# IPB Insurance CLG Trading as IPB Insurance

Solvency and Financial Condition Report (SFCR)

For the Financial Year Ended 31 December 2017

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### Introduction / Summary

IPB Insurance CLG (hereinafter referred to as "the company") has prepared this Solvency Financial Condition Report (hereafter SFCR) to satisfy the public disclosure requirements under the Commission Delegated Regulation (EU) 2015/35 of the European Parliament supplementing Directive 2009/138/EC, known as Solvency II, which came into effect from 1 January 2016. This SFCR covers the business and performance of the company, its system of governance, risk profile, valuation for solvency purposes and capital management. The ultimate responsibility for all of these matters lies with the company's Board of Directors, with support from various governance and control functions that have been put in place to monitor and manage the operations of the business. This SFCR went through both an internal and external review and approval process, including Board approval as per the *EIOPA Guideline 37* and was subject to controls to ensure that the information contained herein is reliable, complete and consistent with information and other reports submitted to the Central Bank.

The company is a mutual non-life Insurance company established in 1926 and regulated by the Central Bank of Ireland. The principal activity of the company continues to be the provision of insurance and risk management support to its Members and customers, both in the public and private sector, with most of its underwriting risk concentrated in the Republic of Ireland. The company is 100% Irish owned and is a Standard & Poor's A- stable rated insurer with excellent financial strength.

The company delivered a solid performance for the year resulting in a profit before tax of €42.3 million. This growth was primarily due to better than expected investment returns and a year-on-year improvement in our underwriting result.

The company delivered an underwriting surplus of €2.7 million (loss 2016: -€3.9 million), making an improvement of €6.6 million on the previous year but slightly short of target. Gross written premium for the year grew to €141.1 million, a 13% increase on 2016 GWP of €124.9 million. This growth was driven primarily by a combination of risk transfers as Members move to ground-up cover and rate increases. Ireland's insurance sector continues to see improvement in financial results as corrective rating and underwriting action in recent years is finally returning the industry to underwriting profitability. Claims costs related to personal injuries remain high by European standards although there are encouraging signs that the industry may have reached a peak in claims frequency, however, high claims costs remain a challenge. For the company the impact of internal claims management improvements and the signs of a moderating claims environment are encouraging.

The company delivered an investment return of 3.2% or €39.6 million which is a remarkable achievement when compared to 1.9% or €23.1 million for the prior year and exceeds the weighted average benchmarks of 1.4% by almost 2%. Equity Market profits were a key feature of 2017 and the major component of the investment return.

The company has in place a comprehensive set of terms of reference, policies and procedures supporting all aspects of its governance and control framework and is appropriate to its nature, size and complexity. The Board of Directors delegates authority to its Sub-Committees to complete separate programmes of work on its behalf whilst ensuring regular reporting with clear terms of reference. The company has also established the four key independent control functions required under the Corporate Governance Requirements for Insurance Undertakings 2015 and in accordance with Articles 44, 46, 47 and 48 of the Solvency II Directive – Risk Management, Compliance, Actuarial and Internal Audit. These functions are responsible for providing oversight of and challenge to the business and for providing assurance to the Board of Directors in relation to the company's control framework. Each of the independent functions

have direct reporting lines to the Board of Directors, as well as the relevant Board of Directors Committees.

The Risk Profile of the company is stable and is currently dominated by Underwriting and Market Risk. The company has complied with the Solvency II directive on an on-going basis throughout the year and the capital available to the company is of a very high quality, consisting wholly of retained earnings. The assets that comprise the available capital are invested in a very balanced investment portfolio with limited risk accepted within the parameters of the Board Approved Risk Appetite Statement.

As at 31 December 2017, the company's eligible own funds to cover the SCR and MCR stood at €744.9 million (2016: €808.2 million), which represented a solvency ratio of 3.4 times the SCR (2016: 3.9 times). The company's SCR and MCR were €216.4 million and €54.1 million respectively (2016: €207.2 million and €51.8 million respectively). There was no breach of the Solvency Capital Requirement (and hence the Minimum Capital Requirement) over the reporting period.

#### A: Business and Performance

#### A.1 Business

The company is a mutual non-life insurance company established in Ireland in 1926 and limited by guarantee. The company is a single entity and does not form part of a group. It is governed by the "Constitution of IPB Insurance CLG" and the Local Authorities (Mutual Assurance) Acts of 1926, 1928 and 1935 together with corporate and regulatory legislation. The principal activity of the company continues to be the provision of insurance and risk management support to its Members and customers, both in the public and private sector, with most of its underwriting risk concentrated in the Republic of Ireland. Membership consists predominantly of Local Authorities, Education and Training Board ("ETBs") and the Health Service Executive ("HSE"). The company is 100% Irish owned and is a Standard & Poor's A- stable rated insurer with excellent financial strength. It is not leveraged and it maintains large capital buffers accumulated from retained earnings. The company's current organisational structure is set out on page 11.

The company's registered office and operating address is: 1 Grand Canal Square, Grand Canal Harbour, Dublin 2 D02 P820.

The Central Bank of Ireland ("Central Bank") is responsible for the financial supervision of the company. The Central Bank's address is: Central Bank of Ireland, New Wapping Street, North Wall Quay, Dublin 1.

The company's external auditor is: Deloitte, Chartered Accountants and Statutory Audit Firm, Deloitte and Touche House, Earlsfort Terrace, Dublin 2.

The company's financial year end is 31 December each year and it reports its results in EUR (Euro).

There have been no significant business or external events during the year.

#### A.2 Underwriting Performance

The company delivered an underwriting surplus of €2.7 million (2016: -€3.9 million), making an improvement of €6.6 million on the previous year but slightly short of target. The company's underwriting performance continues to be impacted by increasing claim frequency and costs. In response to its poor underwriting result over the past number of years, the company had to introduce rate increases in recent years consistent with the experience of the wider insurance industry where corrective rating action has been the subject of considerable comment in both Dáil Éireann and the media. The prevailing adverse claims environment necessitated an average rate increase of 6% across the company's portfolio of Member business in 2017.

As the stakeholders of the business it is important that Members are protected by having a mutual insurer that delivers a positive underwriting result on a consistent basis. The prudent pricing of Member and non-Member business has delivered a modest underwriting performance this year. Gross written premiums (GWP) for the year grew to €141.1 million, up 13% or €16.2 million on the previous year (2016: €124.9 million). The largest contributor to this GWP growth was general liability insurance, generating a total of €97.2 million during the year (2016: €83.9 million). GWP growth was primarily driven by a combination of risk transfer as Members move to ground-up cover and rate increases.

Claims incurred net of reinsurance amounted to €95 million (2016: €88.8 million). The claims environment continues to be a challenge though there is some evidence that it is beginning to stabilise. Some of the drivers of the continued high cost of claims for the industry include; increased involvement of solicitors in Injuries Board claims, the high rejection rate of Injuries Board awards in favour of pursuing court awards, rising costs of professional legal and expert fees, impact of increasing the court jurisdiction of the Circuit Court, the continuing impact of the reduction in the discount rate for the cost of future care and loss of earnings. On a positive note, the level of awards in the High Court appears to be stabilising following some recent examples of Court of Appeal decisions to reduce awards by almost 50%. In addition, the provision of guidelines to judges on the assessment of damages appears to be bringing greater consistency to court awards.

Commission income delivered a result of €8.7 million for the year, up €2.1 million from the prior year (2016: €6.6 million). Commission income is earned on reinsurance contracts entered with a panel of global reinsurers.

The following tables shows an analysis of the underwriting result by product and by location, compared to the prior year, as per the year-end financial statements:

Analysis of underwriting result by product		Fire and other			
	Third party	damage to			
	liability	property	Motor	Other	Total
2017	€'000	€′000	€′000	€′000	€′000
Gross written premiums	97,177	26,339	9,247	8,332	141,095
Premium ceded to reinsurers	(6,066)	(15,998)	(622)	(244)	(22,930)
Change in the gross provision for unearned premiums	(503)	(2,657)	(185)	(126)	(3,471)
Net earned premiums	90,608	7,684	8,440	7,962	114,694
Gross claims paid	(62,503)	(1,879)	(5,732)	(1,541)	(71,655)
Claims recovered from reinsurers	1,808	(2,311)	1,408	-	905
Gross change in contract liabilities	(10,315)	(330)	1,613	(1,358)	(10,390)
Change in contract liabilities recovered from reinsurers	(10,100)	(1,757)	(1,972)	-	(13,829)
Net claims incurred	(81,110)	(6,277)	(4,683)	(2,899)	(94,969)
Technical underwriting result - net	9,498	1,407	3,757	5,063	19,725
Commission income	371	7,929	42	326	8,668
Operating expenses	(16,475)	(4,465)	(1,568)	(1,413)	(23,921)
Underwriting expenses	(1,040)	(557)	(57)	(136)	(1,790)
Underwriting result	(7,646)	4,314	2,174	3,840	2,682
Net investment return	27,297	7,399	2,598	2,340	39,634
Othercosts	-	-	-	-	-
Profit before taxation	19,651	11,713	4,772	6,180	42,316
Net insurance liabilities	441,911	12,273	23,868	14,829	492,881
Analysis of underwriting result by product	,	Fire and other			
	Third party	damage to			
	liability	property	Motor	Other	Total
2016	€′000	€′000	€′000	€′000	€′000
Gross written premiums	83,863	25,115	7,738	8,156	124,872
Premium ceded to reinsurers	(5,518)	(14,766)	(574)	(308)	(21,166)
Change in the gross provision for unearned premiums	(5,844)	1,942	(365)	438	(3,829)
Net earned premiums	72,501	12,291	6,799	8,286	99,877
Gross claims paid	(59,399)	(8,924)	(8,345)	(1,652)	(78,320)
Claims recovered from reinsurers	5,843	5,298	3,276	-	14,417
Gross change in contract liabilities	(14,929)	3,367	(2,758)	54	(14,266)
Change in contract liabilities recovered from reinsurers	(5,454)	(1,223)	(3,960)	(21)	(10,658)
Net claims incurred	(73,939)	(1,482)	(11,787)	(1,619)	(88,827)
Technical underwriting result - net	(1,438)	10,809	(4,988)	6,667	11,050
Commission income	350	5,858	38	330	6,576
Operating expenses	/12 AEE\	(4,030)	(1,242)	(1,309)	(20,036)
	(13,455)	( -,,		( /	
Underwriting expenses	(848)	(507)	(51)	(132)	
Underwriting expenses Underwriting result			(51) (6,243)		
	(848)	(507)		(132)	
Underwriting result	(848) (15,391)	(507) <b>12,130</b>	(6,243)	(132) <b>5,556</b>	(1,538) (3,948) 23,118 (1,000)
Underwriting result  Net investment retum	(848) (15,391) 15,525	(507) 12,130 4,650	( <b>6,243</b> ) 1,433	(132) <b>5,556</b> 1,510	(3,948) 23,118

Analysis of underwriting result by location	2017				2016	
	Re public of Ireland €'000	Northern Ireland €'000	Total €'000	Republic of Ireland €'000	Northern Ireland €'000	Total €'000
Gross written premiums	139,272	1,823	141,095	122,741	2.131	124,872
Premium ceded to reinsurers	(22,813)	(117)	(22,930)	(20,962)	(204)	(21,166)
Change in the gross provision for une arned premiums	(3,546)	75	(3,471)	(4,198)	369	(3,829)
Net earned premiums	112,913	1,781	114,694	97,581	2,296	99,877
Gross daims paid	(70,937)	(718)	(71,655)	(77,912)	(408)	(78,320)
Claims recovered from reinsurers	819	86	905	14,347	70	14,417
Gross change in contract liabilities	(9,871)	(519)	(10,390)	(11,460)	(2,806)	(14,266)
Change in contract liabilities recovered from reinsurers	(13,601)	(228)	(13,829)	(12,583)	1,925	(10,658)
Net daims incurred	(93,590)	(1,379)	(94,969)	(87,608)	(1,219)	(88,827)
Te chnical underwriting result - net	19,323	402	19,725	9,973	1,077	11,050
Commission income	8,653	15	8,668	6,537	39	6,576
Operating expenses	(23,612)	(309)	(23,921)	(19,694)	(342)	(20,036)
Underwriting expenses	(1,784)	(6)	(1,790)	(1,529)	(9)	(1,538)
Underwriting result	2,580	102	2,682	(4,713)	765	(3,948)
Net investment return	39,122	512	39,634	22,723	395	23,118
Other costs	-	-	-	(983)	(17)	(1,000)
Profit before taxation	41,702	614	42,316	17,027	1,143	18,170
Net insurance liabilities	488,639	4,242	492,881	461,621	3,569	465,190

<u>Appendix 1</u> and <u>Appendix 2</u> provide further detail on the underwriting performance as per the year end *S.05 Premium, Claims and Expenses* Templates and the *S.19.01.21 Non-Life Insurance Claims* Template.

The key drivers of the changes in the *S.05 Premium, Claims and Expenses* Template have been discussed above. The reduction in claims payments in 2017 compared with 2016 In the *S.19.01.21 Non-Life Insurance Claims* Template can be mostly attributed to a large one-off recovery on the property book. The increase in the Best Estimate Claims Provisions is largely due to the new ground-up covers along with a reduction in historical retro balances.

#### A.3 Investment Performance

The company delivered an investment return of 3.2% or €39.6 million which is a remarkable achievement when compared to 1.9% or €23.1 million for the prior year and exceeds the weighted average benchmarks of 1.4% by almost 2%. As a function of the Quantitative Easing (QE) programme operated by the European Central Bank, shorter-dated bond yields and cash rates remained negative but have troughed and are expected to rise over the next 12 months. This has both a positive and negative impact on the portfolio valuation as higher rates will result in higher reinvestment returns but these returns are offset by a decline in the value of existing bond holdings. Equity Market profits were a key feature of 2017 and the major component of the investment return.

The following table shows an analysis of the investment return, compared to the prior year, as per the financial statements.

Analysis of net investment return	Investme nt	Net realised gains/	Net unrealised gains/	FX gains/	Investment	Total investment
	income	(losses)	(losses)	(losses)	expenses	return
2017	€'000	€′000	€′000	€'000	€′000	€'000
Investment properties	5,291	-	(191)	-	-	5,100
At fair value through profit or loss						
- Debt securities	13,583	(1,278)	(6,826)	(3,274)	-	2,205
- Equity securities	5,150	14,121	12,672	(2,684)	-	29,259
Loans and receivables						
- Loans to local authorities	112	-	-	-	-	112
- Deposits with credit institutions	17	-	-	-	-	17
Cash and cash equivalents	(357)	-	-	(149)	-	(506)
Derivatives	-	-	-	4,298	-	4,298
FX gain/(loss) on insurance business	-	-	-	(162)	-	(162)
Investment expenses	-	-	-	-	(689)	(689)
Total net investment return	23,796	12,843	5,655	(1,971)	(689)	39,634

Analysis of net investment return		Net	Net			
		realised	unrealised	FX		Total
	In vest ment	gains/	gains/	gains/	Investment	in vest ment
	income	(losses)	(losses)	(losses)	expenses	return
2016	€'000	€′000	€′000	€'000	€′000	€'000
Investment properties	4,343	-	558	-	-	4,901
At fair value through profit or loss						
- Debt securities	14,594	(356)	3,444	813	-	18,495
- Equity securities	5,146	15,859	(19,334)	(4,790)	-	(3,119)
Loans and receivables						
- Loans to local authorities	134	-	-	-	-	134
- Deposits with credit institutions	585	-	-	-	-	585
Cash and cash equivalents	(220)	-	-	(274)	-	(494)
Derivatives	-	-	-	3,777	-	3,777
FX gain/(loss) on insurance business	-	-	-	(267)	-	(267)
Investment expenses	-	-	-	-	(894)	(894)
Total net investment return	24,582	15,503	(15,332)	(741)	(894)	23,118

The company has no gains / losses recognised directly in equity because all gains and losses are recognised through the Statement of Comprehensive Income as opposed through the Statement of Changes in Equity. The company does not engage in any securitisation.

Company assets are invested in highly rated investments in accordance with the "prudent person principle". Investment decisions are made in the best interests of policyholders and other stakeholders. The fundamental objective is that all valid claims and expenses are paid as they fall due. In practice assets

are allocated into two notional portfolios which have different objectives – The Matched Portfolio and The Risk Portfolio. These objectives are discussed in more detail later in this Report.

#### A.4 Performance of other Activities

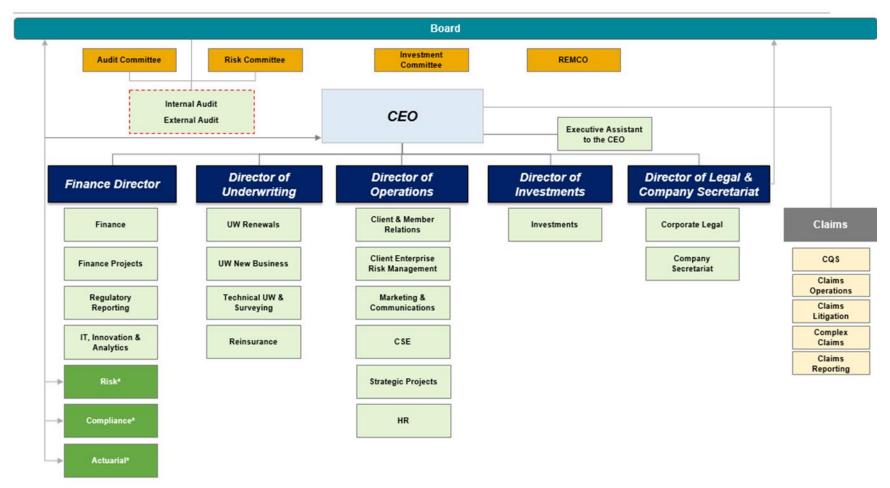
Operating expenses were up compared to the prior year. Total operating expenses amounted to €23.9 million for the year (2016: €20 million). The largest component of operating expenses related to staff costs and the increase in operating expenses was primarily driven by an increase in staff numbers.

#### A.5 Any other Information

During 2017, the company paid a dividend to its Members of €15 million (2016: €15 million) and paid an initial €20.9m of a retained earnings distribution of €200m which is to be paid to Members over a 5-year period. This underlines the company's commitment to its Members. The Members' dividend is payable to current Members in proportion to the gross premium income derived from them in the most recent financial year. The retained earnings distribution is payable to Members in proportion to the average gross premium income derived from them during the 5-year period 2011-2015.

## B: System of Governance

### IPB Insurance CLG – Organisational Structure



<sup>\*</sup> Risk, Compliance and Actuarial have direct reporting to CEO, Board, Audit & Risk Committee

<sup>\*\*</sup> Internal & External Audit have direct reporting to the Board and Audit Committee – also have a relationship with Risk, Compliance and Finance



# B.1 General Information on the System of Governance Role of the Board of Directors

The key role of the Board of Directors involves leadership and oversight of the Chief Executive Officer's effective implementation of the business's strategy. The Chairman, George Jones, is responsible for leading the Board of Directors and ensuring the full participation of each director. Constructive challenge by the Board of Directors to management is critical in providing assurance to the company's stakeholders that the business and its management team achieve appropriate governance standards while meeting the goals and objectives of the business.

#### **Board of Directors Composition**

The composition of the Board of Directors is consistent with regulatory requirements and responsive to the evolution of the company's business activities. The Board of Directors, following Central Bank consultation on its optimum composition, comprises of four group non-executive Directors (GNED) (George Jones, Michael McGreal, Michael Fitzgerald and Sean O'Grady), three Independent Non-Executive Directors (INED) (Caitriona Somers, Dermot Gorman and John Smyth) and two Executive Directors, the Chief Executive Officer (CEO), Michael Garvey and the Finance Director, Enda Devine. In June of last year, Independent Non-Executive Director Gary Cullen retired from the Board and Caitriona Somers joined the Board in July of last year. There is a clear division of responsibilities between the Chairman and the CEO and the Board of Directors has the strength and balance to ensure that all aspects of the business are addressed. The skills of the INEDs assist with the development of the business while the GNEDs ensure maintenance of the experience and continuity of the company's strong legacy. The Executive Directors

have a significant amount of technical, financial and insurance experience and they are tasked with delivering on the strategic objectives of the company and in doing so, oversee the day to day operations of the company. Each member of the Board participates in a comprehensive training and development programme to ensure continuous skills enhancement.

