

Solvency and Financial Condition Report (“SFCR”)

EMANI continues to believe that an efficient Corporate Governance is extremely useful and effective in stimulating the use of best governance practices as recorded in the Solvency and Financial Condition Report (“SFCR”). Yearly, The Executive Committee and the Board of Directors are issuing a statement that the Mutual has complied with, and will continue to comply with, Corporate Governance Code that contains both nationally and internationally recognised standards of good and responsible enterprise management.

The SFCR covers the Business and Performance of EMANI and the Swiss Branch, its system of Governance, Risk Profile, Valuation for Solvency Purposes and Capital Management. EMANI is always required to hold sufficient assets to match its liabilities while at the same time be committed to high governance standards. A primary responsibility of the Board is to ensure that eligible capital is adequate to cover the required solvency for the nature and scale of the business.

31/03/2022

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1. Business and performance

This Association has legal personality by virtue of Article 146 of the Belgian Act of June 25th 1992 on terrestrial insurance contracts. (Moniteur Belge, 20th August 1992).

The Association is incorporated under the name “EUROPEAN MUTUAL ASSOCIATION FOR NUCLEAR INSURANCE”. It may also use the shortened name “EMANI”. The registered office is in 1140 Brussels, Avenue Jules Bordet, 166 b 4.

In 2013, EMANI opened a Swiss branch as required by the Swiss Regulator FINMA. EMANI’s activities in Switzerland are allowed via the EMANI Swiss Branch which was registered in the Commercial Register of the Canton Zug in 07/06/2013 under the number CH 170.9.001.579-1 and received its license from the Swiss regulator FINMA on 30/09/2014. The Swiss branch is not a separate legal company from its parent and therefore EMANI carries full liability for the branches operations.

The object of the Association is to indemnify its Insured Members against material damages and business interruption due to fire, nuclear risks and natural forces (insurance class 8) and other damage to property (insurance class 9) to their nuclear installations and associated real-estate and movables adjacent to these installations. EMANI still has a license to insure third-party liability (insurance class 13) but it’s dormant.

To this end the Association may participate in promoting and carrying out any study or activity directly related to the objects mentioned above. The activities of the Association cover Belgium as well as any other country in which the Association has Members and/or where these Members have their activities. The Association may engage in insurance, in co-insurance and reinsurance within the scope of its objects as established by the Articles of Association. The Association shall not have a profit motive and shall not be allowed to make a profit.

Role of EMANI

- ✓ help Members to get the insurance cover they need for their nuclear operations.
- ✓ offer alternative capacity on mutual basis outside the pooling system.
- ✓ reduce cost of insurance of Members
- ✓ provide supplementary insurance capacity based on its own funds and reinsurance.

The objectives of EMANI are the followings:

- ✓ retain surpluses in the mutual in order to strengthen the mutual’s funds.
- ✓ allocate the capacity to the EMANI programs.
- ✓ participate in underwriting of insurance and reinsurance of EMANI members.
- ✓ prudent investment policy in order to maintain the mutual’s funds.

a) Underwriting & business performance

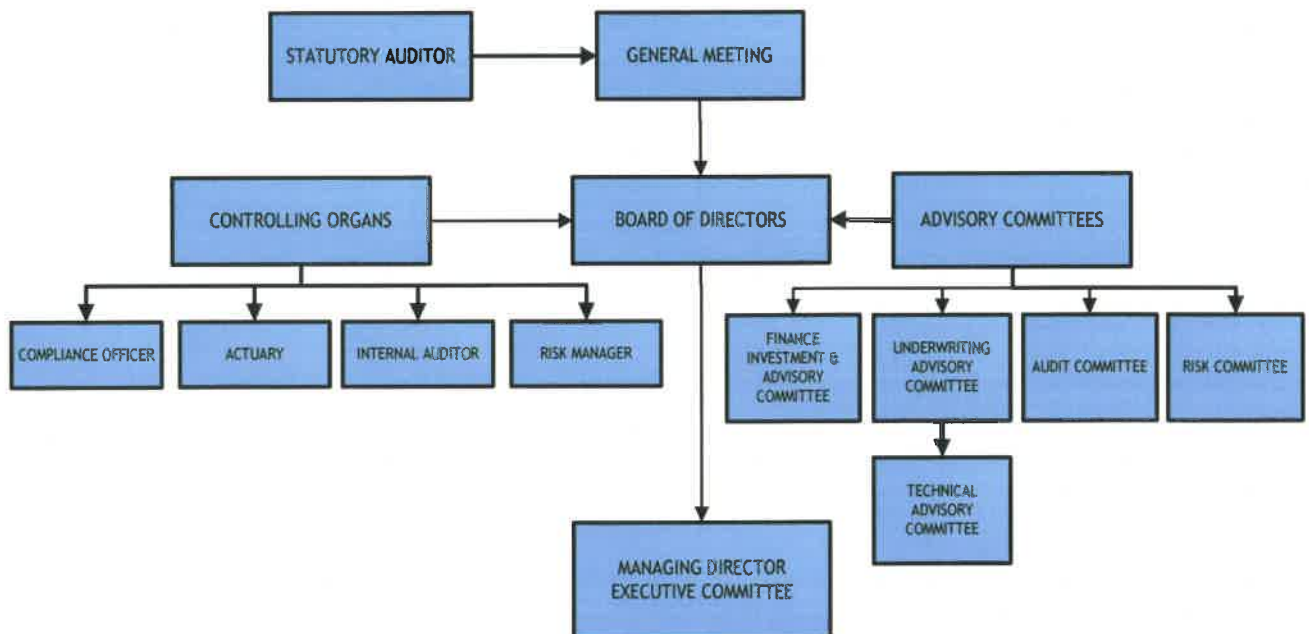
The table below shows an overview of the performance at 31 December 2021.

INCOME STATEMENT AS OF 31 DECEMBER 2021
(Currency - Euro)

		31/12/2021
1. Earned premiums net of reinsurance		
a) Gross premiums		46.428.983,81
•	Premiums written	47.961.717,70
•	Rebates to members	-1.532.733,89
b) Reinsurance premiums		-21.054.667,57
c) Variation of the reserve for unearned premiums and unexpired risks. gross of reinsurance (increase - decrease +)		-2.087.156,76
d) Variation of the reserve for unearned premiums and unexpired risks. reinsurers part (increase + decrease -)		834.455,00
		24.121.614,48
2bis. Investment income		
b) Income from other investments		12.764,21
c) Write-back of adjustments on investments		1.163.649,97
d) Realized capital gains		6.431.904,88
		7.608.319,06
3. Other technical income net of reinsurance		64.472,32
		64.472,32
4. Costs of claims. net of reinsurance (-)		
a) Net amount paid		-4.276.378,47
aa)	gross amount	-5.967.952,72
bb)	part of reinsurers	1.691.574,25
b) Variation of the claims services reserve net of reinsurance (increase -, decrease +)		4.928.123,25
aa)	variation of the reserve for claims gross of reinsurance (incr. -. decr. +)	6.757.306,33
bb)	variation of the reserve for claims part of reinsurance (incr. +. decr. -)	-1.829.183,08
		651.744,78
6. Cost of refund of contribution. net of reinsurance (-)		
a) Net amount paid		0,00
b) Variation of the refunds reserve. net of reinsurance (incr - decr +)		0,00
		0,00
7. Net operating expenses (-)		
a) Acquisition expenses		-210.233,45
b) Administrative expenses		-4.039.936,09
		-4.250.169,54
7bis. Expenses relating to investments (-)		
a) Expenses for managing investments		-578.903,67
b) Adjustments to investment values		0,00
c) Realized less values		-101.499,41
		-680.403,08
8. Other re-insurance charges		0,00
SURPLUS / (DEFICIT) OF THE PERIOD BEFORE VARIATION RESERVE FOR EGALISATION AND CATASTROPHIES		27.515.578,02
9. Variation in the reserve for equalisation and catastrophies. net of reinsurance (increase -decrease +)		-20.422.497,72
Surplus / (Deficit)		7.093.080,30
15. Impots		-29.695,29
Surplus / (deficit) of the period available for distribution		7.063.385,01

2. Management structure, remuneration and Membership

2.1 Management structure



a) Board of Directors (composition, duties)

The General Meeting nominates the Board of Directors for a three-year period but can dismiss them at any given time. On completion of their three years period of office, Directors shall be eligible for re-appointment.

EMANI is responsible to select and maintain competent and professional reliable persons for the functions within the Board. The (re)nomination of members of the Board of Directors is therefore subject to prior written approval by the Belgian supervisor who assesses the candidates in accordance with the principles included in the circular on Fit & Proper requirements. The Board is responsible to install an appropriate recruitment-, evaluation- and education policy and will therefore perform an assessment of the candidate on fit- and properness at the moment of selection. The NBB will receive a copy of the fit and proper assessment.

