Solvency Financial Condition Report – SFCR 2024

Guardian Group Nederland N.V.

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Summary

GGNL is a Dutch non-life insurer that operates with a ‘lean & efficient’ business model, focusing solely on the distribution channel of authorized agents. The authorized agent market is a resilient growth market that continues to evolve and professionalize.

While GGNL offers various products, the primary focus is on the property and liability commercial lines of business. In 2023, the premium volume for the entire portfolio was over € 66.9 million, which developed to a level of € 67.7 million in 2024.

GGNL closed this year with a positive result of € 2.6 million, after taxes. The solvency ratio level per ultimo 2024 is 190%, which is well above the statutory required capital of 100%, the internal norm of 150% and our internal target ratio of 175%.

Thanks to the positive result for the 2024 fiscal year, GGNL's solid financial position remains unchanged. GGNL's equity on a statutory basis amounts to € 24.4 million. The solvency II available/eligible capital for GGNL is € 20.0 million. GGNL's Solvency II solvency requirement is € 10.5 million. This results in a solvency ratio of 190%. The target solvency under GGNL's capital policy is 175%.

Introduction

This report serves as the qualitative Solvency II report of Guardian Group Nederland N.V. (hereinafter GGNL). This report provides an explanation of the operations and financial and solvency position on Solvency II principles as of 31-12-2024 of GGNL. This report will be delivered to DNB as Financial Condition Report (SFCR) as required under Solvency II. The structure of this Solvency and Financial Condition Report (SFCR) has been drafted using the guidelines laid down for this purpose in the Solvency II regulations.

In developing this report, the regulations and guidelines on this subject as published by DNB were taken into account. The main sources in this regard are as follows:

- Directive of the European Parliament and the Council (November 25, 2009/138/EC).
- Delegated Acts (EU) 2015/35 of the European Commission (October 10, 2014).

The figures in this report have also been submitted as Quantitative Reporting Templates (QRTs), in which a great deal of detail has been provided on the figures underlying this report.

Our history

Guardian Group Nederland N.V. (hereafter: GGNL) was established on July 26, 2021 as a subsidiary of Fatum General Insurance N.V. Fatum General Insurance N.V. is a Curaçao based insurer that is supervised by the Central Bank of Curaçao and Sint Maarten (CBCS). Fatum General Insurance N.V. is a wholly owned subsidiary of Fatum Holding N.V. This holding company and its insurance subsidiaries form part of Guardian Holdings Limited in Trinidad and Tobago.

Fatum General Insurance N.V. has been active as an insurer in the Netherlands since October 2008 on the basis of a cross-border services license pursuant to Section 2:45 of the Financial Supervision Act (Wft). Since November 2018, Fatum General Insurance N.V. (hereinafter: FGI) has also been active in the Netherlands under the trade name Guardian Group Nederland.

In order to continue to serve FGI policyholders in the Netherlands, FGI established a new entity on July 26, 2021: Guardian Group Nederland N.V. With this new entity, the process for applying for a license to operate as a non-life insurer was formally initiated on September 17, 2022 at De Nederlandsche Bank (DNB) (as referred to in Article 2:27, first paragraph, Financial Act). The license was granted 26 October 2022.

Our profile

GGNL is a Dutch non-life insurer that operates with a ‘lean & efficient’ business model, focusing solely on the distribution channel of authorized agents. The authorized agent market is a resilient growth market that continues to evolve and professionalize. Outsourcing of certain primary processes forms a crucial pillar in the chosen strategy. The GGNL outsourcing model seamlessly aligns with the business model of authorized agents. Here the strengths of GGNL and the selected authorized agents complement each other without overlapping tasks.

Through the establishment of this entity, GGNL has confirmed our commitment to the Dutch market. GGNL enhances collaboration and knowledge sharing by maintaining streamlined communication and prioritizing personal engagement with authorized agents. This reinforced interaction results in the outsourcing of operations being managed at a higher level of quality and/or executed more (cost) efficiently. Financial and actuarial expertise, as well as capital, are provided by GGNL. A customer-centric and efficient back office is set up by the authorized agent. Product development and niche marketing are jointly undertaken by both parties, enabling the creation of distinctive products focused on convenience for the (commercial) end customer.

The GGNL market approach will contribute to our growth objective, which is accompanied by the precondition of improving profitability and enabling us to represent the interests of our stakeholders. The product offering of GGNL targets both the private and commercial segments with non-life products.

The premium volume has since increased to € 67.7 million (2023: € 66.9 million) exclusively through the distribution channel of the authorized agents (AA). More than 33 selected AA's (2023: 30) have now been appointed and in 2024 a gross combined ratio of 80% (2023: 70%) was achieved.

A. Business and performance

A.1 Business and performance

GGNL is a Dutch non-life insurer that operates with a 'lean & efficient' business model, focusing solely on the distribution channel of authorized agents. The authorized agent market is a resilient growth market that continues to evolve and professionalize.

Outsourcing of certain primary processes forms a crucial pillar in the chosen strategy. The outsourcing model seamlessly aligns with the business model of authorized agents. Here the strengths of GGNL and the selected delegated agents complement each other without overlapping tasks. Through the establishment of this entity we confirm our commitment to the Dutch market. The organization with its streamlined communication and focused attention on authorized agents, fosters a close partnership and pooling of (market) knowledge. This reinforced interaction results in the outsourcing of operations being managed at a higher level of quality and/or executed more (cost) efficiently. Financial and actuarial expertise, as well as capital, are provided by GGNL.

A customer-centric and efficient back office is set up by the authorized agent. Product development and niche marketing are jointly undertaken by both parties, enabling the creation of distinctive products focused on convenience for the (commercial) end customer. This market approach will contribute to our growth objective, which is accompanied by the precondition of improving profitability and enabling us to represent the interests of our stakeholders. The product offering of GGNL targets both the private and commercial segments with non-life products obtained with a Solvency II license in 2022 from DNB.

While GGNL offers various products, the primary focus is on the property and liability commercial lines of business. In 2023, the premium volume for the entire portfolio was over € 66.9 million, which developed to a level of € 67.7 million in 2024. The year 2024 marks the second full year in which GGNL reports under the license obtained from DNB.

Personnel

The Dutch collective labour agreement for insurance companies (CAO Verzekeringsbedrijf) is applicable to GGNL. As per December 31, 2024, GGNL workforce totals 10 employees (2023: 8 employees), including the Executive Board, equating to 7.82 FTE (2023: 6.66 FTE) positions. GGNL offers permanent employee contracts and has a defined contribution pension scheme in place.

Remuneration policy, principle

GGNL adheres to a carefully crafted, controlled, and sustainable remuneration policy aligned with its strategic goals, risk appetite, values, and long-term objectives. This policy integrates considerations of the regulatory landscape. The primary aim is to ensure fair compensation practices while preventing any form of remuneration that may incentivize inappropriate behaviour among employees or decision-makers. The policy is designed to attract, motivate, and retain qualified talent for all levels, including employees, Executive Board members, and Supervisory Board members, by offering a market-competitive compensation package. For 2024, a variable remuneration component for Executive Board members remains capped at a maximum of 20% and employees may qualify for a bonus equivalent to one month's salary, all in compliance with the "Wet Financieel Toezicht" (Financial Supervision Act).

This approach supports GGNL's objectives of maintaining operational excellence, employee satisfaction, and alignment with industry standards and regulatory requirements.

A.2 Results from insurance activities

Financials

GGNL achieved a portfolio gross written premium of € 67.7 million, marking a 1% increase compared to prior year (2023: € 66.9 million). The Executive Board has taken steps in 2024, to (re)structure the portfolio, aiming to create a solid foundation for future growth by carefully reviewing all partnerships, agreements and contract extensions. Consequently, the portfolio size has remained stable, positioning us to accelerate growth over the next three years. Claim costs rose (+28%) mainly in the second half of the year and remained within expectations.

GGNL benefited from higher investment income (+140%), mainly driven by the yield on investments acquired in 2023 with a longer duration. Operational costs also increased (+19%), mainly due to higher personnel cost and expenditure related to improving GGNL's operations, but remained within budget reflecting disciplined cost management.

The gross combined ratio increased to 80%, remaining well below targeted levels. Net operating profit for the year reached € 2.6 million, a 18% decline (2023: € 3.2 million) compared to 2023, largely due to increased claim costs, higher operational expenses and a higher amount was recognized in 2023 on profit commissions as these were related to the establishment of the GGNL stand-alone entity. These profit commissions were linked to the transferred FGI-portfolio and were settled during the portfolio transfer in the fiscal year 2023.

The result on technical accounts can be specified as follows:

(in euros)	Fire and other damage to property insurance		General liability and other insurance		Total	
	2024	2023	2024	2023	2024	2023
Earned premiums for own account						
Gross written premiums	46.045.190	45.005.172	21.687.266	21.897.548	67.732.456	66.902.720
Reinsurance premiums	36.541.411	35.359.272	16.681.818	17.273.677	53.223.229	52.632.949
	9.503.779	9.645.900	5.005.448	4.623.871	14.509.227	14.269.771
Change in technical provision for unearned premium						
Gross	507.794	(484.710)	250.129	280.009	757.923	(204.701)
Reinsurance	601.359	(1.225.341)	339.428	85.604	940.787	(1.139.737)
	(93.565)	740.631	(89.299)	194.405	(182.864)	935.036
	9.410.214	**10.386.531**	**4.916.149**	**4.818.276**	**14.326.363**	**15.204.807**
Allocated investment income	166.220	61.418	78.328	30.536	244.548	91.954
Claims for own account						
Gross claims paid	18.656.134	16.118.937	10.840.928	9.293.626	29.497.062	25.412.563
Reinsurance claims	14.951.921	14.029.383	9.106.174	8.343.528	24.058.095	22.372.911
	3.704.213	2.089.554	1.734.754	950.098	5.438.967	3.039.652
Change in technical provision for claims						
Gross	3.082.990	976.585	2.073.123	1.557.566	5.156.113	2.534.151
Reinsurance	1.799.565	239.429	1.144.539	895.276	2.944.104	1.134.705
	1.283.425	737.156	928.584	662.290	2.212.009	1.399.446
	4.987.638	**2.826.710**	**2.663.338**	**1.612.388**	**7.650.976**	**4.439.098**
Operational expenses	2.724.172	4.911.591	1.375.807	2.005.791	4.099.979	6.917.382
Result on technical account	**1.864.624**	**2.709.648**	**955.332**	**1.230.633**	**2.819.956**	**3.940.281**

Investments and expenses

In 2024, GGNL focused on IT investments to enhance automation, data quality, and regulatory compliance. Key efforts included automating finance and compliance processes, developing financial dashboards, improving data quality, preparing for future ESG reporting and ICT-related requirements, such as DORA compliance. These initiatives led to an increase in spend (+23%) compared to 2023, but GGNL remained within cost budget, reflecting effective cost management while strengthening GGNL's operational and regulatory readiness.

