



Solvency and Financial Condition Report (SFCR)
For Financial Year Ending 31st December 2024

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Executive Summary

The "Report on solvency and financial condition" ("SFCR") has been prepared in accordance with the requirements in Chapter 3, Public Disclosure of the European Union (Insurance and Reinsurance) Regulation 2015 (S.I. No. 485 of 2015).

Unless otherwise specified, the data are expressed in thousands of Euros.

Business and Performance

BBPM Life dac ("BBPM Life" or the "Company") is an insurance undertaking, incorporated in Ireland and authorised to carry on Class III life assurance business.

The Company is owned 100% by Vera Vita S.p.A. Vera Vita S.p.A. from December 2023 is 100% owned by the Banco BPM Vita S.p.A., which is 100% owned by Banco BPM S.p.A.

The policyholders' assets under management as at the end of the year amounted to €3,429m compared to €2,346m at the end of the previous year. This was generated through sales of insurance products in the Italian market. The assets under management have increased by 46% as compared to 2023. The profit, at year end, recognised in equity is €10.16m.

System of Governance

The Board of Directors ("the Board") has the overall responsibility for business decisions and for compliance with the regulatory system. The Board is responsible for the effective, prudent and ethical oversight of the Company, setting its business strategy and ensuring that risk and compliance are properly managed.

The risk management system is the set of processes and tools used to support the risk management strategy of the Company and allows an adequate understanding of the nature and significance of the risks to which the Company is exposed to. The risk management process is defined, into the following phases:

- identification of risks;
- current and prospective evaluation of exposure to risks;
- monitoring and reporting of exposure to risks;
- mitigation of risks.

BBPM Life seeks to manage its capital and risk exposures so that it is able to meet all financial commitments to policyholders in full after extreme shocks. The Company also manages its liquidity in line with its risk appetite and monitors this on an ongoing basis.

The Own Risk and Solvency Assessment ('ORSA') provides the Board with a comprehensive overview of the risks the Company is exposed to or could face in the future and how they translate into capital needs or alternatively require mitigation.

Risk Profile

The Company's strategy is to sell insurance policies which do not present significant insurance risk for the Company. BBPM Life does not write any products with any investment guarantees. Due to the nature of the business written, the majority of risks will impact on the value of management charges arising on the business or the loss of business. A low-risk approach is also taken in relation to the management of the shareholder investments, with investment in assets with low market risk.

Valuation for Solvency Purposes

The following table summarises the valuation of assets and liabilities as at 31 December 2024 and the own funds of the Company.

Asset Category	€ 000	Liability Category	€ 000
Property, plant and equipment own use	2,340	Best estimate	3,384,618
Financial Assets at fair value	3,502,164	Risk margin	10,348
Cash and equivalent to cash	22,639	Deferred tax liabilities	7,006
Insurance and intermediaries' receivables	50,778	Financial liabilities other than debts owed to credit institutions	2,407
Receivables	672	Insurance, Trade and Reinsurance payables	36,835
All other assets not mentioned elsewhere	1,437	All other liabilities not reported elsewhere	1,777
Total assets	3,580,030	Total liabilities	3,442,991
		Surplus of assets over liabilities	137,039

The valuation of assets is the same as the valuation for IFRS purposes, except for the removal of the Deferred Acquisition Cost ("DAC"), Deferred Income Liability ("DIL") and the Deferred Tax impact.

Capital Management

The following table summarises the Company's capital position as at 31 December 2024 and 31 December 2023:

(€'000)	2024	2023	Difference
Own Funds	137,039	103,263	33%
SCR	46,715	30,193	55%
Solvency Coverage Ratio	293%	342%	(14%)

The increase in own funds over the year was primarily driven by:

- An increase in the Value-in-force (VIF) of the Company; and
- Profit earned throughout the year

This was partly offset by:



- an increase in the Solvency II Risk Margin.

The Solvency Capital Requirement ("SCR") has increased over the year as outlined in Section E.2 of this Report (driven primarily by an increase in the Market and Life Underwriting Risk capital charges).

The Company monitors its capital position on an ongoing basis. The ORSA is a key tool for ensuring that the Company has sufficient understanding of the potential development of its own funds position over time. The ORSA examines the potential development of the capital position over a three-year period.



A. Business and Performance

A.1 Business

Company information

BBPM Life is authorised by the Central Bank of Ireland to transact cross-border life assurance business in the European Union under the Third Life Directive, as introduced into domestic Irish legislation by the European Communities (Life Assurance) Framework Regulations, 1994 as amended by the European Union (Insurance and Reinsurance) Regulations 2015.

The Company is subject to supervision by the Central Bank of Ireland, responsible for the prudential supervision of the undertaking.

The External Auditor of the Company is Grant Thornton Ireland, with a registered office in 13 - 18 City Quay, Dublin 2, D02 ED70, Ireland.

Holders of the Company's Equity

As at the 31 December 2024, the immediate parent undertaking and controlling party of the Company is Vera Vita S.p.A., incorporated in Italy.

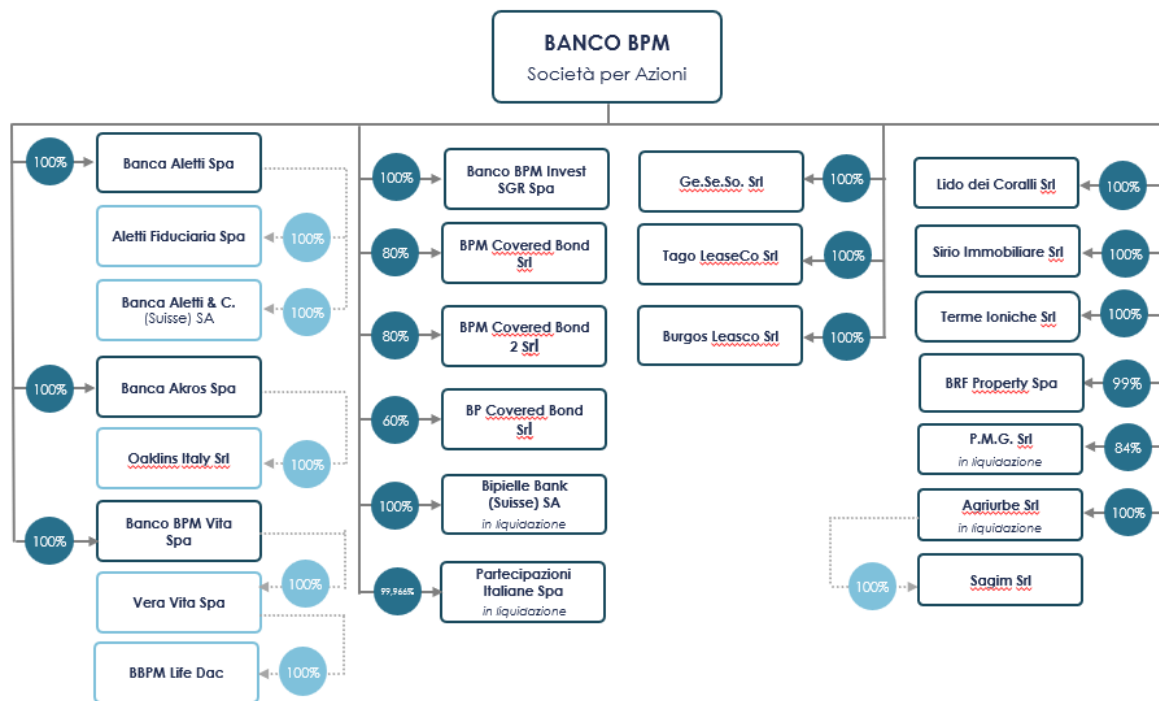
Vera Vita S.p.A. is 100% owned by the Banco BPM Vita S.p.A., incorporated in Italy, which is 100% owned by Banco BPM S.p.A., incorporated in Italy, consolidates these financial statements in its group report.

The Insurance consolidated financial statements are available from the Company Secretary, at Banco BPM Vita, via Massaua, 6, 20146 Milano, Italy.

The Financial Conglomerate consolidated financial statement are available from the Company Secretary, at Banco BPM S.p.A, Piazza Filippo Meda no. 4, 20121 Milano, Italy.

The table below shows the corporate structure of the Banco BPM S.p.A. with evidence of the position occupied by the Company within the group itself as at the 31 December 2024:

Gruppo BANCO BPM



Areas of Activities

BBPM Life is authorised to sell Life Insurance products and operates in the Line of Business or "LoB" *unit-linked insurance* as defined in Annex I of the Commission Delegated Regulation (EU) 2015/35:

The Company is authorised to sell life insurance products in some European countries and operates mainly in the Italian territory on a Freedom of Services regime. Please refer to the paragraph concerning the underwriting results for the distribution of the same in terms of the area of activity and geographical areas.

Significant events during the year 2024

New business

We released a new Multi-Option (MOP 2) product in 2024 and it continued to perform well and resulted in a strong year of sales with actual sales volumes of €1,148m (2023: €635m), an increase of 81% on 2023, exceeding the expectation of sales of €920m for 2024.

DORA

The company successfully met its current obligations under the requirements of the Digital Operational Resilience Act (DORA), Regulation (EU) 2022/2554. This regulation aims to enhance the digital operational resilience of financial entities, ensuring robust ICT risk management and resilience against severe operational disruptions. The successful



implementation of DORA underscores our commitment to maintaining high standards of digital security and operational resilience, aligning with regulatory expectations and safeguarding the interests of our stakeholders.

Migration to a new front-end

BBPM Life successfully completed its migration to a new front-end in December 2024, following the December 2023 acquisition of Vera Vita S.p.A. by Banco BPM Vita S.p.A.

Policyholder assets

The policyholders' assets as at the end of the year amounted to €3,429m (2023: €2,346m). This was generated through sales in the Italian market that had a positive net impact of €1,083m; mainly due to the premiums being higher than the claims.

A.2 Underwriting results

This section covers the qualitative and quantitative results of the company. It is considered at an aggregate level as well as for the areas of substantive activities ("Line of business" or "LoB") and substantial geographical areas where the activity takes place during the reporting period.

Areas of activities

The table below shows the amount of gross premiums written, premiums earned, claims incurred, changes in life provisions and expenses, broken down by LoB, where the Company operates.

In order to better clarify the methods of calculating the "Underwriting Result" with respect to the amounts at financial statements level, the following should be noted:

- The "Gross written premiums" contain the values recorded in the reporting period;
- The "Earned premiums" are equal to Gross written premiums;
- The "Claims" include all charges relating to claims;
- The "Changes in life assurance provision" includes all other reserves not included in previous items including the changes in other technical provisions for the gross direct business;
- The "Expenditures" include all expenses for the period directly linked to specific LoB such as commissions and any other acquisition charges, collection commissions, administrative expenses, operating expenses of investments, insurance expenses for qualified nature as costs and to settlement costs and the variation of the corresponding reserve for expenses as indicated by the relevant legislation.

Table A1 - Life underwriting results

Areas of activities – Business Life		2024 Insurance linked to indices and shares €'000	2023 Insurance linked to indices and shares €'000	change
Gross written premiums	(a)	1,147,985	635,239	81%
Earned Premiums	(b)	1,147,985	635,239	81%
Charges for claims	(c)	216,551	180,758	20%
Changes in Life Assurance provisions	(d)	1,083,283	560,627	93%
Expenditures	(e)	53,102	33,971	56%
Underwriting result	(g)=(b)- (c)-(d)-(e)	(204,951)	(140,117)	46%

The change in the underwriting result is mainly due to an increase in technical reserves due to the excess of premiums over claims over the period.

The life insurances include 87,261 policies. The Investment results below show the gains made by the LoB. When the gain in the investment results is added to the Life Underwriting result (see above) the net result of the underwriting is €11.1m (2023: €9.5m) with an adjustment for IFRS 17 of €12.6m (2023: €3.6m).

Geographical areas

With reference to the geographical location of the activities during the year 2024, the Company wrote premiums only in Italy on a Freedom of Service basis. The amount of assumed premiums, written gross premiums, claims paid and expenses, broken down by geographic area, as per the QRT Report S.05.02.01 annexed.

A.3 Investment results

This section shows the results of the Company's investments, broken down by asset class and type of income or expense in the period, as reported in the financial statements.

Details of income and assets and financial liabilities, profits and losses from trading and the investment recoveries and adjustments are reported in the following tables, with separate disclosure of income and expenses related to investments for the benefit of policyholders who bear risk (class III).

Table A2 - Investment income

(€'000)	2024	2023	change %
Financial income and ordinary capital			
Bonds	437	589	(26%)
Cash and equivalent to cash	172	88	95%
Total (a)	609	677	(10%)
Profits on gains			
Bonds	1,424	19	7395%
Total (b)	1,424	19	7395%
Total (a + b)	2,033	696	192%
Proceeds of policyholders' investments			
Investment funds and market indices	215,958	149,788	44%
Total Class III	215,958	149,788	44%
TOTAL	217,991	150,484	45%

Table A3 - Investment charges

(€'000)	2024	2023	change %
Losses			
Bonds	81	41	98%
TOTAL	81	41	98%

The Profit recognised in equity is €10.2m.

