

Solvency Financial Condition Report – SFCR 2025

Guardian Group Nederland N.V.

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Summary

Guardian Group Nederland N.V. (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 2024, the premium volume for the entire portfolio was over € 67.7 million, which developed to a level of € 74.7 million in 2025. The year 2025 marks the third full year in which GGNL reports under the license obtained from DNB.

GGNL closed this year with a positive result of € 2.9 million after taxes. The solvency ratio level per ultimo 2025 is 190%, which is well above the statutory required capital of 100% and the internal norm of 150%.

As a result of the positive result for the 2025 fiscal year, GGNL's solid financial position remains unchanged. The equity on a statutory basis amounts to € 27.3 million. The solvency own funds amounts to € 23.2 million and the Solvency capital requirement is € 12.2 million. This results in a solvency ratio of 190%. The internal target solvency ratio 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 December 2025 of GGNL. This report is 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 establishing this report, the regulations and guidelines on this subject as published by DNB are 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

GGNL was established on 26 July 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 26 July 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 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 underwriting capacity, 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 € 74.7 million exclusively through the distribution channel of the authorized agents (AA). More than 35 selected AA's have now been appointed and in 2025 a gross combined ratio of 83% was achieved.

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 key pillar in the business strategy. The 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 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.

The market approach will contribute to our growth objective, which is accompanied by the precondition of ensuring profitability and enabling us to represent the interests of our stakeholders. The product offering of GGNL targets both the private and commercial segments. The (Non-life Solvency II) license was granted by DNB in 2022.

While GGNL offers various products. The primary focus is on the property and liability in commercial lines of business.

Personnel

The Dutch collective labor agreement for insurance companies (CAO Verzekeringsbedrijf) is applicable to GGNL. As of 31 December 2025, GGNL has 10 staff (2024: 10 staff), headquartered in the Rotterdam office, representing 7.98 FTE (2024: 7.82 FTE). In general, employees are employed on a permanent basis and fulltime, with the possibility of staff members holding a temporary contract or parttime employment. GGNL continues to offer a defined contribution pension scheme.

A.2 Results from insurance activities

Financials (compared to 2024)

GGNL achieved a portfolio gross written premium of € 74.7 million, marking a 10% increase compared to the prior year (€ 67.7 million). The Executive Board has taken steps to create a solid foundation for future growth, and carefully reviewing all partnerships, agreements and contract extensions.

Claim costs rose (+13%) mainly due to large claim notifications in the first quarter. The gross combined ratio increased to 83% (+3%), remaining well within targeted levels, and includes all actuarial assumption updates for the year.

Despite challenging financial markets, GGNL benefited from higher investment income (+6%), mainly driven by the yield on investments acquired in 2024 with a longer duration (max. 5 years) against a higher yield, and new additions to the investment portfolio during 2025.

Operational expenses increased overall (+16%), mainly due to the increase in staff and personal cost, consulting cost and expenditure related to improving GGNL's operations and reporting. GGNL's expense in relation to the earned premiums (expense ratio) increased with 0.5%, to 5.5%.

In 2025, profit commissions were again recognized relating to the portfolio. In line with the policy, the Executive Board assessed at two points in time whether profit commissions should be recognized, and subsequently reassessed at year-end to ensure accurate and complete recognition of the amounts.

Net operating profit after tax (NOPAT) for the year reached €2.9 million, a 12% increase (€2.6 million) compared to 2024.

(in euros)	Fire and other damage to property insurance		General liability and other insurance		Total	
	01-01-2025 to 31-12-2025	01-01-2024 to 31-12-2024	01-01-2025 to 31-12-2025	01-01-2024 to 31-12-2024	01-01-2025 to 31-12-2025	01-01-2024 to 31-12-2024
Earned premiums for own account						
Gross written premiums	51,489,113	46,045,190	23,198,203	21,687,266	74,687,316	67,732,456
Reinsurance premiums	(38,590,662)	(36,541,411)	(16,654,679)	(16,681,818)	(55,245,341)	(53,223,229)
	12,898,451	9,503,779	6,543,524	5,005,448	19,441,975	14,509,227
<i>Change in technical provision for unearned premium</i>						
Gross	(440,584)	507,794	88,362	250,129	(352,222)	757,923
Reinsurance	140,895	(601,359)	(222,880)	(339,428)	(81,985)	(940,787)
	(299,689)	(93,565)	(134,518)	(89,299)	(434,207)	(182,864)
	12,598,762	9,410,214	6,409,006	4,916,149	19,007,768	14,326,363
Allocated investment income	199,053	166,220	90,801	78,328	289,854	244,548
Claims for own account						
Gross claims paid	23,520,104	18,656,134	9,481,927	10,840,928	33,002,031	29,497,062
Reinsurance claims	(17,621,964)	(14,951,921)	(7,362,052)	(9,106,174)	(24,984,016)	(24,058,095)
	5,898,140	3,704,213	2,119,875	1,734,754	8,018,015	5,438,967
<i>Change in technical provision for claims</i>						
Gross	836,351	3,082,990	5,246,180	2,073,123	6,082,531	5,156,113
Reinsurance	(169,606)	(1,799,565)	(3,486,624)	(1,144,539)	(3,656,230)	(2,944,104)
	666,745	1,283,425	1,759,556	928,584	2,426,301	2,212,009
	6,564,885	4,987,638	3,879,431	2,663,338	10,444,316	7,650,976
Operational expenses	3,956,229	2,724,172	1,658,374	1,375,807	5,614,603	4,099,979
Result on technical account	2,276,701	1,864,624	962,002	955,332	3,238,703	2,819,956