Investments and expenses

At 31 December 2024, GGNL's solid financial position remains unchanged and the equity on a statutory basis amounts to € 21.7 million. GGNL's solvency II capital requirement is € 10.3 million and as a result the solvency ratio stands at 190% (2023: 201%). During 2024, several initiatives were conducted to update GGNL's governance and policy documents. The internal target capital ratio is 175% (2023: 200%) and has been updated in the GGNL Capital policy and was approved by the SB in 2024. The setting of the internal target capital was to allocate the excess of capital to better align the target with GGNL's growth ambitions and to optimize the GGNL reinsurance structure in 2025. The internal norm remains at 150%.

Expectations for the year 2025

GGNL prioritized profitability in underwriting new business and the selection of (new) authorized agents. While this approach resulted in portfolio growth that was below financial budget, it contributed to a significantly better gross combined ratio than market average and NOPAT above budget. GGNL also maintained a lower operational cost ratio compared to the industry benchmark and successfully operated within the 2024 cost budget. However, during the final quarters of the year, GGNL experienced a higher amount of incurred claims, for which the large incurred claims were carefully assessed on a case-by-case basis to ensure prudent management. The Executive Board delivered a financial budget plan 2025 – 2029, with clear targets set for 2025.

Looking ahead, GGNL remains confident in the opportunities within the Dutch and European market to drive sustainable and profitable growth in 2025.

In Q1 2025, we experienced relative higher incurred losses than expected concerning our property portfolio. Currently, an estimation of the impact on our year-end incurred claims, is too early to project.

Furthermore over 2025, we expect to add new authorized agents and increase our portfolio, while maintaining our targeted combined ratios. GGNL also aims to maintain strong capital levels and takes into account to increase reinsurance retention levels. In order to facilitate this, we will continue to invest in improving data quality and our financial & actuarial reporting.

We extend our gratitude to Mr. P.W. Baardse for his service as interim-CFRO and to all our stakeholders for their trust and excellent collaboration. We look forward to strengthening our relationships further in 2025.

A.3 Results from investment activities

At the end of 2024, the balance for other financial investments and cash amounted to € 31.4 million (2023: € 28.7 million). A total of € 24.2 million (2023: € 15.1 million) is invested in bonds, consisting of € 14.9 million in government bonds (2023: € 10.5 million) and € 9.3 million in corporate bonds (2023: € 4.6 million). The remaining € 7.7 million (2023: € 13.6 million) is held in deposits and cash. All investments are maintained with parties rated at least BBB. Investment income for the year amounted to € 0.9 million (2023: € 0.4 million). The total percentage of "sustainable" linked bonds is 21.6% of the total portfolio.

A.4 Other information

Subsequent events after the balance sheet date

There have been no subsequent events after the balance sheet date that would require adjustment to or disclosure in the financial statements. The Executive Board has reviewed all events occurring after the reporting date up to the date of approval of the financial statements and confirms that there are no material matters or significant developments that impact the financial position or performance as presented.

B. Governance structure

B.1 General information about the Governance system

Regarding the Governance system of GGNL, the following framework is established concerning general Governance arrangements, suitability requirements, the risk management system, and the internal control system.

Corporate Governance arrangements

GGNL comprises of an Executive Board and a Supervisory Board. The Executive Board is responsible for strategy and the operational management of the company and reports to the Supervisory Board. The Supervisory Board oversees the policies and the general affairs within GGNL, challenges the Executive Board in respect of strategy and operations, whilst providing guidance. An Audit, Compliance & Risk Committee (ACRC) has been appointed, consisting of several members of the Supervisory Board. The ACRC primarily focuses on internal risk management, audit, compliance and control.

Supervisory Board
Mrs. T.E. Monzon, chair
Mr. W. Wagenaar
Mr. D. Fränkel

Executive Board
Mr. R.A. van den Broek, CEO
Mr. P.W. Baardse, CFRO
(appointed March 30, 2024. Until July 31, 2024)
Mr. P. Plat, CFRO
(July 31, 2024 – December 31, 2024)

Audit, Compliance and Risk Committee
Mr. W. Wagenaar, chair
Mrs. T.E. Monzon
Mr. D. Fränkel

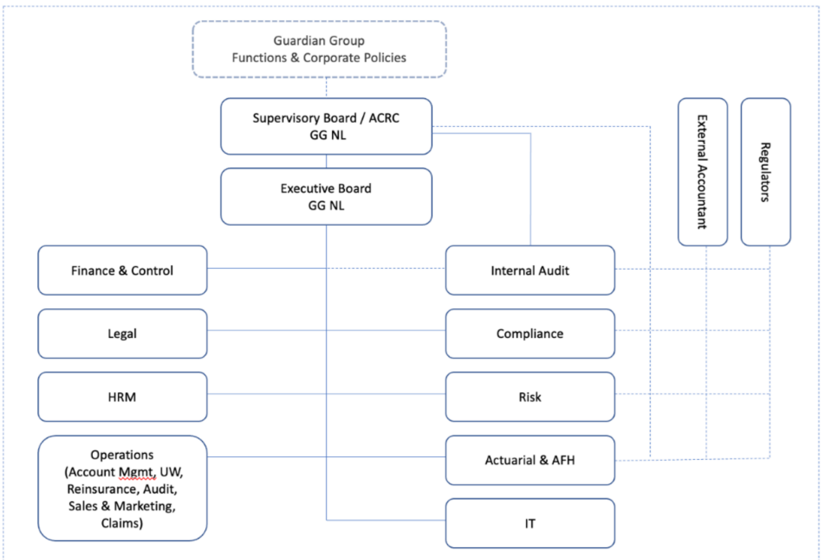
Independent Auditor
PricewaterhouseCoopers Accountants N.V.

Independent Actuary
Triple A Risk Finance Certification B.V.

Internal Audit
ForvisMazars N.V.

The structure below illustrates the organizational structure of GGNL.

Organisational / Governance structure Guardian Group Nederland



The Three Lines model

The tasks, responsibilities, and authorities are described in governance, providing structure within the organisation and managing risks associated with achieving strategic objectives.

To implement governance in the organisation, a standard model, known as the Three Lines model, is utilized. This model contributes to strengthening the risk culture, taking responsibility for managing risks, and internal control within GGNL. It is a control system that enables GGNL to (i) ensure overall risk management, (ii) support the achievement of strategic objectives, and (iii) manage and improve internal processes. Standards for internal control are based on applicable laws and regulations, including the Financial Supervision Act (Wft), which requires GGNL to have a sound and controlled business operation. Internal control focuses on managing operational processes and the adequate implementation of risk mitigation measures.

1. The first line consists of the Executive Board and line management.
2. The second line comprises three of the four key functions: compliance, risk management, and the actuarial function.
3. The third line is represented by the internal audit function, ensuring that the first and second lines operate in accordance with agreements and regulatory requirements.

The GGNL Executive Board monitors whether the execution aligns with agreed objectives, risk appetite, and performance. The second line supports, advises, coordinates, and monitors whether line management fulfils its responsibilities adequately. The third line verifies the interaction between the first and second lines.

Independence and objectivity are important for the effectiveness of these key functions. The key functions for compliance, risk management and actuarial are hierarchically and functionally positioned under the Executive Board. The key function internal audit operates in collaboration with the internal audit group (GIA). The key function internal audit has a functional line with the ACRC of GGNL. From the Executive Board, the CEO is the portfolio holder and therefore the point of contact for the key function internal audit.
The key functions are separated from each other and from other functions within the organisation. The GGNL organisational structure is designed with attention to proportionality of GGNL. The separation of functions is maintained to a certain extent up to the level of the Executive Board. Since GGNL has an Executive Board with two directors, complete separation cannot be achieved at that level. The CEO is portfolio holder of the key function internal audit, whilst the risk management function, compliance function and actuarial function is positioned under the CFRO. The Executive Board collectively bears responsibility for the organisation, including the functioning of the various control functions. The Supervisory Board, among other tasks, ensures the proper functioning of the control functions through its oversight of the company.

Independence of the key functions is ensured through regular meetings and direct, unrestricted access to the Executive Board and the Supervisory Board. Risk based decision-making is also applied in significant decision-making processes.

Taking the relatively small organisation of GGNL into account the internal audit function and the actuarial function in GGNL are outsourced to external parties.

B.2 Risk management function

The Risk Manager fulfils the risk management function. This includes the following tasks and responsibilities:

- Monitoring compliance with risk management procedures
- Preparing meetings of the Risk Committee
- Monitoring data integrity
- Reporting to ACRC

The Risk Management Framework of GGNL includes:

- A risk management strategy aligned with the overall business strategy of GGNL
- Decision-making procedures for risk-taking
- Description and classification of material risks to which GGNL is exposed, and risk tolerance limits per risk category
- Reporting procedures ensuring active monitoring and analysis of information on material risks to which GGNL is exposed and the effectiveness of the risk management system

Reporting is done in such a way that the key stakeholders are provided with the necessary information. These risk reports are part of the risk management process and include reports for regulators, shareholders and internal management. These reports are an important instrument for internal management and form part of GGNL's risk management framework.

The Risk Management Framework of GGNL provides risk assessments and control measures among others for the following areas:

- Assumption of insurance liabilities and reserve formation
- Management of investment risk
- Management of liquidity risk
- Management of counterparty risk
- Management of operational risk
- Management of outsourcing risk
- Management of compliance risk
- Management of IT risk
- Reinsurance and other risk mitigation techniques
- Development of new products and assessment of PARP + POG process

The risk management function also does the annual preparation and execution of the ORSA (Own Risk and Solvency Assessment). This is done under the ultimate responsibility of the CFRO, who will seek assistance from external advisors and experts if necessary.

B.3 Internal audit function

The objective of Internal Audit (IA) is to provide the Audit Committee and the Board with assurance, advice, and insights on the effectiveness and adequacy of GGNL's internal controls (including outsourced activities) and other components of the organization's Governance System in light of the company's business strategies, objectives, and the risks to which the company is exposed.