#### **Board Committees**

The company has in place a comprehensive set of terms of reference, policies and procedures supporting all aspects of its governance and control framework and is appropriate to its nature, size and complexity, the Board of Directors delegates authority to the following Board Committees to complete separate programmes of work on its behalf whilst ensuring regular reporting with a clear terms of reference:

- A Risk Committee, the role of which is to establish, document and devolve throughout the
  company a comprehensive risk management framework. The Risk Committee assists the Board
  with its oversight of risk and risk management. It meets at least four times per year and follows a
  structured approach that covers all key risk types within the business, including emerging and
  strategic risks. The Risk Committee is advised by subject matter experts on risk management,
  underwriting, claims, investments and compliance.
- An Audit Committee, the main role of which includes responsibility for maintaining oversight of
  the company's financial reporting, internal controls, audit processes and processes for monitoring
  legal and regulatory compliance. The Audit Committee also reviews the escalation process for
  employees in accordance with the Whistleblowing Policy outlined in the company's Ethics Policy.
- An Investment Committee with responsibility for ensuring discharge by the Board of Directors'
  of its oversight responsibilities in respect of the conduct of the company's investment
  management operations within approved investment policy and risk parameters. The Investment
  Committee also monitors the compliance of the company's investment activities with legislative
  provisions and regulatory requirements.
- A Remuneration and Nomination Committee with responsibility for recommending succession
  planning for the Board and Management for Board approval. This includes overseeing the fitness
  and probity process associated with the appointment or removal of Board members and any head
  of control function by conducting an annual review of their compliance with requisite standards.
  The Remuneration and Nomination Committee is also responsible for Board recommendation of
  the company's Remuneration Policy, non-executive Director fee structures, and the remuneration
  of Executive Directors and individuals remunerated per criteria specified in its Terms of Reference.
- A Corporate Social Engagement (CSE) Steering Committee with responsibility for keeping under review and making appropriate recommendations to the Board of Directors with regards to the company's management of CSE activity.

#### **Independent Control Functions**

The company has also established the four key independent control functions required under the Corporate Governance Requirements for Insurance Undertakings 2015 and in accordance with Articles 44, 46, 47 and 48 of the Solvency II Directive – Risk Management, Compliance, Actuarial and Internal Audit. These functions are responsible for providing oversight of and challenge to the business and for providing assurance to the Board of Directors in relation to the company's control framework. Each of the independent functions have direct reporting lines to the Board of Directors, as well as the relevant Board of Directors Committees. These functions are discussed in more detail later in this report.

#### Remuneration, Employee Benefits and Practices

The company's Remuneration Policy is underpinned by a philosophy providing employees with appropriate remuneration and incentives to encourage high performance and to ensure that they are, in

a fair and responsible manner, rewarded for their individual contributions which are aligned to the success of the Company while also ensuring that the principles of sound, prudent risk management are fully reflected and that excessive risk taking is neither encouraged nor rewarded, with respect to the business as a whole having regard to IPBs mutual status and value creation for IPBs stakeholders.

Our philosophy has the objective of retaining, developing, motivating and attracting high-performing employees and fairly and responsibly rewarding individual contributions to IPB's success per the risk strategy and appetite, whilst ensuring that excessive risk taking is discouraged and remuneration practices are aligned with IPB's strategic direction, strategy and stakeholders' interests and consistent with a reasonable assessment of its financial situation and prospects.

The key principles underpinning IPB's Remuneration Policy are:

- To reflect IPB's commitment to compliance with applicable legal and regulatory requirements, including but not limited to the Corporate Governance Requirements for Insurance Undertakings 2015 (the Requirements), the Central Bank of Ireland's Guidelines on Variable Remuneration Arrangements for Sales Staff issued in 2014, the EIOPA Guidelines on the System of Governance and the Solvency II Delegated Regulation (EU) 2015/35.
- To create an integrated IPB Remuneration and Benefits Framework that is consistent with IPB's remuneration philosophy and delivers appropriate remuneration packages, based on annual reviews and approvals by the Committee and the Board of remuneration per risk appetite and effected by the appropriate governance in line with IPB's approval processes and ensures internal equity and market competitiveness through periodic participation in external market reviews and benchmarking exercises with support from suitably qualified and independent external advisors as identified by and appointed by the Committee and the Board.
- To support IPB in retaining, developing, motivating and attracting appropriately skilled employees in a competitive market through the delivery of competitive remuneration packages.
- To give effect to the principle of rewarding those who contribute most in their role and in supporting realisation of the Company objectives through a responsive and effective remuneration framework that recognises this enhanced contribution.
- To support IPB employees in creating sustainable results in the interests of all stakeholders and clearly linking the interests of our key stakeholders and employees through an appropriate Remuneration and Benefits Framework.
- To support the Committee and the Board through their annual cycles of work, ensuring that periodic reviews are performed to inform engagement by their appointed independent advisors in providing independent and objective advice to support their decision making. The company provides employees, including Executive Directors, with a range of benefits including income protection and death in service benefits. Employees are also provided with health insurance contributions and contributions payable into Personal Retirement Savings Accounts (defined contribution plans) based on percentage of salary, to which they can voluntarily contribute to suit their circumstances whilst early retirement schemes are not available. A comprehensive Learning and Development framework, supported by educational assistance and comprising internal and external training and leadership development, is available to employees. Share options or shares do not form part of the available employee benefits however the company operates an annual bonus plan for employees payable in addition to contractual remuneration. The focus of the company's approach to variable remuneration, which is secondary in terms of quantum and certainty of availability relative to fixed remuneration, is on ensuring sound and effective risk management and avoidance of potential perception or encouragement of excessive risk taking. This is achieved through framing eligibility to participate on satisfactory company and individual performance, inclusion of financial and non-financial measures and with submission of the company Performance

Objectives against which overall financial performance is measured and evaluated to the Remuneration Committee and the Board for annual review and approval.

The company, through the Remuneration and Nomination Committee of the Board of Directors, continually reviews the Remuneration and Benefits Framework in place to ensure that it is appropriate in the context of all regulatory and compliance requirements including the Corporate Governance Requirements for Insurance Undertakings 2015, the Central Bank of Ireland's Guidelines on Variable Remuneration Arrangements for Sales Staff issued in 2014, the EIOPA Guidelines on the System of Governance and the Solvency II Delegated Regulation (EU) 2015/35 (including Solvency II Article 275 requirements) and other relevant considerations.

#### Material Transactions with Members during the reporting period

The company issued a number of loans to local authorities for the purpose of developing local community initiatives (including local authority premises, roads and amenities). The company ceased providing these loans with effect from 2009, therefore there were no loan advances made to local authorities during the year. Loan capital repayments and interest payments made by the local authorities during the year amounted to €3.1 million (2016: €2.5 million). Loan balances outstanding at year end amounted to €20.4 million (2016: €23.5 million). During the year, the company also paid a Members' dividend of €15 million (2016: €15 million) and paid an initial €20.9m of a retained earnings distribution of €200m which is to be paid to Members over a 5-year period. During 2017 the company did not make any additional contributions to the Social Dividend Fund as part of its corporate social engagement (CSE) framework (2016: €1m); however, the company did continue to make payments from the fund to appropriate recipients.

#### B.2 "Fit and Proper "requirements

The company has always been committed to ensuring its employees are of the highest calibre. The company's Fitness & Probity & Minimum Competency Policy illustrates its commitment to adherence to legal and regulatory requirements in engaging personnel and reinforces the philosophy of ensuring that all employees perform their duties with integrity and a strong sense of ethical responsibility.

Its provisions apply to any employee, non-employees such as Director, candidates or third-party service providers (collectively referred to as Employees) of the company who performs duties which are considered, by the Central Bank to involve either a Controlled Function (hereafter a 'CF') or a Pre-approval Controlled Function (hereafter a 'PCF'). Its provisions apply from the beginning of the recruitment process and due regard to them must be considered as mandatory during any recruitment of persons performing duties involving a CF or PCF, and the application of the Fitness & Probity (hereafter 'F&P') Standards and the Minimum Competency Code and Regulations 2017 (hereafter "the F&P regulatory requirements") remain applicable and must be maintained throughout their employment with the company.

#### **Standards**

In order to meet the F&P regulatory requirements, the company does not allow a person to perform duties involving a CF or a PCF, unless satisfied, on reasonable grounds, that he/she meets the Central Bank Standards. As an employer, the company is responsible for ensuring that each of its personnel meets the F&P regulatory requirements, on entry to the financial services industry and throughout their career.

The company is satisfied of its ability to judge whether an individual has the competence, experience and ability to understand the technical requirements of the business, the inherent risks and the management processes required to conduct the operations of the company effectively. Whereas common standards of

probity apply regardless of the size or activity of the company, the competence requirements will vary to reflect the nature of the post and the size and activity of the company and the applicable approach ensures that the company undertakes necessary due diligence to ensure satisfaction of the F&P regulatory requirements. In meeting the F&P regulatory requirements, a person performing duties involving a PCF or a CF role in the company must be:

- Competent and capable;
- Honest and ethical and act with integrity; and
- Financially sound.

The company undertakes a number of procedures to ensure the above requirements are met and to ensure compliance with the F&P regulatory requirements and the company's F&P Policy. Such procedures include the following:

#### Heads of Department

Heads of business departments within the company have overall responsibility for ensuring that their respective departments are aware of and adhere to this Policy and to provide relevant information to the Human Resources Department and the Compliance Department as requested in relation to compliance with the Policy.

#### Compliance Department

The Compliance Department ensure that the Policy is circulated to all employees and that education and training in relation to the Policy is provided as required. In addition, the Compliance Department will review compliance with the Policy as part of the overall compliance monitoring programme and ensure adherence to regulatory requirements.

#### Human Resources Department

The Human Resources Department is responsible for the implementation and maintenance of the company's Recruitment and Selection Policy which sets out the process for the recruitment of internal and external candidates to the company. The Recruitment & Selection Policy sets out the due diligence to be performed when recruiting for PCF and CF roles by management and HR.

In addition, the Human Resources Department is responsible for the maintenance of the internal registers related to F&P. The F&P Register must record all PCF and CF roles, both present and past. These registers are now maintained on a HR Compliance Module.

The Human Resources Department must ensure that the contract of employment for all new hires and appointees (whether PCF or otherwise) provides that the offer is subject to the necessary preemployment fitness and probity screening.

#### Company Secretariat

The Company Secretariat Department is responsible, in conjunction with the Directors themselves, for ensuring INEDs and GNEDs are in compliance with this Policy and the relevant regulatory requirements.

#### Remuneration Committee

In accordance with the Terms of Reference of the Remuneration Committee, the proposed arrangements particular to all employees categorised as PCF, CF1, must be presented to the Remuneration Committee for approval and to the Board for noting before they commence employment with the company. The

Remuneration Committee must be provided with the following documents to assist in informing the decision-making process:

- Company Recruitment Requisition Form setting out the category for Remuneration Committee Approval
- CV listing qualifications
- Role Profile with relevant PCF, CF1 designations
- Proposed Remuneration terms and benefits in relation to the role and candidate
- IQ declaration (if PCF role), and
- Any other documentation as may be required.

#### Due Diligence

The company is required to undertake due diligence to ensure that the F&P Standards are met. The Recruitment & Selection Policy sets out the due diligence to be performed when recruiting all staff members including PCF and CF role holders.

The company conducts due diligence via:

- · examination of the candidate's CV
- interview process
- reference checking
- evidencing professional qualifications and professional body registration
- evidencing MCC compliance including compliance with CPD requirements
- F&P declaration
- role profile and ability to discharge concurrent responsibilities
- financial soundness
- previous disqualifications, restrictions or administrative sanctions

In the event that any material items are identified during the due diligence process this will be duly addressed and appropriately actioned. The company may engage with an external provider to assist with conducting due diligence.

Offers of employment are subject to full compliance being met by the candidate through F&P regulatory requirements, reference, professional memberships and qualification, court judgements checking.

This checking process is conducted by an external provider on behalf of the company. This service provides an independent, objective check in relation to candidates.

#### **Outsourced Functions**

#### Pre-approved Control Functions (PCF)

The company requires that all persons performing duties involving a PCF role on an outsourced basis are compliant with the F&P regulatory requirements.

Where performance of such duties is outsourced to an 'unregulated entity', the company requires the identity notification of the individual who will perform them on an outsourced basis as it obtains the Central Bank's approval prior to the appointment of any such individual.

#### **Control Functions**

Where performance of duties involving a CF function is outsourced to an 'unregulated entity', the company requires the unregulated entity to be able to identify the individuals who perform such duties, and assess whether they are compliant with the F&P regulatory requirements and obtain agreement to abide by them.

The company requires an outsourced unregulated entity performing a CF role on its behalf to furnish the company with confirmation of all F&P requirements (including sample documentation as to how the compliance is adhered to for each person) and to provide written confirmation that the individuals performing the CF have agreed to abide by the F&P regulatory requirements.

#### Ongoing Nature of Fitness and Probity requirements

F&P requirements are relevant and must be adhered to for the duration of an individual's employment with the company. On an annual basis, the company requires all relevant employees to complete a F&P declaration and confirmation so that any material changes to the employees F&P status can be communicated to the company. All F&P declarations and confirmations are submitted to HR for retaining on the employees file.

# B.3 Risk Management System including the Own Risk and Solvency Assessment Risk Management Structure

Risk management is central to safeguarding the promise that the company makes to its policyholders and Members and in the interests of all stakeholders, risk management seeks to:

- Protect the company's operations by promoting a sound culture of risk awareness as well as disciplined and informed risk taking.
- Protect the company's strong capital base by monitoring that risks taken are not beyond the company's risk appetite.
- Support decision making processes by providing consistent, reliable and timely risk information.

The Board of Directors is responsible for ensuring that risk is effectively managed by those involved in running the company on a day-to-day basis. The Board of Directors establishes prudent and effective controls to manage risk via the risk framework and sets the company's appetite for risk via the Risk Appetite Statement.

The Risk Committee assists the Board of Directors with its oversight of risk and risk management. It meets at least four times per year and follows a structured approach that covers all key risk types within the business, including emerging and strategic risks. The Risk Committee is advised by subject matter experts on risk management, underwriting, claims, investments and compliance.

Risk management is core to all business activities and staff are guided by documented policies and procedures, underpinned by an active and embedded risk management function, intranet, fora and training.

#### The Risk Framework

The risk framework describes the company's system to identify, measure, monitor and manage risk in the business. It ensures that risk management is aligned with the company's strategic objectives and it is

guided by seven key principles. Implementation of the risk framework relies on a system of integrated risk management tools that promote a culture of risk management throughout the company.

The Board of Directors articulates risk appetite in order to ensure the solvency of the company at all times. Risk appetite is ultimately expressed in terms of detailed operating limits that guide the day-to-day activities of those entrusted to run the business. This enables the company to pursue its strategic objectives while limiting risk in a transparent and structured manner. All risks are monitored regularly and certain risk types are monitored daily. Procedures are in place to reduce risk levels should operating limits be threatened and a system of intermediate warning points is used to ensure that remedial action can be taken long before a breach is threatened as shown below:



#### Within Risk Appetite Status

The company is normally expected to operate within Risk Appetite.

#### Risk Appetite Proximity Warning

A Risk Appetite Proximity Warning indicates that a Risk Appetite Alert is threatened and corrective action is required.

In the event of a Risk Appetite Proximity Warning the head of risk and the relevant business area shall take appropriate immediate steps to return the company to risk appetite. The head of risk shall inform the CEO without undue delay and in any case within 2 business days of detection. The head of risk and CEO shall decide on the need for further escalation. In any case, the Proximity Warning shall be noted at the next Risk Committee meeting and reporting to the Risk Committee shall continue until risk appetite is restored.

#### Risk Appetite Alert

A Risk Appetite Alert indicates that a Risk Appetite Limit breach is threatened and swift and decisive corrective action is required.

In the event of a Risk Appetite Alert the head of risk and the relevant business area shall take the appropriate immediate steps to return the company to risk appetite. The head of risk shall consider engaging the company's Incident and Error Management Policy. The head of risk must inform the Risk Committee and any other relevant internal stakeholder without undue delay and in any case within 3 business days of detection. If Risk Appetite has not been restored the Risk Committee must meet within 5 business days of being informed of an Alert and the Risk Committee will be furnished with a report giving full details of the Alert together with a recommended plan to restore Risk Appetite. The Risk Committee shall decide on further escalation to the Board. In any case, the Risk Appetite Alert is noted at the next

Board meeting. Reporting continues until risk appetite is restored, at a reporting frequency and level of detail to be determined by the Risk Committee.

#### Risk Appetite Limit Breach

A Risk Appetite Limit breach is serious and requires prompt action at Board level.

In the event of a Risk Appetite Limit breach the head of risk must engage the company's Incident and Error Management Policy informing the Board without undue delay and in any case within 2 business days of detection. The Board shall be briefed and furnished with a recommended plan to return to Risk Appetite. The Board must agree actions within 3 business days of being informed of a breach. The details of the breach and the planned actions to remedy the breach must be communicated to the Central Bank of Ireland by the Board promptly in writing and no later than 5 business days of the Board becoming aware of the breach. Reporting is carried out until the breach is closed, at a reporting frequency and level of detail to be determined by the Board.

The Risk Committee and the Board of Directors are regularly and at least annually informed by a comprehensive Risk Report and subject experts from relevant areas of the company. The Risk Report covers all risk types and includes detailed risk metrics and other data on key risk exposures. It also captures detailed information at the individual risk level. A dynamic Operational Risk Register is the key tool in the management of operational risk. The risk management function engages with staff at all levels to ensure a detailed understanding of the various operational risks to which the company is exposed. The management of risk is further facilitated by a robust incident management policy promoting the prompt reporting and root cause analysis of incidents and errors.

Risk and other company policies define the formal risk management and risk control requirements of the company. The effectiveness of policies and key controls is regularly reviewed and tested.

#### Own Risk and Solvency Assessment (ORSA)

The company uses the Solvency II Standard Formula to quantify risks in the business. The appropriateness of the Standard Formula is assessed as part of the Own Risk and Solvency Assessment (ORSA) process.

The ORSA is the entirety of the processes employed to identify, assess, monitor, manage, and report the material risks that the company faces, or may face. It expresses overall solvency needs in quantitative terms where possible, complemented by a qualitative description of the material risks.

The ORSA determines the overall capital necessary to achieve the strategic objectives of the company under a range of scenarios, including ensuring that solvency needs are met at all times. It also considers deviations from the assumptions underlying the SCR calculation.

The scope of the ORSA extends to all material risks and capital needs that the company faces, or may face, and extends beyond regulatory capital requirements. The scope of the ORSA includes an assessment of:

- Overall solvency needs given the risk profile, risk appetite and strategic objectives
- Continuous compliance with capital requirements
- The significance with which the risk profile deviates from the Capital Model

The ORSA shall be conducted in a manner that is proportional to the nature, scale and complexity of the risks to which the company is exposed. The ORSA is conducted throughout the year on an annual cycle

and relates to a 12-month period. Any material change to the business strategy also triggers an interim ORSA.

The ORSA serves as a tool to enhance the company's understanding of the interrelationships between its risk profile and capital needs. The ORSA considers all reasonably foreseeable and relevant material risks, is forward-looking and congruent with the company's business and strategic planning.

The ORSA process encompasses governance, policy and key business processes and consequently, it relies on frequent input from a large group of people which is facilitated by the head of risk being well embedded in the business. Formal documentation of processes and outcomes is detailed throughout the business, spanning various critical business processes including strategic objective setting, business planning, risk appetite calibration, risk management and capital management. The ORSA is subject to regular independent review, with annual review by the head of actuarial function. The conclusions drawn from the reviews are reported to the Risk Committee and the Audit Committee. To this end, an opinion on the ORSA is completed separately and provided to the Risk Committee and the Board of Directors for discussion. The ORSA is owned and subject to approval by the Board of Directors on an annual basis.

#### B.4 Internal Control System

#### Description of Internal Control System

The Board of Directors is responsible for the company's internal controls system and its effectiveness. The system is designed to manage rather than eliminate the risk of failure to achieve business objectives, and can provide only reasonable and not absolute assurance against material misstatement and/or loss. In accordance with the Central Bank of Ireland Corporate Governance Requirements for Insurance Undertakings 2015, the Board of Directors confirms that there is an on-going and regularly reviewed process for identifying, evaluating and managing any significant risks faced by the company. The key risk management and internal control layers that provide strong assurance to the Board of Directors include:

- Board Committees (as previously mentioned).
- An internal audit function and internal control framework which includes senior management
  whose leading role is to identify, keep under review and manage significant internal control risks
  facing the company.
- Underpinning all aspects of the business is a robust **risk management function** that oversees a risk management framework which includes the operation of approved risk management policies in the areas of underwriting, reinsurance, claims reserving and investments.
- A robust compliance function that oversees compliance and a regulatory governance framework providing assurance that the company operates in a transparent, controlled and compliant manner.
- A **legal function** that identifies legal risks, providing legal advice across all business units and promotes the value of in-house legal services.
- A comprehensive system of functional level controls that are overseen by the various heads of functions including, inter alia, financial controls incorporating budgeting, periodic financial reporting and variance analysis.
- Operational controls such as Physical Access Controls, IT Controls, Policies and Procedures, Four Eye Reviews, Segregation of Duties and Authorisation Limits.

All the above layers are reinforced by skilled and experienced management and employees who operate within an organisation structure of clearly defined lines of responsibility and authority.

The various layers of governance and control functions help to ensure that risks applicable to the company are identified and appropriately managed and internal controls are in place and are operating effectively. Supporting these layers of oversight are a number of internal controls that are pervasive across the organisation.

#### Description of how the compliance function is implemented

#### Position within IPB Insurance

The compliance function is led by the head of compliance. The head of compliance is responsible for the compliance function and reports to the Finance Director with additional reporting lines directly to the CEO and Board of Directors. The role of the head of compliance includes both the management of regulatory matters and the oversight of the implementation of relevant legislation by Management as required within the business. This is with the co-operation and strong participation of Management within that process particularly with respect to the day to day operational requirements which are the responsibility of Management.

