

**Solvency and Financial  
Conditions Report (SFCR)**

**ERGO**

**ERGO Insurance SE  
Financial Year 2017**

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## Summary

ERGO Insurance SE is presenting the Solvency and Financial Condition Report (SFCR) for the second time. This report is part of the qualitative (narrative) reporting system that insurance companies must prepare in the course of Solvency II. The report on Solvency and Financial Position is open to the public and is published annually. Its content structure and the information to be reported are laid down in supervisory law, for example in Commission Delegate's Regulation (EU) 2015/35 of 10 October 2014.

This report relates to the 2017 financial year.

As one of the Baltic's leading insurance companies ERGO Insurance SE offers a comprehensive selection of property and casualty insurance products to both private and corporate clients. In 2017, ERGO Insurance SE generated premium income of 166,9 million euros, a 22% increase on the year before. The largest classes were motor third party liability insurance and motor vehicle insurance. In connection with the merger with D.A.S. Õigusabikulude Kindlustuse AS, the portfolio was supplemented with a new product class: legal expenses insurance. In 2017 ERGO and D.A.S. Õigusabikulude Kindlustuse AS have signed a merge agreement. Both ERGO and DAS belong to the group of ERGO Group AG (ERGO group). The purpose of the merger was to optimize capital investments into the group's Baltic P&C insurance companies and to simplify the legal and financial structure. One of the main forces of the transaction was addition of legal protection insurance to the wide range of ERGO Estonian companies' insurance coverage including P&C, Life and Health already (chapter A Business and Performance).

Solvency II provides insurance companies with numerous guidelines for their governance system. Our company has continued to develop its extensive and appropriate governance system. In this respect, it has paid particular attention to the reliability and suitability of the persons managing the company ("fit and proper") as well as to the appropriate control of the outsourced functions. The four key functions, which we report in detail (Chapter B Governance System), have a particularly important role. In 2017 the company initiated the review of its governance system and concluded that amendments into the system, organization and structures are needed. Based on the conclusions, changes to the company's governance system will be implemented during year 2018, including changes in Management Board.

Our company is always in a position to manage the risks involved. This is demonstrated by the implementation of sound risk management. In 2017 ERGO has elaborated a system of Key Risk Indicators that ensures early recognition of risks and prepares proposals for suitable countermeasures. (chapter C Risk Profile).

Solvency II creates new rules for the accounting of assets, actuarial provisions and other liabilities. We explain the main differences in the accounting according to Solvency II and IFRS, including their bases, methods and underlying assumptions. Our valuation method has not changed in the past financial year (chapter D Valuation for solvency purposes).

Our company is adequately capitalized and in the reporting year has met the requirements for the provision of solvency capital and minimum capital at all times (Chapter E Capital Management).

The qualitative reporting system supplements the quantitative (number-based) reporting. Quantitative Reporting Templates (QRT), which insurance companies must regularly transfer

the supervisory authority, are part of the quantitative reporting system. The report contains selected QRTs with information on the 2017 financial year.

**This Solvency and Financial Condition Report for financial year 2017 was approved by the Management Board of ERGO Insurance on 26.04.2018.**

## A. Business and Performance

### A.1 Business

ERGO Insurance SE, Tallinn, hereinafter referred also as ERGO or the Company, is operated in the legal form of *societas Europaea*, a public company registered in accordance with the corporate law of the European Union. ERGO is operating in the Baltic countries, with the headquarters in Estonia and branches in Latvia and Lithuania.

The Company is 100% owned by ERGO International AG, Germany, which is part of the ERGO Group AG, Germany, which in turn is part of the Munich Re Group (Münchener Rückversicherungs-Gesellschaft AG, Munich). ERGO Group is one of the major insurance groups in Germany and Europe, offering a comprehensive spectrum of insurance services.

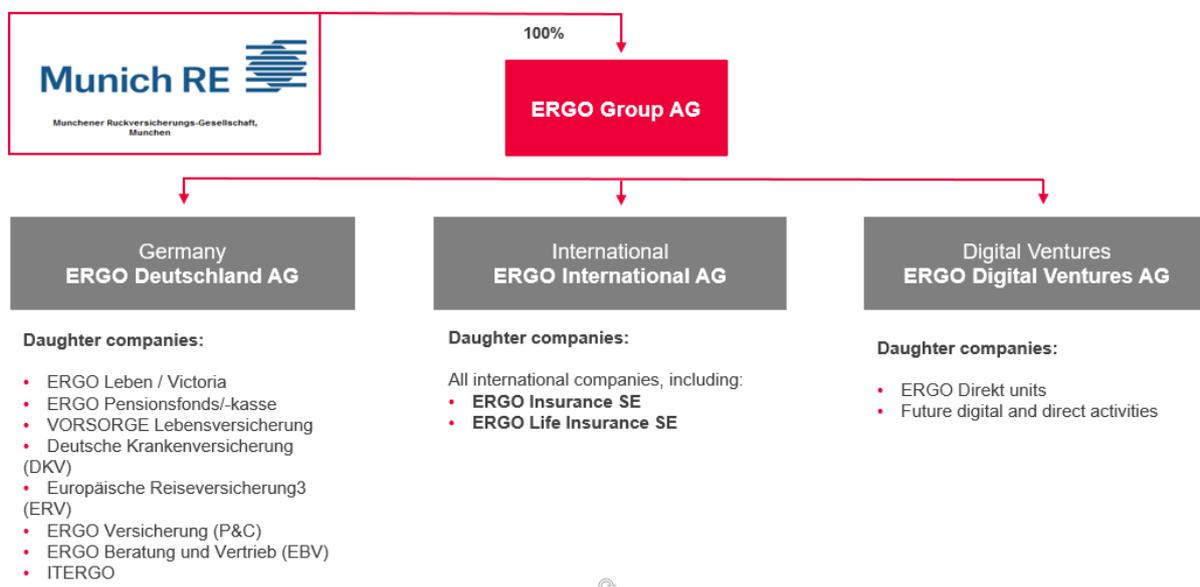


Figure 1. ERGO Group Structure

As one of the Baltic's leading insurance companies ERGO offers a comprehensive selection of property and casualty insurance products to both private and corporate clients. ERGO's gross premium income for 2017 was 166,9 million euros. In terms of premium income, ERGO maintained the second position in the Estonian and the third position in the Baltic non-life insurance market. ERGO operates with a multi distribution channel approach and can rely on an own extensive and country wide sales network. ERGO underwrites business mainly in Estonia, Latvia and Lithuania.

ERGO's material lines of business:

- Medical expense insurance
- Income protection insurance
- Motor vehicle liability insurance
- Other motor insurance
- Marine, aviation and transport insurance
- Fire and other damage to property insurance
- General liability insurance
- Credit and suretyship insurance
- Assistance

- Miscellaneous financial loss
- Legal Protection Insurance

On 14th of June 2017 ERGO and D.A.S. Õigusabikulude Kindlustuse AS (hereinafter – DAS) have signed a merge agreement. Both ERGO and DAS belong to the group of ERGO Group AG (ERGO group).

After having received the permission from Estonian Financial Supervision Authority, the merge took place on 28 September 2017. As from that date all assets, rights and liabilities of the DAS (including insurance contracts) were transferred to ERGO as acquiring company. For accounting purposes, transactions of Merging Company DAS were undertaken by the ERGO from 1 January 2017 (merger balance sheet date). The purpose of the merger was to optimize capital investments into the group's Baltic P&C insurance companies and to simplify the legal and financial structure. The simplification of the structure has started with the establishment of ERGO in the form of European company (SE) and the merger of legal protection insurance activities to the existing pan-Baltic organization is the logical continuation of the process. One of the main forces of the transaction is addition of legal protection insurance to the wide range of ERGO Estonian companies' insurance coverage including P&C, Life and Health already. Also the compliance with Solvency II is very important to ERGO group.

In addition, on 18 September 2017 ERGO established a subsidiary, DEAX Õigusbüroo OÜ, whose core business is the provision of legal protection insurance claims handling services.

Besides the merger with DAS, there have not been any other significant business or other events over the reporting period that have a material impact on ERGO.

The responsible supervisory authority for the company is Estonian Financial Supervision Authority, (Finantsinspektsioon), Sakala 4, 15030 Tallinn, Estonia. The company is audited by KPMG Baltics OÜ, Narva mnt 5, Tallinn, Estonia.

The responsible supervisory authority for the Munich Re and ERGO Groups is the Federal Financial Supervisory Authority (Bundesanstalt für Finanzdienstleistungsaufsicht, BaFin), Graurheindorfer Str. 108, 53117 Bonn.

ERGO Insurance SE has participations in:

- CJSC ERGO Ins. Co, Closed Joint Stock Company, Belarus, share of participation 34,9971%.
- DEAX Õigusbüroo OÜ, private limited company, Estonia, share of participation 100%.

## A.2 Underwriting Performance

In 2017, ERGO generated premium income of 166.9 million euros, a 22.0% increase on 2016. The largest classes were motor third party liability (hereafter 'motor liability') insurance and comprehensive motor vehicle (hereafter 'motor own damage') insurance, which generated premium income of 66.1 million euros and 43.8 million euros, accounting for 39.6% and 26.3% of the total portfolio, respectively. Individuals' property insurance contributed 11.4 million euros, i.e. 6.8% and legal persons' property insurance 9.8 million euros, i.e. 5.9%. Premiums written in accident insurance and liability insurance totalled 6.5 million euros and 6.1 million euros respectively and their respective contributions were 3.9% and 3.6%. The total contribution of other insurance classes, which each accounted for less than 3.5%, was 23.1 million euros, i.e. 13.9%.

Compared with 2016, the share of motor liability insurance increased by 4.3 percentage points and its premium income grew by 17.7 million euros, i.e. 36.7%. In addition to motor liability insurance, rapid growth was achieved in motor own damage insurance and technical risks insurance where premium income grew by 13.8% and 20.7%, i.e. 5.3 million euros and 0.9 million euros, respectively. In connection with the merger with DAS, the portfolio was supplemented with a new product class: legal expenses insurance.

Gross premium income by line of business:

In euros	2017		2016		Change	
	Gross written premiums	Share of class, %	Gross written premiums	Share of class, %	Gross written premiums	Share of class, pp
Medical expense insurance	3 934 965	2,4%	3 472 613	2,5%	462 352	-0,2%
Income protection insurance	6 469 901	3,9%	5 811 753	4,2%	658 148	-0,4%
Motor vehicle liability insurance	68 846 485	41,3%	51 166 421	37,4%	17 680 064	3,8%
Other motor insurance	45 035 214	27,0%	39 840 747	29,1%	5 194 467	-2,1%
Marine, aviation and transport insurance	1 987 064	1,2%	1 956 574	1,4%	30 490	-0,2%
Fire and other damage to property insurance	28 563 928	17,1%	25 828 692	18,9%	2 735 236	-1,8%
General liability insurance	6 081 685	3,6%	5 449 863	4,0%	631 822	-0,3%
Credit and suretyship insurance	2 166 732	1,3%	1 752 458	1,3%	414 274	0,0%
Legal expenses insurance	2 101 407	1,3%	0	0,0%	2 101 407	1,3%
Assistance	1 664 124	1,0%	1 537 650	1,1%	126 474	-0,1%
Miscellaneous financial loss	33 116	0,0%	17 886	0,0%	15 230	0,0%
<b>Total from insurance activities</b>	<b>166 884 620</b>	<b>100,0%</b>	<b>136 834 657</b>	<b>100,0%</b>	<b>30 049 963</b>	<b>0,0%</b>
Non-proportional health reinsurance	0	0,0%	3 412	0,0%	-3 412	0,0%
Non-proportional property reinsurance	0	0,0%	-61 040	0,0%	61 040	0,0%
<b>Total from reinsurance activities</b>	<b>0</b>	<b>0,0%</b>	<b>-57 628</b>	<b>0,0%</b>	<b>57 628</b>	<b>0,0%</b>
<b>Total</b>	<b>166 884 620</b>	<b>100,0%</b>	<b>136 777 029</b>	<b>100,0%</b>	<b>30 107 591</b>	

Gross Premium Income by countries:

In euros	2017	2016
Estonia	57 422 607	49 992 835
Latvia	30 017 728	25 552 523
Lithuania	79 444 285	61 289 299
<b>Total from insurance activities</b>	<b>166 884 620</b>	<b>136 834 657</b>
Estonia		3 412
Romania	0	-61 040
<b>Total from reinsurance activities</b>	<b>0</b>	<b>-57 628</b>
<b>Total</b>	<b>166 884 620</b>	<b>136 777 029</b>

### A.3 Investment Performance

Strategic investment management is the responsibility of the company's asset and liability management committee which includes highly qualified specialists from Estonia and Germany. In line with the investment management system, tactical investment management is outsourced to an external service provider, the group's asset management company MEAG

(MEAG Munich ERGO Asset Management GmbH), which delivers the service in accordance with the strategic investment management plan and risk profile approved by the management board of ERGO.

In 2017, ERGO maintained a conservative approach to debt securities' interest rate and credit risk. The credit risk profile of the debt securities portfolio was as follows: 54.7% (2016: 54.5%) had an AAA (by Standard & Poor's) or Aaa (by Moody's) credit rating, 14.1% (2016: 21.2%) were rated AA or Aa, 16.2% (2016: 12.8%) had an A rating and 14.9% (2016: 11.5%) were rated BBB or Baa.

At the year-end, investments consisted of investments in associates of 2.5 million euros (2016: 1.86 million euros), debt securities of 121.7 million euros (2016: 107.3 million euros), loans of 1.4 million euros (2016: 1.4 million euros), and equities and fund units of 17.9 million euros (2016: 12.7 million euros). There were no investments in term deposits.

Income on assets with interest rate risk amounted to 0.57 million euros (2016: 0.67 million euros). Realisation of equities and fund units resulted in a gain of nil euros (2016: 1.13 million euros) and realisation of debt securities produced a gain of 0.1 million euros (2016: 0.2 million euros). Dividend income amounted to 0.21 million euros (2016: 0.31 million euros). The fair value reserve decreased by 0.5 million euros (2016: 1.2 million euros). Thus, the overall yield of the investment portfolio was 0.26% (2016: 2.46%). Investment management expenses accounted for 0.27% of the carrying value of managed investments.

ERGO does not have any investments in securitisation.

### Gains and losses recognised directly in equity

The fair value reserve comprises the net change in the fair value of available-for-sale financial assets. When a financial asset is derecognised, the cumulative gain or loss previously recognised in equity is recognised in profit or loss.

<i>In euros</i>	2017	2016
<b>At 1 January</b>	<b>1 753 440</b>	<b>2 929 554</b>
Derecognised from equity and recognised in profit or loss in connection with sale and impairment	-56 300	-1 540 237
Derecognised from equity and recognised in profit or loss in connection with arrival of maturity date	-32	401
Net change in fair value recognised in other comprehensive income or expense during the year	-465 428	363 722
<b>At 31 December</b>	<b>1 231 680</b>	<b>1 753 440</b>

### A.4 Performance of other activities

Other income contains fees, commissions and charges received; insurance brokerage income; income from currency revaluation; rental income and other income not related to insurance activities. Observed increase of other income in the year 2017 is mostly caused by gains received on disposal of real estate and income from received receivables, written off in the previous periods.

Other expenses contain membership fees to Financial Supervision Authority and professional associations; audit and legal fees; expenses related to currency revaluation; insurance brokerage expenses; write-off and other expenses not related to insurance activities. Observed increase of other expenses in the year 2017 is mostly caused by occurred write-off of intangible assets and increased expenses from currency revaluation.

<i>In euros</i>	2017				2016			
<b>Other activities</b>	<b>Estonia</b>	<b>Latvia</b>	<b>Lithuania</b>	<b>Total</b>	<b>Estonia</b>	<b>Latvia</b>	<b>Lithuania</b>	<b>Total</b>
Other income	676 059	240 890	1 260 171	<b>2 177 120</b>	823 787	261 201	700 050	<b>1 785 038</b>
Other expenses	2 472 398	209 212	624 616	<b>3 306 226</b>	835 148	157 545	272 442	<b>1 265 135</b>
<b>Total result</b>	<b>-1 796 339</b>	<b>31 678</b>	<b>635 555</b>	<b>-1 129 106</b>	<b>-11 361</b>	<b>103 656</b>	<b>427 608</b>	<b>519 903</b>

### A.5 Any other information

There is no any other information.

## **B. System of Governance**

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

From 18<sup>th</sup> of May 2016 ERGO has in force an updated System of Governance document (version 2). This document describes the whole governance system and main processes in ERGO that enables to oversee and control activities of the company.

No material changes in the system of governance have taken place over the year 2017.

As the main registered office of ERGO is in Estonia, the company must comply with European Union laws (e. g. Solvency II directive), Estonian Insurance Activity Act as well as Estonian Commercial Code and relevant regulations, approved by Estonian Financial Supervisory Authority (Finantsinspektsioon).

ERGO has organisational and operational structures aimed at supporting the strategic objectives and operations. Structures will be adapted to changes in the strategic objectives, operations or in the business environment. The organisational and operational structure of ERGO is considered appropriate for the complexity and size of operations and the business strategy.

ERGO has following management bodies:

- **General meeting of shareholders**
- **Supervisory Board** (consists of 4 members, elected for a term of 3 years)
- **Management Board** (consists of 5 members, elected for a term of 5 years)
- **Committees** (ALM committee, AL-Team, Business Continuity committee, Fit & Proper Committee, Internal Audit committee, etc.)

#### **B.1.1 Management Board**

##### **Duties and responsibilities**

The Company is managed by the Management Board. The Management Board is responsible for managing the Company, setting objectives and determining strategy. In doing so, it is obliged to safeguard Company interests and endeavour to achieve a long-term increase in the Company's value. The Management Board must ensure compliance with statutory requirements and internal company directives, and is responsible for effecting adequate risk management and risk control in the Company.

Management Board is acting in accordance with Rules of Procedure of the Management Board of ERGO.

The Management Board constitutes a council from the Management Board members, to whom the business management has been assigned. Duties are properly allocated between Management Board members, taking also into account the aim to avoid conflict of interest. The performance of its activities requires a sufficient presence in the company.

The Management Board members are elected by the Supervisory Board. The Chairman of the Management Board is appointed by the Supervisory Board. According to Rules of Procedure

of the Management Board Each Management Board member has its own area of responsibility (internal allocation of tasks).

The branches of the company are managed by the branch managers. Branch manager is one of the Management Board Members. The branch managers are appointed by the Management Board. All terms applicable for Management Board Members according to the current procedure are applicable for Branch Managers also.

Member of the Management Board Mr Deniss Sazonovs submitted a notification of the intention to be resigned from the office from 1st April 2017. In relation with that Supervisory Board has revoked him from the Management Board from 1st April 2017.

Until the appointment of the new CFO the roles and responsibilities of the CFO from 01.04.2017 were temporarily reorganized as follows:

- Chairman of the Management Board Kęstutis Bagdonavičius was appointed as responsible for IT.
- Member of the Management Board and ERGO's COO in Estonia Tarmo Koll has taken over the CFO functions and in addition to the COO responsibilities is responsible for financial management and the following additional departments: accounting, planning and controlling, actuarial and risk management.

The possible conflicts of interest arising from the COO in Estonia being responsible for both Underwriting performance and Risk Management have been acknowledged and temporarily accepted by the Supervisory Board taking into account that this is temporary solution and the following measures have been taken to minimize the risk: Risk Management reports to the whole Board and has a dotted reporting line to the ERGO Group CRO.

In 22.12.2017 the Supervisory Board of ERGO Insurance SE has decided to appoint Bogdan Benczak as a new Management Board member. In relation with that also the allocation of tasks between Management Board members was rearranged. Internally Bogdan Benczak was appointed as for IT and Information Security area.

Management Board members as at the end of 2017 were:

- Kęstutis Bagdonavičius – Chairman of the Management Board
- Ingrida Kirse – Management Board member
- Tarmo Koll – Management Board member
- Saulius Jokubaitis – Management Board member
- Bogdan Benczak – Management Board member.

The roles and responsibilities of the members of the Management Board until 31.12.2017 were as follows:

- Chairman of the Management Board Kęstutis Bagdonavičius is responsible for the following departments: communication, corporate strategy, HR and office administration, legal and compliance, regional development, business organization and innovation.