The scope of IA's activity is focused on assessing the material processes, as developed and implemented by the Board, to determine if they are suitable for their purposes and function in a manner that provides reasonable assurance that:

- Financial, operational, strategic, and regulatory risks are appropriately identified, monitored, and managed, including the assessment of second-line functions

- Outsourced activities are effectively monitored
- Relevant control measures are effective and efficient in terms of their design and operation; Financial, management, and operational information is reliable, accurate, complete, and timely; Resources are adequately protected, acquired at market rates, and efficiently utilized;
- Assets are used appropriately
- Reporting processes are effective and support business objectives; Program plans and objectives are achieved
- Performance management and accountability are effective
- Quality and continuous improvement are promoted in GGNL's operational and monitoring processes

Opportunities for improving internal control, profitability, and the company's reputation can be identified by the internal audit. Findings, observations, and recommendations will be communicated to the appropriate management levels and, if applicable, brought to the attention of the Audit Committee.

Placement of Internal Audit within the GGNL Organization The Head of Internal Audit (HIA) of GGNL is responsible for GGNL's internal audit activities, in collaboration with Group Internal Audit (GIA). The HIA has a functional line to GGNL's Audit Committee. From the Board of Directors, the CEO is the portfolio holder and thus the point of contact for the HIA.

B.4 Actuarial function

GGNL has an actuarial function which includes the following tasks and responsibilities:

- Coordinating the calculation of technical provisions
- Ensuring that the methodologies, underlying models, and assumptions used in the calculation of technical provisions are correct
- Assessing whether sufficient data is used in the calculation of technical provisions
- Assessing whether the data used in the calculation of technical provisions is of sufficient quality
- Advising on solvency based on Solvency II principles in cooperation with the risk
- management function.
- Informing the Executive Board about the reliability and adequacy of the calculation of technical provisions
- Advising on the overall policy for entering into insurance obligations
- Advising on the adequacy of reinsurance arrangements
- Contributing to the risk management of GGNL and specifically to the ORSA
- Premium Setting

This function is outsourced to Triple A - Risk Finance through an outsourcing agreement. This is appropriate and prudent given the limited size of the GGNL organisation combined with the required level of expertise.

B.5 Outsourcing

GGNL outsources various activities to third parties. To ensure that this is done in a controlled and regulated manner in line with (supervisory) regulations, the Outsourcing Policy of Guardian Group Netherlands has been established. This policy formulates the principles that GGNL applies to outsourcing and describes how outsourcing takes shape.

The two main conditions that GGNL applies are that outsourcing must result in the activities being managed at a qualitatively higher level and/or executed more efficiently (in terms of cost) than if GGNL were to perform these activities itself.

The most prominent form of outsourcing by GGNL concerns outsourcing to authorized agents. Based on its market analysis, GGNL asserts that authorized agents represent a growing and sustainable distribution channel. The insurer's expertise and capital are made available by the insurer, while a customer-oriented and efficient back office is established by the authorized agent. Regarding authorized agents, deviations from the policy have been made in certain aspects. These involve the steps described below concerning selection and risk analysis.

Selection and risk analysis

As GGNL outsources certain activities, it is important for the organization to have sufficient insight into the control of its outsourcing risks related to these outsourced activities. GGNL conducts a general risk analysis before entering into a new outsourcing arrangement. This risk analysis focuses, among other things, on identifying possible concentration risks of execution tasks with one executor, potential risks of inadequate control of execution tasks by the outsourcing relationship, and legal risks. Scenarios such as failure to meet agreements, failure to meet a minimum level of internal control of execution tasks, and discontinuity are identified during this analysis. Subsequently, a systematic risk analysis is conducted in which the outsourcing risks per type of outsourcing are identified, the ways in which they are controlled are specified, and which risks are accepted. The risk analysis is elaborated in the Outsourcing Policy of Guardian Group Netherlands through selection criteria, monitoring criteria, and evaluation criteria for each type of outsourcing relationship.

Monitoring and evaluation

In addition to carefully selecting a party to which activities are outsourced, it is also important to adequately monitor the execution of the outsourced activities by the outsourcing party (both external parties and intra-group outsourcing). GGNL has established internal processes for monitoring outsourcing and possesses sufficient procedures, measures, expertise, and information. In order to keep track of outsourced activities, GGNL maintains a register of its outsourcing parties (Outsourcing Register). In cases where outsourcing parties also outsource activities themselves, GGNL will agree with the party to which outsourcing is done to receive regular information on sub-outsourcing (incident reports, service level reports, assurance reports on the quality of services, and the effectiveness of internal control measures).

It is stipulated that sub-outsourcing:

- must meet the same criteria that GGNL applies to outsourcing relationships; and
- is prohibited without written consent from GGNL.

Outsourcing parties are periodically and continuously monitored on how they perform the outsourced activities. Additionally, GGNL conducts periodic supplementary assessments to ensure that the overall service meets the desired objectives, requirements and expectations from GGNL and that outsourcing still aligns with GGNL's strategy and risk appetite. Non- critical outsourcings are evaluated upon contract modification or extension, and at least once every 3 years.

The Outsourcing Policy of Guardian Group Netherlands provides documents used by GGNL in the selection process (the Selection Process Format) and the evaluation process (the Outsourcing Party Evaluation Format). The Business Continuity Plan of Guardian Group Netherlands is designed to ensure compliance with the requirements of DNB Good Practice.

B.6 Compliance function

The role of the compliance function includes assessing whether the policies and procedures of GGNL, as well as the control measures implemented, are being adequately adhered to and compliance with applicable laws and regulations is achieved. The compliance function is tasked with verifying whether policies and procedures are being applied in practice and are effective.

Additionally, the compliance function is responsible for providing advice, both solicited and unsolicited, if compliance is inadequate or if the measures taken are ineffective and need to be updated. The primary responsibility for the compliance function rests with the CFRO. In order to ensure an adequate implementation of the compliance function, GGNL has established a Compliance Charter for GGNL. The Compliance Charter outlines the responsibilities, authorities, and reporting duties of the compliance function. This Compliance Charter is approved by the Executive Board.

The compliance function is carried out by a Compliance Officer who performs the duties based on an annual Compliance Plan to be developed by the Compliance Officer. The Compliance Plan outlines the planned activities as specifically as possible and is approved by the Board. The compliance function is internally assigned within GGNL.

C. Risk profile

C.1 Risk categories

GGNL annually revises its risk strategy and risk profile. The following risks are distinguished:

- Insurance technical risk
- Counterparty risk (including GA, bank, and reinsurance risk)
- Investment risk
- Outsourcing risk (including GA and IT risk)
- Environmental risk (including market and climate risk)
- Operational risk (including compliance, IT, process, business, information provision, product development, HR, and fraud risk)

The main risks from the above overview are subjected to scenario analyses in the ORSA.

C.2 Insurance technical risk

A possible increase in loss ratios jeopardizes the technical result of GGNL. Given the nature of GGNL's insurance products, continuous risk management and analysis are essential. Premium and claims overviews are continuously subjected to analysis by type and risk category. The overviews are periodically reviewed by the management. If the results warrant it, swift intervention is possible. Furthermore, this risk under Solvency II consists of premium and provisions risk, catastrophe risk and lapse risk.

Premium risk

Pertains to the upcoming period and involves the risk that premiums (including premium provisions) may prove inadequate to cover the claims and expenses.

Provision risk

Concerns the risk that the technical provisions are insufficient to cover the expenses and settlement of existing obligations.

Catastrophe risk

Is the risk that will occur due to extreme and/or exceptional events, which will negatively affect the financial position. The risk is composed of modules such as natural disaster risk (hail and windstorm) and man-made catastrophe risk. For the catastrophe risk, branch-specific scenarios are calculated, the outcomes of which are aggregated step by step.

Lapse risk

Refers to the risk that assumptions about the policyholder behavior turn out to be incorrect.

Reinsurance Program

GGNL mitigates significant fluctuations in claims costs and volatile results through reinsurance. The reinsurance program is structured to provide protection against both attritional losses and catastrophic losses. The contract was secured through Dutch brokers with global network. Despite positive loss ratio trends in recent years, the relative reinsurance premiums have increased due to the hardening reinsurance market. GGNL, as a primary insurer, reinsures through a panel of continental reinsurers, making use of a combination of Quota Share (QS) and Excess of Loss (XL) reinsurance. Per May 1, 2024 the reinsurance program was renewed and in order to retain more of our profitable book of business and in line with Group appetite, GGNL has increases the retention.

The insurance technical risk profile of GGNL is shown in the table below. As of 2024, GGNL has further improved the allocation of homogeneous risk groups to solvency II lines of business, which is why the insurance technical risk of GGNL is divided into non-life and health (similar to non-life) risk under Solvency II.

x € 1,000	2024	2023
Premium- and provision risk	4,335	3,414
Lapse risk	2,348	852
Catastrophe risk	4,432	3,149
Diversification	*3,797*	*2,155*
Non-life insurance risk	**7,318**	**5,260**
Premium- and provision risk	173	0
Lapse risk	119	0
Diversification	*82*	*0*
Health (similar to non-life) insurance risk	**210**	**0**

C.3 Counterparty risk

Counterparty (credit) risk is the risk of unforeseen losses that may result from bankruptcy or deterioration in the creditworthiness of debtors or counterparties to banks, reinsurance contracts, authorized agents or other intermediaries. GGNL manages this risk through arrangements with the authorized agents, by placing reinsurance contracts following the reinsurance policy of GGNL and by the credit rating of the counterparties which is a minimum of A (S&P) per 2024.

For counterparty risk, using the corresponding capital requirements, the risk profile can be explained as follows.

x € 1,000	2024	2023
Type 1	1.095	1.646
Type 2	306	407
Diversification	*61*	*83*
Counterparty risk (SCR)	**1.339**	**1.970**

C.4 Investment risk

Refers to the risk of value fluctuations in equity or bond investments. GGNL has opted for a prudent investment policy, emphasizing diversification and limiting potential risks rather than pursuing high returns. The investment portfolio of GGNL consists of government bonds, corporate bonds, deposits and cash. Since bonds and securities entail more risks, careful consideration is given to the risk associated with these investments. Investment risks are managed through the investment policy.

Exposure to investment risk is measured by the impact of fluctuations in the value of financial variables such as stock prices, interest rates, real estate values and exchange rates. The market risks to which GGNL is exposed are further explained below.

Interest rate risk

Refers to the sensitivity of the value of assets and liabilities to changes in the interest rate term structure or in the volatility of interest rates. The following interest rate sensitive assets and liabilities are on the balance sheet:

- Assets: government bonds, corporate bonds and deposits
- Liabilities: net best estimate technical provisions

Equity risk

Is the sensitivity of the value of assets, liabilities and financial instruments to changes in the level or volatility of market prices of equities. GGNL does not have any equities in the investment portfolio, so this risk is not applicable to GGNL.