The head of compliance is an invitee to the Board of Directors, Audit Committee and the Risk Committee and the Remuneration and Nomination Committee, as required. The head of compliance retains direct access to the Board of Directors should the need arise.

#### Rights & Powers

The compliance function is given independence and sufficient authority and resources to enable it to carry out its tasks in an effective manner. The compliance team has a right on its own initiative, subject to the authority of the Finance Director or the CEO or the Chairman of the Audit Committee or the Board as appropriate in the circumstances, to obtain access to all information necessary to carry out its activities, and all employees have a corresponding duty in consultation with their manager or respective leadership team representative to co-operate in supplying this information.

#### Roles & Responsibilities

The role of the compliance function is to provide sufficient assurances to the Board of Directors to enable it and its members to discharge its statutory duties to ensure compliance with relevant obligations. The compliance function reports monthly to the Board of Directors via the Monthly Compliance Report. The compliance function is responsible for the following as set out in its Departmental Compliance Manual:

- Compliance Management, Oversight and Reporting
- Code of Corporate Governance / Annual Compliance Statement
- Regulatory Review / Monitoring
- Compliance Risk Management
- Operations Compliance
- Legislative Obligation Register / Compliance Framework
- Regulatory Examinations
- Customer Complaints
- Whistle-blowing Policy
- Provision of advice as detailed within the company's Fraud Policy.

#### **B.5 Internal Audit Function**

#### Description of how the internal audit function is implemented

#### Position within IPB Insurance

The role of the internal audit function is to provide independent, objective assurance in relation to the effectiveness of the company's internal control system. At present, the internal audit Function is outsourced to KPMG with an Engagement Letter and contract governing the related relationship.

The company's internal audit function's primary reporting responsibility is to the Chair of the Audit Committee. The internal audit function also reports directly to the CEO and/or Audit Committee on findings in respect of the above or other material considerations which may come to light. In addition, it may address such issues with the appropriate level of senior management and will have direct access to the Chairman of the Board of Directors. It also engages with the head of compliance as relationship manager for this outsourced function with a view to ensuring that the function operates effectively within the company and is supported by Management.

#### Roles & Responsibilities

The primary role of the internal audit function is to ensure that the internal audit process is performed for the company in an efficient and effective manner. The internal audit functions are carried out using a risk-based approach, and addresses:

- Compliance adherence to legislation, as well as to the company's established policies, standards, and procedures
- Operational the quality of formal policies, standards, and procedures, and the quality of management, efficiency of operations, the design and maintenance or the adequacy of procedures and internal controls
- Integrity systems integrity and soundness, including design and implementation, fraud, monitoring of employee activities, and the reliability and integrity of financial matters
- Safeguard of Assets reasonable assurance regarding prevention, timely detection of unauthorised acquisition, use or disposition of the company's assets.

#### Description of how its independence and objectivity is maintained

As a role involving performance of a control function, the internal audit function operates independently of the business units of the company. The internal audit function will be given independence and sufficient authority and resources to enable it to carry out its tasks in an effective manner.

Should the internal audit function conclude that its independence and/or authority has been compromised, these concerns should be brought to the attention of the CEO and/or the Board of Directors.

The Audit Committee carries out an assessment of the independence of the internal audit function on an annual basis.

#### **B.6 Actuarial Function**

#### Description of how the actuarial function is implemented

#### Position within IPB Insurance

The actuarial function is led by the head of actuarial function (HoAF). During the year and in the context of ensuring appropriate resourcing throughout a leave period, the HoAF was temporarily outsourced to Willis Towers Watson with an Engagement Letter and contract governing the related relationship.

The HoAF is responsible for the effective delivery of the actuarial function and reports to the Finance Director with additional reporting lines directly to the CEO and Board of Directors. The HoAF role includes provision of regulatory related material (required actuarial reports and supporting analysis) and other day-to-day tasks around pricing and general reserve management.

The HoAF is an invitee to the Board of Directors, Audit Committee and the Risk Committee, as required. The HoAF retains direct access to the Board of Directors should the need arise.

#### Rights & Powers

The actuarial team operates with independence in the assessment of the reserves and has access to all information required in the performance of this function.

#### Roles & Responsibilities

The main role of the actuarial function is to provide required regulatory assessments for the company, including an opinion on the technical provisions of the company, with formal sign-off to the Central Bank of Ireland in the form of the actuarial opinion on Technical Provisions accompanied by the actuarial report on Technical Provisions. Other statutory opinions provided annually include the actuarial opinion on the ORSA, the actuarial opinion on underwriting and the actuarial opinion on reinsurance.

The actuarial function provides quantitative information required for the ORSA, including assessments of the SCR under forward looking scenarios and stress testing. Other input includes contributing to the identification and assessment of risks to which the company is exposed.

In addition, the actuarial function conducts many day-to-day tasks for the company, including providing independent pricing valuations, involvement in reinsurance renewals and calculation of the technical provisions on a quarterly basis.

Potential conflicts of interest between the responsibilities specified under Solvency II regulation, and other day-to-day activities have been addressed by:

- Personal performance of HoAF is not based on measures that conflict with the independence of opinions
- The HoAF does not have reporting lines in to Underwriting or Reinsurance
- The HoAF has day to day reporting lines to the Finance Director, CEO and overall to the Board of Directors with the prerogative to raise issues directly with the Board of Directors if required
- The HoAF does not have direct responsibility for premium rates or reinsurance purchase
- All pricing / reinsurance decisions are subject to approval by committees and its Board of Directors.

#### **B.7** Outsourcing

Under Article 51(1) of S.I. No. 485 of 2015, organisations are required to remain fully responsible for discharging their legal and regulatory obligations when outsourcing functions to third parties.

In order to ensure that this obligation is adhered to, the company has documented an Outsourcing Policy which sets out the process to be followed when appointing third party outsource service providers, the required contents of Service Level Agreements with the providers and guidance as to how adherence to service standards documented in Service Level Agreements should be monitored, including the performance of audits of service providers as is required by the nature of the outsourced service. The Outsourcing Policy is regularly reviewed, updated and approved by the Board of Directors.

As stated above, the internal audit function is outsourced to KPMG, Ireland and the head of actuarial function is outsourced to Willis Towers Watson. The company has the following additional key outsourced services:

Supplier Name	Description of Service Provided
Lansdowne Risk Solutions Ltd, Ireland	Risk Survey Provider
Nigel Dawkins, Ireland	Risk Survey Provider
Acacia, Ireland	Café/Building Maintenance
Expert Payroll, Ireland	Payroll
Another 9, Ireland	Cloud Backup Services

#### B.8 Assessment of Governance

The company completes an annual corporate governance code review assessing its compliance with the Corporate Governance Requirements for Insurance Undertakings 2015 providing the company with an opportunity to assess itself and evidence its compliance with these requirements annually. Where there are changes to the business strategy that may result in changes to internal processes and products, processes exist such as the New Product Approval Process to ensure the effective inclusion of all areas of the business to assess both the impact and risk of such changes to the business model. There is also ongoing assessment of internal controls that support the company's effective decision making and governance through the company internal audit programme, the compliance monitoring and review programme and the risk review programme. These individual review programmes provide their outputs to the Board of Directors and its Committees as part of the regular reporting issued by each function. The Board of Directors of the company are responsible for the oversight and effective implementation of best practices as well as regulatory requirements for corporate governance within the company. The regular internal review carried out on the company's system of governance is in accordance with Regulation 44(3) and 44(9) of SI.485.

The company has no further information to disclose relevant to its systems of governance.

#### C: Risk Profile

#### Risk Management Objectives and Risk Profiles

The risk management function is led by the head of risk and is responsible for the design and implementation of the risk management system. It oversees the identification, measurement, management, reporting and monitoring of all risk types. The company's risk profile is stable and is currently dominated by underwriting risk and market risk. Other key risks which the company faces includes credit, liquidity, operational, cyber, strategic, reputational and conduct risks. The risk management function reports to the Finance Director with additional reporting lines directly to the CEO and Board of Directors.

The key internal risk metric is the Solvency II SCR ("Solvency Capital Requirement") which quantifies the key risks to the business. The SCR is calibrated to a level which is broadly consistent with a 1 in 200-year event over a 12-month time horizon. The SCR facilitates the quantification of risk at the individual risk level and allows for diversification between risk types.

#### C.1 Underwriting Risk

Underwriting risk is the key risk type to which the company is exposed and arises from uncertainty in the occurrence, amounts and timing of non-life insurance obligations. The key risk associated with any insurance contract is the possibility that an insured event occurs and that the timing and amount of actual claim payments differ from expectations. The principal lines of business covered by the company include public liability, employers' liability, motor and property. The company manages underwriting risk through its underwriting strategy, claims handling and reinsurance arrangements. Insurance obligations can take many years to settle and the company sets aside reserves to cover all past liabilities. There is a risk that the cost of these liabilities may be higher than anticipated, in some cases significantly so.

#### Risk Exposure

Underwriting risk is restricted to lines and territories where the company has an underwriting competency. Where regulations permit, policy limits are set at a level to mitigate the impact of extreme loss experience to a manageable proportion of capital.

The key underwriting risk metric is the Net Loss Ratio. This assesses claim performance versus premium earned. It is recognised that the insurance cycle, exceptional individual losses, catastrophes, the inherent volatility of insurance losses and other dynamics will cause underwriting performance to fluctuate over time. Whilst the company will tolerate a degree of short term volatility, a more stringent standard is set in the longer term. As at the 31 December 2017, the company's net loss ratio stood at 82.8%.

#### **Risk Concentration**

As a niche mutual insurer, the company is susceptible to claim aggregation due to policyholders being concentrated by type, risk exposures and other factors. Most underwriting risk is concentrated in the Republic of Ireland. Business is also concentrated by line of business, being predominantly Public Liability, though there are material volumes of Employers Liability, Property and Commercial Motor. Smaller volumes of Personal Motor, Professional Indemnity and other lines offer further diversity. The other significant insurance risk concentration relates to the fact that the company primarily insures public sector organisations. While keeping the insurance needs of Members at the top of the agenda, the company endeavours to apply core underwriting competencies to further diversify the insurance portfolio into complementary lines and policyholders. In any case, concentrations are actively managed and are significantly mitigated by an appropriate reinsurance programme.

#### Risk Mitigation

The Underwriting Policy which is approved by the Board of Directors, establishes the underwriting strategy and principles and it defines underwriting limits, risk selection, authorities, escalation procedures and actuarial review requirements. It is implemented by means of underwriting guidelines. As with all company policies, the Underwriting Policy, together with, the underwriting approval limits set out in the company's Authorisation Levels and Signatories, are reviewed on an annual basis to ensure their continued effectiveness. The company has developed its underwriting strategy to diversify the type of insurance risks written, and within each of the types of risk, to achieve a sufficiently large population of risks to reduce the variability of the expected outcome. The underwriting strategy includes the employment of appropriately qualified underwriting personnel, the targeting of certain types of business, constant review of pricing policy using up-to-date statistical analysis and claims experience and the surveying of risks carried out by experienced personnel.

The Reinsurance Policy which is approved by the Board of Directors establishes the reinsurance strategy and principles. The extensive reinsurance programme, delivered by a well-diversified panel of high quality Reinsurers, reduces the variability of the underwriting result. For its motor, employers' liability and public liability business, the company has in place excess of loss reinsurance treaties. For its property business, the company operates proportional and catastrophe reinsurance treaties. Again, the Reinsurance Policy, together with, the relevant approval limits set out in the company's Authorisation Levels and Signatories, are reviewed on an annual basis to ensure their continued effectives.

A primary objective of the company is to ensure that sufficient reserves are available to cover liabilities. The company uses an in-house actuarial team supported by external reviews to assist with the estimation of liabilities to ensure that the company's reserves are adequate and there is oversight of the reserving process through internal management and Board committees. The company holds a margin for uncertainty in addition to best estimate reserves to reduce the likelihood of inadequate reserves materialising.

#### C.2 Market Risk

Market risk arises from financial instrument market price volatility. It reflects the structural mismatch between assets and liabilities, particularly with respect to duration. It includes interest rate risk, equity risk, property risk, spread risk, currency risk and asset concentrations.

#### Prudent Person Principle

Company assets are invested in highly rated investments in accordance with the "prudent person principle". Investment decisions are made in the best interests of policyholders and other beneficiaries. Consequently, the fundamental objective is that all valid claims and expenses are paid as they fall due. In practice, assets are allocated into two notional portfolios which have different objectives — The Matched Portfolio and The Risk Portfolio.

#### The Matched Portfolio

The primary investment objective of the matched portfolio is to ensure that the company meets policyholder obligations as they fall due. This implies high quality, secure and liquid investments with characteristics that approximately match those of the liabilities. The secondary investment objective of the Matched Portfolio is to maximise investment returns over the long term to contribute to long term profitability, subject to a pre-defined and limited risk appetite as per the Risk Appetite Statement. The performance of the Matched Portfolio will be assessed on a total return basis against a benchmark portfolio which approximates to a risk-free portfolio with a duration profile equal to that of the liabilities.

#### The Risk Portfolio

The risk portfolio is composed of all investments that are surplus to the Matched Portfolio. The primary investment objective of the risk portfolio is to contribute to long term profitability through investment returns. The secondary investment objectives of the risk portfolio are capital preservation, diversification of the overall portfolio and facilitation of the long term strategic objectives of the company, subject to a pre-defined and limited risk appetite. The performance of the risk portfolio is assessed on a total return basis against a combination of published benchmark indices which together approximate to the profile of the Risk Portfolio in terms of asset classes, territories, duration and other characteristics.

#### Risk Exposure

The level of surplus assets currently in the business results in a risk profile that has a significant weighting towards market risk. The principal market risk relates to equity holdings. The company invests only in assets and instruments whose risks can be properly identified, monitored, managed and taken into account in the assessment of solvency. The company follows a high quality, low risk investment strategy aligned to the prudent person principle. The focus is on high quality bonds and cash, with limited holdings in equities and property.

#### Interest Rate Risk

Interest rate risk relates to the sensitivity of the values of assets and liabilities to changes in the term structure of interest rates. The company faces a significant interest rate risk due to the nature of its investments and liabilities. Interest rate risk arises primarily from the company's investments in fixed interest debt securities and from insurance liabilities.

As at 31 December 2017, the company had the following assets that are exposed to interest rate risk as per the IFRS Financial statements:

Financial assets subject to interest rate risk		
	2017	2016
	€′000	€′000
Debt securities		
- Irish Government fixed-interest bonds	143,685	139,607
- Other government fixed-interest bonds - eurozone	384,663	368,659
- Other government fixed-interest bonds - non-eurozone	103,393	97,922
- Corporate bonds	78,225	77,126
Loans and receivables		
- Loans to local authorities	-	-
Total	709,966	683,314

#### Equity Risk

Equity risk relates to the volatility of equity market prices. This volatility may be caused by factors specific to the individual financial instrument, factors specific to the issuer or factors affecting all similar financial instruments traded in the market. Equity risk excludes changes due to currency movements, which is considered as a separate risk type. The company is subject to equity risk due to changes in the market values of its holdings of quoted shares, unquoted shares and managed funds.

#### Property Risk

Property risk relates to the volatility of real estate market prices. The company is subject to property risk due to changes in the market values of its investment properties.

#### Spread Risk

Spread risk mainly relates to changes in the market value of bonds due to changes in the credit standing of the issuer. The company limits the credit quality of bonds in which it may invest.

The following table provides information as per the IFRS Financial statements regarding the market risk exposure of the company by classifying debt securities by credit ratings as at 31 December 2017:

Market risk exposure by creditrating							Not	
	AAA	AA	A	BBB	BB	В	rated	Total
2016 to 2017	€'000	€′000	€′000	€′000	€'000	€′000	€′000	€′000
Financial assets at fair value through profit or loss								
Debtsecurities								
2017	234,560	259,419	171,741	-	24,653	-	81,160	771,533
2016	246,194	241,223	191,332	-	-	24,582	31,662	734,993

#### Currency Risk

Currency risk relates to the sensitivity of the value of assets and liabilities to changes in currency exchange rates. The company's liabilities are mostly denominated in euro. The company holds investment assets in foreign currencies, which gives rise to exposure to exchange rate fluctuations. The company is only exposed to high-quality currencies including sterling (GBP) and Norwegian Krone (NOK).

As at 31 December 2017, the carrying amount of the company's foreign currency denominated assets as per the IFRS Financial statements was as follows:

Carrying amount of the company's foreign currency denominated assets	Foreign currency	Foreign currency	
	gross	derivatives	Net
2017	€'000	€'000	€′000
British Pounds (GBP)	69,897	60,668	9, 229
Norwegian Krone (NOK)	12,957	4,072	8,885
Danish Krone (DKK)	18,035	10,750	7,285
Swedish Krona (SEK)	987	814	173
Swiss Francs (CHF)	5,274	5,129	145
US Dollars (USD)	13,463	9,920	3,543
Total	120,613	91,353	29,260

Carrying amount of the company's foreign currency denominated assets	Foreign currency	Foreign currency	
darying amount of the company storeign contents acronimated assets	gross	derivatives	Net
2016	€000	€'000	€′000
British Pounds (GBP)	63,124	59,539	3,585
Norwegian Krone (NOK)	28,017	20,275	7,742
Danish Krone (DKK)	20,219	19,510	709
Swedish Krona (SEK)	1,028	836	192
Swiss Francs (CHF)	6,449	6,065	384
US Dollars (USD)	12,843	8,011	4,832
Total	131,680	114,236	17,444

#### **Asset Concentration**

Asset concentrations arise where there is a lack of diversification, e.g. by issuer.

#### **Risk Concentration**

Assets are diversified to avoid accumulations of risk in the portfolio as a whole. In particular, the company is not exposed to an excessive reliance on any one asset, asset class, counterparty, group of counterparties, territory or other investment characteristic. This is achieved by concentration limits and tolerance thresholds defined in the Risk Appetite Statement.

#### Risk Mitigation

Market risk is managed through the application of the company's Investment Policy and Risk Appetite Statement, each of which have been approved by the Board and reviewed on an annual basis. The Investment Policy outlines how market risks are managed. Investments are limited to assets whose risks can be properly identified, monitored and managed. The company employs appropriately qualified and experienced personnel to manage the investment portfolio. The Risk Appetite Statement defines the extent of permissible market risk exposures in terms of specific operational limits. It imposes limits on quantity, currency, territory, diversification, issuer credit quality, issue credit quality, duration and other characteristics. The company also enters into forward currency contracts to mitigate against currency risk. Consideration is given to the additional risk that a derivative presents, therefore, derivative counterparties are subject to minimum credit rating requirements and are required to be approved credit institutions. The continued effectiveness of these risk mitigation techniques is regularly monitored through a series of stress testing and scenario analysis, together with, internal audit reviews.

#### C.3 Credit Risk

Credit risk arises from an unexpected default or deterioration in the credit standing of counterparties and debtors, including reinsurance and premium receivables.

#### Risk Exposure

The company is exposed to credit risk from its operating activities, principally customer and reinsurer receivables, but also from cash deposits and loans to local authorities. A portion of member business is retro-rated which allows Members to pay premium as losses are reported or paid, depending on the contract, rather than paying all premium up front.

#### **Risk Concentration**

Credit concentration risk is managed via the company's Risk Appetite Statement. The Risk Appetite Statement requires diversification by reinsurance counterparty. In particular, no reinsurance counterparty may exceed 15% of the total reinsurance asset. This limit is increased to 25% for reinsurance counterparties with the very highest credit ratings, typically equivalent to S&P AA- or better. Limits are also set out in the Risk Appetite Statement for cash balances with credit institutions. The limits tend to be based on the credit quality of the approved credit institution.

#### Risk Mitigation

The Risk Appetite Statement sets out the operating limits for each reinsurance counterparty, cash counterparty and other credit exposures. The Risk Appetite Statement is regularly assessed for appropriateness and is approved by the Board of Directors annually. It is also planned to phase out retro premiums in the future, thereby, reducing the risk in this regard.

The following table shows the carrying value of assets that are neither past due nor impaired, the ageing of assets that are past due but not impaired, and assets that have been impaired as per the company's IFRS Financial statements.

2017						Carrying amount €'000
Debtsecurities	771,533	-	-	-		771,533
Other investments	221, 235	-	-	-		221,235
Reinsurance assets (outstanding claims and receivables)	37,053	-	-	-		37,053
Loans and receivables	30,464	-	-	-	-	30,464
Insurance receivables	18,740	285	239	163	732	20,159
	1,079,025	285	239	163	732	1,080,444

					Past due more than 90 days	Carrying amount
2016	€′000	€′000	€'000	€′000	€′000	€′000
Debtsecurities	734,993	-	-	-		734,993
Other investments	232,468		-	-		232,468
Reinsurance assets (outstanding claims and receivables)	47,982	149	-	1	(15)	48,117
Loans and receivables	23,379	73	-	-		23,452
Insurance receivables	4,445	793	3,569	191	1,692	10,690
	1,043,267	1,015	3,569	192	1,677	1,049,720

#### C.4 Liquidity Risk

Liquidity risk is the risk that the company does not have sufficient liquid financial resources, such as cash, to meet its financial obligations when they fall due. Liquidity risk also arises where assets can only be liquidated at a material cost.

