard model uses the net premium volume, the net claim reserve, the geographic spread, the product spread and the exposure to specific scenarios as the key risk drivers. The growth in premium explains the growth in underwriting risk. For internal purposes the risk is modelled using historic premium and claims data, stochastic simulation, various scenarios and comprehensive systems for modelling premium rate adequacy.

## C.1.1.1 Health underwriting risk

Health underwriting risk	2022	2021
Mortality risk	-	-
Longevity risk	-	-
Disability-morbidity risk	-	-
Lapse risk	-	-
Expense risk	-	-
Revision risk	-	-
Diversification	-	-
Total SLT health underwriting risk	-	-
Premium and reserve risk	4,210,630	3,405,540
Lapse risk	1,475,159	341,579
Diversification	(1,224,231)	(324,492)
Total NSLT health underwriting risk	4,461,558	3,422,627
Catastrophe risk	8,500,645	7,199,597
Diversification	(2,420,404)	(1,911,923)
Total health underwriting risk	10,541,798	8,710,301

## **C.1.2** Life underwriting risk

NHC does not write life insurance.

## C.2 Market risk

The table below lists the gross SCR for the Market risk, split by its sub risks.

Market risk	2022	2021
Interest rate risk	12,885,901	5,921,039
Equity risk	21,775,288	30,854,186
Property risk	16,625,591	14,471,529
Spread risk	10,312,712	17,507,789
Concentrations	-	-
Currency risk	8,677,349	4,193,413
Diversification	(21,115,196)	(14,654,403)
Total market risk	49,161,645	58,293,553

Market risk covers risk related to investments. Investments returns can fluctuate caused by changes in expected future economic conditions and changes to investor risk preferences. This affects real investments (equity and real estate) and nominal investments (fixed income) as both interest rates and risk premiums fluctuates as expectations changes.

NHC seeks to expose the portfolios to systematic market risk and have thus implemented highly diversified asset portfolios to diversify away specific company risks. All asset classes are highly diversified.

Spread risk is the risk that market pricing of credit risk increase. To reduce the spread risk, the bond portfolio shall have an adequate rating level from a holistic point of view.

The capital requirements for equity, property, spread, and currency risk are calculated as predefined shocks applied on the market value of these assets. The capital requirement for interest rate risk is also affected by size and duration of the technical provisions. The capital requirement for concentration risk is based on assets with a market value in excess of certain percentages of the overall investments. In addition to assuming asset class specific shocks, the model assumes specific correlations between the various asset classes.

## Measures used to assess the risk, material risks and changes the past year:

The standard model assesses the risk based on market value per asset class and assumptions regarding volatility per asset class. For internal purposes, the risk is also modelled based on historic volatility and stress testing.

## Investments according to the "prudent person principle"

NHC, and particularly the Investments-section of the finance department, shall carefully evaluate the merits of each investment in the investment portfolio, both on a stand-alone basis and its impact on the overall portfolio, in relation to the overall investment strategy, asset – liability management objective and liquidity objective. No investment shall be made unless the characteristics and impact of the security or fund is fully understood and evaluated.

In addition to the Investment section there are separate Risk Management and Accounting functions in order to secure independent reporting and control.

The interest rate duration of the investment grade portfolio is aligned with the duration of the insurance liabilities. Limits on interest rate risk deviations from benchmark are established as part of the investment strategy.

Currency risk is managed and hedged with US Dollars as base currency. NHC Equity and capital is measured in US Dollars. Calculation of foreign exchange risk is performed as an integral part of the preparation of the quarterly accounts. In case of major incidents, calculation shall be made on an ad-hoc basis. Major incidents are single incidents, originated in a non-USD currency, with an effect on the net result exceeding USD 5.0 mill.

NHC can deploy interest rate derivatives to efficiently adjust interest rate risk to desired levels and foreign exchange instruments to achieve targeted currency allocation. Furthermore, derivatives shall only be used to the extent that the instruments are fully understood and to the extent that the instruments can be adequately registered in the portfolio systems.

Diversification is a key feature in reducing the level of absolute risk and increase risk adjusted returns in the investment portfolio. Furthermore, the intention is to identify plurality of sources to potential income (and inherently risk) as a means of limiting the correlation risk. Investment risk is reduced by diversifying into several asset classes as defined by strategic asset allocation and the broad benchmarks adopted in the NHC strategy. Within the different asset classes, the portfolio is broadly

diversified on issuers, corporations, sectors and geographical areas. Retaining visibility and transparency of investments undertaken is important in this regard.

#### Investment concentration risk

Except for US and German sovereign risk, maximum exposure on any singly issuer shall not exceed 5 % of NHC equity. Concentration risk is managed as part of ordinary risk management of the investment portfolio.

## Risk mitigation and process for monitoring effectiveness

While USD is the base currency of operations, NHC writes policies in several other currencies, primarily EUR and NOK. NHC uses various contracts to manage currency risk related to the balance sheet. At a detailed level, it is inherently challenging to monitor the effectiveness of these contracts as the exact currency position is only known when full financial accounts are prepared each quarter.

Interest rate risk is primarily managed through allocation to asset classes and securities in the investment portfolio. For sake of efficiency, adjustments to interest rate risk may be made through financial contracts such as futures or swaps.

#### Sensitivity

The standard model is sensitive to input related market values, allocation to asset classes and duration and credit quality in the bond portfolio. There are no known issues related to the input that would result in a significant increase in the requirements if addressed differently.

Unlike underwriting risk, market risk has the feature that a market loss will reduce the capital requirement if investments are not reallocated to risky assets.

The main sensitivity going forward is changes in the parameters (standard deviations and correlations) from EIOPA.

## C.3 Credit risk

The table below lists the SCR for the Counterparty default risk/Credit risk:

Counterparty default risk	2022	2021
Type 1 exposures	16,822,332	13,388,511
Type 2 exposures	14,022,576	15,576,245
Diversification	(1,975,164)	(1,859,669)
Total counterparty default risk	28,869,745	27,105,088

Credit risk is handled separately for rated counterparts (type 1 risk) and unrated counterparts (type 2 risks). Rated counterparts include reinsurers, co-insurers and banks. This risk is dominated by default risks related to the default of reinsurers, co-insurers and banks. Unrated counterparts include policyholder's receivables (outstanding premium). The actual credit losses on policyholders have been low.

## Risk mitigation and process for monitoring the effectiveness

The risk related to policyholder receivables is reduced by continuous monitoring, setting off premium receivables for outstanding claims and cancellation of contracts. Consequently, the risk is considered significantly lower than modelled. The risk related to reinsurers is reduced by using reinsurance with minimum A-rating.

## Sensitivity

The standard model is sensitive to the interpretation of the type 2 credit risk model. A different interpretation could lead to a material reduction in this element of the capital requirement.

The type 1 credit risk is calculated based on the simplifications suggested by the Delegated Regulation. This underestimates the concentration on reinsurance recoverables from Lloyd's in the event of a worst-case marine loss. In the more realistic event that NHC is affected by 2-3 large (but not extreme) claims the modelling is reasonable.

## C.4 Liquidity risk

#### Model results and description of risks

There is no capital requirement for liquidity risk. Liquidity risk is the risk that NHC will not be able to meet obligations when due. The liquidity risk in the investment portfolio is considered low as most of the portfolio is invested in assets that under normal circumstances are highly liquid. These are government bonds, corporate bonds and public equities. Other types of investments, as real estate and private markets are considered to be illiquid, even though secondary markets are available for most of them.

Policyholder receivables (premium receivables and disbursements) is a large, illiquid asset. To some extent this can, however, be set off against outstanding claims.

## Risk mitigation and process for monitoring the effectiveness

NHC's reinsurance contracts has a "simultaneous payment clause" that transfers much of the liquidity risk to reinsurers (as reinsurance recoverable can be collected before payment is made to the assured). In addition, NHC has a credit facility with Nordea of 30 MUSD.

## **Expected profit in future premium**

Expected profit in future premiums (EPIFP) represents a small amount of own funds and the illiquidity of this asset has therefore no material effect on liquidity.

## **Expected profits included in future premiums**

(EPIFP)	2022	2021
EPIFP Life business	-	-
EPIFP Non-life business	31,717,719	31,805,101
Total EPIFP	31,717,719	31,805,101

## C.5 Operational risk

NHC has implemented an Operational Risk policy which describes how NHC is systematically identifying, assessing, mitigating, managing and reporting the operational risks. The document also describes the ownership of the operational risks and gives an overview of the control environment.

Operational risks can be defined as risk of loss resulting from inadequate or failed internal processes, people and systems, or from external events. Operational risks are included in the regulatory capital requirements of Solvency II and thus included in NHC's internal capital models.

Risk Management function facilitates an annual risk assessment process where all the departments in NHC identifies and assesses all the known risks. Risk Management function in cooperation with TMG selects the most critical risks which will be managed, monitored and reported on a quarterly basis. In addition to annual risk identification and evaluation process, managers are also responsible for continuously identifying and assessing other operational risks e.g related to projects, outsourcing etc.

All NHC employees are also responsible for identifying and reporting new emerging operational risks. Emerging risks are new risks or familiar risks that become apparent in new or unfamiliar conditions. Sources of emerging risks can be for example:

- Human
- Natural
- New technologies
- Economic, societal, environmental, regulatory or political changes

Risk owners are responsible for identifying relevant mitigating actions for operational risks and for implementing identified actions. Controls shall be put in place to limit the exposure of the risks and the potential damage caused by the risks. Risk owners shall also prepare contingent actions (actions to be taken if the risks materialize).