- Member of the Management Board and ERGO's COO in Latvia Ingrida Kirse is responsible for life, health and pension insurance in the Baltics as well as property & casualty insurance, claims handling, sales and marketing in Latvia.
- Member of the Management Board and ERGO's COO in Lithuania Saulius Jokubaitis is responsible for reinsurance and pricing in the Baltics and property & casualty insurance, claims handling, sales and marketing in Lithuania.
- Member of the Management Board and ERGO's COO in Estonia Tarmo Koll is responsible for bank insurance in the Baltics and property & casualty insurance, claims handling, sales and marketing and customer contract management in Estonia, accounting, planning and controlling, actuarial, risk management.
- Member of the Management Board and ERGO's CTO in Bogdan Benczak is responsible for IT and Information Security.

### **Internal regulation, working procedure and delegation of tasks**

Members of the Management Board work together in a spirit of collegiality and inform each other of all business procedures of particular significance within the responsibility of a member of the Management Board, and of such business procedures which affect, or may affect, the responsibility of another member of the Management Board.

In view of the requirement of a consistent business management the Management Board members (including Branch Managers of Company's Branches) conduct their business area independently and on their own responsibility. Any matters of fundamental importance have to be presented to the Management Board for information and/or deciding. Any matters having impact on another business area have to be decided between the responsible members of the Management Board. In case if the Management Board members are of contrary opinions, final decision shall be taken by the CEO solely.

In order to ensure the necessary coordination, the matters to be discussed and/or decided by the Management Board are discussed regularly during the Management Board meetings. These are called by the Chairman of the Management Board according to the annual plan.

Management Board has also established internal signature rights for signing insurance contracts and for disbursement of claims.

There are also special decrees on determining signature rights of executives on concluding agreements for goods and services and approving invoices.

### **B.1.2 Supervisory Board**

#### **Duties and responsibilities**

The Supervisory Board plans the activities of the Company, organises the management of the company, elects and recalls Management Board members and supervises the activities of the

Management Board. Certain transactions require its approval, but it is not authorised to take management action in place of the Management Board.

The members of the Supervisory Board shall be elected and removed by the General Meeting of the Shareholders. In order to elect a member of the Supervisory Board, his or her written consent is required.

A Member of the Supervisory Board may be paid remuneration in accordance with their tasks and the financial situation of the Company, the amount of and procedure for payment of which is determined by a resolution of the general meeting.

Members of the Supervisory Board are obliged to act in the Company's interest and when making decisions may neither pursue personal interests nor make use of the Company's business opportunities for their own purposes.

All Company business activities beyond the usual framework of daily business require the previous approval of the Supervisory Board. Exact requirements are established by the rules of procedure of the Management Board.

The Chairman of the Supervisory Board, their deputies have to be elected in a constituent assembly that follows the general meeting, in which the Supervisory Board members that have to be elected by the general meeting have been elected.

Meetings of the Supervisory Board shall be held when necessary but not less frequently than once every three months. The Chairman summons the meeting of the Supervisory Board.

According to Shareholders decision (taken on 16 of August 2017), from 1 September 2017, the following Members of the Supervisory Board of ERGO were revoked from the Supervisory Board prior to the expiry of the term of office:

- Thomas Hans Schirmer,
- Thomas Schöllkopf,

Effective from 1 September 2017, the following new members of the Supervisory Board were appointed with the term of office till 01.09.2020:

- Piotr Sliwicki,
- Carsten Keune,
- Grzegorz Szatkowski,

Therefore as from 1 September 2017 the members of the Supervisory Board are:

- Piotr Maria Sliwicki – Chairman of the Supervisory Board
- Malgorzata Makulska – member of the Supervisory Board
- Grzegorz Szatkowski – member of the Supervisory Board
- Carsten Keune – member of the Supervisory Board

The Supervisory Board has established its own rules of procedure, specifying responsibilities, work processes and required majorities. It has also adopted separate charter for the Audit Committee.

### **B.1.3 Key functions**

In accordance to Solvency II Directive, ERGO has in place the following **four key functions**:

- Actuarial function
- Compliance function
- Internal audit function
- Risk Management function

Key functions are incorporated into the organisational structure in a way which ensures that each function is free from influences that may compromise the function's ability to undertake its duties in an objective, fair and independent manner. All key functions also satisfy a range of requirements, such as fulfilling the “fit and proper” requirements, comply with certain reporting and remuneration requirements.

#### **Actuarial function**

Within the scope of the tasks as per Solvency II, the Actuarial Function performs monitoring tasks in the actuarial field as the 2<sup>nd</sup> line of defence. Focal points are the coordination of the calculation of technical provisions, monitoring tasks are related to the underwriting policy as well as the use of reinsurance. The Actuarial Function also supports the Risk Management Function.

The role of the Actuary Function in ERGO is to measure, manage, and mitigate risks by using statistical models and analysis to enhance the understanding of risks assumed. Actuaries also provide advice on the adequacy of risk assessment, reinsurance arrangements, investment policies, capital levels and stress testing of the future financial condition of these companies. The Appointed actuary is the holder of the actuarial function in ERGO. Please see chapter B6 for details.

#### **Compliance function**

The Compliance Function includes advising the administrative, management or supervisory body on compliance with the laws, regulations and administrative provisions adopted pursuant to Solvency II directive. It also includes the assessment of the possible impact of any changes in the legal environment on the operations of the undertaking concerned and the identification and assessment of compliance risk. Please see chapter B.4.2 for details.

#### **Internal Audit**

The Internal Audit Function is provided by local auditors in Estonia, Latvia and Lithuania. The Internal Audit Function performs assigned audits independently, objectively and under its own responsibility.

The Internal Audit Function provides independent, objective assurance and consulting services designed to add value and improve the effectiveness of risk management, control and governance processes. The Internal Audit Function supports ERGO Supervisory Board and ERGO Management Board in performing its monitoring tasks and is responsible in particular for checking the internal governance system, including the risk management system, internal control system and the other Solvency II key functions (compliance, risk management and actuarial function). Please see chapter B5 for details.

### **Risk Management function**

The Risk Management Function is an integral part of ERGO's corporate management with regard to achieving the goal of turning risk into value. The Risk Management Function is the main operating unit responsible for implementing the risk management system. Its main purpose is to assist ERGO Management Board to effectively implement a risk management system and integrate it into business operations. In this respect, the risk management system is understood as meaning the entirety of all measures, on an individual or aggregate basis, serving the regular identification, assessment, monitoring and management of risks taken or potential risks as well as reporting on these. Please see chapter B.3.2 for details.

#### **B.1.4 Remuneration policy**

ERGO Remuneration policy sets the transparent and common remuneration system that facilitates the implementation of Company strategy. The coherent and transparent remuneration system allows proper evaluation of each employee's contribution according to the achieved results.

The bases and principles of determining the remuneration and other office related benefits of employees, shall:

- be clear, transparent and in compliance with prudent and efficient risk management principles;
- be based on the business strategy and values of the insurance undertaking, taking into consideration the economic performance of the insurance undertaking and the legitimate interests of the policyholders, insured persons and beneficiaries;
- take into consideration the long-term objectives of the insurance undertaking in view of its ability to cope with the changes in the external environment.

#### **General remuneration principles**

Based upon the legal framework and regulations as well as best human resources practices, the most important principles of the policy are:

- remuneration policy is in line with the achievement of objectives defined in the Company strategy; in the event of changes of the strategy, the remuneration system structure shall be reviewed and if necessary, amended;
- remuneration policy shall help to avoid negative incentives, especially conflicts of interest, as remuneration will be paid strictly according to this policy;
- remuneration system comprises a fixed component and a variable component, both of which must stand in an appropriate relationship to one another;
- remuneration policy shall ensure internal fairness and external competitiveness;

- employees are offered a competitive and market aligned remuneration package;
- every position is evaluated to determine both its relative internal value and external value based on written position description – job profile.

### **Principles of remuneration of Management Board members**

Exact conditions of the remuneration of Management Board members are set by the Shareholder's authorised person and are reflected in the individual Management Agreement of each Member of the Management Board.

The remuneration shall not be considered as a wage or any other similar payment, which could be connected with the Management Board Member's subordination to the Company or depending solely on the profit (loss) earned by the Company.

Where the Management Board Member occupies Other Positions on the basis of employment agreement, the Management Board Member shall receive due remuneration for the performed work pursuant to the procedure and conditions specified in a respective employment contract.

### **Job grading**

All job positions within the Company are classified. The basis for classifying a position is the corresponding job evaluation based on Hay Method. The Hay Method is an analytic method to evaluate job requirements by means of defined evaluation criteria. As is always the case with Hay Method, the approach is job and not person related.

### **Total Compensation approach**

ERGO applies a total compensation approach. The total remuneration contains not only fixed components, but also variable remuneration. Remunerations ranges are assigned to the grades and subgrades. Each remuneration range has fixed and variable components. These remuneration ranges are checked every two years whether to reflect current market situation.

### **Basic remuneration**

The basic remuneration is determined on the basis of the role, position and respective salary range, including professional experience, responsibility, job complexity, local market conditions. It is paid monthly or twice per month according to local legislation.

Management Board Member receives as a remuneration for his/her activities as a Management Board Member an annual gross salary set forth in the individual Management Agreement (incl. vacation period). The annual gross salary is divided into 12 monthly instalments to be paid in accordance with the national laws.

Where the Management Board Member occupies other positions on the basis of employment agreement and receives a salary under such employment agreement, the overall fixed remuneration payable to the Management Board Member as referred to herein shall cover the salary payable under the employment agreement, so that in any case the overall fixed salary to be paid to the Management Board Member does not exceed the annual gross salary set forth in the Management Agreement.

### **Variable remuneration**

The variable remuneration component must reflect overall business performance of the Company. The variable remuneration motivates and rewards high performers who significantly

contribute to sustainable results, perform according to set expectations for the individual in question, strengthen long-term stakeholder's relations, and generate profitable income and shareholder value within Company.

According to the positions' direct influence to company results, percentage of variable remuneration can differ – depending on whether it is business or support function.

The annual variable remuneration calculation is based on Company's annual targets achievements as well as individual annual targets achievements:

- a. Company's targets include 40% and
- b. Individual targets include 60%

Annual targets of the Company are set by the Management Board based on the agreements with the Supervisory Board. The targets are achievable, sufficiently ambitious and challenging to provide the long-term value for all stakeholder groups of the Company.

Annual individual targets are set in accordance to company's strategy, performance targets, and priorities of the responsibility area and should be achievable, sufficiently ambitious and challenging to provide the long-term value for all stakeholder groups of the Company.

Variable remuneration of Management Board members and for the key function holders consists of short term variable remuneration component and long term variable remuneration component.

#### **Short term variable remuneration component (annual bonus)**

The target amount for each fiscal year for 100% target achievement is stated in the Management Agreement of the Management Board Member. The short term variable remuneration component (annual bonus) is subject to negotiation and if applicable ERGO Group regulations and is depending on the defined responsibilities and tasks of the respective Management Board Member. The target achievement range is between 0% and 150%. The necessary agreement on targets (corporate goals, individual goals) is to be agreed in the beginning (and at the latest by the end of first quarter) of each fiscal year between the Chairman of the Supervisory Board and the Management Board Member. Individual goals shall be defended to be measurable by objective criteria within evaluation process.

#### **Long term variable remuneration component (long term bonus)**

As a part of the variable remuneration, a long term bonus is agreed for a period of three years respectively. In addition to the Management Board members the long-term target setting is adopted for Head of Internal audit function, Head of Compliance function, Head of Risk management function and Head of Actuarial function (the key functions) according to the following example model.

No.	Long Term Target				Pay out		
	agreed 2015	agreed 2016	agreed 2017	agreed 2018	2018	2019	2020
1	target						
2	target						
3	target						
4		target					
5		target					
6		target					
7			target				
8			target				
9			target				

Figure 2. Long term bonus

### Social package

Company provides for employees attractive Social package, which includes additional vacations, trainings, Health and Life insurance, recognition for length of service, etc.

### Pension scheme for the Management Board

The Company contributes a yearly amount at the rate of 5% of the annual gross fixed remuneration of the Management Board Member for the pension scheme, which the Management Board Member has to choose and indicate to the Company. The insurance may also cover benefits in case of invalidity and for surviving family members as well as accident insurance if the latter was agreed in former Management Agreements.

The payments to the pension scheme shall be made throughout the duration of the Management Agreement upon submission of the corresponding agreement. In case if the contract is terminated before 10 years of service the amount saved stays with the company.

### B.1.5 Material transactions during the reporting period with shareholders, with persons who exercise a significant influence on the undertaking, and with members of the administrative, management and supervisory bodies

On 6 July 2017, ERGO Insurance SE acquired from ERGO Versicherung AG 100% of the shares in D.A.S. Õigusabikulude Kindlustuse AS with whom it subsequently merged. The acquisition cost of the shares in D.A.S. Õigusabikulude Kindlustuse AS amounted to 3,569,520 euros.

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

The Fit and Proper Policy of ERGO documents the criteria and procedures to be applied in order to ensure that all persons who effectively run ERGO or are responsible for other key functions within ERGO, at all times meet the “fit and proper” requirements under regulatory laws based on or resulting from the implementation of the Solvency II framework.

Persons to whom the fit and proper requirements apply:

- Members of the Management Board of ERGO
- Members of the Supervisory Board of ERGO
- Head of the internal audit function
- Head of the compliance function
- Head of the risk management function
- Head of the actuarial function
- Persons who are key function executors (all employees who are performing key functions in actuarial, compliance, internal audit, risk management)

### **B.2.1 Fitness requirements**

A Key Person is considered “fit” if his/her relevant professional and formal qualifications, knowledge and experience within the insurance sector, other financial sectors or other businesses are adequate to enable sound and prudent management. The respective duties allocated to that Key Person and, where relevant, his/her insurance, financial, accounting, actuarial and management skills should be taken into account.

The ERGO Board Members collectively shall possess at least qualifications, experience and knowledge about the following:

- (i) Insurance and financial markets;
- (ii) the business strategy and business model;
- (iii) the system of governance;
- (iv) financial and actuarial analysis and the regulatory framework and requirements.

The respective duties allocated to the individual member shall ensure appropriate diversity of qualifications, knowledge and relevant experience to ensure that the undertaking is managed and overseen in a professional manner. When changes occur within the Management Board of ERGO the collective knowledge of the ERGO Board Members need to be maintained at an adequate level at all times.

Members of the Supervisory Board must have the qualifications, experience and knowledge to fulfill their supervisory tasks adequately. Such qualifications, experience and knowledge may have been acquired from functions in other businesses, the public or academic sector or from political institutions, if relevant topics were in the focus of that function for a longer period of time.

Persons who have other key functions must have theoretical and practical knowledge required for the respective key function and must be able to demonstrate relevant experience with applicable professional and other standards.

### **B.2.2 Propriety requirements**

A Key Person is considered “proper” if he/she is of good repute and integrity. This is not the case when the assessment of the Key Person’s honesty and financial soundness – based on his/her character, and behaviour and business conduct, including any criminal, financial or supervisory aspects – may justify the assumption that such aspects could affect the sound and prudent performance of his/her duties as a Key Person.

The proper requirement also includes Key Persons being expected to avoid, to the extent possible, activities that could create conflicts of interest or the appearance of such conflicts of interest. Key Persons are generally bound by ERGO’s best interests and, accordingly, may not pursue personal interests in their decision-making or utilise business opportunities for personal gain.

### **B.2.3 Assessment of fitness and propriety**

The assessment of each Key Person’s fitness and propriety will be conducted prior to his/her appointment by the corresponding Committee of Assessment.

In order to perform assessment in time and get approval of Financial Supervisory Authority to candidacy of Management Board member, Secretary of Committee on members of the Management Board assessment must be informed in advance (at least 60 days) before planned beginning of office duties.

#### **Assessment of fitness**

The fitness assessments shall include, but will not be limited to, a review of employment history, references and educational and professional qualifications in relation to the respective duties allocated to the relevant key function. The fitness assessment shall be based on the definition of the required knowledge, experience and qualification for the allocated duties.

While knowledge and qualification are significant factors, account may be taken of whether further professional training can be arranged in due course to remedy any aspects of the Key Person’s qualifications with respect to the fitness requirements that have been identified as deficient during the assessment.

#### **Assessment of propriety**

When assessing the propriety of Key Persons, their honesty and financial soundness shall be assessed based on evidence regarding their character, personal behaviour and business conduct, including any criminal, financial or supervisory concerns regardless of location.

The considerations include, but are not limited to, the following:

Criminal offences under the laws governing banking, financial, securities or insurance activity, or concerning securities markets or securities or payment instruments, including, but not limited, to laws on money laundering, market manipulation, or insider dealing and usury as well as any offences of dishonesty such as fraud or financial crime. They also include any other criminal offences under legislation relating to companies, bankruptcy, insolvency, or consumer protection.

Any other criminal offences in the past may also be relevant, as they can cast doubt on the integrity of the Key Person.

Disciplinary or administrative offences made under an activity of the financial sector, including offences under legislation relating to companies, bankruptcy, insolvency, or consumer protection.

Other circumstances than court decisions and on-going judicial proceedings, which may cast doubt on the repute and integrity of the person, including current investigations or enforcement actions, the imposition of administrative sanctions for non-compliance with provisions governing banking, financial, securities or insurance activity, securities markets, securities or payment instruments or any financial services legislation.

Current investigations or enforcement actions by any relevant regulatory or professional body for non-compliance with any relevant provisions could be taken into account.

However, previous infringements do not automatically preclude the Key Person from being assessed as proper for the duties he/she is to perform. While criminal convictions, disciplinary or administrative measures or past misconduct are significant, the assessment must be carried out on a case-by-case basis. Hence, consideration must be given to the type of misconduct or conviction, the level of appeal (definitive/final vs. non-definitive/non-final convictions), the lapse of time since the misconduct or conviction, its severity and the Key Person's subsequent conduct.

The proper assessments shall include, but will not be limited to, a review of criminal records and personal declaration of no conflict of interest.

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

#### **B.3.1 Description of risk management system**

As part of the Munich Re Group, ERGO is committed to turning risk into value. Risk management is an integral part of our corporate management with regard to achieving this goal. Risk management includes all strategies, methods and processes to identify, analyse, assess, control, monitor and report the short and long term risks ERGO faces or may face in the future.

Risk management is performed at all levels of ERGO Group and is organized according to the three "lines of defence": risk takers (1st line), Risk Management Function, Actuarial Function, Compliance Function (2nd line), and Internal Audit Function (3rd line).

## Risk management processes

We view risk management as an enterprise wide discipline by which we identify, assess, measure, steer, monitor and report risks from all potential sources for the purpose of achieving our risk management objectives. The diagram below shows the risk management cycle and associated key tasks.

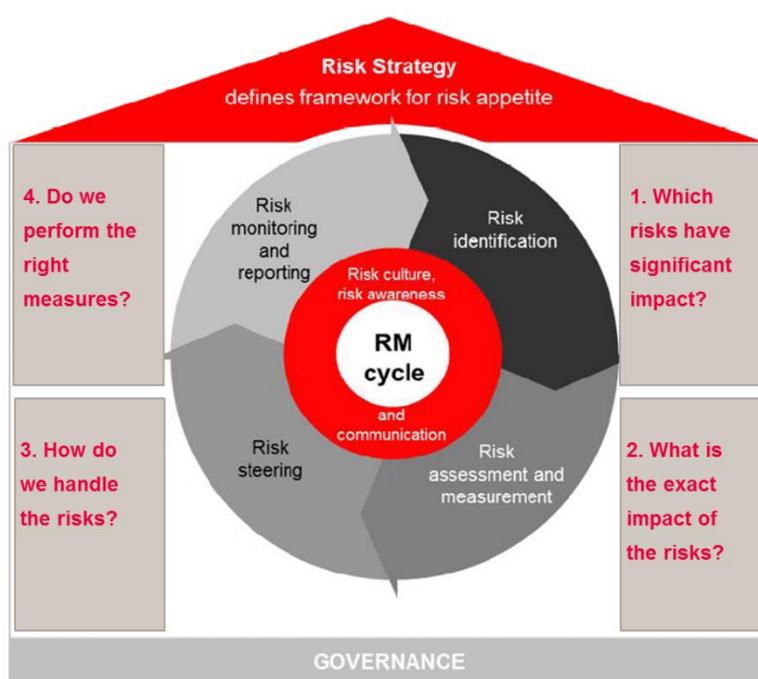


Figure 3. Risk Management Cycle

### Risk strategy

The risk strategy is the connection between the business strategy and risk management and is based on the company's risk profile. It defines the overall framework for the risk appetite and impacts on the general proceedings in the risk management cycle.

The risk strategy complements our business strategy. It describes the extent to which a risk is desirable and, consequently, whether it is acceptable or must be mitigated through risk limits or budgets, risk controls or risk transfer.