A.4 Results of other activities

Below are details of other significant income and expenses, which have not already been included in previous sections A.2 and A.3, that the company has supported in the period.

Table A4 – Other Income

(€'000)	2024	2023	change %
Deferred Income Liabilities	(13,594)	(6,504)	109%
Other income	0	228	(100%)
Total other income	13,594	6,276	117%

Table A5 – Other Expenses

(€'000)	2024	2023	change %
Current taxes	1,509	1,015	49%
Pillar Two top-up tax	260	-	100%
Deferred Income Taxes	30	(6)	600%
Income tax charges Total	1,799	1,009	78%



A.5 Other information

There is no other relevant information regarding the business and performance of the Company.

B. Governance System

B.1 General information on the Governance System

B.1.1 Role and Responsibilities of the Board

Pursuant to the provisions of the Companies Acts 2014 and the Memorandum and Articles of Association of the Company, the Directors are mindful of their obligations to act honestly and in good faith in the best interests of the Company and to exercise care, diligence and skill in the discharge of their duties.

As the Board has overall plenary power, the following is not intended to limit the powers of the Board, but to assist the Board in the exercise of its powers and the fulfilment of its duties.

The role of the Board is to carry out its duties and obligations as set out in the constitution documents and company law.

In performing this role, the Board shall provide strategic guidance for the Company and effective oversight of management.

The Board shall always retain ultimate authority over management of the Company.

The responsibilities of the Board include (but are not limited to):

- Setting the direction, strategies and financial objectives of the Company, supported by professional business advisors such as lawyers, tax advisers and actuaries;
- Oversight of the Company, including its control and accountability systems;
- Monitoring compliance with statutory and regulatory requirements;
- Reviewing and ratifying systems of risk management and internal control;
- Approval of Financial Statements and Report of the Directors;
 - The Directors are responsible for preparing the Directors' Report and the financial statements in accordance with IFRS Accounting Standards as adopted by EU ("IFRS").
 - Irish law requires the Directors to prepare financial statements for each financial year. Under that law, the Directors have prepared the financial statements in accordance with IFRS Accounting Standards as adopted by EU ("IFRS").
 - Under Irish law, the Directors shall not approve the financial statements unless they are satisfied that they give a true and fair view of the Company's assets, liabilities and financial position as at the end of the financial year and the Company's profit or loss for the financial year.
 - The Directors are responsible for keeping adequate accounting records that are sufficient to correctly record and explain the transactions of the Company; enable, at any time, the assets, liabilities, financial position and profit or loss of the Company to be determined with reasonable accuracy; and enable the Directors to ensure that the financial statements comply with the Companies Act 2014 and enable those financial statements to be audited.
 - The Directors are also responsible for safeguarding the assets of the Company and hence for taking reasonable steps for the prevention and detection of fraud and other irregularities.

- Approval of Budget;
 - The Directors are responsible for approving the annual budget of the Company.
- Returns to the Central Bank of Ireland;
 - To the extent that an insurance undertaking is obliged under the Requirements to submit returns, statements and information to the Central Bank, such information and returns shall also be required under, Section 16 of the Insurance Act 1989 and Regulation 34 of the European Union (Insurance and Reinsurance) Regulations 2015 (S.I. 485 of 2015), as applicable.
 - In addition to the annual quantitative template, the Directors are obliged pursuant to Regulation 36 of the Regulations to annex a directors' accuracy certificate attesting to the accuracy of the information submitted in the templates and to annex to each ORSA and each regular supervisory report or annual summary of the regular supervisory report, a directors' certificate attesting the accuracy of the information submitted in the reports. This Directors' accuracy certificate should be completed in accordance with the Central Bank's "Guideline for Solvency II (Re)Insurance Undertakings on Directors' Certifications" which took effect on 1 January 2016.
- Appointment of Directors;
 - Pursuant to the Articles of Association of the Company, the Directors have the power at any time to appoint any person to be a director either to fill a casual vacancy or as an addition to the existing Directors.
- Approval of Appointments;
 - The Directors are responsible for ensuring that any proposed appointment to Director or to senior management meets the Central Bank's "fitness and probity" regime and that an approval letter is received in advance from the Central Bank.
- Monitoring senior management's performance and their implementation of strategies, policies and budgets;
- Ensuring appropriate resources are available for the Company in the pursuit of its objectives;
- Formal approval of principal Company Procedures;
 - The Directors are responsible for approving the principal Company Procedures such as procedures relating to the Company's pricing policy, investment policy and asset management policy;
- Approval of investment strategy;
 - The Directors are responsible for ensuring the Company has sufficient assets to cover technical provisions and a required solvency margin. In order to ensure that the Company can meet its contractual obligations to policyholders, such assets must be managed in a sound and prudent manner taking account of the profile of the liabilities held by the Company and the complete risk return profile. In this regard, the Directors are responsible for the formulation and approval of the strategic investment policy, taking account of the asset/liability

relationship, its long-term risk-return requirements, its liquidity requirements and its solvency position and any related reinsurance requirements.

- The Directors must always retain ultimate responsibility for the Company's investment policy and procedures, regardless of the extent to which associated activities and functions are delegated or outsourced.
- The Directors must ensure that adequate reporting and internal control systems are in place, designed to monitor that assets are being managed in accordance with the investment policy and mandate(s), and legal and regulatory requirements.
- Approval of investment strategy regarding new product developments and any significant changes thereto;
- Approval of key strategic decisions such as:
 - Renewal of principal third party contracts.
 - New proposed territories/markets.
 - Mergers and Acquisitions, sale and purchase of shareholdings, etc.

In performing its functions, the Board may delegate any of its powers to a Board Committee or to other persons in accordance with the Articles of Association of the Company and the Terms of Reference, however the Board remains responsible for the oversight of any such powers delegated by it.

The Board has established four committees namely the Audit Committee, the Risk Committee, the Investment Committee, the Nominations and Remuneration Committees. The constitution and terms of reference of the committees and their specific powers shall be approved by the Board of Directors and duly recorded. These constitutions and terms of reference are detailed in the Corporate Governance Manual of the Company under the heading Committees.

B.1.2 Transactions with related parties

Since 2009, the Company has entered into transactions with its distributor, Banco BPM S.p.A.

The Insurance consolidated financial statements are drawn up by Banco BPM Vita., with headquarters in via Massaua, 6, 20146 Milano. The Financial Conglomerate consolidated financial statement by Banco BPM S.p.A, with headquarters in Piazza Filippo Meda no. 4, 20121 Milano, Italy.

Distribution commission of €34.7m (2023: €19.7m) was incurred during 2024, in relation to the distribution agreement signed with Banco BPM S.p.A in 2018.

At the year-end investments for the benefit of life assurance Policyholders who bear the investment risk were held for a total amount of €3,429m (2023: €2,346m) of which €360.6m (2023: €363.6m) are represented by bonds issued by Banco BPM S.p.A., the Company has accrued interest for €2.9m and received interest for €4.7m.

At year-end, the Company held Cash and Cash Equivalents for a total amount of €22.6m (2023: €21.1m) of which €4.1m (2023: €2.9m) are represented by Cash held with Banco BPM S.p.A. accounts. The Company as at 31 December had a credit line with Banco BPM S.p.A. of €42m (2023: €42m), which is yet to be drawn down. For 2024, on this cash positions with Banco

BPM S.p.A., the Company received bank interest for €0.1m and has paid bank charges for €0.2m.

B.1.3 Role and responsibilities of the core functions

The following core functions are established in the Company:

- Internal Audit, which is responsible for assessing the completeness, functionality, reliability and adequacy of the internal control system and risk management. Checking both on an ongoing basis and in relation to specific needs and respecting the international standards, the operation and the suitability, through an audit plan approved by the Board of Directors, based on a structured process of analysis and prioritisation of the main risks;
- Risk Management, which has the responsibility to oversee the identifying, mitigating, measuring, assessing and monitoring of the current and future risks on an ongoing basis at an individual and aggregate level to which the Company (and their interdependencies) is or could be exposed.
- Compliance and Anti-Money Laundering Department, which is responsible for assessing, according to a risk-based approach, the adequacy of the procedures, processes, policies and internal organisation in order to prevent the risk of non-compliance, or the risk of incurring legal or regulatory sanctions, material financial losses or reputational damage as a result of violations of mandatory rules (laws, regulations, the Supervisory Authority rulings) and self-regulation (for instance statutes, codes of conduct, codes of corporate governance, internal policies and corporate communication documents).
- Actuarial Function, which has the main task to verify - based on the principles of Solvency II - the adequacy of technical reserves, ensure appropriateness of the methodologies, underlying models and assumptions used in calculation of Technical Provisions, assess the sufficiency and quality of data used in calculation of Technical Provisions, compare best estimates against experience, inform on the reliability and adequacy of the calculation of Technical Provisions, express an opinion on the Overall Risk and Solvency Assessment ("ORSA") report, on the overall underwriting policy, on the adequacy of reinsurance arrangements and contribute to the effective implementation of the risk management system.

As part of the internal control system and risk management, it is essential to ensure the interaction between corporate control functions, as well as regular information flow between these functions and the governing bodies.

The corporate control functions shall report a plan of activities annually to the Board of Directors and inform the Board of Directors on the activities carried out along with the main elements of weaknesses found, and on any proposed interventions. In addition, in the performance of consulting support and proposals relating to the internal control and risk

management system, the Risk Committee and the Audit Committee receive a plan and periodic updates by the control functions regarding its activities.

The Actuarial Function reports directly to the Board of Directors and has the necessary independence and separation in the performance of their duties in order to avoid conflicts of interest.

In order to allow the activities to be carried out, the Actuarial Function has unrestricted access to business data and to all relevant information.

The Actuarial Function produces a written report at least annually for the Board of Directors, which documents all the tasks carried out by the same and the relative results, clearly identifying any significant deficiencies, including those relating to data quality, and making recommendations on how to remedy them. The Actuarial function also report promptly to the Board about any findings of the activity that can have a significant impact on the financial position of the Company.

B.1.4 Remuneration policy

The primary objective of the remuneration policy is to ensure fair remuneration, appropriate to the role, responsibility, level of professionalism and individual capacities. In accordance with the legal and regulatory provisions, the Company's remuneration policies ensure consistency between the remuneration of the recipient and sustainable performance requirements, in accordance with a healthy and prudent risk management policy in line with strategic objectives, profitability and the balance of the Company and the Group in the long term. The Company avoids remuneration policies based exclusively or predominantly on short-term results to avoid encouraging excessive risk exposure.

The various remuneration components are combined to ensure an appropriate and balanced remuneration package that reflects the business unit, the employee's rank in the Company and professional activity as well as market practice.

The four remuneration components are:

- fixed remuneration;
- performance-based remuneration;
- defined contribution pension schemes;
- other benefits.

The fixed remuneration is determined on the basis of the role of the individual employee, including responsibility and job complexity, performance and local market conditions.

The performance-based remuneration motivates and rewards high performers who perform beyond expectations, generate quality for customers and shareholder value. The Company agreed a pre-defined performance-based amount on each employment contract. That amount is defined in a way so as not to promote excessive risk taking.

Performance-based remuneration is awarded in a manner which promotes sound risk management and does not induce excessive risk-taking. This is done by ensuring:

- an appropriate balance between fixed and performance-based components;
- that the fixed component represents a sufficiently high proportion of the total remuneration to make non-payment of the performance-based component possible;
- that the performance-based component is based on the achievement of pre-agreed KPIs, which reflect the risk appetite of the Company and the nature of the role being undertaken. The KPIs cover the following:
 - profit before tax compared with budget;
 - cost trend;
 - compliance with the Company's framework of control as documented in the internal business procedures.

Pension schemes guarantee employees a basic cover in the event of illness or death, and a suitable pension payment on retirement.

Other benefits may be awarded on the basis of individual employment contracts.

Members of the Board of Directors receive a fixed fee. Board members are not covered by incentive programmes and do not receive performance-based remuneration. The basic fee of a Board member is set at a level that is on par with the rest of the market and reflects the qualifications and contribution required in view of the Company's complexity, the extent of the responsibilities and the number of board meetings. No pension contributions are payable on, Board members' fees.

Directors, who are also employees of the Company, or other Companies related to it, are not compensated for their services as Directors.

From time to time the Board will review the amount of compensation paid to Directors and committee members. In this regard, the Board may request that management report to it periodically on the status of the Board's compensation in relation to other similarly situated companies. The Company believes that an alignment of director interests with those of shareholders is important. The remuneration of the Directors has to be ratified by the Annual General Meeting.

B.2 Fit and proper requirements

The Board of Directors has adopted, at its meeting on 10 December 2014, in accordance with the Central Bank Reform Act 2010 and the Guidance for (Re)Insurance Undertakings on the Fitness and Probity, the policy on the eligibility requirements for the position (the "Fitness and Probity Policy"). The Policy describes, inter alia, the procedures for assessing the eligibility requirements for the position, in terms of integrity, professionalism and independence, as well as the absence of impediments, of suspension and of incompatibility, of the key function under Solvency II.

This policy came first into effect on 1st January 2015, and it is reviewed annually.