NHC has implemented a quarterly risk reporting process which is driven by the Risk Management function. The results of the risk reporting are provided to TMG and to Risk Committee.

The operational risk measurement system is complemented by a non-conformance reporting system, which is also documented and followed up in the internal total quality management system.

The capital requirement for operational risk is calculated as the maximum of 3% of the gross technical provisions and 3% of the earned gross premium the past 12 month, with an add-on if the premium has grown more than 20% the past 12 months.

## C.6 Other material risks

Risks described above are quantified through the Solvency II regulation (except for C.4 Liquidity risk). Below is a short description of other material risks.

#### **Climate Risk**

Globally, natural catastrophes are already the fifth biggest cause of marine insurance claims, by frequency and severity according to a recent report from Allianz. It has been projected that if extreme events, such as major tropical cyclones, flooding, wildfires and heatwaves, will increase in frequency and intensity going forward. Various statistics already that the number of extreme events is on the rise.

Consequently, climate risks are high on the agenda for NHC and included in the Board's own annual risk and solvency assessment. The assessment concluded that the main short-term effect identified was related to inflation, which is likely to be exacerbated by the transition to a green economy. Longer term, the assessment acknowledges larger changes in risk, due to increased frequency, severity and volatility of extreme weather events.

Due to this and the possibility of increases in frequency and size of claims, NHC will continually monitor and assess climate risk together with the evolvement of guidelines/tools from external sources and supervisory authorities. NHC has also implemented various actions to better assess climate risk and its impact on business including the underwriting, claims handling, loss prevention and investment management processes.

## Loss absorbing capacity of deferred tax

The Solvency II regulation assumes a loss absorbing capacity of deferred tax. The issue has been considered through NHC's annual ORSA process. The conclusion was that the loss absorbing capacity of deferred tax is questionable as the taxable result can deviate substantially from the operating result. If an extreme loss scenario is combined with strong USD appreciation (as during the financial crisis) the taxable result can be positive even though the net operating result is negative. No loss absorbing capacity of deferred tax is thus assumed.

#### **Diversification effects**

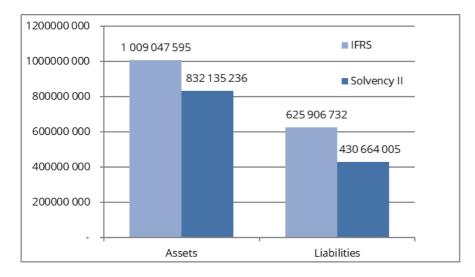
It is highly unlikely that worst case scenarios in all the various risk classes occur simultaneously. The standard model thus assumes a certain correlation between the various risks in order to reduce the overall risk for diversification benefits.

## C.7 Any other information

No other material information regarding risk to disclose.

## D Valuation for solvency purposes

The chart below displays a summary of assets and liabilities, listed per the valuation for solvency purposes and per valuation in the annual report.



The following chapters describe potential differences between the valuation of assets and liabilities according to the Solvency II regulation and valuation principles used in the annual report.

## **D.1** Assets

The below table shows assets per material class (table 02.01.02 in the appendix contains further details).

Assets	IFRS	Solvency II	Delta
Intangible assets	-	-	-
Deferred tax assets	-	-	-
Financial investments	536,718,771	536,714,433	(4,338)
Index and unit linked investments	-	-	-
Loans and mortgages	7,701,693	7,701,693	_
Reinsurance recoverables	98,527,436	58,643,598	(39,883,838)
Cash and cash equivalents	122,648,991	122,648,990	(1)
Other assets	243,450,703	106,426,522	(137,024,181)
Total assets	1,009,047,595	832,135,236	(176,912,359)

Assets are valued based on the assumption that the undertaking will pursue its business as a going concern and are valued in conformity with international accounting standards. Assets are valued according to quoted market prices in active markets, if available. Where the use of quoted market prices is not possible, NHC use quoted market prices for similar assets and liabilities with adjustments to reflect differences. The use of alternative valuation methods makes maximum use of relevant market inputs and rely as little as possible on undertaking-specific inputs.

According to Norwegian generally accepted accounting principles there are some exemptions to common assessment and valuation principles. Comments to these exemptions follow below.

## **D.1.1 Financial investments**

NHC uses the opportunity that is given insurance companies in "Regulations for annual accounts for insurance companies approved by the Norwegian Ministry of Finance" to present all financial assets at fair value through profit and loss in accordance with the fair value option, if not otherwise decided before investment in a financial asset is made. This means that the fair value adjustments on financial assets are recognized in income before other comprehensive income.

Financial instruments are valued at fair market value. Such financial instruments are equities (both listed and unlisted), bonds

and other interest generating investments, real estate funds and money market funds. Foreign exchange contracts are valued at fair market value as well.

Regular purchases and sales of financial assets are recognized on the trade date. Investments are initially recognized at fair value plus transaction costs for all financial assets not carried at fair value through profit or loss. Financial assets carried at fair value through profit or loss are initially recognized at fair value and transaction costs are expensed in the income statement. Financial assets are derecognized when the rights to receive cash flows from the investments have expired or have been transferred and NHC has transferred substantially all risks and rewards of ownership. Realized gains / losses on financial instruments are presented on a separate line in the statement of comprehensive income. Interest and dividends income are included in financial income for financial assets at fair value through profit and loss.

#### Investments

Note 7 in the annual report set out an overview of the carrying and fair values of NHC's financial instruments and the accounting treatment of these instruments as defined in IAS 39.

## Fair value hierarchy

Government bonds, corporate bonds and other financial instruments that are traded in active markets where the fair value is determined based on quoted market prices at the balance sheet date, are classified on level 1 in the pricing hierarchy. A market is regarded as active if quoted prices are readily and regularly available from an exchange, dealer, broker, industry group, pricing service, or regulatory agency, and those prices represent actual and regularly occurring market transactions on an arm's length basis.

The fair value of financial instruments that are not traded in an active market is determined by using valuation techniques. These valuation techniques maximize the use of observable market data where it is available and rely as little as possible on entity specific estimates. If all significant inputs required to value an instrument are observable, the instrument is included in level 2. Investments listed in the following have been classified on level two in the pricing hierarchy.

With regards to Equity funds, government bond funds, corporate bond funds and high yield bond funds these values are determined based on the quoted market prices of the assets the funds have invested in. For currency futures, interest rate futures, stock and equity options, credit default swaps and currency swaps, values determined based on the price development on an underlying asset or instrument. The before mentioned categories of derivatives are being priced by using standard and well recognized methods of pricing like option pricing models etc.

If one or more of the significant inputs is not based on observable market data, the instrument is included in level 3. Investments listed in the following have been classified on level three in the pricing hierarchy.

#### **Unlisted Private Equity and Private Loans investments**

All of these are either investment in funds or in fund of funds. Values are determined based on quarterly NAV (Net Asset Value) reports from the fund managers. These reports are prepared based on the IPEV (International Private Equity and Venture Capital Valuation) guidelines set forth by the Equity Venture Capital Association or corresponding guidelines in the respective jurisdiction of the underlying funds. NAVs are calculated by the fund managers by making use of those methods of pricing in the IPEV and similar guidelines that are most suited to estimate actual value for each type of asset subject all relevant factors. Due to late reporting, NAVs as per the last quarterly reports are used in the accounts. The NAV from the most recent quarterly report is adjusted for capital distributions and/or capital calls in the period until 31st of December and might be adjusted if incidents of material character have occurred during the period since last reporting date. An example in this respect could be a substantial change in the market value of a listed company a Private Equity fund has invested in.

#### **Real Estate funds**

As for Private Equity, values are determined based on quarterly NAV reports from the fund managers. Minimum yearly, the values of all properties in the funds are assessed by a publicly authorized real estate agent or valuator. The assessed values of the properties adjusted for other assets and liabilities, and if relevant expected cash flow (for example differentials due to future requirements and/or regulation that will impact the future cash flow of the properties) make up the basis for the NAVs.

## **D.1.2** Holdings in related undertakings

Shares in subsidiaries are valued using the cost method in the NHC accounts. Cost increases when the parent gives the subsidiary increased equity capital by subscription for share issue or group contribution. Dividends / group contribution received is normally recognized as income, but only to the extent that dividends / group contribution received from subsidiary does not exceed the share of retained earnings in the subsidiaries after the purchase. Received dividends / group contributions in excess of this amount are recorded as a reduction of the acquisition cost. NHC records received dividend / group contributions the same year as the subsidiary makes the provisions. Associated companies are valued using the equity method.

Further details are available in Note 7 in the annual report.

#### **D.1.3 Loans and mortgages**

Employee loans are accounted for at face value with deductions for expected loss. At year end there were no deductions made.

#### **D.1.4 Reinsurance recoverables**

Reinsurance recoverables are current reinsurance recoverables due to claims.

#### D.1.5 Cash and cash equivalents

USD is NHC's functional and presentation currency. Receivables and liabilities (including technical insurance obligations) in foreign currencies are translated into USD at the year-end exchange rates. Foreign exchange gains and losses that relate to payables, receivables and cash and cash equivalents are presented in the statement of comprehensive income under financial income or costs as currency gain/loss. All other foreign exchange gains and losses are posted in the statement of comprehensive income under items they relate to. Securities and financial instruments in other currencies are valued in USD at the year-end exchange rates.