Table 1. Profit and loss statement realized in 2025 vs. 2024

Investments and expenses

In 2025, GGNL focused on IT investments to enhance automation, data quality, and regulatory compliance. Key efforts included automating finance and compliance & risk management processes, developing financial dashboards, improving data quality via several initiatives conducted by Finance & Control, Underwriting in corporation with data engineers. These initiatives led to an increase in spend (+56%) compared to 2024. GGNL also successfully completed the IT lift-and-shift program and transitioned to a new IT services provider, fully in line with DNB and DORA requirements. The smooth migration strengthened our overall IT resilience and operational stability.

Solvency position (compared to 2024)

GGNL's solvency II (SII) capital requirement is € 12.2 million (€ 10.3 million) and as a result the solvency ratio, including foreseeable dividends, stands at 190% (190%). Due to the increase of the book-of-business, the solvency capital requirement has increased with 26%, mainly due to GGNL's SII non-life risk (-19% SII-ratio impact) and SII counterparty risk (-7% SII-ratio impact). This adverse SCR-ratio impacts, including the effect of the higher retention, are fully absorbed to the increase in net results (+26% SII ratio impact). GGNL recognizes foreseeable dividend. For 2024, the foreseeable dividend was not distributed following a decision by the Supervisory Board - Annual General Meeting. The Minimum Capital Requirement (MCR) equals to 563% (2024: 480%).

Expectations for the year 2026

GGNL's strategy contributed to significantly better gross combined ratio's than the market average. The operational expenses in relation to the earned premiums (expense ratio) did increase (+0.5%), due to higher spend on growing the team and spend on IT and data quality programs. We believe these spending will lead to further operational excellence and contribute to the service we provide to our authorized agents.

Looking ahead, GGNL remains confident in the opportunities within the Dutch and European market to drive sustainable and profitable growth in 2026. The Executive Board reviewed the Budget 2026 – 2028 and included targets for further (European) growth. GGNL is on track to deliver on its ambitions, net results, and the return-on-invested-capital.

We expect to add new authorized agents and increase our portfolio in 2026, while maintaining our targeted combined ratios.

GGNL also aims to maintain strong capital levels and considers planning its annual reinsurance program review. To facilitate this, we will continue to invest in improving data quality and our financial & actuarial reporting.

A.3 Results from investment activities (compared to 2024)

At the end of 2025, the balance for other financial investments and cash equivalents amounted to € 36.4 million (€ 31.4 million).

A total market value of € 30.9 million (€ 24.2 million) is invested in bonds, consisting of € 18.7 million in government bonds (€ 14.9 million) and € 12.2 million in corporate bonds (€ 9.3 million). The remaining € 5.9 million (€ 7.7 million) is held in cash and equivalents.

All investments are maintained with parties rated at least BBB. Investment income for the year amounted to € 0.98 million (€ 0.94 million). The overall yield increased with 14 basepoints to 2.58%. The total percentage of "sustainable" linked bonds is 20.1% of the total portfolio, slightly above the target.

A.4 Results from other activities

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.

A.5 Any other information

No other information.

A. 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 of the Executive Board and the general affairs within GGNL, challenges the Executive Board in respect of strategy and operations, whilst providing guidance. An Audit, Compliance & Risk Committee has been appointed, consisting of several members of the Supervisory Board. The Audit, Compliance & Risk Committee primarily focuses on audit, internal risk management, 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. Plat, CFRO

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.