Spread risk

Arises from the sensitivity of the value of investments to the level and volatility of credit spreads above the risk-free interest rate term structure. For GGNL, corporate bonds and deposits are sensitive to spread risk.

Concentration risk

Consists of the additional risks that an insurance company faces due to a lack of diversification in its asset portfolio or due to a high exposure to the risk of default of a single issuer of securities or a group related issuers. Concentration risk arises from the deposit account, which is exposed to a single bank.

For investment risks, the risk profile can be explained as follows, based on the corresponding capital requirements:

x € 1,000	2024	2023
Interest rate risk	564	331
Equity risk*	1	1
Real estate risk	0	0
Spread risk	470	278
Currency risk	0	0
Concentration risk	866	0
Diversification	*765*	*177*
Market risk (SCR)	**1,136**	**433**

** Material tangible assets are shocked under equity risk under Solvency II*

Liquidity risk

The risk of illiquidity of investments in the event of unexpectedly large payment obligations.

C.5 Outsoucing risk

Refers to the risk that the continuity, integrity, and/or quality of activities outsourced to third parties may be compromised. This risk is managed through the outsourcing policy.

C.6 Strategic and environmental risk

Environmental risk

Encompasses climate and market risks, which can be divided into physical risks and transition risks. These risks result from factors such as new government policies, new laws and regulations, technological developments, or changes in consumer preferences. This can affect companies in various ways, such as reducing profitability for CO_2-intensive sectors due to transition, leading to negative impacts on the valuation of their stocks and corporate bonds and the creditworthiness of their loans. Transition risks may also arise concerning government bonds of countries or regions highly dependent on revenues from fossil fuels. As GGNL's investment policy is prudently designed and focuses more on risk management than on high returns, the risk in this area is limited. The energy transition may also have a potential negative effect on economic growth, for example, if an abrupt transition leads to higher energy prices and thus lower consumer spending. This can lead to premium defaults and a shrinking commercial and private market.

Physical risks
Physical risks focus more on the insurer's obligations. GGNL provides coverage for natural catastrophes such as windstorm and hail damage. This makes the insurer sensitive to climate change if it leads to more extreme weather and severe catastrophes. The windstorm and hail risk are covered by purchasing excess-of-loss reinsurance. To mitigate the risk, GGNL has purchased a very high level of reinsurance coverage.

Finally, climate change may also lead to more frequent pandemics. For some types of insurance, this may have negative consequences. For example, a pandemic can lead to unnatural attrition and higher combined ratios.

C.7 Operational risk
Refers to the risk arising from the failure of internal processes and systems, availability of competent personnel, disasters, and changes in laws and regulations. GGNL has identified 5 operational risk categories:
- Processing Risk: the risk of inadequate processes and controls
- Business Risk: disasters (fire)
- Insufficient Information Provision: risk of information being untimely, incomplete, or unreliable.
- Product Development: risk of products not meeting the requirements of laws and regulations, the DNB, the AFM, or being unprofitable.
- HR Risk: illness or dependency risk can cause discontinuity in operations or loss of quality of work especially in a small organization like GGNL

IT risk
IT risk entails systems risk, IT failure and risk of unauthorized access to data. GGNL has a Business Continuity Management (BCM) plan which consists of two phases: the business impact analysis phase and the plan activation phase. The business impact analysis phase includes a risk analysis covering potential threats, emergencies, and scenarios that could jeopardize the continuity of GGNLs operations. It also outlines the risk mitigation measures already in place to minimize the occurrence of these scenarios. The activation of the BCM plan involves the actual execution of the plan. The plan includes a flowchart regarding the activation process along with a description.

Compliance and integrity risk
The risk of losses occurring due to non-compliance with legal obligations, inadequate legal documentation, and the risk of damage to the reputation, integrity, and financial condition of the organization due to non-compliance with laws, regulations, and internal business rules and policies, as well as late identification of significant developments in laws and regulations, potentially resulting in an inability to influence the ultimate outcome.

Fraud
We have included fraud and corruption in our SIRA (Systematic Integrity Risk Assessment). Fraud and
integrity risks are also included in our risk management tool. The SIRA and the Risk Tool are periodically recalibrated. Authorized Agents have the necessary controls to prevent insurance fraud and are in contact with GGNLs fraud expert for this purpose in respect of claims handling. GGNL also uses Group fraud policy that applies to all of GGNL activities.

Climate
GGNL analysed a climate risk within its Own Risk and Self-Assessment(ORSA), which showed that GGNL is well protected by reinsurance contracts to mitigate this risk. We will assess the regulation in relation to these topics moving forward and address the requirements in upcoming years when necessary.

GGNL's vision regarding our role in sustainability is aim for a well-functioning society, which can only exist with a healthy equilibrium between people and nature. For these reasons we target to make a positive contribution to the restoration and preservation of nature. In line with these objectives, we have mandated our external asset manager to invest our portfolio.

The GGNL sustainable investment strategy promotes ecological and social characteristics, but does not have a pure sustainable investment objective. The strategy follows a sustainable investment policy and has a minimum share of 'sustainable investments' of 20%. This is a percentage linked to investments that are classified as “art 9” in accordance with the Sustainable Finance Disclosure Regulation (SFDR). Within the sustainable investment strategy, ESG criteria play a major role in the selection of investments, but financial goals are also important. Investments are made directly in shares and bonds of companies and governments as well as in actively and passively managed investment funds.

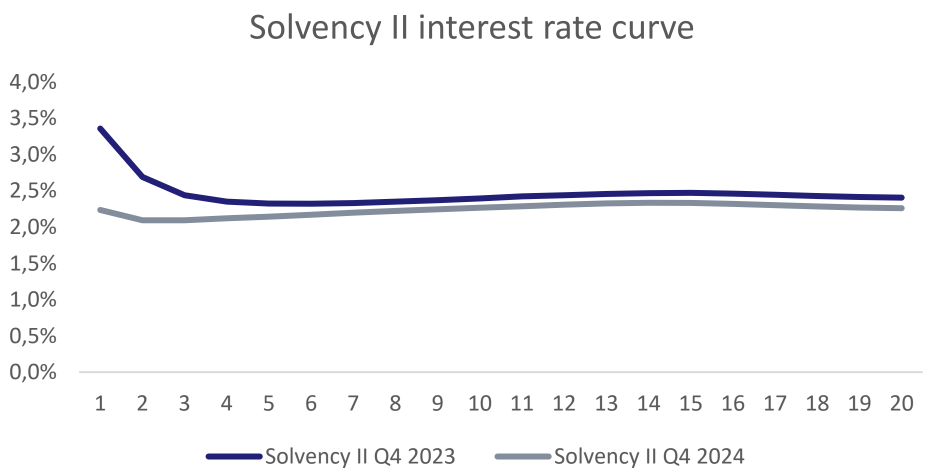
D. Valuation for Solvency II purposes

D.1 Solvency II Balance Sheet

Under Solvency II, all assets and liabilities must be valued at market value. The following paragraphs will discuss the determination of the market valuation per component. All amounts mentioned in this paragraph are a multiple of € 1,000 unless otherwise indicated.

Overall, the following assumptions apply:

- The Solvency II Standard Model is used to calculate the solvency requirement;
- No (Partial) Internal Model is used for the calculations, and no Undertaking Specific Parameters (USP's) are used.
- No transitional measures have been used, with the result that the full shock as established in the Standard Model is applied to relevant components.
- The Solvency II Forward Rate Structure (as of applicable reference date) as published by EIOPA is used for the calculations. No Volatility Adjustment (VA) or Matching Adjustment (MA) is used for the calculations (not applicable to GGNL). The figure below shows the Solvency II interest rate curve.



The current financial statements are compiled in accordance with the principles of Dutch GAAP (BW2:9). The balance sheet as of Q4 2024 was used to compile GGNL's market value (Solvency II) balance sheet. The change to Solvency II accounting principles results in a change in the value of assets and liabilities. A summary of the balance sheet on Dutch GAAP (BW2.9) and Solvency II accounting principles is shown in the table below.

The differences between the Solvency II balance sheet and book value balance sheet follow from the following causes:

- Under Solvency II, the share of reinsurance in the technical provision must be shown separately as an asset on the balance sheet and is therefore included on the asset side. The valuation of the share of reinsurance in the technical provision is based on the so-called "Best Estimate" (BE) or market value of the technical provisions. This is explained in more detail in the next section of this report.
- Netting of deferred tax assets against deferred taxes. This takes into account the conclusions and proposed methodology from DNB's investigation into deferred taxes on the Solvency II balance sheet.
- Under Solvency II, Goodwill is valued at € 0 on the balance sheet.
- Investments based on market value on the Solvency II balance sheet.
- Other balance sheet items on the asset side have already been valued in a manner applicable under Solvency II. This concerns balance sheet items land and buildings, receivables, and cash and cash equivalents.

- The gross technical provisions on the liabilities side are valued at market value under Solvency II. Explanations on this are included in the following paragraph.
- The equity under Solvency II is supplemented by a reconciliation reserve following the effects of revaluation of assets and liabilities under Solvency II, this is further explained in one of the following paragraphs.

GGNL's financial position under Solvency II principles is summarized as follows:

Assets	BW2.9	Solvency II	Liabilities	BW2.9	Solvency II
Goodwill	**3,787**	**0**	**Own funds**	**24,402**	**21,971**
			Ordinary share capital	100	100
Deferred tax asset (DTA)	**0**	**845**	Share premium	18,634	18,634
			Undistributed profit	5,668	5,668
Property, plant, equipment	**1**	**1**	Reconciliation reserve	0	-2,431
Investments	**28,704**	**29,232**	**Technical provisions**	**42,597**	**34,492**
Government Bonds	14,669	14,908	Claim provision	37,767	36,574
Corporate Bonds	9,035	9,322	Premium provision	4,830	-3,804
Deposit	5,000	5,002	Risk margin	0	1,722
Reinsurance recoverables	**33,588**	**25,672**	**Deferred tax liability (DTL)**	**0**	**0**
Insurance receivables	**2,039**	**2,039**	**Payables**	**4,114**	**4,114**
			Insurance payables	839	839
Cash	**2,707**	**2,788**	Reinsurance payables	2,624	2,624
			Trade payables	651	651
Other assets	**286**	**0**			
Total assets	**71,112**	**60,577**	**Total liabilities**	**71,112**	**60,577**

General assets and liabilities are valued at fair value, unless otherwise stated separately. Any deviations will be specifically disclosed.

D.2 Assets

Netting of assets and liabilities

Financial assets and liabilities are offset in the balance sheet if Guardian has a legally enforceable right to do so and also intends to settle the asset and liability on a net basis or simultaneously after offsetting.

