Acorn Life Designated Activity Company

Solvency and Financial Condition Report

For year ending 31 December 2024

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Introduction

The EU-wide Solvency II Directive came into force with effect from 1 January 2016. This document is the ninth Solvency and Financial Condition Report (SFCR) published under this directive for Acorn Life DAC (the "Company"). The SFCR provides narrative information in quantitative and qualitative form including quantitative reporting templates (QRTs). The report covers the Business and Performance of the Company, its System of Governance, Risk Profile, Valuation for Solvency Purposes and Capital Management.

Business and Performance Summary

The Company is a regulated life insurance firm which provides life, pension, and investment products to personal and small business customers in Ireland. Its brand strength is based on local distribution, product innovation, flexibility, and strong investment performance. The solvency objective of the Company is to ensure that it maintains sufficient capital to meet its obligations to its policyholders and other stakeholders as liabilities fall due.

During 2024, we made good progress on our strategic plans in respect of product enhancement and sales growth, and we continued to strategically invest in technology which will support future increases in business volumes without significantly increasing costs. As part of a wider group reorganisation, the Company entered into distribution and services agreements with its sister company Acorn Brokerage Limited, trading as Ask Acorn during 2024, for the distribution of the protection, pension and investment products we manufacture and for the provision of other insurance services. We continued to improve our value for money proposition for our customers in 2024 by enhancing PRSA and Master Trust administration capabilities, enhancing our policy review process and re-pricing our protection offering. In 2025, we will be working on our funds proposition from an ESG perspective. We will continue to innovate so that we can add value to our customers, our people and the charities we support. New business sales were strong in 2024, and the Company delivered a profit before tax of €6.7 million (2023: €5.6 million). The profit for the year exceeded our projections and this was mainly due to exceptionally positive investment market performance. Our Free Capital was €30.9 million at the end of the year. As at 31 December 2024 the Company was adequately capitalised at 163% (2023: 181%) of its Solvency Capital Requirement (SCR). The Company had policyholders' assets under management of €1,241 million at 31 December 2024 (2023: €1,066 million). The Company is in a strong position to continue to progress its business strategy during 2025.

Key Information from the Solvency II Balance Sheet	**2024**	**2023**
	€'m	**€'m**
Eligible Own Funds	80.3	74.3
Minimum Capital Requirement (MCR)	12.4	10.3
Solvency Capital Requirement (SCR)	49.4	41.1
Ratio of Eligible Own Funds to MCR	650%	723%
Ratio of Eligible Own Funds to SCR	163%	181%

More information on the business and performance can be found in section A below.

System of Governance Summary

The Company has an effective system of governance, which provides for sound and prudent management. Its board continues to ensure that we maintain a strong corporate governance framework and risk management function.

The governance structure comprises of the board of directors, the chief executive officer, board risk committee, board audit committee and various management committees. Risk management, compliance, actuarial and internal audit are considered key functions with governance responsibilities to ensure the sound and prudent management of the business.

The risk management function is responsible for managing the Company's risks. The compliance function is responsible for ensuring that the Company complies with all relevant regulatory requirements. The actuarial function is responsible for ensuring that the Company sets aside enough funds to cover policyholders' claims and the expenses of the business. The internal audit function supports the board and management in discharging their responsibilities for the operation of internal controls and corporate governance.

The Company operates a three lines of defence model. The first line represents the various departments performing their regular duties. The second line sets control policies and undertakes monitoring and surveillance of business operations. The third line represents independent review.

More information on the system of governance can be found in section B below.

Risk Profile Summary

In the context of its business operations the Company enters into a broad variety of risks. These risks are deliberately accepted and monitored. They include underwriting risk, market risks, counterparty default risks and operational risks.

Underwriting risk is the risk of an increase in claims, expenses or lapses. Market risk is the risk of falls in the value of the Company's investments or falls in the value of policyholders' assets under management which could lead to a reduction in future income. Counterparty default risk is the risk of default of our counterparties, such as banks or reinsurers. Operational risk is the risk of direct or indirect losses arising from inadequate or failed internal process, people and systems or from external events.

For each of the risks, the Company has undertaken stress testing as part of its Own Risk and Solvency Assessment (ORSA). The outcome of the stress and scenario tests was that in each scenario we expect to have sufficient available capital to continue to meet the Solvency Capital Requirement (SCR) over the medium term.

We describe the cause of these risks and how we deal with them in Section C.

Valuation for Solvency Purposes Summary

Our assets comprise unit-linked investments, cash equivalents and other assets. We value our assets in accordance with Solvency II valuation requirements. Our liabilities consist of technical provisions and other liabilities. Technical provisions represent the amount of money that we set aside to ensure we can cover our liabilities to policyholders.

More information on the valuation of assets and liabilities can be found in section D below.

Capital Management Summary

As at 31 December 2024, the Company has a solvency coverage ratio of 163% (2023: 181%).

The solvency objective of the Company is to ensure that it maintains sufficient capital to meet its obligations to its policyholders and other stakeholders as liabilities fall due. This means that we must hold an appropriate amount and quality of capital to meet regulatory requirements. We also hold additional capital relevant to our business activities. A strong capital position enables us to continue to operate through periods of severe stress. We measure and calculate our Solvency Capital Requirement (SCR) using the Solvency II Standard Formula. Own Funds in the Solvency II balance sheet comprise the excess of assets over liabilities. Our Solvency Coverage Ratio represents the extent to which our Own Funds exceed our SCR. This is continuously monitored and assessed.

More information on the Company's capital can be found in section E below.

A. BUSINESS AND PERFORMANCE

A.1 Business

The Company is a private company limited by shares and authorised by the Central Bank of Ireland (CBI) to conduct business in the Republic of Ireland. The Company's material lines of business are unit linked protection, pension, savings and investment products. The ultimate parent undertaking of the group to which the Company belongs is Acorn Life Group Limited, a private company limited by shares. The Group headed up by Acorn Life Group Limited is also supervised by the CBI. The Company is the only insurance entity in this group. The group consists of the following companies:

Acorn Life Group Limited:	An investment holding company.
Tanis Limited:	An investment holding company.
Acorn Life DAC:	A regulated insurance firm.
Acorn Brokerage Limited:	A regulated insurance intermediary.
Orcan Limited:	An investment holding company.
Acorn Master Trustee DAC:	A company which carries out retirement benefit trustee activities.

The Company's registered and operating address is:

Acorn Life DAC
St Augustine Street
Galway

The CBI is responsible for the financial supervision of the Company:

Central Bank of Ireland
North Wall Quay
Dublin 1

The Company's independent auditor is:

PwC, Chartered Accountants and Statutory Audit Firm
1 Spencer Dock, North Wall Quay
Dublin 1

Shareholders and group companies are:

O'Connell family

100% ownership

Acorn Life Group Limited

Registration No: 454195 at NZI Plaza

St Augustine Street Galway

100% ownership

Tanis Limited

Registration No: NI338121 at A&L Goodbody, Northern Ireland, 42-46 Fountain Street, Belfast, BT1 5EF

100% ownership

Acorn Life DAC

Registration No: 128945 at NZI Plaza St Augustine Street Galway

Acorn Brokerage Limited

Registration No: 513124 at NZI Plaza St Augustine Street Galway

Orcan Limited

Registration No: 454031 at NZI Plaza St Augustine Street Galway

Acorn Master Trustee DAC

Registration No: 731271 at NZI Plaza St Augustine Street Galway

A.2 Underwriting Performance

We reported a profit on ordinary activities before tax during the year of €6.7 million (2023: €5.6 million). The profit for the year exceeded our projections and this was mainly due to exceptionally positive investment market performance.

The underwriting performance outlined in this section is on an FRS 102 and 103 (The Financial Reporting Standard applicable in the UK and Republic of Ireland) basis as the Company prepares its Financial Statements in accordance with these accounting standards.

The table below sets out our profit and loss account for the year ended 31 December 2024, as reported in our Financial Statements.

Year-ended 31 December	**2024**	**2023**
	€'000	**€'000**
Net insurance premiums written and earned	34,047	31,709
Other technical income, net of reinsurance	15,166	12,488
Investment return	168,452	107,843
Claims incurred, net of reinsurance	(26,050)	(22,458)
Changes in insurance liabilities	(18,465)	(11,830)
Investment return related to investment contract liabilities	(140,614)	(90,131)
Net operating expenses	(25,803)	(22,036)
Balance on the technical account - life assurance business	**6,733**	**5,585**

The Financial Statements record premiums and claims in respect of insurance business. The Solvency II QRTs record premiums and claims in respect of insurance and investment business. This results in differences between the premiums, claims and expenses reported in our Financial Statements compared to the information disclosed under Solvency II in QRT S.05.01.02. The following table is a summary of our premiums, claims and expenses split by Solvency II lines of business during the year. All business was written in the Republic of Ireland.

	2024			2023		
	Index-linked and unit linked insurance	Other life insurance	Total	Index-linked and unit linked insurance	Other life insurance	Total
	€'000	€'000	€'000	€'000	€'000	€'000
Net Premiums earned	**173,187**	**597**	**173,784**	137,220	553	137,773
Net claims incurred	**133,602**	**-**	**133,602**	83,912	-	83,912
Expenses incurred	**27,878**	**60**	**27,938**	24,580	60	24,640

A.3 Investment Performance

Our investments fall into the following main asset classes:

- Unit-linked funds
- Cash and Cash Equivalents

The following table summarises our investment performance by asset class.

Investment performance during 2024 and 2023 was primarily due to investment market conditions in both years.

Investment performance by asset class	2024	2023
	€'000	€'000
Investment funds	168,452	107,797
Other	-	46
Total	**168,452**	**107,843**

The Company has no investments in securitisation.

A.4 Performance of other activities

Other technical income

The Company's unit-linked business is classified as either investment business or insurance business in its Financial Statements, depending on the nature of the underlying contract. The Financial Statements record premiums and claims in respect of insurance business only. Fee income generated on investment contracts is recorded as other technical income in the Financial Statements.

Fee income relates to fees charged to investment contracts for contract administration services, investment management services, payment of benefits and other services related to the administration of investment contracts. Fees are recognised as revenue when the services are provided. The fees charged for the current and previous years are shown in the Financial Statements table in section A.2 above as other technical income.

The Company does not have material leasing arrangements.

A.5 Any other information

We are satisfied that there is no other material information that needs to be disclosed.

B. SYSTEM OF GOVERNANCE

B.1 General Information on the system of governance

B.1.1 Company Overview

As an insurance undertaking, we are subject to the corporate governance requirements for Insurance Undertakings 2015 issued by the CBI. We are classified as low impact under the CBI's risk-based framework of supervision (PRISM).

The governance structure in place in the Company includes clear allocation and segregation of duties. The board has primary responsibility for corporate governance within the Company. The Management team is responsible for ensuring that we operate in line with our policies. The Company is governed through a structure of committees. The responsibilities of our board, board sub committees, the chief executive officer, and management committees are outlined below.