#### D.1.6 Other assets

Other assets consist mainly of receivables and property, plant & equipment held for own use.

#### Intangible assets

NHC has no intangible assets on the balance sheet.

#### Material deferred taxes

NHC has no deferred tax assets.

#### **Receivables**

Receivables are accounted for at face value with deductions for expected loss.

#### Property, plant & equipment

Property, plant & equipment are recorded in the accounts at historical cost less depreciation. Historical cost includes expenditure that is directly attributable to the acquisitions of the items. Depreciation is calculated using the straight-line method. Upgrading of rented office premises is depreciated over the rent period. If the fair value of a fixed asset is lower than book value, and the decline is not temporary, the fixed asset will be written down to fair value. Depreciation is classified as other insurance related expenses.

## D.1.7 Explanation of material differences between Solvency II and Statutory Values

### **Reinsurance Recoverables**

The Solvency II reinsurance recoverables are reduced for expected losses on reinsurance, expected profit to reinsurers and discounting. In addition, the recoverables reflect contract boundaries as defined by the Solvency II directive and thus include policies with inception in the beginning of the next year and multi-year contracts. This also reduces the recoverables as expected claims are lower than expected premium. In addition to these revaluations "reinsurance payables" are deducted from the recoverables. The latter is the most material difference but does not affect own funds as there is no "reinsurance payables" liability on the Solvency II balance sheet.

## Insurance and intermediaries' receivables

In the Solvency II balance sheet undue premium receivables are deducted from the premium provision and thus reduce this liability. This part of the receivables is therefore removed from the assets. This is a reclassification and therefore does not affect own funds.

#### D.1.8 Changes to valuation bases during period

No changes to valuation bases during the period.

## **D.2** Technical provisions

The table below shows the valuation of technical provisions, for solvency purposes and the valuation in financial statements.

Technical provisions	IFRS	Solvency II	Delta
Technical provisions non-life	499,189,559	321,526,342	(177,663,217)
Best estimate		302,473,237	
Risk margin		19,053,105	
Technical provisions life (ex. index-linked and unit-linked)	-	-	-
Best estimate		-	
Risk margin		-	
Technical provisions index-linked and unit-linked	-	-	-
Best estimate		-	
Risk margin		-	
Other technical provisions	-		-
Total technical provisions	499,189,559	321,526,342	(177,663,217)

## **D.2.1 Life technical provisions**

NHC does not write life-insurance.

#### **D.2.2 Non-Life technical provisions**

The table below displays the valuation for solvency purposes for technical provisions split by Marine and Medical Insurance.

		2022			2021	
Non-Life	Technical provisions	Best estimate (gross)	Risk margin	Technical provisions	Best estimate (gross)	Risk margin
Medical expense insurance	7,932,318	7,462,262	470,056	6,312,964	5,875,004	437,960
Income protection insurance	-	-	-	-	-	-
Workers' compensation insurance	-	-	-	-	-	-
Motor vehicle liability insurance	-	-	-	-	-	-
Other motor insurance	-	-	-	-	-	-
Marine, aviation and transport insurance	313,594,025	295,010,975	18,583,049	240,418,820	223,739,846	16,678,974
Fire and other damage to property insurance	-	-	-	-	-	-
General liability insurance	-	-	-	-	-	-
Credit and suretyship insurance	-	-	-	-	-	-
Legal expenses insurance	-	-	-	-	-	-
Assistance	-	-	-	-	-	-
Miscellaneous financial loss	-	-	-	-	-	-
Non-proportional health reinsurance	-	-	-	-	-	-
Non-proportional casualty reinsurance	-	-	-	-	-	-
Non-proportional marine, aviation and transport reinsurance	-	-	-	-	-	-
Non-proportional property reinsurance	-	-	-	-	-	-
Total Non-Life	321,526,342	302,473,237	19,053,105	246,731,784	229,614,850	17,116,934

#### Best estimates, risk margins, methods and assumptions

The premium provision covers future claims on written policies. The provision is very low as premium receivables are deducted from the expected claims. The net provision is negative as parts of the reinsurance program is paid up-front, and the net future cash-flow from reinsurance is therefore positive.

The claims provisions cover incurred but not settled claims. The provision is calculated based on case estimates and IBNR reserves based on the Benktander method for most lines of business. The provisions are discounted based on risk free interest rates in three currencies.

The risk margin is an additional margin to make the overall provision sufficient for a third party to accept to take over the liability. The risk margin is calculated according to the Cost of Capital method with a Cost-of-Capital rate of 6%, in line with the Delegated Regulation.

#### Level of uncertainty

The premium provision covers future claims on written policies. As marine insurance is a high severity line of business, the level of uncertainty associated with this provision is very high.

The uncertainty of the claim provision is assessed based on historic run off results. The net run off result has been negative the past 5 years after 5 years of positive results. The average loss the past 5 years is 3,4 MUSD. The run-off standard deviation the past 10 years is 8 MUSD.

### D.2.3 Technical provisions split between line of business

	2022			2021		
Non-Life	Technical provisions	Best estimate (gross)	Risk margin	Technical provisions	Best estimate (gross)	Risk margin
Medical expense insurance	7 932 318	7 462 262	470 056	6 312 964	5 875 004	437 960
Marine, aviation and transport insurance	313 594 025	295 010 975	18 583 049	240 418 820	223 739 846	16 678 974
Total Non-Life	321 526 342	302 473 237	19 053 105	246 731 784	229 614 850	17 116 934

## D.2.4 Material differences between valuation for Solvency purposes and financial statement

## **Premium provision:**

	Solvency II	Statutory Accounts	Comment
Unearned Gross Premium	166 430 661	166 430 661	
Expected Profit in unearned premium	-24 531 481		Negative = profit
Expected Profit in written 2023 business	-7 784 011		Negative = profit
Expected Profit in long term policies	-4 081 860		Negative = profit
Non due premium receivables	-137 024 181	0	Reclassification
Discounting	-7 549 145		
Gross Premium Provision	-14 540 018	166 430 661	

The most important difference between the Solvency II valuation and the Statutory Accounts is that non due premium receivables are deducted from the former. This difference represents a reclassification (rather than a revaluation) and therefore does not affect own funds. This makes the Solvency II Premium Provision hard to interpret. In addition, expected profit in future premium is deducted.

## **Claims Provision**

The Solvency II claim provisions are discounted. This reduces the reserves by 5% compared to the Statutory Accounts.

## **Risk Margin**

There is no risk margin in the Statutory Accounts.

#### **Adjustments**

None of the available measures to reduce the provisions have been applied (matching adjustment, volatility adjustment, transitional term structure, transitional deduction).

#### **Recoverables from reinsurance contracts**

In the statutory accounts, recoverables from reinsurance equals the unearned reinsurance premium and the reinsurers' share of the gross claim's provisions. The latter is based on reinsurer's share of incurred, but not settled claims on a case-by-case basis and reinsurers' estimated share of the IBNR claims. The Solvency II recoverables are based on an adjusted version of the statutory accounts (allowing for discounting, expected counterparty losses, expected reinsurer profit and extended contract boundaries). The adjustments are described in Section D.1 above.

## Changes during the year

There are no material changes in the calculation of technical provisions during the year.

## **D.3 Other liabilities**

The below table shows other liabilities:

Liabilities	IFRS	Solvency II	Delta
Technical provisions	499,189,559	321,526,342	(177,663,217)
Pension obligations	3,123,685	3,123,685	-
Deferred tax liabilities	37,384,352	44,112,672	6,728,320
Derivatives	2,492,768	2,492,768	-
Financial liabilities	-	-	-
Subordinated liabilities	-	-	-
Other liabilities	83,716,368	59,408,538	(24,307,830)
Total liabilities	625,906,732	430,664,005	(195,242,727)

#### **Pension obligations**

The liability recognised in the balance sheet in respect of defined benefit pension plans is the present value of the defined benefit obligation at the end of the reporting period. This is pension obligations for some pensioners. These are non-funded obligations.

## Deferred tax and tax expense

Deferred tax is calculated based on temporary differences between book values and tax basis for assets and liabilities at year-end. For the purpose of calculating deferred tax, nominal tax rates are used. Taxable and deductible temporary differences are offset to the extent they reverse within the same time frame. However, deferred tax liabilities on net pension assets are treated separately. Temporary differences that will constitute a future tax deduction give rise to a deferred tax asset. Change in deferred tax liability and deferred tax asset, together with taxes payable for the fiscal year adjusted for errors in previous year's tax calculations constitutes tax expenses for the year. The difference between IFRS and Solvency II is due to the difference in the valuation of the technical provisions (lower reserves triggers higher tax).

#### **Derivatives**

Derivatives relates to market values of currency derivatives as of 31.12.2022.

## Other liabilities

Other liabilities consist mainly of "Insurance & intermediaries payables", "Payables (trade, not insurance)", "Reinsurance payables" and "Any other liabilities, not elsewhere shown". There is only difference in the classification of reinsurance payables.

#### Reinsurance payable - Reclassification

In the Solvency II balance sheet the liability "reinsurance payables" is deducted from the asset "reinsurance recoverables". This does not affect own funds.

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

Covered under D.1 for assets

## D.5 Any other information

There is no other material information to be disclosed regarding the valuation for solvency purposes.

## **E Capital Management**

The different contributing elements to SCR and MCR are represented in the table below. The below table also includes the total SCR/MCR and corresponding ratios.