#### Risk Exposure

The company is exposed to daily calls on its cash resources, mainly for claims and other expense payments.

#### Risk Mitigation

The Investment Policy is reviewed annually for continued effectiveness and sets out the assessment and determination of what constitutes liquidity risk for the company. Compliance with the policy is monitored and exposures and breaches are reported to the Risk Committee. Guidelines are set for asset allocations, portfolio limit structures and maturity profile of assets in order that sufficient funding is available to meet insurance contract obligations. Asset liquidity is such that it is sufficient to meet cash demands under extreme conditions. Localisation of assets is such that it ensures their availability. The Investment Policy specifies a Contingency Funding Plan should a liquidity shortfall arise. The company has mitigated much of its liquidity risk through asset and liability matching. The company does not forecast expected profit in future premium (EPIFP) to cover a loss-making scenario, liquidity risk in this regard is therefore not an issue.

The following table shows the maturity analysis of financial assets and financial liabilities based on the remaining undiscounted contractual obligations as per the company's IFRS Financial statements.

Maturity analysis (contracted	Carrying	Within 1	Within 1	After 5	No maturity	
undiscounted cash flow basis)	value	year	to 5 years	years	date	Total
2017	€′000	€′000	€′000	€′000	€′000	€′000
Financial assets						
Derivative financial instruments	531	531	-	-	-	531
Financial assets at fair value through profit or loss						
Debt securities	771,533	213,750	240,881	222,991	10,231	687,853
Equity securities	221,235	-	-	-	221,235	221,235
Loans and receivables						
Loans to local authorities	20,429	2,266	8,869	9,826	-	20,961
Deposits with credit institutions	10,035	10,035	-	-	-	10,035
Insurance assets	23,966	5,752	15,218	2,996	-	23,966
Reinsurance assets						
Claims outstanding	32,484	13,871	16,989	1,624	-	32,484
Insurance receivables	24,728	24,728	-	-	-	24,728
Other receivables	123	123	-	-	-	123
Cash and cash equivalents	123,169	123,152	-	-	-	123,152
Total	1,228,233	394,208	281,957	237,437	231,466	1,145,068
Financial liabilities						
Insurance contract liabilities						
Claims outstanding	499,355	213,224	261,163	24,968	-	499,355
Derivative financial instruments	501	501	-	-	-	501
Insurance payables	3,312	3,312	-	-	-	3,312
Trade and other payables	90,815	90,797	-	-	-	90,797
Total	593,983	307,834	261,163	24,968	-	593,965

Maturity analysis (contracted	Carrying	Within 1	Within 1	After 5	No maturity	
undiscounted cash flow basis)	value	year	to 5 years	years	date	Total
2016	€′000	€′000	€′000	€′000	€′000	€′000
Financial assets						
Derivative financial instruments	757	757	-	-	-	757
Financial assets at fair value through profit or loss						
Debt securities	734,993	53,768	323,646	253,592	25,287	656,293
Equity securities	232,468	-	-	-	232,468	232,468
Loans and receivables						
Loans to local authorities	23,452	2,485	9,456	12,164	-	24,105
Deposits with credit institutions	-	-	-	-	-	-
Insurance assets	32,018	8,229	18,570	5,219	-	32,018
Reinsurance assets						
Claims outstanding	46,313	12,903	26,107	7,303	-	46,313
Insurance receivables	12,494	12,494	-	-	-	12,494
Other receivables	139	139	-	-	-	139
Cash and cash equivalents	125,980	125,961	-	-	-	125,961
Total	1,208,614	216,736	377,779	278,278	257,755	1,130,548
Financial liabilities						
Insurance contract liabilities						
Claims outstanding	488,965	136,226	275,630	77,109		488,965
Derivative financial instruments	1,619	1,619				1,619
Insurance payables	3,115	3,115	_	_		3,115
Trade and other payables	9,669	9,669	-	-	-	9,669
Total	503,368	150,629	275,630	77,109	-	503,368

#### C.5 Operational Risk

Operational risk arises from inadequate or failed internal processes, from personnel and systems, or from external events. Operational risk includes legal and regulatory compliance risk but excludes strategic and reputational risk. In particular, the company's operational risk includes outsourcing risks, including bankruptcy of the service providers, disruption of services and failure to achieve standards.

#### Risk Exposure

The company regularly reviews all major operational risks. The Risk Committee reviews the risk assessment to ensure that all operational risks are identified and evaluated. Each operational risk is assessed by considering the potential impact and the likelihood of the event occurring. The effectiveness of internal controls on controlling operational risk is also measured.

Compliance monitoring is carried out on an ongoing basis, according to an annual compliance plan which is approved by the Audit Committee.

Audits are carried out on a continuous basis, in accordance with a rolling internal audit plan approved by the Audit Committee. The internal audit findings are updated on a monthly basis and circulated to the Board of Directors.

#### Risk Mitigation

The company has a Business Continuity Plan for the restoration of functions should critical business processes be disrupted. This Business Continuity Plan is reviewed semi-annually by internal management for its continued effectiveness. As required, any changes to the plan are reviewed and approved by the Risk Committee.

The company outsources certain functions to service providers. Outsourced arrangements are governed by service level agreements. Service providers are required to adhere to company policy. Service providers are subject to detailed reporting requirements.

Over the last year the company has been working to develop its maturity in the field of Information Security and implemented numerous administrative and technical procedures and controls to improve the company's security stance.

#### C.6 Other Material Risks

Other risks to which the company is exposed include strategic risk, reputational risk, conduct risk and cyber risk.

#### Strategic Risk

Strategic risk arises from adverse business strategies, failure to implement business strategies and unanticipated changes in the business environment.

The company takes its strategic direction from the Board of Directors which monitors progress against the business plan which is reviewed annually and is subject to Board approval. The company monitors changes in the business environment and considers their impact on the business. The company also considers the implications that changes in the operating model might have for the quality and efficiency of the service that is provided to Members and other policyholders. Other strategic considerations relate to the efficient use of capital and the company's ability to raise capital in the medium-to-long-term.

The company has considered the impact of Brexit on its business. The company does not believe Brexit will have a significant impact on its business given that its insurance activities are predominantly located in the Republic of Ireland. IPB has however taken a number of actions to mitigate the impact of this risk. The longer term political and economic effects of Brexit are likely to remain unclear for some time however the company will continue to carefully monitor the situation as it develops.

#### Reputational Risk

Reputational risk arising from negative perception of the business amongst Members, customers, the Central Bank, counterparties, business partners and other stakeholders. The company actively manages all sources of reputational risk through its core strategy which is approved by the Board.

#### Conduct Risk

Conduct risk is the risk the company poses to its customers from its direct interaction with them. Conduct risk recognises the risks that can stem from the company's strategy, business model, culture, governance and other internal structures as well as its systems and processes. In IPB this may occur through product design, sales/claims practices and behaviours of individuals at any level within the company. Conduct risk is managed in the company through adhering to all applicable laws and regulations, as well as relevant internal policies and procedures. In addition, there is a clear articulation and embedding of company values and behaviours.

#### Cyber Risk

The company has a responsibility to ensure that it has made every effort to secure the data on its network and to ensure that the systems it utilises are secure and reliable so that it may best serve its Members and clients. Information is one of the company's most important assets and everyone in the company has a responsibility to ensure the security of this information. Accurate, timely, relevant and properly protected information is essential to the successful operation of the company. IPB has in place an established Information Security Framework which details the roles, responsibilities and governance structure put in place by the company to support its information security objectives as well as the policies, procedures and standards which are in force in the company.

#### C.7 Risk Sensitivity Analysis

The tables below provide sensitivity analysis on the company's key risks as per the financial statements. The impact of a change in a single factor is shown with other assumptions left unchanged for each of the risk types.

Risk	Risk methods and assumptions used in preparing the sensitivity analysis
Underwriting risk	The impact of an increase in net loss ratios for general insurance business by 5%.
Currency risk	The impact of a change in foreign exchange rates by ± 10%.
Interest rate risk	The impact of a change in the yield curve on the company's fixed interest portfolio by 100 basis points and negative 25 basis points. The stress excludes the impact of the change in cashflows from floating rate notes.
	The underlying yield curve is based on prevailing swap rates as at year end 2017.
Equity risk	The impact of a change in equity market values by ±10%.

These sensitivity factors have the following impacts on profit before tax and equity:

Sensitivity analysis		2017	2016
Impact on profit before tax		€′000	€′000
Underwriting risk	5.00%	(5,735)	(4,994)
Currency risk	10.00%	2,926	1,744
Currency risk	-10.00%	(2,926)	(1,744)
Interest rate risk	1.00%	(20,579)	(23,162)
Interest rate risk	-0.25%	5,846	5,033
Equity risk	10.00%	22,124	23,247
Equity risk	-10.00%	(22,124)	(23,247)
Sensitivity analysis		2017	2016
Impact on equity		€′000	€′000
Underwriting risk	5.00%	(5,018)	(4,370)
Currency risk	10.00%	2,560	1,526
Currency risk	-10.00%	(2,560)	(1,526)
Interest rates	1.00%	(18,007)	(20,267)
Interest rates	-0.25%	5,115	4,404
Equity risk	10.00%	19,358	20,341
Equity risk	-10.00%	(19,358)	(20,341)

During the year, the material risks of the business were also subject to a wide range of stress and scenario tests in order to provide an adequate basis for the assessment of the overall solvency needs of the company over its business planning horizon. Stress and scenario testing and related analysis were conducted in line with the ORSA Policy and the results of the tests contained in the Risk Report as well as the full ORSA report which was submitted to the Central Bank in December 2017. The identified stresses and scenarios were decided upon based on a number of discussions with the Board, Risk Committee and the relevant function manager.

Some of the instantaneous stresses carried out as part of the ORSA are presented in the table below. The ORSA process was carried out on Q2 2017 data, however, the absolute reduction in the SCR Coverage Ratio under each scenario would not be materially different if repeated on Q4 2017 data.

The company remains well capitalised in these extreme scenarios and there is no requirement for material management actions for the company to avoid breaching the SCR.

#### Non-Life Risk Scenario

Description	Q2 2017 SCR Coverage	Stressed SCR Coverage	Absolute Reduction in SCR Coverage
Severe Deterioration in Claims Environment	333%	268%	-65%

#### Market Risk Scenario

Description	Q2 2017 SCR Coverage	Stressed SCR Coverage	Absolute Reduction in SCR Coverage
Investment Market Collapse	333%	286%	-47%
investment warker conapse	33370	20070	-4770

#### **Default Risk Scenario**

Description	Q2 2017 SCR Coverage	Stressed SCR Coverage	Absolute Reduction in SCR Coverage
Credit event impacting reinsurers and corporate bond holdings	333%	300%	-33%

A description of each scenario is included below. The instantaneous impact is estimated by considering both the P&L impact of the scenario in conjunction with projected movements in the SCR.

**Severe Deterioration in Claims Environment** - Current claims reserves run off at the upper end of the range of reasonable best estimate projections. The company suffers several extreme property losses with gross cost of €123m and aggregation of liability claims with gross cost of €40m.

**Investment Market Collapse** - 10% fall in property market, 25% fall in equity markets, uniform 2% rise across the yield curve and a 50% default on Irish Sovereign Debt.

**Credit event impact reinsurers and corporate bond holdings** - 100% default of largest single reinsurer, 3 notch downgrade of all rated counterparties, 100% default of largest sub investment grade holding.

#### C.8 Dependencies between risk modules

Risk categories and specific risks are correlated to each other to a greater or lesser extent. Risks are correlated where an unfavourable outcome in one risk tends to be accompanied by an unfavourable outcome in another risk. For example, equity risk and property risk are correlated in the sense that a fall in property values can often be accompanied by a fall in equity values.

Risks have little correlation where it is unlikely that both risks will experience an unfavourable outcome at the same time. Such risks are said to be largely uncorrelated or independent.

The result is a 'diversification benefit'. For example, lapse risk may be somewhat independent of premium risk as lapse rates are unlikely to increase when premium rates are inadequate.

As the same capital resources are used to manage many different sources of risk, it is necessary to manage risk as a portfolio. An isolated change in risk in one part of a portfolio will also influence the capital required to finance other risks due to correlations. Consequently, it is necessary to explicitly model the correlations between risks. The quantification of correlations is highly uncertain and the capital model relies on the 'dependency structure' defined in the Solvency II Standard Formula Technical Specification.

The company's Risk Report includes quantification of the diversification benefits assumed in the capital model and the appropriateness of this is tested on an annual basis as part of the ORSA process.

## C.9 Any other information

The company does not use any special purpose vehicles (SPV) to transfer any of its risks.

## D: Valuation for Solvency Purposes

## D.1 Assets

The following table analyses the valuation of the company's assets as at 31 December 2017 and the prior year for both Solvency II purposes and financial statements purposes:

#### As at 31 December 2017

Ref	Asset Category	Solvency II €'000	Financial statements €'000	Difference €'000
1	Intangible Asset	0	475	(475)
2	Deferred Tax Asset	0	146	(146)
3	Property, plant and equipment (PPE)	0	515	(515)
4	Investment Properties	92,752	92,750	2
5	Listed Equities	186,215	170,807	15,408
6	Unlisted Equities	4,464	4,464	0
7	Government Bonds	646,868	642,655	4,213
8	Corporate Bonds	104,909	128,878	(23,969)
9	Collateralised Securities	2,590	0	2,590
10	Collective Investment Undertakings	53,620	45,964	7,656
11	Derivatives	91,382	531	90,851
12	Deposits	28,972	10,035	18,937

13	Loans to local authorities	20,429	20,429	0
14	Reinsurance Recoverable	25,047	32,484	(7,437)
15	Insurance Receivables	20,159	44,125	(23,966)
16	Reinsurance Receivables	4,569	4,569	0
17	Trade Receivables	5,270	5,449	(179)
18	Cash & Cash Equivalents	104,227	123,169	(18,942)
19	Other	0	6,765	(6,765)
	Total Assets	1,391,473	1,334,210	57,263

## As at 31 December 2016

Ref	Asset Category	Solvency II €'000	Financial statements €'000	Difference €'000
1	Intangible Asset	0	566	(566)
2	Deferred Tax Asset	0	142	(142)
3	Property, plant and equipment (PPE)	0	816	(816)
4	Investment Properties	92,739	92,575	164
5	Listed Equities	195,251	181,220	14,031
6	Unlisted Equities	3,265	3,263	2
7	Government Bonds	621,689	617,173	4,516
8	Corporate Bonds	93,809	117,820	(24,011)
9	Collateralised Securities	3,068	0	3,068
10	Collective Investment Undertakings	55,808	47,985	7,823
11	Derivatives	113,372	757	112,615

	Total Assets	1,384,825	1,317,479	67,346
19	Other	0	7,540	(7,540)
18	Cash & Cash Equivalents	44,061	125,980	(81,919)
17	Trade Receivables	7,074	7,365	(291)
16	Reinsurance Receivables	1,804	1,804	0
15	Insurance Receivables	10,689	42,708	(32,019)
14	Reinsurance Recoverable	36,826	46,313	(9,487)
13	Loans to local authorities	23,452	23,452	0
12	Deposits	81,918	0	81,918

## Description of the basis, methods and assumptions used for valuation:

Ref	Asset Category	Solvency II	Financial statements
1	Intangible Asset	The company's intangible assets comprise of IT software which does not meet the criteria under Solvency II valuation rules, i.e. it cannot be sold separately and there is not a quoted market price in an active market for the same or similar intangible assets.  Therefore, the company's intangible assets are valued at zero under Solvency II.	In the IFRS financial statements the intangible assets are valued at cost less accumulated amortisation and accumulated impairment losses.
2	Deferred Tax Asset	For the company, the difference between the deferred tax asset in the IFRS financial statements and the deferred tax liability created under Solvency II pertains to the deferred tax on the changes in valuation in moving from IFRS to Solvency II. That is, it is largely driven by the reduction in the (net) technical provisions under Solvency II. This would result in an instantaneous profit, which would incur corporation tax at 12.5%.	Deferred tax assets and liabilities are measured at the tax rates that are expected to apply to the period when the asset is realised or the liability is settled, based on the tax rates and tax laws that have been enacted or substantively enacted by the end of the reporting period.
3	Property, plant and	Under Solvency II, the valuation of PPE is based on the core principle in the	In the IFRS financial statements, the company

	equipment (PPE)	directive "assets shall be valued at the amount for which they could be exchanged between knowledgeable willing parties in an arm's length transaction".  As the company's PPE mainly relates to leasehold improvements, it is considered unlikely that these would have any resale value in an arm's length transaction. Therefore, a zero value is considered the most prudent.	uses the cost model to value PPE, i.e. cost less any accumulated depreciation and accumulated impairment losses.
4	Investment properties	Market Valuations are carried out on our investment properties at each year end by the property managing agents using the RICS (Royal Institute of Chartered Surveyors) Valuation – Professional Standards. Every three years a full red book valuation is carried out. On an annual basis desk based valuations are carried out and valuation certificates are issued.  This is consistent with the Solvency II valuation principles. The Solvency II value also includes any accrued rental income, i.e. market value plus accrued income.	The same valuation method is applied to the IFRS financial statements; however, accrued income is not included in the valuation.  Accrued income is shown as a separate line item ("other" as shown in valuation table above) in the financial statements.
5	Listed Equities	Under Solvency II, in accordance with Article 75 of the Directive, assets shall be valued at the amount for which they could be exchanged between knowledgeable willing parties in an arm's length transaction.  The Solvency II Valuation principles are consistent with that of IFRS, however, the Solvency II value also includes accrued income, i.e. market value plus accrued income.  Note: Preference shares are included as equities under Solvency II. Exchange traded funds (ETFs) and collateralised securities are excluded.	Under IFRS, financial assets are measured at fair value through the profit or loss based on quoted (unadjusted) prices in active markets. For financial assets not traded in an active market, the fair value is determined using appropriate valuation methods.  Accrued income is shown as a separate line item ("other" as shown in valuation table above) in the financial statements.

			Dividend withholding tax recoverable is shown as trade receivable under IFRS.
6	Unlisted Equities	Under Solvency II, in accordance with Article 75 of the Directive, assets shall be valued at the amount for which they could be exchanged between knowledgeable willing parties in an arm's length transaction.  The Solvency II Valuation principles are consistent with that of IFRS, however, the Solvency II value also includes accrued income, i.e. market value plus accrued income.	Under IFRS, financial assets are measured at fair value through the profit or loss based on quoted (unadjusted) prices in active markets. For financial assets not traded in an active market, the fair value is determined using appropriate valuation methods.  Accrued income is shown as a separate line item ("other" as shown in valuation table above) in the financial statements.
7	Government Bonds	Under Solvency II, in accordance with Article 75 of the Directive, assets shall be valued at the amount for which they could be exchanged between knowledgeable willing parties in an arm's length transaction.  The Solvency II Valuation principles are consistent with that of IFRS, however, the Solvency II value also includes accrued income, i.e. market value plus accrued income.	Under IFRS, financial assets are measured at fair value through the profit or loss based on quoted (unadjusted) prices in active markets. For financial assets not traded in an active market, the fair value is determined using appropriate valuation methods.  Accrued income is shown as a separate line item ("other" as shown in valuation table above) in the financial statements.
8	Corporate Bonds	Under Solvency II, in accordance with Article 75 of the Directive, assets shall be valued at the amount for which they could be exchanged between knowledgeable willing parties in an arm's length transaction.  The Solvency II Valuation principles are consistent with that of IFRS, however, the	Under IFRS, financial assets are measured at fair value through the profit or loss based on quoted (unadjusted) prices in active markets. For financial assets not traded in an active market, the fair value is determined using

		Solvency II value also includes accrued income, i.e. market value plus accrued income.	appropriate valuation methods.  Accrued income is shown as a separate line item ("other" as shown in valuation table above) in the financial statements.  Note: Preference shares are classified as corporate bonds under IFRS.
9	Collateralised Securities	Under Solvency II, in accordance with Article 75 of the Directive, assets shall be valued at the amount for which they could be exchanged between knowledgeable willing parties in an arm's length transaction.  The Solvency II Valuation principles are consistent with that of IFRS, however, the Solvency II value also includes accrued income, i.e. market value plus accrued income.	Under IFRS, financial assets are measured at fair value through the profit or loss based on quoted (unadjusted) prices in active markets. For financial assets not traded in an active market, the fair value is determined using appropriate valuation methods.  Accrued income is shown as a separate line item ("other" as shown in valuation table above) in the financial statements.  Note: Collateralised securities are classified as equity securities in the IFRS financial statements.
10	Collective Investment Undertakings	Under Solvency II, in accordance with Article 75 of the Directive, assets shall be valued at the amount for which they could be exchanged between knowledgeable willing parties in an arm's length transaction.  The Solvency II Valuation principles are consistent with that of IFRS, however, the Solvency II value also includes accrued income, i.e. market value plus accrued income.	Under IFRS, financial assets are measured at fair value through the profit or loss based on quoted (unadjusted) prices in active markets. For financial assets not traded in an active market, the fair value is determined using appropriate valuation methods.