Effective governance is achieved through the integration of the corporate governance framework, the risk management framework, and key functions.

B.1.2 Governance Structure

The governance structure comprises the board of directors, the chief executive officer, the executive leadership team and board and management sub-committees. There were no material changes in governance structures during 2024. Keith Butler resigned as a director during the year. Jennifer Loftus and Gerard Ryan were appointed as directors.

The Board of Directors as at 31 December 2024 is comprised of:

1. John Lyons (Independent Non-Executive, Chair)
2. Brian Neilan (Independent Non-Executive)
3. Anna Fitzgerald (Independent Non-Executive)
4. Brid Quigley (Independent Non-Executive)
5. Gerry O'Connell (Non-Executive)
6. Gerard Ryan (Chief Executive Officer)
7. Jennifer Loftus (Executive)

The Company Secretary is Sarah Whelan.

The role of the board is to organise and direct the affairs of the Company in a manner designed to further the Company's best interests, having regard to the interests of its shareholders, customers, and employees, while complying with its fiduciary duties to the Company and all other relevant legal and regulatory requirements, the Company's constitution, and relevant corporate governance standards. Board meetings are held at least quarterly in Ireland. The board is responsible for approving the overall strategic objectives of the Company and ensuring that it has the appropriate resources in place to meet those objectives. This approach ensures that the skills, expertise and experience of the directors are harnessed to best effect and that any major opportunities or challenges for the Company come before the Board for consideration and approval. The Company is committed to enhancing diversity at Board and Leadership levels, in line with regulatory expectations and best practices in corporate governance. Gender diversity contributes to stronger decision-making, and the Company continues to advance its diversity agenda in alignment with evolving corporate governance standards and stakeholder expectations. The board has overseen the development of an ESG policy which acknowledges that the Company has an important role to play in climate transition to a low carbon, more resource efficient and sustainable economy and has a responsibility to manage environmental, social and governance issues appropriately. The ESG policy sets out our ESG objectives and our approach to considering sustainability risks in our decision making throughout the business.

The board has established robust key functions across risk management, compliance, actuarial and internal audit. The board is satisfied that all such key functions are appropriately independent of business units and have adequate resources and authority to operate effectively.

The Chair leads the board, encourages open and challenging discussions and promotes effective communication between executive and non-executive directors.

The chief executive officer (CEO) has ultimate executive responsibility for the Company's operations, compliance and performance. The CEO serves as the main link between the board and the executive leadership team.

The executive leadership team is an executive management committee established by the CEO for the purpose of providing advice and making recommendations to the CEO in respect of the Company's operations.

The board has established a board risk committee, and a board audit committee, each chaired by an Independent Non-Executive Director.

Board Risk Committee (Chaired by Anna Fitzgerald)

The board risk committee is the forum for risk governance within the Company. It is responsible for providing oversight and advice to the board in relation to current and potential future risk exposures of the Company and future risk strategy. This advice includes recommending a risk management framework incorporating strategies, policies, risk appetites and risk indicators to the board for approval. The committee oversees the risk management function, which is managed on a daily basis by the chief risk officer (CRO).

Board Audit Committee (Chaired by Brian Neilan)

The purpose of the committee is to ensure that the inherent risks within the business are subject to an appropriate level of independent review and to give comfort to the board that the assets of the Company are being safeguarded and that integrity of data is not being compromised.

B.1.3 Key Functions

Risk management, compliance, actuarial and internal audit are key functions with governance responsibilities to ensure the sound and prudent management of the business.

B.1.3.1 Risk Management

The Company has a risk function, responsible for the oversight and management of risk in the business. The CRO leads the risk function. The CRO reports to the CEO and has a direct line of responsibility to the board through its risk committee. The risk function has the primary responsibility for designing the risk management framework that is applied by the Company in identifying, assessing, measuring, mitigating and monitoring risks. The risk function has independent oversight of risk management activities and acts as a second line of defence in the risk management framework.

More information on the risk function can be found in section B.3 below.

B.1.3.2 Compliance

The Company has a compliance function with responsibility for the oversight of compliance within the business. The head of compliance leads the compliance function. The compliance function reports to the board risk committee. It has an advisory, oversight and assurance role to ensure that the Company has the necessary systems and controls in place to ensure adherence to legal and regulatory requirements and that consumers' best interests are protected. The compliance function acts as a second line of defence in the risk management framework.

More information on the compliance function can be found in section B.4 below.

B.1.3.3 Actuarial

The Company has an actuarial function headed by the head of actuarial function (HoAF) which is responsible for coordinating the calculation of technical provisions, capital requirements and solvency coverage. The HoAF is responsible for reporting to the Board and the CBI in line with requirements under Solvency II and the Domestic Actuarial Regime and related governance requirements. The actuarial function prepares annual opinions on the technical provisions, underwriting policy, reinsurance and the Own Risk and Solvency Assessment (ORSA). The actuarial function acts as a second line of defence in the risk management framework.

More information on the Actuarial function can be found in section B.6 below.

B.1.3.4 Internal Audit

The internal audit function's role is to support the board and management in achieving strategic and operational objectives and in discharging its corporate governance responsibilities. It satisfies this purpose by providing the audit committee and the CEO with independent assurance as to whether adequate and effective risk management, governance and internal control procedures are in place and are functioning effectively in the business. Internal audit acts as the third line of defence in the risk management framework. The head of internal audit reports functionally to the board through the audit committee. The internal audit function is outsourced.

More information on the internal audit function is included in section B.5 below.

B.1.4 Remuneration Policy

The Company's remuneration policy is designed to support key business strategies and create a strong, performance-orientated environment. It is designed to attract, motivate and retain talented individuals who will contribute to the success of the Company and to provide clarity on the overall remuneration approach in the business.

The policy is also cognisant and reflective of obligations of all regulatory codes including but not limited to:

- Corporate Governance Requirements for Insurance Undertakings.

- Consumer Protection Code.
- Insurance Distribution Regulations.
- Solvency II Regulations.
- CBI guidelines on variable remuneration.
- The Sustainable Finance Disclosure Regulation.

The Company seeks to provide competitive salaries and to reward employees fairly. Base salary is the principal component of employee remuneration and is reviewed annually. The duties and responsibilities of each role determines the remuneration for the position along with the skills and experience of the person appointed to the position.

The Company's remuneration policy is:

- Established, implemented and maintained in line with the business and risk management strategy as approved by the board.
- Consistent with our risk profile, objectives, risk management practices.
- Reflective of the long-term interests and performance of the business, incorporating measures to avoid conflicts of interest.
- Designed not to promote risk taking which is not aligned with our risk appetite statement.

The Company operates bonus schemes for designated categories of employees. The schemes aim to reward employees for achieving personal and company success metrics. The terms of employee bonus schemes are approved by the board.

Employees are encouraged to join the Defined Contribution Pension Scheme where both the Company and employee contribute to the retirement fund. Contributions are based on base salaries and subject to relevant upper limits. Death in service benefits are also in place.

Remuneration for Independent Non-Executive Directors consists entirely of a fixed fee. Executive Directors participate in employee bonus schemes.

No dividends were paid in 2024 or 2023. There are no plans to pay dividends during 2025. There were no material transactions between the Company it's shareholder, members of the Board and persons who exercise significant influence over the business during 2024.

B.2 Fit and proper requirements

B.2.1 Fitness & Probity Policy

Any person performing a pre-approval-controlled function (a "PCF") or a controlled function (a "CF") must have a level of fitness and probity appropriate to the performance of their function. These fitness and probity standards require that such individuals must be competent, capable, honest, ethical, financially sound and act with integrity.

As a regulated entity, we are subject to Fitness and Probity (F&P) standards. Our F&P Policy sets out the due diligence structures, processes and procedures in place to ensure the initial and ongoing assessment of those operating in PCF and CF roles including directors, senior management and employees whose activities have a material impact on the business.

The Company operates robust recruitment and selection controls which ensure that it selects candidates that meet the F&P Standards. Candidates must be competent and capable, honest, ethical, act with integrity and be financially sound. These controls include screening of candidates and the assessment of completed fitness and probity questionnaires prior to their engagement. Candidates are screened for educational qualifications, work experience, conflicts of interest, bankruptcy, debt judgements and regulatory sanctions.

Our employment contract terms require continuing adherence to all regulatory standards. The Company requires that individuals in PCF and CF roles confirm annually in writing whether there have been any material changes to their circumstances which would impact their fitness or probity and that they agree to continue to abide by F&P standards. Individuals in PCF and certain CF roles are screened annually.

Where material changes are confirmed, the individual is asked to provide additional information and confirm if they are still able to carry out their role. Compliance, the executive leadership team, and the board, if appropriate, will review the case and confirm if the individual remains fit and proper. If this cannot be confirmed, the individual will cease carrying out their role.

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

B.3.1 Risk Management Framework

The risk management system includes the interaction of key components, which operate together as an integrated whole. The key components of the risk management system are outlined below.

Risk Universe

The Risk Universe is our categorisation and definition of the risks facing the business. It provides a common risk language, which is used across the business. Material risk categories are outlined within the risk management policy.

Risk Appetite

Risk appetite is the aggregate level and types of risk we are willing to assume within our risk capacity to achieve strategic objectives and business plans. It reflects our risk objectives and influences our culture and operating style. The risk appetite is determined by business strategy, risk management competencies and core values.

The risk appetite is proposed by the risk management function and is reviewed, challenged and approved by the board at least annually. The risk management process is designed to manage risk within the risk appetite. Risk appetite limits and trigger levels are integral to the strategic decision-making process, day-to-day business operations and risk management.

The risk appetite consists of a focused number of key measures which are used by the board and management to steer the business from a risk perspective. We use trigger levels to anticipate breaches of appetite and to initiate management action in advance of the breach occurring. These actions may include avoiding, controlling, transferring, or accepting risks.

A well-articulated risk appetite provides:

- A firm basis for risk input to strategic decisions.
- Clear guidance to management.
- Confidence for external stakeholders.
- More efficient use of our resources.
- A basis to apply a holistic enterprise approach to risk management.

Risk Policies

Risk management processes and the requirements of the risk management system are set out in the risk management policy and other polices which govern the material risks facing the business. Each material risk in the risk universe is covered by one of the risk policies. These have been written to provide clear guidance to all levels of staff on how material risks are managed.

Policies are ultimately owned at board level and executively owned at management level. There is no appetite for discretion to diverge from policy. Risk policies set out the principles to be followed to manage risk within acceptable limits. They establish monitoring and reporting requirements and describe consequences and escalation requirements of breaches. They drive risk management actions and address how we manage the business. The policies also link directly to the governance requirements of the Company. The application of the policies within the business is reviewed by the internal audit function.