The last review of the policy has been approved by the Board of Directors on 3rd April 2024.

The latest review of the Policy incorporates the regulatory requirements set forth by the Central Bank (Individual Accountability Framework) Act 2023 (No. 5/2023) (IAF), the 2023 CBI Fitness and Probity Standards, and the 2024 Certification Regulation (S.I. No. 2 of 2024 - Central Bank Reform Act 2010 (Section 21(6)) Regulations 2024).

With regard to the independence requirements of its members, the Board carries out its assessments having regard to the provisions set out in the regulation mentioned above, with particular consideration to the following:

- any financial or other obligation the individual may have to the Company or its Directors;
- whether the individual has been employed by the Company or a group undertaking in the past and if so, in what capacity;
- any additional remuneration received in addition to the director's fee, related Directorships or shareholdings in the Company; and
- any close business or personal relationship with any of the directors or senior employees of the Company.

The Board shall state its reasons if it determines that a director is independent notwithstanding the existence of relationships.

The Company must ensure that a person carrying out a PCF/CF is competent and capable. The person shall have the qualifications, experience, competence and capability appropriate to the relevant function. The person shall also have a sound knowledge of the business, of the specific responsibilities that are to be undertaken and a clear and comprehensive understanding of the regulatory and legal environment appropriate to the function.

The Company must also carry out due diligence in accordance with the Guidance which includes obtaining and keeping:

- Evidence of professional qualification(s);
- Evidence of CPD Self-Certification, where relevant;
- Record of interview and application;
- Record of previous experience;
- Details of concurrent responsibilities (Directorships/employment conflicts).

Individuals proposed for CFs or PCFs must be honest, diligent and independent-minded and must act ethically and with integrity. Probity may also include individuals ensuring that they act without conflicts of interest. The person must be able to demonstrate that his/her ability to perform the relevant function is not adversely affected to a material degree by any of the circumstances (the Circumstances) listed in the Guidance.

The Company is required to carry out due diligence in accordance with the Guidance to assess a person's probity to perform a CF(s). Such due diligence will include;

- Obtain signed written confirmation from the person performing or proposing to perform a CF as to whether or not any of the Circumstances apply to that person. If any of the Circumstances apply, the person must demonstrate that his or her ability to perform the CF(s) is not adversely affected to a material degree by that matter(s); the Company should require from the person the underlying documents related to the matter and make an assessment, to be documented, as to whether the matter is material to the performance of the CF. It is not required to remove or suspend a person from acting in a CF solely on the basis that one of the Circumstances may have occurred;
- Central Bank's website search (and those of other regulatory authorities, where available) to confirm that the person has not been the subject of sanctions or other regulatory actions;
- Check Companies Registration Office records for restrictions or disqualifications from acting as Company Director;
- Require those performing CFs to confirm whether, to the best of their knowledge, the person, or any business in which the person held a position of responsibility or influence has been or is being, in any jurisdiction, investigated, disciplined, censured, suspended, or criticised by a regulatory or professional body, a court or tribunal or any similar body, whether publicly or privately;
- Check against publicly available sources, if the person is or has been the subject of a bankruptcy petition, whether in the State or elsewhere. If the person has lived outside the State for more than six months in the previous five years, the Company should request that the person provides a check from a publicly available source in relation to judgement debts from that other jurisdiction(s);
- Check for convictions for criminal offences that could be relevant to the person's ability to perform the relevant function. The Company must ensure that it is satisfied that the person is fit and proper having regard to any conviction for a "relevant" offence; in assessing the impact of the conviction the Company shall consider the circumstances surrounding the conviction, the length of time since the conviction, the explanation offered by the convicted person and any evidence of the individual's rehabilitation.

A record of persons performing CFs and PCFs must be maintained, and all the due diligence undertaken needs to be documented having regard to the obligations under Data Protection law including ensuring that the information is held securely and in an appropriate manner. These records should be made available for review by the Central Bank at their request. The Company must maintain all information collected for the duration during which the person performs CF or PCF as required by the regulation.

Performing due diligence for persons in CFs and PCFs roles is not a one-off obligation; the Company shall require persons performing CFs to notify the Company of any material changes in respect of initial due diligence carried out while the Company shall carry out an audit on an annual basis asking persons in CFs and PCFs to confirm whether they are aware of any material

developments in relation to their compliance with the Standards of which the Company ought to be aware.

Where the PCF/CF is outsourced to a regulated third-party service provider (which includes entities authorised in any country by an authority that performs functions comparable to those performed by the Central Bank) and the function is performed according to a written outsourcing agreement, the Standards will not apply.

However, where a PCF/CF is outsourced to an unregulated third-party service provider the Standards will apply. A written agreement must be in place between the Company and the unregulated third-party service provider, and this agreement must identify the individual in the service provider who is responsible for the performance of the PCF/CF.

The unregulated third-party service provider is required to assess whether the person performing the PCF/CF is compliant with the Standards and they must obtain that person's agreement to abide by the Standards. Where the Company enters into an outsourcing arrangement with an unregulated third-party service provider it remains responsible for compliance obligations.

The Board of Directors assesses the requirements on an annual basis, according to the principles and criteria set in the policy.

B.3 Risk management system, including internal assessment of risk and solvency

B.3.1 Risk Management System

The risk management system is the set of processes and tools used to support the risk management strategy of the Company and allows an adequate understanding of the nature and significance of the risks to which the Company is exposed to. The risk management process is defined, into the following phases:

- identification of risks, which is the identification of significant risks, for instance those risks whose consequences may threaten the solvency or reputation of the Company or constitute a serious obstacle to achieving its strategic objectives;
- evaluation of exposure (current and prospective) to risks (Own Risk Solvency Assessment, "ORSA"), which is carried out through the use of methodologies provided by regulations and best practices with regard to the risks for which the measurement is not regulated or defined by high-level principles;
- monitoring of exposure to risks and reporting, implemented system - based on the principles of completeness, timeliness and effectiveness of the information - in order to ensure an early and continuous monitoring of the evolution of the risk profile and compliance with the defined Risk Appetite. This system ensures that the quality and quantity of the information provided are commensurate with the needs of different audiences and complexity of managed business, in order to be used as a strategic and operational tool for the evaluation of the possible impacts of decisions on the risk profile and solvency;

- mitigation of risks, which consists of identifying and proposing actions and interventions necessary and / or useful to mitigate the risk levels present or prospective that are not in line with the risk objectives defined within the company.

In the Risk Management System, the Risk Management Department has the responsibility to ensure all business units are identifying, mitigating, measuring, assessing and monitoring the current and future risks on an ongoing basis at an individual and aggregate level to which the Company (and their interdependencies) is or could be exposed. The Risk Management Department is responsible for the design, implementation, development and maintenance of systems for assessing and controlling risks.

The risk management system is based on the logic of Enterprise Risk Management ("ERM"), which is based on an integrated perspective of all current and future risks which the Company is exposed to, assessing the impact these risks may have on the achievement of the strategic objectives.

To pursue these high-level goals, the approach takes into account the need to balance multiple instances from key stakeholders. In particular, the risk management system is designed to reflect:

- the need to safeguard the net worth and reputation;
- the safety and solvency requirements;
- the need to diversify risks and to ensure sufficient liquidity.

Risk Appetite

The Risk Appetite is formalised through the Risk Appetite Statement, indicating the risk that the Company intends to take or avoid, setting the limits in terms of quantity as well as quality criteria to be considered for the management of not quantified risks.

The Risk Appetite can be fixed as a single measure (target) or as a range of possible values (range) and is divided into quantitative and qualitative elements.

The determination of the risk appetite is divided, in quantitative terms, according to the following elements:

- risk capital;
- capital adequacy;
- liquidity.

These are defined as objectives in terms of quality with regard to non-compliance risk, strategic risks, reputational and emerging risks and operational risk.

Risk Appetite Framework

The Risk Appetite fits within a frame of reference, the Risk Appetite Framework ("RAF"). The RAF is defined strictly in line, and in a timely connection with the; business model, strategic plan, ORSA process, budget, organisation and internal control system. The RAF defines the Risk Appetite and other components that allow the management, both in normal conditions, and under stress conditions. These components are:

- the Risk Capacity;
- the Risk Tolerance;
- the Risk Limit (or risk operating limits);
- Risk Profile.

The definition of the RAF components is dynamic over time and reflects the management objectives of the risks related to the Strategic Plan objectives. It is verified annually as part of the process of assigning budget targets. Further analysis for the purpose of preventive control of the Risk Appetite, in particular capital adequacy, is carried out on the occasion of extraordinary transactions (mergers, acquisitions, sales, etc.).

Risk Management Policy

The Risk Management Policy, adopted by the Board of Directors and subjected to periodic updates, the last of which occurred on the 9 December 2024, which defines, the appropriate guidelines for identification, evaluation, monitoring and mitigation of risks and operational limits consistent with the defined Risk Appetite. The company ensures that the Risk Management Policy is implemented in a manner consistent and continuous within the entire Group policy, taking into account the risks of each company inside the perimeter of the supplementary supervision as well as the mutual interdependencies.

As a whole, the principles and processes of the Risk Management System are regulated in the following policies: "Risk Management Policy" and "Operational Risk Management policy".

B.3.2 Internal assessment of risk and solvency

The process for conducting the current and prospective risk assessment is outlined in the current ORSA Policy, adopted by the Board of Directors and subject to periodic updates, the latest of which took place on 3 April 2024, and which defines tasks, roles and responsibilities of the function involved.

Through assessment of risk and solvency, the Company intends to pursue the following objectives:

- highlight the link between the business strategy, the process of capital allocation and risk profile;
- give a general overview of all the risks faced by the Company, or that might impact the Company in the future, and its solvency position, current and future;
- provide the Board of Directors and top management feedback on the design and effectiveness of the risk management system and also highlighting any shortcomings and suggesting mitigation actions.

In particular, with reference to the current evaluation, the achievement of these objectives is determined through:

- the measurement of Solvency II capital requirement;
- the assessment of the capital adequacy of the company.

With reference to the valuation perspective, the above objectives are pursued through the ORSA, which allows the analysis of the risk profile of the Company on the strategy, the market scenarios and developments in the business.

When setting the ORSA process, the Company was guided by the following principles:

- the evaluation of the risks for the Company;
- the ORSA, apart from being a regulatory requirement, supports operational and strategic decisions; the ORSA and strategic planning processes are closely linked;
- the estimates taken as reference for the development of the Strategic Plan are at the basis of ORSA prospective evaluation;
- the ORSA evaluation is a support to the preparation/revision of the Strategic Plan;
- the ORSA process considers all the main risks that can lead to a significant reduction in the Own Funds or have impact on the ability to meet commitments towards the policyholders, in line with the risk management policy. For risks not included in the calculation of capital requirements under the first Pillar of Solvency II, the Company provides a qualitative assessment. Therefore, the assessment of these risks is carried out, to verify the effectiveness of control measures in place and the proper functioning of the management and monitoring processes, rather than to quantify the possible loss.
- the ORSA process is carried out in compliance with the standards provided by the Data Quality Management Policy, also adopted by the Board of Directors and subject to periodic updates, the latest of which took place on the 03 April 2024.

The evaluation of Risk Tolerances monitors the indicators defined in the Risk Appetite Statement and is carried out at least quarterly and, whenever circumstances that could significantly alter the risk profile arise. Such circumstances are primarily attributable to extraordinary events, that provide evidence of the need to perform additional ORSA assessment compared with the standard schedule.

The preparation of ORSA and the reporting activities starts after the closing of the reporting period and is finalised within timelines set out by the regulations.

The ORSA process is an integral part of the risk management system and decision-making of the Company and therefore has points of contact with other core business processes such as:

- strategic planning and capital allocation;
- definition of Risk Appetite;
- monitoring and mitigation of risks.

The ORSA process goes through a strict governance process involving all aspects of the Company including the business planning process, risk management process and capital management process. The Risk Committee plays a key part in setting and approving the material risks which form the basis of the company specific scenarios in the ORSA. The ORSA is approved by the Board of Directors where all parts of the ORSA are considered before approval including the need for any management actions.

B.4 Internal Control System

The system of internal control and risk management is a key element of the corporate governance system; it consists of a set of rules, procedures and organisational structures which aim to ensure:

- the effectiveness and efficiency of business processes;
- the proper containment of current and future risks;

- prevention of the risk that the company is involved, even unintentionally, in illegal activities, especially those related to money laundering, usury and the financing of terrorism;
- prevention and proper management of potential conflicts of interest with Related Parties and Connected Persons, as identified by the relevant regulations;
- verifying the implementation of corporate strategies and policies;
- safeguarding the company's assets, even in the medium to long term, and the good management of those held on behalf of customers;
- the reliability and integrity of information provided to corporate bodies and the market and IT systems;
- the adequacy and timeliness of the business information reporting system;
- the compliance of the company and of the operations carried out on behalf of customers with the law, supervisory regulations, self-regulatory standards and internal rules.

The Company implements an articulated and efficient internal control and risk management system, taking into account the different applicable regulations and the various fields of activity, consistent with the guidelines provided by the parent, with the aim of ensuring that the main risks relating to its activities are properly identified, measured, managed and controlled.