	Eligible Own Funds
	Capital Requirement
Ξ	Difference
	Ratio

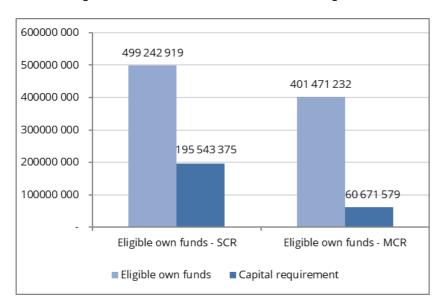
2022		
SCR	MCR	
499,243	401,471	
195,543	60,672	
303,700	340,799	
255%	662%	

2021		
SCR	MCR	
486,4	424 391,240	
190,3	368 47,592	
296,0	343,648	
25	66% 822%	

The increase in Own Funds and Capital Requirement is partly due to increased premium volume. The increased premium increases Own Funds through increased profit in future premium and increased Ancillary Tier 2 Capital (supplementary mutual members calls) and also increase the underwriting risk. In addition, own funds increase due to retained earnings. The SFCR report and accounts assumes 13,6 MUSD to be returned to members as mutual member premium return.

## E.1 Own funds

The following chart shows an overview of the own funds figures:



Own funds are currently a mix of unrestricted Tier 1 capital and supplementary mutual calls as Tier 2 (ancillary) capital. Additional premium has not been called since 1947 and is considered an option of last resort. In addition, the following factors affects the development of own funds: The operating result, deferred tax, change in expected profit in future premium, changes in the effect of discounting reserves, changes in expected losses on reinsurance receivables.

#### **E.1.1 Capital management**

NHC has a target of 50% margin in excess of the highest of the S&P capital requirement and the Solvency II SCR. If the margin drops below 25%, risk-reducing measures will be implemented.

A basic assumption in all capital planning and risk management is that NHC shall not have to or rely on making a supplemental call on mutual members, i.e., calling extra premium in order to meet insurance liabilities.

## Material Differences between NHC's financial statement equity and Own funds

The differences between the Solvency II balance sheet and the Statutory accounts are a mix of reclassifications and revaluations. The following table shows the effect on own funds:

	To Cover SCR	To Cover MCR
Statutory Equity	383 143 503	383 143 503
Discounting Claim Reserve	12 312 491	12 312 491
Risk Margin	-19 053 105	-19 053 105
Expected profit future premium	31 803 641	31 803 641
Increased deferred tax	-6 728 319	-6 728 319
Supplemental mutual calls	97 771 687	-
Solvency II Value	499 242 919	401 471 232

#### E.1.2 Own funds tiers - SCR

Eligible own funds SCR	2022	2021
Tier 1 (unrestricted)	401,471,232	391,240,130
Tier 1 (restricted)	-	-
Tier 2	97,771,687	95,184,083
Tier 3	-	-
Total eligible own funds SCR	499,242,919	486,424,213

Supplementary Members Calls are included as Tier 2 capital.

## E.1.3 Own funds tiers - MCR

Eligible own funds MCR	2022	2021
Tier 1 (unrestricted)	401,471,232	391,240,130
Tier 1 (restricted)	-	-
Tier 2	-	-
Tier 3		
Total eligible own funds MCR	401,471,232	391,240,130

Supplementary Members Calls (ancillary tier 2 capital) do not contribute to the capital eligible to meet the MCR requirement.

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

Split by risk modules, the table below displays information about the SCR breakdown.

SCR risk modules	2022	2021
Market risk	49,161,645	58,293,553
Counterparty default risk	28,869,745	27,105,088
Life underwriting risk	-	-
Health underwriting risk	10,541,798	8,710,301
Non-life underwriting risk	148,597,966	141,190,036
Diversification	(51,412,177)	(52,960,083)
Basic Solvency Capital Requirement	185,758,978	182,338,894
Operational Risk	9,784,397	8,029,271
Loss-absorbing capacity of technical provisions	-	-
Loss-absorbing capacity of deferred taxes	-	-
Solvency Capital Requirement (SCR)	195,543,375	190,368,165
Minimum Capital Requirement (MCR)	60,671,579	47,592,041

The MCR is calculated per line of business as the sum of the written net premium multiplied by a premium risk factor and the net technical provisions per line of business multiplied by a reserving risk factor. The total MCR equals the sum of the MCR per line of business. MCR is designed to lie between 25% and 45% of SCR. The low MCR/SCR ratio suggests a high SCR. This is caused by the high capital charge in the Marine Line of Business and risk taking in areas that are not explicitly reflected in the MCR (investment risk and credit risk).

**E.3** Use of duration based equity risk sub module in the calculation of the SCR NHC does not apply the duration based approach.

E.4 Differences between the standard formula and any internal model used NHC does not use an internal model.

## E.5 Non-compliance with the minimum capital requirement and non-compliance with the solvency capital requirements

NHC has sufficient amount of capital to meet the capital requirements.

## E.6 Any other information

NHC applies the simplifications described in Article 107, 110, 111, 112 of the Delegated Regulation.

## **Appendix**

As part of the SFCR, undertakings are expected to disclose the templates attached in this Appendix. The monetary amounts are disclosed in thousands of units.

## S.02.01.02 - Balance Sheet

		Solvency II value
ssets		C0010
Intangible assets	R0030	
Deferred tax assets	R0040	
Pension benefit surplus	R0050	
Property, plant & equipment held for own use	R0060	15,29
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	536,71
Property (other than for own use)	R0080	
Holdings in related undertakings, including participations	R0090	10,72
Equities	R0100	
Equities - listed	R0110	
Equities - unlisted	R0120	
Bonds	R0130	392,94
Government Bonds	R0140	222,92
Corporate Bonds	R0150	170,0
Structured notes	R0160	
Collateralised securities	R0170	
Collective Investments Undertakings	R0180	132,7
Derivatives	R0190	31
Deposits other than cash equivalents	R0200	
Other investments	R0210	
Assets held for index-linked and unit-linked contracts	R0220	
Loans and mortgages	R0230	7.7
Loans on policies	R0240	,,,,
Loans and mortgages to individuals	R0250	
Other loans and mortgages	R0260	7,70
Reinsurance recoverables from:	R0270	58,6
Non-life and health similar to non-life	R0280	58,6
Non-life excluding health	R0290	58,5
Health similar to non-life	R0300	
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	
Health similar to life	R0320	
Life excluding health and index-linked and unit-linked	R0330	
Life index-linked and unit-linked	R0340	
Deposits to cedants	R0350	
Insurance and intermediaries receivables	R0360	70.8
Reinsurance receivables	R0370	1,7
Receivables (trade, not insurance)	R0380	17,1
	R0390	17,14
Own shares (held directly)		
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400 R0410	122.0
Cash and cash equivalents		122,64
Any other assets, not elsewhere shown total assets	R0420 R0500	1,37 832,13

#### S.02.01.02 - Balance Sheet

Excess of assets over liabilities

#### value Liabilities Technical provisions - non-life R0510 321,526 Technical provisions - non-life (excluding health) R0520 313,594 Technical provisions calculated as a whole R0530 Best Estimate R0540 295.011 Risk margin R0550 18.583 Technical provisions - health (similar to non-life) R0560 7,932 Technical provisions calculated as a whole R0570 Best Estimate R0580 7,462 Risk margin R0590 470 Technical provisions - life (excluding index-linked and unit-linked) R0600 Technical provisions - health (similar to life) R0610 Technical provisions calculated as a whole R0620 Best Estimate R0630 R0640 Risk margin Technical provisions – life (excluding health and index-linked and unit-linked) R0650 Technical provisions calculated as a whole R0660 Best Estimate R0670 R0680 Risk margin Technical provisions - index-linked and unit-linked R0690 Technical provisions calculated as a whole R0700 Best Estimate R0710 Risk margin R0720 Contingent liabilities R0740 Provisions other than technical provisions R0750 Pension benefit obligations R0760 3,124 Deposits from reinsurers R0770 Deferred tax liabilities R0780 44,113 R0790 Derivatives 2,493 Debts owed to credit institutions R0800 Financial liabilities other than debts owed to credit institutions R0810 11,596 Insurance & intermediaries payables R0820 Reinsurance payables R0830 Payables (trade, not insurance) R0840 21,617 Subordinated liabilities R0850 Subordinated liabilities not in Basic Own Funds R0860 Subordinated liabilities in Basic Own Funds R0870 Any other liabilities, not elsewhere shown R0880 26,195 **Total liabilities** R0900 430,664

401,471

R1000

Solvency II

Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)

	,	Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance
		C0010	C0020	C0030	C0040
Premiums written					
Gross - Direct Business	R0110	16,838	-	-	
Gross - Proportional reinsurance accepted	R0120	2,821	-	-	
Gross - Non-proportional reinsurance accepted	R0130				
Reinsurers' share	R0140	(348)	-	-	
Net	R0200	20,007	-	-	
Premiums earned	_				
Gross - Direct Business	R0210	15,847	-	-	
Gross - Proportional reinsurance accepted	R0220	2,742	-	-	
Gross - Non-proportional reinsurance accepted	R0230				
Reinsurers' share	R0240	(348)	-	-	
Net	R0300	18,937	-	-	
Claims incurred	_				
Gross - Direct Business	R0310	11,162	-	-	
Gross - Proportional reinsurance accepted	R0320	2,727	-	-	
Gross - Non-proportional reinsurance accepted	R0330				
Reinsurers' share	R0340	(93)	-	-	
Net	R0400	13,982	-	-	
Changes in other technical provisions					
Gross - Direct Business	R0410	-	-	-	
Gross - Proportional reinsurance accepted	R0420	-	-	-	
Gross - Non-proportional reinsurance accepted	R0430				
Reinsurers' share	R0440	-	-	-	
Net	R0500	-	-	-	
Expenses incurred	R0550	190	-	-	
Other expenses	R1200				
Total expenses	R1300				

Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)

	_	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance
	_	C0050	C0060	C0070	C0080
Premiums written					
Gross - Direct Business	R0110		- 275,133	-	
Gross - Proportional reinsurance accepted	R0120		- 33,118	-	
Gross - Non-proportional reinsurance accepted	R0130				
Reinsurers' share	R0140		- 58,267	-	
Net	R0200		- 249,984	-	
Premiums earned					
Gross - Direct Business	R0210		- 270,674	-	
Gross - Proportional reinsurance accepted	R0220		- 34,395	-	
Gross - Non-proportional reinsurance accepted	R0230				
Reinsurers' share	R0240		- 58,964	-	
Net	R0300		- 246,106	-	
Claims incurred	-				
Gross - Direct Business	R0310		- 197,119	-	
Gross - Proportional reinsurance accepted	R0320		- 20,606	-	
Gross - Non-proportional reinsurance accepted	R0330				
Reinsurers' share	R0340		- 49,192	-	
Net	R0400		- 168,533	-	
Changes in other technical provisions	-				
Gross - Direct Business	R0410			-	
Gross - Proportional reinsurance accepted	R0420			-	
Gross - Non-proportional reinsurance accepted	R0430				
Reinsurers' share	R0440			-	
Net	R0500			-	
Expenses incurred	R0550		- 44,704	-	
Other expenses	R1200				
Total expenses	R1300				

Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)

	_	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneou financial loss
	_	C0090	C0100	C0110	C0120
Premiums written					
Gross - Direct Business	R0110				-
Gross - Proportional reinsurance accepted	R0120				-
Gross - Non-proportional reinsurance accepted	R0130				
Reinsurers' share	R0140				-
Net	R0200				-
Premiums earned	_				
Gross - Direct Business	R0210				-
Gross - Proportional reinsurance accepted	R0220				-
Gross - Non-proportional reinsurance accepted	R0230				
Reinsurers' share	R0240				-
Net	R0300				-
Claims incurred	_				
Gross - Direct Business	R0310				-
Gross - Proportional reinsurance accepted	R0320				-
Gross - Non-proportional reinsurance accepted	R0330				
Reinsurers' share	R0340				-
Net	R0400				-
Changes in other technical provisions	_				
Gross - Direct Business	R0410				-
Gross - Proportional reinsurance accepted	R0420				-
Gross - Non-proportional reinsurance accepted	R0430				
Reinsurers' share	R0440				-
Net	R0500				-
Expenses incurred	R0550				-
Other expenses	R1200				
Total expenses	R1300				

## Line of Business for: accepted non-proportional reinsurance

			reinsura	ance		
		Marine,				
		Health	Casualty	aviation,	Property	
			-	transport		
	_	C0130	C0140	C0150	C0160	C0200
Premiums written						
Gross - Direct Business	R0110					291,971
Gross - Proportional reinsurance accepted	R0120					35,939
Gross - Non-proportional reinsurance accepted	R0130			-	-	
Reinsurers' share	R0140			-	-	57,919
Net	R0200			-	-	269,991
Premiums earned	_					
Gross - Direct Business	R0210					286,521
Gross - Proportional reinsurance accepted	R0220					37,138
Gross - Non-proportional reinsurance accepted	R0230			-	-	
Reinsurers' share	R0240			-	-	58,616
Net	R0300			-	-	265,043
Claims incurred						
Gross - Direct Business	R0310					208,28°
Gross - Proportional reinsurance accepted	R0320					23,334
Gross - Non-proportional reinsurance accepted	R0330			-	-	
Reinsurers' share	R0340			-	-	49,099
Net	R0400			-	-	182,51
Changes in other technical provisions						
Gross - Direct Business	R0410					
Gross - Proportional reinsurance accepted	R0420					
Gross - Non-proportional reinsurance accepted	R0430			-	-	
Reinsurers' share	R0440			-	-	
Net	R0500			-	-	
Expenses incurred	R0550			-1	-	44,894
Other expenses	R1200					,
Total expenses	R1300					44,894
	_					

S.05.01.02 - Premiums, claims and expenses by line of business

	_	Line of Business for: life insurance obligations						
		Health insurance	Insurance with profit participa- tion	Index-linked and unit- linked insurance	Other life insurance	Annuities stemming from non-life insurance contracts and relating to health insurance obligations		
	_	C0210	C0220	C0230	C0240	C0250		
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							

		Line of Business for: life insurance obligations	Life reinsuran		
		Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations	Health reinsurance	Life reinsurance	Total
Burnet and the second s		C0260	C0270	C0280	C0300
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				-

**Top 5 countries Total Top 5** Home (by amount of gross premiums written) and home Country non-life obligations country C0010 C0020 C0040 C0060 UNITED UNITED **GERMANY FRANCE GREECE** KINGDOM STATES **Premiums written** 173,864 Gross - Direct Business 37,516 41394 27988 23828 24155 18982 Gross - Proportional reinsurance 236 3384 400 6,386 2,201 135 29 accepted Gross - Non-proportional reinsurance R0130 accepted Reinsurers' share 9,913 7646 2377 8044 3657 2298 33,935 Net 29,805 33984 25746 19168 20527 17085 146,315 **Premiums earned** 21393 Gross - Direct Business 44,763 39760 22403 18898 19373 166,590 Gross - Proportional reinsurance 300 2781 8,931 2,232 243 3349 26 accepted Gross - Non-proportional reinsurance R0230 accepted 10,757 2914 4900 3186 2486 Reinsurers' share 7521 31,764 19669 17347 18233 Net 36,238 32482 19789 143,757 **Claims incurred** Gross - Direct Business R0310 19449 19421 13838 14989 13465 118,905 37,743 Gross - Proportional reinsurance 2501 1,635 313 67 2921 7,437 accepted Gross - Non-proportional reinsurance accepted 32,662 Reinsurers' share 947 304 2091 214 50 36,268 R0400 18815 19184 12898 15915 90,074 Net 6,716 16545 Changes in other technical provisions Gross - Direct Business Gross - Proportional reinsurance accepted Gross - Non- proportional reinsurance accepted Reinsurers' share Net 5305 2928 5,810 3217 2745 2770 **Expenses incurred** 22,773 R1200 Other expenses

R1300

**Total expenses** 

22,773

# S.05.02.01 - Premiums, claims and expenses by country

		Home Country	(by	amount of	op 5 countri gross pren fe obligatio	niums writ	ten)	Total Top 5 and home country
		C0150	C0160	C0170	C0180	C0190	C0200	C0210
	R1400		0					
Premiums written		C0220	C0230	C0240	C0250	C0260	C0270	C0280
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							-

### S.17.01.02 - Non-life Technical Provisions

			irect busines	s and accepte	ed proportion	al reinsuran	ce
		Medical expense insurance	Income protection insurance	Workers' compensa tion insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance
		C0020	C0030	C0040	C0050	C0060	C0070
Technical provisions calculated as a whole	R0010	-	-	-	-	_	-
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole	R0050	-	-	-	-	-	-
Technical provisions calculated as a sum of BE and RM							
Best estimate							
Premium provisions	.						
Gross	R0060	(2,489)	-	-	-	-	(12,051)
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140	-	-	-	-	-	(7,907)
Net Best Estimate of Premium	.						
Provisions	R0150	(2,489)	-	-	-	-	(4,144)
Claims provisions							
Gross	R0160	9,951	-	-	-	-	307,062
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240	81	-	-	-	-	66,470
Net Best Estimate of Claims	R0250	9,870	_	_	_	_	240,592
Provisions	.						
Total Best estimate - gross	R0260	7,462	-	-	-	-	295,011
Total Best estimate - net	R0270	7,381	-	-	-	-	236,448
Risk margin	R0280	470	-	-	-	-	18,583
Amount of the transitional on							
Technical Provisions  Technical Provisions calculated as a whole	R0290	-	-	-	-	-	
Best estimate	R0300						
Risk margin	R0300						
Technical provisions - total		_	_	_	-		
Technical provisions - total	R0320	7,932	_	_	_	_	313,594
Recoverable from reinsurance		7,532					313,33
contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	R0330	81	-	-	-	-	58,563
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	R0340	7,851	-	-	-	-	255,031