		Exchange traded funds (ETFs) are included in this category under Solvency II.	Accrued income is shown as a separate line item ("other" as shown in valuation table above) in the financial statements.  Note: ETFs are classified as equity securities in the IFRS financial statements.
11	Derivatives	Under Solvency II, derivative financial instruments are measured at the gross fair value as at the reporting date. The company's derivative financial instruments relate to forward currency contracts. All forward sales are shown as assets and all forward purchases are shown as liabilities.	Under IFRS, derivatives are initially measured at fair value on the date the contract is entered into, and subsequently re-measured at fair value at the reporting date. Each derivative is carried as a financial asset when the fair value is positive and as a financial liability when the fair value is negative.
12	Deposits	Under Solvency II, this relates to deposits other than cash and cash equivalents that cannot be used to make payments until after the fixed term maturity date. All fixed term deposits, regardless of their term, are included here.  Under Solvency II, Article 16 (1) of the Delegated Regulations states that insurance and reinsurance undertakings shall not value financial assets or financial liabilities at cost or amortised cost. Such assets are valued at the amount for which they could be exchanged between knowledgeable willing parties in an arm's length transaction.  Accrued income is also included in the Solvency II value.	Under IFRS, deposits classified as "loans and receivables" relate to deposits with a fixed term of greater than 3 months.  Deposits with a fixed term of 3 months or less are included in "cash and cash equivalents".  Under IFRS "loans and receivables" are subsequently measured at amortised cost using the effective interest rate.  Accrued income is shown as a separate line item ("other" as shown in valuation table above) in the financial statements.
13	Loans to local authorities	Under Solvency II, Article 16 (1) of the Delegated Regulations states that insurance and reinsurance undertakings shall not value financial assets or	Under IFRS, loans to Local Authorities are classified as "loans and receivables" and are subsequently measured

		financial liabilities at cost or amortised cost. Such assets are valued at the amount for which they could be exchanged between knowledgeable willing parties in an arm's length transaction.	at amortised cost using the effective interest rate.  However, as loan repayments fall due at year end, there is no difference between the valuation under Solvency II and under IFRS at year end, despite the basis or method being different.
14	Reinsurance Recoverable	Under Solvency II, the technical reserves are discounted. Additional margins for uncertainty are excluded from the Solvency II technical provisions valuation. Finally, the Solvency II technical provisions valuation includes a risk margin.	In the IFRS financial statements technical reserves are undiscounted. In addition, the claims reserves in the financial statements include additional margins for uncertainty pertaining to loadings for reduction in the discount rate and the introduction of Periodic Payment Orders (PPOs) as well as a loading representing a general provision for changes in the claims environment.
15	Insurance Receivables	Insurance receivables relates to insurance debtors only measured at their carrying value as at the reporting date.  Under Solvency II rules 'provision for recoverable retro premium' is reclassified out of assets to be recognised as a cash inflow offsetting the Best Estimate Technical Provision in liabilities. The valuation of these cash inflows has changed to a discounted basis consistent with the cash outflows and in line with Solvency II valuation principles.	In the IFRS financial statements a provision for premium adjustments for retrospectively rated policies is recognised when provision is made for related losses.  The valuation basis for insurance debtors, on the other hand, is consistent with the Solvency II valuation principles and therefore, no valuation difference arises.
16	Reinsurance Receivables	Insurance receivables relates to reinsurance debtors, measured at their carrying value as at the reporting date.	In the IFRS financial statements, the valuation basis is consistent with the Solvency II valuation

			principles and therefore, no valuation difference arises.
17	Trade Receivables	Trade receivables are measured at their carrying value as at the reporting date.  Dividend withholding tax recoverable is included in the valuation of assets under Solvency II.	Dividend withholding tax recoverable is included as a trade receivable under Solvency II – this is the only valuation difference arising.
18	Cash & Cash Equivalents	Under Solvency II, cash and cash equivalents relates to cash at bank only (i.e. current accounts and call accounts). Accrued income is also included in the Solvency II valuation.	In the IFRS financial statements, cash and cash equivalents include cash at bank (i.e. current and call accounts), together with, deposits with a fixed term of 3 months or less.  Accrued income is shown as a separate line item in the IFRS financial statements.

## Leasing Arrangements

The company's only leasing arrangements relate to its office premises at 1 Grand Canal Square and some office equipment used on a day-to-day operating basis which are leased and are valued at zero in the Solvency II balance sheet.

#### Related Undertakings

The company does not have any holdings in related undertakings or participations.

#### Criteria used to assess whether markets are active

The company assesses if a market is active through reference to Bloomberg and consultation with external stock brokers. If markets are deemed inactive, the quoted price for similar assets in an active market is applied where possible. In other cases, stock brokers provide the company with a price based on market conditions. In instances where companies have gone into liquidation and their shares have been delisted from a stock exchange, the company's Director of Investments took a decision based on market knowledge and experience to write down the value of the shares to a flat level, pending the results of the liquidation process. Other than in this regard, no other estimation uncertainty exists in respect of the valuation of the company's investment assets.

#### D.2 Technical Provisions

The company's business is written on both claims made and losses occurring bases. Where "policy year" is referred to this is taken to be the notification year for claims made business and the accident year for losses occurring business. The following tables summarises the value of technical provisions on both gross and net bases.

#### Value of Technical Provisions

## **Gross Technical Provisions**

Total

#### **IPB Gross Technical Provisions -**€'000s Claims **Premium Total Technical** 2017 Provision **Provision Risk Margin Provisions** 390 475 **Medical Expenses** 52 34 **Income Protection** 1,559 208 134 1,901 Motor Vehicle Liability 14,192 1,386 1,180 16,758 Other Motor 3,548 347 295 4,190 Marine Aviation and Transport 24 280 34 338 Fire / Property 13,550 2,123 741 16,414 **General Liability** 355,200 15,525 26,468 397,193 **Legal Expenses** 1,523 172 129 1,823

19,847

29,004

439,092

390,242

IPB Gross Technical Provisions -				
€'000s				
	Claims	Premium		<b>Total Technical</b>
<b>2016</b>	Provision	Provision	Risk Margin	<b>Provisions</b>
Medical Expenses	271	52	24	347
Income Protection	1,086	207	96	1,388
Motor Vehicle Liability	15,362	1,546	1,129	18,038
Other Motor	3,840	387	282	4,509
Marine Aviation and Transport	127	28	11	167
Fire / Property	13,278	2,332	608	16,218
General Liability	338,358	13,070	23,671	375,099
Legal Expenses	1,744	289	151	2,184
Total	374,066	17,911	25,974	417,951

Gross technical provisions have been valued using standard actuarial methods as described in detail below.

#### **Net Technical Provisions**

IPB Net Technical Provisions - €'000s				
2017	Claims Provision	Premium Provision	Risk Margin	Total Technical Provisions
			•	
Medical Expenses	390	55	34	479
Income Protection	1,559	221	134	1,914
Motor Vehicle Liability	14,178	1,485	1,180	16,843
Other Motor	3,545	371	295	4,211
Marine Aviation and Transport	280	35	24	339
Fire / Property	6,002	3,833	741	10,575
General Liability	335,308	16,069	26,468	377,844
Legal Expenses	1,523	189	129	1,841
Total	362,784	22,258	29,004	414,045

IPB Net Technical Provisions - €'000s				
2016	Claims Provision	Premium Provision	Risk Margin	Total Technical Provisions
Medical Expenses	271	56	24	352
Income Protection	1,086	225	96	1,406
Motor Vehicle Liability	13,797	1,644	1,129	16,571
Other Motor	3,449	411	282	4,143
Marine Aviation and Transport	127	29	11	167
Fire / Property	4,228	4,088	608	8,924
General Liability	310,095	13,577	23,671	347,343
Legal Expenses	1,744	325	151	2,220
Total	334,797	20,355	25,974	381,125

#### Methods used to calculate technical provisions

The company uses a combination of actuarial methods to value technical provisions. The basis of the technical provisions are undiscounted gross reserves. For policy years where no further development is expected, typically the reserves are set equal to the case estimates present in that year. For other policy years where further development is expected, but there is sufficient incurred experience to be credible, chain-ladder methods are used to model the full future path of incurred claims.

For recent policy years there may not be enough incurred data to fully rely on. In this case development methods are weighted in with other methods which place initial estimates of ultimate claims on either loss ratios, or as a cost per unit exposure. Expected amounts are calculated by considering the statistic for

prior years, trended forward allowing for rate movements and claims inflation. Another method considered for recent years is the average cost per claim method – where claim numbers are multiplied by expected average ultimate costs.

The company uses premium and population, where appropriate, as an exposure measures. Typical measures of exposure such as turnover are not deemed to be a good measure of risk in its core business.

Estimates based on paid claims are also calculated, but usually do not form the basis of reserve selections as there is a long delay between claim notification and payment for much of the company's business which is dominated by liability lines.

For most classes, net of reinsurance claims are calculated by considering the average percentage recovered from reinsurance. The company's reinsurance retentions have been stable over time, recovery amounts are a small portion of gross liabilities and previous years provide a good benchmark for the rate of future reinsurance recoveries. The exception to this is Property which has a more extensive reinsurance programme, for which the same methods as described for calculating gross claims are also considered in valuing the net position.

Gross and net claims are discounted by considering the expected payment profile of claims over time, and discounting using risk free yield curves provided by EIOPA.

The risk margin is calculated using a modified Solvency Capital Requirement as specified by EIOPA. This is projected to develop over time in line with best estimate net technical provisions.

The following items defined in the Solvency II legislation are not relevant to the company regarding technical provisions:

- The company does not apply the matching adjustment.
- The company does not use the volatility adjustment.
- The company does not use transitional methods on the risk-free interest rate term structure.
- The company does not apply any transitional deductions.

### Considerations by Line of Business

## Medical Expenses and Income Protection

The company writes Personal Accident business that involves both medical expenses and income protection coverage. Claims cannot be split between those two elements, and so these are modelled in aggregate and then split 80/20 between income protection and medical expenses – an assumption based on historical payment data – three year rolling average.

#### Motor Vehicle Liability and Other Motor

The company does not separately identify liability and damage claims within the motor business written, and so again a high-level assumption is required to split the business into Solvency II lines of business. 80% of motor is assumed to be liability business, and 20% other claims – an assumption based on twelve month rolling data. Legacy business has been removed so that patterns reflect current exposure.

### Marine Aviation and Transport

The company writes only a very small amount of marine business.

## Fire / Property

The company's property account contains a mix of exposures but predominantly covering council buildings and council owned social housing. Due to the higher volume of reinsurance recoveries in this class, methods used to calculate gross reserves are similarly applied in the calculation of net reserves.

#### General Liability

This is by far the company's largest class, and contains a number of different exposures within it. The predominant line is Public Liability, and the valuation of this has been further split by coverage type and type of insured. Employers Liability has been split by coverage type and legacy business removed. The company also writes a small amount of Professional Indemnity, included in this class. All case estimates are now believed to fully represent the change in the discount rate from 3% to 1% for cost of care, and 1.5% loss of earnings exposure so no additional provision is held for a move in the discount rate. There is a provision within the best estimate for the pending introduction of PPOs.

#### Legal Expenses

The company writes some Criminal Defence policies which are mainly valued using loss ratio methods as limited experience exists.

#### Other Items

Claims handling expenses have been estimated as a percentage of future reserves by considering the historic ratio of claims handling expenses to claims payments.

A portion of the company's business is retro rated policies — with minimum and deposit premiums paid up front, followed by further premiums payable if claim payments exceed a set threshold. The future value of this asset has been approximated by modelling expected claim amounts for each relevant policy, and the resulting retro premiums that would be triggered calculated.

Provisions relating to unearned premiums have been calculated by considering expected loss ratios by line of business, and applying those to unearned premiums.

## Description of the level of uncertainty

The classes of business written by the company give rise to a significant degree of uncertainty concerning the ultimate cost of claims. Uncertainty arises for the following reasons in respect of the majority of policies written by the company:

- Whether an event has occurred that would give rise to a policyholder suffering an insured loss.
- The extent of policy coverage and limits applicable.
- The amount of insured loss suffered by the policyholder.
- The timing of a settlement to the policyholder.
- The costs associated with handling claims.

Estimates have to be made both for the expected cost of claims reported at the reporting date and for the expected ultimate cost of claims incurred but not yet reported (IBNR) at the reporting date. It can take a significant period of time before the ultimate claims cost can be determined with certainty.

The company uses estimation techniques, based on statistical analysis of past experience and future estimates, to calculate a range of estimated cost of claims outstanding at the reporting date, which is subjected to sensitivity analysis. These techniques take into account the characteristics of the company's business.

The company makes assumptions on a number of economic and non-economic factors in the calculation of technical provisions. Some of these assumptions are explicit while others are implicitly made when projecting ultimate claims costs. Significant sources of economic uncertainty include:

- Changes in the level of claims inflation Many of the methods used to estimate technical
  provisions implicitly assume future inflation follows historical inflation. In this case, and in
  methods where there is an explicit inflation assumption, there is a risk that actual inflation
  deviates from the assumed level. The actual level of claims inflation will depend on factors such
  as changes in the court award environment and increases in fraudulent or exaggerated claims
  activity. The level of future claims inflation is likely the most significant uncertainty affecting the
  calculation of technical provisions.
- Potential future changes in the discount rate Technical provisions are currently valued based on
  the current discount rate environment of 1% for cost of care and 1.5% for loss of future earnings.
  Any future reduction in the discount rate would increase costs. The excess of loss reinsurance
  treaty in place on the liability line would limit the net impact of any future change, however this
  would then be reflected in future reinsurance premiums.

There are also non-economic factors which impact the Technical Provisions, these include:

- Changes in claims development pattern Methods underlying the calculation of technical
  provisions project future claim development based on historical development. Potential changes
  in this claim development is a significant source of uncertainty. This is somewhat linked to the
  level of claims inflation, however there are non-economic factors such as changes in internal
  process or changes in mix of business which could affect future development.
- Introduction of PPO's the introduction of PPO's is relatively certain at this point with the bill having passed all stages of the Oireachtas and IPB currently hold an explicit reserve to cover the expected cost. There is uncertainty around the assumptions underlying this reserve, and in particular the propensity for PPO's to be awarded.
- Emergence of latent claims There is a potential for the emergence of a new type of claim which is currently not present in company data. Due to the nature of its business the company is exposed to aggregations of claims as the business is concentrated by policyholder type, geographical locations, risk exposures and other factors.

#### Valuation basis, method and assumption differences used for IFRS financial statements

For all lines of business the best estimate undiscounted IFRS reserves form the basis of the Solvency II technical provisions. These are then discounted as per Solvency II valuation guidelines.

The main difference to the IFRS financial statements is the inclusion of margins for uncertainty within the IFRS financial statements. An 18% margin is applied to all components of the claims reserve. Furthermore, the retro-rated premium asset is reduced by 18%, recognising the uncertainty in that asset also.

Under Solvency II regulation a risk margin is held in addition to the best estimate liabilities. The €26.1 million risk margin is calculated using the cost of capital approach specified in the regulation.

The financial statements also include a provision of €0.3 million (plus margins and ULAE) in respect of the MIBI levy for the year within the insurance reserves. Under Solvency II MIBI provisions are excluded from the technical provisions, and instead included within "Other Liabilities".

The retro-rated premium asset is included as a credit within the best estimate technical provisions under Solvency II, where it is a separate insurance asset in the IFRS financial statements. The retro-rated premium asset estimate included in the Solvency II Technical Provisions is a best estimate actuarial figure, where the asset in the IFRS financial statements is reduced by a margin for uncertainty of 18%.

The following table provides a reconciliation between the technical provisions as per the IFRS financial statements and the technical provisions for Solvency II purposes as at 31 December 2017.

2017 Reserves in IFRS Accounts	Gross of Reinsurance €'000s 525,365	Net of Reinsurance €'000s 492,881
Exclude MIBI & margins Reserves excluding MIBI	(373) 524,991	(373) 492,507
Exclude UPR Add Undiscounted Premium Provision (excluding retro premium)	(22,042) 21,169	(22,042) 23,572
Exclude Margin for Uncertainty Total Undiscounted Reserves	(80,083) 444,035	(75,128) 418,909
Discounting Discounted Best Estimate Provisions	(3,439) 440,596	(3,360) 415,549
Retro Asset Technical Provisions Excluding Risk Margin	(30,507) 410,088	(30,507) 385,042
Risk Margin Total Technical Provisions	29,004 <b>439,092</b>	29,004 <b>414,045</b>

2016	Gross of Reinsurance €'000s	Net of Reinsurance €'000s
Reserves in IFRS Accounts	511,504	465,191
Exclude MIBI & margins Reserves excluding MIBI	<mark>(996)</mark> 510,508	<mark>(996)</mark> 464,195
Exclude Margin for Uncertainty Total Undiscounted Reserves	(77,874) 432,634	(70,809) 393,386
Reinsurance on Unearned Premium Total with Reinsurance		2,440 395,826
Discounting Discounted Best Estimate Provisions	(630) 432,004	(648) 395,178
Retro Asset Technical Provisions Excluding Risk Margin	(40,027) 391,977	(40,027) 355,151
Risk Margin  Total Technical Provisions	25,974 <b>417,951</b>	25,974 <b>381,125</b>

Refer to Appendix 3 for the S.17.01.02 Non-Life Technical Provisions Template.

The increase in Technical Provisions can be attributed to a number of factors. There is a large increase in the Net Best Estimate Claims Provisions for the General Liability segment. This is due to ground-up conversions undertaken in 2017 along with the elimination of historical retro-balances. There is also an increase in the Premium Provisions due to the increased written premium in 2017. Finally, there was an increase in the Risk Margin due to an increase in the company's Non-Life Risk SCR.

## D.3 Other Liabilities

The following table analyses the valuation of the company's other liabilities as at 31 December 2017 for both Solvency II purposes and financial statements purposes:

As at 31 December 2017

Ref	Liability Category	Solvency II €'000	Financial statements €'000	Difference €'000
1	Provisions other than technical provisions	300	300	0
2	Deferred Tax Liabilities	6,386	0	6,386
3	Derivatives	91,352	501	90,851
4	Insurance Payables	2,385	2,385	0
5	Reinsurance Payables	917	917	0

6	Trade Payables	0	0	0
7	Any other liabilities	91,102	90,824	278
	Total other liabilities	192,442	94,927	97,271

## As at 31 December 2016

Ref	Liability Category	Solvency II €'000	Financial statements €'000	Difference €'000
1	Provisions other than technical provisions	800	800	0
2	Deferred Tax Liabilities	5,811	0	5,811
3	Derivatives	114,234	1,619	112,615
4	Insurance Payables	1,809	1,809	0
5	Reinsurance Payables	1,297	1,297	0
6	Trade Payables	54	54	0
7	Any other liabilities	9,624	9,624	0
	Total other liabilities	133,629	15,203	118,426

## Description of the basis, methods and assumptions used for valuation:

Ref	Liability Category	Solvency II	Financial statements
1	Provisions other than technical provisions	Other provisions relate to the company's share of potential provisions of the Motor Insurers' Bureau of Ireland, measured at its carrying value at the reporting date.	In the IFRS financial statements, the valuation basis is consistent with the Solvency II valuation principles and therefore, no valuation difference arises.

2	Deferred Tax Liabilities	For the company, the difference between the deferred tax asset in the IFRS financial statements and the deferred tax liability created under Solvency II pertains to the deferred tax on the changes in valuation in moving from IFRS to Solvency II. That is, it is largely driven by the reduction in the (net) technical provisions under Solvency II. This would result in an instantaneous profit, which would incur corporation tax at 12.5%.	A deferred tax asset as opposed to a deferred tax liability is shown in the IFRS financial statements as described above in the asset category section.
3	Derivatives	Under Solvency II, derivative financial instruments are measured at the gross fair value as at the reporting date. The company's derivative financial instruments mainly relate to forward currency contracts. All forward sales are shown as assets and all forward purchases are shown as liabilities.	Under IFRS, derivatives are initially measured at fair value on the date the contract is entered into, and subsequently re-measured at fair value at the reporting date. Each derivative is carried as a financial asset when the fair value is positive and as a financial liability when the fair value is negative.
4	Insurance Payables	Insurance payables relates to insurance creditors, measured at their carrying value as at the reporting date.	In the IFRS financial statements, the valuation basis is consistent with the Solvency II valuation principles and therefore, no valuation difference arises.
5	Reinsurance Payables	Insurance payables relates to reinsurance	In the IFRS financial statements, the

		creditors, measured at their carrying value as at the reporting date.	valuation basis is consistent with the Solvency II valuation principles and therefore, no valuation difference arises.
6	Trade Payables	Trade payables are measured at their carrying value as at the reporting date.	In the IFRS financial statements, the valuation basis is consistent with the Solvency II valuation principles and therefore, no valuation difference arises.
7	Any other liabilities	Other liabilities are measured at their carrying value as at the reporting date.	In the IFRS financial statements, the valuation basis is consistent with the Solvency II valuation principles and therefore, no valuation difference arises.