The system of internal control and risk management is an integral part of the Company and must spread through all its areas and functions, involving every resource, each for their own level of competence and responsibilities, to ensure steady and effective risk management.

The system of internal control and risk management is defined in the risk management policy, internal audit policy and Compliance policy adopted by the Company's Board of Directors and subject to periodic updates. The last update, in 2024, includes the alignment of the Company Policies with the Banco BPM Group Policies.

Furthermore, to advance the harmonisation with the Group, the Company has adopted in March 2025 the Group "Integrated Internal Control System Policy".

The Board of Directors is responsible for the internal control system and overall risk management, which periodically carry out checks on the adequacy and effectiveness of its functioning. It approves the policy for the evaluation of the current and perspective risks and management of risks that are the basis of the internal control system and the same risk management. It also ensures that the main business risks are identified, evaluated prospectively and adequately controlled. The Board must also approve an organisational structure that guarantees the separation of roles in the performance of the process activities, the traceability and visibility of the operations and the transparency of the decision-making processes involved in each operating process.

The internal control system and risk management is set according to the guidelines outlined below:

- *separation of duties and responsibilities*: the skills and responsibilities are allocated among the corporate bodies and structures clearly, in order to avoid gaps or overlaps

that may affect business functionality;

- *formalisation*: the work of the same administrative bodies should always be documented in order to allow control over the management and the decisions taken;
- *integrity, completeness and correctness of the data stored*: the data recording system and the related reporting procedures must ensure that they have adequate information about the elements that can affect the risk profile of the company and on its solvency;
- *independence of the controls*: the necessary independence of the inspection structures with respect to the operating units must be ensured.

The system of internal control and risk management is regularly subjected to evaluation and review in relation to development of the business and the reference context.

The internal control system and risk management are divided up into several levels:

- line controls ("first level controls"), aimed at ensuring the proper conduct of operations. They are carried out by the operational structures (for instance hierarchical controls, systematic and random), even across different units which report to the heads of operational structures or are executed as part of the back-office; they are incorporated in IT procedures as much as possible. The business units are the first responsible for the risk management process and must ensure compliance with the procedures adopted and compliance with the tolerance level established at risk;
- controls on risk and compliance ("second level controls"), which have the aim of ensuring the correct implementation of the risk management process, the implementation of activities entrusted to them by the risk management process, respect the operational limits for the various functions and compliance with corporate operations standards. The business functions assigned to these controls are distinct from operational ones; they contribute to the definition of governing policies of risks and of the risk management process;
- internal audit ("third level controls"), checks on completeness, functionality and adequacy of the internal control system and risk management (including the first and second level) as well as the consistency with company operations thereto.

As part of the internal control system and risk management, the efforts of assessing the organisation and its internal procedures are necessary to prevent the risk of non-compliance – i.e., the risk of incurring legal or administrative sanctions, financial losses and reputational damage as a result of violations of laws, regulations or supervisory authority measures or self-regulation - and is attributed to the Compliance function. The compliance operational process is divided into the following phases:

- regulatory analysis;
- assessment of risk;
- identification of remediation actions;
- monitoring;
- reporting.

The approach adopted by the Compliance Department, according to the assessment: (i) is related to the enactment of new regulations, new projects, products or processes; (ii) relates to provisions external regulations or self-regulation in force.

Evaluations of the first type (ex-ante evaluations) are primarily designed to support senior management in the activity of adaptation in the face of new projects / products / processes / regulations, while those of the second type (ex-post evaluations) are designed to represent the level of compliance of the procedures, processes, policies and internal organisation of the Group Companies to the applicable law, as well as the risk of non-compliance.

Ex-ante evaluations

Ex-ante evaluations are carried out for: i) external events, such as the enactment of new regulations applicable to undertakings by the European Legislator National Supervisory Authorities, etc. or ii) for internal events, such as the proposal made by the management of new projects, new products or the development of new operating processes.

These evaluations are usually provided as part of the annual planning of the Compliance Function and scope of intervention is chosen on a basis of priority that aims to favour the significance and nature of impacts (including reputational) of the regulations (or process innovations or product provided) with respect to the organisation and to the company's business model. Ex-ante evaluations may also be undertaken in the face of extraordinary requests from the Supervisory Authority, the governing bodies or management.

Ex-post evaluations

The ex-post evaluations may concern business processes ("process assessment") or external supervisory regulations and self-regulation. These evaluations are usually provided as part of the annual planning process, according to a criterion of priority that aims to focus on:

- the need to "cover" all business processes;
- the results of previous ex-ante and ex-post evaluations;
- the need to "cover" the supervisory regulations, in consideration of the importance and complexity of the same;
- risk assessment in relation to regulations which are the subject of particular attention by regulators and supervisory authorities, or that could be subject to sanction;
- the time elapsed since the last analysis carried out by the Compliance and Anti-Money Laundering Control Function and other functions in relation to the relevance of the legislation in question;
- data on complaints received and sanctions, if any.

The ex-post checks can be initiated to cover findings by the Supervisory Authority, the governing bodies or management.

B.5 Internal Audit Function

The Internal Audit Function is an independent and objective assurance and consulting activity designed to add value and improve the Company's operations. It helps the Company accomplish its objectives by bringing a systematic and disciplined approach to evaluate while also improving the effectiveness of risk management, control and governance processes. The Internal Audit Function is established by the Audit Committee, a sub-committee of the Board of Directors. The ongoing monitoring, reporting and control of the Internal Audit Function within the Company is the responsibility of the Head of Internal Audit who reports to the Board of Directors through the Audit Committee. At each individual audit, the Internal Audit Function should:

- draw up the audit objectives to be conducted on the process being audited;
- where necessary, hold a kick-off meeting with the process owner(s) for the audited process;
- carry out process analysis work and conduct relevant testing;
- draw up the draft Audit Report;
- where necessary, hold an exit meeting with the process owner(s) for the audited process in order to discuss any findings which have come to light and to ask management to commit to fixing deficiencies detected, indicating due dates and the responsible person(s);
- send the official Audit Report to the process owner(s);
- periodically monitor the status of the arrangements to which management has committed;
- carry out relevant follow-up and report progress to each audit committee meeting of the intervening audit in order to check that the corrective actions have actually been implemented;

The Internal Audit Function will remain free from interference by any element of the Company, including matters of audit selection, scope, procedures, frequency, timing, or report content to permit maintenance of a necessary independent and objective mental attitude. Internal auditors will have no direct operational responsibility or authority over any of the activities audited. Accordingly, they will not implement internal controls, develop procedures, install systems, prepare records, or engage in any other activity that may impair their judgement. Internal auditors must exhibit the highest level of professional objectivity in gathering, evaluating and communicating information about the activity or process being examined. Internal auditors must make a balanced assessment of all the relevant circumstances and not be unduly influenced by their own interests or by others in forming judgments. The Head of Internal Audit will confirm to the Board of Directors through the Audit Committee, at least annually, the independence of the Internal Audit Function.

B.6 Actuarial Function

The Company has appointed an Actuary employed by Willis Towers Watson, working in the capacity of external actuarial consultant and Actuarial Function Holder for BBPM Life dac.

The Solvency II requirements of the Actuarial Function, as specified in Article 48 of the Solvency II Directive, are as follows:

- Coordinate the calculation of the Technical Provisions;
- Ensure appropriateness of the methodologies, underlying models and assumptions used in calculation of Technical Provisions;
- Assess the sufficiency and quality of data used in calculation of Technical Provisions;
- Compare best estimates against experience;
- Inform on the reliability and adequacy of the calculation of Technical Provisions;
- Express an opinion on the overall underwriting policy;
- Express an opinion on the adequacy of reinsurance arrangements; and
- Contribute to the effective implementation of the risk management system.

The additional major tasks carried out by the BBPM Life Actuarial Function are:

- calculate the Solvency Capital Requirement ("SCR"), the Minimum Capital Requirement ("MCR") and the Risk Margin on an outsourced basis;
- Carrying out independent validation of the base financial projections included in the ORSA;
- Express an opinion on the ORSA;
- Contributing to new product development.

The Delegated Regulations require that the Actuarial Function should prepare a report for the Board, at least annually, documenting the tasks, and their results, carried out by the Actuarial Function.

In addition, the Central Bank of Ireland requires that the Actuarial Function should provide an opinion to the Board of the Company regarding:

- The reliability and adequacy of the calculation of Technical Provisions
- The sufficiency and quality, including appropriateness, completeness and accuracy, of data used in the calculation of Technical Provisions
- The appropriateness of the methodologies, models and assumptions used in the calculation of Technical Provisions.

The Chief Risk Officer (CRO) is responsible for the overview of the outsourced Actuarial Function. The CRO will contribute to discussions on methodology and assumptions used in calculating the Technical Provisions and SCR of the Company. The CRO will also review the calculations of the Technical Provisions, Risk Margin and SCR.

B.7 Outsourcing

The guidelines for outsourcing are defined in the policy on outsourcing ("Outsourcing Policy") of the Company, adopted by the Board of Directors and subject to periodic updates, the last of which took place on the 3 April 2024. The policy rules the decision making, the responsibilities, the tasks and controls expected in terms of outsourcing of activities and business functions.

The policy specifically states:

- criteria for the identification of activities to outsource;

- criteria for the qualification of activities as essential or important and important operational functions;
- burden on outsourcing;
- the selection criteria of the Outsourcer;
- the decision-making process to outsource functions or company's processes;
- the minimum content of the outsourcing contracts and the criteria to define service levels of outsourced activities;
- internal information flows to ensure that the various functions have full knowledge and governance of risk factors related to the outsourced functions;
- guidelines to follow in case the service providers do not comply with the agreement, including guidance on contingency plans and exit strategies in case of outsourcing of essential or important activities;
- Supervisory Authority notification.

Essential or important functions or activities are those that meet at least one of the following conditions:

i) an anomaly in their execution or their failed execution may severely damage:

- the financial results, the solidity of the Company or the continuation and the quality of the provided services;
- or
- the ability of the Company to continue to comply with the requirements for keeping its authorisation for carrying out its activity or with the requirements set by the applicable supervisory rules;

ii) concern operational processes of the corporate supervisory functions or have a significant impact on the management of the company's risks.

For the purpose of categorising the activities or functions as essential or important, the economic activity importance and the volumes of the same compared to the total volumes and the degree of autonomy of the supplier in the performance of activities included in the outsourcing contract can be taken into account as additional elements for assessment.

The Company may enter into outsourcing agreements provided that the nature and quantity of activities to outsource, as well as the conditions of the assignment do not:

- result in the Company being drained of activity;
- delegate its responsibility or liability of corporate bodies;
- compromise the quality of the internal supervisory and governance systems of the Company;
- outsource corporate control functions outside the Group;
- modify the relationship and obligations towards customers;
- jeopardize its ability to fulfil its obligations under the regulatory provisions or be in a position to violate the reservations of activities provided by law;
- impede the supervision of the Company;
- outsource the underwriting of risks.



The outsourcing of critical and important functions, identified according to the criteria mentioned above, must be previously notified to the Supervisory Authority.

The table below gives information related to the essential or important functions or activities outsourced and the jurisdiction in which the suppliers of those functions or activities are located.

Table B1 – Outsourced Activities

Outsourced essential or important activities	Name of the provider	Legal Office
Third Party Administrator	FNZ (Europe) dac	Block C, Irish Life Centre, Lower Abbey Street, Dublin 1, Ireland
Actuarial Function	Willis Towers Watson	Elm Park Business Campus, Merrion Road, Dublin D04 P231, Ireland
IT Network Administrator	Ekco Cloud Limited	Heather House, Heather Road, Sandymount, Dublin 18
Asset Management	Anima SGR S.p.A.	Corso Garibaldi 99, Milano, Italy
IT Disaster Recovery	Savenet Solutions LTD	Unit 1A, Hume Centre, Park west Industrial Estate, Dublin 12, Ireland
Services	Generali Italia S.p.A.	Via Marocchesa 14 Mogliano Veneto 31021
Front End Services	Be Shaping The Future DigiTech Solutions S.p.A.	Via Viale dell'Esperanto, 71, Roma, Italia
Policy Administration	FDM Business Services S.r.l. a socio unic	Via Valtorta, 47, 20127 Milano MI, Italy
Subscription and redemption of Funds	Allfunds Bank S.A.U.	Calle de Los Padres Dominicos 7, 28050, Madrid
Cloud services.	Microsoft Ireland Operations Limited	70 Sir John Rogerson's Quay, Dublin 2, Dublin, D02R296

B.8 Other Information

The Board of Directors examined the adequacy of the organisational, administrative and accounting structures and, in particular, the Internal Control System and the Company's risk management, based on the periodic reports of the management. The board and committees pack are usually made available to the Directors in the days before the meetings, with appropriate highlighting of the main contents on the agenda (Executive Summary), except in cases of urgency and / or precautionary confidentiality requirements. Such documentation is made available in computer readable form which allows a more efficient management both in terms of saving time and high standards of confidentiality.

C. Risk Profile

C.1 Life Underwriting risk

Life Insurance Technical Risks

The underwriting risk for life insurance is the risk arising from life insurance obligations, taking into consideration the covered events and the processes used in the activity.