Investments

The investments are valued at market value, including any accrued interest. For listed shares and bonds, the market value is based on the market value as of the balance sheet date. The realized and unrealized results (including foreign exchange results) for the reporting year are recognized in the income statement. The realized and unrealized results for the reporting year are recognized in the income statement.

Receivables

The receivables are valued at amortized cost, where necessary net of an allowance for potential impairment. The estimate for impairment is determined based on the estimated creditworthiness of each individual receivable.

Tangible fixed assets
Included in the tangible fixed assets are acquisitions of information processing equipment, office machinery, furniture and fixtures, and telecommunication equipment. They are valued at acquisition cost less depreciation. Depreciation is calculated on a straight-line basis over five years. No residual value is taken into account.

Cash and cash equivalents
Cash at banks and in hand represent cash in hand, bank balances and deposits with terms of less than twelve months. Overdrafts at banks are recognized as part of debts to lending institutions under current liabilities. Cash at banks and in hand is measured at nominal value.

D.3 Technical provisions
In accordance with Solvency II, the technical provisions are expected to be determined at market value. The resulting provisions are part of the Solvency II balance sheet which is shown in the previous table. The provisions consist of the following parts:
- Best estimate claims provisions
- Best estimate premium provisions
- Risk Margin

Homogenous risk groups
When calculating the technical provisions, insurance companies divide their insurance liabilities into homogenous risk groups (HRGs). The segmentation of the insurance liabilities in HRGs should reflect the risks of the underlying liabilities.

The technical provisions of GGNL are divided into the HRG on the level of 'insurance branches' according to the article 80 van de Guidelines 2009/13/EG and article 55 of the Delegated Acts. The insurance contracts of GGNL have different risk properties and are therefore split into several homogenous risk groups. These are shown in the table below.

Solvency II branch	HRG GGNL
Motor vehicle liability insurance	Motor
Other motor insurance	Motor
Marine, aviation and transport insurance	Marine
Fire and other damage to property insurance	Property
General liability insurance	Casualty
Income protection insurance	Accident

This division to HRGs is used in the valuation of the de best estimate and the risk margin.

Best estimate claim provisions
The claim provisions relate to the claim events that have already occurred regardless of whether or not the damages resulting from these events have already been reported.

In order to determine the best estimate claims provision, a forecast must be made of future payments for damages that have already occurred but have not yet been paid in full (claim provisions) or have not yet been reported (IBNR). Provisions for unallocated claims handling costs also form a part of the best estimate claim provisions.

The determination of the ultimate claim provision and the best estimate claim provision is done by using claim development methods. The application of claim development methods for determining the provision is a basic technique used in claim actuarial science. There are various claim development methods. GGNL uses the Chain Ladder method. This method can be used to determine how the claim provision or claim payments for damages from a certain period (often a claim year) develop over time. This is done by determining the development of the cumulative value per annual layer. A development pattern can then be determined for all annual layers.

For GGNL, year-to-year claim triangles are used to determine a development pattern per year. Based on the development patterns per claim year, the basic development pattern is estimated. This is called the Best Estimate development pattern. By using this pattern, an estimate can be made of the total development of all months towards the future.

In addition to the estimate of the best estimate loss provision based on the method described above, an additional provision is applied for the claim handling costs. The provision for claim handling costs consists of the costs associated with the settlement of outstanding and IBNR claims over the risk period that has already elapsed. A further explanation of the determination of the best estimate loss provision (including claim handling costs) is included in the Solvency II manual.

Best estimate premium provisions

The premium provision relates to future claims events that need to be covered by the existing insurance contracts.

The premium provision is also determined at market value. The simplification formula specified in Annex III of the 'Guidelines on Valuation of Technical Provisions', EIOPA BoS-14/166, has been used. The best estimate is then derived as follows:

BE = CR * VM + (CR-1) * PVFP + AER * PVFP

The following input data are required for applying this simplification formula:

- **VM**: Volume measure for unearned premiums; this relates to business generated as of the valuation date and represents the premiums for this business, minus the premiums already earned under these contracts (determined on a pro rata temporis basis).
- **PVFP**: Present value of future premiums for the underlying obligations (so far as future premiums fall within the applicable contract boundaries of Solvency II).
- **CR**: Estimate of the combined ratio (CR) for the relevant contracts.
- **AER**: Estimate of the applicable acquisition expense ratio.

For future premiums, the expected result on these contracts is included in the premium provision. In the case of profitable policies, there is a negative premium provision for future premiums.

Risk Margin

In addition to determining the best estimate of the provision, a risk margin is determined. The risk margin is established by GGNL based on simplification method 2 in accordance with guideline 61 (1.114) of the Solvency II Guidelines (EIOPA-BoS-14/166) regarding the valuation of technical provisions. Here, the runoff of the provisions serves as a proxy for the runoff of the future SCR and the associated 'cost of capital' of 6% (Art. 39 of the Delegated Regulation).
This projection of the 'cost of capital' is then discounted based on the Solvency II term structure as of Q4 2024 as published by EIOPA. No Volatility Adjustment (VA) has been used for the calculations.

Other Liabilities

The other liabilities of GGNL have already been valued in a manner that aligns with the principles of Solvency II and market valuation.

Results

In the table below the total Solvency II discounted technical provisions are shown for calculation period Q4 2024 and Q4 2023.

Technical Provisions		Q4 2023	Q4 2024	Difference
Gross	Claim Provisions	30,898	36,574	5,676
Gross	Premium Provisions	2,377	-3,804	-6,181
Gross	Risk Margin	1,729	1,722	-7
Gross	**Total**	**35,004**	**34,492**	**-512**
Reinsured	Claim Provisions	25,622	29,031	3,409
Reinsured	Premium Provisions	1,846	-3,359	-5,205
Reinsured	Risk Margin	0	0	0
Reinsured	**Total**	**27,467**	**25,672**	**-1,795**
Net	Claim Provisions	5,276	7,543	2,267
Net	Premium Provisions	531	-445	-976
Net	Risk Margin	1,729	1,722	-7
Net	**Total**	**7,537**	**8,820**	**1,283**

In the table above, it can be seen that there is a gross market value provisions (consisting of the best estimate and the risk margin) of € 34,492, of which € 36,574 is allocated to the claims provisions, € -/- 3,804 is allocated to the premium provisions and € 1,722 is allocated to the Risk Margin. After reinsurance (after adjustment for expected losses due to counterparty defaults), a total market value provision of € 8,820 remains, of which € 7,543 is allocated to the claims provisions, € -/- 445 is allocated to the premium provisions and € 1,722 is allocated to the Risk Margin.

The gross Solvency II market value of the provisions has decreased by € -/- 512 compared to the previous year. The net Solvency II market value of the provisions has increased by € 1,283 compared to the previous year. The increase in provisions is mainly due to the increase in claim provisions.

D.4 Other liabilities

Payables

Payables are valued at nominal value.

Deferred tax liabilities

The corporate income tax payable or recoverable for the year is based on the taxable profit for the year, after any adjustments for prior years. Deferred tax assets and liabilities are recognized for temporary differences between the valuation of assets and liabilities according to tax regulations on one hand and the valuation principles followed in these financial statements on the other hand. The calculation of deferred tax assets and liabilities is based on the tax rates applicable at the end of the reporting period or on future rates for upcoming years, to the extent already enacted by law.

Deferred tax assets are recognized to the extent that it is probable that taxable profits will be available against which the temporary differences can be offset in the future. Deferred tax assets and liabilities are offset when there is a legally enforceable right to offset current tax assets against current tax liabilities and the deferred tax items relate to the same tax authority.

E. Qualitative information about capital management

E.1 Own funds

The Solvency II eligible own funds of GGNL consist of Tier 1 and Tier 3 own funds. The composition of the own funds are shown in the table below.

Eligible own funds	BW2.9	Solvency II
Tier 1 own funds	**24,402**	**19,187**
Ordinary share capital	100	100
Share premium	18,634	18,634
Undistributed profit	5,668	5,668
Reconciliation reserve	0	-3,277
Foreseeable dividend	0	-1,938
Tier 2 own funds	**0**	**0**
Tier 3 own funds	**0**	**845**
Deferred tax asset (DTA)	0	845
Total eligible own funds	**24,402**	**20,033**

Under Solvency II, the balance sheet is based on market valuations. This leads to an eligible own funds of € 20,033 under Solvency II compared to € 24,402 under current accounting principles (BW2.9). The difference comes from the reconciliation reserve; the revaluation of assets and liabilities under Solvency II. In addition, GGNL has a net deferred tax asset (DTA) on the Solvency II balance sheet at Q4 2024 which is included under Tier 3 capital. In substantiating the net DTA, the conclusions and proposed methodology from DNB's investigation into deferred taxes on the Solvency II balance sheet have been taken into account. Based on the capital policy, a foreseeable dividend of 75% of the book value result has been taken into account for the Solvency II eligible own funds.

In the table below, the valuation differences between the current accounting principles and Solvency II principles are shown.

Own funds	
BW2.9	**24,402**
Reconciliation goodwill	-3,787
Reconciliation DTA	845
Reconciliation investments	322
Reconciliation technical provisions	1,910
Addition risk margin	-1,722
Solvency II available own funds	**21,971**
Foreseeable dividend	-1,938
Solvency II eligible own funds	**20,033**

Reconciliation of balance sheet items leads to an available own funds under Solvency II of € 21,971 and an eligible own funds under Solvency II of € 20,033. The difference lies in the foreseeable dividend, which is determined as 75% of the 2024 year-end result, in accordance with the Capital and Dividend policy. This is the first time GGNL foresees to pay dividend to its shareholders. For the calculation of the SCR ratio and MCR ratio, available capital is ranked by Tier classification. GGNL's available capital under Solvency II principles consists of Tier 1 and Tier 3 capital. Tier 1 capital can be fully utilized for solvency requirements. For Tier 3 capital, the following restrictions apply:

- The SCR consists of at least 50% of Tier 1 capital and no more than 15% of Tier 3 capital. Tier 2 capital and Tier 3 capital may count for up to 50%. At Q4 2024, the DTA position may be fully included in Solvency II eligible own funds.
- The MCR must be fully covered by core capital, of which at least 80% is Tier 1 quality and no more than 20% is Tier 2 quality. Tier 3 capital is not allowed.

E.2 Solvency Capital Requirement

The required solvency consists of two standards: the Solvency Capital Requirement (SCR) and the Minimum Capital Requirement (MCR) as a hard lower limit. Both have been determined by GGNL as of Q4 2024 based on the standard model of Solvency II. The results are shown below.