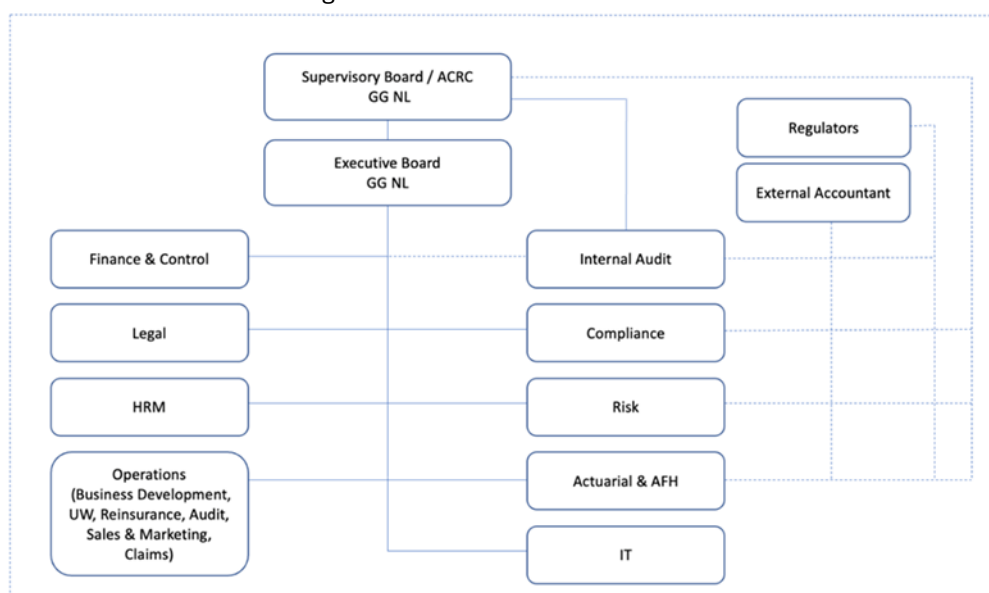


Figure 1. Organizational structure GGNL

The Three Lines model

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

To implement governance in the organization, 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 staff.
2. The second line comprises of the following key functions: Compliance function, Risk management function, and the Actuarial function holder.
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 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 Group Internal audit (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 organization. The GGNL organizational 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 organization, 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 organization of GGNL into account the Internal audit function and the Actuarial function in GGNL are outsourced to external parties.

Remuneration policy, principle

GGNL applies a controlled and sustainable remuneration policy that supports its strategy, risk appetite, values, and long-term objectives. The policy complies with all applicable regulatory requirements and is designed to ensure fair compensation without encouraging undesirable behavior.

The remuneration framework enables GGNL to attract, motivate, and retain qualified employees, including the Executive Board and Supervisory Board, by offering market-competitive packages. In line with the Wet Financieel Toezicht, variable remuneration for Executive Board members remains capped at 20%, and employees may be eligible for a variable component of up to one month's salary. GGNL does not offer any form of share-based compensation.

This approach supports operational excellence, employee engagement, and alignment with industry standards and regulatory expectations.

B.2 Fit and proper requirements

GGNL has established the Risk management function and the Compliance function internally. Both are combined in one full-time equivalent, reporting directly into the CFRO. Both functions do not pose hierarchically responsibilities as those remain with the CFRO.

The Internal audit function and the Actuarial function are outsourced. This approach has been adopted in view of the nature, scale and complexity of the undertaking, the applicable expertise requirements, and the mitigation of key person risk.

The key functions are performed by the following employees and/or external service providers:

- Risk management and Compliance function: Mrs. D. Tosun
- Internal audit function: ForvisMazars N.V.
- Actuarial function : Triple A – Risk Finance Certification B.V.

B.3 Risk management function

The Risk management function is internally assigned and includes the following tasks and responsibilities:

- Monitoring compliance with risk management procedures
- Preparing meetings of the Audit, Compliance & Risk Committee
- Monitoring data integrity
- Reporting to Audit, Compliance & Risk Committee

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.4 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 performs the duties based on an annual Compliance Plan and outlines the planned activities as specifically as possible and is approved by the Executive Board. The Compliance function is internally assigned within GGNL.

B.5 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 IA. 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, Compliance & Risk Committee. From the Executive Board, the CEO is the portfolio holder and thus the point of contact for the HIA.

B.6 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 through an outsourcing agreement. This is appropriate and prudent given the limited size of the GGNL organization combined with the required level of expertise.

B.7 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 GGNL 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 GGNL, 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 GGNL 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 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 GGNL is designed to ensure compliance with the requirements of DNB and DORA.

B.8 Any other information

No other information.

B. Risk profile

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.1 Underwriting 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. GGNL, as a primary insurer, reinsures through a panel of continental reinsurers. Per May 1, 2025 the reinsurance program was renewed.

The underwriting risk profile of GGNL is shown in the table below.

x € 1,000	2025	2024
Premium- and provision risk	5,088	4,335
Lapse risk	901	2,348
Catastrophe risk	5.611	4,432
<i>Diversification</i>	-3,088	3,797
Non-life insurance risk	8,512	7,318
Premium- and provision risk	197	173
Lapse risk	38	119
<i>Diversification</i>	-34	82
Health (similar to non-life) insurance risk	201	210

Table 2. SCR underwriting risk 2025 compared to 2024

C.2 Market 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 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. The tangible assets are shocked as equity risk under Solvency II.

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. Due to diversification in the investment portfolio, concentration risk is minimal for GGNL.