The portfolio of the Company consists exclusively of Unit-Linked Life Insurance products and the total Best Estimate as at the 31 December 2024 are €3,385m.

The Company's portfolio is exposed to the following risk factors:

- **mortality risk:** linked to an unfavourable deviation in the demographic bases resulting from experience (over-mortality) with respect to what was used in the determination of the pricing;
- **lapse risk:** linked to adverse changes in the level or volatility of the incidence of lapses, withdrawals, early surrenders and terminations in the payment of premiums;
- **expense risk:** linked to adverse changes in the value of expenses related to insurance policies with respect to what was used in the determination of the pricing;
- **catastrophe risk:** resulting from an unforeseeable event that consequentially strikes multiple people, producing a number of claims significantly higher than expected.

The Company evaluates the solvency capital requirement using the SII Standard Formula approach. With reference to the year-end 31 December 2024 you may find below the details of the Life Risk sub-modules of the SCR.

Table C1- SCR – Life Risk Sub-Modules

Risk Sub-Modules (€'000)	2024	2023	Change %
Mortality Risk	941	621	52%
Longevity Risk	-	-	
Disability-Morbidity Risk	-	-	
Lapse Risk	27,393	16,114	70%
Expenses Risk	5,884	4,777	23%
Revision Risk	-	-	
Catastrophic Risk	434	300	45%
Total Sub-Modules	34,652	21,812	59%
Diversification Effect	(3,709)	(2,717)	(37%)
Total Life SCR	30,943	19,095	62%

The main source of risk within the Life Risk sub-module is Lapse Risk, which accounts for 79% of the non-diversified Life Insurance Risk. In comparison with previous year the main change in the sub module is represented by an increase to the lapse risk due to an increase in the value-in-force (VIF) of the Company which when stressed increases the mass lapse risk.

Risk mitigation techniques

The company has a limited appetite for mortality risk, the terms of which are set out in the policy documentation. These are based on age and an overall limit per individual. The mortality risk within the products is reviewed by the Actuarial Function and Board and mortality assumptions included as part of product pricing are based on actuarial data. In addition, the company reinsures part of this risk which limits the mortality risk to the Company for any one policy and any one policyholder.

C.2 Market risk

Market risk refers to all the risks which result in impairment of financial investments or Property due to adverse developments of the relevant market variables:

- **Interest rate risk:** the risk of a loss in value of a financial asset in the portfolio in relation to movements in market interest rates;
- **Equity risk:** the risk linked to losses due to movements in share prices;
- **Exchange rate risk:** the risk of possible losses on foreign currency positions in the portfolio due to changes in exchange rates;
- **Spread Risk:** the risk associated to a possible increase of spreads required by the market to a debtor;
- **Concentration risk:** additional risk due to limited diversification of financial asset portfolio leading to high exposure to default risk from individual financial instruments issuers; and
- **Property risk:** is the risk linked to losses due to adverse movement in the prices of assets classified as property.

The Policyholder financial portfolio at 31 December 2024 is made up of 21% bonds, 7% of which are government bonds, the investment in Undertakings for the Collective Investment of Transferable Securities is 77% of the portfolio with the balance of 2% in cash.

Table C2 – Financial Portfolio Composition

	2024 (€'000)	% Exposure to PTF Total	2023 (€'000)	% Exposure to PTF Total	Difference
Property, Plant & Equipment held for own use	2,340	0%	2,556	0%	-8%
Bonds	72,702	2%	57,059	2%	27%
Government Bonds	72,702		57,059		27%
Investments for the benefit of policyholders who bear risk (class III)	3,429,462	98%	2,346,180	98%	46%
Total	3,504,504	100%	2,405,795	100%	46%

All assets, in particular those covering the Minimum Capital Requirement and the Solvency Capital Requirement, shall be invested in a way that ensures the security, quality, liquidity and profitability of the portfolio as a whole.

Given the composition of the financial portfolio the Market Risk is calculated with the Standard Formula. With reference to the year-end 31 December 2024, you may find below the details of the individual sub-modules of the SCR of the market risk.

Table C3 – SCR – Market Risk Sub-Modules

Risk Sub-Modules (€'000)	2024	2023	Difference
Interest Rate	3,417	3,237	6%
Equity Risk	24,289	14,064	73%
Property Risk	5	9	-44%
Spread	1,502	1,129	33%
Currency	8,244	4,600	79%
Concentration			
Total Sub-Modules	37,457	23,039	63%
Diversification Effect	-8,351	-5,801	44%
Total Market SCR	29,106	17,238	69%

The market risk component of the SCR is primarily due to the impact of market stresses on the unit-linked portfolios. The difference between 2024 and 2023 is mainly as a result of:

- The increase in Equity Risk is mainly as a result of an increase in assets under management; and
- The increase in the Currency risk module because the most recent products launched have a greater exposure to currency risk (increased holdings in non-euro assets).

Risk mitigation techniques

The Company does not have any appetite for market risk linked to policyholders' assets other than the indirect exposure via the link between the level of assets under management and the annual management fees received by the Company. The market risk associated with the unit linked assets is borne by the policyholders which is set out in detail in the policyholders' documentation.

The products documentation specifically outlines that the policyholders are subject to any movements in the value of the asset and therefore are subject to the market risk.

C.3 Credit risk

The Credit Risk (Counterparty Default Risk) identifies the risk that a debtor or guarantor fails to comply, fully or partially, to its financial obligation accrued to the Company. Credit risk thus reflects the potential loss due to an unexpected default of the counterparties and debtors of insurance and reinsurance companies in the next 12 months.

The methodology adopted to assess the risk of default is the Solvency II Standard Formula. The portfolio exposed to the Counterparty Default Risk as at 31 December 2024 consists almost exclusively of cash deposited with banks.

Below is the value of the Solvency Capital Requirement in relation to credit risk as at 31 December 2024:

Table C4 – SCR – Credit Risk

Exposure Type	2024			2023			Difference
	Exposure	SCR	% Total TPF	Exposure	SCR	% Total TPF	
Type 1	30,422	1,847	66%	25,221	2,776	82%	(33%)
Type 2	7,443	1,116	40%	5,193	779	23%	43%
Diversification		-179	(6%)		-155	-5%	15%
Total	37,865	2,784	100%	30,414	3,400	100%	(18%)

The contingency plan to manage risk of counterparty default includes diversification of the counterparties used.

C.4 Liquidity risk

Liquidity risk represents the risk of not having the liquid resources needed to meet the financial obligations without having to suffer economic losses from forced asset sales in the event of adverse scenarios.

The Company faces liquidity risk in two specific scenarios, lack of sufficient liquid assets to meet day to day operational liabilities and payment of the Italian substitute tax and stamp duty where the Company does not generate sufficient liquidity through new business and profits on existing business to ensure payment of the tax.

The Company does not seek to take on liquidity risk as a strategic risk. The liquidity risk faced by the firm is in the normal course of its activities as a cross border life assurance undertaking.

The Company strives to maintain liquidity levels to meet the cash requirements arising from day-to-day trading activity and to meet the cash requirements that arise from the payment of the Italian substitute tax.

The main mitigation to safeguard the ability to make the payments of day-to-day expenditure such as corporation tax, exit tax payments, salaries etc is matching of the bond portfolio with the liabilities as they fall due.

There is also a line of credit in place which ensures that this risk is further mitigated and alleviated. However, the main mitigation is holding sufficient levels of liquid assets to pay the liabilities as they fall due as the use of the line of credit is an expensive form of mitigating the risk. The exposure to the liquidity risk associated with the Italian substitute tax is mitigated by a

binding agreement in place with Group which ensures that if there is any shortfall in the exit tax due from policyholders then the Group will meet this shortfall.

The time horizon of the liquidity risk can be split into two main areas i) the short term - ongoing potential delay in bank settlements where the counterparty is not able to settle the trade in the agreed timeframe and ii) the longer-term - payment of the Italian substitute tax where the Company does not generate sufficient liquidity through new business and profits emerging on existing business to ensure payment of the tax.

Gains expected in future premiums

The expected profit included in future premium in accordance with Article 260, paragraph 2 of the Delegated Regulation (EU) 2015/35 is not calculated as the Company does not have policies with regular premium.

C.5 Operational risk

Operational risk means the risk of loss as a result of inadequate or failed internal processes, people or systems, external events such as fraud or the activities of service providers. Part of the operational risks, in terms of the identification and quantitative assessment, are the legal risk, the risk of non-compliance and IT risk, while strategic risk and reputational risk are not included.

As part of the Internal Control System and risk management, the operational risk management system facilitates the achievement of the following high-level goals:

- Preservation of the capital of the Company;
- Improvement of the overall efficiency of the processes ensuring that the potential operational risk is identified, measured, controlled and managed in accordance with methodologies defined and consistent within the Group.

The Company calculates the capital requirement for operational risk through the use of the SII standard formula as reported in the Delegated Regulation (EU) 2015/35.

Below shows the capital requirement for operational risk calculated as at 31 December 2024:

Table C5 – SCR - Operational Risk

Risk module (€'000)	2024	2023	Change %
Operational Risk	4,949	3,823	29%

The identification of operational risk is based on the collection of information on potential events or actual events from all relevant sources of information and classified in a coherent and coordinated way in order to represent a continuous overall database on operational risk.

The identification activity consists of gathering as much information as possible about the event risk, its possible causes and effects. This activity aims to increase the knowledge of risk exposure of the different business areas, assess the adequacy of controls and identify the best solutions for the management of any critical situations.

The process of collection of the *business expert opinion*, carried out through the Risk Self-Assessment (RSA) method, is based on meetings with management in order to identify and

assess the potential operational risk events that can occur, as well as to assess the adequacy of the control system and identify the best solutions to manage potential critical situations.

The data collected includes the impact of the estimated risk event and the estimate of the expected frequency of the occurrence of events considered on an annual basis. The information collected on operational risk events is divided according to the concept of cause - event - effect, in order to accurately describe the chain of events that caused the economic impact due to said risk event.

In summary the phases in which the operational risk identification activities can be divided are the following:

- Analysis of processes, verification of the applicable regulations and collection of the information derived from previous analysis or analysis performed by the controlling functions;
- Identification of possible operational risks, the possible causes and the existing controls;
- Verification of the completeness of the analysis with respect to the model of the event type;
- Validation of the collected data and control of the quality of the performed analysis.

As part of the operational risk, the evaluation of the impacts resulting from the interruption of business processes following the occurrence of a disastrous event (i.e. risk of continuity) is significant.

For this purpose, the Company has a Business Continuity process, with the aim to minimize the impact of disastrous events on the relevant services, whether they are caused by events of sectoral, corporate, local or extended scope (Business Continuity Management).

The Company will manage operational risk to an acceptable level through a combination of sound corporate and risk governance, strong systems and controls and, where applicable, limit and tolerance structures. Regular updating of the risk register is one of the primary methods of mitigating the operational risk and ensuring that operational risks are recognised, measured and reported to the Board of Directors.

C.6 Other substantial risks

As for other risks, the Company identifies the following risks as significant:

- Reputational risk: the current or prospective risk to affect income or capital arising from a negative perception of the company by its major stakeholders.
- Strategic risk: the current or future risk of a decline in profits or capital due to external factors such as changes in the operating environment and / or lack of responsiveness to changes in the competitive environment, or internal factors such as adverse business decisions and / or inadequate decisions. The Board of Directors monitors these risks with a pro-active approach to identify possible trends to prevent emerging risks and take advantage of future business opportunities.
- Group Risk: the risk related to belonging to the Group or risk of "contagion" is the risk that as a result of the interlinked nature of the Group's other entities, difficult situations that arise in an entity of the same group can spread with negative effects on the solvency itself; it also includes the risk of conflict of interests.

- **Regulatory Risk:** the risk of incurring legal or regulatory sanctions, material financial losses or reputational damages as a result of violations of mandatory rules (laws, regulations) or self-regulations (i.e. statutes, codes of conduct, codes of self-regulation); it may also derive from unfavourable changes in the regulatory framework or legal guidelines. The Compliance Function evaluates the adequacy of the organisation and internal procedures for the prevention of such risk and determines their level.

Sensitivity analysis

In order to monitor the sensitivity of the Company's solvency position to risks and material events, the Company has prepared sensitivity analysis. This analysis investigates the sensitivity of the Company's solvency ratio to a selection of key risk exposures.

Sensitivity 1 – Lapse Rates

To analyse the impact of a reduction in the lapse rates, the Value-in-force (VIF) and Solvency Capital Requirements (SCR) were re-calculated under a scenario whereby lapse rates are reduced by 50%.

Sensitivity 2 – Policyholder funds under management

To analyse the impact of an instantaneous reduction in the policyholder funds under management, the VIF and SCR were re-calculated under a scenario whereby market movements lead to an instantaneous reduction in the value of policyholder funds under management of 25%. The Company's solvency position is exposed to a reduction in the funds under management because its future income is a function of the funds under management. The Company's insurance related mortality costs and fund related expenses are also a function of the funds under management.