Risk Identification

The risks that the business faces are identified and logged on the risk register. The risk identification process is carried out by individual risk owners and facilitated by the risk management function. The risk management function ensures that the risk identification process is refreshed on a regular basis. The business is also required to report risk incidents, and any emerging risks, to the risk management function. We appreciate that planned changes to products and business processes may affect the risk profile. Consequently, the business is required to analyse the risk of all proposed changes to products and business processes to ensure that any new risks are identified. There are several processes by which risks are identified and brought to the attention of the risk management function:

- Regular risk appetite review and risk identification exercises.
- Regular risk reporting.
- Clear risk reporting lines.
- The ORSA process; and
- Risk event reporting.

The Annual ORSA process

The ORSA is a continuous process which analyses the risks faced by the business and ensures that it is managed soundly and prudently. It identifies, assesses, and monitors current and future solvency needs considering the risks faced by the business. The aggregate impact of these risks is assessed during the ORSA process which is facilitated by the risk management function. The ORSA provides us with detailed information on the risks facing the business, the cost of assuming or mitigating the risks, the potential impact on the solvency position and whether the risks align with the Company's risk appetite. The ORSA process is an integral part of the business strategy.

The risks captured on the risk register are reviewed as part of the Own Solvency Needs (OSN) assessment to determine whether the risks facing the business are adequately covered by the Standard Formula approach to calculating our capital requirement. Stress testing and scenario analysis, used as part of the ORSA process, are important risk management tools. The board reviews and approves the ORSA report.

Risk Assessment and Measurement

Robust risk assessment and measurement is necessary to generate appropriate management information that enables informed decision-making. Our risk assessment and measurement methodologies form a key part of our policies and procedures. Each methodology explains how the measurement process works from the identification of a risk, through to the assessment of the risk, its quantification, and the assessment of the capital that should be set aside to mitigate the risk.

Key Risk Indicators (KRIs) and Key Risk Controls (KRCs) are monitored on a regular basis by the risk management function. If there are significant movements in the values of the parameters used for measuring risk, the risk management function instigates appropriate action by the business and its management team, within a fixed timeline. Risk management action may also be required if a material business change is anticipated.

Risk Control

The business has controls to manage its risks. Risk mitigants may reduce the likelihood and/or the impact of risks. Control effectiveness is taken into consideration while assessing and aggregating risks. Regular review and measurement of risk profiles contributes to the assessment of the amount of own solvency capital the business needs and/or if there is a need for additional risk controls.

The process of implementing control improvements is owned by the business, reviewed by the risk function, and overseen and directed by the board. Business change proposals require a risk analysis to be performed. The risk analysis will identify any control changes necessary to manage changes in risk profile resulting from business changes.

Risk Monitoring and Reporting

Each business area is responsible for operating the risk management system and reporting information on its adherence to the risk management function. The risk management function reviews and challenges the information provided and reports it to the board via the board risk committee together with the status of the control framework and the effectiveness of the risk management system. The internal audit function tests key controls and provides assurance over the control environment within the business including its risk management processes.

The Company has developed a suite of risk metrics and management information to facilitate and support effective risk management and decision-making at all levels of the business. The management information contains a mix of financial, risk and operational indicators to ensure that reporting is clear, consistent, and efficient. Reports aim to provide information that is appropriately balanced between predictive and historic data. Overall, there is an emphasis on analysis of forward-looking information. The Company monitors and reports on a comprehensive range of KRIs and KRCs which are outlined in the risk management policy.

Risk Management Function

The Risk Management Function has independent oversight of risk management activities and acts as a second line of defence in the risk management framework. The CRO leads the risk management function which maintains and monitors the effectiveness of the risk management policy and framework. The CRO has a direct line of responsibility to the board risk committee and board. The CRO also provides input, via the executive leadership team into ongoing business decisions, ensuring consistency with risk policies and any board escalation protocols.

The risk management function is responsible for providing direction, guidance and support to the business regarding risk management systems and ensuring that a consistent process is applied across the business for managing risk. It has the primary responsibility for designing the framework that is applied in identifying, assessing, measuring, mitigating and monitoring risks. The risk management function also undertakes independent monitoring of risk management systems and processes to assist assessments of the robustness of the risk management processes.

The risk management function:

- Assists the board and its risk committee, in the effective operation of the risk management system.
- Develops and implements an annual risk plan.
- Carries out the annual ORSA process, and any other ORSA processes required.
- Facilitates the process of setting the risk strategy and appetite of the Company.
- Facilitates the process by which the business identifies and assesses the risks it faces.
- Maintains a central repository of all risks facing the business along with corresponding controls and mitigation measures.
- Supports the business in developing and implementing risk policies, risk identification, monitoring and reporting.
- Ensures that risk policies and procedures are communicated throughout the business to foster the risk culture set out by the board.
- Ensures that the risk policies, procedures, and the risk governance framework are up to date and fit for purpose.
- Monitors the effectiveness of the risk management system by utilising key risk indicators and key risk controls.

- Monitors overall risk profile and reports to the board risk committee on risk exposures against risk appetite, key risk events and any emerging risks.
- Advises the board and board risk committee on risk management matters.
- Fulfils a stewardship role with respect to embedding risk culture within the business.

B.4 Internal control system

B.4.1 Internal Control Framework

The Company's internal control framework consists of a combination of elements which are described below. The board has overall responsibility for the system of internal control and for reviewing its effectiveness. The system is designed to manage the risk of failure to achieve business objectives and provides reasonable assurance against material misstatement or loss.

The key risk management and internal control system includes:

- skilled and experienced management and staff in line with fit and proper requirements.
- clear roles, responsibilities and reporting lines with performance linked to business objectives.
- an organisation structure with clearly defined lines of responsibility and authority.
- the maintenance of proper accounting records.
- a comprehensive system of financial control including forecasting and periodic financial reporting versus business plans.
- the risk committee of the board and the risk management framework comprising a risk function, a clearly stated risk appetite and a risk strategy supported by approved risk management policies and processes.
- the management risk committee whose main role includes reviewing and challenging key risk information and assisting the board risk committee in the discharge of its duties.
- the risk strategy, framework and appetite are articulated in a suite of policies covering all risk types and supported by detailed procedural documents.
- an ORSA linking to risk management, strategy and capital management.
- an internal audit function.
- a compliance function.
- a data protection officer.
- an audit committee whose formal terms of reference include responsibility for assessing the controls in place to mitigate risks.
- A remuneration committee (at group level) which ensures that the approach to remuneration is consistent with our risk profile, objectives, risk management practices.
- a disaster recovery framework.
- a business continuity framework.
- policies such as a corporate governance policy, fitness and probity policy and code of ethics.

B.4.1.1 Governance and Internal Control structures:

- The board is ultimately responsible for setting and overseeing the internal control framework.
- The board has delegated the responsibility for the establishment, review, and maintenance of the system of internal control to its risk and audit committees.

- The key control functions within the business provide guidance, set relevant policies and provide assurance on the internal control environment.

B.4.1.2 Three Lines of Defence:

The Company has adopted the three lines of defence approach to internal control as follows:

- The first line of defence is the business functions which carry out day-to-day operations.
- The second line of defence sets control policies and undertakes monitoring of business operations.
- The third line of defence undertakes independent monitoring and assurance activities.

B.4.1.3 Policies

A suite of policies is regularly approved by the board and implemented by the business functions. The policies set out the minimum standards with which the business must comply. The policies are implemented throughout the business via processes, procedures, and controls.

B.4.1.4 Training:

The Company provides relevant internal control training to all staff. This training includes but is not limited to:

- Understanding the importance of an adequate system of internal control.
- Roles and responsibilities in respect of internal controls.
- Reporting lines for any control deficiencies or failures.

B.4.1.5 Controls over Financial Reporting

The Company has a comprehensive set of accounting policies and internal accounting controls.

General accounting control activities include:

- A comprehensive set of accounting policies relating to the preparation of financial statements.
- Audit committee challenge and approval of key judgements and assumptions which are material to the annual financial statements.
- Regular financial reporting to the executive leadership team, audit committee and board.
- An appropriately qualified and skilled finance team operating under the supervision of experienced management who are compliant with fit and proper requirements.
- Appropriate financial and accounting software.
- Approvals, authorisations, reconciliations and other measures applicable to each business area.
- Physical controls to premises and assets.
- Access control to key financial data.
- Checks on agreed exposure limits.
- Appropriate segregation of duties.

B.4.1.6 Communication

Formal lines of communication ensure that staff report on:

- Control breaches.
- Control deficiencies.
- Fraudulent activities.

The Company endeavours to ensure quality, timely, accurate and complete reporting and encourages suggestions for improvements. Reporting lines are designed to enable functional managers to inform the risk management function, internal audit, compliance and actuarial functions of facts relevant to the performance of their duties.

B.4.1.7 Monitoring and Reporting

Monitoring and reporting mechanisms are in place in order to:

- Provide timely and relevant information relating to the internal control framework to assist management in decision-making processes.
- Report on the overall state of the internal controls; and
- Identify deficiencies in the system of internal control and rectify them in a timely manner.

Regular internal audits are conducted over the process of internal control by the internal audit function. In addition to the internal audit reviews, second line of defence testing is performed by the compliance and risk management functions to ensure compliance with relevant codes, policies, and regulatory requirements.

B.4.1.8 Compliance Function

The compliance function operates in the second line of defence and through the head of compliance it develops and implements the compliance framework which sets out how regulatory risk is managed. An annual compliance plan is developed by the head of compliance and approved by the board. The compliance function has the following roles and responsibilities:

- Ensures compliance with all relevant legislation.
- Ensures high standards of business quality.
- Promotes a culture of compliance.
- Identifies external requirements and trends.
- Advises the board and management of new and upcoming regulations.
- Issues policies and provides guidance on compliance related matters.
- Determines the need for new or revised compliance policies and supporting documentation.
- Acts as a business partner by providing strategic, transactional and day to day compliance advice and direction.
- Establishes a compliance universe of applicable legislation, regulation, codes and guidance and identifies areas within the business responsible for the operation of compliant processes and controls relevant to each requirement.
- Delivers appropriate compliance training and communications.
- Undertakes an annual programme of independent risk-based compliance monitoring and reporting.

- Maintains a log of breaches and errors.
- Organises the compliance committee and ensures it meets regularly and acts in accordance with its terms of reference.
- Ensures that all relevant personnel are trained on their obligations under anti-money laundering (AML) legislation.
- Assesses the adequacy of the measures adopted to prevent non-compliance.
- Ensures AML monitoring is reported to the board and compliance committees.

This is a non-exhaustive list of items that are conducted by the compliance function. From time to time the compliance function may also be involved in certain first line of defence projects. During the tenure of these projects, the compliance function will always ensure that the independence of the compliance function is not undermined. The compliance function will not be involved in any activities where the performance of tasks gives rise to potential conflicts of interest.