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

x € 1,000	2025	2024
Interest rate risk	936	564
Equity risk*	1	1
Real estate risk	0	0
Spread risk	735	470
Currency risk	0	0
Concentration risk	15	866
<i>Diversification</i>	-496	765
Market risk (SCR)	1,191	1,136

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

[Table 3. SCR market risk 2025 compared to 2024](#)

C.3 Credit 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 2025.

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

x € 1,000	2025	2024
Type 1	1,425	1,095
Type 2	505	306
<i>Diversification</i>	-96	61
Counterparty risk (SCR)	1,834	1,339

[Table 4. SCR counterparty risk 2025 compared to 2024](#)

C.4 Liquidity risk

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

C.5 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 risk

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 risk

GGNL analyzed 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.

C.6 Other material risks

Outsourcing 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.

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 CO₂-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 Any other information

No other information.

C. Valuation for Solvency II purposes

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.

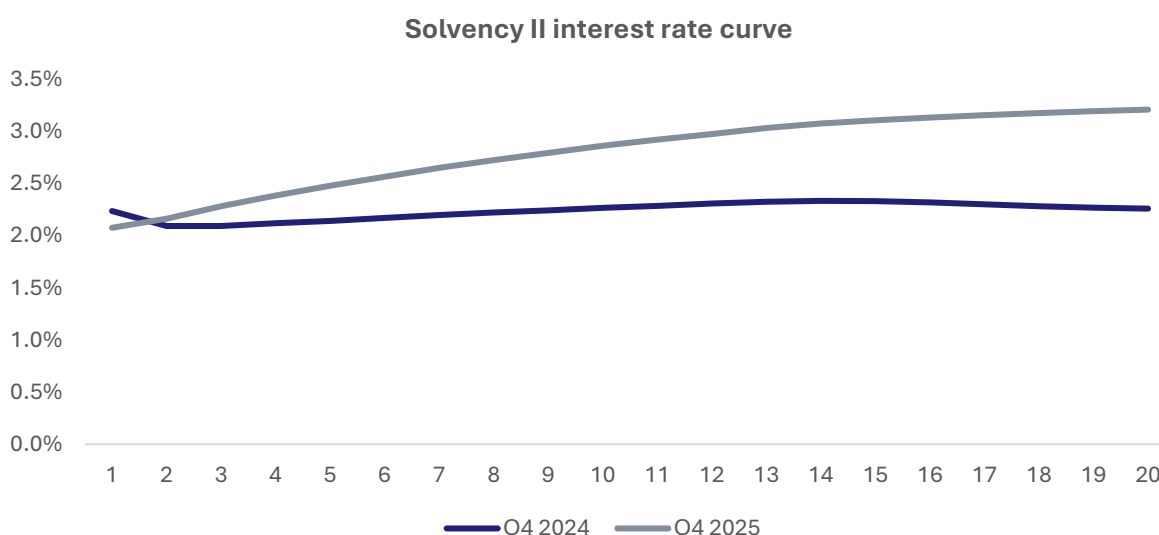


Figure 2. Solvency II interest rate curve 2025 compared to 2024

The current financial statements are compiled in accordance with the principles of Dutch GAAP (BW2:9). The balance sheet as of Q4 2025 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	SII	Liabilities	BW2.9	SII
Goodwill	3,314	0	Own funds	27,303	25,368
			Ordinary share capital	100	100
Deferred tax asset (DTA)	0	682	Share premium	18,634	18,634
			Undistributed profit	8,569	8,569
Property, plant, equipment	1	1	Reconciliation reserve	0	-1,935
Investments	30,461	30,932	Technical provisions	48,896	41,253
Government Bonds	18,711	18,769	Claim provision	41,493	42,334
Corporate Bonds	11,750	12,163	Premium provision	5,047	-3,437
Deposit	0	0	Risk margin	2,355	2,355
Reinsurance recoverables	37,051	29,906	Deferred tax liability (DTL)	0	9
Insurance receivables	3,002	3,002	Payables	4,306	4,306
			Insurance payables	502	502
Cash	5,946	6,050	Reinsurance payables	3,065	3,065
			Trade payables	738	738
Other assets	729	361			
Total assets	80,504	70,935	Total liabilities	80,504	70,935

Table 5. Balance sheet 2025 BW2.9 compared to Solvency II

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

D.1 Assets

Netting of assets and liabilities

Financial assets and liabilities are offset in the balance sheet if GGNL 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.2 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 line of business	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	Health similar to non-life

Table 6. Solvency II line of business classification

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 2025 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 2025 and Q4 2024.