Sensitivity 3 – Administration Expense Base

To analyse the impact of an increase in the expenses of the company, the VIF and SCR were re-calculated under a scenario whereby the permanent administration expense base is increased by 20%. An increase in expenses will erode future profits that are recognised on the solvency II balance sheet and as a result reduce solvency coverage.

Results of the sensitivities

Table C6 – Sensitivity Results

Scenario	Impact on the central scenario	Impact % on Solvency II VIF (i.e future profits)	Impact % on SCR
Demographic risk - Lapse rates	(50%)	+13%	+24%
Market risk – Unit liability	Instantaneous reduction of 25%	(37%)	(22%)
Life underwriting risk – Administration expense base	+20%	(10%)	(0%)

Sensitivity 1 – Lapse Rates

Under a scenario where lapses rates are reduced by 50%, there is an increase in the Company's SCR. The increase in SCR is primarily as a result of the increase in the future expected profits. The reduction in lapse rates leads to policies remaining in force longer. This results in increased AMC income, but also increased fund related expenses. Surrender penalty income reduces given that lapses are lower. The increased SCR is driven primarily by the greater exposure of the Company to expenses, given that policies are expected to remain in force longer. Equity, spread and lapse stresses (the most material stresses to the Company's SCR) also increase as the Company has a greater level of expected future profits.

Sensitivity 2 – Policyholder funds under management

Under a scenario where market movements lead to an instantaneous reduction in the value of policyholder funds under management of 25%, there is a reduction in the Company's SCR. This reduction in SCR is primarily due to the reduction in the Company's projected future profits (driven by the reduction in policyholder funds under management). This results in reduced AMC and surrender penalty income, offset somewhat by reduced fund related expenses. The reduced projected future income drives reductions in the equity and lapse stresses (the most material stresses to the Company's SCR).

Sensitivity 3 – Administration Expense Base

Under a scenario where the permanent administration expense base is increased by 20%, there is a reduction in the Company's SCR. This reduction in SCR is primarily due to the reduction in the Company's projected future profits (driven by the reduction in policyholder funds under management). This drives reductions in the equity, spread and lapse stresses (the most material stresses to the Company's SCR). However, this is partly offset by an increase in the expense stress.

D. Evaluation for solvency purposes

The calculation of the solvency capital requirement laid down in the SII Directive is determined as the economic capital that insurance and reinsurance undertakings must hold to ensure that the undertakings in question will still be able, with a probability of at least 99.5%, to meet their obligations towards policyholders and beneficiaries over the following twelve months. The capital is evaluated with a balance sheet prepared on the basis of "Market Consistent" criteria, specifically identified in the Regulation. These criteria are generally based on the *fair value* evaluation as defined by international accounting standards (IFRS 13), to be determined on the basis of the following hierarchy:

- i) quoted prices in active markets for the same assets and liabilities;
- ii) quoted prices in active markets for similar assets and liabilities, suitably adjusted to take account of the differences with the assets and liabilities listed;
- iii) evaluations derived from internal valuation models ("Mark to Model"). The data used in these models must derive as far as possible from information implicit in the market valuations of the previous points.

Consequently, the preparation of the Market Consistent Balance Sheet (MCBS) of the Company was made through the following phases:

- restatement of the individual assets and liabilities of the Company on the basis of the classification criteria for compiling the QRT S.02.01 (Balance Sheet);
- evaluation of individual assets and liabilities under the criteria of the Regulations, in accordance, where applicable, with the assessments set out on the purpose of the consolidated financial statements prepared in accordance with IAS / IFRS principles.

Below is the content of the QRT S.02.01.02 (MCBS) prepared with reference to 31 December 2024, which contains a valuation of the assets and liabilities of the Company to market consistent values (Solvency II Value) and a consistent evaluation with that adopted by the Company to prepare its financial statements (Statutory Account).

Table D1 - Market Consistent Balance Sheet (MCBS): Assets

	Solvency II Value	Statutory Account Value
Goodwill	-	
Deferred acquisition costs	-	42,791
Deferred tax assets	-	40
Property, plant and equipment held for own use	2,340	2,340
Investments (other than assets held for contracts index-linked and unit-linked)	72,702	72,702
Bonds	72,702	72,702
Government bonds	72,702	72,702
Assets held for contracts index-linked and unit-linked	3,429,462	3,429,462
Insurance and intermediaries' receivables	50,778	50,778
Receivables (trade, not insurance)	672	672
Reinsurance receivables	-	-
Cash and cash equivalent	22,639	22,639
All other assets not mentioned elsewhere	1,437	1,437
Total assets	3,580,030	3,622,861

Table D2 - Market Consistent Balance Sheet (MCBS): Liabilities

	Solvency II Value	Statutory Account Value
<i>Technical provisions - index-linked and unit-linked</i>	3,394,966	3,445,132
Technical provisions calculated as a whole		
Best estimate	3,384,618	
Risk margin	10,348	
Deferred tax liabilities	7,006	78
Financial liabilities other than debts owed to credit institutions	2,407	2,407
Insurance payables and to intermediaries	33,002	33,002
Reinsurance payables	113	113
Payables (trade, not insurance)	3,720	3,720
All other liabilities not reported elsewhere	1,777	50,143
Total liabilities	3,422,991	3,534,595

Comments on the main differences between the two evaluations are given in the following paragraphs.

D.1 Assets

D.1.1 Evaluation criteria

In this section the criteria, methods and models used by the Company for the detection and measurement of assets in MCBS are illustrated.

Financial assets and liabilities (excluding equity investment) and properties

The financial assets and liabilities are measured at fair value within the hierarchy illustrated in the Regulation. Below you may find the valuation principles of the fair value as it has been adopted by the Company in accordance with IFRS 13.

As per IFRS 13 we use the below Fair Value measurement criteria to:

- define the fair value;
- group into a single accounting standard the rules for measuring fair value;
- enrich financial statement information.

The standard defines fair value as the sale price of an asset based on an ordinary transaction or the transfer price of a liability between market participants at the measurement date and under market conditions (exit price).

The fair value is a market measurement and not an entity-specific measurement; as such, the valuations must be made on the basis of the assumptions and models mainly used by market participants, including assumptions about the risk of the asset or liability being measured. When a market price is not observable, the measurement methods which maximise the use of observable parameters and minimise the use of non-observable parameters must mainly be used.

IFRS 13 defines a fair value hierarchy based on the level of observability of the inputs contained in measurement techniques used to measure fair value.

Deferred Taxes

The calculation of deferred taxes recognised in MCBS was made by applying the criteria identified by the International Accounting Standards (IAS 12).

Other activities

For all other activities not included in the categories set out above, in view of its characteristics, the book value in the MCBS is consistent with the value of the specified purposes of the consolidated financial statements prepared and then by applying the relative IAS / IFRS.

D.1.2 Quantitative information on the valuation of assets

Intangible assets

The Company, in line with the regulatory requirements of the Directive, does not attribute value to goodwill, deferred acquisition cost or other intangible assets, for solvency purposes, as a quotation on an active market for similar assets is not available.

Table D3 - Intangible Assets

	Solvency II	Financial statements	Difference
Goodwill	-	-	-
Deferred acquisition costs	-	42,791	42,791
Intangible assets	-	-	-
Total	-	42,791	42,791

The company held no intangible assets as at end December 2023.

Table D4 - Tangible Assets

	Solvency II	Financial statements	Difference
Property, plants and equipment held for own use	2,340	2,340	-
Total	2,340	2,340	-

Note that, in respect of other tangible assets (e.g. Equipment, plant, Leases, cars, etc.), the book value in the MCBS is consistent with the carrying value in the financial statements, which, given the nature and significance of those assets, it is considered to adequately represent the fair value.

MCBS requires that "Assets held for index-linked and unit-linked funds" includes all financial assets recognised in the class "Financial assets at fair value through profit or loss" of the statutory balance sheet, corresponding to the financial assets for which the investment risk is borne by policyholders (Unit-linked and index-linked).

Table D5 - Financial Assets with Investment Risk borne by Policyholders

	Solvency II	Financial statements	Difference
Assets held for contracts on an index-linked and unit-linked	3,429,462	3,429,462	-
Total	3,429,462	3,429,462	-

These assets are valued at fair value also in the financial statements, consequently there are no differences compared to the corresponding values recorded in the MCBS.

Table D6 - Other Financial Investments

	Solvency II	Financial statements	Difference
Government bonds	72,702	72,702	-
Total	72,702	72,702	-

These assets are valued at fair value also in the financial statements, consequently there are no differences compared to the corresponding values recorded in the MCBS.

Deferred Taxes

The calculation of deferred taxes recognised in MCBS was made by applying the criteria identified by the International Accounting Standards (IAS 12).

Deferred tax is provided on temporary differences between the carrying value of assets and liabilities in the MCBS and their value for tax purposes.

Table D7 - Deferred Tax Assets and Liabilities

	Solvency II	Financial statements	Difference
Deferred tax assets	-	40	40
Deferred tax liabilities	7,006	78	(6,928)
Net total	7,006	38	(6,968)

The differences compared to the figure recorded in the financial statements, are related to the deferred tax effect of temporary differences arising from adjustments of assets and liabilities valuations commented in paragraphs D.1, D.2 and D.3.

Below there is a table summarizing the composition of assets and liabilities for deferred taxes recorded in the MCBS to the nature of the temporary difference that has determined the detection, and a time horizon indication provided for the reversal of the temporary differences themselves.

At the reference date, there are no tax losses or unused tax credits for which the corresponding deferred tax asset were not recognised.

Table D8

Assets / (Liabilities) detail Deferred Tax recognised in the MCBS by temporary differences	Corporate Tax	Timeframes required for the reversal of temporary differences
Technical reserves net life (IFRS adjustments and SII)	6,271	Temporary differences arising from adjustments between statutory account and MCBS
Other assets and liabilities	697	Deferred income and expense over the life of the product.
Total	6,968	

D.2 Technical Reserves

D.2.1 Evaluation criteria

Technical provisions for each material line of business

The Best Estimate and the Risk Margin as at the 31 December 2024 are respectively €3,385m (2023: €2,335m) and €10.3 m (2023: €6.0m).

Methodology

In accordance with what is defined in the Directive, the technical provisions are determined as the sum of a best estimate (Best Estimate of Liability or BEL) and a margin of risk (Risk Margin).

The best estimate liability is made up the following components:

- the policyholder value of best estimate liabilities (i.e. the unit liabilities)
- the value of future profits on the in-force business (i.e. the non-unit liability)

The technical provisions within the Quantitative Reporting Templates (QRTs) also include all pending policyholder claims.

The policyholder unit liabilities are the sum of the value of the unit liabilities for each policy. The value of the unit liability is calculated as the product of the number of units deemed allocated at the valuation date to each policy and the valuation price per unit. The technical provisions also include all pending policyholder claims. This amounts to €16.4m as at 31 December 2024.

The value of future profits is calculated as the expected future shareholder income less outgoings discounted using the relevant term structure of risk-free interest rates. The income is the annual management charge and surrender penalties arising from policyholder lapses. The outgoings comprise of management expenses, investment costs that are met by the shareholder, and cost of mortality claims. The value of future profits has been updated to allow for the cost of future Italian tax prepayments. The tax asset is valued at face value on the Solvency II balance sheet.

The risk margin component of technical provisions is calculated using a cost of capital approach where the cost of capital each year is set at 6% of the capital requirement. The risk margin is equal to the sum of the discounted costs of capital. The capital requirement is the Solvency Capital Requirement.

The Risk Margin is calculated based on the following input data:

- SCR for operational risk;
- SCR relative to credit risks;
- SCR relative to Technical Life Insurance risks quantified according to the different methods of risk assessment;
- estimation of the projected run-off of the above SCR components;
- the risk-free yield curve.

The SCR for market risk is excluded from the calculation as it is assumed that the market risk is hedgeable when calculating the risk margin.

BBPM Life has not developed an internal model. All Solvency II calculations are based on the standard formula approach.

Main assumptions

The key assumptions influencing the technical provisions are:

- Expenses
- Lapses/partial encashments
- Projection term

Mortality assumptions are also used in the calculation of the technical provisions but given the product design mortality is not a key assumption.

Expenses:

Expense assumptions are set according to the Company's expense budget and are split into maintenance and acquisition related expenses. Maintenance expenses are further divided into expenses that relate to the size of funds under management and those that are not fund related. Fund related expenses are calculated as a percentage of the funds under management. The balance of the maintenance expenses is allocated at an individual policy level basis with some expenses being allocated on an aggregate basis.

Expense inflation takes into account the market forecast price inflation based on the ECB long-term inflation forecast with a margin for salary inflation.

Lapses/partial encashments:

The lapse and partial surrender experience over prior years is analysed by the Actuarial Function and BBPM Life management and the results of this analysis are used in determining best estimate future assumptions.

Projection term:

The projection term is set at the term of each product for fixed term policies.

For products with an open-ended term the projection term is set by the company based on its best estimate of the duration of this business.

For whole-of-life products the calculation of technical provisions assumes that they remain in force to age 100.

Mortality:

Mortality is not a material assumption in the context of calculating the technical provisions. Standard mortality tables are used in determining mortality assumptions for the purpose of calculating the technical provisions.