B.5 Internal Audit Function

The internal audit function is the third line of defence in the risk governance structure. Internal audit provides independent assurance to the board through the audit committee. The internal audit function is formally established through its charter, which is reviewed and approved by the audit committee at least annually. The internal audit charter prohibits the internal audit function from performing management activities. The role of head of internal audit is outsourced. This ensures the role is independent from other operational functions. Outsourcing ensures that the internal audit function has access to specialist technical areas in a cost-effective manner.

The internal audit function evaluates internal controls and the system of governance function in the business as well as our compliance with regulatory obligations, policies, and processes. It provides independent assurance about the quality of internal controls and administrative processes, and it makes continuous improvement and best practice recommendations.

The internal audit function reports on the relevant audit items to the audit committee. A standing item at board meetings is an update from the chair of the audit committee.

B.6 Actuarial Function

The Company has an actuarial function which is part of the second line of defence and headed by the HoAF. The responsibilities of the actuarial function include:

- Calculation of Best Estimate Technical Provisions and Solvency Capital Requirement.
- Reporting to the board and the CBI in line with requirements under Solvency II and the Domestic Actuarial Regime and related governance requirements.
- Providing an annual opinion on the ORSA, underwriting and reinsurance arrangements.
- Completing cash-flow and capital modelling.
- Consideration of policyholder reasonable expectations (PRE).

B.7 Outsourcing

The Company outsources some activities to service providers to assist in achieving strategic objectives and delivering a high level of service to customers. The Company has an outsourcing policy which sets out how we identify and justify outsourcing risks and costs and implement outsourcing arrangements. It provides clear definitions of outsourcing and the criticality of outsourced activities. Outsourcing involves transferring responsibility for carrying out an activity to an outsourcing provider for an agreed charge. The outsourcer provides services based on an agreed contract. The Company retains responsibility for discharging its obligations.

The outsourcing policy specifies the contractual controls that must be in place with outsourcing providers to mitigate potential risks. The benefits of outsourcing must be balanced against the risks. This policy assists us in choosing the right outsourcing provider, ensuring that the Solvency II requirements on outsourcing are complied with, assessing the risks, ensuring risk appetite alignment, identifying the benefits of outsourcing, carrying out appropriate due diligence, setting service level agreements and forming a contract so that a successful partnership will prevail.

The outsourcing arrangements in place are regularly monitored and reviewed in line with the policy and the board approves all critical or important outsourcing arrangements. The CBI is notified of proposals to outsource critical or important activities.

The Company has put in place the following critical and important outsourcing arrangements:

Outsourced Activity	**Jurisdiction of Outsourcing Provider**	**Internal Owner**
Custodian Services	France and Ireland	Head of Investment
Asset Management	United Kingdom and Ireland	Head of Investment
Unit Trust administration services and Pensioner Trustee services for Self-Directed Pension contracts	Ireland	Chief Accounting Officer
Tele Interviewing	United Kingdom	Head of Claims
Internal Audit	Ireland	Chief Accounting Officer
Printing, packing, and posting of correspondence	Ireland	Chief Operating Officer
Cloud hosting of the electronic point of sale system	Ireland	Chief Information Officer

B8. Assessment of governance and any other disclosures

The Company is satisfied of its compliance with Corporate Governance Requirements for Insurance Undertakings and has concluded that it provides for sound and prudent management proportionate to the nature, scale and complexity of its operations.

The board is ultimately responsible for the oversight of climate related risks as they pertain to the business. The board has responsibility for oversight of climate related risk and for monitoring and mitigating this risk. An ESG committee reports to the board through the executive leadership team. The ESG committee meets regularly and is tasked with driving the ESG agenda across the Company. The committee is comprised of key personnel from across the business. Relevant departments are required to implement strategy for climate risk management supported by reliable metrics. The risk and compliance functions are represented on the ESG committee, and they are the second line functions which monitor and oversee the implementation and integration of sustainability initiatives in the business.

We are satisfied that there is no other material information that needs to be disclosed.

C. RISK PROFILE

The following is a summary of the Gross SCR:

	SCR Amount	SCR %	SCR Amount	SCR %
	2024		2023	
Underwriting Risk	**€36.7m**	**52.6%**	€34.3m	57.6%
Market Risk	**€29.5m**	**42.3%**	€21.4m	35.9%
Counterparty Risk	**€2.1m**	**3.0%**	€2.4m	4.0%
Operational Risk	**€1.5m**	**2.1%**	€1.4m	2.5%
Gross Solvency Capital Requirement	**€69.8m**	**100%**	€59.5m	100%

C.1 Underwriting risk

C.1.1 RISK EXPOSURE

Underwriting risk relates to uncertainty about the occurrence, amount or timing of insurance claims and risk income, or of adverse change in the value of insurance liabilities, resulting from changes in the level, trend, or volatility of insurance risk drivers. The Company is in the business of accepting mortality and morbidity risk, and it takes a cautious approach to managing underwriting risk through product design and the use of reinsurance to minimise solvency risk and profit volatility. The material product lines, and the risks associated with them are summarised in the table below:

Product Type	Risk Exposure
Protection Life Plan	• Mortality risk • Morbidity risk • Expense risk • Lapse risk • Market risk
Mortgage Protection	• Mortality risk • Lapse risk • Expense risk
Pensions and PRSA's	• Expense risk • Lapse risk • Market risk
Savings and Investments	• Expense risk • Lapse risk • Market risk

Mortality Risk

The Company is exposed to the risk of mortality being higher than expected. This can arise through adverse experience trends, anti-selection, catastrophe, or risk concentrations. Mortality experience in recent years has seen some volatility in mortality claims. However, the long-term trend has remained relatively stable.

Morbidity Risk

The Company is exposed to the risk that illness experience is worse than expected on the following benefits:

- Critical illness cover
- Hospital cash cover
- Surgical cash cover
- Accidental injury cover
- Personal accident cover
- Waiver of premium benefit

Morbidity experience in recent years has seen some volatility in morbidity claims. However, the long-term trend has remained relatively stable.

Lapse Risk

The Company is exposed to a risk of lapses being higher or lower than expected, as well as the possibility of a once off lapse event. High lapses do not significantly affect solvency in the short-term however high lapses could reduce profits emerging over the longer-term which would have an adverse impact on solvency over time. The long-term trend has remained relatively stable.

Expense Risk

Charges deducted from policies aim to cover expenses incurred in running the business. Much of our cost base is relatively fixed, so delivering the best value to our customers is dependent on having enough policies in force.

The Company does not use special purpose vehicles as described under Article 211 of Solvency II Directive.

C.1.2 RISK CONCENTRATION

Our business strategy of distributing our products through a network of tied agents within the Irish market incorporates an element of concentration risk. However, concentrations of risk are continuously monitored, and the Company is satisfied that it is not exposed to excessive concentrations of risk.

C.1.3 RISK MITIGATION

Risk Monitoring

It is the responsibility of the HoAF, with support from other areas of the business to monitor the principal risk factors which will influence the profitability of business written in the future. The HoAF monitors these factors on a regular basis and gives an annual opinion on underwriting as part of the Actuarial Function Report. Profitability is monitored regularly through monthly experience investigations.

C.1.3.1. The Underwriting Process

The Underwriting process is the primary method by which mortality and morbidity risks are mitigated.

- Our policy is to follow the underwriting philosophy of our reinsurers when underwriting policies covered by our reinsurance agreements.
- The head of underwriting ensures that the underwriting manual mitigates the risk of anti-selection.
- The head of underwriting ensures that sufficient training takes place for underwriters on the use of the reinsurer's underwriting manual.
- Underwriters must maintain membership of an appropriate professional body and engage in continued professional development.

C.1.3.2 The Claims Process

- The Company maintains a claims management manual which sets out the claims management process in detail.
- The head of claims ensures that claim handlers have received sufficient training to use the claims manual.
- Changes to the claims management manual are approved by the head of claims.
- Changes to the claims philosophy are agreed with our reinsurers.

C.1.3.3. Reinsurance

Reinsurance is in place to cover a proportion of sums assured on death, critical illness, and accidental death benefits. Reinsurance is a key risk management tool which reduces the volatility of cash flows by transferring risk to a third party. The primary objectives of the reinsurance strategy are as follows:

- Reduce the volatility of cash flows, own funds and solvency capital requirement.
- Manage exposure to individual lives.
- Manage capacity to write new business.
- Support the pricing of new business and product design process.
- Support the underwriting and claims management processes.

The Company reinsures sums at risk with two reinsurers. Both reinsurers have at least an A rating in line with our risk appetite. Credit risk associated with both reinsurers is low.

C.1.4 RISK SENSITIVITY

As part of the ORSA process in 2024, underwriting stresses were tested. These included expenses, claims and lapse stresses. Other scenarios which assessed a combination of these stresses were also tested. This involved the recalculation of the projected solvency coverage under a stressed scenario to determine if the Company would have sufficient own funds to cover its SCR in the future. Our projected solvency coverage remained resilient in the stressed scenarios considered.

C.1.5 Dependencies between risk modules

The Company uses the correlations specified for the Solvency II Standard formula to determine dependencies across underwriting risks and between these and other risks. The Company's insurance risk profile does not exhibit any unique features which would suggest that the correlation between sub-modules would be any lower than suggested by the Standard formula.

C.1.6 Any other information regarding the underwriting risk profile

We are satisfied that there is no other material information that needs to be disclosed.

C.2 Market risk

C.2.1 RISK EXPOSURE

Market risk arises from the level or volatility of market prices of financial instruments. Exposure to market risk is measured by the impact of movements in the level of financial variables such as stock prices, interest rates, immovable property prices and exchange rates. Market risk SCR is made up of equity, currency, spread, interest rate and property risk SCRs. The Company pursues a policy of matching policyholder liabilities and has no appetite for mismatching of policyholder unit liabilities. Shareholder funds are predominantly invested in liquid assets. The Company's head office building is its only direct property investment, and it has a limited appetite for direct property investment.

Equity Risk SCR: The income generated through unit related charges on policyholder funds makes this SCR significant. However, the net impact of the equity SCR on free capital is not material due to the presence of a corresponding asset representing the present value of future profits including charges levied on policyholders' equity exposures.

Currency Risk SCR: The Company is indirectly exposed to currency risk through management charge margins generated on policyholder assets. The net impact of the currency SCR on free capital is not material due to the presence of a corresponding asset representing the present value of future profits including charges levied on policyholders' currency exposures.

Spread and Interest Rate Risk: The Company is directly exposed to spread and interest rate risk through its investments in debt securities with an indirect exposure through policyholder assets. The Company reviews its exposure to interest rate and spread risk regularly by conducting an asset liability matching analysis.

Property Risk: is generated in respect of the head office property and not material.

Investments are made in accordance with the Prudent Person Principle giving due regard to the security, quality, liquidity, sustainability and profitability of individual investments and the overall portfolio. Investment is limited to certain asset classes and internal risk limits. Tolerance levels have been calibrated to ensure the Company achieves the desired portfolio profile.