Solvency ratio (SCR)	
Eligible own funds	20,033
SCR	10,520
SCR ratio	**190%**

Solvency ratio (MCR)	
Eligible own funds	19,187
MCR	4,000
MCR ratio	**480%**

Per Q4 2024 the Solvency ratio is equal to 190% based on calculated SCR in accordance with the standard model following Solvency II regulation. The Solvency ratio is higher than the internal norm of 150% and internal target ratio of 175%.

The SCR is made up of various elements in accordance with the standard Solvency II model. The balance sheet items on the market value balance sheet are assigned to the various risk modules within the standard model. The composition of the SCR is shown below.

	Q4 2024
Market risk (total after diversification)	**1,136**
Interest rate risk	564
Equity risk	1
Spread risk	470
Concentration risk	866
Counterparty default risk (total after diversification)	**1,339**
Type 1	1,095
Type 2	306
Non-life underwriting risk (total after diversification)	**7,318**
Premium and reserve risk	4,335
Lapse risk	2,348
Catastrophe risk	4,432
Health underwriting risk (total after diversification)	**210**
Premium and reserve risk	173
Lapse risk	119
SCR	**10,520**
Total bSCR	8,465
Operational risk	2,055
LACDT	0

Eligible own funds	20,033
Tier 1	19,187
Tier 2	0
Tier 3	845
SCR ratio	**190%**

The various components of the SCR are explained in the following paragraphs.

Market risk

The market risk of GGNL is based on the investment portfolio, which exists of government bonds, corporate bonds and a deposit account. The underlying securities were analyzed based on look through information and assigned to the different risk modules within the standard model. Given the type of investments and that all investments are held in Euro, the real estate and currency risk modules are not applicable. Besides the investments, tangible fixed assets are shocked under equity risk. The investments are allocated to the market risk sub modules as follows:

Investments	Solvency II	Interest rate	Equity	Spread	Concentration
Government bonds	14,908	x			
Corporate bonds	9,322	x		x	x
Deposit account	5,002	x		x	x
Tangible fixed assets	1		x		x
Total	**29,233**				

Within the market risk module, the prescribed specifications in accordance with the "Delegated Regulation" have been used. The following comments apply here:

- Interest rate risk (€ 564): this includes all bonds and deposits with an interest rate sensitive character. This concerns government and corporate bonds and the deposit account with a total value of € 29,232.
- Spread risk (€ 470): all corporate bonds and the deposit account are subject to spread risk concerning a value of € 14,324.
- Equity risk (€ 1): tangible fixed assets are placed under the item property, plant, equipment (for own use) on the balance sheet and shocked under Equity risk Type 2.
- Concentration risk (€ 866): all of the above investments are included under concentration risk with the exception of exempt government bonds. However, the latter have been considered in determining the threshold above which concentration risk applies. Concentration risk results from the deposit account which is held at a single counterparty.

Additionally, it should be mentioned that the interest rate term structure used by GGNL for valuation of the liabilities is equal to the Solvency II interest rate term structure published by EIOPA as of Q4 2024. GGNL does not use Volatility Adjustment or Matching Adjustment. The prescribed interest rate shocks have been implemented by GGNL from which a sensitivity to a possible increase in interest rates remains. The corresponding correlation matrix has been used for aggregation of market risks among them. To determine the creditworthiness of the various exposures, the rating as published by S&P is used. This is in line with Article 4 of the Delegated Regulation.

Counterparty default risk

The counterparty risk of GGNL consists of the default risk on counterparties in accordance with the Solvency II classification:

- Type 1 (€ 1,095): this refers to a limited number of larger counterparties who possess a credit rating. In the case of GGNL, these include banks and reinsurers.

    - Banks: liquid assets with a value of € 2,788 are held at one bank (ING). Based on the credit rating, the corresponding SCR has been determined.
    - Reinsurers: the receivables from reinsurers, the reinsurance portion of the technical provisions for claims payable and reinsurance premiums paid (together amounting to € 25,672) have a selection of reinsurers as counterparties. Based on the credit rating, the corresponding SCR has been determined. These parties have an 'A' rating or an 'AA' rating.
    - Risk mitigation: based on the difference between the SCR (for underwriting risk in particular) with and without reinsurance, the risk mitigating effect of reinsurance has been determined. This has been divided among the current reinsurers in the reinsurance program and based on the credit rating the corresponding SCR has been determined.
- Type 2 (€ 306): these are other counterparties which do not have a credit rating. In the case of GGNL, this concerns the receivables on the balance sheet.
    - Receivables from direct insurance (including intermediaries) of € 2,039.

The counterparty risk of GGNL per Q4 2024 is shown below.

Type 1	Exposure	Capital requirement
Reinsurance related	25,672	993
Cash balance	2,788	187
Total type 1 exposure (before diversification)	**28,460**	**1,180**
Diversification		85
Total type 1 exposure (after diversification)		**1,095**

Type 2	Exposure	Capital requirement
Receivables on intermediaries	2,039	306
Total type 1 exposure	**2,039**	**306**

When considering the capital requirement for exposures on reinsurers, it should be noted that this also includes the risk-mitigating effect of reinsurance. This effect is not part of the actual exposure. On balance, a relatively low capital requirement for counterparty risk on reinsurers remains due to the solid credit ratings of these parties and the distribution between them. The capital requirement for reinsurance equals € 993. Liquid assets have a capital requirement of € 187, where the total exposure is allocated to one bank. The prescribed shock of 15% has been applied to the Type 2 exposure. The total capital requirement for counterparty risk is € 1,339 after diversification.

Underwriting risk

The underwriting risk of GGNL is divided between non-life and health (similar to non-life) underwriting risk. The underwriting risk consists of the following components:

- Non-life underwriting risk (€ 7,318)
  - Premium and reserve risk (€ 4,335): this risk is based on the expected net premiums for the next 12 months and the net claim provisions of GGNL. The parameters of the Solvency II standard formula have been used. Geographical diversification is not applicable and Undertaking Specific Parameters (USP's) have not been applied either.
  - Lapse risk (€ 2,348): this risk is applicable, as the various homogenous risk groups of GGNL are expected to be profitable. Per Q4 2024, the lapse risk is based on the expected profits in future premiums (EPIFP) within contract boundaries. Lapse risk quantifies the risk of losses when policies are terminated prematurely. Lapse risk is calculated in accordance with the standard model as 40% of expected profits in future premiums for profitable lines of business only.
  - Catastrophe risk (€ 4,432): catastrophe risk consists of various modules for various branches and risks of GGNL. The standard model has been followed in the calculation of the catastrophe risks. The reinsurance program of GGNL has been taken into account.

- Health underwriting risk (€ 210)
  - Premium and reserve risk (€ 173): this risk is based on the expected net premiums for the next 12 months and the net claim provisions of GGNL. The parameters of the Solvency II standard formula have been used. Geographical diversification is not applicable and Undertaking Specific Parameters (USP's) have not been applied either.
  - Lapse risk (€ 119): this risk is applicable, as the homogenous risk group, Accident, of GGNL is expected to be profitable. Per Q4 2024, the lapse risk is based on the expected profits in future premiums (EPIFP) within contract boundaries. Lapse risk quantifies the risk of losses when policies are terminated prematurely. Lapse risk is calculated in accordance with the standard model as 40% of expected profits in future premiums for profitable lines of business only.

Operational risk

According to standard model (Article 204 of Delegated Regulation), operational risk is derived from the volume of technical provisions and premium. The maximum of the premium and provisions component is taken as the starting point. Furthermore, the operational risk is capped at 30% of the combined SCR risks. In the case of GGNL, the premium-based component applies as the base and 3% of the premium is used as the basis for operational risk. This results in a capital requirement of € 2,055. The 30% cap on combined SCR risks is not touched in this case.

Loss absorbing capacity of deferred taxes (LACDT)

When determining required solvency, the loss-absorbing capacity of deferred taxes (LACDT) may be applied. This follows from Article 207 of the Delegated Regulation and the rationale that losses are tax deductible. To determine the height of the LACDT, the loss may be set to the sum of the basic SCR and the SCR for operational risk, taking into account the corporate tax. GGNL does not use the loss absorbing capacity of deferred taxes (LACDT) in determining required solvency per Q4 2024.

E.3 ORSA

The Own Risk and Solvency Assessment ('ORSA') of GGNL is a forward-looking assessment of GGNL's capital position. The ORSA integrates risk and capital management with GGNL's business planning processes. In this context, the risk approach is aligned with the business strategy, the execution of the strategy is closely monitored, and risks are timely identified. Based on the business strategy and the risk profile, a baseline projection is prepared. This projection is then confronted with the key stress scenarios for GGNL. Based on the outcomes, an assessment can be made of the robustness of the capital position and strategy, and to what extent the current business strategy aligns with the risk appetite. It also includes an assessment of the significance of the deviation of the company's risk profile from the assumptions underlying the Solvency Capital Requirement ('SCR') calculation model. The ORSA policy is reviewed and updated annually.

Approach

The ORSA is a continuous process building upon existing risk and capital management and business planning processes. It consolidates these processes under a single framework, assessing the alignment of available equity and risk appetite with strategic objectives, and their adequacy for the projection period.

This process yields the following outcomes:

- Assessment of overall solvency capital requirements, considering GGNL's specific risk profile, approved risk appetite limits, and GGNL's business strategy.
- Continuous compliance with capital requirements and technical provisions (premium and claims reserves).
- Comparison of the risk profile with the assumptions underlying the solvency capital requirement.

GGNL employs the standard model as indicated in Solvency II for determining the solvency capital requirement (SCR) and preferred risk limits. GGNL's risk profile is determined by customer needs, GGNL's ability to manage related risks, GGNL's risk appetite, and the availability of sufficient equity to assume risk.

Risks are identified and assessed based on their potential impact on business objectives and ultimately on the ability to meet insurance obligations. Thematic risk discussions or risk sessions will regularly take place within departments regarding the execution of activities.
Additionally, an annual risk session is organized, during which the Risk Tool, among other things, is reviewed and recalibrated.

Capital projections are made based on historical experience combined with expectations about the future as outlined in the annual plans. These projections are compared against both internal norm thresholds and statutory requirements Solvency capital requirements SCR and MCR (Minimum Capital Requirement).

Scenario analyses are used to assess whether the available and future capital is sufficient for expected (base scenario) and stressed situations. Additionally, the suitability of the applied risk limits is tested through scenario analyses. If the available capital falls below the norm solvency or SCR, the capital policy and the Preparatory Crisis Plan (VCP) provide measures to restore the capital position.