The composition of the Board will be balanced considering the respective skills, experience and background of each of the Board members. Board members undertake that they have sufficient time to exercise their duties, taking into consideration the number and importance of their other commitments.

The Board of Directors is a management body who jointly oversees the activities of the Association and decides on the Risk Appetite of EMANI. The Board of Directors has following main tasks in accordance with article 44 and 77 of the Solvency Law:

a) Determining the general company strategy, risk policy and integrity policy in accordance with Article 44 of the Solvency II Law.

As regards the company's strategy and objectives, the Board of Directors determine and validate:

- ✓ EMANI objectives;
- ✓ the organisational structure and internal control structure;
- ✓ the governance system supported by the Fit & Proper policy, the remuneration principles, the outsourcing policy, the IT security and continuity plan as well as the policies of the independent control functions;
- ✓ reporting intended for the public particularly the Solvency and Financial Condition Report.

As regards the risk policy, the Board of Directors specifically:

- ✓ determine the risk appetite and general risk tolerance limits;
- ✓ approve the general risk management policy such as the policy relating to the management of underwriting and reserve risk, capital management policy, the investment policy, the liquidity policy, the operational risk policy, the ORSA policy;
- ✓ be the first line as regards risk-based strategic decisions and be closely involved in the ongoing supervision of the development of the risk profile;
- ✓ approve the Regular Supervisory Report (RSR) and the Own Risk and Solvency Assessment (ORSA).

Finally, the Board of Directors also approve the integrity policy, which establishes the company's fundamental ethical principles and includes at least the following: rules on conflicts of interest, rules on whistleblowing, codes of conduct, etc. The integrity policy is an integral part of the memorandum corporate governance.

b) Supervision of activities and regularly assessing the effectiveness of the governance system. This supervision is exercised through reporting by the independent control functions, effective use of the investigative powers of the Board of Directors and reporting by the Executive Committee as well as Advisory Committees.

In line with Article 77 of the Solvency Law, the Board of directors:

- ✓ assess the effectiveness of the company's governance system at least once a year and ensure that the management committee take the necessary measures to tackle any non-conformity;
- ✓ at least once a year assess the proper functioning of the four independent control functions. Apart from the assessments, it submits in particular for compliance annually a report on the assessment of the proper functioning of the compliance function to the Supervisor;
- ✓ determine which measures must be taken as a result of the findings and recommendations in the internal audit;

- ✓ at least once a year assess the general principles of the remuneration is responsible for the supervision of the implementation thereof. This is performed in particular by the Chairman of the Board;
- ✓ bears the responsibility for the integrity of the accounting and financial reporting systems, including the rules for operational and financial control, and ensure that these systems offer a reasonable degree of certainty as to the reliability of the financial reporting process.

The Board of Directors appoints among its members a Chairman and two Vice-Chairmen with the criteria that they can't be member of the Executive Committee. Their mandate stands for a period of three years but is re-eligible. The Chairman of the Board of Directors supervises the division of the powers and diligences between the Board of Directors and the Executive Committee. The NBB shall be consulted before appointing or dismissing a Board member. The Board of Directors meets as frequently as the interests of the Mutual requires but at least four times a year and whenever five or more Directors make a written request.

The non-executive and the external Directors and the Executive Directors may be remunerated for their mandate. Their remuneration is fixed by the General Assembly of the Association. The position of member of the Board cannot however be exercised under an employment contract. Board members, travelling on EMANI business will be reimbursed for travel expenses according to the Board expense policy.

In line with the fit and proper requirements applicable the fit and proper policy, the Board of Directors performs annually a self-assessment.

Board members

- | | |
|---------------------|---|
| • A. Russell | Chairman |
| • C-D. Bölle | Vice-Chairman |
| • B-P. Jobse | Vice-Chairman |
| • P. Vandekerckhove | Executive Director & Managing Director |
| • M. Vercammen | Executive Director & Finance Manager |
| • T. Houben | Executive Director & Chief Risk Officer |
| • C. White | Independent Director |
| • M. Blair | Independent Director |
| • E. Laugier | |
| • P. Sätmark | |
| • R. Scholl | |
| • K. Kelly | |

b) Executive Committee (composition, functions)

To the Executive Committee are delegated all the management powers of the legal administrative body, excluded the determination of the general policy, acts reserved for the legal administrative body by the Companies Code or by the law of 13 March 2016 on the legal status and supervision of insurance or reinsurance companies. The management of the Association is delegated to the Executive Committee within the framework of the general policy of the Association and in accordance with the laws and regulations in force. They are responsible for the execution and management of the outcome of all Board decisions.

The Board of Directors appoints from among its members the members of the Executive Committee. All members of the Executive Committee are member of the Board of Directors. The aim is to ensure that the effective management takes part in the general policy and decision-making processes. The members of the Executive Committee cannot become the majority in the Board of Directors.

Special powers can be determined and granted by the Board of Directors to the members of the Executive Committee or to certain members of personnel. These powers relate to financial and administrative matters and are published in the annexes of the 'Moniteur Belge'.

The Board of Directors and Executive Committee shall cooperate appropriately, both with each other and with all Committees set up by them, as well as with those responsible for the independent control functions of EMANI.

Members of the Executive Committee receive no additional compensation for their engagement and are just for their operational tasks. The position of member of the Executive Committee cannot be exercised under an employment contract.

Following tasks come under the responsibility of the Executive Committee:

- ✓ Implementing the strategy developed and approved by the Board of Directors and Members;
- ✓ undertaking the management of EMANI in accordance with the strategic goals established and with due regard to the risk tolerance limits laid down by the Board of Directors;
- ✓ supervising line management and compliance with responsibilities and regulatory processes;
- ✓ making proposals and giving advice to the Board of Directors for determining the general policy and strategy;
- ✓ Implementing the risk management system;
- ✓ translating the risk appetite framework and its governance policies into procedures and processes;
- ✓ supervising the development of the risk profile and overseeing the risk management system;
- ✓ implementing the necessary measures to control risks;
- ✓ making sure, based on the reports of the independent control functions, that all relevant risks to which EMANI is exposed (financial risks, insurance risks, operational and other risks) are appropriately identified, measured, management, controlled and reported;
- ✓ Introducing, monitoring and assessing the organisational and operational structure;
- ✓ setting up an organisational and operational structure to support the strategic goals by determining the powers and responsibilities of each department and specifying the reporting and procedures;
- ✓ setting up appropriate internal control mechanisms at every level of the company and assessing the appropriateness of those mechanisms,
- ✓ implementing the necessary framework for the organisation and the proper functioning of the independent control functions, assessing the effectiveness and efficiency of the policies on risk management, internal control and governance established;
- ✓ supervising the correct implementation of the remuneration principles;

- ✓ setting up an internal reporting system that gives a reasonable degree of certainty as to the integrity of the financial information and prudential reporting;
- ✓ Implementing the integrity policy and memorandum corporate governance by translating them into concrete procedures and processes;
- ✓ supervise reporting to the Board of Directors, Supervisor and other stakeholders;
- ✓ communicating the relevant information and data to the Board of Directors and/or where applicable to one of its sub-committees, to allow them to monitor the company's activity;
- ✓ implementing the policy established by the Board of Directors for reporting (Article 77, § 7 of the Solvency II Law) and, in this context, submitting the expected prudential information to the Supervisor. The Executive Committee will therefore approve the reporting on the annual and quarterly Quantitative Reporting Templates (QRTs) in accordance with Articles 80, § 5, and 202 of the Solvency II Law. Moreover, the Executive Committee shall formally declare annually and half-yearly that the information provided to it in accordance with Articles 312 to 316 of the Solvency II Law (i) is complete, (ii) accurately reflects the situation of the company, taking into account its risk profile, and (iii) is established in accordance with the legal rules and the instructions of the Bank;
- ✓ providing a report at least once a year to the Board of Directors, the accredited statutory auditor and the Supervisor on the effectiveness of the internal control system.

Members of the Executive Committee

- P. Vandekerckhove (Managing Director)
- M. Vercammen (Finance Manager)
- T. Houben (Chief Risk Officer)

c) Advisory Committees of the Board of Directors (composition, functions)

The Board appoints and dismisses the delegated members of the specialized Board Committees in charge of advising the Board: the Finance Committee (FC), the Audit Committee (AC), the Underwriting Advisory Committee (UAC) and the Risk Committee (RC). The existence of the Committees doesn't decline the overall responsibility of the Board. Board Committees provide advice and support in their field of expertise by making recommendations towards the Board of Directors.

EMANI is not obliged to set up an Audit Committee because it only meets one of the three criteria imposed by article 52, § 1 of the Insurance Supervision Act of 13 December 2016. However, for good governance purposes EMANI has put in place an Audit Committee but the composition of the Committee on the principle of independent is not as defined as in article 48 of the Insurance Supervision Act.