C.2.2 RISK CONCENTRATION

The Company is potentially exposed to concentration risk via its cash positions at banks. The exposure to any single bank is limited which reduces the exposure.

C.2.3 RISK MITIGATION

The Company has board approved policies for investment and market risk management, asset and liability management and liquidity risk management and it monitors its exposure to market risk in line with these policies. The Company has established market risk limits with respect to the investment portfolio.

Equity risk: the Company has limited appetite to invest shareholders assets directly in equities. The Company has a policy in respect of exposure to equity risk through unit fund mismatches and the shareholder is exposed to equity risk indirectly through management charge margins generated on policyholder assets.

Currency risk: the Company has no appetite to invest shareholder assets directly in foreign currency. The Company has a policy in respect of exposure to currency risk through unit fund mismatches. It is accepted that the shareholder is exposed to currency risk indirectly through management charge margins generated on policyholder assets.

Credit spread risk: the shareholder's appetite for credit spread risk is defined in respect of debt securities and unit fund mismatches. It is accepted that the shareholder is exposed to credit spread risk indirectly through management charge margins generated by policyholder assets.

Interest rate risk: the shareholder's appetite for interest rate risk is defined in respect of debt securities and unit fund mismatches. It is accepted that the shareholder is also exposed to interest rate risk indirectly through management charge margins generated on policyholder assets.

Valuation Policy

Shareholder assets are generally not invested in complex products that are difficult to value and there is a valuation source for each asset class in the investment portfolio.

C.2.4 RISK SENSITIVITY

Market risk stresses and sensitivity tests are carried out annually through the ORSA process. As part of the ORSA process in 2024, several market stresses were tested including scenarios which had a combination of stresses. Our projected solvency coverage remained resilient in the stressed scenarios considered.

C.2.5 Dependencies between risk modules

The Company uses the correlations specified for the Solvency II Standard formula to determine dependencies across market risks and between these and other risks. The Company's specific market risk exposures do not exhibit any unique fixtures which merit a heightened correlation allowance between market risk sub-modules.

C.2.6 Any other information regarding the market risk profile

We are satisfied that there is no other material information that needs to be disclosed.

C.3 Credit risk

C.3.1 RISK EXPOSURE

Credit (Counterparty) risk is the risk of financial loss arising from a counterparty which fails to meet its obligations in accordance with agreed terms. Exposure to this risk occurs any time funds are extended, committed or invested though actual or implied contractual agreements. The Company's exposure to credit risk is predominantly related to its reinsurance protection and financial assets.

Reinsurance: The Company purchases reinsurance protection to limit its exposure to claims. The Company only places reinsurance with companies that it believes are strong financially and operationally. Credit exposures to these companies are closely monitored. Both reinsurers have a Moody's credit-rating of at least A. The Company has assessed these credit ratings and security as being satisfactory in diminishing its exposure to the associated credit risk.

Financial Assets: The extent of the exposure to credit risk from financial assets is managed by the formulation of, and adherence to, an investment policy incorporating clearly defined investment limits and rules, as approved by the board. The Company employs appropriately qualified, experienced personnel and external investment management specialists to manage the investment portfolio. The overriding philosophy of the investment policy is to protect and safeguard the Company's assets and to ensure its capacity to underwrite is not put at risk.

C.3.2 RISK CONCENTRATION

Reinsurance of mortality and critical illness sums insured are concentrated with one of our reinsurers. This exposure represents a concentration risk. The Company is confident that alternative reinsurance arrangements would be available if the reinsurer withdrew from the market or increased its prices. The Company also has the option to cease or reduce the level of reinsurance. The investment policy and risk appetite statement set out clear limits with respect to concentrations of investments and deposits.

C.3.3 RISK MITIGATION

The risk appetite statement sets out limits on reinsurers' credit ratings to limit credit risk. There are limits on the amount that can be deposited with a single bank and on the ratings of banks that the Company will deal with. The Company limits its exposure to single banks by investing in short duration bond funds.

C.3.4 RISK SENSITIVITY

As part of the ORSA process in 2024, a number of counterparty stresses were tested. Our projected solvency coverage remained resilient in the stressed scenarios considered.

C.3.5 Dependencies between risk modules

The Company uses the correlations specified for the Solvency II Standard formula to determine dependencies between counterparty risks and between counterparty and other risks.

C.3.6 Any other information regarding the credit risk profile

We are satisfied that there is no other material information that needs to be disclosed.

C.4 Liquidity risk

C.4.1 RISK EXPOSURE

Liquidity risk is the risk that the Company does not have sufficient financial resources to meet its obligations as they fall due. On 31 December 2024, most of the Company's assets held in order to meet its liabilities and solvency capital requirement (SCR) were held in liquid investments.

The Company is exposed to liquidity risk because of its business operations. This includes timing mismatches between policyholder obligations and claims and reinsurance recoveries as well as cash-flow obligations arising from operating expenses, taxation, and other liabilities. The Company's exposure to liquidity risk did not materially change during 2024.

The Company has a limited appetite for liquidity risk and seeks to mitigate it via:

- maintaining of a portfolio of liquid assets to ensure that sufficient financial resources are available to meet obligations as they fall due.
- active management of reinsurance arrangements to recover claims paid; and
- access to bank borrowing facilities.

The Company is exposed to a general liquidity risk due to the administrative delay between the payment of claims and the recovery of associated reinsurance. Active management of amounts due from reinsurers allows us to address delays in the recovery of reinsurance. The Company is satisfied that reinsurance balances are settled in a timely fashion and that balances outstanding are in line with the risk appetite statement. The delay between the payment of large claims and recovery of the reinsured portion poses a liquidity risk. Large claims are flagged through the risk management framework and cash is set aside in advance of payment to minimise the liquidity risk.

In line with the Solvency II Prudent Person Principle, the Company's approach to managing liquidity is to ensure, as far as possible, that it will always have sufficient liquidity to meet its liabilities as they fall due under both normal and stressed conditions without incurring losses or risking damage to the Company's reputation.

C.4.2 RISK CONCENTRATION

Liquidity risk concentration can occur in several different ways, but we do not believe that we have material liquidity risk concentrations.

C.4.3 RISK MITIGATION

Free Capital (own funds in excess of those required to meet the solvency capital requirement) is backed entirely by qualifying liquid assets as defined in our liquidity risk management Policy.

In managing and/or mitigating liquidity risk the Company:

- invests in, and maintains a portfolio of, liquid assets in accordance with permissions and limits as defined in the liquidity risk management and investment & market risk management policies.

- matches unit-linked liabilities with investments in unit-linked assets with identical duration and cash-flow profile.
- funds the redemption of customer investment liabilities by the redemption of the linked assets supporting the investment contract liability.
- notifies reinsurers of large claims when received to minimise the timeframe within which cash on reinsurance recoveries is received.

Liquidity risk monitoring and reporting

Liquidity planning is performed by the Company to determine cash-flow needs. The liquidity of the asset portfolio is subject to ongoing monitoring and reporting. The projected liquidity position of assets in excess of liabilities under each scenario examined in the ORSA is highlighted within the annual ORSA report.

Expected Profits in Future Premiums ("EPIFP")

EPIFP is the amount of profit arising from including future premiums in the calculation of the Company's technical provisions. The EPIFP is not liquid because it relates to future premiums. The EPIFP was €2.1 million at 31 December 2024 (2023: €1.7 million).

C.4.4 RISK SENSITIVITY

A meaningful liquidity stress is difficult to apply to a balance sheet with very healthy liquidity. The Company's free capital is held in liquid assets. Because of this, when the Company is adequately solvent, it also has a healthy liquidity position. The liquidity position is stressed under each of the scenarios in the ORSA with the level of liquid assets maintained in all scenarios in line with the regulatory free capital position.

C.4.5 Dependencies between risk modules

Given that liquidity is not a material risk, the Company does not model dependencies between liquidity risks and other risks.

C.4.6 Any other information regarding the liquidity risk profile

We are satisfied that there is no other material information that needs to be disclosed.

C.5 Operational risk

C.5.1 RISK EXPOSURE

Operational risk is the risk associated with a loss resulting from failed internal processes, human and system errors, fraud and the consequences of natural or man-made disasters such as terrorist attacks, fire, flood, earthquake and pandemics. The Company considers cyber security risk, outsourcing risk and business continuity risk as key operational risks. The Company accepts that some operational risk loss events will happen and has set a yearly tolerance for operational risk losses. The Company manages operational risk to an acceptable level, through a combination of sound corporate and risk governance, strong systems and controls, strong resource management and limit and tolerance structures.

C.5.2 RISK CONCENTRATION

Operational risks can occur in several different areas. There is no obvious concentration in a particular area.

C.5.3 RISK MITIGATION

Operational risks are mitigated by our internal control framework. The Company has a robust system in place which includes written procedures, risk limits and the controls required to implement, measure, monitor, maintain and report on all material operations.

The Company holds additional own solvency needs (OSN) capital for operational risks. The below table summarises some key operational risk areas and methods of mitigation.

Operational risk area	Mitigation measure
Claims and underwriting	Regular audits and experience investigations. Individual underwriter acceptance limits. Segregation of duties for processing, authorisation and payment of claims.
Systems	Robust business and continuity and disaster recovery plans. Business sign-off and peer reviews.
Unit pricing	Daily valuations. Strict processes, controls, peer reviews and checks.
Mis-selling	Sales agents are regulated by the Central Bank of Ireland and they are required to maintain appropriate professional qualifications.

C.5.4 RISK SENSITIVITY

Operational risks exposures are considered as part of the ORSA resulting in OSN capital being set aside.

C.5.5 Dependencies between risk modules

The Company uses the correlations specified for the Solvency II Standard formula to determine dependencies between operational and other risks.

C.5.6 Any other information regarding the operational risk profile

We are satisfied that there is no other material information that needs to be disclosed.

C.6 Other material risks

Combined Stresses

In addition to stressing each of the risks discussed above individually in the 2024 ORSA, the Company also examined several scenarios in which different stresses were combined. The 2024 ORSA results demonstrate satisfactory forward-looking solvency, liquidity and operational resilience positions under all scenarios. This provides us with a high level of certainty around the strength of our medium-term financial position.

Special Purpose Vehicles

The Company does not use Special Purpose Vehicles.

Cybersecurity

The risks associated with IT and Cybersecurity are a key area of focus for the Company given the potential to have serious implications for consumer protection, financial stability and the overall reputation of the Irish financial system. The Company recognises its responsibilities in relation to IT, cybersecurity governance and risk management and it places these among its top priorities. We continuously monitor for new threats or unusual events that may increase cyber risk. The Company is well placed to withstand such risks in the ever-changing world of technology. A Cyber Security Policy is in place and cyber risk is a standing agenda at management and board risk committee meetings.