The recovery measures from the Preparatory Crisis Plan (VCP) come into effect in the event of a significant deterioration of the financial position (crisis scenario) and include, according to article 26.5 section 3 Bpr at least:

- a threatened or actual breach of the solvency capital requirement (the SCR);
- a threatened or actual breach of the minimum capital requirement (the MCR);
- as well as a threatened or actual deterioration of the liquidity position.

ORSA process

GGNL conducts an annual ORSA to fulfill its ORSA policy. The executive board initiates the process, involving all relevant disciplines, responsible parties, and key personnel within GGNL. Periodically, the Supervisory Board assesses at a strategic level to what extent the business activities align with GGNL's risk appetite. The necessary underlying documents regarding risk appetite are provided to the Supervisory Board and discussed during the annual review of the ORSA. The ORSA is independently assessed by the actuarial function.

Conclusion

The ORSA has been discussed with the Supervisory Board, approved and delivered to De Nederlandsche Bank. The key conclusion of the ORSA 2024 is that GGNL's solvency position is solid and robust given the risks and stress scenarios. In the base scenario, the solvency position remains above statutory and internal norms. Only in severe scenarios, the solvency position falls below the internal norm. The solvency position can be restored by taking appropriate measures. The application of such measures follows GGNL's capital policy and is separately assessed for each situation to ensure alignment with the prevailing circumstances.

S.02.01.01 Balance Sheet

		Solvency II value
		C0010
Assets		
Goodwill	R0010	
Deferred acquisition costs	R0020	
Intangible assets	R0030	0
Deferred tax assets	R0040	845,372
Pension benefit surplus	R0050	0
Property, plant & equipment held for own use	R0060	1,095,00
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	29,231,639
Property (other than for own use)	R0080	0
Holdings in related undertakings, including participations	R0090	0
Equities	R0100	0
Equities - listed	R0110	0
Equities - unlisted	R0120	0
Bonds	R0130	24,229,555
Government Bonds	R0140	14,907,729
Corporate Bonds	R0150	9,321,826,
Structured notes	R0160	0
Collateralised securities	R0170	0
Collective Investments Undertakings	R0180	0
Derivatives	R0190	0
Deposits other than cash equivalents	R0200	5,002,083
Other investments	R0210	0
Assets held for index-linked and unit-linked contracts	R0220	0
Loans and mortgages	R0230	0
Loans on policies	R0240	0
Loans and mortgages to individuals	R0250	0
Other loans and mortgages	R0260	0
Reinsurance recoverables from:	R0270	25,672,068
Non-life and health similar to non-life	R0280	25,672,068
Non-life excluding health	R0290	25,133,726
Health similar to non-life	R0300	538,341
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	0
Health similar to life	R0320	0
Life excluding health and index-linked and unit-linked	R0330	0
Life index-linked and unit-linked	R0340	0
Deposits to cedants	R0350	0
Insurance and intermediaries receivables	R0360	2,038,836
Reinsurance receivables	R0370	0
Receivables (trade, not insurance)	R0380	0
Own shares (held directly)	R0390	0
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	0
Cash and cash equivalents	R0410	2,787,608
Any other assets, not elsewhere shown	R0420	0
Total assets	R0500	60,576,620
Liabilities		
Technical provisions - non-life	R0510	34,492,072
Technical provisions - non-life (excluding health)	R0520	33,806,991
Technical provisions calculated as a whole	R0530	0
Best Estimate	R0540	32,131,028
Risk margin	R0550	1,675,963
Technical provisions - health (similar to non-life)	R0560	685,081
Technical provisions calculated as a whole	R0570	0
Best Estimate	R0580	638,709
Risk margin	R0590	46,371
Technical provisions - life (excluding index-linked and unit-linked)	R0600	0
Technical provisions - health (similar to life)	R0610	0
Technical provisions calculated as a whole	R0620	0
Best Estimate	R0630	0
Risk margin	R0640	0
Technical provisions - life (excluding health and index-linked and unit-linked)	R0650	0
Technical provisions calculated as a whole	R0660	0
Best Estimate	R0670	0
Risk margin	R0680	0
Technical provisions - index-linked and unit-linked	R0690	0
Technical provisions calculated as a whole	R0700	0
Best Estimate	R0710	0
Risk margin	R0720	0
Other technical provisions	R0730	
Contingent liabilities	R0740	0
Provisions other than technical provisions	R0750	0
Pension benefit obligations	R0760	0
Deposits from reinsurers	R0770	0
Deferred tax liabilities	R0780	0
Derivatives	R0790	0
Debts owed to credit institutions	R0800	0
Financial liabilities other than debts owed to credit institutions	R0810	0
Insurance & intermediaries payables	R0820	838,680
Reinsurance payables	R0830	2,624,329
Payables (trade, not insurance)	R0840	650,962
Subordinated liabilities	R0850	0
Subordinated liabilities not in Basic Own Funds	R0860	0
Subordinated liabilities in Basic Own Funds	R0870	0
Any other liabilities, not elsewhere shown	R0880	0
Total liabilities	R0900	38,606,045
Excess of assets over liabilities	R1000	21,970,574

S.05.01.01 Premiums, claims and expenses

		Income protection insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and damage to property	General liability insurance	Total
		C0020	C0040	C0050	C0060	C0070	C0080	C0200
Premiums written								
Gross - Direct Business	R0110	1,402,835	4,346,010	5,848,493	491,374	46,045,191	9,598,554	67,732,456
Gross - Proportional reinsurance accepted	R0120							
Gross - Non-proportional reinsurance accepted	R0130							
Reinsurers' share	R0140	1,073,056	3,365,207	4,505,477	376,035	36,541,412	7,362,043	53,223,229
Net	R0200	329,779	980,804	1,343,017	115,338	9,503,779	2,236,511	14,509,227
Premiums earned								
Gross - Direct Business	R0210	1,407,210	4,466,691	5,960,171	491,165	46,552,984	9,612,158	68,490,379
Gross - Proportional reinsurance accepted	R0220							
Gross - Non-proportional reinsurance accepted	R0230							
Reinsurers' share	R0240	1,083,346	3,509,507	4,691,749	378,082	37,142,771	7,358,561	54,164,017
Net	R0300	323,864	957,184	1,268,422	113,083	9,410,214	2,253,596	14,326,363
Claims incurred								
Gross - Direct Business	R0310	510,957	4,510,320	2,328,368	37,153	21,739,124	5,527,253	34,653,175
Gross - Proportional reinsurance accepted	R0320							
Gross - Non-proportional reinsurance accepted	R0330							
Reinsurers' share	R0340	426,928	3,658,052	1,802,998	27,792	16,751,487	4,334,943	27,002,199
Net	R0400	84,030	852,268	525,370	9,361	4,987,636	1,192,310	7,650,975
Expenses incurred	R0550	89,900	97,927	107,565	32,072	2,402,402	896,715	3,626,580
Administrative expenses								
Gross - Direct Business	R0610	4,458	14,150	18,881	1,556	147,472	30,450	216,965
Gross - Proportional reinsurance accepted	R0620							
Gross - Non-proportional reinsurance accepted	R0630							
Reinsurers' share	R0640	-	-	-	-	-	-	
Net	R0700	4,458	14,150	18,881	1,556	147,472	30,450	216,965
Investment management expenses								
Gross - Direct Business	R0710	833	2,645	3,530	291	27,570	5,693	40,563
Gross - Proportional reinsurance accepted	R0720							
Gross - Non-proportional reinsurance accepted	R0730							
Reinsurers' share	R0740							
Net	R0800	833	2,645	3,530	291	27,570	5,693	40,563
Claims management expenses								
Gross - Direct Business	R0810	3,820	12,125	16,179	1,333	126,366	26,092	185,915
Gross - Proportional reinsurance accepted	R0820							
Gross - Non-proportional reinsurance accepted	R0830							
Reinsurers' share	R0840							
Net	R0900	3,820	12,125	16,179	1,333	126,366	26,092	185,915
Acquisition expenses								
Gross - Direct Business	R0910	439,588	1,151,884	1,512,258	153,954	14,034,699	3,266,183	20,558,567
Gross - Proportional reinsurance accepted	R0920							
Gross - Non-proportional reinsurance accepted	R0930							
Reinsurers' share	R0940	409,032	1,242,322	1,656,040	142,595	13,595,483	2,774,823	19,820,295
Net	R1000	30,556	-90,438	-143,781	11,359	439,216	491,361	738,272
Overhead expenses								
Gross - Direct Business	R1010	50,232	159,445	212,757	17,533	1,661,778	343,120	2,444,866
Gross - Proportional reinsurance accepted	R1020							
Gross - Non-proportional reinsurance accepted	R1030							
Reinsurers' share	R1040							
Net	R1100	50,232	159,445	212,757	17,533	1,661,778	343,120	2,444,866
Balance - other technical expenses/income	R1210							473,400
Total technical expenses	R1300							4,099,980