Technical Provisions		Q4 2024	Q4 2025	Difference
Gross	Claim Provisions	36,574	42,334	5,760
Gross	Premium Provisions	-3,804	-3,437	367
Gross	Risk Margin	1,722	2,355	633
Gross	Total	34,492	41,253	6,761
Reinsured	Claim Provisions	29,031	32,471	3,440
Reinsured	Premium Provisions	-3,359	-2,565	794
Reinsured	Risk Margin	0	0	0
Reinsured	Total	25,672	29,906	4,234
Net	Claim Provisions	7,543	9,863	2,320
Net	Premium Provisions	-445	-872	-427
Net	Risk Margin	1,722	2,355	633
Net	Total	8,820	11,347	2,527

[Table 7. Technical provisions 2025 compared to 2024](#)

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 € 41,3 million of which € 42,4 million is allocated to the claims provisions, € -/- 3,4 million is allocated to the premium provisions and € 2,4 million is allocated to the Risk Margin. After reinsurance (after adjustment for expected losses due to counterparty defaults), a total market value provision of € 11,4 million remains, of which € 9,9 million is allocated to the claims provisions, € -/- 872k is allocated to the premium provisions and € 2,4 million is allocated to the Risk Margin.

The gross Solvency II market value of the provisions has increased by € 6,8 million compared to the previous year. The net Solvency II market value of the provisions has increased by € 2,5 million 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.

D. 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	27,303	23,193
Ordinary share capital	100	100
Share premium	18,634	18,634
Undistributed profit	8,569	8,569
Reconciliation reserve	0	-2,617
Foreseeable dividend	0	-2,176
Tier 2 own funds	0	0
Tier 3 own funds	0	682
Deferred tax asset (DTA)	0	682
Total eligible own funds	27,303	23,193

Table 8. Eligible own funds breakdown 2025 BW2.9 compared to Solvency II

Under Solvency II, the balance sheet is based on market valuations. This leads to an eligible own funds of € 23,2 million under Solvency II compared to € 27,3 million 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 2025 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	27,303
Reconciliation goodwill	-3,314
Reconciliation DTA	674
Reconciliation investments	207
Reconciliation technical provisions	5,287
Reconciliation reinsurance	-7,145
Addition risk margin	2,355
Solvency II available own funds	25,368
Foreseeable dividend	-2,176
Solvency II eligible own funds	23,193

Table 9. Own funds 2025 from BW2.9 to Solvency II

Reconciliation of balance sheet items leads to an available own funds under Solvency II of € 25,4 million and an eligible own funds under Solvency II of € 23,2 million. The difference lies in the foreseeable dividend, which is determined as 75% of the 2025 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, 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 2025 based on the standard model of Solvency II. The results are shown below.

Solvency ratio (SCR)	Q4 2025
Eligible own funds	23,193
SCR	12,198
SCR ratio	190%

Solvency ratio (MCR)	Q4 2025
Eligible own funds	22,510
MCR	4,000
MCR ratio	563%

Table 10. SCR and MCR 2025

Per Q4 2025 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 2025
Market risk (total after diversification)	1,191
Interest rate risk	936
Equity risk	1
Spread risk	735
Concentration risk	15
Counterparty default risk (total after diversification)	1,834
Type 1	1,425
Type 2	505
Non-life underwriting risk (total after diversification)	8,512
Premium and reserve risk	5,088
Lapse risk	901
Catastrophe risk	5,611

Health underwriting risk (total after diversification)	201
Premium and reserve risk	197
Lapse risk	38
SCR	12,198
Total bSCR	9.968
Operational risk	2.230
LACDT	0
Eligible own funds	23.193
Tier 1	22.510
Tier 2	0
Tier 3	682
SCR ratio	190%

[Table 11. SCR breakdown 2025](#)

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	18,769	x			
Corporate bonds	12,163	x		x	x
Tangible fixed assets	1		x		x
Total	30,933				

[Table 12. Asset classification SCR market risk 2025](#)

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** (€ 936k): this includes all bonds and deposits with an interest rate sensitive character. This concerns government and corporate bonds with a total value of € 30,9 million .
- **Spread risk** (€ 735k): all corporate bonds are subject to spread risk concerning a value of € 12,2 million .
- **Equity risk** (€ 1k): 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** (€ 15k): 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. Due to the diversification of the investment portfolio, concentration risk is limited.

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 2025. 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 (€ 1,4 million): this refers to a limited number of larger counterparties who possess a credit rating. In the case of GGNL, these include banks and reinsurers.
 - o Banks: liquid assets with a value of € 6,1 million are held at one bank (ING). Based on the credit rating, the corresponding SCR has been determined.
 - o Reinsurers: the receivables from reinsurers, the reinsurance portion of the technical provisions for claims payable and reinsurance premiums paid (together amounting to € 29,9 million) 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.
 - o 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 (€ 505k): these are other counterparties which do not have a credit rating. In the case of GGNL, this concerns the receivables on the balance sheet.
 - o Receivables from direct insurance (including intermediaries) of € 3 million.
 - o Other receivables of € 361k

The counterparty risk of GGNL per Q4 2025 is shown below.