The development of the risk strategy is closely aligned with the annual business planning cycle. It starts with a check of actual year-end exposures against tolerances and an initial proposal of tolerances for the next planning year, including an indication of likely exposure bottlenecks and free risk-bearing capacity for strategic asset liability mismatch risk. It concludes with a recommendation of operational limit and trigger amounts, by group/segment or company level, in order to ensure that strategic risk tolerances are respected. Subsequently, the Management Board approves the risk strategy.

To implement and operationalise the risk strategy, a system of relevant risk criteria, limits and triggers are defined. This is described for the ERGO Group and its entities in the "Risk Limit and Trigger Manual for ERGO Group (incl. ERGO International)" (ERGO RLTM). ERGO Integrated Risk Management department (IRM) has the overall responsibility for the content of

both documents and ensures that they are reviewed and updated annually in line with the framework set by Munich Re's RLTM.

### **Risk identification**

Risk identification is performed by means of appropriate systems and indicators (quantitative component) and a number of risk surveys, which are supplemented by expert opinions and assessments by selected, highly experienced managers (qualitative component). Our ad-hoc reporting process provides for staff to report risks to the risk management function at any time.

The regular risk identification process is initiated and coordinated by risk management function. The risk takers (1st line of defence) are responsible for using the methodology established by risk management function to identify risks and to verify previously identified risks within their respective area of responsibility.

### **Risk assessment and measurement**

Based on the results from the risk identification, risks can be quantified or assessed qualitatively. The frequency of the assessment may differ dependent on the nature of the risk and the significance of a single risk or group of risks.

ERGO uses the standard formula for risk quantification. For all risks covered by the standard formula, the (sub) module results are used in general as basis for the risk quantification. Risks that are not modelled (e.g. strategic risks, reputational risks and liquidity risks) are evaluated qualitatively with specific assessment methods.

Stress tests and scenario analyses are implemented where appropriate. There are several methods how to implement the analysis, depending on risk type (quantifiable vs. non-quantifiable), time horizon (trend vs. instant) and valuation methods.

### **Risk steering**

Risk steering measures aim to reduce the probability of the risk occurring or the financial impact and resulting losses and should ensure the achievement of business objectives. The measures have to be within the scope of the risk bearing capacity and relevant regulatory and group requirements (risk strategy, risk management policy and other applicable standards). In general, risks can be taken/accepted, mitigated, transferred or terminated.

We manage risks through underwriting guidelines, tools and processes, investment controlling, and a new product introduction process. The risk appetite and specific risk tolerances are detailed by the RLTM and Entity Specific Appendix to the Risk Management Policy, which describes risk criteria per risk type and specifies limit and trigger amounts.

Within the meaning of an early warning system, the limits and triggers are regularly observed by the respective risk takers and are contained in the regular risk reporting. Appropriate measures are defined and approved by the responsible management.

### **Risk monitoring**

Risk monitoring focuses on the risk profile and takes into account the respective risk limits, risk triggers, risk accumulation and interdependencies. Not only is the risk profile itself be monitored but also the implementation of risk strategy, the risk relevant methods and

processes as well as the overall management of risks. Additionally, the overall solvency position is continuously monitored taken into account the results of the SCR calculation and the risk bearing capacity.

The methods for risk monitoring include comparison of actual with target, analysis of the efficiency of risk measures, analysis of the results of the risk profile analysis and performance measures as well as the monitoring of existing controlling figures linked to risk management. Escalation processes have been defined for limit breaches and are also documented in the RLTM.

In 2017 ERGO has elaborated a system of Key Risk Indicators that ensures early recognition of risks and prepares proposals for suitable countermeasures. Key Risk Indicators focus on risks that could have a sizeable adverse impact on the business or the company and are reported to the Management Board quarterly.

### **Risk reporting**

To ensure continuous monitoring regular reporting process is established. Input is gained from a variety of sources such as the bottom up risk assessments, ad-hoc reports, internal audit reports, operational risk event reporting, early warning reporting, quarterly solvency calculations, company results, as well as discussions with the management. The internal risk report contains information about the key risks the company is exposed to and should enable management to evaluate the current risk profile and decide on necessary steering measures.

In case of a significant change in the risk situation, an immediate reporting to the company's management is performed. The ad-hoc risk reporting process complements the regular risk reporting processes thus ensuring that new risks or significant changes to existing risks are reported comprehensively and swiftly. This report includes an appropriate risk analysis and assessment. Ad-hoc reporting on arising risks is to ensure that the involved parties are informed and – where necessary – appropriate measures to steer and control the risk have been initiated.

### **B.3.2 Description of Risk Management Function**

Methods, standards, processes and policies are defined by ERGO IRM in line with the overall Munich Re Group framework. Local risk management function is responsible for implementing the IRM methodology on a legal entity level. The Management Board of the Company is ultimately responsible for risk management.



Figure 4. Risk Management Organization Munich Re and ERGO Group

In ERGO the risk management function is carried out by Risk Management division. The Head of Risk Management reports directly to the CFO. Reporting lines have been set up between the head of risk management function and ERGO Group CRO.

The risk management function is the main operating unit responsible for implementing the risk management system in ERGO. Its main purpose is to assist the Management Board to effectively implement a risk management system and integrate it into business operations. Members of the risk management function are not engaged in regular business operations to ensure their operational independence. The risk management function has full and unlimited access to information throughout the company.

Main functions and objectives:

- **Coordination tasks:** The risk management function coordinates the Risk Management activities at all levels and in all business areas. In this role, it is responsible for the development of strategies, methods, processes and procedures for the identification, assessment, monitoring and management of risks, and ensures correct implementation of Risk Management guidelines.
- **Risk control tasks:** The risk management function is responsible for mapping the overall risk situation of the company. Its tasks also include adequate consideration of reciprocal interactions between individual risk categories, the preparation of an aggregated risk profile as well as, in particular, the identification of risks threatening the continued existence of the company/Group.
- **Early warning tasks:** The responsibility of the risk management function also includes implementation of a system that ensures the early recognition of risks and preparation of proposals for suitable countermeasures.
- **Advisory tasks:** The risk management function advises the Board of Management on Risk Management matters and supports strategic decisions in an advisory capacity.
- **Monitoring tasks:** The risk management function monitors the effectiveness of the Risk Management System, identifies possible weaknesses, reports to the Management on these and develops suggestions for improvement.

The risk management function also ensures comprehensive reporting to the Management; in addition to illustrating the current risk situation, this also includes Own Risk and Solvency

Assessment (hereinafter ORSA) results and an assessment of the quality of the Risk Management System.

The risk management duties and responsibilities in ERGO are divided between Risk Management and Actuarial functions.

In addition to the actuarial activities, Actuarial function is responsible for the risk management system with focus on the projection of the future financial position, development of methods and processes in line with group standards for risk evaluation and monitoring (especially related to quantitative risk evaluation), identifying, assessing and managing risks related to technical provisions, identifying and assessing risks related to underwriting and reinsurance and the assessment of the solvency position.

Risk management is embedded in relevant steering and business processes. This is ensured by clearly defining processes, roles and responsibilities. It can be stated, that risk management is involved whenever decisions are taken that may lead to a significant change in the risk profile. When decisions are required that lie outside the predefined level of authority of the risk taker, involvement of and approval from risk management is mandatory.

The examples of the processes, where risk management function is involved, are:

- New products incl. adjustments (insurance products, investments) and new business segments
- Outsourcing
- Investment Management
- Underwriting/Reinsurance
- Strategic Planning Process

### **B.3.3 Own risk and solvency assessment**

The Own Risk and Solvency Assessment (ORSA) is an integral part of our risk management system.

The performance of the ORSA is embedded in the relevant processes, e.g. risk management, planning process, capital management. The results and conclusions of the ORSA – documented annually in the ORSA Report – are an important management tool and have to be taken into account in the strategic decisions on an ongoing basis.

The Board of Management has the ultimate responsibility for ORSA. It plays an active role in the set-up of ORSA and has to challenge the ORSA outcome. The objectives of the ORSA and the corresponding roles, responsibilities and processes are described in the ERGO ORSA Policy which has been approved by the ERGO Board together with an Entity Specific Appendix.

The development of the risk strategy is closely aligned with the annual business planning cycle and the corresponding ORSA considerations. The ORSA aims to promote a better understanding of the specific risk profile of the company and to enhance the decision making on board level by using the ORSA results e.g. within the business planning process. The ORSA process also allows disclosure of sufficient and clear information to relevant stakeholders.

The regular ORSA activities associated with the business planning process are conducted annually or more often if necessary (after significant changes in the risk profile). Timeline for annual ORSA is defined in line with the Company's annual planning process. More frequent

monitoring is in place for the most relevant risk criteria via quarterly risk reporting as well as ad hoc reporting.

As part of the ORSA, the connection between the risk profile, the risk tolerances and the own solvency needs are outlined. Own solvency needs is determined based on the following processes:

- Definition and annual review of the "Financial Strength" criteria in Risk Strategy
- The assessment of the quantity and quality of Own Funds
- Assessment of actual capital adequacy over the business planning horizon
- Demonstration of main assumptions underlying the projections
- Performance of stress test and scenario analysis
- Assessment of the model appropriateness
- Assessment of the risks not covered in the model

Within ORSA probable and potential capital needs to manage the capitalisation of the company are identified. The risk management function makes proposals if additional measures are necessary together with a statement if additional risk capital is required for the coverage of non-modelled risks. More specifically, the outcome of the ORSA shall feed into the development of a capital management plan over the time horizon of the business plan. The risk management function should propose actions based on the information gathered during the performance of the ORSA if necessary.

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

### **B.4.1 Description of the internal control system (ICS)**

Our internal control system (ICS) is a system for managing operational risks integrated across all risk dimensions and areas of the company. The ICS meets the requirements of corporate governance as well as the legal and regulatory requirements.

ERGO's ICS functions as an integral component of our group-wide risk management and hence constitutes a key element of ERGO's corporate governance. Within the ICS, the significant operational risks and corresponding controls are identified, analysed and assessed across all important risk dimensions (financial reporting, compliance and operations) with the aim of achieving a harmonised, holistic approach to risk controls with no overlaps and no gaps.

The ICS is based on the concept of the three lines of defence represented by three roles: risk-takers (those who accept risk), risk controllers (those who monitor risk) and independent assurance (those who are independent of the operating business and examine the design and performance of the risk controls). The overall responsibility for risks and their control, and for setting the overall risk tolerance, lies with the Board (Risk owner).

Organizational responsibility is under the Risk Management. The departments are responsible for the risks and controls within their area. The integration of all departments creates a uniform understanding of risk. This enables us to improve our awareness of risks and controls. Clear responsibilities for risks, controls and control measures also create transparency.

By making our risk situation transparent in this way, we can focus on and react rapidly to possible weaknesses or changes in internal and external requirements. This means that we are able to identify risks at an early stage, address control shortcomings immediately and take effective remedial action.

Internal Audit assesses regularly the effectiveness of the ICS in the key processes and applications.

## **B.4.2 Compliance function**

### **Description the compliance function**

The Compliance Function includes advising the administrative, management or supervisory body on compliance with the laws, regulations and administrative provisions adopted pursuant to Solvency II directive. It also includes the assessment of the possible impact of any changes in the legal environment on the operations of the undertaking concerned and the identification and assessment of compliance risk.

The Compliance function is part of internal control system. Considering this obligation, ERGO has established special job positions, related to this function. The Head of Legal and Compliance division in Baltic States is considered as the Chief Compliance Officer. Three local Compliance Officers (i.e in Estonia, Latvia and Lithuania) are appointed from Legal and Compliance division.

The Head of Legal and Compliance division in the Baltic States reports (functionally) directly to the member of the Management Board, responsible for this area (CEO). Local Compliance Officers report (functionally) directly to the Chief Compliance Officer.

The activity of the Compliance function is regulated with the Compliance Manual (version 2) applicable from 1st of June 2016.

Compliance Manual comprises definitions, objectives, principles, instruments and methods for the assurance of compliance in ERGO. All the main principles of the Compliance Manual are also reflected in the job descriptions of persons performing the function.

### **The Compliance Function has these basic responsibilities:**

- 1. compliance risk control** - identification and assessment of compliance risks, recommendations for the mitigation and elimination of compliance risks, participation in design of compliance risk control measures;
- 2. early warning** - monitoring of significant changes in the legal environment and provision of relevant information to respective recipients; recommendations regarding compliance risks and escalation;
- 3. consulting and reporting** - consultation on compliance with applicable legal requirements and possible impact of legal changes, compliance trainings, escalation of relevant compliance issues, participation in relations with other subjects;
- 4. monitoring** - monitoring of adherence to legal requirements on a regular basis and creation of necessary controls.

### **The strategic objectives of the Compliance:**

- 1) to reduce or eliminate the possibility of loss of reputation and credibility of ERGO, resulting from failure to observe or incorrect application of applicable laws and/or ERGO internal regulations, as well as significant standards of ERGO Group and local supervisory authorities;
- 2) to promote corporate culture through active value management including establishment of a tone-from-the-top concerning compliance matters;
- 3) to support ERGO Board and executives in their actions aimed at mitigating or eliminating compliance risks;
- 4) define a communication strategy to staff / management concerning Compliance matters (e.g. newsletter, tips etc.).

### **Compliance risk management**

Compliance function performs the on-going compliance risk management. This process includes:

- identification and assessment of compliance risks;
- measurement of compliance risks;
- determination of control measures;
- collecting and reporting of information on compliance risks;
- recommendations regarding actions for mitigating and eliminating compliance risks;
- monitoring of compliance risks.

### **Area of compliance (domains)**

Compliance Function bears responsibility for the objectives under the following subject areas (domains):

1. Code of conduct (incl. conflicts of interest)
2. Gifts, invitations and incentives
3. Reputational risks
4. Internal Fraud prevention
5. Bribery / corruption
6. Money laundry prevention
7. Antitrust compliance
8. Financial sanctions
9. Personal data protection
10. Sales compliance

For these domains Compliance Function is responsible for risk analysis, program, policies, communication, training and inspections. The spectrum of ERGO covers many other related areas also which are not managed by Compliance Function directly. Therefore Compliance Function has defined and concluded written interfaces with relevant units with special responsibilities. These areas are as follows:

1. HR and occupational safety;
2. Information security;
3. Business Continuity Management;
4. Investments;

5. Accounting and taxes
6. Internal fraud.

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

Internal Audit of ERGO supports the Supervisory Board and the Management Board in carrying out its monitoring tasks. In particular, it is responsible for examining the system of internal governance. These include the risk management system, the internal control system (ICS) and the three key functions compliance, risk management and actuarial.

### **B.5.1 Organization**

The Internal Audit is an independent function. However, it operates within the framework of the standards applicable throughout the Munich Re Group. It is legally assigned to ERGO Insurance SE. The Head of Internal Audit is directly subordinated administratively to the Chief Executive Officer (CEO) of ERGO and functionally – to the Supervisory Board. It also has a so-called "dotted reporting line" to the Head of ERGO Group Audit.

The audit mandate of Internal Audit covers all units of ERGO, its branches and subsidiaries.

### **B.5.2 Core tasks of Internal Audit**

The core tasks of Internal Audit include:

Audit Performance: Internal Audit audits the Governance System, consequently the entire business organization, and in particular the Internal Control System in terms of appropriateness and effectiveness. The auditing work of Internal Audit must be carried out objectively, impartially and independently at all times. The audit area of Internal Audit covers all activities and processes of the Governance System, and explicitly includes the other Governance Functions. The audit assignment includes the following areas in particular:

- Effectiveness and efficiency of processes and controls,
- Adherence to external and internal standards, guidelines, rules of procedure and regulations,
- Reliability, completeness, consistency and appropriate timing of the external and internal reporting system,
- Reliability of the IT systems,
- Nature and manner of performance of tasks by the employees.

Reporting tasks: A written report must be submitted promptly following each audit by Internal Audit. At least once per year, Internal Audit will prepare a report comprising the main audit findings for the past financial year. Within the follow-up process, Internal Audit is also responsible for monitoring the rectification of deficiencies.

Consulting tasks: Internal Audit can provide consulting work, for example within projects or project-accompanying audits, and advise other units concerning the implementation or alteration of controls and monitoring processes. The prerequisite is that this does not lead to conflicts of interest and the independence of Internal Audit is ensured.

### **B.5.3 Independence and Objectivity**

The managers and employees of Internal Audit are aware and adhere to the national and international standards for the professional standards of Internal Audit.

This also applies to the principles and rules for safeguarding the independence and objectivity of Internal Audit. Numerous measures (adequate positioning in the organizational structure, consistent segregation of duties, and comprehensive quality assurance during the audit) ensure that the independence and objectivity of the audit function is adequately ensured.

The Head of Internal Audit is directly subordinated administratively to the CEO and functionally – to the Supervisory Board. She has direct and unrestricted access to the Management Board and the Supervisory Board of ERGO and all branches and subsidiaries. As a service provider for the company she is independent from all other functions of the company.

In order to ensure independence, the employees of the Internal Audit do not assume any non audit-related tasks. Employees who are employed in other departments of the company may not be entrusted with Internal Audit tasks. This does not exclude the possibility for other employees to work for Internal Audit temporarily on the basis of their special knowledge or personnel development measures.

When assigning the auditors, attention is paid to the fact that there are no conflicts of interest and that the auditors can perform their duties impartially. In particular, it is ensured that an auditor does not audit any activities for which he himself was responsible in the course of the previous twelve months.

Internal Audit is not subject to any instructions during the audit planning, the performance of audits, the evaluation of the audit results and the reporting of the audit results. The right of the Supervisory Board and the Management Board to order additional audits does not impair the independence of Internal Audit.

According to the statement of the Head of Internal Audit, the function has sufficient resources and conducts the audits on its own responsibility, independent and impartially (objectively). The Head of Internal Audit contributes to the independence and objectivity of the auditing function by his behavior.

During the reported period the independence and objectivity of the Internal Audit was not impaired at any time.

## **B.6 Actuarial function**

### **B.6.1 Set up of Actuarial Function**

The Art. 48 of the Solvency II Directive obliges insurance and reinsurance undertakings to set up an effective Actuarial Function. Within the scope of the tasks as per Solvency II, the Actuarial Function performs monitoring tasks in the actuarial field as the 2nd line of defence. Focal points are the coordination of the calculation of technical provisions, monitoring tasks are related to the underwriting policy as well as the use of reinsurance. The Actuarial Function also supports the Risk Management Function.

ERGO actuaries have a detailed understanding of economic, financial, demographic and insurance risks in the Baltic States and expertise in developing and using statistical and financial models to facilitate financial decisions, pricing, establishing the amount of liabilities, and setting capital requirements for uncertain future events within ERGO. The role of the Actuary Function in ERGO is to measure, manage, and mitigate risks by using statistical models and analysis to enhance the understanding of risks assumed. Actuaries also provide advice on the adequacy of risk assessment, reinsurance arrangements, investment policies, capital levels and stress testing of the future financial condition of these companies.

The Actuarial Function performs its tasks independently from the front office and from risk taking activities of the Management Board and has no responsibility for the company's profits and financial results. The Head of Actuarial Department (Appointed Actuary) carries out the Actuarial Function in ERGO. Appointed Actuary reports to the Management Board member CFO.

### **B.6.2 Tasks of Actuarial Function**

The Actuarial Function assumes the lead management role in the coordination of all work to the calculation and valuation of technical provisions for purposes of Solvency II and is responsible for the development and appropriateness of corresponding methods and the underlying models, procedures and processes. This includes both the statistical quality of the actuarial valuation as well as the quality of the data used and the validation of the results.

The Actuarial Function informs and advises the Management Board concerning the underwriting policy as well as concerning the appropriateness of the reinsurance agreements. In particular, it indicates the interactions between the reserving, the underwriting and the reinsurance cover, and develops recommendations for optimizing the underwriting, acceptance and reinsurance strategy. At least once a year the Actuarial Function provides a written report to the Management Board.

In addition, the Actuarial Function supports the Risk Management Function in its tasks, in particular terms of concerning risk and solvency assessment, and also provides actuarial expertise.

## **B.7 Outsourcing**

### **B.7.1 Description of Outsourcing**

Guidelines on the Minimum Requirements for Outsourcing for the Companies of the ERGO Group (Outsourcing Policy) and its Entity Specific Appendix regulate the outsourcing of any critical or important operational functions or activities.

An outsourcing arises when a service provider is directly selected by ERGO to carry out certain activities and processes in connection with the performance of insurance, financial or other services that are:

- Otherwise provided by the insurance company itself (insurance-specific), and
- Important for the company.