S.17.01.01 Non – life Technical Provisions

		Income protection	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport	Fire and damage to property	General liability insurance	Total
		C0030	C0050	C0060	C0070	C0080	C0090	C0180
Technical provisions calculated as a whole	R0010	0	0	0	0	0	0	0
Direct business	R0020	0	0	0	0	0	0	0
Accepted proportional reinsurance business	R0030	0	0	0	0	0	0	0
Accepted non-proportional reinsurance	R0040							0
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	0	0	0	0	0	0	0
Technical provisions calculated as a sum of BE and RM								
Best estimate								
Premium provisions								
Gross - Total	R0060	-345,999	-283,716	-276,299	-115,516	-2,051,701	-731,073	-3,804,304
Gross - direct business	R0070	-345,999	-283,716	-276,299	-115,516	-2,051,701	-731,073	-3,804,304
Gross - accepted proportional reinsurance business	R0080	0	0	0	0	0	0	0
Gross - accepted non-proportional reinsurance business	R0090							0
Total recoverable from reinsurance/SPV and Finite Re before the adjustment for expected losses due to counterparty default	R0100	-252,802	-59,246	-28,472	-87,153	-2,149,447	-776,194	-3,353,314
Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses	R0110	-252,802	-59,246	-28,472	-87,153	-2,149,447	-776,194	-3,353,314
Recoverables from SPV before adjustment for expected losses	R0120	0	0	0	0	0	0	0
Recoverables from Finite Reinsurance before adjustment for expected losses	R0130	0	0	0	0	0	0	0
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140	-252,896	-59,792	-29,132	-87,187	-2,153,494	-776,868	-3,359,369
Net Best Estimate of Premium Provisions	R0150	-93,103	-223,924	-247,167	-28,329	101,793	45,795	-444,935
Claims provisions								
Gross - Total	R0160	984,709	7,698,719	1,151,463	20,768	17,830,723	8,887,660	36,574,042
Gross - direct business	R0170	984,709	7,698,719	1,151,463	20,768	17,830,723	8,887,660	36,574,042
Gross - accepted proportional reinsurance business	R0180	0	0	0	0	0	0	0
Gross - accepted non-proportional reinsurance business	R0190							0
Total recoverable from reinsurance/SPV and Finite Re before the adjustment for expected losses due to counterparty default	R0200	791,380	6,428,302	907,216	15,525	13,971,962	6,922,310	29,036,695
Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses	R0210	791,380	6,428,302	907,216	15,525	13,971,962	6,922,310	29,036,695
Recoverables from SPV before adjustment for expected losses	R0220	0	0	0	0	0	0	0
Recoverables from Finite Reinsurance before adjustment for expected losses	R0230	0	0	0	0	0	0	0
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240	791,237	6,427,138	907,051	15,522	13,969,432	6,921,057	29,031,437
Net Best Estimate of Claims Provisions	R0250	193,471	1,271,581	244,412	5,246	3,861,291	1,966,603	7,542,605
Total Best estimate - gross	R0260	638,710	7,415,003	875,165	-94,748	15,779,022	8,156,587	32,769,738
Total Best estimate - net	R0270	100,369	1,047,657	-2,755	-23,083	3,963,084	2,012,398	7,097,670
Risk margin	R0280	46,372	362,546	54,224	978	839,680	418,535	1,722,335
Amount of the transitional on Technical Provisions								
TP as a whole	R0290							0
Best estimate	R0300							0
Risk margin	R0310							0
Technical provisions - total								
Technical provisions - total	R0320	685,082	7,777,549	929,389	-93,770	16,618,702	8,575,122	34,492,073
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	R0330	538,341	6,367,345	877,919	-71,665	11,815,938	6,144,189	25,672,068
Technical provisions minus recoverables from reinsurance/SPV and Finite Re- total	R0340	146,740	1,410,203	51,470	-22,105	4,802,764	2,430,933	8,820,005
Line of Business: further segmentation (Homogeneous Risk Groups)								
Premium provisions - Total number of homogeneous risk groups	R0350	1	1	1	1	1	1	
Claims provisions - Total number of homogeneous risk groups	R0360	1	1	1	1	1	1	
Cash-flows of the Best estimate of Premium Provisions (Gross)								
Cash out-flows								
Future benefits and claims	R0370	842,429	2,575,647	3,000,078	342,567	17,787,708	4,698,959	29,247,388

Future expenses and other cash-out flows	R0380	534,736	1,127,554	1,294,290	226,577	9,402,841	2,977,925	15,563,923
Cash in-flows								
Future premiums	R0390	1,656,897	3,893,812	4,462,117	681,484	28,932,825	8,140,660	47,767,794
Other cash-in flows (incl. Recoverable from salvages and subrogations)	R0400	0	0	0	0	0	0	0
Cash-flows of the Best estimate of Claims Provisions (Gross)								
Cash out-flows								
Future benefits and claims	R0410	982,207	7,863,270	1,154,393	19,462	17,294,116	8,902,769	36,216,218
Future expenses and other cash-out flows	R0420	39,773	255,548	59,903	1,549	883,793	309,434	1,550,000
Cash in-flows								
Future premiums	R0430	0	0	0	0	0	0	0
Other cash-in flows (incl. Recoverable from salvages and subrogations)	R0440	0	0	0	0	0	0	0
Best estimate subject to transitional of the interest rate	R0460	0	0	0	0	0	0	0
Technical provisions without transitional on interest rate	R0470	0	0	0	0	0	0	0
Best estimate subject to volatility adjustment	R0480	0	0	0	0	0	0	0
Technical provisions without volatility adjustment and without others transitional measures	R0490	0	0	0	0	0	0	0
Expected profits included in future premiums (EPIFP)	R0500	296,625	313,250	334,980	103,082	4,030,219	1,089,228	6,167,383

S.19.01.01 Gross claims paid

		0	1	2	3	4	5	6	7	8	9	10 & +
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110
Prior	R0100											
N-9	R0160	1,947,325	1,223,506	115,992	8,194	43,891	-975	-546	-1,205	-1,425	-1,292	
N-8	R0170	3,769,404	4,049,662	797,684	186,696	83,835	3,341	12,263	-31,453	-2,507	0	
N-7	R0180	4,059,292	2,216,266	305,392	35,700	13,380	93,043	48,370	40,686	0	0	
N-6	R0190	6,898,656	4,226,397	592,473	36,709	6,465	12,442	10,338	0	0	0	
N-5	R0200	8,845,758	4,389,313	703,348	147,548	4,498	18,699	0	0	0	0	
N-4	R0210	8,915,376	6,839,885	1,596,372	663,061	260,179	0	0	0	0	0	
N-3	R0220	8,413,496	5,283,296	1,383,206	837,838	0	0	0	0	0	0	
N-2	R0230	11,132,042	5,806,496	590,148	0	0	0	0	0	0	0	
N-1	R0240	8,233,710	7,237,284	0	0	0	0	0	0	0	0	
N	R0250	9,664,759	0	0	0	0	0	0	0	0	0	

		Current year	Sum of years
		C0170	C0180
Prior	R0100		
N-9	R0160		
N-8	R0170	-1,292	3,333,465
N-7	R0180	-2,507	8,868,925
N-6	R0190	40,686	6,812,127
N-5	R0200	10,338	11,783,480
N-4	R0210	18,699	14,109,163
N-3	R0220	260,179	18,274,874
N-2	R0230	837,838	15,917,835
N-1	R0240	590,148	17,528,686
N	R0250	7,237,284	15,470,995
Total	R0260	9,664,759	9,664,759

S.23.01.01 Own funds

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35						
Ordinary share capital (gross of own shares)	R0010	100,000	100,000		0	
Share premium account related to ordinary share capital	R0030	18,634,000	18,634,000		0	
Initial funds, members' contributions or the equivalent basic own – fund item for mutual and mutual-type undertakings	R0040	0	0		0	
Subordinated mutual member accounts	R0050	0		0	0	0
Surplus funds	R0070	0	0			
Preference shares	R0090	0		0	0	0
Share premium account related to preference shares	R0110	0		0	0	0
Reconciliation reserve	R0130	453,130	453,130			
Subordinated liabilities	R0140	-		0	0	0
An amount equal to the value of net deferred tax assets	R0160	845,372				845,372
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180	0	0	0	0	0
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds						
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220	0				
Deductions						
Deductions for participations in financial and credit institutions	R0230	0	0	0	0	0
Total basic own funds after deductions	R0290	20,032,502	19,187,130	0	0	845,372
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300	0			0	
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310	0			0	
Unpaid and uncalled preference shares callable on demand	R0320	0			0	0
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330	0			0	0
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340	0			0	0
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350	0			0	0
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360	0			0	
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370	0			0	0
Other ancillary own funds	R0390	0			0	0
Total ancillary own funds	R0400	0			0	0
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	20,032,502	19,187,130	0	0	845,372
Total available own funds to meet the MCR	R0510	19,187,130	19,187,130	0	0	
Total eligible own funds to meet the SCR	R0540	20,032,502	19,187,130	0	0	845,372
Total eligible own funds to meet the MCR	R0550	19,187,130	19,187,130	0	0	
SCR	R0580	10,519,560				
MCR	R0600	4,000,000				
Ratio of Eligible own funds to SCR	R0620	190.43%				
Ratio of Eligible own funds to MCR	R0640	479.68%				

S.25.01.01 Solvency Capital Requirement

		Gross solvency capital	Allocation from adjustments due to RFF and Matching adjustments portfolios
		C0110	C0050
Market risk	R0010	1,135,851	0
Counterparty default risk	R0020	1,339,252	0
Life underwriting risk	R0030	0	0
Health underwriting risk	R0040	2,095,18	0
Non-life underwriting risk	R0050	7,317,775	0
Diversification	R0060	-1,537,548	
Intangible asset risk	R0070	0	
Basic Solvency Capital Requirement	R0100	8,464,848	

		Value
		C0100
Operational risk	R0130	2,054,711
Loss-absorbing capacity of technical provisions	R0140	0
Loss-absorbing capacity of deferred taxes	R0150	0
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	0
Solvency Capital Requirement excluding capital add-on	R0200	10,519,560
Capital add-on already set	R0210	0
of which, capital add-ons already set - Article 37 (1) Type a	R0211	0
of which, capital add-ons already set - Article 37 (1) Type b	R0212	0
of which, capital add-ons already set - Article 37 (1) Type c	R0213	0
of which, capital add-ons already set - Article 37 (1) Type d	R0214	0
Solvency capital requirement	R0220	10,519,560
Other information on SCR		
Capital requirement for duration-based equity risk sub-module	R0400	0
Total amount of Notional Solvency Capital Requirements for remaining part	R0410	0
Total amount of Notional Solvency Capital Requirements for ring-fenced funds	R0420	0
Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	R0430	0
Diversification effects due to RFF nSCR aggregation for article 304	R0440	0

S.28.01.01 MCR Calculation

		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	0	0
Income protection insurance and proportional reinsurance	R0030	100,368	329,778
Workers' compensation insurance and proportional reinsurance	R0040	0	0
Motor vehicle liability insurance and proportional reinsurance	R0050	1,047,657	980,803
Other motor insurance and proportional reinsurance	R0060	0	1,343,016
Marine, aviation and transport insurance and proportional reinsurance	R0070	0	115,338
Fire and other damage to property insurance and proportional reinsurance	R0080	3,963,084	9,503,779
General liability insurance and proportional reinsurance	R0090	2,012,397	2,236,511
Credit and suretyship insurance and proportional reinsurance	R0100	0	0
Legal expenses insurance and proportional reinsurance	R0110	0	0
Assistance and proportional reinsurance	R0120	0	0
Miscellaneous financial loss insurance and proportional reinsurance	R0130	0	0
Non-proportional health reinsurance	R0140	0	0
Non-proportional casualty reinsurance	R0150	0	0
Non-proportional marine, aviation and transport reinsurance	R0160	0	0
Non-proportional property reinsurance	R0170	0	0

		Value
		C0070
Linear MCR	R0300	1.924,873
SCR	R0310	10,519,560
MCR cap	R0320	4,733,802
MCR floor	R0330	2,629,890
Combined MCR	R0340	2,629,890
Absolute floor of the MCR	R0350	4,000,000
Minimum Capital Requirement	R0400	4,000,000