The Audit Committee reports to and assists the Board in fulfilling its oversight responsibilities in the areas of corporate finance, risk management, corporate controls, financial communication and all other related areas as deemed appropriate. It is also authorized to obtain independent advice, including legal advice, if this is necessary for an inquiry into any matter under its responsibility. It is entitled to call on the resources that will be needed for this task. It is entitled to receive reports directly from the Statutory Auditor, including reports with recommendations on how to improve the Mutual's control processes.

The Finance Committee makes recommendations for approval by the Board to review strategies, plans, policies and actions related to the financing of its assets and liabilities. In particular, the Finance Committee proposes, monitors and recommends changes to/of:

- Investment policy
- Investment guidelines
- Investment manager
- Accounts, annual financial accounts

The purposes of the Underwriting Advisory Committee are to review and evaluate EMANI's policies, guidelines, performance, processes and procedures relating to the underwriting of risks undertaken by the Mutual as well as to discuss, monitor and oversee the guidelines and policies that govern the process. The Underwriting Advisory Committee is assisted by the Technical Advisory Committee for any technical questions.

The Risk Committee is comprised of the members of the Board and as secretary the risk management function. The Risk Committee will assist the Board of Directors in fulfilling its oversight responsibilities with regard to the risk appetite, risk management and compliance framework, and the governance structure that supports it.

All Advisory Board Committees have charters that explain their purpose and their role including the responsibilities of the Committee towards the Board of Directors as advisory body.

Committee members are nominated by the Board of Directors for their experience in the specific areas of the Committee they take part in. Every Committee consists of a mix of Board members, other members and even staff to ensure execution and communication on every level of the Association. Every Committee has a personalised charter explaining its rights and duties.

Committee members are nominated by the Board of Directors to the term of the Board of Directors being 3 years. Each member of the Committee must at least participate in person or by conference call in $\frac{3}{4}$ of the meetings over the period of 3 years. Non-compliance will lead to not being eligible for the next 3 years period.

In line with the fit and proper requirements, every Committee performs annually a self-assessment.

Each of the members of Committees must sign a confidentially agreement.

Members of an Advisory Committee receive no additional compensation for their engagement.

2.2. Remuneration

EMANI's overall remuneration system has been designed to deliver compensation, driven by both Mutual and individual performance, and according to its Members' interests. The focus will be on and long-term performance and will be aligned to market levels. Our principles are inspired by the Financial Stability Board principles for sound compensation practices.

Board Members representing a Member as well as Executive Directors receive currently no remuneration. Only Independent Directors receive a fixed and modest cash amount per year which is approved by the General Meeting for the current financial year. No variable nor incentive programs are included for any Board Member.

Individual board members may take on specific ad hoc tasks outside their normal duties assigned by the Board of Directors such as controller of a key functions or critical functions but shall not receive a remuneration

Members of Advisory Committees receive no additional compensation, fixed or variable, for their contribution to the Mutual. Only one exception is made for the chairperson of the Underwriting Committee, who is an independent consultant. In each such case, the Board of Directors shall determine a fixed remuneration for the work carried out in relation to those tasks. The fixed remuneration will be presented for approval at the General Meeting. A fee of 900 euro per meeting is foreseen for this chairperson of the Underwriting Committee.

Members of the Executive Committee receive no additional compensation, fixed or variable, for their contribution to the Mutual. Members of the Executive Committee are self-employed in line with Companies Code, and the Board of Directors sets the terms within the frames of the contracts.

Actual expenses related to Board and Committee meetings are reimbursed.

The remuneration of all employees comprises a combination of basic salary, appropriate benefits and a variable remuneration. The remuneration policy is designed so as not to encourage unauthorised or unwanted risk-taking that exceeds the level of tolerated risk of the undertaking. Remuneration is structured and managed fair and competitive respecting appropriate proportions.

The Chairman of the Board and the two vice-chairmen of the Board set out the annual objectives and subsequent evaluation of the performance of the Managing Director. The Chairman of the Board and the two vice-chairmen of the Board, and the Managing Director, set out the annual objectives and subsequent evaluation of the performance of the Executive managers. The Managing Director sets out the annual objectives and subsequent evaluation of the performance of the other staff. The evaluations are monitored by the Chairman of the Board.

2.3. Membership

a) Process for monitoring the changes in the Membership structure

Each of our Members is an important player on the international energy market and is therefore submitted to intensive surveillance by national and international authorities. Due to their size and (self)-control, EMANI considers its Members as being reliable and financially sound. Still a financial assessment is performed on a candidate Member on the one hand and a yearly financial review for existing Members on the other hand.

Membership is submitted to the Board of Directors and becomes effective after approval by General Meeting. New Members have to contribute to a sound and prudent management in EMANI as well as to the stability of the financial institution and its development on a going concern basis. The fee to enter as a Member is set at 10.000 €.

Every Member represents one vote in the Mutual except for the non-insured Members who have no voting rights. Because every insured Member is treated equally, there are no controlling Members.

EMANI encourages its Members to participate at the Members Meetings. The General Meeting acts by simple majority of votes if quorum is reached unless for those cases stated in the Articles of Association where the approval is needed of three-quarters of the Members.

Yearly there can be two Members Meetings, one before the 30th June and another in the second half of the year. As the Annual General Meeting according to Article 10 of the Articles of Association must meet before the 30th June, the AGM and Members Meeting are organized on the same day. Minutes of the AGM are drafted and adopted during the meeting itself.

The current Members can be consulted on the website of EMANI.

3. Fit & Proper, external functions and transactions with Governing Bodies

3.1. Fit & Proper

a) Policy

Annually, EMANI updates and discloses a fit & proper policy to the NBB. Two standards of evaluation are at the center of the fit and proper policy:

1) Expertise (« fitness »):

A person is considered as being expert ("fit") for a specific function when he / she combines knowledge and experience, skills and the professional behavior required for the function in question.

2) Professional worthiness (« properness »):

The professional worthiness concerns the honesty and the integrity of a person. A person is considered as professionally honorable ("proper") in the absence of indicating elements the opposite and when there is either no reason for questioning reasonably the good reputation of the person involved. In other words, we can leave the principle that the person will execute in an honest, ethical and integrate way the task which is confided to him (her).

All people occupying critical functions in EMANI are aimed by this policy. By critical function we understand:

- The members of the Board;
- The members of the Executive Committee;
- Four key functions defined in the Directive Solvency II: Actuarial, Compliance, Risk Management and Internal Audit Function.
- Any other function which EMANI would estimate as critical for the smooth running of the company either internal or external.

Critical functions have to have the necessary professional expertise, the skills and the worthiness to be able to perform their functions. The same requirements apply to the holders of any critical outsourced function.

In order to remain fit & proper, EMANI at least yearly evaluates the critical functions. The Board and Executive Committee therefore performs an annual self-assessment. The key functions are assessed yearly by the responsible person.

b) Implementation Process

"Fit and proper" implies a thorough process of evaluation which allows to obtain, by means of various relevant elements, the most complete possible image of the capacity of a person for a determined function. The evaluations concerning, on one hand, the expertise and, on the other hand, the professional worthiness of a person, are complementary.

The available information which can support a "fit and proper" file is always used and balanced according to their relevance and to their importance compared with the responsibilities. Several weighting factors allow not granting the same importance for all the elements of the case. EMANI takes into account following weighting factors:

- ✓ The gravity of the information in the light of the objectives of the prudential control
- ✓ The seniority of the information
- ✓ The attitude and/or the motivation of the concerned person with regard to the information
- ✓ The combination of available information

A global overview of histories and available information allows to obtain a less static and precise image of the functioning of the person. The combination of the information gives an idea of the way of functioning and/or the carelessness of a person and can lead to the conclusion that the interested is not considered (any more) as being capable or has to improve its expertise on a very precise point.

The evaluation of capacity takes place as in principle before the entry in a function or during a change of function. Management assists the candidate by transferring relevant documents.

3.2. Loans, credits or guarantees and insurance contracts for Governing Bodies and Members

There are currently no loans, credits or guarantees and insurance contracts granted to Members of the Board of Directors or Executive Committee.

No loans/credits are granted to shareholders, related institutions and related persons in the event of transactions of more than of EUR 100,000.

4. Risk Management System, ORSA process and risk management function

4.1. Risk Management System

a) Framework for risk appetite and tolerance limits

The appetite for risk represents the underlying foundation of any effective Risk Management System. Understanding risk appetite helps Boards and managements to make better strategic and tactical decisions. It enhances understanding of Board and stakeholder expectations and enables risk-reward decision-making. It reduces the likelihood of unpleasant surprises.

The ability to take on risks is determined by more than just a capacity to absorb losses. The ability to manage risks based on skill sets and experience, systems, controls and infrastructure is also crucial. Understanding risk appetite helps in the efficient allocation of risk management resources across a risk portfolio, and may enable the pursuit of business opportunities that, without an understanding of the appetite, would otherwise be rejected.