Level of uncertainty:

Uncertainty relates primarily to how actual experience will differ from best estimate assumptions used to calculate technical provisions. The key areas where expert judgements have been used and therefore where there is a level of uncertainty in setting the assumptions relates to setting the following assumptions:

- Lapses - Whilst historic lapse experience has been analysed in setting the assumptions there are various historic factors that may have impacted historic lapse experience, including economic environment and product design, that may not necessarily be repeated in the future.
- Expenses - The breakdown between acquisition and maintenance expenses and the determination of the expenses applied at an individual policy level has also relied on the application of expert judgement. The assumptions are regularly monitored to ensure they remain appropriate and to ensure that the areas of uncertainty are understood and appropriately reflected in the technical provisions.

- The technical provisions included in this report were calculated based on data available as at 31 December 2024. One potential situation that could cause uncertainty:
 - The current economic environment of above target inflation. Inflation is assumed to reduce over the projection period and if this reduction takes longer than expected then this could increase the expenses in the technical provisions.

Solvency II and IFRS valuation differences of technical provisions

The IFRS technical provisions differ from the Solvency II technical provisions for the purposes of the returns to the Central Bank of Ireland. The key points of difference are the following:

- Solvency II assumptions are best estimate assumptions whereas IFRS assumptions have some margins for adverse deviation.
- Solvency II recognises all expected future profits on the balance sheet whereas under IFRS where the reserve is negative, i.e. for 'profitable' policies where the future income expected from the policy exceeds the expected expense outgo, then this negative reserve is set to zero for the purpose of calculating the technical provisions included within the financial statements.
- There is no requirement to hold a risk margin within the financial statements.

Other comments

The technical provisions do not include an allowance for the matching adjustment, volatility adjustment (which would reduce the value of guaranteed liabilities) or any transitional measures (used by some companies to reduce the initial impact from moving to Solvency II).

Reinsurance

BBPM Life currently uses reinsurance in relation to the mortality risk exposures on its in-force business. In 2024 the risk was reinsured by RGA (2 reinsurers in 2023: RGA and Generali Italia S.p.A.). Taking account of the short duration of the business, the duration of the reinsurance contract and the low levels of mortality risk, reinsurance has not been allowed for within the actuarial models on the grounds of materiality.

D.2.2 Quantitative information on the valuation of assets

Technical Reserves Life

The value recorded in the MCBS of the technical reserves of Life corresponds to their *fair value* determined on the basis of the described methods.

Below are the values of the technical reserves Life divided into LoB (Line of Business).

The main difference is due to the minor reduction in the reserve due to the amount of new business written being in excess of the claims experienced.

Table D9 – Segmentation in LoB of reserves relative to Life business

	2024		2023		
	Insurance linked to index-linked and unit-linked	Total	Insurance linked to index-linked and unit-linked	Total	Difference
Technical reserves calculated as a single element	-	-	-	-	-
Gross Best Estimate	3,384,618	3,384,618	2,334,757	2,334,757	45%
Risk Margin	10,348	10,348	6,020	6,020	72%
Amounts recoverable from reinsurance			-	-	
Total	3,394,966	3,394,966	2,340,777	2,340,777	45%

The table below summarizes the differences found between the value measured in accordance with Solvency II and the evaluation for the purposes of the financial statements of the Company for the present value of future cashflows for insurance classified contract and the unit liability of investment classified contracts. (direct and indirect business gross of reinsurance).

Table D10 – Technical Reserves Life

	Solvency II	Financial statements	Difference
Technical Provisions – Index linked and unit linked	3,394,966	3,445,132	(50,166)
Total	3,394,966	3,445,132	(50,166)

D.2.3 Information on the volatility adjustment.

The Company does not apply the volatility adjustment.

D.3 Other Liabilities

D.3.1 Evaluation Criteria

Financial Liabilities

The fair value of other financial liabilities (non-technical) is determined by considering the merit of credit due to the time of issue (*at inception*) and not considering any subsequent changes in the merit of enterprise credit.

Other liabilities

For all other liabilities not included in the categories set out in the previous paragraphs, considering its characteristics, the entry value in the MCBS is consistent with the value of the same determined for the purposes of the Financial Statement prepared in accordance with the International Financial Reporting Standards (IFRS) and the Group's consolidated financial statements.

D.3.2 Quantitative information on the valuation of liabilities other than technical reserves

The following table shows the differences between other liabilities reported in the MCBS and the corresponding evaluations of the same in the balance sheet.

Table D11 - Other liabilities

	Solvency II	Financial statements	Difference
All other liabilities not reported elsewhere	1,777	50,143	48,366
Total	1,777	50,143	48,366

The differences recorded under "other liabilities (Any other liabilities, not elsewhere shown)" results from disparities between the quantification on the basis of the accounting standards and the identification and evaluation of the same under Solvency II in relation to the deferred income liability.

D.4 Alternative evaluation methods

No alternative methods of evaluation have been used for the Assets and Liabilities.

D.5 Other Information

Other relevant information on the assessment for the solvency position of the insurance may be found below.

E. Capital Management

E.1 Own funds

E.1.1 Scope

Own Funds (the "Own Funds" or "OF") represent the financial resources permanently acquired by the Company and available to absorb losses and to address the risks generated by the business.

The process of calculation of own funds eligible to cover the capital requirements (SCR and MCR) develops primarily in the determination of available own funds. These are then restated according to the eligibility criteria laid down in the Regulations, in order to get eligible own funds.

The Directive divides the Own Funds available in Basic Own Fund and Ancillary Own Fund.

The Basic Own Funds are constituted by the excess of assets over liabilities, both measured at fair value in accordance with art. 75 of the Directive. The constituent elements are classified into 3 levels (Tier 1, Tier 2, Tier 3) based on their technical characteristics with the aim of stability and absorption losses.

The reconciliation reserve, within Tier 1, is equal to the amount which is the total surplus of assets over liabilities, reduced by the value of:

- the own shares of the Company;
- expected dividends;
- Own Funds of Tier 2 and Tier 3;
- the elements of Tier 1 different from the reconciliation reserve itself;
- surplus of Own Funds on the notional SCR of Ring Fenced Funds.

The Company does not have any Ring-Fenced Fund.

Ancillary Own Funds (which the Company does not have as at 31 December 2024 are based on elements, which can be called up to absorb losses.

Included within this category are:

- share capital or initial fund unpaid and uncalled;
- letters of credit and guarantees;
- any other legally binding commitments received by the Company.

Such elements, whose inclusion is subject to approval by the supervisory authority, cannot be computed in the Tier 1 and are not eligible to cover the MCR.

The eligibility limits used are those established by art. 82 of the Regulations, which provides the following criteria to satisfy the solvency capital requirement (SCR):

- the proportion of Tier 1 must be at least equal to 50% of the SCR;
- the amount of the elements belonging to Tier 3 must be less than 15% of the SCR;
- the sum of the elements of Tier 2 and Tier 3 cannot be higher than 50% of the SCR.

To cover the minimum solvency capital requirement (MCR), art. 82 of the Regulation provides for more restrictive requirements. In particular the:

- share of Tier 1 capital must be at least equal to 80% of the MCR;
- amount of the elements belonging to the Tier 2 must be less than 20% of the MCR;

The elements of Tier 3 and Ancillary Own Funds are not allowed to cover the MCR.

Within the limits of the above, subordinated liabilities belonging to Tier 1 (defined as "Tier 1 restricted") may not exceed the limit of 20% of the total of the elements of Tier 1. The elements that should be included in higher Tier levels, but more than limits referred to above, they can be classified in the lower levels.

E.1.2 Capital management policy

The Company's capital management policy approved by the Board of Directors sets out the Company's aim to hold own funds to meet its capital requirement on an ongoing basis. The Capital planning process sets out the main needs of capital management, the sources of Capital management if required and the role and responsibilities in the capital management process for the three years of the planning period. There have been no material changes on over the reporting period.

Based on the evaluations carried out for Solvency purposes, the following tables represents the structure and the amounts of own funds to cover the SCR and the MCR determined for 2024.

E.1.3 Information on Company's Own Funds

Annual Movements of own funds of the Company

The table below summarises the situation of the basic and eligible own funds in the Company, according to the tier level, between the date of the 01 January 2024 and the situation at 31 December 2024.

Table E1 – Basic and Eligible Own Funds 2024

	2024 Opening position	Issues	Refunds	Adjustments for valuation movements	Adjustments for regulatory interventions	2024 Closing Position
Total own funds	103,263	-	-	33,776	-	137,039
Of which Tier 1 unrestricted	103,263	-	-	33,776	-	137,039
Total eligible own funds to cover the SCR	103,263	-	-	33,776	-	137,039
Of which Tier 1 unrestricted	103,263	-	-	33,776	-	137,039

The table below summarises the situation of the basic and eligible own funds in the Company, according to the tier level, between the date of the 01 January 2023 and the situation at 31 December 2023.

Table E2 – Basic and Eligible Own Funds 2023

	2023 Opening Position	Issues	Refunds	Adjustments for valuation movements	Adjustments for regulatory interventions	2023 Closing Position
Total own funds	95,540	-	-	7,723	-	103,263
Of which Tier 1 unrestricted	95,540	-	-	7,723	-	103,263
Total eligible own funds to cover the SCR	95,540	-	-	7,723	-	103,263
Of which Tier 1 unrestricted	95,540	-	-	7,723	-	103,263

The following table shows in detail the annual movement of the core capital of the Company during 2024 divided by type:

Table E3

	2024 Opening Position	Issues	Refunds	Adjustments for valuation movements	Adjustments for regulatory interventions	2024 Closing Position
Ordinary share capital paid	803	-	-	-	-	803
Reconciliation reserve	40,682	-	-	33,776	-	74,458
Other elements of own funds approved by the supervisory authority	61,778	-	-	-	-	61,778
Total "Tier 1 unrestricted"	103,263	-	-	33,776	-	137,039
Total own funds	103,263	-	-	33,776	-	137,039

The changes during the period are derived exclusively from adjustments to valuation movements. During 2024 no own funds were issued or refunded.

Composition and characteristics of the Company Own Funds

The following are the substantive conditions underlying the individual elements of the own funds of the Company.

The ordinary share capital corresponds to the amount paid by the shareholders of the Company which, in the right level of stability of the same and the capacity to absorb losses, qualify as equity-type "Tier 1 unrestricted".

The reconciliation reserve, based on the provisions of art. 69 of the Regulations, is the residual amount of own funds of the Company that qualifies as an element of own funds Type "Tier 1 unrestricted". The reconciliation reserve is determined by making some deductions to the amount of the difference between assets and liabilities resulting from MCBS. The table below shows the detail of the calculation of the reconciliation reserves.

Table E4 - Reconciliation Reserve

	2024 Tier 1 unrestricted	2023 Tier 1 unrestricted	Difference
Surplus of assets over liabilities (A)	137,039	103,263	33%
Own Shares (held directly and indirectly) (B)	0	0	
Dividends, distributions and predictable costs	0	0	
Other elements of core capital (D)	62,581	62,581	0%
Adjustments for items of their limited funds in relation to portfolios subject to separate fairness and equity adjustment (E)	0	0	
Reconciliation reserve (A-B-C-D-E)	74,458	40,682	83%

In 2024 the Company did not pay any dividend (2023: €10m).

As part of the entry that includes the other elements of the original own funds ("Other basic own fund items") are included the amount of the paid-up share capital and the share premium reserve classified as "Tier 1 unrestricted" (€m), and the amount of Other elements of own funds approved by the supervisory authority (€m).

Further valuation allowances of reconciliation reserves are the amount of:

- own shares held directly and indirectly by the Company;
- expected dividends;

Additional deductions, other than those disclosed in the reconciliation reserves calculation, to operate the core capital in the face of significant restrictions that affect the availability and transferability of own funds within the Company at the date were not identified.

Own funds eligible

The structures and the importance of the OF to cover the SCR and the MCR, determined for 2024 are shown in the following table:

Table E5 - Own funds available and eligible for coverage of the SCR

	2024			2023	
	Own funds available ("available")	Adjustments for eligibility	Own funds eligible ("eligible")	Own funds eligible ("eligible")	Difference
Tier 1 unrestricted	137,039		137,039	103,263	33%
Tier 1 restricted				-	
Tier 2				-	
Tier 3				-	
Total OF	137,039		137,039	103,263	33%
Total SCR	46,715		46,715	30,193	55%
Surplus / (deficit)	90,324		90,324	73,070	24%

Table E6 - Own funds available and eligible for coverage of the MCR

	2024			2023	
	Own funds available ("available")	Adjustments for eligibility	Own funds eligible ("eligible")	Own funds eligible ("eligible")	Difference
Tier 1 unrestricted	137,039		137,039	103,263	33%
Tier 1 restricted				-	
Tier 2				-	
Total OF	137,039		137,039	103,263	33%
Total MCR	21,022		21,022	13,587	55%
Surplus / (deficit)	116,017		116,017	89,676	29%

Reconciliation with the equity from financial statements

The MCBS as of 31 December 2024 closed with a surplus of assets over liabilities, amounting to €49m compared to shareholders' equity in the financial statements of the Company on that date (the "Financial Statements"). This difference is due to the different evaluation of the equity components, as evidenced by the following statement of reconciliation:

Table E7 – Reconciliation of equity -financial statements and MCBS

A	Equity from financial statements	88,266
	Adjustments for type assets or liabilities	
1	Deferred acquisition cost	(42,791)
2	Deferred income liability	48,366
3	Other financial investments	
4	Reinsurance Reserves Non-Life	
5	Non-Life Reserves	
6	Life Reserves	50,166
7	Reinsurance Reserves Life	
8	Financial liabilities	
9	Other activities	
10	Provisions	
11	Other liabilities	
12	Deferred taxes	(6,968)
	Total adjustments	48,773
B	Equity from MCBS	137,039

Section D sets out the evaluation criteria adopted for the purposes of preparing the MCBS, as well as quantitative information of greater detail about the comparison with the balance of values.