### S.17.01.02 - Non-life Technical Provisions

		D	irect busines	ss and accepto	ed proportion	nal reinsuranc	e
		Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscella- neous financial loss
		C0080	C0090	C0100	C0110	C0120	C0130
Technical provisions calculated as a whole	R0010	-	-	-	-	-	
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole	R0050	-	-	-	-	-	
Technical provisions calculated as a sum of BE and RM	-						
Best estimate	-						
Premium provisions	-						
Gross	R0060				_	_	
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for	R0140	_		_	_	-	
expected losses due to counterparty default  Net Best Estimate of Premium	- R0150						
Provisions	KU150	-	-	_	-	-	•
Claims provisions	-						
Gross	R0160	-	-	-	-	-	
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240	-	-	-	-	-	
Net Best Estimate of Claims	R0250	_	-	_	_	_	
Provisions	_						
Total Best estimate - gross	R0260	-		-	-	-	•
Total Best estimate - net	R0270	-		-	-	-	•
Risk margin  Amount of the transitional on  Technical Provisions	R0280	-		-	-	-	
Technical Provisions calculated as a whole	R0290	-	-	-	-	-	
Best estimate	R0300	-		-	-	-	
Risk margin	R0310	-		-	-	-	
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	R0320	-		-	-	-	
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	R0340	-	-	-	-	-	

### S.17.01.02 - Non-life Technical Provisions

		Acce	oted non-propo	ortional reinsu	rance	
		Non- proportional health reinsurance	Non- proportional casualty reinsurance	Non- proportional marine, aviation and transport reinsurance	Non- proportional property reinsurance	Total Non- Life obligation
		C0140	C0150	C0160	C0170	C0180
Technical provisions calculated as a whole	R0010	-	-	-	-	-
Total Recoverables from reinsurance/SPV and	-					
Finite Re after the adjustment for expected	R0050					
losses due to counterparty default associated	K0030	_	_	_	-	
to TP calculated as a whole						
Technical provisions calculated as a sum of	_					
BE and RM						
Best estimate	_					
Premium provisions	_					
Gross	R0060	-	-	-	-	(14,540)
Total recoverable from	_					
reinsurance/SPV and Finite Re after	R0140					(7,907
the adjustment for expected losses	KU140	_	_	_		(7,507
due to counterparty default						
Net Best Estimate of Premium	R0150					(6,633)
Provisions				_		(0,055)
Claims provisions						
Gross	R0160	-	-	-	-	317,013
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240	-	-	_	-	66,551
Net Best Estimate of Claims Provisions	R0250	-	-	-	-	250,462
Total Best estimate - gross	R0260	_	_	-	-	302,473
Total Best estimate - net	R0270	_	-	-	-	243,830
Risk margin	R0280	_	-	-	-	19,053
Amount of the transitional on Technical Provisions	-					
Technical Provisions calculated as a whole	R0290	-	-	-	-	
Best estimate	R0300	-	-	-	-	-
Risk margin	R0310	-	-	-	-	-
Technical provisions - total						
Technical provisions - total	R0320	-	-	-	-	321,526
Recoverable from reinsurance contract/SPV	_					
and Finite Re after the adjustment for	R0330					58,64
expected losses due to counterparty default -	NUSSU	-	_	_		30,044
total						
Technical provisions minus recoverables	R0340					262,883
from reinsurance/SPV and Finite Re - total	110340		_	· -		202,003

#### S.19.01.21 - Non-life insurance claims

1		ici wi iciii 8 year.										
CO010         C0020         C0040           R0100         27,845         48,921         18,889         7,554           R0170         29,911         52,288         18,889         7,554           R0170         29,911         52,288         18,889         7,554           R0180         72,263         50,145         37,947         3,095           R0190         41,439         55,307         21,103         20,190           R0200         111,775         47,779         34,477         22,065           R0210         30,088         72,809         19,859         8,669           R0220         46,514         58,979         20,257           R0240         39,859         58,475         20,257           R0250         42,177         47,175         34,477           R0250         42,177         47,353         30,274         17,559           R0160         103,982         47,353         30,274         17,559           R0160         103,982         47,353         30,274         17,559           R0170         88,654         38,420         14,318         7,285           R0170         88,654         33,916         32,066<			ָּט <u></u>	ross Claims	Paid (non-cu	ımulatıve)						
C0010				Deve	<b>Development year</b>	ar					Current year Sum of years	um of years
R0100   C0020   C0030   C0040   C004		2	3	4	5	9	7	∞	6	10 & +		
R0100         Z7,845         48,921         18,889         7,554           R0160         Z7,845         48,921         18,889         7,554           R0170         Z9,911         52,288         18,801         5,193           R0170         Z2,263         50,145         37,947         3,095           R0200         111,775         47,779         34,477         22,065           R0210         30,088         72,809         19,859         8,669           R0220         50,583         73,963         21,611         12,814           R0240         39,859         58,475         20,257           R0250         42,177         42,177           R0260         1         2         3           R0100         103,982         47,353         30,274         17,559           R0110         88,654         38,420         14,318         7,285           R0180         88,768         39,916         32,745         35,381           R0200         105,775         59,719         32,745         35,381           R0210         108,109         38,400         20,153         10,522			C0040	C0050	09000	C0070	C0080	06000	C0100	C0110	C0170	C0180
R0160         27,845         48,921         18,889         7,554           R0170         29,911         52,288         18,801         5,193           R0180         72,263         50,145         37,947         3,095           R0180         72,263         50,145         37,947         20,190           R0210         30,088         72,809         19,859         8,669           R0220         50,583         73,963         21,611         12,814           R0230         46,514         58,979         20,257           R0240         39,859         58,475         36,084           R0250         42,177         47,353         30,274         17,559           R0100         103,982         47,353         30,274         17,559           R0110         88,654         38,420         14,318         7,285           R0180         88,768         39,916         32,745         35,381           R0200         105,775         59,719         32,745         35,381           R0210         108,109         38,400         20,153         10,522										(3,683)	(3,683)	656,448
R0170         29,911         52,288         18,801         5,193           R0180         72,263         50,145         37,947         5,193           R0190         41,439         55,307         21,103         20,190           R0210         41,439         55,307         21,103         20,190           R0210         30,088         72,809         19,859         8,669           R0220         50,583         73,963         21,611         12,814           R0230         46,514         58,979         20,257           R0240         39,859         58,475         3,679           R0250         42,177         47,373         46,514           R0250         42,177         47,353         30,274         17,559           R0100         R0100         7,38,420         10,318         7,285           R0110         88,654         38,420         11,707         5,519           R0190         88,768         39,916         32,745         35,381           R0210         105,775         59,719         32,745         35,381           R0210         108,109         38,400         20,153         10,520	27,845		7,554	5,229	4,337	2,337	2,087	108	978		978	118,286
R0180   72,263   50,145   37,947   3,095     R0190   41,439   55,307   21,103   20,190     R0200   111,775   47,779   34,477   22,065     R0210   30,088   72,809   19,859   8,669     R0220   50,583   73,963   21,611   12,814     R0240   39,859   58,475   20,257     R0260   42,177   2	29,911		5,193	3,823	949	104	(46)	733			733	111,752
R0190	72,263		3,095	2,116	379	689	39				39	166,673
R0200	41,439		20,190	3,374	1,129	579					579	143,122
R0210   30,088   72,809   19,859   8,669   8,669   8,669   8,669   8,669   8,669   8,669   8,669   8,669   8,669   8,669   8,669   8,669   8,669   8,669   8,669   8,669   8,669   8,6979   8,	111,775		22,065	16,121	11,432						11,432	243,649
R0220   50,583   73,963   21,611   12,814     R0230   46,514   58,979   20,257     R0240   39,859   58,475     R0250   42,177	30,088		8,669	2,741							2,741	134,166
R0230         46,514         58,979         20,257           R0240         39,859         58,475         Agran           R0250         42,177         Agran         Agran           R0260         1         2         3           R0100         103,982         47,353         30,274         17,559           R0170         88,654         38,420         14,318         7,285           R0180         101,256         53,084         11,707         5,519           R0190         88,768         39,916         32,745         35,381           R0210         106,775         59,719         32,745         35,381           R0210         108,109         38,400         20,153         10,522	50,583		12,814								12,814	158,970
R0240   39,859   58,475	46,514										20,257	125,750
R0250   42,177	39,859	475									58,475	98,334
R0260											42,177	42,177
CO200											146,542	1,999,327
CO200			Gros	s undiscour	ss undiscounted Best Estimate Claims Provisions	timate Clain	ns Provision	s				
r         0         1         2         3           CO200         CO210         CO220         CO230         CO           F         CO200         CO210         CO220         CO230         CO           R         R         CO200         CO210         CO220         CO230         CO           R         R         CO200         CO220         CO230         CO         CO230         CO           R         R         CO200         CO210         CO220         CO230         CO         CO220         CO230         CO           R         R         CO110         R         R         A7,285         A7,270         A7,270         A7,270				Deve	Development year	ar					Year end	
r         R0100         C0200         C0210         C0220         C0230         C0           R0160         103,982         47,353         30,274         17,559           R0170         88,654         38,420         14,318         7,285           R0180         101,256         53,084         11,707         5,519           R0190         88,768         39,916         32,066         8,333           R0200         105,775         59,719         32,745         35,381           R0210         108,109         38,400         20,153         10,522           R0210         123,007         53,74         12,700		2	m	4	5	9	7	∞	6	10 & +		
F         R0100         R0160         103,982         47,353         30,274         17,559           R0170         88,654         38,420         14,318         7,285           R0180         101,256         53,084         11,707         5,519           R0190         88,768         39,916         32,066         8,333           R0200         105,775         59,719         32,745         35,381           R0210         108,109         38,400         20,153         10,522           R0210         123,007         53,745         35,745         35,760			C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0360	
R0160         103,982         47,353         30,274         17,559           R0170         88,654         38,420         14,318         7,285           R0180         101,256         53,084         11,707         5,519           R0190         88,768         39,916         32,066         8,333           R0200         105,775         59,719         32,745         35,381           R0210         108,109         38,400         20,153         10,522										5,859	5,584	
R0170         88,654         38,420         14,318         7,285           R0180         101,256         53,084         11,707         5,519           R0190         88,768         39,916         32,066         8,333           R0200         105,775         59,719         32,745         35,381           R0210         108,109         38,400         20,153         10,522           R0210         123,007         123,007         123,000	103,982		17,559	7,857	5,364	4,175	361	1,371	1,705		1,625	
R0180         101,256         53,084         11,707         5,519           R0190         88,768         39,916         32,066         8,333           R0200         105,775         59,719         32,745         35,381           R0210         108,109         38,400         20,153         10,522           R0210         123,007         123,007         123,000	88,654		7,285	3,756	1,822	1,573	1,661	1,140			1,086	
R0190         88,768         39,916         32,066         8,333           R0200         105,775         59,719         32,745         35,381           R0210         108,109         38,400         20,153         10,522	101,256		5,519	2,479	2,138	1,273	1,031				985	
R0200         105,775         59,719         32,745         35,381           R0210         108,109         38,400         20,153         10,522	88,768		8,333	2,776	2,054	1,181					1,126	
R0210 108,109 38,400 20,153 10,522 not of the condition o	105,775		35,381	34,854	21,245						20,250	
00076 17663 700761 00000	108,109		10,522	6,768							6,451	
KUZZU 134,8U/ 32,2/1 27,028	134,807	271 27,028	12,708								12,113	
N-2 R0230 106,362 45,341 23,147	106,362										22,063	
N-1 R0240 119,470 69,397	119,470	397									66,145	
N R0250 188,578											179,742	
Total R0260											317,167	