The Risk Appetite Framework (RAF) is defined as being the overall approach, including policies, processes, controls, and systems, through which risk appetite is established, communicated, and monitored. It includes a risk appetite statement, risk limits, and an outline of the roles and responsibilities of those overseeing the implementation and monitoring of the RAF.

The RAF has been developed to articulate the level of risk that the Board is willing to accept in order to achieve the overall strategic objective.

The RAF contains the following characteristics:

- ✓ Identification of the key areas used to measure the success in achieving its overall objectives. These have been determined as available capacity, underwriting results, solvency, liquidity and reputation. These are referred to as “Dimensions” in this report;
- ✓ Quantification of the risk appetite attributed to each of the areas above, where quantifiable;
- ✓ Risk Profile (Risk Log): all of the risk faced by EMANI are identified, shortly described and categorized both for the head office and for the Swiss Branch;
- ✓ Integration and control of the risk appetite through the Association;
- ✓ Dashboard for monitoring.

We define the risk appetite as being the nature and quantity of risks that EMANI is ready to accept or to tolerate in the pursuit of its strategic objectives, taking into account the expectations of the stakeholders.

The risk tolerance defines the maximum amount of risk (bearing activities) needed to achieve all the organisational strategic objectives while simultaneously remaining compliant with the stakeholder’s expectations.

The risk target is the optimal risk level to achieve the strategic objectives with respect of the tolerance limits.

b) General risk management policy

EMANI assumes risk to generate an adequate return on capital. The success of its business model therefore depends materially on its ability to manage risk. EMANI considers the implementation of a suitable and effective Risk Management system as a strategic imperative not only to meet increasingly changing regulatory requirements but also to gain a competitive edge by improving its understanding of its own risks and overall solvency needs.

As an integral part of EMANI's business cycle, the Board shall approve the Risk Strategy and issue a Statement of Risk Appetite. "Risk" is defined as the degree of uncertainty with respect to achieving planned goals and targets and equally encompasses the probability of loss or gain. The Risk Strategy, including the Statement of Risk Appetite shall be clearly reflected in the agreed business targets, financial budgets, underwriting guidelines, and operational plans.

The Board delegates to the Executive Committee the responsibility of implementing adequate risk management processes and policies to ensure risk management is correctly embedded within all operations and in all departments. The Board and Executive Committee are assisted in this task by the CRO and Risk Committee.

A Risk Management Policy documents EMANI's internal Risk Management guidelines that staff members are required to observe when exercising their day-to-day responsibilities. The purpose of the Risk Management Policy is to establish a Risk Management framework that enables EMANI to achieve an accurate and timely understanding of (1) the nature, materiality and sensitivity of the risks to which it is exposed, (2) its ability to mitigate and manage them, and (3) to deal with them should they fall outside the stated Risk Appetite and agreed risk tolerances and limits. EMANI's Board owns the Risk Management Policy. As such, the Board is responsible for the approval of any periodic changes and revisions introduced to this document.

EMANI's Risk Management Policy, its Risk Management System and ORSA are to be reviewed by the Board at least annually. The review will be based on input provided by the CRO and Senior Management. More regular reviews may be undertaken when required or when there is a material change in the business or risk profile of EMANI or where a risk issue which raises doubts about the effectiveness of the Risk Management System has been identified.

4.2. ORSA process

a) ORSA policy

The ORSA process seeks to draw together considerations of risk, capital and returns within the context of the overall business strategy, both in the present and forward looking, providing a holistic view of the capital, risk and return over the forecast period.

The process is iterative, as outlined below:



The ORSA process is used to:

- ✓ Ensure there is sufficient capital available to meet the current business requirements (Solvency II compliance);
- ✓ Determine the supplementary capital required to meet the growth and diversification plans and other strategic decisions;
- ✓ Ensure that any risks that exceed the risk appetite are identified, assessed and if required the remedial action plan in place;
- ✓ Provide assurance to the Board, financial regulators and other stake holders that risk management and capital planning processes are embedded within the business.

The adjustments are the result of exchanges between management and the Board, while operational limits are developed jointly by the risk taker and risk management function.

We must therefore expand and review a large number of future scenarios (defined in terms of the most significant risks), to change the risk parameters and compare the different risk margins and the respective capital requirements and then take recapitalization measures or risk mitigation if necessary. We are then able to conclude whether the tolerance limits are exceeded and whether measures should be taken.

It is important that the ORSA process is a continuous reiterative process which is embedded within the business decision making and strategy setting process.

EMANI performs an ORSA at least annually or when the risk and solvency profile change significantly. The risk profile is continuously monitored against the risk appetite and periodically reported by CRO.

b) Implementation process

The overall purpose for the ORSA assessment is to ensure that we can continuously meet our current and planned future regulatory targets and internally set capital target, in the face of planned changes to the risk profile and business plans, and expected development in the external environment.

As a management tool, it is designed to embed risk awareness within the business culture and decision making. It is an integral to the successful delivery of the overall strategic plan as it provides the management with a good understanding of the risk it is assuming and the capital required to cover those risks. It must be treated as a management process rather than a compliance exercise.

TIME HORIZON

The time horizon of the ORSA is fixed to 5 years, same horizon as used in the strategic business plan. The strategic business plan is the Base scenario of the forecasted P&L and Balance Sheet. For the solvency projections in ORSA use will be made of best estimates, market value balance sheet and SCR from Pillar I calculations as starting point.

SCENARIO - STRESS TESTS

The Strategic Business Plan (SBP) figures will be used for projection of the technical provisions and cash flows in and out. The calculation of the projected SCR can then be done. The final result is the “Base Case” and gives the expected capital needs/surpluses.

Besides the base scenario, we analyse also the effects of adverse developments on its solvency position. This is done with the help of scenario analysis and stress testing: we define scenario analysis as assessing the impact of a combination of factors. Stress testing is an extreme scenario that crosses the boundaries of the SCR-MCR. By applying scenarios, we want to:

- Address the main risk factors we may be exposed to;
- Address specific vulnerabilities (regional, sectorial characteristics, specific products or business, ...);
- Test the strategic Business Plan and its alternatives;
- Contain a narrative scenario which includes various trigger events;

A range of scenarios are considered encompassing different events and degrees of severity:

- normal business scenarios
- more pessimistic scenarios
- narrative scenarios
- reverse scenarios

Concerning stress testing, we have our own guidance:

- We regularly review the stress testing program and assesses its effectiveness;
- The stress testing program is used as a risk management tool supporting business decisions and actions;
- We perform sensitivity analysis for specific risks, if necessary;
- Reverse stress testing, of issues that threaten the viability of the company, are also analysed.

USE OF THE ORSA RESULTS

A part of the ORSA is the determination of the capital needed to manage the business. The results of ORSA are used for:

- Yearly evaluation of the risk appetite framework in relation to the capital position and the strategy;
- Start the strategic business plan with the most recent capital assessment;
- Monitoring capital position from regulatory, rating agencies and internal angle;
- The assessment of the target and realized solvency ratios;
- An analysis of the evolution of the capital position and the forecast of eventual funding requirements on the horizon period.

MANAGEMENT ACTIONS

We use also the results of the ORSA to take management actions:

- Accept the risks.
- Mitigate the risks.
- Transfer the risks.
- Terminate the risk generating activity.

FREQUENCY OF THE ORSA AND TRIGGERS

We perform an ORSA at least annually and an update when the risk and solvency profile change significantly. The risk profile is continuously monitored against the risk appetite and periodically reported.

The first step in the ORSA is to determine if the information used in the last ORSA is still up to date:

- Any material changes in the business strategy?
- Any changes in the risk appetite?
- Has the risk profile changed?
- Analyse the capital position and the quality of capital (classification in tiers);
- Analyse the appropriateness of the model (standard model) for representing the risk profile.

Examples of trigger for updating the ORSA:

- An acquisition that significantly changes risk profile.
- A significant change in the financial markets that has a big impact on the value of the asset portfolio.
- A significant change in regulation.

The decision of performing an update of the ORSA is taken by the Executive Committee.

REPORTING

An annual ORSA Report will be produced by the Risk Management Function. This report will be discussed at different levels:

- First level: the resulting ORSA report will be discussed and approved by the Executive Committee.
- Second level: the resulting ORSA report will be discussed and recommended by the Risk Committee.

- Third level: finally, the report will be discussed and the sign off will be given by the Board of Directors.
- Recommendations from Executive Committee, Risk Committee and Board of Directors can be included as action plan.

QUALITY REVIEW

The quality review is conducted by the Executive Committee and acknowledged by the Board of Directors.. The quality review will treat at least the following aspects:

- The ORSA policy;
- The ORSA process;
- The methods used;
- The outcome of the ORSA and the follow-up of management actions.