Type 1	Exposure	Capital requirement
Reinsurance	29,906	1,176
Cash	6,050	406
Total type 1 exposure (before diversification)	35,956	1,582
Diversification		157
Total type 1 exposure (after diversification)		1,425

Type 2	Exposure	Capital requirement
Receivables on intermediaries	3,002	450
Receivables (trade, not insurance)	361	54
Total type 1 exposure	3,364	505

Table 13. Counterparty risk breakdown type 1 and type 2 2025

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 € 1,2 million. Liquid assets have a capital requirement of € 406k. The prescribed shock of 15% has been applied to the Type 2 exposure. The total capital requirement for counterparty risk is € 1,9 million 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 (€ 8,5 million)
 - Premium and reserve risk (€ 5,1 million): 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 (€ 901k): this risk is applicable, as the various homogenous risk groups of GGNL are expected to be profitable. As of Q4 2025, lapse risk is based on the expected profits in future premiums (EPIFP) within contract boundaries, together with the expected profit from received but not yet earned premium (unearned premiums). Only personal insurance is taken into account for unearned premiums, as commercial insurance can only be terminated annually, whereas personal insurance can be terminated on a daily basis. 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 and unearned premiums for profitable lines of business only on a net basis.
 - Catastrophe risk (€ 5,6 million): 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. In the table below the catastrophe risks are shown. The reinsurance program of GGNL, has been taken into account. As of Q4 2025, earned premiums from personal liability are excluded from the calculation of man-made liability catastrophe risk.
- Health underwriting risk (€ 201k)
 - Premium and reserve risk (€ 197k): 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 (€ 38k): this risk is applicable, as the homogenous risk group, Accident, of GGNL is expected to be profitable. As of Q4 2025, lapse risk is based on the expected profits in future premiums (EPIFP) within contract boundaries, together with the expected profit from received but not yet earned premium (unearned premiums). Only personal insurance is taken into account for unearned premiums, as commercial insurance can only be terminated annually, whereas personal insurance can be terminated on a daily basis. 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 and unearned premiums for profitable lines of business only on a net basis.

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 € 2,2 million. 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. GGNL does not use the loss absorbing capacity of deferred taxes (LACDT) in determining required solvency per Q4 2025.

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 applies 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. 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 DNB. The key conclusion of the ORSA 2025 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.

Appendix I – QRT's

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	682,027
Pension benefit surplus	R0050	0
Property, plant & equipment held for own use	R0060	1,095
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	30,932,002
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	30,932,002
Government Bonds	R0140	18,768,832
Corporate Bonds	R0150	12,163,169
Structured notes	R0160	0
Collateralised securities	R0170	0
Collective Investments Undertakings	R0180	
Derivatives	R0190	0
Deposits other than cash equivalents	R0200	0
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	29,905,750
Non-life and health similar to non-life	R0280	29,905,750
Non-life excluding health	R0290	29,053,019
Health similar to non-life	R0300	852,731
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	3,002,378
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	6,050,196
Any other assets, not elsewhere shown	R0420	361,458
Total assets	R0500	70,934,906
Liabilities		
Technical provisions - non-life	R0510	41,252,877
Technical provisions - non-life (excluding health)	R0520	40,132,220
Technical provisions calculated as a whole	R0530	0
Best Estimate	R0540	37,846,413
Risk margin	R0550	2,285,807
Technical provisions - health (similar to non-life)	R0560	1,120,657
Technical provisions calculated as a whole	R0570	0
Best Estimate	R0580	1,050,973
Risk margin	R0590	69,684
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	8,077
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	502,313
Reinsurance payables	R0830	3,064,934
Payables (trade, not insurance)	R0840	738,339
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	45,566,539
Excess of assets over liabilities	R1000	25,368,367