Refer to Appendix 4 for the S.02.01.02 Solvency II Balance Sheet Template.

Overall, the decrease in the excess of assets over liabilities in 2017 compared to 2016 can be mostly attributed to the inclusion of a portion of the Members' retained earnings distribution in liabilities.

## **Leasing Arrangements**

The company does not have any material liabilities arising from leasing arrangements.

## Material Contingent Liabilities

The company does not have any other material contingent liabilities and provisions other than technical provisions.

## **Employee Benefits**

The company had the following employee benefit obligations as at 31 December 2017:

	2017	2016
	€′000	€′000
Salaries Payable	2,252	1,336
Trade Union Subscriptions Payable	1	2

Pension Payable	3	95
Social Committee Fund	6	9
Holiday Pay Accrual	214	284
Total short-term employee benefit obligations	2,476	1,726

The company does not have any defined benefit plans and contributes only to defined contribution pension schemes.

#### D.4 Alternative Methods for Valuation

The company uses alternative valuation methods in accordance with Article 10 (5) when valuing a small portion of its investment assets. These alternative valuation methods include the following:

- Quoted prices for identical or similar assets or liabilities in markets that are not active —
   This method is applied to assets which have a quoted price but the asset is illiquid and does not trade often. The company can support the rationale for this valuation approach as the quoted prices applied are for assets with similar characteristics, for example, same instrument type, same credit rating and same ultimate guarantor.
- Market- corroborated inputs, which may not be directly observable, but are based on or supported by observable market data This method is applied to assets such as our investment properties and real estate funds.

Market valuations are carried out each year on our investment properties by the property managing agents using the RICS (Royal Institute of Chartered Surveyors) Valuation — Professional Standards. Every three years a full red book valuation is carried out on each property. On an annual basis desk-based valuations are carried out and valuation certificates are issued. The company can justify this valuation approach as it is independent and supported by observable market data.

With regards to our real estate funds, the fund managers carry out a desk-based valuation on a monthly basis. Again, the company can justify this valuation approach as it is independent and supported by observable market data.

Unobservable inputs reflecting the assumptions that market participants would use
when pricing the asset or liability, including assumptions about risk — This method is
applied in cases where securities are in liquidation or carried at amortised cost.

The company assesses the adequacy of the use of the above methods on an annual basis through discussions with our investment custodian and external audit review.

## E: Capital Management

## E.1 Own Funds

The company has a simple capital structure made up of retained earnings only. As at 31 December 2017, the company's eligible amount of own funds to cover the SCR and MCR stood at €744.9 million (2016: €808.2 million) and was comprised entirely of Tier 1 Basic Own Funds. The company manages its capital requirements according to the Capital Management Policy and by assessing its required solvency margins on a regular basis. The Board of Directors reviews the capital structure of the company on an on-going basis to determine the appropriate level of capital required to pursue the business strategy.

The company uses the Solvency II Standard Formula to quantify risk in the business and its appropriateness is regularly assessed. The Standard Formula is also used to quantify the capital impact of key events and key management actions. It is also used to analyse the change in risk profile from one quarter to the next. The company assesses the significance with which the risk profile deviates from the key assumptions and parameters underlying the SCR. Conceptually, the company estimates Economic Capital from:

- Regulatory Capital
- An allowance for deviations from Regulatory Capital
- A consideration of non-quantified risks

The assessment of Economic Capital also considers:

- Suitable margins above the SCR, as might be required by a target credit rating
- Required capital for possible strategic initiatives
- Resilience against certain stress scenarios
- Recognition of the mutual status of the company and the challenges for capital raising

The company's capital levels are consistent with the highest credit rating agency financial strength levels. The company has developed risk metrics to quantify the risks to which the business is exposed. A capital model is used to quantify the risks of the business taking into account diversification effects. This is done in the context of the company's Own Risk and Solvency Assessment ("ORSA"), which continues to evolve in parallel with the changing environment and industry best practice. The appropriateness of the capital model is regularly assessed. The company considers overall solvency needs including risks that are beyond the scope of the capital model. This is achieved using a range of sensitivity tests and scenario analysis which are undertaken on an annual basis and are assumed to apply over the business planning period of 3 years.

The material risks of the business are subject to a wide range of stress tests in order to provide an adequate basis for the assessment of the overall solvency needs. Stress testing and related analysis are conducted in line with the ORSA Policy and the results of stress tests are contained in the Risk Report. The identified stresses are decided upon based on discussion with the relevant function manager. The company considers capital requirements and capital efficiency in the context of profitability, expenses and market position relative to peers.

The following table reconciles the difference (reconciliation reserve) between the equity in the financial statements and the basic own funds as calculated for Solvency II Purposes.

	2017	2016
	€′000	€′000
Total equity in the financial statements	714,217	791,572
Items not recognised in the financial statements		
Best estimate claims provisions	(362,784)	(334,797)
Best estimate premium provisions	(22,258)	(20,355)
Risk margin	(29,004)	(25,974)
Foreseeable distribution	(15,301)	(25,000)
Deferred tax impact	(6,566)	(5,953)
Items not recognised in the Solvency II Balance Sheet		
IFRS claims reserves	372,674	352,014
Unearned premium reserves	22,042	19,100
ULAE	22,062	21,603
Bad debt	618	712
Claims margin of uncertainty	75,185	70,961
Inclusion of retro premium as a future cashflow	(25,016)	(34,258)
Asset valuation differences	(990)	(1,380)
Basic Own Funds under Solvency II	744,879	808,245

None of the company's own funds are subject to transitional arrangements. The company has no ancillary own funds or subordinate debt. No deductions are applied to own funds and there are no material restrictions affecting their availability and transferability

The following table provides explanations of the key elements of the reconciliation reserve shown above.

Key element of the reconciliation reserve	Explanation
Risk Margin	The risk margin is designed to ensure that the
	value of technical provisions is sufficient for
	another insurer to take over and meet the
	insurance obligations. It is calculated using a
	modified Solvency Capital Requirement as
	specified by EIOPA.
Foreseeable Distributions	The foreseeable distribution relates to a Member
	dividend due to be paid during 2018.
Deferred Tax Liability	For the company, the difference between the
	deferred tax asset in the IFRS financial statements
	and the deferred tax liability created under
	Solvency II pertains to the deferred tax on the
	changes in valuation in moving from IFRS to
	Solvency II. That is, it is largely driven by the
	reduction in the (net) technical provisions under
	Solvency II. This would result in an instantaneous

	profit, which would incur corporation tax at 12.5%.
Unearned Premium Reserves / Best Estimate Premium Provisions	Under IFRS, the company is required to hold a reserve for unearned exposure that is at least equal to the unearned premium. Under Solvency II the best estimate premium provisions is a discounted best estimate. This best estimate includes an allowance for future reinsurance premium and recoveries as Solvency II requires reinsurance to be recognised consistently with the boundary of the underlying insurance contract whereas IFRS recognises reinsurance from inception of the contract.
Differences between IFRS liabilities and best estimate liabilities	In the IFRS financial statements technical reserves are undiscounted, as compared with discounted Solvency II technical provisions.
Claims Margin of Uncertainty	Margins of uncertainty are included in the IFRS financial statements. An 18% margin is applied to all components of the claims reserves. Further the retro asset is reduced by 18%, recognising the associated uncertainty. These margins of uncertainty are excluded from Solvency II technical provisions.
Asset Valuation Differences	Valuation differences relate to Property, Plant and Equipment (PPE) and Intangible Asset, both of which are valued at cost less accumulated depreciation in the IFRS financial statements. The company's PPE relates to leasehold improvements and its intangible asset relates to IT software. As neither can be sold separately, both are valued at zero under Solvency II valuation principles. Provisions for MIBI are included in the IFRS claims reserves but are included in "other provisions" under the Solvency II balance sheet. Retro-rated premium is held as under Insurance Receivables in the IFRS balance sheet but is included in the Solvency II Technical Provisions as future cash inflow.

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

As at 31 December 2017, the company had a solvency ratio of 3.4 times the SCR (2016: 3.9 times). The company's SCR and MCR were €216.4 million and €54.1 million respectively (2016: €207.2 million and €51.8 million respectively).

The following table shows the components of the SCR (using the Standard Formula) as at 31 December 2017.

	€′000	€′000
	2017	2016
Market Risk analysed by the following sub-risk modules:	135,432	136,551
Concentration Risk	13,134	16,978
Interest-Rate Risk	20,579	23,180
Currency Risk	4,876	4,201
Equity Risk	90,828	87,709
Property Risk	23,188	23,185
Spread Risk	28,600	32,891
Market Diversification Benefit	(45,773)	(51,593)
Non-Life Risk analysed by the following sub-risk modules:	137,100	126,832
Premium and Reserve Risk	135,251	124,929
Lapse Risk	0,000	0,000
Catastrophe Risk	6,769	6,904
Non-Life Diversification Benefit	(4,920)	(5,001)
<b>Default Risk</b> analysed by the following sub-risk modules:	21,085	17,001
Type 1	14,301	9,187
Type 2	8,118	8,988
Default Diversification Benefit	(1,334)	(1,174)
Health Risk analysed by the following sub-risk modules:	1,243	1,019
Premium and Reserve Risk	0,982	0,756
Lapse Risk	0,000	0,000
Catastrophe Risk	0,555	0,520
Health Diversification Benefit	(0,294)	(0,257)
Basic Solvency Requirements ("BSCR") pre- Diversification	294,860	281,403

Overall Diversification Benefit	(68,400)	(64,431)
BSCR	226,460	216,972
Operational Risk	12,303	11,759
Loss Absorbing Capacity of Deferred Tax	(22,384)	(21,517)
SCR	216,378	207,215
MCR	54,095	51,804

The company uses EIOPA's Solvency II Standard Formula. It does not use company-specific parameters in its computation, however, it uses one simplification in relation to the allocation of risk mitigation from the non-life and health modules across our reinsurer panel in the default type 1 calculation.

The company applies the loss absorption mechanism in the Standard Formula calculation in relation to future deferred taxes. During the year, the company went through an internal governance process to estimate the impact of future deferred tax benefits with reference to its own future capital funding. A decision was taken to reduce the benefit of the loss absorbing capacity of deferred tax in the SCR calculation to 75%.

As stated above, the Minimum Capital Requirement for the company at 31 December 2017 was €54.1 million (2016: €51.8 million) which represents the minimum calculated as per the Standard Formula.

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

The company has not opted to use the duration-based equity risk sub-module of the Solvency II regulations.

### E.4 Internal model information

The company applies the standard formula model and does not use an internal model to calculate the Solvency Capital Requirement.

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

There was no breach of the Solvency Capital Requirement (and hence the Minimum Capital Requirement) over the reporting period.

#### E.6 Any other information

Refer to the appendices for the templates as at 31 December 2017, relevant to this section. These include:

- Appendix 5 S.023.01.01 Own Funds Template
- Appendix 6 S.25.01.21 Solvency Capital Requirement Standard Formula Only Template
- Appendix 7 S.28.01.01 Minimum Capital Requirement Only Life or Only Non-Life Template

The increase in the company's total SCR and MCR can be mostly attributed to an increase in the company's Non-Life Risk SCR due to the company's growing book of business. The main driver of the movement in

the company's own funds relates to phase 1 of the company's retained earnings distribution to Members, offset by the 2017 Solvency II profit.

## Annex

# Annual Quantitative Reporting Templates (QRTs)

Appendix 1A: S.05.01.02 Premiums, claims and expenses by line of business for the year-ended 31 December 2017

		Line of Busi	ness for: no	n-life insurance	and reinsu	rance oblig	gations (dir	ect busine	s and acce	epted prop	ortional reir	surance)		Line of b	usiness for	: accepted	d non-prop	
		Medical expense insurance (1)	Income protection insurance (2)	Workers' compensation insurance (3)	Motor vehicle liability insurance (4)	Other motor insurance (5)	Marine, aviation and transport insurance (6)	Fire and other damage to property insurance (7)	liability insurance (8)	Credit and suretyship insurance (9)	Legal expenses insurance (10)	Assistance (11)	Miscellaneou s financial loss (12)	Health (13)	Casualty (15)	Marine, aviation, transport (16)	` '	Total
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0200
Premiums written		€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s
Gross Direct business	R0110	418	1,674	0	7,398	1,849	399	26,339	101,302	0	1,716	0	0					141,095
Gross Proportional reinsurance accepted	R0120	0	0	0	0	0	0	0	0	0	0	0	0	_				0
Gross Non-proportional reinsurance accepted	R0130													0	0	0	0	0
Reinsurers' share	R0140	29	116	0	497	124	0	15,999	6,066	0	100	0	0	0	0	0	0	22,930
Net	R0200	390	1,558	0	6,900	1,725	399	10,340	95,236	0	1,616	0	0	0	0	0	0	118,165
Premiums earned																		
Gross Direct business	R0210	407	1,629	0	7,250	1,812	356	23,681	100,821	0	1,668	0	0					137,624
Gross Proportional reinsurance accepted	R0220	0	0	0	0	0	0	0	0	0	0	0	0					0
Gross Non-proportional reinsurance accepted	R0230													0	0	0	0	0
Reinsurers' share	R0240	29	116	0	497	124	0	15,999	6,066	0	100	0	0	0	0	0	0	22,930
Net	R0300	378	1,513	0	6,752	1,688	356	7,683	94,755	0	1,569	0	0	0	0	0	0	114,694
Claims incurred																		
Gross Direct business	R0310	268	1,071	0	1,919	480	162	2,079	46,392	0	0	0	0					52,371
Gross Proportional reinsurance accepted	R0320	0	0	0	0	0	0	0	0	0	0	0	0					0
Gross Non-proportional reinsurance accepted	R0330													0	0	0	0	0
Reinsurers' share	R0340	0	0	0	-263	-66	0	-3,828	-5,182	0	0	0	0	0	0	0	0	-9,338
Net	R0400	268	1,071	0	2,182	546	162	5,906	51,574	0	0	0	0	0	0	0	0	61,709
Changes in other technical provisions																		
Gross Direct business	R0410	0	0	0	0	0	0	0	0	0	0	0	0					0.0
Gross Proportional reinsurance accepted	R0420	0	0	0	0	0	0	0	0	0	0	0	0					0.0
Gross Non-proportional reinsurance accepted	R0430													0.0	0.0	0.0	0.0	0.0
Reinsurers' share	R0440	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Net	R0500	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Expenses incurred	R0550	86	345	0	2,933	733	102	5,424	49,726	0	226	0	0	0	0	0	0	59,577
Other expenses	R1200														_			0
Total expenses	R1300																	59,577

## Appendix 1A Continued

# S.05.01.02 Premiums, claims and expenses by line of business for the year-ended 31 December 2016

		Line of Bus	iness for: nor	n-life insurance	and reinsur	ance obligati	ons (direct b	usiness and	accepted p	roportional r	einsurance)			Line of bus	siness for : ac	cepted non	-proportion	1
		Medical expense insurance (1)	Income protection insurance (2)	Workers' compensation insurance (3)	Motor vehicle liability insurance (4)	Other motor insurance (5)	Marine, aviation and transport insurance (6)	Fire and other damage to property insurance (7)	General liability insurance (8)	Credit and suretyship insurance (9)	Legal expenses insurance (10)	Assistance (11)	Miscellaneous financial loss (12)	Health (13)	Casualty (15)	Marine, aviation, transport (16)	Property (14)	Total
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0200
Premiums written		€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s
Gross Direct business	R0110	404	1,614	0	6,191	1,548	336	25,115	87,847	0	1,818	0	0					124,872
Gross Proportional reinsurance accepted	R0120	0	0	0	0	0	0	0	0	0	0	0	0					0
Gross Non-proportional reinsurance accepted	R0130													0	0	0	0	0
Reinsurers' share	R0140	36	143	0	459	115	0	14,766	5,518	0	128	0	0	0	0	0	0	21,166
Net	R0200	368	1,471	0	5,732	1,433	336	10,349	82,329	0	1,689	0	0	0	0	0	0	103,707
Premiums earned																		
Gross Direct business	R0210	398	1,590	0	5,899	1,475	372	27,057	81,960	0	2,292	0	0					121,043
Gross Proportional reinsurance accepted	R0220	0	0	0	0	0	0	0	0	0	0	0	0					0
Gross Non-proportional reinsurance accepted	R0230													0	0	0	0	0
Reinsurers' share	R0240	36	143	0	459	115	0	14,766	5,518	0	128	0	0	0	0	0	0	21,166
Net	R0300	362	1,447	0	5,440	1,360	372	12,291	76,442	0	2,164	0	0	0	0	0	0	99,877
Claims incurred																		
Gross Direct business	R0310	141	563	0	7,612	1,903	-124	5,144	42,508	0	0	0	0					57,746
Gross Proportional reinsurance accepted	R0320	0	0	0	0	0	0	0	0	0	0	0	0					0
Gross Non-proportional reinsurance accepted	R0330													0	0	0	0	0
Reinsurers' share	R0340	0	0	0	-468	-117	0	3,772	210	0	0	0	0	0	0	0	0	3,396
Net	R0400	141	563	0	8,081	2,020	-124	1,372	42,298	0	0	0	0	0	0	0	0	54,350
Changes in other technical provisions																		<u> </u>
Gross Direct business	R0410	0	0	0	0	0	0	0	0	0	0	0	0					0
Gross Proportional reinsurance accepted	R0420	0	0	0	0	0	0	0	0	0	0	0	0					0
Gross Non-proportional reinsurance accepted	R0430													0	0	0	0	0
Reinsurers' share	R0440	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Net	R0500	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Expenses incurred	R0550	95	380	0	2,343	586	40	4,553	46,072	0	1,253	0	0	0	0	0	0	55,321
Other expenses	R1200																	270
Total expenses	R1300																	55,591

Appendix 1B: S.05.02.01 Premiums, claims and expenses by country for the year-ended 31 December 2017

								I
		Home Country	Top 5 countrie	es (by amount	of gross premi	ums written - n	on-life obligations)	Total Top 5 and home country
		C0010	C0020	C0030	C0040	C0050	C0060	C0070
	R0010		FR	IT	IE	GB	CA	
		C0080	C0090	C0100	C110	C0120	C0130	C0140
Premiums written		€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s
Gross Direct business	R0110	139,272	0	0	0	1,823	0	141,095
Gross Proportional reinsurance accepted	R0120	0	0	0	0	0	0	0
Gross Non-proportional reinsurance accepted	R0130	0	0	0	0	0	0	0
Reinsurers' share	R0140	22,813	0	0	0	117	0	22,930
Net	R0200	116,459	0	0	0	1,706	0	118,165
Premiums earned								
Gross Direct business	R0210	135,818	0	0	0	1,806	0	137,624
Gross Proportional reinsurance accepted	R0220	0	0	0	0	0	0	0
Gross Non-proportional reinsurance accepted	R0230	0	0	0	0	0	0	0
Reinsurers' share	R0240	22,817	0	0	0	113	0	22,930
Net	R0300	113,001	0	0	0	1,693	0	114,694
Claims incurred								
Gross Direct business	R0310	51,428	0	0	0	943	0	52,371
Gross Proportional reinsurance accepted	R0320	0	0	0	0	0	0	0
Gross Non-proportional reinsurance accepted	R0330	0	0	0	0	0	0	0
Reinsurers' share	R0340	-9,271	0	0	0	-67	0	-9,338
Net	R0400	60,699	0	0	0	1,010	0	61,709
Changes in other technical provisions								
Gross Direct business	R0410	0	0	0	0	0	0	0
Gross Proportional reinsurance accepted	R0420	0	0	0	0	0	0	0
Gross Non-proportional reinsurance accepted	R0430	0	0	0	0	0	0	0
Reinsurers' share	R0440	0	0	0	0	0	0	0
Net	R0500	0	0	0	0	0	0	0
Expenses incurred	R0550	58,856	0	0	0	721	0	59,577
Other expenses	R1200							0
Total expenses	R1300							59,577

# Appendix 1B Continued

# S.05.02.01 Premiums, claims and expenses by country for the year-ended 31 December 2016

		Hama Carreton	T F	/h	- <b>f</b> :		lif -li+i	Total Top 5 and home country
		· ·	•				on-life obligations)	·
		C0010	C0020	C0030	C0040	C0050	C0060	C0070
	R0010		GB	0	0	0	0	
		C0080	C0090	C0100	C110	C0120	C0130	C0140
Premiums written		€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s
Gross Direct business	R0110	122,741	2,131	0	0	0	0	124,872
Gross Proportional reinsurance accepted	R0120	0	0	0	0	0	0	0
Gross Non-proportional reinsurance accepted	R0130	0	0	0	0	0	0	0
Reinsurers' share	R0140	20,961	204	0	0	0	0	21,166
Net	R0200	101,780	1,927	0	0	0	0	103,707
Premiums earned								
Gross Direct business	R0210	118,772	2,271	0	0	0	0	121,043
Gross Proportional reinsurance accepted	R0220	0	0	0	0	0	0	0
Gross Non-proportional reinsurance accepted	R0230	0	0	0	0	0	0	0
Reinsurers' share	R0240	20,972	194	0	0	0	0	21,166
Net	R0300	97,800	2,077	0	0	0	0	99,877
Claims incurred								
Gross Direct business	R0310	54,815	2,931	0	0	0	0	57,746
Gross Proportional reinsurance accepted	R0320	0	0	0	0	0	0	0
Gross Non-proportional reinsurance accepted	R0330	0	0	0	0	0	0	0
Reinsurers' share	R0340	1,468	1,928	0	0	0	0	3,396
Net	R0400	53,347	1,003	0	0	0	0	54,350
Changes in other technical provisions								
Gross Direct business	R0410	0	0	0	0	0	0	0
Gross Proportional reinsurance accepted	R0420	0	0	0	0	0	0	0
Gross Non-proportional reinsurance accepted	R0430	0	0	0	0	0	0	0
Reinsurers' share	R0440	0	0	0	0	0	0	0
Net	R0500	0	0	0	0	0	0	0
Expenses incurred	R0550	54,510	811	0	0	0	0	55,321
Other expenses	R1200							270
Total expenses	R1300		_		_	_		55,591