Geopolitical Risks

Geopolitical risks can have adverse effects on global financial markets, which could in turn affect the income generated by management charge margins on policyholder assets in the future.

Environmental and Social Risks

This is the risk that Company fails to adequately address ESG, sustainability and climate change risks. We recognise that environmental degradation, social risk issues and climate change, may impact the long-term sustainability of the business. We also recognise an expectation of customers and other stakeholders that the firm will act in a responsible and sustainable manner. We aim to align our business strategy with our environmental, social and governance objectives and to integrate sustainability factors within our risk management framework. A climate change risk materiality assessment was performed as part of the ORSA process, we have put an ESG Committee in place and we have made a commitment to achieving carbon neutral status.

New and Emerging Risks

The Company monitors upstream regulatory developments through its risk management framework to ensure that it is prepared to assess and implement legislative developments as required. An emerging risk is a risk which may or may not develop, is difficult to quantify, may have a high loss potential and is marked by a degree of uncertainty.

The key areas of focus for the Company at present are:

- **Product design and development** is the top risk facing the Company at present. Good progress was made in implementing our product roadmap throughout 2024. In 2025 we will continue with the implementation of our plans to ensure ongoing IORP II compliance for our OMA pension business via our Master Trust or PRSA offering and we are working on a replacement solution for our Flexible Life Plan product.

- **Claims Level Risk** is another top risk facing the Company. During 2024, risk profits were lower than projected due to surgical cash claims.

- **Long-term sustainability:** Notwithstanding our very healthy solvency position at present, it is recognised that there is a need to continue to increase our scale to ensure that we can continue to deliver value for our customers in the future.

- **Upstream Regulatory Change:** As in prior years, we continue to acknowledge that regulatory change is ongoing, and we monitor upstream regulatory developments through our risk management framework and compliance function to ensure that we are prepared for all legislative developments and that they are assessed and implemented as required within our business. Some key areas of focus at present are:
    - Digital Operational Resilience Act (DORA)
    - Consumer Protection Code (CPC) Review
    - Corporate Sustainability Reporting Directive (CSRD); and
    - The Retail Investment Strategy (RIS).

C.7 Any Other Disclosure

We do not believe that there is any other information that needs to be disclosed.

D. VALUATION FOR SOLVENCY PURPOSES

D.1 Assets

With some exceptions as described below, the Company recognised and valued its assets for solvency purposes based on the valuation methods it used to prepare its Financial Statements, as provided for by Article 9 of Delegated Regulation (EU) 2015/35. Those methods are consistent with the Solvency II valuation rules which require that assets are valued at the amount for which they could be exchanged between knowledgeable and willing parties in an arm's length transaction.

Assets	2024 Irish GAAP Value €'000	2024 Solvency II Value €'000	2024 Variance €'000	2023 Irish GAAP Value €'000	2023 Solvency II Value €'000	2023 Variance €'000
Deferred Acquisition Costs	32,139	0	(32,139)	29,908	0	(29,908)
Pension benefit surplus	0	0	0	0	0	0
Property, plant and equipment held for own use	2,105	2,105	0	2,125	2,125	0
Financial Assets - Government bonds	0	0	0	0	0	0
Financial Assets - Corporate bonds	0	0	0	0	0	0
Assets held for index-linked and unit-linked contracts	1,241,237	1,241,237	0	1,065,760	1,065,760	0
Loans and mortgages	1,054	1,054	0	1,284	1,284	0
Reinsurance recoverables	20,461	387	(20,075)	19,059	(144)	(19,203)
Insurance and intermediaries receivables	384	384	0	358	358	0
Reinsurance receivables	0	6,915	6,915	0	4,790	4,790
Receivables (trade, not insurance)	720	720	0	831	831	0
Cash and cash equivalents	69,435	69,435	0	60,309	60,309	0
Any other assets, not elsewhere shown	0	0	0	0	0	0
Total assets	**1,367,535**	**1,322,237**	**(45,299)**	**1,179,635**	**1,135,313**	**(44,321)**

The financial statements have been prepared in line with FRS 102 and 103 on a going concern basis. This basis assumes that the Company will continue in operational existence for the foreseeable future. The annual Own Risk and Solvency Assessment (ORSA) process provides oversight and governance over the assessment of the Company's ability to continue as a going concern. The ORSA is the primary risk assessment process which identifies the business risks relating to events or conditions that, individually or collectively, may cast significant doubt on the Company's ability to continue as a going concern, assesses the significance of those risks, including the likelihood of their occurrence and their potential impact and describes how risks can be addressed or mitigated. The key message from the 2024 ORSA process was that the balance sheet remains resilient to future stressed scenarios and there is no material threat to solvency or liquidity over the medium term. Based on the directors' assessment of the Company's financial position, the directors have a reasonable expectation that the Company will have adequate resources to continue in operational existence for the foreseeable future. Accordingly, they continue to adopt the going concern basis in preparing the financial statements.

The differences between the Financial Statements valuations compared to the valuations under the Solvency II framework are as follows:

- **Deferred acquisition costs (DAC):** A DAC asset is recognised in the Financial Statements but is not recognised under Solvency II.
- **Reinsurance recoverable:** The Solvency II value is stated on a discounted best estimate basis. Reinsurance recoverable is not discounted in the Financial Statements valuation.
- **Reinsurance receivable** - part of the reinsurance recoverable in the Financial Statements relating to reinsurance which will be recovered in respect of claims that have been notified to the Company but have not been fully investigated is classified as a reinsurance receivable asset under the Solvency II framework.

The Company does not have a deferred tax asset on its Solvency II balance sheet, nor has it provided any guarantees. The Company does not have any material leasing arrangements.

D.2 Technical Provisions

Technical Provisions by material line of business

The technical provisions comprise the Best Estimate of the Liabilities ("BEL"), the Risk Margin, Gross Technical Provisions (calculated as a whole), related reinsurance and other technical provisions relating to policyholders. Technical Provisions are valued for solvency purposes in accordance with the Solvency II valuation rules which require liabilities to be valued at the amount for which they could be transferred, or settled, between knowledgeable and willing parties in an arm's length transaction. The tables below show the technical provisions at 31 December 2024 and 31 December 2023 by material line of business:

2024

Line of business	Gross best estimate liability	Risk Margin	Gross technical provisions (calculated as a whole)	Recoverables from reinsurance contracts and SPVs	Total technical provisions net of recoverables
€'000					
Unit-linked life	(50,401)	13,826	1,245,061	(2,162)	1,206,324
Non unit-linked life	(3,923)	363	0	1,775	(1,785)
Total	**(54,325)**	**14,189**	**1,245,061**	**(387)**	**1,204,539**

2023

Line of business	Gross best estimate liability	Risk Margin	Gross technical provisions (calculated as a whole)	Recoverables from reinsurance contracts and SPVs	Total technical provisions net of recoverables
€'000					
Unit-linked life	(48,210)	13,037	1,067,980	(702)	1,032,105
Non unit-linked life	(2,567)	289	0	846	(1,432)
Total	**(50,777)**	**13,326**	**1,067,980**	**144**	**1,030,673**

A. Gross Best Estimate Liability

The BEL is calculated using a gross premium valuation for all policies in-force at the valuation date. It is the prospective value of future expected cash-flows on a policy-by-policy basis. Future claims, investment growth, expenses and lapses are projected. Future premium income is projected for non-unit-linked business only. Future premium income is not projected for unit-linked business because of Solvency II contract boundary rules. Negative reserves are permitted. The BEL calculation allows for future management actions approved by the board.

Main assumptions

Claims assumptions

Claims rate assumptions take account of relevant reinsurance data and our own experience over a five-year period. Judgement is required to ensure that sufficient allowance is made for trends or factors which we expect to change.

Investment Growth Rate

The investment growth rate used to project future investment growth on unit-linked funds is derived from the risk-free rate specified by the Solvency II regulations. The Company used the rates as provided by European Insurance and Occupational Pensions Authority ("EIOPA").

Discount Rate

The risk-free interest rate used for discounting the projected cash flows in the technical provisions calculation is the EUR relevant risk-free structure as specified by the Solvency II regulations. The Company used the rates as provided by EIOPA. The Company did not use the matching adjustment or the volatility adjustment at 31 December 2024.

Expenses and Inflation

The expenses incurred in servicing the Company's insurance obligations consist of administration, claims management/handling and overhead expenses. The Company performs a regular expense analysis to allocate expenses between acquisition and renewal expenses. The best estimate expense assumptions are based on the results of this analysis. The assumption for expense inflation is based on the Company's best estimate of future inflation.

Lapse assumptions

Lapse assumptions are set with reference to the Company's actual experience over a relevant five-year period. Judgement is required to ensure that sufficient allowance is made for trends or factors which we expect to change.

Changes in Assumptions

The main change to assumptions over the 2024 financial year related to expenses, claims and lapse experience.

B. Risk Margin

The Risk Margin ensures that the technical provisions are equal to the amounts required to meet insurance obligations. The risk margin is calculated as the amount of capital needed to support the solvency capital requirement over the lifetime of the business at a prescribed cost of capital rate. In the calculation of the risk margin, future solvency capital requirements are estimated using appropriate risk drivers for each individual solvency capital requirement.

C. Gross Technical Provisions (calculated as a whole)

Gross Technical Provisions (calculated as a whole) consist of the unit-linked liability and other reserves relating to policyholders. The unit-linked liability is equal to the value of policyholder units plus the value of loyalty bonus units multiplied by the relevant fund valuation price at the valuation date. All of the unit-linked liability was matched by unit-linked assets at 31 December 2024.

D. Recoverable from reinsurance contracts and special purpose vehicles

The Company reinsures mortality and morbidity risk on a proportional basis with a maximum retention per life. It is split between two reinsurance counterparties depending on the type of cover. The reinsurance recoverable is the excess of projected future reinsurance recoveries over projected future reinsurance premiums payable.

The Company did not hold any investments in special purpose vehicles at 31 December 2024.

Uncertainty associated with the value of technical provisions

The key sources of uncertainty for the Company are future lapse rates, mortality rates, morbidity rates, interest rates and expense rates. A robust assumption setting process is followed to ensure the uncertainty is well understood.

Solvency II and FRS valuation differences of Technical Provisions by material line of business.

The table below compares the Solvency II valuation of gross technical provisions with the Irish GAAP valuation of technical provisions, split by line of business, at 31 December 2024.