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		1,185,721		5,209,314	5,940,065	649,846	74,687,316
Gross - Proportional reinsurance accepted	R0120							
Gross - Non-proportional reinsurance accepted	R0130							
Reinsurers' share	R0140		849,744		3,736,916	4,256,943	468,232	55,245,341
Net	R0200		335,977		1,472,398	1,683,122	181,615	19,441,976
Premiums earned								
Gross - Direct Business	R0210		1,182,188		5,229,072	6,042,486	651,017	74,335,095
Gross - Proportional reinsurance accepted	R0220							
Gross - Non-proportional reinsurance accepted	R0230							
Reinsurers' share	R0240		853,357		3,797,455	4,346,089	471,332	55,327,325
Net	R0300		328,831		1,431,618	1,696,397	179,685	19,007,769
Claims incurred								
Gross - Direct Business	R0310		448,065		5,552,724	2,558,661	174,315	39,084,562
Gross - Proportional reinsurance accepted	R0320							
Gross - Non-proportional reinsurance accepted	R0330							
Reinsurers' share	R0340		344,273		4,260,821	1,787,713	120,439	28,640,246
Net	R0400		103,792		1,291,904	770,949	53,876	10,444,316
Expenses incurred	R0550		89,648		201,585	170,452	42,246	5,141,204
Administrative expenses								
Gross - Direct Business	R0610		6,246		27,625	31,923	3,439	392,716
Gross - Proportional reinsurance accepted	R0620							
Gross - Non-proportional reinsurance accepted	R0630							
Reinsurers' share	R0640							
Net	R0700		6,246		27,625	31,923	3,439	392,716
Investment management expenses								
Gross - Direct Business	R0710		776		3,431	3,965	427	48,779
Gross - Proportional reinsurance accepted	R0720							
Gross - Non-proportional reinsurance accepted	R0730							
Reinsurers' share	R0740							
Net	R0800		776		3,431	3,965	427	48,779
Claims management expenses								
Gross - Direct Business	R0810		3,299		14,593	16,864	1,817	207,457
Gross - Proportional reinsurance accepted	R0820							
Gross - Non-proportional reinsurance accepted	R0830							
Reinsurers' share	R0840							
Net	R0900		3,299		14,593	16,864	1,817	207,457
Acquisition expenses								
Gross - Direct Business	R0910		368,038		1,420,903	1,586,631	194,823	22,585,181
Gross - Proportional reinsurance accepted	R0920							
Gross - Non-proportional reinsurance accepted	R0930							
Reinsurers' share	R0940		331,280		1,453,262	1,686,514	181,703	20,769,661
Net	R1000		36,758		-32,359	-99,883	13,120	1,815,519
Overhead expenses								
Gross - Direct Business	R1010		42,569		188,294	217,584	23,442	2,676,733
Gross - Proportional reinsurance accepted	R1020							
Gross - Non-proportional reinsurance accepted	R1030							
Reinsurers' share	R1040							
Net	R1100		42,569		188,294	217,584	23,442	2,676,733
Balance - other technical expenses/income	R1210							473,400
Total technical expenses	R1300							5,614,604

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	0201,431	037,438	129,109	077,600	02,454,657	0795,025	03,437,044
Gross - direct business	R0070	0201,431	037,438	129,109	077,600	02,454,657	0795,025	03,437,044
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	0130,807	79,178	221,472	048,323	02,095,425	0583,695	02,557,600
Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses	R0110	0130,807	79,178	221,472	048,323	02,095,425	0583,695	02,557,600
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	0130,914	78,507	220,666	048,361	02,100,910	0584,470	02,565,482
Net Best Estimate of Premium Provisions	R0150	070,518	0115,946	091,556	029,238	0353,747	0210,555	0871,561
Claims provisions								
Gross - Total	R0160	1,252,405	10,040,825	1054631,21	80787,81523	18657212,01	11248567,64	42,334,429
Gross - direct business	R0170	1,252,405	10,040,825	1054631,21	80787,81523	18657212,01	11248567,64	42,334,429
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	983,839	8143,265	779,069	54,255	14,142,961	8,374,236	32,477,625
Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses	R0210	983,839	8,143,265	779,069	54,255	14,142,961	8,374,236	32,477,625
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	983,645	8,141,662	778,916	54,245	14,140,177	8,372,587	32,471,233
Net Best Estimate of Claims Provisions	R0250	268,760	1,899,162	275,716	26,543	4,517,035	2,875,980	9,863,197
Total Best estimate - gross	R0260	1,050,973	10,003,386	1,183,741	3,188	16,202,555	10,453,542	38,897,386
Total Best estimate - net	R0270	198,242	1,783,216	184,159	02,695	4,163,288	2,665,425	8,991,635
Risk margin	R0280	69,684	558,672	58,680	4,495	1,038,089	625,871	2,355,491
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	1,120,657	10,562,059	1,242,420	7,683	17,240,644	11,079,414	41,252,877
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	R0330	852,731	8,220,170	999,581	5,884	12,039,267	7,788,117	29,905,750
Technical provisions minus recoverables from reinsurance/SPV and Finite Re- total	R0340	267,925	2,341,889	242,839	1,800	5,201,377	3,291,296	11,347,126
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	457,679	2,699,278	3,306,031	230,744	22,707,247	4,638,505	34,039,483
Future expenses and other cash-out flows	R0380	294,896	1,082,574	1,329,287	148,141	11,860,840	2,775,091	17,490,830
Cash in-flows								
Future premiums	R0390	954,007	3,819,291	4,506,208	456,485	37,022,744	8,208,621	54,967,357
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	1,214,688	9,785,142	1,002,692	76,863	17,956,984	10,952,447	40,988,817
Future expenses and other cash-out flows	R0420	37,717	255,683	51,939	3,925	700,228	296,121	1,345,613
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	1,120,657	10,562,059	1,242,420	7,683	17,240,644	11,079,414	41,252,877
Expected profits included in future premiums (EPIFP)	R0500	258,910	386,564	290,198	98,319	5,288,983	1,204,559	7,527,533