## Appendix 2: S.19.01.21 Non-Life Insurance Claims year-ended 31 December 2017 Gross Claims Paid for the year-ended 31 December 2017

Line of business	Z0010	Total
Currency	Z0030	TOTAL
Accident year / underwriting year	Z0020	1 - Accident Year
Currency conversion	Z0040	0.0

#### Gross Claims Paid (non-cumulative)

(absolute amount)

#### Development year

Year		0	1	2	3	4	5	6	7	8	9	10 & +		In Current year	Sum of years (cumulative)
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110		C0170	C0180
		€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s		€'000s	€'000s
Prior	R0100											10,110	R0100	10,110	10,110
N-9	R0160	6,419	9,217	6,197	6,261	10,155	7,177	3,024	5,321	1,536	1,621		R0160	1,621	56,928
N-8	R0170	9,624	11,462	12,205	13,778	11,435	5,370,977	4,391	3,241	3,697			R0170	3,697	75,204
N-7	R0180	8,456	15,324	8,091	8,297	5,829	4,452,475	4,134	-3,294				R0180	-3,294	51,288
N-6	R0190	4,795	8,467	8,638	9,300	7,700	6,894,528	4,439					R0190	4,439	50,233
N-5	R0200	3,838	8,079	8,849	10,172	7,411	7,253						R0200	7,253	45,602
N-4	R0210	4,904	10,363	10,226	8,752	10,112							R0210	10,112	44,358
N-3	R0220	4,950	10,249	10,026	11,403								R0220	11,403	36,628
N-2	R0230	6,096	13,308	10,723									R0230	10,723	30,128
N-1	R0240	6,755	10,171										R0240	10,171	16,926
N	R0250	5,490											R0250	5,490	5,490
												Total	R0260	71,726	422,895

## Appendix 2: S.19.01.21 Non-Life Insurance Claims Continued

Gross Undiscounted Best Estimate Claims Provisions as at 31 December 2017

	C	Development yea	ır											
Year		0	1	2	3	4	5	6	7	8	9	10 & +		Year end (discounted data)
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300		C0360
		€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s		€'000s
Prior	R0100											24,191	R0100	23,999
N-9	R0160	0	0	0	0	0	0	0	0	8,291	7,473		R0160	7,414
N-8	R0170	0	0	0	0	0	0	0	11,700	7,925			R0170	7,869
N-7	R0180	0	0	0	0	0	0	10,875	7,622		-		R0180	7,563
N-6	R0190	0	0	0	0	0	23,994	18,012					R0190	17,868
N-5	R0200	0	0	0	0	24,609	18,066						R0200	17,923
N-4	R0210	0	0	0	33,432	26,522							R0210	26,308
N-3	R0220	0	0	53,791	47,529								R0220	47,152
N-2	R0230	0	76,349	64,397									R0230	63,891
N-1	R0240	91,270	71,773		-								R0240	71,233
N	R0250	99,745											R0250	99,023
	·		-									Total	R0260	390,242

## Appendix 2: S.19.01.21 Non-Life Insurance Claims Continued

## Gross Claims Paid for the year-ended 31 December 2016

Line of business	Z0010	Total
Currency	Z0030	TOTAL
Accident year / underwriting year	Z0020	1 - Accident Year
Currency conversion	Z0040	0.0

## Gross Claims Paid (non-cumulative)

(absolute amount)

Development year

Year		0	1	2	3	4	5	6	7	8	9	10 & +		In Current year	Sum of years (cumulative)
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110		C0170	C0180
Prior	R0100											11,506	R0100	11,506	11,506
N-9	R0160	6,246	9,681	6,200	6,675	8,177	6,433	6,306	8,631	510	4,999		R0160	4,999	63,858
N-8	R0170	6,419	9,217	6,197	6,261	10,155	7,177	3,024	5,321	1,536			R0170	1,536	55,307
N-7	R0180	9,624	11,462	12,205	13,778	11,435	5,371	4,391	3,241		='		R0180	3,241	71,507
N-6	R0190	8,456	15,324	8,091	8,297	5,829	4,452	4,134		-			R0190	4,134	54,582
N-5	R0200	4,795	8,467	8,638	9,300	7,700	6,895						R0200	6,895	45,794
N-4	R0210	3,838	8,079	8,849	10,172	7,411		='					R0210	7,411	38,348
N-3	R0220	4,904	10,364	10,229	8,752								R0220	8,752	34,249
N-2	R0230	4,950	10,252	10,029		='							R0230	10,029	25,231
N-1	R0240	6,098	13,313		<del>-</del>								R0240	13,313	19,411
N	R0250	6,763											R0250	6,763	6,763
			-									Total	R0260	78,578	426,556

Appendix 2: S.19.01.21 Non-Life Insurance Claims Continued

Gross Undiscounted Best Estimate Claims Provisions as at 31 December 2016

	De	evelopment ye	ar											V 1/11 . 1
Year		0	1	2	3	4	5	6	7	8	9	10 & +		Year end (discounted data)
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300		C0360
Prior	R0100											30,156	R0100	30,122
N-9	R0160	0	0	0	0	0	0	0	0	0	9,898		R0160	9,880
N-8	R0170	0	0	0	0	0	0	0	0	8,291			R0170	8,282
N-7	R0180	0	0	0	0	0	0	0	11,700				R0180	11,689
N-6	R0190	0	0	0	0	0	0	10,875					R0190	10,866
N-5	R0200	0	0	0	0	0	23,994						R0200	23,966
N-4	R0210	0	0	0	0	24,609							R0210	24,580
N-3	R0220	0	0	0	33,433								R0220	33,386
N-2	R0230	0	0	53,803									R0230	53,728
N-1	R0240	0	76,413										R0240	76,319
N	R0250	91,349											R0250	91,250
												Total	R0260	374,066

# Appendix 3: S.17.01.02 Non-Life Technical Provisions for the year-ended 31 December 2017

		Discret business		d proportional re				Direct business and accepted proportional reinsurance Accepted non-proportional reinsurance										
		Direct busines	ss and accepte	a proportional re	insurance			Direct busines	s and accepte	d proportional	reinsurance			Accepted nor	-proportional	Non-		
					Motor		Marine.	Fire and						Non-	Non-	proportional	Non-	1
		Medical	Income	Workers'	vehicle	Other motor	aviation and	other	General	Credit and	Legal		Miscellaneous	proportional	proportional	marine.	proportional	Total Non-
		expense	protection	compensation	liability	insurance	transport	damage to	liability	suretyship	expenses	Assistance	financial loss	health	casualty	aviation and	property	Life
		insurance	insurance	insurance	insurance	mourance	insurance	property	insurance	insurance	insurance		illialiciai ioss	reinsurance	reinsurance	transport	reinsurance	obligation
					mourance		ilisurance	insurance						remsurance	remsurance	reinsurance	remsurance	1
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0170	
		€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s
Technical provisions calculated as a whole	R0010	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Direct business	R0020	0	0	0	0	0	0	0	0	0	0	0	0					0
Accepted proportional reinsurance business	R0030	0	0	0	0	0	0	0	0	0	0	0	0					0
Accepted non-proportional reinsurance	R0040													0	0	0	0	0
Total recoverable from reinsurance/SPV after the adjustment	R0050	0	0	0	0	0	0	0	Ō	0	0	0	0	0	0	0	0	0
for expected losses due to counterparty default																		
Technical provisions calculated as a sum of BE and RM																		
Best estimate Premium Provisions																		
Gross - Total	R0060	52	208	0	1.386	347	34	2,123	15,525	0	172	0	0	0	0	0	0	19,847
Gross - Direct business	R0070	52	208	0	1,386	347	34	2,123	15,525	0	172	0	0			Ü	Ü	19,847
Gross - Accepted proportional reinsurance business	R0080	0	0	0	0	0	0	0	0	0	0	0	0					0
Gross - Accepted non-proportional reinsurance business	R0090	_		_			-	-					-	0	0	0	0	0
Total recoverable from reinsurance/SPV and Finite Re before the	R0100	-3	-13	0	-99	-25	-1	-1,709	-544	0	-17	0	0	0	0	0	0	
adjustment for expected losses due to counterparty default	K0100	-3	-13	U	-99	-25	-1	-1,709	-544	U	-1/	0	U	0	U	U	U	-2,411
Recoverables from reinsurance (except SPV and Finite Reinsurance)	) R0110	-3	-13	0	-99	-25	-1	-1.709	-544	0	-17	0	0	0	0	0	0	-2,411
before adjustment for expected losses	KUIIU	-5	-13	Ü	-99	-23	-1	-1,709	-344	U	-1/	U	U	U	0	U	U	-2,411
Recoverables from SPV before adjustment for expected losses	R0120	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Recoverables from Finite Reinsurance before adjustment for	R0130	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
expected losses		_	_	-		_	_			_			_			-	Ť	
Total recoverable from reinsurance/SPV and Finite Re after the	R0140	-3	-13	0	-99	-25	-1	-1,709	-544	0	-17	0	0	0	0	0	0	-2,411
adjustment for expected losses due to counterparty default  Net Best Estimate of Premium Provisions	R0150	55	221	0	1.485	371	35	3,833	16.069	0	189	0	0	0	0	0	0	22.258
Claims provisions	KUISU	33	221	U	1,485	3/1	35	3,833	16,069	U	189	U	U	- 0	0	U	U	22,258
Gross - Total	R0160	390	1,559	0	14,192	3,548	280	13,550	355,200	0	1,523	0	0	0	0	0	0	390,242
Gross - Direct business	R0170	390	1,559	0	14,192	3,548	280	13,550	355,200	0	1,523	0	0	-	-		Ů	390,242
Gross - Accepted proportional reinsurance business	R0180	0	0	0	0	0	0	0	0	0	0	0	0					0
Gross - accepted non-proportional reinsurance business	R0190													0	0	0	0	0
Total recoverable from reinsurance/SPV and Finite Re before the	R0200	0	0	0	14	4	0	7,548	19,892	0	0	0	0	0	0	0	0	27,458
adjustment for expected losses due to counterparty default	KU2UU	U	U	U	14	4	U	7,548	19,892	U	U	U	U	U	U	U	U	27,458
Recoverables from reinsurance (except SPV and Finite Reinsurance)	) R0210	0	0	0	14	4	0	7,548	19,892	0	0	0	0	0	0	0	0	27,458
before adjustment for expected losses				·		· ·												
Recoverables from SPV before adjustment for expected losses	R0220	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Recoverables from Finite Reinsurance before adjustment for	R0230	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
expected losses  Total recoverable from reinsurance/SPV and Finite Re after the						1	$\vdash$			<del>                                     </del>			<del>                                     </del>	<b>—</b>				$\overline{}$
adjustment for expected losses due to counterparty default	R0240	0	0	0	14	4	0	7,548	19,892	0	0	0	0	0	0	0	0	27,458
Net Best Estimate of Claims Provisions	R0250	390	1.559	0	14.178	3,545	280	6,002	335.308	0	1.523	0	0	0	0	0	0	362.784
Total Best estimate - Gross	R0260	442	1,767	0	15,578	3,895	314	15,673	370,725	0	1,695	0	0	0	0	0	0	410,088
Total Best estimate - Net	R0270	445	1,780	0	15,663	3,916	315	9,835	351,376	0	1,712	0	0	0	0	0	0	385,042
Risk margin	R0280	34	134	0	1,180	295	24	741	26,468	0	129	0	0	0	0	0	0	29,004
Amount of the transitional on Technical Provisions																		
TP as a whole	R0290	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Best Estimate	R0300	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Risk Margin	R0310	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Technical provisions		475	4.004		46.750	4.400	220	45.444	207.405		4.022							420.002
Technical provisions - total	R0320	475	1,901	0	16,758	4,190	338	16,414	397,193	0	1,823	0	0	0	0	0	0	439,092
Recoverable from reinsurance contract/SPV and Finite Re after the	R0330	-3	-13	0	-85	-21	-1	5.838	19.349	0	-17	0	0	0	0	0	0	25,047
adjustment for expected losses due to counterparty default - total							-	-,	,	1	-	_	-	]	_	_		,
Technical provisions minus recoverables from reinsurance/SPV and	R0340	479	1.914	0	16.843	4.211	339	10.575	377,844	0	1.841	0	0	0	0	0	0	414,045
Finite Re- total	KU340	4/9	1,914	U	16,843	4,211	339	10,575	3//,844	U	1,841	U	U	U	U	U	U	414,045

# Appendix 3 Continued

# S.17.01.02 Non-Life Technical Provisions for the year-ended 31 December 2016

	ı	Direct business and accepted proportional reinsurance Direct business and accepted proportional reinsurance							Accepted non-proportional reinsurance									
	1	cut busines	accepte					Fire and	u uccepte	- F. OPO. COIIGI				seepteu iioi	орогиона	Non-		
		Medical	Income	Workers'	Motor vehicle		Marine,	other	General	Credit and	Legal			Non-	Non-	proportional	Non-	Total Non-
		expense	protection	compensation	liability	Other motor	aviation and	damage to	liability	suretyship	expenses	Assistance	Miscellaneous	proportional	proportional	marine,	proportional	Life
		insurance	insurance	insurance	insurance	insurance	transport	property	insurance	insurance	insurance	Assistance	financial loss	health	casualty	aviation and	property	obligation
		saranee	mourance	sarance	saranee		insurance	insurance	sarance	surunce	mourance			reinsurance	reinsurance	transport	reinsurance	obligation.
	- 1	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	reinsurance C0160	C0170	
	- 1	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s	€'000s
Technical provisions calculated as a whole	R0010	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	R0020	0	0	0	0	0	0	0	0	0	0	0	0					0
Accepted proportional reinsurance business	R0030	0	0	0	0	0	0	0	0	0	0	0	0					0
Accepted non-proportional reinsurance	R0040													0	0	0	0	0
Total recoverable from reinsurance/SPV after the adjustment	R0050	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
for expected losses due to counterparty default					Ů		, i	-			- u				Ů			ů
Technical provisions calculated as a sum of BE and RM																		
Best estimate																		
Premium Provisions Gross - Total	R0060	52	207	0	1.546	387	28	2,332	13.070	0	289	0	0	0	0	0	0	17.911
	R0070	52	207	0	1,546	387	28	2,332	13,070	0	289	0	0	U	U	0	U	17,911
	R0080	0	0	0	0	0	0	0	0	0	0	0	0					0
	R0090	Ü	Ü		Ü		ŭ	ŭ		- i			ŭ	0	0	0	0	0
Total recoverable from reinsurance/SPV and Finite Re before the	ı		40	0	-00			4.755	507	0	25	0		0	0	0	0	
adjustment for expected losses due to counterparty default	R0100	-4	-18	0	-98	-24	-1	-1,756	-507	0	-35	0	0	0	0	0	0	-2,444
Recoverables from reinsurance (except SPV and Finite Reinsurance)	R0110	-4	-18	0	-98	-24	-1	-1,756	-507	0	-35	0	0	0	0	0	0	-2,444
before adjustment for expected losses		·								•			-			-	,	
	R0120	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Recoverables from Finite Reinsurance before adjustment for	R0130	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
expected losses																		
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140	-4	-18	0	-98	-24	-1	-1,756	-507	0	-35	0	0	0	0	0	0	-2,444
	R0150	56	225	0	1.644	411	29	4.088	13,577	0	325	0	0	0	0	0	0	20,355
Claims provisions	110130	30	223	Ů	1,044	411	23	4,000	13,377		323		Ů	0	Ů	Ů	Ü	20,333
	R0160	271	1.086	0	15.362	3,840	127	13,278	338.358	0	1.744	0	0	0	0	0	0	374,066
	R0170	271	1,086	0	15,362	3,840	127	13,278	338,358	0	1,744	0	0		-	-	-	374,066
	R0180	0	0	0	0	0	0	0	0	0	0	0	0					0
Gross - accepted non-proportional reinsurance business	R0190													0	0	0	0	0
Total recoverable from reinsurance/SPV and Finite Re before the	R0200	0	0	0	1.565	391	0	9,050	28.264	0	0	0	0	0	0	0	0	39,269
adjustment for expected losses due to counterparty default	NOZOO	Ü	Ů	Ů	1,505	331	Ů	3,030	20,204		Ü		Ů	0	Ů	Ů	Ü	33,203
Recoverables from reinsurance (except SPV and Finite Reinsurance)	R0210	0	0	0	1,565	391	0	9,050	28,264	0	0	0	0	0	0	0	0	39,269
before adjustment for expected losses		_	0	_		_					_		_		_	_	_	
	R0220	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Recoverables from Finite Reinsurance before adjustment for expected losses	R0230	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total recoverable from reinsurance/SDV and Einite Relafter the	- 1																	
adjustment for expected losses due to counterparty default	R0240	0	0	0	1,565	391	0	9,050	28,264	0	0	0	0	0	0	0	0	39,269
Net Best Estimate of Claims Provisions	R0250	271	1,086	0	13,797	3,449	127	4,228	310,095	0	1,744	0	0	0	0	0	0	334,797
	R0260	323	1,293	0	16,908	4,227	155	15,610	351,428	0	2,033	0	0	0	0	0	0	391,977
	R0270	328	1,310	0	15,441	3,860	156	8,316	323,672	0	2,068	0	0	0	0	0	0	355,151
-	R0280	24	96	0	1,129	282	11	608	23,671	0	151	0	0	0	0	0	0	25,974
Amount of the transitional on Technical Provisions			_	_	_	_	_	_	_	_	_	_	_	_	_	_	_	
	R0290 R0300	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	R0300	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Technical provisions	110210	U	U	0	U		U	U	U	U	U	U	U	0	U		U	U
	R0320	347	1.388	0	18.038	4.509	167	16.218	375.099	0	2.184	0	0	0	0	0	0	417.951
·			-,	1	,	.,===		,	,		-,		1				-	,
Recoverable from reinsurance contract/SPV and Finite Re after the	R0330	-4	-18	0	1,467	367	-1	7,294	27,756	0	-35	0	0	0	0	0	0	36,826
adjustment for expected losses due to counterparty default - total				<u> </u>									<u> </u>					
Technical provisions minus recoverables from reinsurance/SPV and	R0340	352	1.406	0	16,571	4,143	167	8.924	347,343	0	2,220	0	0	0	0	0	0	381,125
Finite Re- total			-,		,	.,		-,	,		-,						-	,

## Appendix 4: S.02.01.02 Balance Sheet as at the year-ended 31 December 2017

		Solvency II value
Assets		C0010
		€'000s
Goodwill	R0010	
Deferred acquisition costs	R0020	
Intangible assets	R0030	0
Deferred tax assets	R0040	0
Pension benefit surplus	R0050	0
Property, plant & equipment held for own use	R0060	0
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	1,211,772
Property (other than for own use)	R0080	92,752
Holdings in related undertakings, including participations	R0090	0
Equities	R0100	190,679
Equities - listed	R0110	186,215
Equities - unlisted	R0120	4,464
Bonds	R0130	754,367
Government Bonds	R0140	646,867
Corporate Bonds	R0150	104,909
Structured notes	R0160	0
Collateralised securities	R0170	2,590
Collective Investments Undertakings	R0180	53,620
Derivatives	R0190	91,382
Deposits other than cash equivalents	R0200	28,972
Other investments	R0210	0
Assets held for index-linked and unit-linked contracts	R0220	0
Loans and mortgages	R0230	20,429
Loans on policies	R0240	0
Loans and mortgages to individuals	R0250	0
Other loans and mortgages	R0260	20,429
Reinsurance recoverables from:	R0270	25,047
Non-life and health similar to non-life	R0280	25,047
Non-life excluding health	R0290	25,050
Health similar to non-life	R0300	-3
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	0
Health similar to life	R0320	0
Life excluding health and index-linked and unit-linked	R0330	0
Life index-linked and unit-linked	R0340	0
Deposits to cedants	R0350	0
Insurance and intermediaries receivables	R0360	20,159
Reinsurance receivables	R0370	4,569
Receivables (trade, not insurance)	R0380	5,270
Own shares (held directly)	R0390	0
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	0
Cash and cash equivalents	R0410	104,227
Any other assets, not elsewhere shown	R0420	0
Total assets	R0500	1,391,473