	2024			2023		
	Irish GAAP Value	Solvency II Value	Variance	Irish GAAP Value	Solvency II Value	Variance
Valuation differences of Technical Provisions	€'000	€'000	€'000	€'000	€'000	€'000
Unit-linked technical provisions	144,243	1,208,486	(1,064,243)	129,134	1,032,807	(903,674)
Non-unit linked technical provisions	28,228	(3,560)	31,788	25,156	(2,278)	27,434
Investment contract liabilities	1,097,706	0	1,097,706	937,964	0	937,964
Total technical provisions	**1,270,177**	**1,204,925**	**65,252**	**1,092,254**	**1,030,529**	**61,724**

The main differences between the Solvency II and Financial Statement Technical Provisions are as follows:

- Solvency II technical provisions include unit-linked liabilities in respect of both insurance and investment contracts. Financial Statements technical provisions include unit-linked liabilities in respect of insurance contracts only. Unit linked liabilities in respect of investment contracts are classified as investment contract liabilities in the Financial Statements.
- Solvency II uses best estimate assumptions while the Financial Statements assumptions include margins for adverse deviation.
- The Solvency II technical provision policyholder fund unit-growth rate is specified by the relevant risk-free interest rate provided by EIOPA. In the Financial Statements the expected policyholder fund unit-growth rate is based on the expected return on the underlying assets in which our policyholder funds are invested, incorporating a margin for adverse deviation.
- The Solvency II technical provision discount rate is specified by the relevant risk-free interest rate provided by EIOPA. In the Financial Statements the discount rate is based on the expected return on the assets backing the technical provisions, incorporating a margin for adverse deviation.
- Solvency II permits negative technical provisions.
- Solvency II technical provisions include the risk margin.

The Company does not apply the matching adjustment referred to in Article 77b of Directive 2009/138/EC. The Company does not use the volatility adjustment referred to in Article 77d of Directive 2009/138/EC. The Company does not apply the transitional risk-free interest rate-term structure referred to Article 308c of Directive 2009/138/EC. The Company does not apply the transitional deduction referred to in Article 308d of Directive 2009/138/EC.

D.3 Other liabilities

As at 31 December 2024, the Company recorded the following classes of liabilities for the Solvency II Valuation and the Financial Statements:

Other Liabilities	2024 Irish GAAP Value €'000	2024 Solvency II Value €'000	2024 Variance €'000	2023 Irish GAAP Value €'000	2023 Solvency II Value €'000	2023 Variance €'000
Deferred tax liabilities	279	5,313	(5,034)	998	6,172	(5,173)
Insurance and intermediaries payables	21,880	21,880	0	17,083	17,083	0
Reinsurance payables	19	0	19	464	0	464
Payables (trade, not insurance)	9,786	9,786	0	7,226	7,226	0
Any other liabilities, not elsewhere shown	20,054	0	20,054	22,164	0	22,164
Total other liabilities	**52,017**	**36,978**	**15,039**	**47,936**	**30,481**	**17,455**

Deferred tax liabilities recognised on the Financial Statements relate to historic earned profits, on which the corporation tax liability has not yet fallen due. Deferred tax liabilities are higher under Solvency II reflecting the fact that the Company can take credit for future profits under Solvency II which are not allowed in the Financial Statements.

There is no difference between the Solvency II valuation and the Financial Statements valuation for reinsurance payables, however they are classified differently on the balance sheets as described in section D.1.

A deferred income liability is recognised in the Financial Statements but not recognised under the Solvency II framework.

All other liabilities are recognised and valued for Solvency II purposes on the same basis as the Financial Statements.

D.4 Alternative methods for valuation

The Company does not use any alternative valuation methods.

D.5 Any other information

We do not believe that there is any other information that needs to be disclosed.

E. CAPITAL MANAGEMENT

E.1 Own funds

The objective of own funds management is to maintain sufficient own funds to cover the MCR, SCR and Own Solvency Needs (OSN) requirements. Own funds are required to be of sufficient quality to meet the eligibility requirements in Article 82 of the Delegated Regulation. The solvency objective of the Company is to ensure that it maintains sufficient capital to meet its obligations to its policyholders and other stakeholders as liabilities fall due. The Company must hold an appropriate amount and quality of capital to meet regulatory requirements as well as additional capital relevant to its specific capital needs given its risk profile, financial condition, business model and strategy, overall complexity, sensitivity to changing conditions and other factors that may arise from time to time. A strong capital position enables the Company to continue to operate through periods of severe stress. The Company measures and calculates capital using the Standard Formula. The ratio of Own Funds to SCR is reviewed by the board and management committees on at least a quarterly basis. Responsibility for own funds management ultimately rests with the Company's board. As part of own funds management, the Company prepares ongoing solvency projections and reviews the structure of own funds and future requirements. The annual ORSA contains a five-year projection of funding requirements under a range of scenarios.

An analysis of own funds is set out in the table below:

	2024	**2023**
	€'000	**€'000**
Ordinary share capital	3,912	3,912
Share premium account related to ordinary share capital	507	507
Reconciliation reserve	75,211	69,181
Capital Contributions	703	703
Total basic own funds	**80,333**	**74,303**

The Company's ordinary share capital, share premium arising on ordinary share capital, reconciliation reserve and capital contributions received are all available as unrestricted Tier 1 items. The ordinary share capital, share premium arising, and capital contributions are immediately available to absorb losses and are fully subordinated to all other claims in the event of winding-up. The reconciliation reserve equals the excess of assets over liabilities less other basic own fund items at the reporting date. The Company's Solvency II liabilities include negative technical provisions meaning that the own funds include an amount representing the expected future profits which will be generated from current fund values on unit-linked business and future premiums on non-unit-linked business.

There were no material changes to how capital was managed during 2024. A detailed exercise to define and document the capital management plan for the Company over the medium term 2025-2029 was carried out during 2024. A Strategic Solvency Target (SST) for the Company that is appropriate to its nature, scale, ownership structure and risk profile was also established. The ORSA model is a key part of the process of developing the capital management plan.

The SST was set in line with the stated appetite of the board to have solvency capital above SCR plus OSN capital immediately after the occurrence of the risk events modelled in the ORSA. The SST is the reference point for strategy setting and is reviewed annually as part of the ORSA process.

The Company's own funds are Tier 1 unrestricted and available to cover the SCR and MCR. All own funds available to cover the SCR are unrestricted and fully available to absorb losses. There are no material terms and conditions that need to be disclosed.

The difference between equity as shown in the Financial Statements and the Solvency II excess of assets over liabilities comprises differences in the valuation of assets and liabilities, as set out in section D. Solvency II technical provisions are lower than in the Financial Statements due to the use of best estimate rather than prudent assumptions.

The Company does not make use of ancillary own funds or transitional arrangements.

The Company paid no dividends during 2024 or 2023. The Company has no dividend plans for 2025.

E.2 Solvency Capital Requirement and Minimum Capital requirement

The table below sets out the total SCR and MCR at 31 December 2024:

	2024	**2023**
	€'000	**€'000**
SCR	49,426	41,103
MCR	12,357	10,276

The required capital has been calculated based on the standard formula for Solvency II. The solvency and minimum capital requirements were always complied with during the year.

The following table shows the inputs into SCR calculation as at 31 December 2024:

	2024	2023
	€'000	**€'000**
Operational risk	1,485	1,454
Market risk	29,539	21,413
Underwriting risk	36,694	34,268
Counterparty risk	2,131	2,395
Diversification benefit	(15,109)	(12,556)
SCR gross of tax relief	**54,740**	**46,974**
Tax relief on SCR stresses	(5,314)	(5,871)
SCR net of tax relief	**49,426**	**41,103**

The table below shows the inputs into the MCR calculation as at 31 December 2024.

	2024	2023
	€'000	**€'000**
Absolute Floor	4,000	4,000
Linear MCR	10,252	9,034
SCR	49,426	41,103
Combined MCR	10,252	9,034
MCR	**12,357**	**10,276**

Approximations

In order to perform the SCR calculation as efficiently as possible at 31 December 2024, some approximations were necessary in the calculation of the market risk and underwriting risk SCR. We are satisfied that the use of approximations at 31 December 2024 did not materially impact the SCR calculation.

Loss Absorbing Capacity of Deferred Tax (LACDT)

LACDT under the Solvency II standard formula allows the Company to reflect the fact that a future loss in profits may also result in a reduction in associated tax liabilities. A reduction in tax liabilities would also reduce the impact that a future loss would have on future own funds. In practice this means that for the purposes of calculating its SCR, the Company can reduce its Gross SCR by deferred tax relief on SCR stresses. The Company's policy is to provide for a deferred tax liability in respect of its Solvency II Technical Provisions as well as timing differences related to the taxation of past profits when calculating its eligible own funds at each balance sheet date. The Company's policy is to recognise Deferred Tax Assets because of unused tax losses only to the extent that is it probable that they will be recovered against future taxable profits. The Company does not have a Deferred Tax Asset. The Company's policy in relation to LACDT is to restrict the tax related reduction to Gross

SCR under the standard formula to the amount of the net deferred tax liability on the balance sheet on the basis that it cannot justify loss absorbing capacity from other sources.

Material movements in MCR and SCR

The SCR and MCR both increased over the period. The primary reason for these movements is investment market performance during the year.

E.3 Use of the duration-based equity risk submodule in the calculation of the SCR

The Company does not use the duration-based equity risk submodule in the calculation of the SCR so this section is not relevant.

E.4 Difference between the standard formula and any internal model used

The Company does not use an internal model, partial internal model or undertaking specific parameters so this section is not relevant.

E.5 Non-compliance with the MCR and non-compliance with the SCR

The Company was always compliant with the MCR and SCR requirements during 2024.

E.6 Any other information

We do not believe that there is any other information that needs to be disclosed.