S.19.01.01 Gross claims paid

		0	1	2	3	4	5	6	7	8	9	10	11	12 & +
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130
Prior	R0100													
N-11	R0140	0	0	0	0	0	0	0	0	0	31,218	43,623	10,045	
N-10	R0150	3,761,695	2,019,250	440,015	129,220	149,371	55,961	17,460	129,423	24,243	186,282	-1,504	0	
N-9	R0160	5,721,981	4,701,575	968,902	406,802	245,097	88,501	33,235	-13,023	153,400	959	0	0	
N-8	R0170	6,028,894	3,326,678	869,288	643,157	484,781	581,326	159,169	130,811	58,951	0	0	0	
N-7	R0180	9,380,120	5,500,843	967,958	412,456	323,608	272,470	396,287	17,632	0	0	0	0	
N-6	R0190	13,311,646	6,765,739	1,632,078	571,398	320,641	530,160	490,426	0	0	0	0	0	
N-5	R0200	13,131,651	8,654,568	2,499,556	1,264,853	552,159	290,200	0	0	0	0	0	0	
N-4	R0210	12,466,977	7,319,585	1,982,357	1,327,847	580,859	0	0	0	0	0	0	0	
N-3	R0220	15,263,475	8,428,229	1,337,786	1,152,143	0	0	0	0	0	0	0	0	
N-2	R0230	12,942,405	10,860,152	2,192,489	0	0	0	0	0	0	0	0	0	
N-1	R0240	13,978,555	2,493,307	0	0	0	0	0	0	0	0	0	0	
N	R0250	15,716,525	0	0	0	0	0	0	0	0	0	0	0	

		Current year	Sum of years
		C0170	C0180
Prior	R0100	0	0
N-11	R0140	10,045	84,886
N-10	R0150	-1,504	6,911,415
N-9	R0160	959	12,307,429
N-8	R0170	58,951	12,283,055
N-7	R0180	17,632	17,271,373
N-6	R0190	490,426	23,622,090
N-5	R0200	290,200	26,392,988
N-4	R0210	580,859	23,677,624
N-3	R0220	1,152,143	26,181,634
N-2	R0230	2,192,489	25,995,046
N-1	R0240	12,493,307	26,471,862
N	R0250	15,716,525	15,716,525
Total	R0260	10,045	84,886

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	3,776,489	3,776,489			
Subordinated liabilities	R0140	0		0	0	0
An amount equal to the value of net deferred tax assets	R0160	682,027				682,027
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	23,192,516	22,510,489	0	0	682,027
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	
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	23,192,516	22,510,489	0	0	682,027
Total available own funds to meet the MCR	R0510	22,510,489	22,510,489	0	0	
Total eligible own funds to meet the SCR	R0540	23,192,516	22,510,489	0	0	682,027
Total eligible own funds to meet the MCR	R0550	22,510,489	22,510,489	0	0	
SCR	R0580	12,197,567				
MCR	R0600	4,000,000				
Ratio of Eligible own funds to SCR	R0620	190%				
Ratio of Eligible own funds to MCR	R0640	563%				

S.25.01.01 Solvency Capital Requirement

	Gross solvency capital	Allocation from adjustments due to RFF and Matching
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			adjustments portfolios
		C0110	C0050
Market risk	R0010	1,190,621	0
Counterparty default risk	R0020	1,833,789	0
Life underwriting risk	R0030	0	0
Health underwriting risk	R0040	200,741	0
Non-life underwriting risk	R0050	8,512,247	0
Diversification	R0060	-1,769,884	
Intangible asset risk	R0070	0	
Basic Solvency Capital Requirement	R0100	9,967,514	

		Value
		C0100
Operational risk	R0130	2,230,053
Loss-absorbing capacity of technical provisions	R0140	0
Loss-absorbing capacity of deferred taxes	R0150	
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	12,197,567
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	12,197,567
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	198,242	335,977
Workers' compensation insurance and proportional reinsurance	R0040	0	0
Motor vehicle liability insurance and proportional reinsurance	R0050	1,783,217	1,472,398
Other motor insurance and proportional reinsurance	R0060	184,159	1,683,122
Marine, aviation and transport insurance and proportional reinsurance	R0070	0	181,615
Fire and other damage to property insurance and proportional reinsurance	R0080	4,163,288	12,898,452
General liability insurance and proportional reinsurance	R0090	2,665,425	2,870,413
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	2,519,274
SCR	R0310	12,197,567
MCR cap	R0320	5,488,908
MCR floor	R0330	3,049,392
Combined MCR	R0340	3,049,392
Absolute floor of the MCR	R0350	4,000,000
Minimum Capital Requirement	R0400	4,000,000