An activity is insurance-specific only when there is a relation between the outsourced activities and the original insurance business. A transferred task is considered important for the company when it is long-term (usually more than one year) or occurs with a certain frequency

(not one-off business or business with occasional external character) and is also of significance for the company (thus not ancillary, preparatory or subordinate activities). This applies also in case of partial transfer of the task.

The important outsourcing (outsourcing of important function or insurance activity) arises when an insurance company would otherwise not be able to provide its services to its policyholders (indispensability) and in the case of a malperformance or an unsuitable service provider the abstract risk would arise that the quality of the business organization would be significantly impaired or the operational risk unreasonably increased.

In this sense, the outsourcing of the following functions and insurance activities are considered as important outsourcing:

- The outsourcing of key functions of the company:
  - internal audit function;
  - compliance function;
  - risk management function;
  - actuarial function.
  
- The outsourcing of other functions and insurance activities that are fundamental for the ability of the company to carry out its core business, such as:
  - sales,
  - claims management,
  - policy management, incl. underwriting
  - accounting,
  - investments and/or asset management,
  - product development and pricing of insurance products,
  - rendering of data storage services
  - regular maintenance and support for the relevant IT systems
  - ORSA process (Own Risk and Solvency Assessment).

A transferred task will be considered important for the company when it is related to any of the above mentioned important functions or insurance activities or when it does not fall under definition of importance, but is insurance specific and has annual net costs above € 50.000,00.

In the event of an outsourcing, the responsibility for the outsourced task remains with the management of the outsourcing company, which also has to ensure that the outsourcing requirements have been fulfilled.

The outsourcing must not be allowed to hinder or impair the correct performance of the outsourced tasks and activities, the possibilities of control for the management of the outsourcing company and the audit and control rights of the supervisory authority. Service providers can be an external provider or a group company.

#### **B.7.2 The following critical or important operational functions or activities are outsourced in ERGO**

- **Sales function** is partially outsourced.
- **Claims management function** is partially outsourced.

- **Policy administration** is partially outsourced, specifically call centres and printout and sending of dunning letters.
- **Investments and/or asset management** is outsourced.
- **Rendering of data storage services** is partially outsourced. Specifically, administration and tuning of Oracle database of ERGO Latvian branches and services related to archiving.
- **Regular maintenance and support for the relevant IT systems** is partially outsourced.

ERGO has not outsourced any key functions.

All of the service providers of above mentioned outsourced or partially outsourced functions are located on the territory of the European Union.

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

In 2017 the company started the review of its governance system and concluded that amendments into the system, organization and structures are needed. Based on the conclusions, changes to the company's governance system will be implemented during year 2018, including changes in Management Board and Supervisory Board.

## **C. Risk Profile**

The risk profile describes the risks ERGO is exposed to. The management board considers the risk profile when deciding on steering measures. The overall risk profile is integral part of the annual ORSA report and includes a qualitative and quantitative assessment for modelled and non-modelled risks. When determining the risk profile, ERGO looks at the risks arising from the business portfolio across all risk categories.

The Risk Management Function is responsible for ensuring that adequate processes surrounding the overall risk profile have been established. The risk profile also provides important input for the determination of the risk appetite in the annual risk strategy as well as for internal risk reporting and ORSA. Significant changes to the company risk profile are reported promptly by the Risk Management Function to the management board.

### **Description of how assets have been invested in accordance with the „prudent person principle“**

Company runs liability based investment approach i.e. first step in investment process is to establish different characteristics of liabilities (e.g. maturity structure, currency structure etc.). After that, risk neutral portfolio of assets can be established. Risk neutral portfolio is hypothetical asset portfolio which replicates liability structure. In case, Company has sufficient solvency capital available it can deviate from risk neutral asset portfolio. Otherwise Company will build up asset portfolio which corresponds to liability structure as much as practically possible.

Composition of asset portfolio will take into account appropriate diversification between asset classes and issuers. Proper quality and security of the asset portfolio is ensured by monitoring average rating of fixed income portfolio (as this forms biggest part of the asset portfolio). Company ensures also adequate liquidity of the portfolio – sufficient amount of funds must be available even in most severe circumstances.

### **Use of special purpose entities**

The Company does not use any purpose companies within the meaning of Directive 2009/138 / EC of the European Parliament and of the Council.

## **C.1 Underwriting risk**

### **C.1.1 Risk exposure**

ERGO operates in three Baltic countries with a broad range of products. The Company's underwriting strategy seeks diversity to ensure a balanced portfolio. ERGO analyses its insurance portfolio on permanent basis and has developed sophisticated tariff models to price the products.

ERGO is acknowledging the following underwriting related risks: premium and reserve risks, catastrophe risks. The premium and reserve risk takes into account losses that occur at a regular frequency. Extreme events, which occur very rarely, are taken into account in the catastrophe risk.

Premium risk is related to future claims arising during and after the period for the solvency assessment. The risk is that the expenses plus the volume of (covered but not incurred) losses for these claims (comprising both amounts paid during the period and (incurred but not settled)

claim provisions made at its end) are higher than the premiums received. Premium risk is present at the time the policy is issued, before any events occur. Premium risk also arises because of uncertainties prior to issues of policies during the time horizon.

Reserve risk stems from two sources: on the one hand, the absolute level of the claims provisions could be misestimated. On the other hand the actual claims will fluctuate around their statistical mean value because of the stochastic nature of future claims pay-outs. The company is also subject to longevity as well as revision (inflation) risk stemming from Motor Third Party Liability pensions.

In case of ERGO, the catastrophe risk includes only man-made catastrophes and no natural catastrophes. As specified in the Delegated Acts, none of the Baltic countries is exposed to specified natural catastrophes (windstorm, earthquake, flood, hail and subsidence). Nevertheless, in order to withstand catastrophes, however unlikely, ERGO is purchasing specific catastrophe reinsurance cover.

### **C.1.2 Material changes in Underwriting risk over the reporting period**

During 2017 portfolio increases have had clear impact to premium and reserve risk capital calculations. While underwriting risk has increased together with the portfolio, capital requirements for other risks have decreased and thus the share of underwriting risk in total capital requirement has increased.

By lines of business the biggest share of underwriting risk is expectedly rising from Motor portfolio. During 2017 Company's Motor portfolio in terms of Gross Written Premium and its share in total portfolio increased, when compared to year 2016.

### **C.1.3 Measures for risk assessment**

The significant Underwriting risks are evaluated within the Standard Formula.

Risk capital for underwriting risk is most affected by the quick portfolio growth, the composition of the portfolio, in terms of both quality and line of business balance, and environmental changes.

Company believes that over the years it has accumulated enough knowledge and expertise to manage the growth in underwriting risk well. Qualified actuarial skills are used in portfolio pricing to establish adequate premium levels as well as appropriate reserve and capital levels, underwriters and claims handlers of the Company are highly experienced and reinsurance contracts are in place. All assumptions and models are regularly reviewed, actuarial modelling results are compared against experience in both pricing and reserving.

### **C.1.4 Material risk concentrations**

ERGO belongs to Munich Re Group that has defined a methodology applicable to all ERGO Group subsidiaries for performing the accumulation risk management process. The process for accumulation risk management is intended to ensure that all risks that could pose a substantial threat to the business are identified, assessed and steered.

Underwriting risk concentration risk stems from high concentration of risks in one building or small geographical area. In ERGO the risk is the most significant in property lines of business.

Additionally the risk may arise in the motor business, i.e. concentration of risks in the ownership of one customer or higher concentration of special client segments due to anti-selection.

### **C.1.5 Risk reduction techniques**

In order to protect its solvency position ERGO has concluded several reinsurance agreements. The main forms of reinsurance are risk based obligatory non-proportional and risk based obligatory proportional reinsurance, accompanied by catastrophe reinsurance protection for aggregation of net risks deriving from several of lines of business. Risks exceeding the limits of obligatory reinsurance contracts or falling outside their scope are reinsured on a facultative basis.

While preparing the obligatory reinsurance program the portfolio structure, available solvency free capital and prudent future development trends are considered. The insurance portfolio is modelled in order to find optimal level of retention as well as the required treaty limits.

ERGO Group internal regulations and reinsurance company ratings are used in the process of choosing the reinsurance partners. The reinsurance program is approved by the ERGO Management board on annual basis. The Company has adopted the reinsurance strategy and process for purchasing facultative reinsurance. In case of deviances from reinsurance programs Risk Management approval is necessary.

### **C.1.6 Description of Stress tests and scenario analyses**

Primary objectives of stress tests and scenario analyses are to enhance the transparency of the risk profile particularly by evaluating the sensitivity of the solvency ratio and the Company's viability. The focus of the stress tests and scenario analyses is set on assessing the Solvency Capital Requirement (SCR) and Minimum Capital Requirement (MCR) according to the Standard Formula and Own Funds (OF) impact of scenarios or stresses.

The stress tests and scenario analyses should cover all material risks. The materiality concept covers the assessment of the materiality for all quantifiable risks.

The following main objectives are covered by the stress tests and scenario analyses:

- Transparency of the risk profile:
  - Sensitivity of solvency ratio according to the Standard Formula
  - Identification of scenarios being a threat to the company's viability
- Risks in the business plan:
  - Analysing the risks in missing targets set in the business plan.

In addition to the impact on SCR, this year the impact on MCR was analysed. The stress test with the highest impact is Nat Cat event and related reinsurance default, which would lead to insolvency (decrease of solvency ratio by 26,6%) had the relevant effect also to MCR.

The same event would be one of the scenarios for the reverse stress test, which we use to determine the stress level giving rise to a certain amount of loss. As a first step, we performed qualitative analyses which scenarios may lead to a critical solvency situation, a situation in which the survival of the company is not ensured anymore. Last year we tested under which stress level the OF would fall to 0. As all the identified reverse stress test scenarios, which could lead Own Funds to 0, seemed to be very unlikely and the probabilities of such deviations are very low, this year the objective of stresses was bringing Own Funds to the level of SCR

and MCR, i.e. Own Funds = SCR/MCR. No other single scenario used would on its own directly lead Own Funds to SCR. The amount Own Funds exceed SCR can withstand 8 of 1 m€ losses.

Similar to last year, increase of combined ratio has large impact on company's solvency ratio. Another potentially harmful scenario would be very fast portfolio growth accompanied by increases in claims and expenses together with unfavourable development of past claims (e.g. inflation, legal environment).

## **C.2 Market risk**

### **C.2.1 Risk exposure**

Due to the fact that a large portion of our Company's portfolio consists of (fixed-) interest securities, changes of the general interest rates and credit spreads have a considerable effect on the value of our investments.

The following significant risk drivers and risk causes or challenges regarding risk identification and assessment have been identified:

- Interest rate risk (incl. spread risk and interest volatility)
- Property risk

Since de-risking of asset portfolio in 2016 whereas Company realized equity positions, emerging market bond positions and participation in Real Estate Company ERGO Invest SIA, Company is relatively resilient to possible shocks in financial markets.

### **C.2.2 Measures for risk assessment**

The significant risks of the asset portfolio are evaluated within the Standard Formula. Additionally, exposure to fluctuations in market value is assessed on an ongoing basis using four internal models. The detailed description of the models can be found in Chapter C.2.5 "Description of stress tests and scenario analyses".

### C.2.3 Material risk concentrations

Below is the list of 10 counterparties with highest market exposure

Counterparty	Type of exposure	Rating class (when available)	Total exposure, €
Vilnius, Gelezinio Vilko 6/6A, Lithuania	4 - Property exposure		5 460 000
Barclays PLC	1 - Standard	A	4 782 038
Commerzbank AG	3 - Mortgage covered bond or public sector covered bonds exposure	AAA - AA	3 527 061
Italien, Republik	1 - Standard	BBB	3 434 400
Münchener Rückversicherungs-Gesellschaft AG	1 - Standard	AAA - AA	3 222 662
Groupe BPCE S.A.	3 - Mortgage covered bond or public sector covered bonds exposure	AAA - AA	3 175 715
Norddeutsche Landesbank Girozentrale	3 - Mortgage covered bond or public sector covered bonds exposure	A	3 072 582
Landesbank Berlin Holding AG	3 - Mortgage covered bond or public sector covered bonds exposure	AAA - AA	2 564 748
Norddeutsche Landesbank Girozentrale	3 - Mortgage covered bond or public sector covered bonds exposure	AAA - AA	2 346 434
Belfius Bank S.A.	3 - Mortgage covered bond or public sector covered bonds exposure	AAA - AA	2 172 148

### C.2.4 Risk reduction techniques

Company does not have any risk mitigation techniques currently in place. At the end of 2017, Company did not have any risk mitigation contracts outstanding.

### C.2.5 Description of Stress tests and scenario analyses

Exposure to fluctuations in market value is assessed on an ongoing basis using four internal models. The first, Net Loss Limit (NLL), monitors the probability of achieving a result that surpasses the minimum investment result fixed by the actuaries. The second, Credit Value at Risk (CVaR) measures the potential loss that a portfolio of assets, exposed to credit risk, could suffer due to a weakening of the issuer's credit rating. The third model, Market Value at Risk (MVaR), measures the possible decrease in value of the existing investment portfolio during one year. The fourth model, Investment Asset/Liability Mismatch (InvALM), combines the two aforementioned models (CvaR, MVaR) with company's liability side and monitors, how the market events might influence the company due to the risks taken on asset side exceeding the risk neutral position from liabilities.

## C.3 Credit risk

### C.3.1 Risk exposure

Credit risk is defined as the economic loss that can arise if the financial situation of a counterparty changes. The credit risk includes both the risk of migration (deterioration of the

"credit rating" of the counterparty) and the credit spread risk (price changes within a fixed rating class).

In order to monitor and control our group wide credit risks, the Group has implemented a cross-balance-sheet counterparty limit system valid throughout the group. The liability-driven Investment Process is designed to manage and to limit this risk to an acceptable level.

### **C.3.2 Measures used for risk assessment**

Credit risk is not evaluated explicitly in Standard Formula approach. It is only captured implicitly under a combination of market and counterparty default modules. From the perspective of ERGO Group the latter is proved to be reasonable since there are no material differences between corresponding shocks applied in Group Internal Model and Standard Formula.

In our fixed-income investments, we control the associated credit risk by selecting issuers with appropriate quality and observing counterparty limits. The rating of external rating agencies is just one of the several criteria that we take into account. In addition, we carry out our own analyses. Our very high demands on issuers are also reflected in Group-wide investment principles. The majority of our investments consist of securities issued by issuers with very good credit ratings.

The counterparty credit risk we face is closely monitored and actively managed. In an annual process we analyse our Company's exposure to reinsurance counterparties, especially for ceded business outside of the Munich Re group. Here, we also benefit from the central credit risk assessment processes of MR Group.

### **C.3.3 Material risk concentrations**

Please see chapter C.2 Market risk.

### **C.3.4 Risk reduction techniques**

We control and monitor our counterparty default risks through a Group-wide counterparty limit system. The limits are based on the financial position of the counterparty and on the risk tolerance defined by the Management Board. Counterparty limits are constantly monitored and adjusted if necessary.

### **C.3.5 Stress test and scenario analyses**

Please see chapter C.2 Market risk

## **C.4 Liquidity risk**

### **C.4.1 Risk exposure**

Liquidity risk refers to the risk that a company is unable to meet its financial obligations at maturity due to the lack of fungibility of existing assets.

Considering the short term nature and liquidity characteristics of fixed income portfolio it's reasonable to expect availability of liquid funds even under most severe insurance and market events. Liquidity needs might be significantly increased because of insurance event (extraordinarily big claim) but even in that case the pay-out is not immediate but usually according to previously agreed schedule. Therefore, liquidity risk is of minor importance for the Company.

Additionally there is possibility of liquidity squeeze in the financial markets but considering maturing bonds and high share of liquid government bonds, Company should be in position to meet liquidity demands even under most severe circumstances.

#### **C.4.2 Total amount of the expected profit included in future premiums**

According to Article 260(2) of the Commission Delegate Regulation (EU) 2015/35 the expected profit included in future premiums shall be calculated as the difference between the technical provisions without a risk margin and a calculation of the technical provisions without a risk margin under the assumption that the premiums relating to existing insurance and reinsurance contracts that are expected to be received in the future are not received for any reason other than the insured event having occurred, regardless of the legal or contractual rights of the policyholder to discontinue the policy.

The total amount of expected profits included in future premiums is EUR 2 860 136 , the value has increased during 2017 due to increased profitability as well as portfolio growth.

#### **C.4.3 Measures used for risk assessment**

Finance and Investment department prepares cash flow report on quarterly basis where both liability and asset side cash flows are forecasted for next 12 months. In case significant shortage or excess is foreseen then appropriate steps on asset side is taken in order to meet upcoming demand or surplus.

#### **C.4.4 Material risk concentrations**

There are no material risk concentrations regarding liquidity risks.

#### **C.4.5 Risk reduction techniques**

Liability based investment approach, where duration of liabilities is matched with asset with similar duration, forms also good foundation for reducing liquidity risks. Additionally, fixed income portfolio consist significant part of government and covered bonds with excellent liquidity characteristics.

#### **C.4.6 Stress test and scenario analyses**

No scenarios were explicitly calculated for the liquidity risk this year, as the company's good liquidity position is unlikely to lead to any developments that jeopardize the capitalization of the company.

## **C.5 Operational risk**

### **C.5.1 Risk exposure**

Operational risks are inevitably connected to the Company's business activities. They should to be mitigated or if possible avoided as long as this is economically feasible.

The causes of operational risks are errors in processes, inadequate information and telecommunications technology, external influences, such as natural disasters, and legal risks.

The highest operational risks have been identified in the areas of execution, delivery and process management (errors in data entry, accounting, underwriting, etc.), Internal Fraud (unauthorized activities of employees) and Suitability, Disclosure & Fiduciary (failed mandatory reporting, actions that could cause violation of Data protection, Insurance supervision and Contract law). In addition, single high operational loss events might endanger Company's ability to continue with business operations. These events include errors in reserving and underwriting, internal fraud, business interruption due to system failure or fire and disclosure of confidential data.

### **C.5.2 Measures for risk assessment**

The Company manages the risks which are connected to the business processes with adequate controls in the respective processes and used IT applications. Also the controls and measures on legal entity level guarantees compliance with the regulatory requirements. The functionality of the single controls is guaranteed via the cooperation of the different functions of the 1st to 3rd line of defence and as well via the interlocking of controls on the different levels within the Internal Control System.

The operational risks are assessed both qualitatively and quantitatively. The qualitative assessment is performed during the annual risk and control assessment, where net risks (net after control/mitigation) are compared with a predefined limit system (heat maps) and significant risks are managed as necessary through (further) reduction, transfer and/or intensive monitoring.

The quantitative assessment of the significant operational risks is carried out using a scenario-based approach.

### **C.5.3 Material risk concentrations**

Weaknesses in the control environment, as well as in the central IT systems, can have an impact on the insurance-related operating process and thus have a cumulative impact.

### **C.5.4 Risk reduction techniques**

The Operational Risk management focuses on the following operative elements:

- Resources, especially information and infrastructure (IT and buildings)
- Human Resources and processes
- Projects

We mitigate risks coming from our business processes with controls on process, IT and entity level. Controls on process level can be authorization systems, 4-eyes principle, segregation of duties, guidelines, etc. Examples of IT controls are backup solutions, access controls and

corresponding emergency planning. Entity level controls aim to assess whether the regulatory requirements pertaining to an adequate control environment are fulfilled. All employees are regularly trained.

In addition, Business Continuity Management system ensures the continuity of important business processes and systems in emergency or crisis situations. The goal is to be able to continue with normal business operations within ERGO under such circumstances. This is assured by a well-defined emergency management, a proper set-up of crisis management, and adequate recovery management concepts. The continuity systems are tested regularly.

## **C.6 Other material risks**

### **C.6.1 Strategic Risks**

Strategic risks can result from wrong business decisions or inadequate implementation of decisions already made. Additionally we also reflect the reluctance to adjust to a changing environment (e.g. changes of the legal environment) in the strategic risks.