The following criteria will be judged to assess the quality:

- Training and experience of staff involved;
- The cooperation between key functions: actuary, risk management, compliance;
- The involvement of management.

4.3. Risk Management Function

The Risk Management Function, is responsible to maintain an enterprise-wide aggregated view on EMANI's risk profile and operate its Risk Management System, monitors and reports to the Risk committee on actual risk exposures in comparison to Risk Appetite, Risk Tolerance and solvency requirements as set by the Board. The Risk Management function is executed by the CRO and member of the Board and Executive Committee.

The Risk Management Function, objectively and free from the influence of other parties, is responsible for:

- ✓ implementing appropriate methodologies and procedures to assess EMANI's risks and solvency position ensuring their assessment is consistent with prevailing professional standards and regulatory requirements.
- ✓ implementing appropriate methodologies and procedures for risk assessment including Risk Policy and Risk Strategy.
- ✓ Reporting details of material risk exposures and advising the Board, Executive Committee and senior management with regard to risk management matters including the Risk Appetite, risk tolerances and risk limits.
- ✓ Monitoring risk aggregations (and diversifications) across lines of business, geographies, risk types and categories, etc.

The Risk Management function works closely with the other control functions including the internal auditor to make sure that the full scope of control is covered but not twice.

5. Organizational structure, internal control, compliance function, integrity and IT infrastructure

5.1. internal Control System

Identification and assessment of the risks

The permanent control system has to lean on an analysis and a measure of the risks, regularly updated, by every person in charge of business units (which are risk owners).

Every stakeholder within EMANI has an internal control responsibility. The Board of Directors is responsible for promoting a high level of integrity and for establishing a culture within the Association that emphasizes and demonstrates to all levels of personnel the importance of internal control. Management is responsible for the implementation of the internal control principles. It is therefore essential that everyone included all personnel, understand the importance of internal control and engage actively in the process according to their responsibilities and specific duties.

In establishing and maintaining an effective system of internal control, EMANI assesses both the internal and external risks that it faces as well at the level of the Brussels headquarter, as at the level of the branch in Switzerland. Assessment includes the identification and analysis of all significant risks that the mutual is exposed to.

For the identification and description of risks, EMANI has focused on key risks and on management related controls that mitigate those risks. EMANI's key risks definitions are based on existing information such as different control reports and regularly self-assessments. To lead to an efficient identification of those controls, interviews were conducted with every member of the Management.

EMANI additionally estimates the potential loss given default of each risk category in case the risk should occur. In order to quantify each individual risk, EMANI therefore combines two parameters which are the probability of occurrence and the (financial) loss impact. Furthermore, an evaluation is made on the effectiveness of the current controls so that the Association can target threats and plan actions where needed.

Finally, EMANI emphasizes that risk awareness is a priority of every member of staff.

A specific assessment on internal control of the Swiss Branch is disclosed yearly to the local Supervisor.

Policies and procedures

Policies and procedures are instruments of organization and control that contribute to the realization of the fixed objectives. They have to be in adequacy with the various identified, easily accessible risks and be the object of a communication and adequate trainings. They must be updated also regularly. The risk owners are responsible for the maintenance of processes and procedures.

Control processes occur throughout the entire organisation, at all levels and in all functions, since everyone in EMANI bears responsibility in internal control. Focus will be on "at the top" perspectives, but adequate controls must exist and understood in all departments and by all employees with access to control mechanisms. EMANI uses the four eyes principle to protect itself against mistakes and dishonesty in day-to-day management and outgoing payments and communication.

The Executive Committee takes all necessary internal control measures to ensure that all the divisions of the Association have job descriptions with clear responsibilities. The Executive Committee is responsible for implementing the risk management strategy and designing the structure so it is integrated into the organisational structure.

Management is charged with the maintaining of the internal control systems. Every manager establishes in his department policies and procedures in order to secure that the internal control directives are carried out and that there are sufficient tools for monitoring. Those procedures are gathered in a global Internal Procedure Manual. A manager will regularly monitor whether his procedures are working by periodic checks and balances such as testing of the system, supervision of day-to-day operations, auditor reviews, staff meetings etc. This gathering of information helps him in evaluating if procedures are sufficient and understood by all applicable personnel.

Personnel are charged with the inputting and the accuracy of the information and have to handle accordingly. An Internal Procedure Manual should sensitize staff sufficiently to perform a self-assessment and uphold the principles of good practice. Periodic controls by management ensure the efficiency that the procedures are working and important tasks are crosschecked by their manager. All staff must communicate upward problems in operations or non-compliance with the Internal Procedure Manual. For unethical or unlawful behaviour EMANI applies a "Whistle Blowers" procedure.

Control plans

By "control" EMANI understands supplying the assurance of the conformity of the operations and the processes with one or several standards or rules, as well as the good implementation of these procedures. In a more general term, it indicates any measure taken by the management, the internal or external auditors or the other parties to manage the risks and increase the probability that the purposes and the fixed objectives will be reached.

EMANI has formalized and documented the system of control on different levels. A good example is the performance of the self-assessment by the risk owner of the risk log. The risk owner identifies in a personal self-assessment the frequency with which the process is reviewed, verifies that the measurement system is adequate, if corrective actions should be taken, and looks forward to where the risk might be in the year to come.

Reporting and recommendations

The reporting is the responsibility of the Risk management function. Further to a report on a situation of failure or inefficiency or an evolution of the permanent control, various participants can emit a recommendation (the Supervisor, the Statutory Auditor, the Internal Auditor) or introduce an action of correction / prevention. The impulse of actions of correction or prevention and their follow-up are the current responsibilities of the management. The level of formalization in the action plan possibly implemented and its follow-up must be proportioned at the incurred risk, at the difficulty of implementation, at the desire at the risk of the Mutual.

Piloting, action, arbitration

Every person in charge examines regularly the business unit he is responsible for in order to enhance the control system, in particular the procedures, the controls or the monitoring systems of the risks. These decisions also include the organization and the affectation of means in resources (human or computing).

The piloting by the person in charge also has to take into account the contributions of the periodic control and those of the external audit and the Supervisor, of which in particular all the recommendations and the proposals concerning the permanent control system.



5.2. Compliance Function

The Compliance function is in EMANI executed by the Compliance officer. The Compliance officer makes proposals as regards the integrity policy to be followed by the Association and submits them for approval to the Board of Directors. He acts as an adviser to the Executive Committee on the measures to be taken within the context of integrity policy and applicable law, to ensure the development of the entity's integrity code.

The responsibility of the Compliance function is to proactively:

1. identify, assess and monitor the compliance risks faced by EMANI: in particular, the most important mission of the Compliance officer is to master the legislative and statutory environment and to watch his respect by EMANI

2. assist, support and advise management in fulfilling its compliance responsibilities
3. advise any employee with respect to their (personal) compliance obligations thereby helping EMANI to carry on business successfully and in conformity with external and internal standards.

The task of the Compliance officer is not limited to analyzing the situation, identifying a solution and giving advice to management. The Compliance officer must continue to pursue the matter until a satisfactory solution has been fully implemented. If necessary, the actions taken should include escalating the issue to a higher level.

The Compliance function activities includes:

- ✓ Identification and prioritization of potential compliance risks leading to damage to EMANI's reputation, legal or regulatory sanctions, or financial loss to safeguard the Mutual's reputation, the members of its legal organs of administration, the management, the employees, and in particular the rules of integrity and ethics. The function also includes assessing the possible impact of any changes in the legal environment on the operations of the insurance undertaking, and the identification and evaluation of risk of non-compliance;
- ✓ Development and implementation of risk mitigating measures, including clear standards, procedures and guidelines to prevent, mitigate or minimise (important) compliance risks and to detect, report and respond to compliance violations;
- ✓ Risk monitoring;
- ✓ Incidents management: reporting in the ad-hoc tool, initiate and drive appropriate action;
- ✓ Training and education of personnel where needed;
- ✓ Implementation of the Compliance policy and minimum standards;
- ✓ Leading the relationship with the supervisor in compliance related matters.

The compliance officer works in parallel with the internal auditor, CRO and the appointed actuary who communicate him his notices on the contractual, statutory and regulatory measures.

The Compliance function is a key function and must be fit and proper. Therefore, the Compliance function is independent of operational functions within EMANI and has the prerogatives and resources necessary for the proper performance of their duties. The remuneration of the Compliance function is set according to the objectives linked to this function, independent of the performance areas of controlled activities. To avoid potential conflicts of interests will report directly to the Executive Committee and the Board of Directors.

The compliance officer has the widest access right to the information. He benefits from the largest right of initiative.

The compliance officer can rely on a Charter in which is explained the responsibilities and duties of the Compliance function. The Charter is regularly reviewed.