# S.22.01.21 - Impact of long term guarantees and transitional measures

		Amount with Long Term Guarantee measures and transitionals	Impact of transitional on technical provisions	Impact of transitional on interest rate	Impact of volatility adjustment set to zero	Impact of matching adjustment set to zero
		C0010	C0030	C0050	C0070	C0090
Technical provisions	R0010	321,526	-	-	-	-
Basic own funds	R0020	401,471	(401,471)	-	(401,471)	-
Eligible own funds to meet Solvency Capital Requirement	R0050	499,243	(499,243)	-	(499,243)	-
Solvency Capital Requirement	R0090	195,543	(195,543)	-	(195,543)	-
Eligible own funds to meet Minimum Capital Requirement	R0100	401,471	(401,471)	-	(401,471)	-
Minimum Capital Requirement	R0110	60,672	(60,672)	-	(60,672)	-

### S.23.01.01 - Own funds

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35	_	C0010	C0020	C0030	C0040	C0050
Ordinary share capital (gross of own shares)	R0010	-	-		-	
Share premium account related to ordinary share capital	R0030	-	-		-	
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040	8,042	8,042		-	
Subordinated mutual member accounts	R0050	-		-	-	
Surplus funds	R0070	-	-			
Preference shares	R0090	-		-	-	
Share premium account related to preference shares	R0110	-		-	-	
Reconciliation reserve	R0130	393,429	393,429			
Subordinated liabilities  An amount equal to the value of net deferred tax assets	R0140 R0160	-		-	-	
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180	-	-	-	-	
reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds  Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own	R0220	-				
funds						
Deductions  Deductions for participations in financial and	R0230	-	-	-	-	
credit institutions  Total basic own funds after deductions	R0290	401,471	401,471	-	-	
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300	-			-	
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310	-			-	
Unpaid and uncalled preference shares callable on demand	R0320	-			-	
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330	-			-	
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340	-			-	
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350	-			-	

### S.23.01.01 - Own funds

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
	-	C0010	C0020	C0030	C0040	C0050
Supplementary members calls under first	Г					
subparagraph of Article 96(3) of the Directive	R0360	_			_	
2009/138/EC						
Supplementary members calls - other than	·					
under first subparagraph of Article 96(3) of	R0370	122,824			122,824	-
the Directive 2009/138/EC						
Other ancillary own funds	R0390	-			-	-
Total ancillary own funds	R0400	122,824			122,824	-
Available and eligible own funds	· [					
Total available own funds to meet the SCR	R0500	524,295	401,471	-	122,824	-
Total available own funds to meet the MCR	R0510	401,471	401,471	-	-	
Total eligible own funds to meet the SCR	R0540	499,243	401,471	-	97,772	-
Total eligible own funds to meet the MCR	R0550	401,471	401,471	-	-	
SCR	R0580	195,543				
MCR	R0600	60,672				
Ratio of Eligible own funds to SCR	R0620	255%				
Ratio of Eligible own funds to MCR	R0640	662%				

		C0060
Reconciliation reserve		
Excess of assets over liabilities	R0700	401,471
Own shares (held directly and indirectly)	R0710	
Foreseeable dividends, distributions and	R0720	
charges	KU/20	
Other basic own fund items	R0730	8,042
Adjustment for restricted own fund items in		
respect of matching adjustment portfolios	R0740	-
and ring fenced funds		
Reconciliation reserve	R0760	393,429
Expected profits		
Expected profits included in future premiums	R0770	
(EPIFP) - Life business	1(0770	
Expected profits included in future premiums	R0780	31,718
(EPIFP) - Non-life business	110700	31,710
Total Expected profits included in future	R0790	31,718
premiums (EPIFP)	110790	] 31,710

# S.25.01.21 - Solvency Capital Requirement - for undertakings on Standard Formula

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0120
Market risk	R0010	49,162		
Counterparty default risk	R0020	28,870		
Life underwriting risk	R0030	-	None	
Health underwriting risk	R0040	10,542	None	*17
Non-life underwriting risk	R0050	148,598	None	*20
Diversification	R0060	(51,412)		
Intangible asset risk	R0070	-		
Basic Solvency Capital Requirement	R0100	185,759		

Calculation of Solvency Capital Requirement		C0100
Operational risk	R0130	9,784
Loss-absorbing capacity of technical provisions	R0140	
Loss-absorbing capacity of deferred taxes	R0150	
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	
Solvency Capital Requirement excluding capital add-on	R0200	195,543
Capital add-on already set	R0210	
Solvency capital requirement	R0220	195,543
	_	
Other information on SCR		C0110
	R0400	C0110
Other information on SCR  Capital requirement for duration-based equity risk sub-module  Total amount of Notional Solvency Capital Requirements for remaining part	R0400 R0410	C0110
Capital requirement for duration-based equity risk sub-module  Total amount of Notional Solvency Capital Requirements for remaining		C0110
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	R0410	C0110

# S.25.01.21 - Solvency Capital Requirement - for undertakings on Standard Formula

Simplifications used	<u>USP</u>
1* Simplifications spread risk – bonds and loans 2* Simplifications market concentration risk – simplifications used 3* Captives simplifications - interest rate risk 4* Captives simplifications - spread risk on bonds and loans 5* Captives simplifications - market concentration risk 6* Simplifications - mortality risk 7* Simplifications - longevity risk 8* Simplifications - disability-morbidity risk 9* Simplifications - life expense risk 10* Simplifications - life catastrophe risk 12* Simplifications - health mortality risk 13* Simplifications - health disability-morbidity risk-medical expenses 15* Simplifications - health disability-morbidity risk-income protection 16* Simplifications - SLT lapse risk 17* Simplifications - NSLT lapse risk 18* Simplifications - NSLT lapse risk 18* Simplifications - health despense risk 19* Captives simplifications - premium and reserve risk 20* Simplifications used – non-life lapse risk	1* Increase in the amount of annuity benefits 2 * Standard deviation for NSLT health premium risk referred to in Title I Chapter V Section 12 of Delegated Regulation (EU) 2015/35 3 * Standard deviation for NSLT health gross premium risk referred to in Title I Chapter V Section 12 of Delegated Regulation (EU) 2015/35 4 * Adjustment factor for non-proportional reinsurance 5 * Standard deviation for NSLT health reserve risk referred to in Title I Chapter V Section 12 of Delegated Regulation (EU) 2015/35 6 * Standard deviation for non-life premium risk 7 * Standard deviation for non-life gross premium risk 8 * Adjustment factor for non-proportional reinsurance 9 * Standard deviation for non-life reserve risk

Approach based on average tax rate	R0590	Yes/No  C0109  Approach based on average tax rate is not applicable as LAC DT is not used
LAC DT	R0640	
LAC DT justified by reversion of deferred tax liabilities	R0650	-
LAC DT justified by reference to probable future taxable economic profit	R0660	
LAC DT justified by carry back, current year	R0670	
LAC DT justified by carry back, future years	R0680	
Maximum LAC DT	R0690	

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

Linear formula component for non-life insurance and reinsurance obligations	-	MCR components	
MCRnI-Result	_ R0010	C0010 60,672	
		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	7,381	19,659
Income protection insurance and proportional reinsurance	R0030	-	-
Workers' compensation insurance and proportional reinsurance	R0040	-	-
Motor vehicle liability insurance and proportional reinsurance	R0050	-	-
Other motor insurance and proportional reinsurance	R0060	-	-
Marine, aviation and transport insurance and proportional reinsurance	R0070	236,448	250,332
Fire and other damage to property insurance and proportional reinsurance	- R0080	-	-
General liability insurance and proportional reinsurance	R0090	-	-
Credit and suretyship insurance and proportional reinsurance	R0100	-	-
Legal expenses insurance and proportional reinsurance	R0110	-	-
Assistance and proportional reinsurance	R0120	-	-
Miscellaneous financial loss insurance and proportional	- D0120		
reinsurance	R0130	_	-
Non-proportional health reinsurance	R0140	-	-
Non-proportional casualty reinsurance	R0150	-	-
Non-proportional marine, aviation and transport reinsurance	R0160	-	-
Non-proportional property reinsurance	R0170	-	-