Despite stable political environment in the Baltic region, potential shifts in regulation and competitive market environment are the key risks that might affect strategy execution:

1. Political environment – political environment in the Baltic States is currently stable.
2. Shifting regulation – current government implementing EU regulation, particularly on Insurance Distribution (IDD) and General Data Protection Regulation (GDPR) require additional resources and dedication for implementation, with no option to delay the implementation due to high fines and reputational impact.
3. Competitive market environment – markets continue to be competitive, although average premium especially in motor lines has increased, insurers will compete on internal efficiency level and costs in order to generate positive UW results. Ongoing market consolidation might lead to loss of competitive market share (importance of scale in the Baltic market).
4. Demographical situation – high migration due to comparably low wages and continuing population aging might trigger a need for different products we offer as well as number of possible clients will decrease constantly.
5. The possible impact to the business model of ERGO by changed customers' behaviour and needs in terms of digitalization.

Strategic risks are addressed by interlocking strategic decision making and risk management processes, especially with regards to preparations and decisions as part of the planning process.

As part of the Management of Strategic Risks' process, top risks are identified, evaluated by the Board of Management and discussed on Board level. If needed, appropriate measures are initiated on Board level. For these risks, a responsible person is defined who is responsible for implementing the measures.

### **C.6.2 Reputational risks**

Reputational risk is the risk that adverse publicity regarding ERGO's business practices and associations, whether accurate or not, will cause loss of confidence in the integrity of the institution. Reputational risks may result from the realization of other risks (e.g. operational,

strategic or concentration risk) and / or in conjunction with other risks, hence, reputational risks are controlled indirectly through the control of the respective risks and risk types.

Reputational risk can occur through a number of ways: directly as the result of the actions of the Company itself; indirectly due to the actions of an employee; or tangentially through other third parties.

ERGO has defined two sub-categories of Reputational risk:

- Data and Information
- Image risks

The reputational risk associated with unauthorized publishing of confidential information is increasing, as society's awareness on disclosure on personal data is growing, also in relation with the implementation of new data protection regulations in EU countries. Large-scale negative publications in media from unsatisfied customers could also significantly affect ERGOs reputation.

The identification process of Reputational risk takes place in three ways:

- ad hoc reporting;
- regular quarterly communication between the Risk Management function and relevant parties such as the Compliance function, Internal Audit or Corporate Communication;
- internal control system, where basic assessment of potential reputational loss for each operational risk takes place.

Respective risk takers define measures including an implementation plan to minimize and steer the risk. Depending on the relevance and materiality, other relevant parties such as the Compliance function or Internal Audit are consulted and informed about the defined measures. As a minimum, measures for the most important reputational risks are discussed and approved by the local Management Board. ERGO Group AG Management Board, Munich Re Management Board or relevant committees are informed about the initiated measures as necessary.

The top reputational risks are incorporated into the risk profile of the Company and reported during the quarterly risk reporting. Ad-hoc reporting processes have been implemented to ensure that (potential) reputational risks are communicated promptly.

The control functions – the Compliance function and the Internal Audit – perform the reputational risk assessment process in accordance with their own methodology and report identified real of presumable reputational risks to the Risk Management function as well as other responsible stakeholders.

### **C.7 Any other information**

There is no any other information.

## D. Valuation for Solvency Purposes

### D.1 Assets

#### D.1.1 Comparison of assets with their Solvency II values and Statutory accounts values

The following table covers information about assets that is to be given in the Quantitative Reporting Template (QRT) S.02.01, i.e. the comparison of assets with their Solvency II values and with their Statutory accounts values, that is for ERGO the IFRS values. Assets in direct conjunction with technical provisions (reinsurance recoverables) are not considered here, but in Chapter D.2.

ASSETS	Solvency II value	IFRS value	Explanations
Deferred acquisition costs	0	7 283 616	Acquisition costs are not shown as an asset in the solvency balance sheet, but are taken into account in the valuation of the technical provisions.
Intangible assets	0	6 115 212	Other intangible assets are only shown in the solvency balance sheet if they are both accounted for in IFRS and traded in an active market. The latter requirement is deemed to be met if an active market exists for similar assets. Since ERGO Insurance SE's intangible assets do not currently meet this requirement, this item in the solvency balance sheet is empty.
Deferred tax assets	241 849	241 849	Deferred tax assets valuation does not differ in SII and IFRS reporting.
Property, plant & equipment held for own use	8 288 721	7 622 945	The difference 695'594 euros is equal to difference between property appraisal and book value. Works of art 29'886 in amount euros are reported in SII on item <i>Any other assets, not elsewhere shown.</i>
<b>Investments (other than assets held for index-linked and unit-linked contracts)</b>	<b>141 411 842</b>	<b>142 165 502</b>	
Holdings in related undertakings, including participations	1 781 282	2 534 979	Participations to affiliated companies are accounted by equity method. The difference 753'697 euros between SII and IFRS values comes from different base values taken for the calculation, because affiliated company's SII and IFRS own funds are not equal.
Equities	43 443	43 443	SII and IFRS values are equal.
<i>Equities - unlisted</i>	43 443	43 443	SII and IFRS values are equal.
Bonds	121 736 833	121 736 796	Financial investments are reported in fair value for both purposes, SII and IFRS. For valuation of bonds issued in USA dollars, different currency rates have been applied, which caused current difference.
<i>Government Bonds</i>	54 497 758	54 497 758	SII and IFRS values are equal.
<i>Corporate Bonds</i>	62 457 037	62 457 000	Financial investments are reported in fair value for both purposes, SII and IFRS. For valuation of bonds issued in USA dollars, different currency rates have been applied, which caused current difference.
<i>Structured notes</i>	4 782 038	4 782 038	SII and IFRS values are equal.
Collective Investments Undertakings	17 850 284	17 850 284	SII and IFRS values are equal.
<b>Loans and mortgages</b>	<b>1 497 457</b>	<b>1 497 457</b>	
<i>Other loans and mortgages</i>	1 497 457	1 497 457	SII and IFRS values are equal.

Insurance and intermediaries receivables	18 100 601	18 060 204	In SII reporting receivables related to reinsurance activities are shown on the item <i>Insurance and intermediaries receivables</i> , not on the item <i>Reinsurance receivables</i> as is common for IFRS. The difference 40'395 euros on both items is caused by that fact. At the end of reporting period discounting of this item has not been required.
Reinsurance receivables	735 969	776 364	At the end of reporting period discounting of this item has not been required.
Receivables (trade, not insurance)	1 151 344	1 169 538	At the end of reporting period discounting of this item has not been required.
Cash and cash equivalents	11 900 068	11 900 068	SII and IFRS values are equal.
Any other assets, not elsewhere shown	1 494 647	1 375 247	Other assets, not elsewhere shown, cover all assets that cannot be allocated in any other class of assets. This includes work of arts and prepayment assets. The difference 89'514 euros comes from one positions, which is reported under SII as prepayment, but under IFRS as receivable. Works of art in amount 29'886 are shown in IFRS on item <i>Property, plant &amp; equipment held for own use</i> . At the end of reporting period discounting of this item has not been required.
<b>Total assets without technical provisions</b>	<b>184 822 498</b>	<b>198 208 002</b>	

According to the Article 75(1)(a) of Directive 2009/138/EC all assets shall be valued at the amount for which they could be exchanged between knowledgeable willing parties in an arm's length transaction, that means with their fair values.

According to IFRS a mixed measurement model is established. That means, some assets are also measured with their fair values, others are measured at amortized costs or with their par values. If the valuation basis for Solvency II and IFRS is the same, we use the same fair values for both purposes. If the valuation basis is different, we explain the differences in more detail for the respective asset classes. Only if differences between the fair values and IFRS values are immaterial, assets are measured with the latter values as explained in more detail below.

In addition to the different valuation methods used for individual items, the structure of the solvency balance sheet also differs from that of the IFRS balance sheet. Not all balance sheet items are therefore directly comparable. The differences are particularly significant for assets shown under investments. In the IFRS balance sheet, loans on policies are included in investments as "loans", whilst under Solvency II they are shown outside investments as a separate item. There are also differences in the classification of receivables and other assets, which are described under the individual items. Where it was possible to reclassify assets as per IFRS in order to comply with the structure prescribed for the solvency balance sheet, we did so.

### D.1.2 Use of judgements and estimates in recognition and measurement

Where valuation has to be based on models because no market prices are available for the calculation of the fair values required, discretion must be exercised and estimates and assumptions used, and these affect both the assets and the other liabilities shown in the solvency balance sheet.

Solvency II amounts should be determined as accurately as possible, taking into account all the relevant information. The basis for determining amounts is management's best knowledge

regarding the items concerned at the reporting date. Nevertheless, it is in the nature of these items that estimates may have to be adjusted in the course of time to take account of new knowledge.

### **D.1.3 Goodwill**

No goodwill is shown in the solvency balance sheet.

Goodwill resulting from the first-time consolidation of subsidiaries is tested for impairment at least annually, in accordance with IAS 36. We additionally carry out ad-hoc impairment tests if there are indications of impairment. For impairment testing, the goodwill is allocated to the cash-generating units or groups of cash-generating units expected to derive benefit from the synergies of the business combination.

### **D.1.4 Deferred Acquisition Costs**

Acquisition costs are not shown as an asset in the solvency balance sheet, but are taken into account in the valuation of the technical provisions.

Whereas under IFRS deferred acquisition costs comprise commissions and other variable costs directly connected with acquisition or renewal of insurance contracts. In life business and long-term health primary insurance, acquisition costs are capitalized and amortized over the duration of the contracts.

The deferred acquisition costs are amortized on a straight-line basis over the average term of the policies, from one to five years.

Deferred acquisition costs are regularly tested for impairment.

### **D.1.5 Intangible assets**

Other intangible assets are only shown in the solvency balance sheet if they are both accounted for in IFRS and traded in an active market. The latter requirement is deemed to be met if an active market exists for similar assets. Since ERGO's intangible assets do not currently meet this requirement, this item in the solvency balance sheet is empty.

The other intangible assets mainly comprise self-developed and other software. Intangible assets are recognised at acquisition or production cost and depreciated on a straight-line basis over their planned useful life.

### **D.1.6 Deferred tax assets**

Deferred income tax is provided for, using the liability method, on all temporary differences arising between the tax bases of assets and liabilities and their carrying amounts in the financial statements. Deferred tax calculations are based on the tax rates effective on the balance sheet date expected to be effective in the periods when the Company will realize the deferred tax asset or settle deferred tax liabilities. The principal temporary differences arise from different property and equipment depreciation rates, as well as from accrued expenses, provisions for doubtful debts and tax losses carried forward.

A deferred tax asset is recognised only to the extent that it is probable that future taxable profits will be available against which the asset can be utilised. The deferred tax assets are reviewed at each reporting date and reduced to the extent it is no longer probable that the related tax benefit will be realized.

Deferred tax assets and liabilities are not discounted. The same deferred tax assets value is used for Solvency II and IFRS purposes.

### **D.1.7 Property, plant & equipment held for own use**

For Solvency II purposes property, plant and equipment held for ERGO own use shall be valued with their fair value. The valuation has to be performed annually. Property is not evaluated by the company itself, but appraisal service is outsourced to professional real estate appraiser.

Two methods can be used for such valuation: Sales Comparison Approach and Income Approach. The selection of a relevant methodology depends upon the nature and characteristics of the real estate under consideration and the market data available.

Choice of the valuation method/approach depends on particular property characteristics and certain market conditions. If the object is suitable for generating of the rental income, the income approach is preferable.

For the purpose of Solvency II plant and equipment is – for reasons of simplification – measured with its IFRS value that means at amortized costs, subject to scheduled depreciation over the course of its useful life in accordance with the decline in its utility to the necessity of unscheduled depreciation to a lower value. The same method is applied in IFRS for property objects.

### **D.1.8 Investments**

#### **Participations**

This item comprises the associates or such entities over which the company has significant influence but not control. Significant influence is presumed to exist when the company holds directly or indirectly through subsidiaries 20-50% of an entity's voting power.

Investments in associates are accounted for using the equity method. Upon initial recognition, investments in associates are measured at cost. The cost of an investment includes directly attributable transaction charges. The financial statements include the company's share of an associate's profit or loss from the date the significant influence commences to the date the significant influence ceases to exist.

In the Solvency II the value of participations has to be either the market price or the proportional amount of the equity of the participation.

#### **Other financial assets**

In the solvency balance sheet, we value all financial assets at fair value. The fair value of a financial instrument is the amount for which a financial asset could be exchanged, or a financial liability settled, between knowledgeable, willing parties in an arm's length transaction.

Where a price is quoted in active markets (i.e. a market value), it should be used. If no market value is available, valuation models are used in which observable market parameters are applied as far as possible. The same valuation principles are followed as under IFRS.

### D.1.9 Determining fair values

Since market values are not available for all financial instruments, IFRS has a valuation hierarchy with three levels. Though Solvency II does not explicitly name the levels, it does provide for equivalent differentiation in the assessment of the fair values used.

The allocation reflects whether a fair value has been derived from transactions in the market or the valuation is based on models because there are no market transactions.

In the case of Level 1, valuation is based on unadjusted quoted prices in active markets for identical financial assets which ERGO can refer to at the balance sheet date. A market is deemed active if transactions take place with sufficient frequency and in sufficient quantity for price information to be available on an ongoing basis. Since a quoted price in an active market is the most reliable indicator of fair value, this should always be used if available. The financial instruments we have allocated to this level mainly comprise equities, investment funds (except property funds) and fixed-interest securities (bearer bonds) for which either a stock market price is available or prices are provided by a price quoter on the basis of actual market transactions. We have also allocated derivatives traded on the stock market to Level 1.

Assets allocated to Level 2 are valued using models based on observable market data. For this, we use inputs directly or indirectly observable in the market, other than quoted prices. If the financial instrument concerned has a fixed contract period, the inputs used for valuation must be observable for the whole of this period. The financial instruments we have allocated to this level mainly comprise borrowers' note loans, pfandbriefs, subordinated securities and derivatives not traded on the stock market.

For assets allocated to Level 3, we use valuation techniques not based on inputs observable in the market. This is only permissible insofar as no observable market data are available. The inputs used reflect ERGO Insurance's assumptions regarding the factors which market players would consider in their pricing. We use the best available information for this, including internal company data. The financial instruments allocated to this level of the fair value hierarchy largely comprise investments in private equity, renewable energy and new technologies (RENT), certain credit structures, and investments in affiliated companies and associates measured at fair value. We also allocate insurance derivatives and derivative components that are separated from the host insurance contract to Level 3. Regularly, at each quarterly reporting date, we assess whether the allocation of our investments and liabilities to the levels of the valuation hierarchy is still appropriate. If changes in the basis of valuation have occurred – for in-stance, if a market is no longer active or the valuation was performed using parameters that make it necessary to change the allocation – we make the necessary adjustments.

### D.1.10 Valuation categories according to IFRS

Unlike in the solvency balance sheet, for IFRS assets are classified into four categories, depending on the purpose of acquisition:

- financial assets at fair value through profit or loss;
- loans and receivables
- held-to-maturity investments;
- available-for-sale financial assets.

Financial assets at fair value through profit or loss are financial assets which on initial recognition are designated as at fair value through profit or loss.

Derivatives are classified as held for trading and are designated as at fair value through profit or loss unless they are designated and used as effective hedging instruments.

Held-to-maturity investments are non-derivative financial assets with fixed or determinable payments and fixed maturities which the company intends and is able to hold to maturity.

Loans and receivables are non-derivative financial assets with fixed determinable payments that are not quoted in an active market.

Available-for-sale financial assets are non-derivative financial assets that are either designated to this category or are not classified to any of the other categories.

Purchases of financial assets are recognised at the settlement date. A financial asset is derecognised when contractual rights to receive cash flows from the asset expire, or where the asset, together with substantially all the risks and re-wards of ownership, has been transferred.

Financial assets are initially measured at their fair value. After initial recognition, the company measures financial assets at fair value through profit or loss and available-for-sale financial assets at their fair value, without any deduction for the transaction costs it may incur on disposal. The fair value of a quoted financial asset is its quoted bid price at the reporting date. If the market for a financial asset is not active, the company determines fair value using valuation techniques. These include the use of recent arm's length market transactions, references to another instrument that is substantially the same, discounted cash flow analysis and option pricing models. If the value of equity instruments cannot be measured reliably, they are measured at cost.

Held-to-maturity investments are measured at amortised cost less impairment losses using the effective interest method. Loans and receivables are measured at amortised cost using the effective interest rate method.

The effective interest rate is the rate that exactly discounts estimated future cash payments or receipts through the expected life of the financial instrument to the net carrying amount of the financial asset or liability. When calculating the effective interest rate, cash flows are estimated considering all contractual terms of the financial instrument excluding future credit losses. The calculation includes all fees paid or received between parties to the contract, direct transaction costs, and all other premiums or discounts.

Realised gains and losses and unrealised gains and losses arising from changes in the fair value of financial assets at fair value through profit or loss are recognised in the income statement in the period in which they arise. Unrealised gains and losses arising from changes in the fair value of available-for-sale financial assets are recognised directly in other comprehensive income or expense. When available-for-sale financial assets are sold or become impaired, the cumulative gains or losses previously recognised in other comprehensive income or expense are recognised in the income statement. Where these investments are interest-bearing, the interest income calculated using the effective interest rate method is recognised in the income statement.

As the deposits with banks mainly have a period to maturity of less than one year, the fair values largely correspond to the carrying amounts.

### **D.1.11 Impairment**

For IFRS at each balance sheet date, we assess whether there is any substantial objective evidence of impairment in a financial asset or group of financial assets. Impairments in value are recognised as an expense in the income statement. IAS 39.59 contains a list of factors providing substantial objective evidence of impairment of such financial assets. In addition, IAS 39.61 states that for equity investments, a significant or prolonged decline in the fair value of the investment below its acquisition cost is objective evidence of impairment. These rules are given more concrete form by means of internal guidelines. For equities quoted on the stock exchange, we assume a significant decline in fair value if the market value at the re-view date is at least 20% below the average purchase price or has been lower than this amount for at least six months.

In the case of fixed-interest securities and loans, the main basis for establishing impairment is an indication of substantial financial difficulty on the part of the issuer, the current market situation or media reports on the issuer.

We determine acquisition cost on the basis of the average purchase price. In the case of an impairment, a write-down is made to the fair value at the balance sheet date, i.e. generally the publicly quoted market price. If there is a further fall in the fair value of equity investments that have already been written down once, a further write-down recognised in the income statement is made again immediately. Such impairments recognised in profit or loss may not be reversed through profit or loss. If, in a subsequent period, the reasons for the impairment of fixed-interest securities or loans cease to apply, the impairment is reversed, with impact on the income statement. The resultant carrying amount may not exceed the original amortised cost.

As all assets in the solvency balance sheet are shown at fair value, no impairment rules are required. For the same reason, no unbundling or hedge-accounting rules are necessary either.

### **D.1.12 Insurance & intermediaries receivables**

In the solvency balance sheet Insurance & intermediaries receivables have to be measured with their fair values; compared to investments no special requirements have to be considered.

Insurance and intermediaries receivables have to be discounted, taking into account the actual risk free interest rates as well as relevant interest rate spreads. The individual business partner's credit risk is also considered. Receivables aged less than one year should not be discounted.

For IFRS insurance & intermediaries receivables is recognised at face value. Regular aging analysis is performed based on the time buckets (0-30 days old, 31-60 days old, 61-90 days old and older than 90 days), in case if receivable falling into time bucket older than 90 days, it should be written down immediately.

### **D.1.13 Reinsurance receivables**

In the solvency balance sheet reinsurance receivables have to be measured with their fair values; compared to investments, no special requirements have to be considered. Reinsurance receivables have to be discounted, taking into account the actual risk free interest rates as well as relevant interest rate spreads. The individual business partner's credit risk is also considered. Receivables aged less than one year should not be discounted.

For IFRS reinsurance receivables is recognised at face value. Regular aging analysis is performed based on the time buckets (0-30 days old, 31-60 days old, 61-90 days old and older than 90 days), in case if receivable falling into time bucket older than 90 days, it should be written down immediately.

Both reinsurance receivables and insurance & intermediaries receivables are included in other receivables under IFRS, but shown as separate items in the solvency balance sheet. Additionally, under Solvency II all insurance contracts are to be assigned to the technical provisions irrespective of the level of insurance risk in individual contracts. Therefore, receivables resulting from reinsurance contracts without significant risk transfer, which do not fall within the scope of IFRS 4, are – notwithstanding IFRS – not reported as receivables, but as part of the technical provisions.

#### **D.1.14 Receivables (trade, not insurance)**

Under Solvency II, the Receivables (trade, not insurance) include in particular Receivables from dividends, Receivables from profit pooling or transfer agreements, receivables from taxes or other receivables. Basically, these receivables have to be measured with their fair values. However, for reasons of simplification, receivables from dividends and receivables from profit pooling or transfer agreements are measured at their IFRS book value, i.e. at amortised costs. Doubtful receivables are written down to the envisaged amount attainable.