6. Internal Audit Function

Object

The Internal Audit function constitutes a function of independent evaluation within EMANI charged to examine and to estimate the efficiency and the management of its activities. The objectives of the Internal Audit function are to assist the Management of the Association and the Board in the effective fulfillment of their responsibilities by supplying analyses, evaluations, recommendations, advices and information about the examined activities and by promoting an effective control to a reasonable cost.

The Internal Audit function is controlled by the Board and its responsibilities are defined by the Audit Committee of the Board, as being part of the control function.

Professional standards

The staff of the Internal Audit, either the internal staff, or the staff of an outside consultant, will conform to the "Code of ethics" of the Institute of the Internal Audit. The "Standards for the Professional practice of the Internal Audit" and the "Definition of the Responsibilities" will constitute the procedures of functioning of the department.

Furthermore, the Internal Audit will conform to guidelines and to procedures of EMANI as well as to the "Internal Audit charter".

The Internal Audit function is considered to be a key function and has to be fit and proper. Therefore, the Internal Audit function is independent of operational functions within EMANI and has the prerogatives and resources necessary for the proper performance of their duties. The remuneration of the Internal Audit function is set according to the objectives linked to this function, independent of the performance areas of controlled activities.

Powers

Powers are granted to the Internal Audit function to guarantee a total, free and unlimited access to files, to material properties and to staff concerned by any examined function. All the employees are asked to give assistance to the Internal Audit function in the execution of its function. The Internal Audit function will also have a free and unlimited access to the Chairman of the Board and to the Audit Committee. Documents and information given to the Internal Audit function during a periodic examination are treated in the same careful way that by the employees who are normally responsible for it.

Organisation

Within EMANI, the function of Internal Auditor has been outsourced and therefore follows the principles of the outsourcing policy. However, there is sufficient experience within the Board to challenge the findings of the Internal Auditor. The Internal Auditor is nominated by the Board for a period of 3 years. To insure his/her independence, the Internal Auditor reports functionally and administratively to the Finance Manager and to the Audit Committee as

representative of the Board. Periodical monitoring by the management is implemented in order to verify if the Internal Audit and internal control processes are still functioning correctly.

Independence

No element within EMANI can influence the activities of Internal Audit, included the business within the framework of the audit, the procedures, the frequency, the timing or the contents of the reporting to guarantee an independent attitude and free objective reports.

The Internal Auditor will not assume either operational responsibilities or powers in connection with the activities which they examine. Besides, they are not authorised to develop or to promote systems or procedures, to prepare files or to make a commitment in any activity normally subject to an audit.

EMANI enables the person responsible for the Internal Audit to exercise his function in an objective and independent manner and this at every level of the Mutual. Periodical monitoring by the management is implemented in order to verify if the internal audit and internal control is still functioning correctly.

Audit field

The scope of work of the Internal Auditor is to determine whether EMANI's network of risk management, internal control and governance processes, as designed and represented by management, is adequate and sufficient. The responsibilities of the Internal Auditor are further explained in the Internal Audit Charter.

Audit planning

The Internal Auditor starts at the end of year -1 by informing the Audit Committee of the issues and objectives he will focus on for the coming year.

Internal audits take place at the various divisions of the Mutual at regular times but at least twice a year.

Reporting

The audits are executed by an external person who will write down his observations in a report for the Audit Committee. This report, if necessary with comments from the Audit Committee, is finally presented to the Board. Yearly the Executive Committee reports to the Board on Internal Audit. The report is also disclosed to the Supervisor.

In case the internal audit report contains any remark, the management of the audited department will react, in writing, prior to next session of the Internal Auditor. The Internal Auditor will be responsible for the appropriate follow-up of the conclusions and the recommendations inherent to the Audit

7. Actuarial function

In accordance with Article 48 (2) of the Solvency II Framework Directive, the actuarial function is carried out by a person who has knowledge of actuarial and financial mathematics, commensurate with the nature, scale and complexity of the risks inherent in the business and who is able to demonstrate their relevant experience with applicable professional and other standards.

The actuarial function is a key function and must be fit and proper. Therefore, the actuarial function is independent of operational functions within EMANI and has the prerogatives and resources necessary for the proper performance of their duties. The remuneration of the actuarial function is set according to the objectives linked to this function, independent of the performance areas of controlled activities.

Due to the size and the activity (mono-line) of the EMANI, the actuarial function is outsourced and therefore needs to comply with guidelines of the outsourcing policy.

According to article 48 of the Directive Solvency 2, the actuarial function has the following responsibilities:

Coordination of the technical provisions calculation

Control of the methodologies and hypotheses used for the calculation of the Best Estimates

The actuarial function must reveal any incoherence compared with the requirements defined to articles 76 - 85 of the Solvency 2 directive for the calculation of the technical reserves and proposes, if necessary, corrections.

Control and explanation of the evolution of the Best Estimates

According to the article 48 of the Solvency 2 directive, the actuarial function has to explain, between two calculation dates, any importing effects on the technical amount of reserves due to the change of data, methodologies or hypotheses, if these technical reserves are already calculated on basis of the Solvency 2 directive.

Control the data quality

The actuarial function estimates the coherence of the internal and external data used in the calculation of the technical reserves compared with the quality standards of the data defined in the Solvency 2 directive. If necessary, the actuarial function should supply recommendations as for the internal procedures to improve the quality of the data to guarantee that the Mutual is capable of meeting the requirement of the Directive.

Advice on the underwriting and reinsurance policies

The actuarial function has to express her opinion on the Underwriting policy and on the Reinsurance policy of the Mutual. The opinion should contain a link with the technical reserves.

When it expresses an opinion on these policies, it should consider the links between these and the technical reserves Actuarial report

The actuarial function shall analyse the SII calculations, express an opinion and make recommendations to the Board of Directors and Executive Committee. These recommendations will be expressed in a final actuarial report to the attention of the Board of Directors and Executive Committee.

Particular responsibilities

The Management shall guarantee the compliance of the outsourcing contract for the actuarial function with the outsourcing policy document.

The actuarial function shall contribute to a fluent relationship with Statutory Auditor, and Supervisor.

Swiss Branch

A Responsible Actuary is nominated by FINMA specifically for the Swiss Branch. The Responsible Actuary is responsible for ensuring that the entire tied assets required and the provisions (on the assets and liabilities side of the balance sheet) comply with the requirements of supervision law (art. 24 ISA). The Swiss Responsible Actuary and the Belgian actuarial function remain however in close contact as they need to exchange data and calculations.

8. Outsourcing

a) Policy

EMANI updates and discloses yearly an outsourcing policy to the NBB. The respect for this policy is compulsory every time a subcontracted activity can have a significant influence on the functioning of EMANI. The activity, the service or the process are assessed by:

- ✓ Strategic impact: The concerned activity is inherent to the status of EMANI;
- ✓ Significant impact on the control of the risks: the realisation of the tasks linked to the concerned activity implies significant risks and/or affects directly the control of the risks;
- ✓ Significant impact on the budget or the financial results: the realisation of the tasks linked to the concerned activity represents a significant cost and/or products a significant financial result.

For critical or important functions or activities, EMANI takes into account the different stages of the outsourcing cycle:

- (i) pre-contractual stage (monitoring conditions, due diligence of the service provider and performance of a risk assessment);
- (ii) contractual stage (content of the outsourcing agreement);
- (iii) post-contractual stage (outsourcing monitoring system and exit strategy).

EMANI also respects the recommendations of the NBB (Circular NBB_2020_18 on cloud outsourcing) to avoid undue operational risks in outsourcing activities to cloud service providers. Contracts with suppliers of cloud services were reviewed and renewed in respect of these recommendations.

In accordance with the Solvency II Law, when outsourcing a critical or important function or activity, EMANI notifies the NBB of its intention to do so and inform the NBB of any major developments relating to the function.

More information as well as the inventory can be found in the Outsourcing Policy of EMANI.

b) Staffing of supervision

The subcontracting reduces in no way the responsibility of the Executive Committee and the Board of EMANI whether regarding the Members, Supervisory Authorities or other shareholders EMANI has to keep ultimate responsibility of its activity.

For any subcontracted essential activity, the Executive Committee of EMANI will appoint in house a person in charge of the subcontracted function to whom it will delegate the correct application of the present policy. This person will be in charge in particular of defining the contents of the subcontracting, the necessary internal resources, the interfaces between the parties, the controlling of the subcontracting, the establishment of the assessment of the subcontracted function (economic profits vs risks) and the reporting to the Executive Committee.

The subcontracted organization of the outsourced function will have to allow a permanent control of the provider. The subcontracted organization will have in particular the obligation to raise any operational incident having an impact on the subcontracted activities, as well as in emergency situation. The process of subcontracting is resumed in the plan below. Each of the stages of the process is explained in the outsourcing policy.

The process of outsourcing withing EMANI is resumed in the plan below. Each of the stages of the process is detailed as described in the outsourcing policy and procedure manual.