# Appendix 4: S.02.01.02 Balance Sheet as at the year-ended 31 December 2017 Continued

		Solvency II value
Liabilities		C0010
		€'000s
Technical provisions – non-life	R0510	439,092
Technical provisions – non-life (excluding health)	R0520	438,483
Technical provisions calculated as a whole	R0530	0
Best Estimate	R0540	409,647
Risk margin	R0550	28,836
Technical provisions - health (similar to non-life)	R0560	609
Technical provisions calculated as a whole	R0570	0
Best Estimate	R0580	442
Risk margin	R0590	168
Technical provisions - life (excluding index-linked and unit-linked)	R0600	0
Technical provisions - health (similar to life)	R0610	0
Technical provisions calculated as a whole	R0620	0
Best Estimate	R0630	0
Risk margin	R0640	0
Technical provisions – life (excluding health and index-linked and unit-linked)	R0650	0
Technical provisions calculated as a whole	R0660	0
Best Estimate	R0670	0
Risk margin	R0680	0
Technical provisions – index-linked and unit-linked	R0690	0
Technical provisions calculated as a whole	R0700	0
Best Estimate	R0710	0
Risk margin	R0720	0
Other technical provisions	R0730	
Contingent liabilities	R0740	0
Provisions other than technical provisions	R0750	300
Pension benefit obligations	R0760	0
Deposits from reinsurers	R0770	0
Deferred tax liabilities	R0780	6,386
Derivatives	R0790	91,353
Debts owed to credit institutions	R0800	0
Financial liabilities other than debts owed to credit institutions	R0810	0
Insurance & intermediaries payables	R0820	2,385
Reinsurance payables	R0830	917
Payables (trade, not insurance)	R0840	0
Subordinated liabilities	R0850	0
Subordinated liabilities not in Basic Own Funds	R0860	0
Subordinated liabilities in Basic Own Funds	R0870	0
Any other liabilities, not elsewhere shown	R0880	91,102
Total liabilities	R0900	631,535
Excess of assets over liabilities	R1000	759,937

## Appendix 4 Continued

## S.02.01.02 Balance Sheet as at the year-ended 31 December 2016

		Solvency II value
Assets		C0010
A33Ct3		€'000s
Goodwill	R0010	€ 0003
Deferred acquisition costs	R0020	
Intangible assets	R0030	0
Deferred tax assets	R0040	0
Pension benefit surplus	R0050	0
Property, plant & equipment held for own use	R0060	0
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	1,260,918
Property (other than for own use)	R0080	92,739
Holdings in related undertakings, including participations	R0090	0
Equities	R0100	198,515
Equities - listed	R0110	195,251
Equities - unlisted	R0120	3,265
Bonds	R0130	718,566
Government Bonds	R0140	621,689
Corporate Bonds	R0150	93,809
Structured notes	R0160	0
Collateralised securities	R0170	3,068
Collective Investments Undertakings	R0170	55,808
Derivatives	R0190	113,372
Deposits other than cash equivalents	R0200	81,917
Other investments	R0210	0
Assets held for index-linked and unit-linked contracts	R0220	0
	R0230	23,452
Loans and mortgages  Loans on policies	R0240	0
	R0250	0
Loans and mortgages to individuals Other loans and mortgages	R0260	23,452
Reinsurance recoverables from:	R0270	36,826
Non-life and health similar to non-life	R0270	36,826
	R0290	36,848
Non-life excluding health Health similar to non-life	R0300	-22
		0
Life and health similar to life, excluding health and index-linked and unit-linked Health similar to life	R0310	0
	R0320	0
Life excluding health and index-linked and unit-linked Life index-linked and unit-linked	R0330 R0340	0
	R0350	0
Deposits to cedants Insurance and intermediaries receivables		10,689
	R0360	1,804
Reinsurance receivables	R0370	7,074
Receivables (trade, not insurance)	R0380	
Own shares (held directly)	R0390	0
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	0
Cash and cash equivalents	R0410	44,061
Any other assets, not elsewhere shown	R0420	1 294 925
Total assets	R0500	1,384,825

## Appendix 4 Continued

## S.02.01.02 Balance Sheet as at the year-ended 31 December 2016 Continued

		Solvency II value
Liabilities		C0010
Technical provisions – non-life	R0510	417,951
Technical provisions – non-life (excluding health)	R0520	416,216
Technical provisions calculated as a whole	R0530	0
Best Estimate	R0540	390,361
Risk margin	R0550	25,855
Technical provisions - health (similar to non-life)	R0560	1,735
Technical provisions calculated as a whole	R0570	0
Best Estimate	R0580	1,616
Risk margin	R0590	119
Technical provisions - life (excluding index-linked and unit-linked)	R0600	0
Technical provisions - health (similar to life)	R0610	0
Technical provisions calculated as a whole	R0620	0
Best Estimate	R0630	0
Risk margin	R0640	0
Technical provisions – life (excluding health and index-linked and unit-linked)	R0650	0
Technical provisions calculated as a whole	R0660	0
Best Estimate	R0670	0
Risk margin	R0680	0
Technical provisions – index-linked and unit-linked	R0690	0
Technical provisions calculated as a whole	R0700	0
Best Estimate	R0710	0
Risk margin	R0720	0
Other technical provisions	R0730	
Contingent liabilities	R0740	0
Provisions other than technical provisions	R0750	800
Pension benefit obligations	R0760	0
Deposits from reinsurers	R0770	0
Deferred tax liabilities	R0780	5,811
Derivatives	R0790	114,234
Debts owed to credit institutions	R0800	0
Financial liabilities other than debts owed to credit institutions	R0810	0
Insurance & intermediaries payables	R0820	1,809
Reinsurance payables	R0830	1,297
Payables (trade, not insurance)	R0840	54
Subordinated liabilities	R0850	0
Subordinated liabilities not in Basic Own Funds	R0860	0
Subordinated liabilities in Basic Own Funds	R0870	0
Any other liabilities, not elsewhere shown	R0880	9,624
Total liabilities	R0900	551,580
Excess of assets over liabilities	R1000	833,245

# Appendix 5: S.23.01.01 Own Funds as at 31 December 2017

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Books and the form of the form of the standard form		€'000s	€'000s	€'000s	€'000s	€'000s
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35						
Ordinary share capital (gross of own shares)	R0010	0	0		0	
Share premium account related to ordinary share capital	R0030	О	0		0	
Initial funds, members' contributions or the equivalent basic own - fund item for mutual	R0040	_	_		_	
and mutual-type undertakings	R0050	0	0		0	
Subordinated mutual member accounts Surplus funds	R0050	0	0	0	0	0
Preference shares	R0090	0	0	0	0	0
Share premium account related to preference shares	R0110	0		0	0	0
Reconciliation reserve	R0130	744,879	744,879	Ŭ	Ŭ	Ŭ
Subordinated liabilities	R0140	0	,	0	0	0
An amount equal to the value of net deferred tax assets	R0160	О				О
Other items approved by supervisory authority as basic own funds not specified above	R0180	О	О	0	О	О
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	R0220	_				
funds  Deductions		0				
Deductions  Deductions for participations in financial and credit institutions	R0230	0	0	0	0	
Total basic own funds after deductions	R0230 R0290	744,879	744,879	0	0	0
Ancillary own funds		·	744,079	U		J
Unpaid and uncalled ordinary share capital callable on demand Unpaid and uncalled initial funds, members' contributions or the equivalent basic own	R0300	0			0	
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310	0			0	
Unpaid and uncalled preference shares callable on demand	R0320	0			o	О
A legally binding commitment to subscribe and pay for subordinated liabilities on	R0330					
demand		0			0	0
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340	0			0	
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350	o			0	o
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360	0			0	
Supplementary members calls - other than under first subparagraph of Article 96(3) of	R0370					
the Directive 2009/138/EC Other ancillary own funds	R0390	<u> </u>			0	0
Other ancillary own runds	R0390	0			0	0
		Total	Tier 1 -	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
		€'000s	€'000s	€'000s	€'000s	€'000s
Total ancillary own funds	R0400	о			0	0
Available and eligible own funds						_
Total available own funds to meet the SCR Total available own funds to meet the MCR	R0500 R0510	744,879	744,879	0	0	0
Total eligible own funds to meet the NCR	R0510	744,879 744,879	744,879 744,879	0	0	0
Total eligible own funds to meet the SCR  Total eligible own funds to meet the MCR	R0540	744,879	744,879	0	0	
SCR	R0580	216,378	744,679	<u> </u>		
MCR	R0600	54,095				
Ratio of Eligible own funds to SCR	R0620	344.25%				
Ratio of Eligible own funds to MCR	R0640	1376.99%				
		-	7			
		Total C0060	+	7		
		€'000s		1		
Reconciliation reserve		20000		1		
Excess of assets over liabilities	R0700	759,937		1		
Own shares (held directly and indirectly)	R0710	0				
Foreseeable dividends, distributions and charges	R0720	15,058				
Other basic own fund items	R0730	0				
Adjustment for restricted own fund items in respect of matching adjustment portfolios	R0740	0				
and ring fenced funds Reconciliation reserve	R0760	744.879		1		
Expected profits	70,00	744,679		1		
Expected profits included in future premiums (EPIFP) - Life business	R0770	0		1		
Expected profits included in future premiums (EPIFP) - Non- life business	R0780	0		1		
Total Expected profits included in future premiums (EPIFP)	R0790	0		1		
		-		•		

## Appendix 5 Continued

## S.23.01.01 Own Funds as at 31 December 2016

						1
		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		€'000s	€'000s	€'000s	€'000s	€'000s
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35						
Ordinary share capital (gross of own shares)	R0010	0	0		0	
Share premium account related to ordinary share capital	R0030	0	0		0	
Initial funds, members' contributions or the equivalent basic own - fund item for	R0040	0	o		0	
mutual and mutual-type undertakings Subordinated mutual member accounts	R0050	0	0	0	0	0
Surplus funds	R0070	0	О	Ü		
Preference shares	R0090	0		0	0	0
Share premium account related to preference shares	R0110	0		0	0	0
Reconciliation reserve	R0130	808,245	808,245			
Subordinated liabilities	R0140	0		0	0	0
An amount equal to the value of net deferred tax assets	R0160	0				0
Other items approved by supervisory authority as basic own funds not specified above	R0180	О	0	0	0	О
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		Ü	Ü	Ŭ	<u> </u>	Ů
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	R0220					
own funds  Peductions	ROZZO	0				
Deductions for participations in financial and credit institutions	R0230	0	0	0	0	
Total basic own funds after deductions	R0290	808,245	808,245	0	0	0
Ancillary own funds			,			
Unpaid and uncalled ordinary share capital callable on demand	R0300	О			0	
Unpaid and uncalled initial funds, members' contributions or the equivalent basic	R0310					
own fund item for mutual and mutual - type undertakings, callable on demand		О			0	
Unpaid and uncalled preference shares callable on demand	R0320	0			0	0
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330	О			О	О
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340	0			0	
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350	0			0	0
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/FC	R0360	0			0	Ü
Supplementary members calls - other than under first subparagraph of Article	R0370	0			0	0
96(3) of the Directive 2009/138/EC Other ancillary own funds	R0390	0			0	0
		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010 €'000s	C0020 €'000s	C0030 €'000s	C0040 €'000s	C0050 €'000s
Total ancillary own funds	R0400	0	20003	60003	0	0
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	808,245	808,245	0	0	0
Total available own funds to meet the MCR	R0510	808,245	808,245	0	0	
Total eligible own funds to meet the SCR	R0540	808,245	808,245	0	0	0
Total eligible own funds to meet the MCR	R0550 R0580	808,245	808,245	0	0	
SCR MCR	R0580 R0600	207,215 51,804				
Ratio of Eligible own funds to SCR	R0620	390.05%				
Ratio of Eligible own funds to MCR	R0640	1560.20%				
		Total C0060	1			
		€'000s				
Reconciliation reserve						
Excess of assets over liabilities	R0700	833,245				
Own shares (held directly and indirectly)	R0710	0				
Foreseeable dividends, distributions and charges	R0720	25,000				
Other basic own fund items	R0730	0				
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	О				
Reconciliation reserve	R0760	808,245				
Expected profits						
Expected profits included in future premiums (EPIFP) - Life business	R0770	О				
Expected profits included in future premiums (EPIFP) - Non- life business	R0780	0				
Total Expected profits included in future premiums (EPIFP)	R0790	0				

#### Article 112 **Z0010** 2 - Regular reporting

		Net solve
		С
		€.
Market risk	R0010	13
Counterparty default risk	R0020	2:
Life underwriting risk	R0030	
Health underwriting risk	R0040	1
Non-life underwriting risk	R0050	13
Diversification	R0060	-6
Intangible asset risk	R0070	
Basic Solvency Capital Requirement	R0100	22
		-

Net solvency capital requirement	Gross solvency capital requirement	Allocation from adjustments due to RFF and Matching adjustments portfolios
C0030	C0040	C0050
€.000s	€.000s	€.000s
135,432	135,432	0
21,085	21,085	0
О	0	О
1,243	1,243	0
137,100	137,100	0
-68,400	-68,400	
0	0	
226,460	226,460	

#### **Calculation of Solvency Capital Requirement**

Adjustment due to RFF/MAP nSCR aggregation	R0120	
Operational risk	R0130	
Loss-absorbing capacity of technical provisions	R0140	
Loss-absorbing capacity of deferred taxes	R0150	
Capital requirement for business operated in accordance with Art.		
4 of Directive 2003/41/EC	R0160	
Solvency Capital Requirement excluding capital add-on	R0200	
Capital add-on already set	R0210	
Solvency capital requirement for undertakings under		
consolidated method	R0220	
Other information on SCR		
Capital requirement for duration-based equity risk sub-module	R0400	
Total amount of Notional Solvency Capital Requirements for		
remaining part	R0410	
Total amount of Notional Solvency Capital Requirements for ring		
fenced funds	R0420	
Total amount of Notional Solvency Capital Requirements for		
matching adjustment portfolios	R0430	
Diversification effects due to RFF nSCR aggregation for article 304		
Diversification effects due to KFF fisch aggregation for afficie 304	R0440	
Method used to calculate the adjustment due to RFF/MAP nSCR		
aggregation	R0450	4
Net future discretionary benefits	R0460	

C0100	
€.000s	
0	
12,303	
0	
-22,384	
0	
216,378	
0	
216,378	
-	
0	
0	
О	
o	
<u> </u>	
О	
4 - No adjustment	
0	

# Appendix 6 Continued

# S.25.01.01 Solvency Capital Requirement – for undertakings on Standard Formula – as at 31 December 2016

4 443	70040	2 2 2 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2
Article 112	Z0010	2 - Regular reporting

		Net solvency Gross solvency to RFF capital requirement requirement adjustr		Allocation from adjustments due to RFF and Matching adjustments portfolios
		C0030	C0040	C0050
		€000's	€000's	€000's
Market risk	R0010	136,551	136,551	0
Counterparty default risk	R0020	17,001	17,001	0
Life underwriting risk	R0030	О	О	0
Health underwriting risk	R0040	1,019	1,019	0
Non-life underwriting risk	R0050	126,832	126,832	0
Diversification	R0060	-64,429	-64,429	
Intangible asset risk	R0070	О	0	
Basic Solvency Capital Requirement	R0100	216,972	216,972	

Calculation of Solvency Capital Requirement		C0100
		€000's
Adjustment due to RFF/MAP nSCR aggregation	R0120	0
Operational risk	R0130	11,759
Loss-absorbing capacity of technical provisions	R0140	0
Loss-absorbing capacity of deferred taxes	R0150	-21,517
Capital requirement for business operated in accordance with Art.		
4 of Directive 2003/41/EC	R0160	0
Solvency Capital Requirement excluding capital add-on	R0200	207,215
Capital add-on already set	R0210	О
Solvency capital requirement for undertakings under		
consolidated method	R0220	207,215
Other information on SCR		
Capital requirement for duration-based equity risk sub-module	R0400	0
Total amount of Notional Solvency Capital Requirements for		
remaining part	R0410	О
Total amount of Notional Solvency Capital Requirements for ring		
fenced funds	R0420	О
Total amount of Notional Solvency Capital Requirements for		
matching adjustment portfolios	R0430	О
Diversification offers due to DEC acceptance for a risk 204		
Diversification effects due to RFF nSCR aggregation for article 304	R0440	О
Method used to calculate the adjustment due to RFF/MAP nSCR		
aggregation	R0450	4 - No adjustment
Net future discretionary benefits	R0460	0

## Appendix 7: S.28.01.01 Minimum Capital Requirement – Only life of only non-life insurance or reinsurance activity – as at 31 December 2017

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

MCRNL Result

	C0010	
R0010	53,564	

Medical expense insurance and proportional reinsurance Income protection insurance and proportional reinsurance Workers' compensation insurance and proportional reinsurance Motor vehicle liability insurance and proportional reinsurance Other motor insurance and proportional reinsurance Marine, aviation and transport insurance and proportional reinsurance Fire and other damage to property insurance and proportional reinsurance General liability insurance and proportional reinsurance Credit and suretyship insurance and proportional reinsurance Legal expenses insurance and proportional reinsurance Assistance and proportional reinsurance Miscellaneous financial loss insurance and proportional reinsurance Non-proportional health reinsurance Non-proportional casualty reinsurance Non-proportional marine, aviation and transport reinsurance Non-proportional property reinsurance

	Net (of	Net (of
	reinsurance/SPV)	reinsurance)
	best estimate and	written premiums
	TP calculated as a	in the last 12
	whole	months
	C0020	C0030
	€'000s	€'000s
R0020	445	390
R0030	1,780	1,558
R0040	0	0
R0050	15,663	6,900
R0060	3,916	1,725
R0070	315	399
R0080	9,835	10,340
R0090	351,376	95,236
R0100	0	0
R0110	1,712	1,616
R0120	0	0
R0130	0	0
R0140	0	0
R0150	0	0
R0160	0	0
R0170	0	0

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

MCRL Result

	C0040
R0200	0

Obligations with profit participation - guaranteed benefits Obligations with profit participation - future discretionary benefits Index-linked and unit-linked insurance obligations Other life (re)insurance and health (re)insurance obligations Total capital at risk for all life (re)insurance obligations

	Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
	C0050	C0060
	€'000s	€'000s
R0210	0	
R0220	0	
R0230	0	
R0240	0	
R0250		0

Net (of

#### **Overall MCR calculation**

Linear MCR SCR MCR cap MCR floor Combined MCR Absolute floor of the MCR

Minimum Capital Requirement

	C0070
	€'000s
R0300	53,564
R0310	216,378
R0320	97,370
R0330	54,095
R0340	54,095
R0350	2,500
	C0070
R0400	54.095

## Appendix 7 Continued

S.28.01.01 Minimum Capital Requirement – Only life of only non-life insurance or reinsurance activity - as at 31 December 2016

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

MCRNL Result

	C0010
R0010	48,667

Medical expense insurance and proportional reinsurance Income protection insurance and proportional reinsurance Workers' compensation insurance and proportional reinsurance Motor vehicle liability insurance and proportional reinsurance Other motor insurance and proportional reinsurance Marine, aviation and transport insurance and proportional reinsurance Fire and other damage to property insurance and proportional reinsurance General liability insurance and proportional reinsurance Credit and suretyship insurance and proportional reinsurance Legal expenses insurance and proportional reinsurance Assistance and proportional reinsurance Miscellaneous financial loss insurance and proportional reinsurance Non-proportional health reinsurance Non-proportional casualty reinsurance Non-proportional marine, aviation and transport reinsurance Non-proportional property reinsurance

	Net (of	Net (of reinsurance)
reinsurance/SPV)		written
	best estimate and	
	TP calculated as a	premiums in the
	whole	last 12 months
	C0020	C0030
	€'000s	€'000s
R0020	328	368
R0030	1,310	1,471
R0040	0	0
R0050	15,441	5,732
R0060	3,860	1,433
R0070	156	336
R0080	8,316	10,349
R0090	323,672	82,329
R0100	0	0
R0110	2,068	1,689
R0120	0	0
R0130	0	0
R0140	0	0
R0150	0	0
R0160	0	0
R0170	0	0

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

MCRL Result

R0200 0		C0040
	R0200	0

Obligations with profit participation - guaranteed benefits Obligations with profit participation - future discretionary benefits Index-linked and unit-linked insurance obligations Other life (re)insurance and health (re)insurance obligations Total capital at risk for all life (re)insurance obligations

	reinsurance/SPV)	reinsurance/SPV
	best estimate and	) total capital at
	TP calculated as a	risk
	C0050	C0060
	€'000s	€'000s
R0210	0	0.0
R0220	0	0.0
R0230	0	0.0
R0240	0	0.0
R0250	0.0	0

Net (of

Net (of

#### **Overall MCR calculation**

Linear MCR SC M M Co Αb

LITICAL IVICIN
SCR
MCR cap
MCR floor
Combined MCR
Absolute floor of the MCR
Minimum Capital Requirement

	C0070
	€'000s
R0300	48,667
R0310	207,215
R0320	93,247
R0330	51,804
R0340	51,804
R0350	2,500
	C0070
R0400	51,804