Receivables (trade, not insurance) have to be discounted, taking into account the actual risk free interest rates as well as relevant interest rate spreads. The individual business partner's credit risk is also considered. Receivables aged less than one year should not be discounted.

For IFRS receivables is recognised at face value. Regular aging analysis is performed based on the time buckets (0-30 days old, 31-60 days old, 61-90 days old and older than 90 days), in case if receivable falling into time bucket older than 90 days, it should be written down immediately.

#### **D.1.15 Cash and cash equivalents**

For the purpose of Solvency II, for cash the fair value is the par value. Transferable deposits (including cheques) are valued at amortized cost (usually this is the par value). Credit risk is considered by write off of doubtful deposits and doubtful cheques to the envisaged amount attainable. For IFRS, we show cash held at face value.

#### **D.1.16 Any other assets, not elsewhere shown**

Other assets, not elsewhere shown, cover all assets that cannot be allocated in any other class of assets. This includes work of arts and prepayment assets. In contrast to our Financial Reporting, in the solvency balance sheet activated deferred premium refunds are included in the valuation of the technical provisions.

As a basic principle, under Solvency II all other assets are to be measured with their fair values. However, similarly to IFRS, prepayments are calculated pro rata temporis and cover the period between the reporting date and the date the corresponding benefit is earned or becomes due. Contrary to IFRS, the prepayments are discounted, taking into account the actual relevant risk free interest rate as well as relevant interest rate spreads, unless the effect from discounting is immaterial.

## D.2 Technical provisions

### D.2.1 Value of Technical provisions

ERGOs technical provision values as at 31.12.2017 are set out in the table below.

<i>in Euros</i>	<b>Solvency II value</b>	<b>IFRS value</b>
Technical provisions – non-life	107 178 963	123 481 770
Technical provisions – non-life (excluding health)	103 052 763	118 265 261
<i>TP calculated as a whole</i>	0	0
<i>Best Estimate</i>	99 445 788	0
<i>Risk margin</i>	3 606 975	0
Technical provisions - health (similar to non-life)	4 126 200	5 216 509
<i>TP calculated as a whole</i>	0	0
<i>Best Estimate</i>	3 867 642	0
<i>Risk margin</i>	258 557	0
Technical provisions - life (excluding index-linked and unit-linked)	10 854 999	10 762 259
Technical provisions - health (similar to life)	0	0
<i>TP calculated as a whole</i>	0	0
<i>Best Estimate</i>	0	0
<i>Risk margin</i>	0	0
Technical provisions – life (excluding health and index-linked and unit-linked)	10 854 999	0
<i>TP calculated as a whole</i>	0	0
<i>Best Estimate</i>	10 762 259	0
<i>Risk margin</i>	92 740	0
Technical provisions – index-linked and unit-linked	0	0
<i>TP calculated as a whole</i>	0	0
<i>Best Estimate</i>	0	0
<i>Risk margin</i>	0	0

Life insurance technical provisions in above table stem only from Motor Third Party Liability annuities, non-life insurance technical provisions are further split into lines of business as in the following table.

<i>in Euros</i>	<b>Solvency II Best Estimate</b>	<b>Risk Margin</b>	<b>Solvency II Technical provision</b>
Medical expense insurance	1 344 152	85 591	1 429 744
Income protection insurance	2 523 490	172 966	2 696 456
Motor vehicle liability insurance, excl. annuities	57 427 483	1 637 075	59 064 558
Other motor insurance	20 723 146	962 010	21 685 156
Marine, aviation and transport insurance	639 418	36 876	676 294
Fire and other damage to property insurance	12 325 528	706 316	13 031 845
General liability insurance	6 668 299	168 470	6 836 769
Credit and suretyship insurance	657 471	28 915	686 386
Legal expense insurance	472 003	34 036	506 038
Assistance	532 440	33 276	565 717
<b>Total</b>	<b>103 313 431</b>	<b>3 865 532</b>	<b>107 178 963</b>

The value for reinsurance recoverables as at 31.12.2017 is set out below.

<i>in Euros</i>	<b>Solvency II value</b>	<b>IFRS value</b>
Reinsurance recoverables from:	6 911 262	8 948 185
Non-life and health similar to non-life	5 383 789	7 367 277
Non-life excluding health	5 357 215	7 300 235
Health similar to non-life	26 574	67 041
Life and health similar to life, excluding health and index-linked and unit-linked	1 527 473	1 580 908
Health similar to life	0	0
Life excluding health and index-linked and unit-linked	1 527 473	1 580 908
Life index-linked and unit-linked	0	0

## D.2.2 Overall requirements for technical provisions

Insurance and reinsurance undertakings have to establish technical provisions with respect to all of their insurance and reinsurance obligations towards policy holders and beneficiaries of insurance or reinsurance contracts. The value of technical provisions shall correspond to the current amount insurance and reinsurance undertakings would have to pay if they were to transfer their insurance and reinsurance obligations immediately to another insurance or reinsurance undertaking. The calculation of technical provisions shall make use of and be consistent with information provided by the financial markets and generally available data on underwriting risks (market consistency). Technical provisions shall be calculated in a prudent,

reliable and objective manner. Following the principles set out above, the calculation of technical provisions is carried out as described below.

### **D.2.3 Calculation of technical provisions**

In general, the value of Solvency II technical provisions is equal to the sum of a best estimate and a risk margin as set out below.

The best estimate corresponds to the probability-weighted average of future cash-flows, taking account of the time value of money (expected present value of future cash-flows), using the relevant risk-free interest rate term structure. The calculation of the best estimate is based upon up-to-date and credible information and realistic assumptions and performed using adequate, applicable and relevant actuarial and statistical methods. The cash-flow projection used in the calculation of the best estimate takes account of all the cash in- and out-flows required to settle the insurance and reinsurance obligations over the lifetime thereof. The best estimate is calculated gross, without deduction of the amounts recoverable from reinsurance contracts and special purpose vehicles. Those amounts are calculated separately.

The risk margin is such as to ensure that the value of the technical provisions is equivalent to the amount that insurance and reinsurance undertakings would be expected to require in order to take over and meet the insurance and reinsurance obligations. Where the best estimate and the risk margin are valued separately, the risk margin is calculated by determining the cost of providing an amount of eligible own funds equal to the Solvency Capital Requirement necessary to support the insurance and reinsurance obligations over the lifetime thereof. The rate used in the determination of the cost of providing that amount of eligible own funds (Cost-of-Capital rate) is the prescribed rate.

### **D.2.4 Valuation of financial guarantees and contractual options included in insurance and reinsurance contracts**

In general, when calculating technical provisions, the value of financial guarantees and contractual options included in insurance and reinsurance policies are taken into account. Any assumptions made with respect to the likelihood that policyholders will exercise contractual options, including lapses and surrenders, are realistic and based on current and credible information. The assumptions take account, either explicitly or implicitly, of the impact that future changes in financial and non-financial conditions may have on the exercise of those options.

### **D.2.5 Segmentation**

We segment our insurance and reinsurance obligations into homogeneous risk groups, and as a minimum by lines of business, when calculating technical provisions.

### **D.2.6 Uncertainty Associated with the Amount of Technical Provisions**

The estimation of technical provisions is subject to uncertainty due to the fact that the settlement of claims that have arisen before the balance sheet date is dependent on future events and developments. Unforeseen loss trends resulting from court rulings, changes in the law, differences in loss adjustment practice, medical and long-term care, and economic factors such as inflation can have a considerable impact on run-off results.

We calculate the technical provisions for losses and claims settlement costs in accordance with actuarial practice based on substantiated assumptions, methods and assessments. The assumptions are regularly reviewed and updated. Application of Group-wide reserving rules guarantees a substantially reliable and consistent procedure. In addition, internal audits are carried out Group-wide to verify compliance with these rules and the appropriateness of the technical provisions.

The uncertainty in technical provisions is further analysed by stressing certain assumptions and parameters in the calculations. In addition, we define and monitor scenarios that have the potential to impact the level of technical provisions significantly. Our technical provisions reflect the outcome of these analyses.

#### **D.2.7 Financial statements: Application of International Financial Reporting Standards (IFRS)**

ERGOs financial statements meet the requirements of IFRS.

#### **D.2.8 Financial statements: Recognition and measurement of gross technical provisions**

The technical provisions are shown as gross figures in the balance sheet, i.e. before deduction of the ceded share. The ceded share is calculated and accounted for on the basis of the individual reinsurance agreements. Acquisition costs for insurance contracts are capitalised and amortised over the terms of the contracts. The actuarial assumptions are adjusted if this is shown to be necessary by a liability adequacy test in accordance with IFRS 4.

Unearned premiums are accrued premiums already written for future risk periods. For primary insurance, these premiums are calculated separately for each insurance policy pro rata temporis; for reinsurance, nominal percentages are used in some cases where the data for a calculation pro rata temporis are not available.

The provision for outstanding claims is for payment obligations arising from insurance contracts in primary insurance and reinsurance where the size of the claim or the timing of the payment is still uncertain. Part of the provision is for known claims for which individually calculated provisions are posted. Another part is for expenses for claims whose occurrence is not yet known (e.g. because they have not been reported yet or have not yet manifested themselves). A third class of provisions covers claims which are known but whose extent has turned out to be different than originally foreseen. Expenses for internal and external loss adjustment expenses are included.

The provision for outstanding claims is based on estimates: the actual payments may be higher or lower. The amounts posted are the realistically estimated future amounts to be paid; they are calculated on the basis of past experience and assumptions about future developments (e.g. social, economic or technological factors). Future payment obligations are generally not discounted; exceptions are annuities stemming from property-casualty lines of business, which we discount. For determining the provision for outstanding claims, ERGO uses a range of actuarial projection methods, including the chain ladder and the Bornhuetter-Ferguson method. In applying the statistical methods, we regard large exposures separately. The standard actuarial methods we use are applied both to the run-off triangles for the payments and to the run-off triangles for the reported claims, so that we obtain a range of estimates for

the ultimate loss. Within this range, a realistic estimated value for the ultimate loss is determined.

All technical provisions are regularly subjected to a liability adequacy test in accordance with IFRS 4. If current experience shows that the provisions posted on the basis of the original assumptions – less the related deferred acquisition costs and the present value of the related premiums – are inadequate to cover the expected future benefits, we adjust the relevant technical provisions with recognition in profit or loss and disclose this under impairment losses/unscheduled changes in the notes to the consolidated balance sheet. The appropriateness of unearned premiums and of the provision for outstanding claims is assessed in relation to the realistically estimated future amount to be paid. The appropriateness of the provision for future policy benefits is assessed on the basis of realistic estimates of the actuarial assumptions, the proportional investment result and, for contracts with participation in surplus, the future profit sharing.

#### **D.2.9 Financial statements: Recognition and measurement of deferred acquisition costs**

Deferred acquisition costs comprise commissions and other variable costs directly connected with acquisition or renewal of insurance contracts. In property-casualty business and short-term health primary insurance, the deferred acquisition costs are amortised on a straight-line basis over the average term of the policies. Deferred acquisition costs are regularly tested for impairment using a liability adequacy test as per IFRS 4.

#### **D.2.10 Financial Statements: Recognition and Measurement of Ceded Share of Technical Provisions**

The share of technical provisions for business ceded is determined from the respective technical provisions in accordance with the terms of the reinsurance agreements.

#### **D.2.11 Explanation of the qualitative differences between the methodologies used for valuation for solvency purposes and those used for valuation in financial statements**

##### **Definition and scope**

Under Solvency II the best estimate for non-life insurance obligations is calculated separately for the premium provision and for the provision for claims outstanding. The premium provision differs significantly from the IFRS Unearned Premium Reserve described in D.2.8. The premium provision relates to future claim events covered by insurance and reinsurance obligations falling within the defined contract boundary. Similarly to IFRS, the provision for claims outstanding relates to claim events that have already occurred, regardless of whether the claims arising from those events have been reported or not.

In line with Solvency II, technical provisions and reinsurance recoverables are established for all (re)insurance contracts independent of the level of insurance risk underlying a particular contract. That means Solvency II covers all business including products or contracts which do not meet the definition of insurance contract under IFRS.

##### **Contract boundary**

When valuating technical provisions under Solvency II, Company has to include obligations relating to existing (re)insurance business and exclude obligations relating to future business.

The contract boundary is defined by policyholder's options to establish, renew, extend, increase or resume the (re)insurance cover and Company's options to terminate the contract or amend premiums or benefits.

There are no specific differences against IFRS with respect to the boundary for the determination of unpaid claim costs and claims adjustment expenses after insured events occur. There are differences against financial statements about what is considered existing or future business.

There might be cases where Company's processes lead to a differing contract boundary compared to Solvency II requirements. The impact of those differences is not material.

### **Discounting**

Under IFRS the provision for outstanding claims is generally not discounted; exceptions are annuities stemming from property-casualty business lines of business, which are discounted. Unearned premiums are not discounted.

Under Solvency II technical provisions are discounted. Company uses the risk-free interest rates depending on currency and maturity published by EIOPA when discounting technical provisions.

Matching adjustment referred to in Article 77b of Directive 2009/138/EC is not used.

Volatility adjustment referred to in Article 77d of Directive 2009/138/EC is not used.

Transitional risk-free interest rate-term structure referred to Article 308c of Directive 2009/138/EC is not used.

Transitional deduction referred to in Article 308d of Directive 2009/138/EC is not used.

### **Risk margin**

Solvency II prescribes an explicit risk margin as a part of technical provisions. By contrast, actuarial assumptions in line with IFRS include adequate provision for adverse deviation to make allowance for the risks of change, error and random fluctuations. In particular, no explicit risk margin is calculated.

The general principle for the calculation of the risk margin assumes that the whole portfolio of insurance and reinsurance obligations of the entity that calculates the risk margin (the original entity) is taken over by another undertaking. It is required to calculate the risk margin separately for the portfolio of insurance obligations related to life and to non-life activities.

In particular, the risk margin should cover underwriting risk, credit risk with respect to reinsurance contracts, arrangements with special purpose vehicles, intermediaries, policy holders and any other material exposures which are closely related to the insurance and reinsurance obligations, and operational risk. The risk margin is calculated by projecting the SCR under a 1-year risk horizon, covering the above risk categories, by using suitable risk drivers. The present value of the total SCR requirements is then multiplied with a cost of capital rate of 6%. The allocation of the risk margin to lines of business takes fair account of the cause of risk capital cost, by considering both the inherent risk drivers of the SCR and the best estimate technical provisions.

Company uses a simplified calculation of the risk margin as described in Article 58 of the Commission Delegate Regulation (EU) 2015/35.

### **Non-performance risk**

While the methodology to determine the allowance for credit risk when calculating the ceded share of technical provisions (i.e. reinsurance recoverables in terms of Solvency II) is not prescribed under IFRS, we comply with the Solvency II requirements for the determination of the counterparty default adjustment.

### **Acquisition costs**

According to IFRS, acquisition costs for insurance contracts are capitalised and amortised over the terms of the contracts. Under Solvency II acquisition costs are taken into consideration when calculating technical provisions.

#### **D.2.12 General requirements for the calculation of reinsurance recoverables**

The calculation of amounts recoverable from reinsurance contracts and special purpose vehicles by insurance and reinsurance undertakings shall comply with the rules relating to technical provisions. The amounts recoverable from reinsurance contracts and special purpose vehicles shall be calculated consistently with the boundaries of the underlying insurance or reinsurance contracts to which they relate.

A separate calculation shall be carried out for the amounts recoverable from reinsurance contracts and special purpose vehicles for non-life insurance obligations regarding premium provisions and provisions for claims outstanding. The cash-flows relating to provisions for claims outstanding shall include the compensation payments relating to the claims accounted for in the gross provisions for claims outstanding of the insurance or reinsurance undertaking ceding risks. The cash-flows relating to premium provisions shall include all other payments. For the purpose of calculating the amounts recoverable from reinsurance contracts and special purpose vehicles, the cash-flows shall only include payments in relation to compensation of insurance events and unsettled insurance claims. Payments in relation to other events or settled insurance claims shall be accounted for outside the amounts recoverable from reinsurance contracts and special purpose vehicles and other elements of the technical provisions. Where a deposit has been made for the cash-flows, the amounts recoverable shall be adjusted accordingly to avoid a double counting of the assets and liabilities relating to the deposit.

When calculating amounts recoverable from reinsurance contracts and special purpose vehicles, insurance and reinsurance undertakings shall take account of the time difference between recoveries and direct payments.

The Company does not use any special purpose vehicles within the meaning of Directive 2009/138 / EC of the European Parliament and of the Council.

#### **D.2.13 Counterparty default adjustment**

The result from the calculation of the best estimate shall be adjusted to take account of expected losses due to default of the counterparty. That adjustment shall be based on an

assessment of the probability of default of the counterparty and the average loss resulting therefrom (loss-given-default).

The adjustment to take account of expected losses due to default of the counterparty shall be calculated as the expected present value of the change in cash-flows underlying the amounts recoverable from that counterparty, resulting from a possible default of the counterparty, including insolvency or dispute, at a certain point in time. For this purpose, the change in cash-flows shall not take into account the effect of any risk mitigating technique that mitigates the credit risk of the counterparty. These risk mitigating techniques shall be separately recognised as an asset, without increasing the amount recoverable from reinsurance contracts and special purpose vehicles.

The calculation shall take into account possible default events over the lifetime of the reinsurance contract or arrangement with the special purpose vehicle and the dependence on time of the probability of default. It shall be carried out separately by each counterparty and each line of business, and in non-life insurance also separately for premium provisions and provisions for claims outstanding.

Company uses a simplified calculation of the counterparty default adjustment as described in Article 61 of the Commission Delegate Regulation (EU) 2015/35.

#### **D.2.14 Management actions**

Management actions are implemented as rules that reflect management discretion. The aim is to model potential management decisions realistically under various scenarios.

ERGO belongs to the Munich Re Group. A Manual of Methods for Technical Provisions ensures consistent valuation approaches throughout Munich Re Group. The technical provisions are calculated using established principles for actuarial valuation. In this context, requirements regarding segmentation of business, data used, economic and non-economic assumptions as well as methods and models are set out.

Management actions that have a potential to influence technical provisions include setting a reinsurance strategy. Company's management has taken a balanced and stable approach to reinsurance and drastic changes are not assumed.

#### **D.2.15 Material changes in the assumptions made in the calculation of technical provisions compared to the previous reporting period**

During 2017 Solvency II Best Estimate assumptions were reviewed in both the outstanding claims and the premium provisions. In the outstanding claims provisions the cash-flow patterns were reviewed. In the premium provision the assumptions about future claims, expenses and lapses were reviewed.

During 2017 the provision for outstanding claims without the reinsurance impact changed by less than 1,0 million Euros, the premium provision increased by 8,7 million Euros impacted by the portfolio growth.

### D.3 Other liabilities

#### D.3.1 Comparison of other liabilities with their Solvency II values and Statutory accounts values

The following table covers information about other liabilities that is to be given in the Quantitative Reporting Template (QRT) S.02.01, i.e. the comparison of other liabilities with their Solvency II values and with their Statutory accounts values, that is for ERGO the IFRS values.

OTHER LIABILITIES	Solvency II values	IFRS values	Explanations
Insurance & intermediaries payables	8 788 287	8 609 239	At the end of reporting period discounting of this item has not been required. The difference between SII and IFRS data comes from the differences in presentation. For example, the difference 12'866 euros is caused by the fact that payables related to reinsurance activities is shown in IFRS on the item <i>Insurance &amp; intermediaries payables</i> , not on item <i>Reinsurance payables</i> as is common for IFRS; provision for commission's payable 250'534 euros and payables to traffic foundation 84'352 euros are shown in IFRS on the item Payables (trade, not insurance).
Reinsurance payables	2 419 587	2 739 769	At the end of reporting period discounting of this item has not been required. The difference between SII and IFRS data comes from the differences in presentation. Under IFRS on this item reported ceded part of Deferred acquisition costs in amount 307'316 euros.
Payables (trade, not insurance)	7 104 211	7 480 458	At the end of reporting period discounting of this item has not been required. The difference between SII and IFRS data comes from the differences in presentation.
Subordinated liabilities	6 210 063	6 000 000	
Subordinated liabilities not in Basic Own Funds	210 063	0	Interest payable 210'063 euros is shown under IFRS on item <i>Payables (trade, not insurance)</i> .
Subordinated liabilities in Basic Own Funds	6 000 000	6 000 000	SII and IFRS values are equal.
<b>Total other liabilities</b>	<b>24 522 148</b>	<b>24 829 466</b>	

According to Article 75(1) (b) of Directive 2009/138/EC all the other liabilities shall be valued at the amount for which they could be transferred, or settled, between knowledgeable willing parties in an arm's length transaction, that means with their fair values. When valuing liabilities, no adjustment to take account of the own credit standing of the insurance or reinsurance undertaking shall be made. As in general the valuation basis for Solvency II and IFRS is different, we explain the differences in more detail for the respective liabilities classes below. Only if differences between the fair values and IFRS values are immaterial, the other liabilities are measured with the latter values as explained in more detail below.