Specific requirements for the Swiss Branch

FINMA has set supervisory requirements applicable to outsourcing solutions for branches of foreign insurance companies. Most requirements are already identified within this policy but some are specific whenever the Swiss Branch mandates a service provider to perform all or part of a function that is significant to the company’s business activities independently and on an ongoing basis.

An inventory of outsourced functions must be drawn up and kept up to date at all times. It must contain a description of the outsourced function and indicate the service provider (including subcontractors), the service recipient and the unit responsible within the outsourcing company.

Where security-relevant functions are outsourced (particularly in information technology), the Branch and the service provider must contractually agree security requirements.

The Branch, its audit firm and FINMA must be able to verify the service provider’s compliance with supervisory regulations. They must have the contractual right to inspect and audit all information relating to the outsourced function at any time without restriction. Outsourcing to another country is admissible if the Branch can expressly guarantee that it, its audit firm and FINMA can assert and enforce their right to inspect and audit information.

9. Risk profile

EMANI's Risk Management system, based on a top-down as well as bottom-up approach, covers all existing as well as evolving risks that have the potential to materially impact the adequacy of its financial resources, the volatility of its results or its ability to meet its commercial, legal and regulatory obligations. These risks include, but are not limited to, the following:

Insurance Risks (including reinsurance and claims)

Insurance risks refer to the risk of loss, or adverse change in the value of insurance liabilities, due to inadequate pricing and reserving practices. These risks may be caused by the fluctuations in timing, frequency and severity of insured events and claim settlements in comparison to the expectations at the time of underwriting.

Market Risk

Market risk is the risk of loss or adverse change in the financial position due to fluctuations in the level and in the volatility of market prices of assets, liabilities and financial instruments. This risk may be caused by fluctuations in foreign exchange rates, interest rates or equity, market liquidity, property and securities values.

Credit Risk

Credit risk is the risk of loss or adverse change in the financial position due to fluctuations in the credit standing of issuers of securities, reinsurers, counterparties or any other debtors.

Operational Risk

Operational risk, including compliance risk, refers to the risk of loss arising from inadequate or failed internal processes, people, systems, or from external events. This risk encompasses all functions rendered during conducting business, including strategy and business planning, underwriting, reinsurance purchasing, reserving, claims management, accounting, investments, treasury, information technology, legal and regulatory, and financial reporting functions.

Strategic Risk

Strategic risk is the risk of the current or prospective impact on earnings or capital arising from adverse business decisions, improper execution of decisions made, or lack of responsiveness to industry changes. Strategic Risk includes risks relating to accessing / raising capital, capital allocation, competition and maintaining ratings.

Emerging Risks

Emerging risks refer to risks that do not currently exist or are not currently recognised but have the potential to materially impact the adequacy of EMANI's financial and operational resources, the volatility of its results and expected financial income or its ability to meet its commercial, legal and regulatory obligations following changes in the environment.

Not all quantifiable risks have been explicitly formulated in the standard formula; furthermore, for some risks, it is generally assumed that the exposure is at all times not material enough and therefore a SCR quantification within the context of a standard formula would not be proportionate.

Finally, for some risks it would be inappropriate to cover them through pillar 1 capital requirements, but these should be covered instead through pillar 2 requirements and in particular Risk Management System requirements for appropriately monitoring and disclosing the risk profile of EMANI.

The following risks are not explicitly formulated in the standard model of Solvency II:

Inflation risk:

The sensitivity of the value of asset, liabilities and financial instruments to changes in the term structure of inflation rates, or in the volatility of inflation rate is not explicitly taken up as a separate risk sub-module. But for non-life business, the inflation risk is assumed implicitly in the calibration of the upward/downward interest rate shocks and in the reserve volatility parameter.

Reputation risk:

Reputational risk is the risk of potential loss through a deterioration of EMANI's reputation or standing due to a negative perception of its image among members, counterparties, shareholders or supervisory authorities. The risk related to the trustworthiness of EMANI resulting in loss of revenues is not covered in the standard formula. The operational risk module explicitly excludes reputation risk and risks arising from strategic decisions. Due to the limited amount of data or relevant information available on past events resulting in reputational risk does not permit reliable calibration of an SCR.

Throughout the strategic business, the underlying objective is to enhance the EMANI brand and capitalise on its reputation. The current success and brand name is an underlying assumption to achieving the overall corporate strategy. EMANI would accept informal complaints but, in case of a limited number of formal service complaints and cover disputes due to poor underwriting advice/ambiguity of cover terms, management actions are directly required. No form of regulatory or trade body censure tolerated.

Liquidity risk:

The risk that EMANI is unable to realise investments and other assets in order to settle their financial obligations when they fall due is not explicitly covered in the standard formula. It is assumed that a capital requirement to cover the liquidity risk would be ineffective and should be covered by an explicit liquidity risk management policy within the overall Risk Management System instead.

The liquidity risk has been tackled in the Risk Appetite Statement and is then considered as a key dimension in the Risk Management System. For ORSA purposes, we simulate a scenario which consider the levels of liquidity required both for day-to-day activities and in the event of large or catastrophe claims.

Legal environment risk:

The risk that EMANI is temporarily unable to adapt its risk profile in response to sudden or unexpected changes in the legal environment.

ESG Risks:

ESG generally means a broad set of environmental, social and corporate governance considerations that may impact EMANI's ability to execute our business strategy and create value over the long term.

10. Valuation for Solvency purposes

For the purpose of Solvency II, investments are reported at market value. Therefore, the unrealized capital gains or losses that are not reported in the Statutory balance sheet are added to the Basic Own Fund.

EMANI has asked the approval from the NBB to use the supplementary contribution as part of its eligible capital. The process to recall contributions will be performed according to the Articles of Association and the interpretation of them as agreed upon with the NBB. EMANI has received the annual approval for the use of calls in the Solvency calculation. In line with regulation, EMANI will only use the calls in the Solvency II calculation for maximum 50% of SCR.

The market value of the equities is the market price at 31 December. These unrealized capital gains or losses are the main contributor to the 'Asset adjustments' in the economical balance sheet.

Whereas the equalization reserve is considered as a technical reserve in the Statutory accounts, it is considered as Basic Own Funds in Solvency II. It is therefore the main contributor to the 'Liabilities adjustments' on the economical balance sheet.

The technical provisions under the Solvency II regime include the best estimates for claims and premiums together with the Solvency II Risk Margin and differ therefore from the statutory account by reason of:

- a discounting effect with the use of the yield curve provided by EIOPA;
- the inclusion of a risk margin as required in the EIOPA guidelines;
- the shift of the equalization reserve to the eligible own funds.



EUROPEAN MUTUAL ASSOCIATION FOR NUCLEAR INSURANCE

BALANCE SHEET AS OF 31 DECEMBER 2021

(Currency - Euro)

ASSETS	BE Gaap	Solvency II	Difference
C. Investments			
III. Other financial investments			
1. Parts in investment funds	311.381.442,65	339.038.596,37	+ 27.657.153,72
2. Bonds and other fixed interests	0,00	0,00	+ 0,00
6. Term deposits with financial institutions	6.180.469,72	6.180.766,04	+ 296,32
7. Other investments	104.560,00	0,00	- 104.560,00
Derivatives (Solvency II)	0,00	142.201,60	+ 142.201,60
	317.666.472,37	345.361.564,01	+ 27.695.091,64 (1)
D. bis Part of reinsurers in the technical reserves			
I. Reserve for non-earned premiums and current risks	3.846.539,00	0,00	- 3.846.539,00
III. Reserve for claims receivable	9.442.689,92	0,00	- 9.442.689,92
	13.289.228,92	0,00	- 13.289.228,92 (2)
Reinsurance recoverables (Solvency II regime)			
Premium provisions - Total recoverable from reinsurance	0,00	3.884.708,16	+ 3.884.708,16
Claims provisions - Total recoverable from reinsurance	0,00	9.476.899,86	+ 9.476.899,86
	0,00	13.361.608,02	+ 13.361.608,02 (2)
E. Receivables			
I. Receivables resulting from direct insurance	3.604.820,03	3.604.820,03	+ 0,00
1. Insurers	3.010.179,96	3.010.179,96	+ 0,00
2. Intermediaries of insurers	594.640,07	594.640,07	+ 0,00
II. Receivables resulting from reinsurance	1.423.727,24	1.423.727,24	+ 0,00
III. Other receivables	128.997,66	128.997,66	+ 0,00
IV. Subscribed capital, not paid			
	5.157.544,93	5.157.544,93	+ 0,00 (3)
F. Other assets			
I. Tangible assets	640.766,00	640.766,00	+ 0,00
II. Liquidity	37.786.214,66	37.790.064,61	+ 3.849,95
	38.426.980,66	38.430.830,61	+ 3.849,95 (4)
G. Transitory accounts			
I. Interests and rent	240.569,31	236.423,03	- 4.146,27
	240.569,31	236.423,03	- 4.146,28 (5)
TOTAL ASSETS	374.780.796,19	402.547.970,60	+ 27.767.174,40

(1) Whereas investments are reported at their book value under Belgium GAAP,

the Solvency II regime takes into account multiple factors :

- the initial value of the investments is the market value at the reference date (= date of the balance sheet)
- possible shocks on the assets related to interest rate risk, equity risk, property risk, spread risk, currency risk and concentration risk
- accrued interest

(2) Provisions for reinsurance under the Solvency II regime are discounted to their net present value (NPV) at reference date and reported as "Reinsurance recoverables"

(3) No adjustments under Solvency II

(4) Tangible assets (excl. real estate) are valued at their book value both under Belgian GAAP as Solvency II

Under Solvency II, the liquidities are valued at their nominal value including the accrued interests.