E.2 Solvency Capital Requirement and the Minimum Capital Requirement

The amount of the Company's SCR and MCR at the end of the reporting period are €46,715 and €21,022 respectively (2023: €30,193 and €13,587 respectively). The increase in SCR is largely driven by the increase in VIF of the Company due to the increase in new business and therefore assets under management.

Table E8 - SCR - Standard Formula

Risk Modules	2024	2023	Difference
Technical Risks Insurance Life	30,943	19,095	62%
Market Risks	29,107	17,238	69%
Credit Risk	2,784	3,400	(18%)
Benefit of diversification	(14,395)	(9,738)	(48%)
BSCR	48,439	29,995	61%
Operational Risk	4,949	3,823	29%
ALAC TP	0	0	0%
ALAC DT	(6,673)	(3,624)	(84%)
SCR - Standard Formula	46,715	30,193	55%

The most material change in the SCR is related to the sub module *Life Risk* and as confirmed previously it is primarily related to the following:

- an increase to the lapse risk due to an increase in the value-in-force (VIF) of the Company which when stressed increases the mass lapse risk.

The MCR is calculated according to article 248 of the of the Commission Delegated Regulation (EU) 2015/35 and it is equal to % of the SCR.

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

The company is not using the sub module on the equity risk sub art. 304 for the calculation of the SCR.

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

The company calculates its Solvency Capital Requirement by Standard Formula only.

E.5 Non-compliance with the minimum capital requirements and non-compliance with the Solvency Capital Requirement

During the year, there were no periods in which the Company has not covered its Solvency Capital Requirement, or its minimum capital.

E. 6 Other information

There has been no additional material information on the company's capital management.

Attachments

Balance Sheet (S.02.01.02)

Premiums, claims and expenses by country (S.04.05.21)

Premiums, claims and expenses by country (S.05.02.01)

Life and Health STL Technical Reserves (S.12.01.02)

Own funds (S.23.01.01)

SCR - Undertakings for using the formula (S.25.01.21 standard)

MCR - Only life or only non-life insurance or reinsurance activity (S.28.01.01)

Annex I
S.02.01.02
Balance sheet

Assets

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

	Solvency II value
	C0010
R0030	
R0040	
R0050	
R0060	2,340
R0070	72,702
R0080	
R0090	
R0100	
R0110	
R0120	
R0130	72,702
R0140	72,702
R0150	
R0160	
R0170	
R0180	
R0190	
R0200	
R0210	
R0220	3,429,462
R0230	
R0240	
R0250	
R0260	
R0270	
R0280	
R0290	
R0300	
R0310	
R0320	
R0330	
R0340	
R0350	
R0360	50,778
R0370	
R0380	672
R0390	
R0400	
R0410	22,639
R0420	1,437
R0500	3,580,030

Annex I
S.02.01.02
Balance sheet

Liabilities

Technical provisions – non-life
Technical provisions – non-life (excluding health)
TP calculated as a whole
Best Estimate
Risk margin
Technical provisions - health (similar to non-life)
TP calculated as a whole
Best Estimate
Risk margin
Technical provisions - life (excluding index-linked and unit-linked)
Technical provisions - health (similar to life)
TP calculated as a whole
Best Estimate
Risk margin
Technical provisions – life (excluding health and index-linked and unit-linked)
TP calculated as a whole
Best Estimate
Risk margin
Technical provisions – index-linked and unit-linked
TP calculated as a whole
Best Estimate
Risk margin
Contingent liabilities
Provisions other than technical provisions
Pension benefit obligations
Deposits from reinsurers
Deferred tax liabilities
Derivatives
Debts owed to credit institutions
Financial liabilities other than debts owed to credit institutions
Insurance & intermediaries payables
Reinsurance payables
Payables (trade, not insurance)
Subordinated liabilities
Subordinated liabilities not in BOF
Subordinated liabilities in BOF
Any other liabilities, not elsewhere shown
Total liabilities
Excess of assets over liabilities

	Solvency II value
	C0010
R0510	
R0520	
R0530	
R0540	
R0550	
R0560	
R0570	
R0580	
R0590	
R0600	
R0610	
R0620	
R0630	
R0640	
R0650	
R0660	
R0670	
R0680	
R0690	3,394,966
R0700	
R0710	3,384,618
R0720	10,348
R0740	
R0750	
R0760	
R0770	
R0780	7,006
R0790	
R0800	
R0810	2,407
R0820	33,002
R0830	113
R0840	3,720
R0850	
R0860	
R0870	
R0880	1,777
R0900	3,442,991
R1000	137,039

Annex I
Premiums, claims and expenses by country
S.04.05.21

Home country: Life insurance and reinsurance obligations							
		Home Country	Top 5 countries: life				
			C0031	C0032	C0033	C0034	C0035
			IT				
		C0030	C0040	C0041	C0042	C0043	C0044
Gross Written Premium	R1020		1,147,985				
Gross Earned Premium	R1030		1,147,985				
Claims incurred	R1040		216,551				
Gross Expenses Incurred	R1050	11,275	41,827				

Annex I
Premium, claims
and expenses by
line of business
S.05.01.02.02

Line of Business for: life insurance obligations						Life reinsurance obligations		Total
Health insurance	Insurance with profit participation	Index-linked and unit-linked insurance	Other life insurance	Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations	Health reinsurance	Life reinsurance	
C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0300
Premiums written								
Gross	0	0	1,147,985	0	0	0	0	1,147,985
Reinsurers' share	0	0	186	0	0	0	0	186
Net	0	0	1,147,799	0	0	0	0	1,147,799
Premiums earned								
Gross	0	0	1,147,985	0	0	0	0	1,147,985
Reinsurers' share	0	0	186	0	0	0	0	186
Net	0	0	1,147,799	0	0	0	0	1,147,799
Claims incurred								
Gross	0	0	216,551	0	0	0	0	216,551
Reinsurers' share	0	0	89	0	0	0	0	89
Net	0	0	216,462	0	0	0	0	216,462
Expenses incurred	0	0	53,102	0	0	0	0	53,096
Balance - other technical expenses/income								
Total expenses								53,096
Total amount of surrenders	0	0	158,158	0	0	0	0	158,158

Annex I
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)	Health insurance (direct business)			Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Health reinsurance (reinsurance accepted)	Total (Health similar to life insurance)
			Contracts without options and guarantees	Contracts with options or guarantees		Contracts without options and guarantees	Contracts with options or guarantees					Contracts without options and guarantees	Contracts with options or guarantees			
	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0150	C0160	C0170	C0180	C0190	C0200	C0210
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 as a whole	R0020															
Technical provisions calculated as a sum of BE and RM																
Best Estimate																
Gross Best Estimate	R0030		3,384,618							3,384,618						
Best estimate minus recoverables from reinsurance/SPV and Finite Re - total	R0090		3,384,618							3,384,618						
Risk Margin	R0100	10,348								10,348						
Amount of the transitional on Technical Provisions																
Technical Provisions calculated as a whole	R0110															
Best estimate	R0120															
Risk margin	R0130															
Technical provisions - total	R0200	3,394,966								3,394,966						

Annex I
S.23.01.01
Own funds

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

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

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

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

	Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
	C0010	C0020	C0030	C0040	C0050
R0010	803	803			
R0030					
R0040					
R0050					
R0070					
R0090					
R0110					
R0130	74,458	74,458			
R0140					
R0160					
R0180	61,778	61,778			
R0220					



Deductions

Deductions for participations in financial and credit institutions

Total basic own funds after deductions

Ancillary own funds

Unpaid and uncalled ordinary share capital callable on demand

Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand

Unpaid and uncalled preference shares callable on demand

A legally binding commitment to subscribe and pay for subordinated liabilities on demand

Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC

Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC

Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC

Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC

Other ancillary own funds

Total ancillary own funds

Available and eligible own funds

Total available own funds to meet the SCR

Total available own funds to meet the MCR

Total eligible own funds to meet the SCR

Total eligible own funds to meet the MCR

SCR

MCR

Ratio of Eligible own funds to SCR

Ratio of Eligible own funds to MCR

R0230					
R0290	137,039	137,039			
R0300					
R0310					
R0320					
R0330					
R0340					
R0350					
R0360					
R0370					
R0390					
R0400					
R0500	137,039	137,039			
R0510	137,039	137,039			
R0540	137,039	137,039			
R0550	137,039	137,039			
R0580	46,715				
R0600	21,022				
R0620	293%				
R0640	652%				



Reconciliation reserve

Excess of assets over liabilities

Own shares (held directly and indirectly)

Foreseeable dividends, distributions and charges

Other basic own fund items

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

Reconciliation reserve

Expected profits

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

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

Total Expected profits included in future premiums (EPIFP)

R0700	137,039	
R0710		
R0720		
R0730	62,581	
R0740		
R0760	74,458	
R0770		
R0780		
R0790		

Annex I

S.25.01.21

Solvency Capital Requirement - for undertakings on Standard Formula

	Gross solvency capital requirement	USP	Simplifications
	C0110	C0090	C0120
Market risk	R0010 29,107	-	-
Counterparty default risk	R0020 2,784	-	-
Life underwriting risk	R0030 30,943	-	-
Health underwriting risk	R0040	-	-
Non-life underwriting risk	R0050	-	-
Diversification	R0060 -14,395	-	-
Intangible asset risk	R0070	-	-
Basic Solvency Capital Requirement	R0100 48,439	-	-

Calculation of Solvency Capital Requirement

Operational risk	R0130 4,949
Loss-absorbing capacity of technical provisions	R0140
Loss-absorbing capacity of deferred taxes	R0150 -6,674
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160
Solvency capital requirement excluding capital add-on	R0200 46,715
Capital add-on already set	R0210
Solvency capital requirement	R0220 46,715
Other information on SCR	
Capital requirement for duration-based equity risk sub-module	R0400
Total amount of Notional Solvency Capital Requirement for remaining part	R0410
Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420
Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios	R0430
Diversification effects due to RFF nSCR aggregation for article 304	R0440



Approach to tax rate		Yes/No
		C0109
Approach based on average tax rate	R0590	2 - No
Calculation of loss absorbing capacity of deferred taxes		LAC DT
		C0130
LAC DT	R0640	-6,674
LAC DT justified by reversion of deferred tax liabilities	R0650	-6,674
LAC DT justified by reference to probable future taxable economic profit	R0660	
LAC DT justified by carry back, current year	R0670	
LAC DT justified by carry back, future years	R0680	
Maximum LAC DT	R0690	

Annex I

S.28.01.01

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

Linear formula component for non-life insurance and reinsurance obligations

MCR _{NL} Result	R0010	C0010	Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
			C0020	C0030
Medical expense insurance and proportional reinsurance	R0020			
Income protection insurance and proportional reinsurance	R0030			
Workers' compensation insurance and proportional reinsurance	R0040			
Motor vehicle liability insurance and proportional reinsurance	R0050			
Other motor insurance and proportional reinsurance	R0060			
Marine, aviation and transport insurance and proportional reinsurance	R0070			
Fire and other damage to property insurance and proportional reinsurance	R0080			
General liability insurance and proportional reinsurance	R0090			
Credit and suretyship insurance and proportional reinsurance	R0100			
Legal expenses insurance and proportional reinsurance	R0110			
Assistance and proportional reinsurance	R0120			
Miscellaneous financial loss insurance and proportional reinsurance	R0130			
Non-proportional health reinsurance	R0140			
Non-proportional casualty reinsurance	R0150			
Non-proportional marine, aviation and transport reinsurance	R0160			
Non-proportional property reinsurance	R0170			

Linear formula component for life insurance and reinsurance obligations

MCR _L Result	R0200	C0040	Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
			C0050	C0060
Obligations with profit participation - guaranteed benefits	R0210			
Obligations with profit participation - future discretionary benefits	R0220			
Index-linked and unit-linked insurance obligations	R0230	3,384,618		
Other life (re)insurance and health (re)insurance obligations	R0240			
Total capital at risk for all life (re)insurance obligations	R0250			200,422



Overall MCR calculation

		C0070		
Linear MCR	R0300	23,833		
SCR	R0310	46,715	-	-
MCR cap	R0320	21,022		
MCR floor	R0330	11,679		
Combined MCR	R0340	21,022		
Absolute floor of the MCR	R0350	4,000		
-	-	C0070		
Minimum Capital Requirement	R0400	21,022		