The statutory accounts of the undertaking (financial statements prepared under local requirements) shall be reported in the format of Solvency II. Therefore items of the statutory financial statements shall be classified into the Solvency II split where possible.

### **D.3.2 Provisions other than technical provisions**

Both in the solvency balance sheet and for IFRS, we produce a best estimate of the sum that would be required to settle the liabilities as at the balance sheet date, which is the amount we would reasonably have to pay to satisfy them or transfer them to a third party as at the balance sheet date. If there is a range of possible estimates having an equal degree of probability, the mid-point of the range is used. If the interest rate is a material factor, we value the provision at the present value of the expected expenditure, and if it is immaterial, we disregard it for Solvency II purposes.

#### **D.3.3 Financial liabilities**

##### **Insurance & intermediaries payables**

Under Solvency II, insurance & intermediaries payables must be recognised at fair value, for IFRS, at the amount actually required to redeem or settle them.

##### **Reinsurance payables**

Under Solvency II, reinsurance payables must be recognised at fair value, for IFRS, at the amount actually required to redeem or settle them.

Both reinsurance payables and insurance & intermediaries payables are included in other payables under IFRS, but shown as separate items in the solvency balance sheet. Additionally, under Solvency II all insurance contracts are to be assigned to the technical provisions irrespective of the level of insurance risk in individual contracts. Therefore, payables resulting from insurance or reinsurance contracts without significant risk transfer, are – notwithstanding IFRS – not reported as payables, but as part of the technical provisions.

##### **Payables (trade, not insurance)**

In the Solvency balance sheet the item Payables (trade, not insurance) covers in particular Payables from dividends, Payables from profit pooling or transfer agreements, and Payables from taxes as well as other Payables. Thus, payables (trade, not insurance) shall be measured at their reporting date fair value without taking into account any upsides or downsides for the own credit risk of the undertaking. However, for reasons of simplification, payables from dividends and payables from profit pooling or transfer agreements are measured at their IFRS book value, i.e. at amortised costs.

Payables from taxes and other receivables are discounted, taking into account the actual risk free interest rates as well as relevant interest rate spreads. However, the undertaking's own credit risk must not be considered.

#### **D.3.4 Any other liabilities, not elsewhere shown**

Other liabilities, not elsewhere shown, cover all liabilities that cannot be allocated in any other class of liabilities. As a basic principle, under Solvency II, all other liabilities have to be measured with their fair values. For IFRS such liabilities is recognised at the amount actually required to redeem or settle them.

#### **D.5 Any other information**

There is no any other information

## E. Capital Management

### E.1 Own funds

#### E.1.1 Differences between IFRS equity and SII excess of assets over liabilities

Material differences between equity shown in ERGO IFRS financial statements and excess of assets over liabilities as calculated for Solvency II purposes arise from differing rules and regulations for valuation and consideration of balance sheet items.

As per Solvency II methodology, fair value principles are applied comprehensively. This means, either a market value is available and applicable (e.g. investments), or a predefined approach determines the fair value of assets and liabilities without an active market (e.g. best estimate and risk margin for technical provisions). The time value of money is taken into account under Solvency II and requires the discounting of cash flows, which is only the case for selected technical provisions in IFRS. In contrast to the IFRS balance sheet, the Solvency II balance sheet does not include any claims equalisation provisions.

In consequence, IFRS equity and SII excess of assets over liabilities differ due to differing total balances for assets as well as liabilities in a Solvency II compliant balance sheet and an IFRS balance sheet.

<b>Excess of assets over liabilities - attribution of valuation differences</b>	<b>31.12.2017</b>	<b>31.12.2016</b>
Total of reserves and retained earnings from financial statements	48 082 694	44 317 734
Difference in the valuation of assets	-15 422 429	-15 078 013
Difference in the valuation of technical provisions	16 210 067	13 447 943
Difference in the valuation of other liabilities	307 318	498 567
<b>Solvency II Excess of assets over liabilities</b>	<b>49 177 650</b>	<b>43 186 231</b>

#### E.1.2 Composition of own funds

In the following table presented information on the structure, amount and quality of the available own funds at the end of the reporting period:

<b>Basic own funds</b>	<b>31.12.2017</b>	<b>31.12.2016</b>	<b>Tier classification</b>
Ordinary share capital (gross of own shares)	6 391 391	6 391 391	Tier 1 - unrestricted
Reconciliation reserve	42 544 410	35 631 158	Tier 1 - unrestricted
Subordinated liabilities	6 000 000	6 000 000	Tier 2
Net deferred tax assets	241 849	1 163 682	Tier 3
<b>Total basic own funds</b>	<b>55 177 650</b>	<b>49 186 231</b>	

## E.2 Solvency Capital Requirement and Minimum Capital Requirement

ERGO discloses and safeguards the regulatory needed capitalisation based on the Standard Formula.

### E.2.1 Values of Solvency Capital Requirement and Minimum Capital Requirement

The following table shows the Company's Solvency II Capital Requirement (SCR) composition:

<i>In Euros</i>	<b>Value 31.12.17</b>	<b>Value 31.12.16</b>
Market risk	5 016 051	5 369 731
Counterparty default risk	4 824 533	4 109 006
Life underwriting risk	291 076	202 729
Health underwriting risk	2 695 055	2 425 942
Non-life underwriting risk	36 234 683	29 836 075
Diversification	-8 298 486	-7 763 455
Intangible asset risk	-	-
<b>Basic Solvency Capital Requirement</b>	<b>40 762 913</b>	<b>34 180 028</b>
Operational risk	4 629 782	3 913 328
Loss-absorbing capacity of deferred taxes	-	-
<b>Net Solvency Capital Requirements (SCR)</b>	<b>45 392 695</b>	<b>38 093 356</b>

Minimum Capital Requirement (MCR) is calculated as a maximum of two components: combined MCR and the absolute floor referred to in Article 129(1)(d) of Directive 2009/138/EC. The combined MCR shall be equal to the Linear MCR but not more than 45% of SCR and not less than 25% of SCR.

The Linear MCR is calculate separately for life and non-life obligations and added. For non-life the calculation depends on written premiums and technical provisions without the risk margin, for life technical provisions and capital at risk as described in Articles 250 and 251 of the Commission Delegate Regulation (EU) 2015/35.

The following data is used for Linear MCR calculations:

<i>in Euros</i>	<b>Net technical provision s</b>	<b>Net written premiums</b>	<b><math>\alpha</math></b>	<b><math>\beta</math></b>	<b>Linear MCR</b>
Medical expenses insurance	1 289 240	3 830 676	4,7%	4,7%	240 636
Income protection insurance	2 551 828	6 440 667	13,1%	8,5%	881 746
Motor vehicle liability	52 958 864	67 753 563	8,5%	9,4%	10 870 338
Motor, other classes	20 923 069	44 743 695	7,5%	7,5%	4 925 007
Marine, aviation, transport (MAT)	645 325	1 794 286	10,3%	14,0%	317 669
Fire and other property damage	12 766 304	24 676 130	9,4%	7,5%	3 050 742
Third-party liability	5 375 183	4 789 363	10,3%	13,1%	1 181 050
Credit and suretyship	415 386	1 212 374	17,7%	11,3%	210 522
Legal expense insurance	472 003	1 455 868	11,3%	6,6%	149 424
Assistance	532 440	1 664 124	18,6%	8,5%	240 484
					<b>22 067</b>
<b>Total Linear MCR for non-life obligations</b>					<b>619</b>
Linear MCR for life obligations	9 234 786		2,10%		193 931
					<b>22 261</b>
<b>Total Linear MCR</b>					<b>549</b>

The value of Minimum Capital Requirement (MCR) is shown below:

<i>In Euros</i>	<b>Value 31.12.17</b>	<b>Value 31.12.16</b>
Linear MCR	22 261 549	18 706 888
SCR	45 392 695	38 093 356
MCR cap	20 426 713	17 142 010
MCR floor	11 348 174	9 523 339
Combined MCR	20 426 713	17 142 010
Absolute floor of the MCR	3 700 000	3 700 000
<b>Minimum Capital Requirement (MCR)</b>	<b>20 426 713</b>	<b>17 142 010</b>

The following table shows that ERGO is sufficiently covered under Solvency II:

<i>In Euros</i>	<b>Value 31.12.17</b>	<b>Value 31.12.16</b>
SCR	45 392 695	38 093 356
MCR	20 426 713	17 142 010
Eligible Own Funds for SCR coverage	55 177 650	49 186 231
Eligible Own Funds for MCR coverage	53 021 143	45 450 951
<b>SCR Coverage</b>	<b>122%</b>	<b>129%</b>
<b>MCR Coverage</b>	<b>260%</b>	<b>265%</b>

## **E.2.2 Material changes to Solvency Capital Requirement and Minimum Capital Requirement over the reporting period**

During 2017 Solvency Capital Requirement value increased by 7,3 million Euros. Capital Requirement for Non-life underwriting risk grew by 6,4 million Euros mainly due to portfolio growth but also revised contract boundaries. Changes in all other individual risk categories stayed below 1,0 million Euros.

Minimum Capital Requirement increased by 3,3 million Euros due to Solvency Capital Requirement increase.

## **E.2.3 Simplified calculations**

ERGO uses simplified calculations with longevity risk as described in Article 92 of the Commission Delegate Regulation (EU) 2015/35.

Article 88 of the above-mentioned Delegated Regulation regulates the use of the simplified calculations. The Company assesses that the use of the simplification is justified considering the nature, scale and complexity of the specific risk.

## **E.2.4 Use of Undertaking-specific Parameters**

ERGO does not use Undertaking-specific Parameters (USP) as described in to Article 104 (7) of Directive 2009/138 / EC.

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

As the duration-based equity risk sub-module only applies to life insurance undertakings, ERGO does not use it.

## **E.4 Differences between the standard formula and any internal model used**

ERGO does not use internal model for calculating solvency capital requirement.

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

As at 31.12.2017 ERGO is compliant with the Minimum Capital Requirement and with the Solvency Capital Requirement.

## **E.6 Any other information**

There is no other information.

## APPENDICES

Appendices according to Commission Implementing Regulation (EU) 2015/2452.

### S.02.01.02

#### Balance sheet

Assets		Solvency II value C0010
Intangible assets	<b>R0030</b>	
Deferred tax assets	<b>R0040</b>	241 849,36
Pension benefit surplus	<b>R0050</b>	
Property, plant & equipment held for own use	<b>R0060</b>	8 288 721,44
Investments (other than assets held for index-linked and unit-linked contracts)	<b>R0070</b>	141 411 842,00
Property (other than for own use)	<b>R0080</b>	
Holdings in related undertakings, including participations	<b>R0090</b>	1 781 282,25
Equities	<b>R0100</b>	43 443,00
Equities - listed	<b>R0110</b>	
Equities - unlisted	<b>R0120</b>	43 443,00
Bonds	<b>R0130</b>	121 736 832,67
Government Bonds	<b>R0140</b>	54 497 758,18
Corporate Bonds	<b>R0150</b>	62 457 036,99
Structured notes	<b>R0160</b>	4 782 037,50
Collateralised securities	<b>R0170</b>	
Collective Investments Undertakings	<b>R0180</b>	17 850 284,08
Derivatives	<b>R0190</b>	
Deposits other than cash equivalents	<b>R0200</b>	
Other investments	<b>R0210</b>	
Assets held for index-linked and unit-linked contracts	<b>R0220</b>	
Loans and mortgages	<b>R0230</b>	1 497 456,61
Loans on policies	<b>R0240</b>	
Loans and mortgages to individuals	<b>R0250</b>	
Other loans and mortgages	<b>R0260</b>	1 497 456,61
Reinsurance recoverables from:	<b>R0270</b>	6 911 261,66
Non-life and health similar to non-life	<b>R0280</b>	5 383 788,82
Non-life excluding health	<b>R0290</b>	5 357 214,61
Health similar to non-life	<b>R0300</b>	26 574,21
Life and health similar to life, excluding health and index-linked and unit-linked	<b>R0310</b>	1 527 472,84
Health similar to life	<b>R0320</b>	
Life excluding health and index-linked and unit-linked	<b>R0330</b>	1 527 472,84
Life index-linked and unit-linked	<b>R0340</b>	
Deposits to cedants	<b>R0350</b>	
Insurance and intermediaries receivables	<b>R0360</b>	18 100 600,73
Reinsurance receivables	<b>R0370</b>	735 969,45
Receivables (trade, not insurance)	<b>R0380</b>	1 151 344,31
Own shares (held directly)	<b>R0390</b>	
Amounts due in respect of own fund items or initial fund called up but not yet paid in	<b>R0400</b>	
Cash and cash equivalents	<b>R0410</b>	11 900 067,74
Any other assets, not elsewhere shown	<b>R0420</b>	1 494 646,70
<b>Total assets</b>	<b>R0500</b>	<b>191 733 760,00</b>

<b>Liabilities</b>		<b>Solvency II value C0010</b>
Technical provisions – non-life	<b>R0510</b>	107 178 962,79
Technical provisions – non-life (excluding health)	<b>R0520</b>	103 052 763,07
Technical provisions calculated as a whole	<b>R0530</b>	
Best Estimate	<b>R0540</b>	99 445 788,43
Risk margin	<b>R0550</b>	3 606 974,64
Technical provisions - health (similar to non-life)	<b>R0560</b>	4 126 199,72
Technical provisions calculated as a whole	<b>R0570</b>	
Best Estimate	<b>R0580</b>	3 867 642,31
Risk margin	<b>R0590</b>	258 557,41
Technical provisions - life (excluding index-linked and unit-linked)	<b>R0600</b>	10 854 998,95
Technical provisions - health (similar to life)	<b>R0610</b>	
Technical provisions calculated as a whole	<b>R0620</b>	
Best Estimate	<b>R0630</b>	
Risk margin	<b>R0640</b>	
Technical provisions – life (excluding health and index-linked and unit-linked)	<b>R0650</b>	10 854 998,95
Technical provisions calculated as a whole	<b>R0660</b>	
Best Estimate	<b>R0670</b>	10 762 258,79
Risk margin	<b>R0680</b>	92 740,16
Technical provisions – index-linked and unit-linked	<b>R0690</b>	
Technical provisions calculated as a whole	<b>R0700</b>	
Best Estimate	<b>R0710</b>	
Risk margin	<b>R0720</b>	
Contingent liabilities	<b>R0740</b>	
Provisions other than technical provisions	<b>R0750</b>	
Pension benefit obligations	<b>R0760</b>	
Deposits from reinsurers	<b>R0770</b>	
Deferred tax liabilities	<b>R0780</b>	
Derivatives	<b>R0790</b>	
Debts owed to credit institutions	<b>R0800</b>	
Financial liabilities other than debts owed to credit institutions	<b>R0810</b>	
Insurance & intermediaries payables	<b>R0820</b>	8 788 286,81
Reinsurance payables	<b>R0830</b>	2 419 587,05
Payables (trade, not insurance)	<b>R0840</b>	7 104 210,90
Subordinated liabilities	<b>R0850</b>	6 210 063,33
Subordinated liabilities not in Basic Own Funds	<b>R0860</b>	210 063,33
Subordinated liabilities in Basic Own Funds	<b>R0870</b>	6 000 000,00
Any other liabilities, not elsewhere shown	<b>R0880</b>	
<b>Total liabilities</b>	<b>R0900</b>	<b>142 556 109,83</b>
<b>Excess of assets over liabilities</b>	<b>R1000</b>	<b>49 177 650,17</b>

S.05.01.02

Premiums, claims and expenses by line of business

		Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)								
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090
<b>Premiums written</b>										
Gross - Direct Business	<b>R0110</b>	3 934 964,95	6 469 902,24		68 846 484,93	45 035 214,17	2 000 261,63	28 550 728,73	6 081 684,71	2 166 731,87
Gross - Proportional reinsurance accepted	<b>R0120</b>									
Gross - Non-proportional reinsurance accepted	<b>R0130</b>									
Reinsurers' share	<b>R0140</b>	104 289,18	29 235,44		1 108 853,79	291 518,83	205 975,62	3 874 598,63	1 292 321,24	987 473,75
Net	<b>R0200</b>	3 830 675,77	6 440 666,80		67 737 631,14	44 743 695,34	1 794 286,01	24 676 130,10	4 789 363,47	1 179 258,12
<b>Premiums earned</b>										
Gross - Direct Business	<b>R0210</b>	3 829 477,60	6 224 314,72		60 718 006,12	42 682 750,16	1 897 002,71	27 500 671,84	5 780 064,30	1 941 894,51
Gross - Proportional reinsurance accepted	<b>R0220</b>									
Gross - Non-proportional reinsurance accepted	<b>R0230</b>									
Reinsurers' share	<b>R0240</b>	122 736,40	30 375,79		1 108 853,79	291 518,83	205 972,61	3 820 812,01	1 142 461,64	943 307,45
Net	<b>R0300</b>	3 706 741,20	6 193 938,93		59 609 152,33	42 391 231,33	1 691 030,10	23 679 859,83	4 637 602,66	998 587,06
<b>Claims incurred</b>										
Gross - Direct Business	<b>R0310</b>	1 610 923,83	2 404 023,49		34 767 902,21	25 595 225,08	270 161,07	8 535 343,60	1 255 009,34	256 029,42
Gross - Proportional reinsurance accepted	<b>R0320</b>									
Gross - Non-proportional reinsurance accepted	<b>R0330</b>									
Reinsurers' share	<b>R0340</b>	138 454,60	0,00		-1 060 241,37	-7 855,21	0,01	-3 153 020,81	15 630,72	31 874,43
Net	<b>R0400</b>	1 472 469,23	2 404 023,49		35 828 143,58	25 603 080,29	270 161,06	11 688 364,41	1 239 378,62	224 154,99



		Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)			Line of business for: accepted non-proportional reinsurance				Total
		Legal expenses insurance	Assistance	Miscellaneous financial loss	Health	Casualty	Marine, aviation, transport	Property	
		C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0200
<b>Premiums written</b>									
Gross - Direct Business	R0110	2 101 406,60	1 664 123,53	33 116,27					166 884 619,63
Gross - Proportional reinsurance accepted	R0120								
Gross - Non-proportional reinsurance accepted	R0130								
Reinsurers' share	R0140	645 538,41						-15 931,44	8 523 873,45
Net	R0200	1 455 868,19	1 664 123,53	33 116,27				15 931,44	158 360 746,18
<b>Premiums earned</b>									
Gross - Direct Business	R0210	2 106 306,60	1 613 029,77	32 558,84					154 326 077,17
Gross - Proportional reinsurance accepted	R0220								
Gross - Non-proportional reinsurance accepted	R0230								
Reinsurers' share	R0240	733 280,41	0,00	0,00				-15 931,44	8 383 387,49
Net	R0300	1 373 026,19	1 613 029,77	32 558,84				15 931,44	145 942 689,68
<b>Claims incurred</b>									
Gross - Direct Business	R0310	178 333,08	476 122,42	12 469,96					75 361 543,50
Gross - Proportional reinsurance accepted	R0320								
Gross - Non-proportional reinsurance accepted	R0330					4 150,27			4 150,27
Reinsurers' share	R0340	20 251,50				2 949,26			-4 011 956,87
Net	R0400	158 081,58	476 122,42	12 469,96		1 201,01			79 377 650,64