Appendix A: Public QRTs

Annex I

S.02.01.02

Balance sheet

		Solvency II value
Assets		**C0010**
Intangible assets	**R0030**	0
Deferred tax assets	**R0040**	0
Pension benefit surplus	**R0050**	0
Property, plant & equipement held for own use	**R0060**	2,105
Investments (other than assets held for index-linked and unit-linked contracts)	**R0070**	0
Property (other than for own use)	**R0080**	0
Holdings in related undertakings, including participations	**R0090**	0
Equities	**R0100**	0
Equities - listed	**R0110**	0
Equities - unlisted	**R0120**	0
Bonds	**R0130**	0
Government Bonds	**R0140**	0
Corporate Bonds	**R0150**	0
Structured notes	**R0160**	0
Collateralised securities	**R0170**	0
Collective Investments Undertakings	**R0180**	0
Derivatives	**R0190**	0
Deposits other than cash equivalents	**R0200**	0
Other investments	**R0210**	0
Assets held for index-linked and unit-linked contracts	**R0220**	1,241,237
Loans and mortgages	**R0230**	1,054
Loans on policies	**R0240**	0
Loans and mortgages to individuals	**R0250**	1,054
Other loans and mortgages	**R0260**	0
Reinsurance recoverables from:	**R0270**	387
Non-life and health similar to non-life	**R0280**	0
Non-life excluding health	**R0290**	0
Health similar to non-life	**R0300**	0
Life and health similar to life, excluding health and index-linked and unit-linked	**R0310**	-1,775
Health similar to life	**R0320**	0
Life excluding health and index-linked and unit-linked	**R0330**	-1,775
Life index-linked and unit-linked	**R0340**	2,162
Deposits to cedants	**R0350**	0
Insurance and intermediaries receivables	**R0360**	384
Reinsurance receivables	**R0370**	6,915
Receivables (trade, not insurance)	**R0380**	720
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**	69,435
Any other assets, not elsewhere shown	**R0420**	0
Total assets	**R0500**	1,322,237

Liabilities		Solvency II value C0010
Technical provisions – non-life	R0510	0
Technical provisions – non-life (excluding health)	R0520	0
TP calculated as a whole	R0530	0
Best Estimate	R0540	0
Risk margin	R0550	0
Technical provisions - health (similar to non-life)	R0560	0
TP calculated as a whole	R0570	0
Best Estimate	R0580	0
Risk margin	R0590	0
Technical provisions - life (excluding index-linked and unit-linked)	R0600	-3,560
Technical provisions - health (similar to life)	R0610	0
TP 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	-3,560
TP calculated as a whole	R0660	0
Best Estimate	R0670	-3,923
Risk margin	R0680	363
Technical provisions – index-linked and unit-linked	R0690	1,208,486
TP calculated as a whole	R0700	1,245,061
Best Estimate	R0710	-50,401
Risk margin	R0720	13,826
Contingent liabilities	R0740	0
Provisions other than technical provisions	R0750	0
Pension benefit obligations	R0760	0
Deposits from reinsurers	R0770	0
Deferred tax liabilities	R0780	5,313
Derivatives	R0790	0
Debts owed to credit institutions	R0800	0
Financial liabilities other than debts owed to credit institutions	R0810	0
Insurance & intermediaries payables	R0820	21,880
Reinsurance payables	R0830	0
Payables (trade, not insurance)	R0840	9,786
Subordinated liabilities	R0850	0
Subordinated liabilities not in BOF	R0860	0
Subordinated liabilities in BOF	R0870	0
Any other liabilities, not elsewhere shown	R0880	0
Total liabilities	R0900	1,241,904
Excess of assets over liabilities	R1000	80,333

S.05.01.02
Premiums, claims and expenses by line of business

		Line of Business for: **life insurance obligations**						**Life reinsurance obligations**		Total
		Health insurance	Insurance with profit participation	Index-linked and unit-linked insurance	Other life insurance	Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations	Health reinsurance	Life reinsurance	
		C0210	**C0220**	**C0230**	**C0240**	**C0250**	**C0260**	**C0270**	**C0280**	**C0300**
Premiums written										
Gross	**R1410**	0	0	186,822	1,121	0	0	0	0	187,942
Reinsurers' share	**R1420**	0	0	13,635	524	0	0	0	0	14,159
Net	**R1500**	0	0	173,187	597	0	0	0	0	173,784
Premiums earned										
Gross	**R1510**	0	0	186,822	1,121	0	0	0	0	187,942
Reinsurers' share	**R1520**	0	0	13,635	524	0	0	0	0	14,159
Net	**R1600**	0	0	173,187	597	0	0	0	0	173,784
Claims incurred										
Gross	**R1610**	0	0	146,697	0	0	0	0	0	146,697
Reinsurers' share	**R1620**	0	0	13,095	0	0	0	0	0	13,095
Net	**R1700**	0	0	133,602	0	0	0	0	0	133,602
Changes in other technical provisions										
Gross	**R1710**	0	0	0	0	0	0	0	0	0
Reinsurers' share	**R1720**	0	0	0	0	0	0	0	0	0
Net	**R1800**	0	0	0	0	0	0	0	0	0
Expenses incurred	**R1900**	0	0	27,878	60	0	0	0	0	27,938
Other expenses	**R2500**									0
Total expenses	**R2600**									27,938

S.05.02.01

Premiums, claims and expenses by country

		Home Country	Top 5 countries (by amount of gross premiums written) - life obligations					Total Top 5 and home country
		C0150	C0160	C0170	C0180	C0190	C0200	C0210
	R1400							
		C0220	C0230	C0240	C0250	C0260	C0270	C0280
Premiums written								
Gross	R1410	187,942	0	0	0	0	0	187,942
Reinsurers' share	R1420	14,159	0	0	0	0	0	14,159
Net	R1500	173,784	0	0	0	0	0	173,784
Premiums earned								
Gross	R1510	187,942	0	0	0	0	0	187,942
Reinsurers' share	R1520	14,159	0	0	0	0	0	14,159
Net	R1600	173,784	0	0	0	0	0	173,784
Claims incurred								
Gross	R1610	146,697	0	0	0	0	0	146,697
Reinsurers' share	R1620	13,095	0	0	0	0	0	13,095
Net	R1700	133,602	0	0	0	0	0	133,602
Changes in other technical provisions								
Gross	R1710	0	0	0	0	0	0	0
Reinsurers' share	R1720	0	0	0	0	0	0	0
Net	R1800	0	0	0	0	0	0	0
Expenses incurred	R1900	27,938	0	0	0	0	0	27,938
Other expenses	R2500							0
Total expenses	R2600							27,938

S.12.01.02

Life and Health SLT Technical Provisions

		Insurance with profit participation	Index-linked and unit-linked insurance			Other life insurance			Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance	Accepted reinsurance	**Total (Life other than health insurance, incl. Unit-Linked)**
				Contracts without options and guarantees	Contracts with options or guarantees		Contracts without options and guarantees	Contracts with options or guarantees			
		C0020	**C0030**	**C0040**	**C0050**	**C0060**	**C0070**	**C0080**	**C0090**	**C0100**	**C0150**
Technical provisions calculated as a whole	**R0010**	0	1,245,061			0			0	0	1,245,061
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole	**R0020**	0	0			0			0	0	0
Technical provisions calculated as a sum of BE and RM											
Best Estimate											
Gross Best Estimate	**R0030**	0		-50,401	0		-3,923	0	0	0	-54,325
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	**R0080**	0		2,162	0		-1,775	0	0	0	387
Best estimate minus recoverables from reinsurance/SPV and Finite Re - total	**R0090**	0		-52,563	0		-2,148	0	0	0	-54,711
Risk Margin	**R0100**	0	13,826			363			0	0	14,189
Amount of the transitional on Technical Provisions											
Technical Provisions calculated as a whole	**R0110**	0	0			0			0	0	0
Best estimate	**R0120**	0		0	0		0	0	0	0	0
Risk margin	**R0130**	0	0			0			0	0	0
Technical provisions - total	**R0200**	0	1,208,486			-3,560			0	0	1,204,925

S.23.01.01 Own funds

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation (EU) 2015/35						
Ordinary share capital (gross of own shares)	R0010	3,912	3,912		0	
Share premium account related to ordinary share capital	R0030	507	507		0	
Iinitial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040	703	703		0	
Subordinated mutual member accounts	R0050	0		0	0	0
Surplus funds	R0070	0				
Preference shares	R0090	0		0	0	0
Share premium account related to preference shares	R0110	0		0	0	0
Reconciliation reserve	R0130	75,210	75,210			
Subordinated liabilities	R0140	0		0	0	0
An amount equal to the value of net deferred tax assets	R0160	0				0
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180	0	0	0	0	0
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds						
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220	0				
Deductions						
Deductions for participations in financial and credit institutions	R0230	0	0	0	0	
Total basic own funds after deductions	R0290	80,333	80,333	0	0	0
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300	0			0	
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310	0			0	
Unpaid and uncalled preference shares callable on demand	R0320	0			0	0
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330	0			0	0
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340	0			0	
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350	0			0	0
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360	0			0	
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370	0			0	0
Other ancillary own funds	R0390	0			0	0
Total ancillary own funds	R0400	0			0	0
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	80,333	80,333	0	0	0
Total available own funds to meet the MCR	R0510	80,333	80,333	0	0	
Total eligible own funds to meet the SCR	R0540	80,333	80,333	0	0	0
Total eligible own funds to meet the MCR	R0550	80,333	80,333	0	0	
SCR	R0580	49,426				
MCR	R0600	12,357				
Ratio of Eligible own funds to SCR	R0620	163%				
Ratio of Eligible own funds to MCR	R0640	650%				

		C0060	
Reconciliation reserve			
Excess of assets over liabilities	R0700	80,333	
Own shares (held directly and indirectly)	R0710	0	
Foreseeable dividends, distributions and charges	R0720	0	
Other basic own fund items	R0730	5,122	
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	0	
Reconciliation reserve	R0760	75,210	
Expected profits			
Expected profits included in future premiums (EPIFP) - Life business	R0770	2,148	
Expected profits included in future premiums (EPIFP) - Non- life business	R0780	0	
Total Expected profits included in future premiums (EPIFP)	R0790	2,148	

S.25.01.21

Solvency Capital Requirement - for undertakings on Standard Formula

		Gross solvency capital requirement	USP	Simplifications
		C0110	**C0090**	**C0100**
Market risk	**R0010**	29,539		
Counterparty default risk	**R0020**	2,131		
Life underwriting risk	**R0030**	36,694		
Health underwriting risk	**R0040**	0		
Non-life underwriting risk	**R0050**	0		
Diversification	**R0060**	-15,109		
Intangible asset risk	**R0070**	0		
Basic Solvency Capital Requirement	**R0100**	53,254		

Calculation of Solvency Capital Requirement		**C0100**
Operational risk	**R0130**	1,485
Loss-absorbing capacity of technical provisions	**R0140**	0
Loss-absorbing capacity of deferred taxes	**R0150**	-5,313
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**	49,426
Capital add-on already set	**R0210**	0
Solvency capital requirement	**R0220**	49,426
Other information on SCR		
Capital requirement for duration-based equity risk sub-module	**R0400**	0
Total amount of Notional Solvency Capital Requirement for remaining part	**R0410**	49,426
Total amount of Notional Solvency Capital Requirements for ring fenced funds	**R0420**	0
Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios	**R0430**	0
Diversification effects due to RFF nSCR aggregation for article 304	**R0440**	0

S.28.01.01

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

Linear formula component for life insurance and reinsurance obligations

		C0040
MCR_L Result	**R0200**	10,252

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
		C0050	**C0060**
Obligations with profit participation - guaranteed benefits	**R0210**	0	
Obligations with profit participation - future discretionary benefits	**R0220**	0	
Index-linked and unit-linked insurance obligations	**R0230**	1,192,498	
Other life (re)insurance and health (re)insurance obligations	**R0240**	0	
Total capital at risk for all life (re)insurance obligations	**R0250**		2,656,044

Overall MCR calculation

		C0070
Linear MCR	**R0300**	10,252
SCR	**R0310**	49,426
MCR cap	**R0320**	22,242
MCR floor	**R0330**	12,357
Combined MCR	**R0340**	10,252
Absolute floor of the MCR	**R0350**	4,000
		C0070
Minimum Capital Requirement	**R0400**	12,357