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

Linear formula component for non-life insurance and reinsurance obligations		MCR components	
		C0040	-
MCRI-Result	R0200	-	]
		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
		C0050	C0060
Obligations with profit participation - guaranteed benefits	R0210	-	
Obligations with profit participation - future discretionary benefits	R0220	-	
Index-linked and unit-linked insurance obligations	R0230	_	
Other life (re)insurance and health (re)insurance obligations	R0240	-	
Total capital at risk for all life (re)insurance obligations	R0250		-
Linear MCR	R0300	C0070 60,672	ח
SCR SCR	R0300	195,543	_
MCR cap	R0310	87,995	
MCR floor	R0330	48,886	_
Combined MCR	R0340	60,672	_
Absolute floor of the MCR	R0350	3,966	_
Minimum Capital Requirement	R0400	60,672	-

### S.28.02.01 - Minimum Capital Requirement - Both life and non-life insurance activity

MCR components						
Non-life	Life activities					
activities	Life activities					
MCR(NL, NL)	MCR(NL,					
Result	L)Result					
C0010	C0020					
60,672						

Linear formula component for non-life insurance and reinsurance obligations

R0010 60,672 -

Net (of re- insurance/SPV) best estimate and TP calculated as a whole T			Non-life a	activities	Life activities		
Medical expense insurance and proportional reinsurance Income protection insurance and proportional reinsurance Workers' compensation insurance and proportional reinsurance Workers' compensation insurance and proportional reinsurance Motor vehicle liability insurance and proportional reinsurance Other motor insurance and proportional reinsurance Marine, aviation and transport insurance and proportional reinsurance Fire and other damage to property insurance and proportional reinsurance General liability insurance and proportional reinsurance Credit and suretyship insurance and proportional reinsurance Legal expenses insurance and proportional reinsurance Rossistance and proportional r			insurance/SPV) best estimate and TP calculated as a whole	reinsurance) written premiums in the last 12 months	insurance/SPV) best estimate and TP calculated as a whole	reinsurance) written premiums in the last 12 months	
reinsurance  Workers' compensation insurance and proportional reinsurance  Motor vehicle liability insurance and proportional reinsurance  Other motor insurance and proportional reinsurance  Marine, aviation and transport insurance and proportional reinsurance  Fire and other damage to property insurance and proportional reinsurance  General liability insurance and proportional reinsurance  Credit and suretyship insurance and proportional reinsurance  Legal expenses insurance and proportional reinsurance  Miscellaneous financial loss insurance and proportional reinsurance  Non-proportional reinsurance  Non-proportional lealth reinsurance  Non-proportional marine, aviation and transport reinsurance  R0150		R0020				<u>-</u>	
reinsurance  Motor vehicle liability insurance and proportional reinsurance  Other motor insurance and proportional reinsurance  Marine, aviation and transport insurance and proportional reinsurance  Fire and other damage to property insurance and proportional reinsurance  General liability insurance and proportional reinsurance  Credit and suretyship insurance and proportional reinsurance  Legal expenses insurance and proportional reinsurance  Assistance and proportional reinsurance  Non-proportional reinsurance  Non-proportional casualty reinsurance  Non-proportional acasualty reinsurance  Non-proportional marine, aviation and transport reinsurance  Rouso		R0030	-	-	-	-	
Teinsurance  Other motor insurance and proportional reinsurance  Marine, aviation and transport insurance and proportional reinsurance  Fire and other damage to property insurance and proportional reinsurance  General liability insurance and proportional reinsurance  Credit and suretyship insurance and proportional reinsurance  Legal expenses insurance and proportional reinsurance  Assistance and proportional reinsurance  Miscellaneous financial loss insurance and proportional reinsurance  Non-proportional health reinsurance  Non-proportional casualty reinsurance  Non-proportional marine, aviation and transport reinsurance  R0060		R0040	-	-	-	-	
Marine, aviation and transport insurance and proportional reinsurance  Fire and other damage to property insurance and proportional reinsurance  General liability insurance and proportional reinsurance  Credit and suretyship insurance and proportional reinsurance  Legal expenses insurance and proportional reinsurance  Assistance and proportional reinsurance  Miscellaneous financial loss insurance and proportional reinsurance  Non-proportional reinsurance  Non-proportional casualty reinsurance  Non-proportional marine, aviation and transport reinsurance  R0160  R0070  236,448  250,332  -  -  -  -  -  -  -  -  -  -  -  -  -		R0050	-	-	-	-	
proportional reinsurance  Fire and other damage to property insurance and proportional reinsurance  General liability insurance and proportional reinsurance  Credit and suretyship insurance and proportional reinsurance  Legal expenses insurance and proportional reinsurance  Assistance and proportional reinsurance  Miscellaneous financial loss insurance and proportional reinsurance  Non-proportional reinsurance  Non-proportional casualty reinsurance  Non-proportional marine, aviation and transport reinsurance  R0160  - 236,448  250,332	Other motor insurance and proportional reinsurance	R0060	-	-	-	-	
proportional reinsurance  General liability insurance and proportional reinsurance  Credit and suretyship insurance and proportional reinsurance  Legal expenses insurance and proportional reinsurance  Assistance and proportional reinsurance  Miscellaneous financial loss insurance and proportional reinsurance  Non-proportional reinsurance  Non-proportional health reinsurance  Non-proportional casualty reinsurance  Non-proportional marine, aviation and transport reinsurance  R0160  R0090	·	R0070	236,448	250,332	-	-	
reinsurance  Credit and suretyship insurance and proportional reinsurance  Legal expenses insurance and proportional reinsurance  Assistance and proportional reinsurance  Miscellaneous financial loss insurance and proportional reinsurance  Non-proportional reinsurance  Non-proportional health reinsurance  Non-proportional casualty reinsurance  Non-proportional marine, aviation and transport reinsurance  R0160  R010	proportional reinsurance	R0080	-	-	-	-	
reinsurance  Legal expenses insurance and proportional reinsurance  Assistance and proportional reinsurance  R0120  Miscellaneous financial loss insurance and proportional reinsurance  Non-proportional reinsurance  Non-proportional health reinsurance  Non-proportional casualty reinsurance  Non-proportional marine, aviation and transport reinsurance  R0160  R0110	reinsurance	R0090	-	-	-	-	
reinsurance  Assistance and proportional reinsurance  Miscellaneous financial loss insurance and proportional reinsurance  Non-proportional health reinsurance  Non-proportional casualty reinsurance  Non-proportional marine, aviation and transport reinsurance  R0140  R0140		R0100	-	-	-	-	
Miscellaneous financial loss insurance and proportional reinsurance  Non-proportional health reinsurance  Non-proportional casualty reinsurance  Non-proportional marine, aviation and transport reinsurance  R0140		R0110	-	-	-	-	
proportional reinsurance  Non-proportional health reinsurance  Non-proportional casualty reinsurance  Non-proportional marine, aviation and transport reinsurance  R0140		R0120	-	-	-	-	
Non-proportional casualty reinsurance R0150	proportional reinsurance	R0130	-		-		
Non-proportional marine, aviation and transport reinsurance		R0140					
reinsurance R0160		R0150	-	-	-	-	
Non-proportional property reinsurance R0170	reinsurance	R0160	-	_	-	-	
	Non-proportional property reinsurance	R0170	-	-	-	-	

### S.28.02.01 - Minimum Capital Requirement - Both life and non-life insurance activity

		Non-life activities	Life activities
		MCR(L, NL)	MCR(L, L)
		Result	Result
		C0070	C0080
Linear formula component for life insurance and reinsurance obligations	R0200	-	_

Combined MCR

Absolute floor of the MCR

Minimum Capital Requirement

		Non-life activities		Life activities	
		Net (of re- insurance/SPV) best estimate and TP calculated as a whole	insurance/SPV) total capital at risk	Net (of re- insurance/SPV) best estimate and TP calculated as a whole	Net (of re- insurance/SPV) total capital at risk
Obligations with profit participation - guaranteed benefits	R0210	C0090	C0100	C0110	C0120
Obligations with profit participation - future discretionary benefits	R0220				
Index-linked and unit-linked insurance obligations	R0230				
Other life (re)insurance and health (re)insurance obligations	R0240				
Total capital at risk for all life (re)insurance obligations	R0250				
Overall MCR calculation					
Lineau MCD	D0200	C0130	1		
Linear MCR SCR	R0300 R0310	60,672 195,543			
MCR cap	R0310	87,995			
MCR floor	R0330	48,886			

Notional non-life and life MCR calculation		Non-life activities	Life activities
		C0140	C0150
Notional linear MCR	R0500	60,672	-
Notional SCR excluding add-on (annual or latest	R0510	195.543	_
calculation)	10010	193,343	
Notional MCR cap	R0520	87,995	-
Notional MCR floor	R0530	48,886	-
Notional Combined MCR	R0540	60,672	-
Absolute floor of the notional MCR	R0550	3,966	-
Notional MCR	R0560	60,672	-

60,672

3,966

60,672

R0340

R0350

R0400