**S.05.02.01**

**Premiums, claims and expenses by country**

		Home country	Country (by amount of gross premiums written) - non-life obligations		Total Top 5 and home country
		C0010	C0020	C0030	C0070
Country	R0010		LITHUANIA	LATVIA	
<b>Premiums written</b>		C0080	C0090	C0100	C0140
Gross - Direct Business	R0110	57 422 605,85	79 444 286,14	30 017 727,64	166 884 619,63
Gross - Proportional reinsurance accepted	R0120				
Gross - Non-proportional reinsurance accepted	R0130				
Reinsurers' share	R0140	2 585 887,16	3 679 135,99	2 258 850,30	8 523 873,45
Net	R0200	54 836 718,69	75 765 150,15	27 758 877,34	158 360 746,18
<b>Premiums earned</b>					
Gross - Direct Business	R0210	54 738 151,49	71 616 403,80	27 971 521,88	154 326 077,17
Gross - Proportional reinsurance accepted	R0220				
Gross - Non-proportional reinsurance accepted	R0230				
Reinsurers' share	R0240	2 616 630,17	3 678 699,04	2 088 058,28	8 383 387,49
Net	R0300	52 121 521,32	67 937 704,76	25 883 463,60	145 942 689,68
<b>Claims incurred</b>					
Gross - Direct Business	R0310	26 452 206,06	37 608 271,29	11 301 066,15	75 361 543,50
Gross - Proportional reinsurance accepted	R0320				
Gross - Non-proportional reinsurance accepted	R0330		4 151,98	-1,71	4 150,27
Reinsurers' share	R0340	30 846,57	210 847,58	-4 253 651,02	-4 011 956,87
Net	R0400	26 421 359,49	37 401 575,69	15 554 715,46	79 377 650,64

		Home country	Country (by amount of gross premiums written) - non-life obligations		Total Top 5 and home country
		C0010	C0020	C0030	C0070
	<b>R0010</b>		LITHUANIA	LATVIA	
<b>Changes in other technical provisions</b>					
Gross - Direct Business	<b>R0410</b>		34 173,85		34 173,85
Gross - Proportional reinsurance accepted	<b>R0420</b>				
Gross - Non-proportional reinsurance accepted	<b>R0430</b>				
Reinsurers' share	<b>R0440</b>				
Net	<b>R0500</b>		34 173,85		34 173,85
<b>Expenses incurred</b>	<b>R0550</b>	19 105 553,36	26 518 083,66	10 300 088,23	<b>55 923 725,25</b>
<b>Other expenses</b>	<b>R1200</b>				<b>3 073 264,50</b>
<b>Total expenses</b>	<b>R1300</b>				<b>58 996 989,75</b>

		Home country	Country (by amount of gross premiums written) - non-life obligations		Total Top 5 and home country
		C0150	C0160	C0170	C0210
Country	R0010		LITHUANIA	LATVIA	
<b>Premiums written</b>		<b>C0220</b>	<b>C0230</b>	<b>C0240</b>	<b>C0280</b>
Gross	R1410				
Reinsurers' share	R1420				
Net	R1500				
<b>Premiums earned</b>					
Gross	R1510				
Reinsurers' share	R1520				
Net	R1600				
<b>Claims incurred</b>					
Gross	R1610	1 278 909,69	1 704 639,64	337 384,00	3 320 933,33
Reinsurers' share	R1620	-116 331,00	-783,00		-117 114,00
Net	R1700	1 395 240,69	1 705 422,64	337 384,00	3 438 047,33
<b>Changes in other technical provisions</b>					
Gross	R1710				
Reinsurers' share	R1720				
Net	R1800				
<b>Expenses incurred</b>	R1900				
<b>Other expenses</b>	R2500				
<b>Total expenses</b>	R2600				

**S.12.01.02**

**Life and Health SLT Technical Provisions**

		Insurance with profit participation	Index-linked and unit-linked insurance		Other life insurance			Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Accepted reinsurance	Total (Life other than health insurance, incl. Unit-Linked)	
				Contracts without options and guarantees	Contracts with options or guarantees		Total (Life other than health insurance, incl. Unit-Linked)				Contracts with options or guarantees
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0150
<b>Technical provisions calculated as a whole</b>	<b>R0010</b>										
<b>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</b>	<b>R0020</b>										
<b>Technical provisions calculated as a sum of BE and RM</b>											
<b>Best Estimate</b>											
<b>Gross Best Estimate</b>	<b>R0030</b>								10 762 258,79		10 762 258,79
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	<b>R0080</b>								1 527 472,84		1 527 472,84
Best estimate minus recoverables from reinsurance/SPV and Finite Re - total	<b>R0090</b>								9 234 785,95		9 234 785,95

		Insurance with profit participation	Index-linked and unit-linked insurance		Other life insurance			Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Accepted reinsurance	Total (Life other than health insurance, incl. Unit-Linked)	
				Contracts without options and guarantees	Contracts with options or guarantees		Total (Life other than health insurance, incl. Unit-Linked)				Contracts with options or guarantees
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0150
<b>Risk Margin</b>	<b>R0100</b>								92 740,16		92 740,16
<b>Amount of the transitional on Technical Provisions</b>											
Technical Provisions calculated as a whole	<b>R0110</b>										
Best estimate	<b>R0120</b>										
Risk margin	<b>R0130</b>										
<b>Technical provisions - total</b>	<b>R0200</b>								10 854 998,95		10 854 998,95

		Health insurance (direct business)			Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Health reinsurance (reinsurance accepted)	Total (Health similar to life insurance)
			Contracts without options and guarantees	Contracts with options or guarantees			
		C0160	C0170	C0180	C0190	C0200	C0210
Technical provisions calculated as a whole	R0010						
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole	R0020						
Technical provisions calculated as a sum of BE and RM							
Best Estimate							
Gross Best Estimate	R0030						
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0080						
Best estimate minus recoverables from reinsurance/SPV and Finite Re - total	R0090						
Risk Margin	R0100						
Amount of the transitional on Technical Provisions							
Technical Provisions calculated as a whole	R0110						
Best estimate	R0120						
Risk margin	R0130						
Technical provisions - total	R0200						

**S.17.01.02 Non-Life Technical Provisions**

		Direct business and accepted proportional reinsurance								
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100
<b>Technical provisions calculated as a whole</b>	<b>R0010</b>									
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	<b>R0050</b>									
<b>Technical provisions calculated as a sum of BE and RM</b>										
<b>Best estimate</b>										
<i>Premium provisions</i>										
Gross	<b>R0060</b>	681 516,51	1 517 565,70		22 784 149,51	15 070 103,89	269 030,60	5 425 753,51	897 577,87	147 695,78
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	<b>R0140</b>	-8 564,03	-28 338,17		1 232 821,95	-199 964,50	-19 308,53	-1 298 929,35	-217 335,02	-24 948,27
Net Best Estimate of Premium Provisions	<b>R0150</b>	690 080,54	1 545 903,87		21 551 327,56	15 270 068,39	288 339,13	6 724 682,86	1 114 912,89	172 644,05
<i>Claims provisions</i>										
Gross	<b>R0160</b>	662 635,84	1 005 924,26		34 643 333,44	5 653 042,46	370 386,96	6 899 774,61	5 770 721,30	509 775,44
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	<b>R0240</b>	63 476,41			3 235 797,52	42,09	13 401,22	858 153,36	1 510 450,86	267 033,28
Net Best Estimate of Claims Provisions	<b>R0250</b>	599 159,43	1 005 924,26		31 407 535,92	5 653 000,37	356 985,74	6 041 621,25	4 260 270,44	242 742,16

		Direct business and accepted proportional reinsurance								
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100
<b>Total Best estimate - gross</b>	<b>R0260</b>	1 344 152,35	2 523 489,96		57 427 482,95	20 723 146,35	639 417,56	12 325 528,12	6 668 299,17	657 471,22
<b>Total Best estimate - net</b>	<b>R0270</b>	1 289 239,97	2 551 828,13		52 958 863,48	20 923 068,76	645 324,87	12 766 304,11	5 375 183,33	415 386,21
<b>Risk margin</b>	<b>R0280</b>	85 591,19	172 966,22		1 637 074,67	962 009,90	36 876,26	706 316,46	168 470,30	28 915,14
<b>Amount of the transitional on Technical Provisions</b>										
Technical Provisions calculated as a whole	<b>R0290</b>									
Best estimate	<b>R0300</b>									
Risk margin	<b>R0310</b>									
<b>Technical provisions - total</b>										
Technical provisions - total	<b>R0320</b>	1 429 743,54	2 696 456,18		59 064 557,62	21 685 156,25	676 293,82	13 031 844,58	6 836 769,47	686 386,36
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	<b>R0330</b>	54 912,38	-28 338,17		4 468 619,47	-199 922,41	-5 907,31	-440 775,99	1 293 115,84	242 085,01
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	<b>R0340</b>	1 374 831,16	2 724 794,35		54 595 938,15	21 885 078,66	682 201,13	13 472 620,57	5 543 653,63	444 301,35

		Direct business and accepted proportional reinsurance			Accepted non-proportional reinsurance				Total Non-Life obligation
		Legal expenses insurance	Assistance	Miscellaneous financial loss	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance	
		C0110	C0120	C0130	C0140	C0150	C0160	C0170	
<b>Technical provisions calculated as a whole</b>	<b>R0010</b>								
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	<b>R0050</b>								
<b>Technical provisions calculated as a sum of BE and RM</b>									
<b>Best estimate</b>									
<i>Premium provisions</i>									
Gross	<b>R0060</b>	5 444,87	423 349,56						<b>47 222 187,80</b>
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	<b>R0140</b>								<b>-564 565,92</b>
Net Best Estimate of Premium Provisions	<b>R0150</b>	5 444,87	423 349,56						<b>47 786 753,72</b>
<i>Claims provisions</i>									
Gross	<b>R0160</b>	466 557,91	109 090,72						<b>56 091 242,94</b>
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	<b>R0240</b>								<b>5 948 354,74</b>
Net Best Estimate of Claims Provisions	<b>R0250</b>	466 557,91	109 090,72						<b>50 142 888,20</b>

		Direct business and accepted proportional reinsurance			Accepted non-proportional reinsurance				Total Non-Life obligation
		Legal expenses insurance	Assistance	Miscellaneous financial loss	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance	
		C0110	C0120	C0130	C0140	C0150	C0160	C0170	
<b>Total Best estimate - gross</b>	<b>R0260</b>	472 002,78	532 440,28						<b>103 313 430,74</b>
<b>Total Best estimate - net</b>	<b>R0270</b>	472 002,78	532 440,28						<b>97 929 641,92</b>
<b>Risk margin</b>	<b>R0280</b>	34 035,54	33 276,37						<b>3 865 532,05</b>
<b>Amount of the transitional on Technical Provisions</b>									
Technical Provisions calculated as a whole	<b>R0290</b>								
Best estimate	<b>R0300</b>								
Risk margin	<b>R0310</b>								
<b>Technical provisions - total</b>									
Technical provisions - total	<b>R0320</b>	506 038,32	565 716,65						<b>107 178 962,79</b>
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	<b>R0330</b>								<b>5 383 788,82</b>
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	<b>R0340</b>	506 038,32	565 716,65						<b>101 795 173,97</b>

**S.19.01.21**

**Non-life Insurance Claims**

**Total Non-Life Business**

**Accident year / Underwriting year**

2020	Accident year
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**Gross Claims Paid (non-cumulative)**

**(absolute amount)**

		Development year											In Current year	Sum of years (cumulative)
		0	1	2	3	4	5	6	7	8	9	10 & +		
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0170	C0180
Prior	<b>R0100</b>											64 762,44	64 762,44	64 762,44
N-9	<b>R0160</b>	62 324 277,93	15 246 035,34	1 330 880,80	435 695,01	262 645,81	638 836,25	26 008,85	161 578,26	147 146,37	64 644,75		64 644,75	80 637 749,37
N-8	<b>R0170</b>	47 508 532,64	10 022 703,19	1 355 185,22	1 949 212,60	519 504,61	148 082,91	180 814,11	1 658,60	-697,72			-697,72	61 684 996,16
N-7	<b>R0180</b>	43 187 714,57	11 971 222,33	1 702 076,45	886 094,17	383 105,50	15 426,71	6 522,77	-8 416,69				-8 416,69	58 143 745,81
N-6	<b>R0190</b>	42 708 191,89	12 406 045,63	1 543 401,16	377 595,97	231 963,95	186 820,15	-20 105,46					-20 105,46	57 433 913,29
N-5	<b>R0200</b>	42 343 372,09	12 704 570,45	1 083 818,43	576 314,72	208 295,88	27 659,74						27 659,74	56 944 031,31
N-4	<b>R0210</b>	43 226 798,98	11 023 949,26	1 133 052,96	862 093,52	687 892,62							687 892,62	56 933 787,34
N-3	<b>R0220</b>	40 689 074,19	19 158 765,42	1 498 928,13	705 723,83								705 723,83	62 052 491,57
N-2	<b>R0230</b>	48 538 884,53	21 521 020,16	1 738 803,83									1 738 803,83	71 798 708,52
N-1	<b>R0240</b>	59 849 041,27	18 220 806,45										18 220 806,45	78 069 847,72
N	<b>R0250</b>	57 664 207,16											57 664 207,16	57 664 207,16
Total	<b>R0260</b>												79 145 280,95	641 428 240,69



## S.23.01.01

### Own funds

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
<b>Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35</b>						
Ordinary share capital (gross of own shares)	<b>R0010</b>	6 391 391,10	6 391 391,10			
Share premium account related to ordinary share capital	<b>R0030</b>					
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	<b>R0040</b>					
Subordinated mutual member accounts	<b>R0050</b>					
Surplus funds	<b>R0070</b>					
Preference shares	<b>R0090</b>					
Share premium account related to preference shares	<b>R0110</b>					
Reconciliation reserve	<b>R0130</b>	42 544 409,71	42 544 409,71			
Subordinated liabilities	<b>R0140</b>	6 000 000,00			6 000 000,00	
An amount equal to the value of net deferred tax assets	<b>R0160</b>	241 849,36				241 849,36
Other own fund items approved by the supervisory authority as basic own funds not specified above	<b>R0180</b>					
<b>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</b>						
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	<b>R0220</b>					
<b>Deductions</b>						
Deductions for participations in financial and credit institutions	<b>R0230</b>					
<b>Total basic own funds after deductions</b>	<b>R0290</b>	55 177 650,17	48 935 800,81		6 000 000,00	241 849,36
<b>Ancillary own funds</b>						
Unpaid and uncalled ordinary share capital callable on demand	<b>R0300</b>					

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	<b>R0310</b>					
Unpaid and uncalled preference shares callable on demand	<b>R0320</b>					
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	<b>R0330</b>					
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	<b>R0340</b>					
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	<b>R0350</b>					
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	<b>R0360</b>					
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	<b>R0370</b>					
Other ancillary own funds	<b>R0390</b>					
<b>Total ancillary own funds</b>	<b>R0400</b>					
<b>Available and eligible own funds</b>						
Total available own funds to meet the SCR	<b>R0500</b>	55 177 650,17	48 935 800,81		6 000 000,00	241 849,36
Total available own funds to meet the MCR	<b>R0510</b>	54 935 800,81	48 935 800,81		6 000 000,00	
Total eligible own funds to meet the SCR	<b>R0540</b>	55 177 650,17	48 935 800,81		6 000 000,00	241 849,36
Total eligible own funds to meet the MCR	<b>R0550</b>	53 021 143,40	48 935 800,81		4 085 342,59	
<b>SCR</b>	<b>R0580</b>	45 392 695,43				
<b>MCR</b>	<b>R0600</b>	20 426 712,94				
<b>Ratio of Eligible own funds to SCR</b>	<b>R0620</b>	1,2156				
<b>Ratio of Eligible own funds to MCR</b>	<b>R0640</b>	2,5957				

		C0060
<b>Reconciliation reserve</b>		
Excess of assets over liabilities	<b>R0700</b>	49 177 650,17
Own shares (held directly and indirectly)	<b>R0710</b>	
Foreseeable dividends, distributions and charges	<b>R0720</b>	
Other basic own fund items	<b>R0730</b>	6 633 240,46
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	<b>R0740</b>	
<b>Reconciliation reserve</b>	<b>R0760</b>	42 544 409,71
<b>Expected profits</b>		
Expected profits included in future premiums (EPIFP) - Life business	<b>R0770</b>	
Expected profits included in future premiums (EPIFP) - Non-life business	<b>R0780</b>	2 860 136,21
<b>Total Expected profits included in future premiums (EPIFP)</b>	<b>R0790</b>	2 860 136,21

### S.25.01.01

## Solvency Capital Requirement - for undertakings on Standard Formula

### Basic Solvency Capital Requirement

		Gross solvency capital requirement	USP	Simplifications
		<b>C0110</b>	<b>C0090</b>	<b>C0100</b>
Market risk	<b>R0010</b>	5 016 051,04		
Counterparty default risk	<b>R0020</b>	4 824 533,28		
Life underwriting risk	<b>R0030</b>	291 076,10		
Health underwriting risk	<b>R0040</b>	2 695 055,44		
Non-life underwriting risk	<b>R0050</b>	36 234 683,32		
Diversification	<b>R0060</b>	-8 298 486,07		
Intangible asset risk	<b>R0070</b>			
<b>Basic Solvency Capital Requirement</b>	<b>R0100</b>	40 762 913,11		

## Calculation of Solvency Capital Requirement

		<b>C0100</b>
Operational risk	<b>R0130</b>	4 629 782,32
Loss-absorbing capacity of technical provisions	<b>R0140</b>	
Loss-absorbing capacity of deferred taxes	<b>R0150</b>	
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	<b>R0160</b>	
<b>Solvency capital requirement excluding capital add-on</b>	<b>R0200</b>	45 392 695,43
Capital add-on already set	<b>R0210</b>	
Solvency capital requirement	<b>R0220</b>	45 392 695,43
<b>Other information on SCR</b>		
Capital requirement for duration-based equity risk sub-module	<b>R0400</b>	
Total amount of Notional Solvency Capital Requirements for remaining part	<b>R0410</b>	
Total amount of Notional Solvency Capital Requirements for ring fenced funds	<b>R0420</b>	
Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios	<b>R0430</b>	
Diversification effects due to RFF nSCR aggregation for article 304	<b>R0440</b>	

**S.28.01.01**

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

**Linear formula component for non-life insurance and reinsurance obligations**

		<b>C0010</b>
MCR <sub>NL</sub> Result	<b>R0010</b>	22 067 618,81

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
		<b>C0020</b>	<b>C0030</b>
Medical expense insurance and proportional reinsurance	<b>R0020</b>	1 289 239,97	3 830 675,77
Income protection insurance and proportional reinsurance	<b>R0030</b>	2 551 828,13	6 440 666,80
Workers' compensation insurance and proportional reinsurance	<b>R0040</b>		
Motor vehicle liability insurance and proportional reinsurance	<b>R0050</b>	52 958 863,48	67 753 562,58
Other motor insurance and proportional reinsurance	<b>R0060</b>	20 923 068,76	44 743 695,34
Marine, aviation and transport insurance and proportional reinsurance	<b>R0070</b>	645 324,87	1 794 286,01
Fire and other damage to property insurance and proportional reinsurance	<b>R0080</b>	12 766 304,11	24 676 130,10
General liability insurance and proportional reinsurance	<b>R0090</b>	5 375 183,33	4 789 363,47
Credit and suretyship insurance and proportional reinsurance	<b>R0100</b>	415 386,21	1 212 374,39
Legal expenses insurance and proportional reinsurance	<b>R0110</b>	472 002,78	1 455 868,19
Assistance and proportional reinsurance	<b>R0120</b>	532 440,28	1 664 123,53
Miscellaneous financial loss insurance and proportional reinsurance	<b>R0130</b>		
Non-proportional health reinsurance	<b>R0140</b>		
Non-proportional casualty reinsurance	<b>R0150</b>		
Non-proportional marine, aviation and transport reinsurance	<b>R0160</b>		
Non-proportional property reinsurance	<b>R0170</b>		

### Linear formula component for life insurance and reinsurance obligations

		<b>C0040</b>
MCR <sub>L</sub> Result	<b>R0200</b>	193 930,50

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
		<b>C0050</b>	<b>C0060</b>
Obligations with profit participation - guaranteed benefits	<b>R0210</b>		
Obligations with profit participation - future discretionary benefits	<b>R0220</b>		
Index-linked and unit-linked insurance obligations	<b>R0230</b>		
Other life (re)insurance and health (re)insurance obligations	<b>R0240</b>	9 234 785,95	
Total capital at risk for all life (re)insurance obligations	<b>R0250</b>		

### Overall MCR calculation

		<b>C0070</b>
Linear MCR	<b>R0300</b>	22 261 549,31
SCR	<b>R0310</b>	45 392 695,43
MCR cap	<b>R0320</b>	20 426 712,94
MCR floor	<b>R0330</b>	11 348 173,86
Combined MCR	<b>R0340</b>	20 426 712,94
Absolute floor of the MCR	<b>R0350</b>	3 700 000,00
<b>Minimum Capital Requirement</b>	<b>R0400</b>	20 426 712,94