(5) Under the Solvency II regime, the amounts of accrued interests on assets are included in the value of the assets themselves.

BALANCE SHEET AS OF 31 DECEMBER 2021
(Currency - Euro)

LIABILITIES	BE Gaap	Solvency II	Difference
A. Equity			
I. Subscribed capital or equivalent fund, net of uncalled capital			
1. Guarantee fund securities	98.367.786,70	98.367.786,70	- 0,00
V. Retained earnings	566.584,82	566.584,82	- 0,00
Reconciliation reserve (Solvency II regime)			
Asset adjustments (1) - (2) - (3) - (4) - (5)	0,00	27.767.174,40	- 27.767.174,40
Liabilities adjustments (8) - (9) - (10)	0,00	261.837.485,05	- 261.837.485,05
Technical provisions adjustment (7)	0,00	-61.356.310,43	- 61.356.310,43
	98.934.371,52	327.182.720,54	+ 228.248.349,02 (6)
Technical provisions - non life (Solvency II regime)			
Best Estimate		44.074.494,39	
Best Estimate Premium provisions		12.740.970,76	
Best Estimate Claims provisions		31.333.523,63	
Risk Margin		17.281.816,04	
		61.356.310,43	+ 61.356.310,43 (7)
C. Technical reserves			
I. Reserve for unearned premiums and for unexpired risks	12.794.982,35	0,00	- 12.794.982,35
III. Reserve for claims payable	31.182.955,55	0,00	- 31.182.955,55
V. Reserve for equalisation and catastrophies	217.897.188,75	0,00	- 217.897.188,75
	261.875.126,65	0,00	- 261.875.126,65 (8)
G. Payables			
I. Payables resulting from direct insurance business	8.368.425,94	8.368.425,94	- 0,00
II. Payables resulting from reinsurance business	3.906.975,75	3.906.975,75	- 0,00
V. Other payables	897.511,82	935.153,42	- 37.641,60
1. Fiscal and social payables	461.167,78	461.167,78	- 0,00
a) Taxes	0,00	0,00	- 0,00
b) Social Payables	461.167,78	461.167,78	- 0,00
2. Other	436.344,04	331.784,04	- 104.560,00
Derivatives (Solvency II)	0,00	142.201,60	- 142.201,60
	13.172.913,51	13.210.555,11	+ 37.641,60 (9)
H. Transitory accounts	798.384,51	798.384,51	- 0,00
	798.384,51	798.384,51	+ 0,00 (10)
TOTAL LIABILITIES	374.780.796,19	402.547.970,60	+ 27.767.174,40

(6) Under Solvency II, the own funds are calculated as the excess of assets over other liabilities, and composed out of the capital and the reconciliation reserve

Non-eligible capital is cleared from the balance sheet (not mentioned as capital nor as reconciliation reserve)

The reconciliation reserve consists of the asset adjustments, liability adjustments and technical provision adjustments

(7) The technical provision is calculated as the sum of the Best Estimate (= discounted Premium and Claim reserves) and the Risk Margin (= additional capital buffer to be calculated using a cost of capital of 6% p.a. and discounted at the risk-free rate.)

(8) Solvency II does not recognize technical reserves. These reserves are transferred to

- technical provisions (subject to calculation of shocks and to a discount factor)

- own funds (subject to calculation of shocks and to a discount factor)

(9) There is no distinction between the origin of the payables under Solvency II.

If applicable, payables are valued at market value under Solvency II.

(10) Transitory accounts are valued at their nominal value under Solvency II

11. Capital Management

EMANI must implement a capital management available over a period corresponding to the business plan; the risk capacity is defined as the means used by the company to counter the negative consequences of the occurrence of a risk:

- Basic own funds;
- Ancillary own funds;
- others: human resource, IT systems, ALM...

EMANI has asked the approval from the NBB to use the supplementary contribution as part of its eligible capital. The process to recall contributions will be performed according to the Articles of Association and the interpretation of them as agreed upon with the NBB. EMANI has received the annual approval for the use of calls in the Solvency calculation and respects the limitations set out by EIOPIA in this respect (max 50% of SCR).

The Board has identified two capital measures that EMANI should take into account in setting its Medium-Term Capital requirement:

- Regulatory: based on the capital requirement set by reference to Solvency II, a Minimum of capital is calculated to ensure that EMANI is, and will continue to, operate where the level of risk-based capital is above a 100% solvency ratio. The margin in excess of 100%, the Target amount of capital, is the level of Solvency that is required to be consistent with the capital required to meet the EMANI's internal objective of 125%.
- Rating agency: the capital requirement is also judged against the alternative capital calculations from a rating agency; then the Target amount of capital is the amount of capital necessary to maintain an A rating of AmBest.

MCR & SCR RATIO - 31 December 2021

Total Basic own funds		327.182.720,54 ⁽¹¹⁾
- Own funds Tier I	334.389.995,54	(11a)
- refund Mutual members account	-7.207.275,00	(11b)
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		0,00 ^(11c)
Deductions for participations in financial and credit institutions		0,00
Ancillary own funds		0,00
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	222.996.477,00	
Eligible ancillary own funds		151.196.358,84 ⁽¹²⁾
Total eligible own funds to meet the SCR (11a) + (11b) + (12)		478.379.079,39 ⁽¹³⁾
Total eligible own funds to meet the MCR (11a) + (11b) with (11b) ≤ 20% of (16)		327.182.720,54 ⁽¹⁴⁾
Solvency Capital Requirement (SCR)		302.392.717,68 ⁽¹⁵⁾
Minimum Capital Requirement (MCR)		75.598.179,42 ⁽¹⁶⁾
Linear MCR	4.790.085,04	
MCR floor = 25% of (15)	75.598.179,42	
Absolute floor (if both Linear MCR and MCR floor below)	2.500.000,00	
SCR ratio (13)/(15)		158,20% ⁽¹⁷⁾
MCR ratio (14)/(16)		432,79% ⁽¹⁸⁾

(11) See Solvency II balance sheet.

(11c) Uncalled capital or called capital that is not payable within 3 months are considered as non-eligible own funds

(12) Supplementary members calls can be taken into account as ancillary own funds.

The amount of ancillary own funds is however limited to 50% of the SCR amount. = max 50% of (15) and subject to approval by the regulator

(13) Total eligible own funds is the sum total basic own funds and the eligible ancillary own funds

(13) Total eligible own funds to meet the SCR is the sum total basic own funds and the eligible ancillary own funds

(14) To determine the eligible own funds to meet the MCR, only the Basic own funds are taken into account = (11).

However the Tier II capital taken into account is limited to 20% of the MCR. (Eligible Tier II capital = max 20% of (16))

(15) See separate calculation sheet for the composition of the SCR

The SCR is the sum of market risks, default risk and non-life risk, after a correlation factor is applied.

(16) The linear MCR is calculated according to the Solvency II guidelines (standard formula non-life business).

The MCR is equal to the linear MCR, however a minimum of 25% of the SCR is applied

(17) The SCR ratio is calculated as the total eligible own funds to meet the SCR (13) divided by the SCR (15)

(18) The MCR ratio is calculated as the total eligible own funds to meet the MCR (14) divided by the MCR (16)

12. Status of the Solvency and Financial Condition Report

For practical reasons, the SFCR is written in a masculine version where we often use words as he or his. In EMANI, where we believe in equal rights, it is not more than normal that those words can be used if appropriate in their feminine form.

A Mutual is always in change. To avoid continuous and minor adaptations to the SFCR, the Executive Committee yearly evaluates and updates the document where necessary. A minimal improved version is too insignificant to be presented to the Board of Directors. However, major modifications that have a structural impact on the organization should be approved by the Board of Directors. Their consent will be expressed by the signature of the Managing Director.

Drawing- up date	31-03-2022
Latest Assessment Executive Committee	31-03-2022
Brought to the Board	02-06-2022

Approved by,



.....
M. Vercammen
Finance Manager



.....
T. Houben
Chief Risk Officer



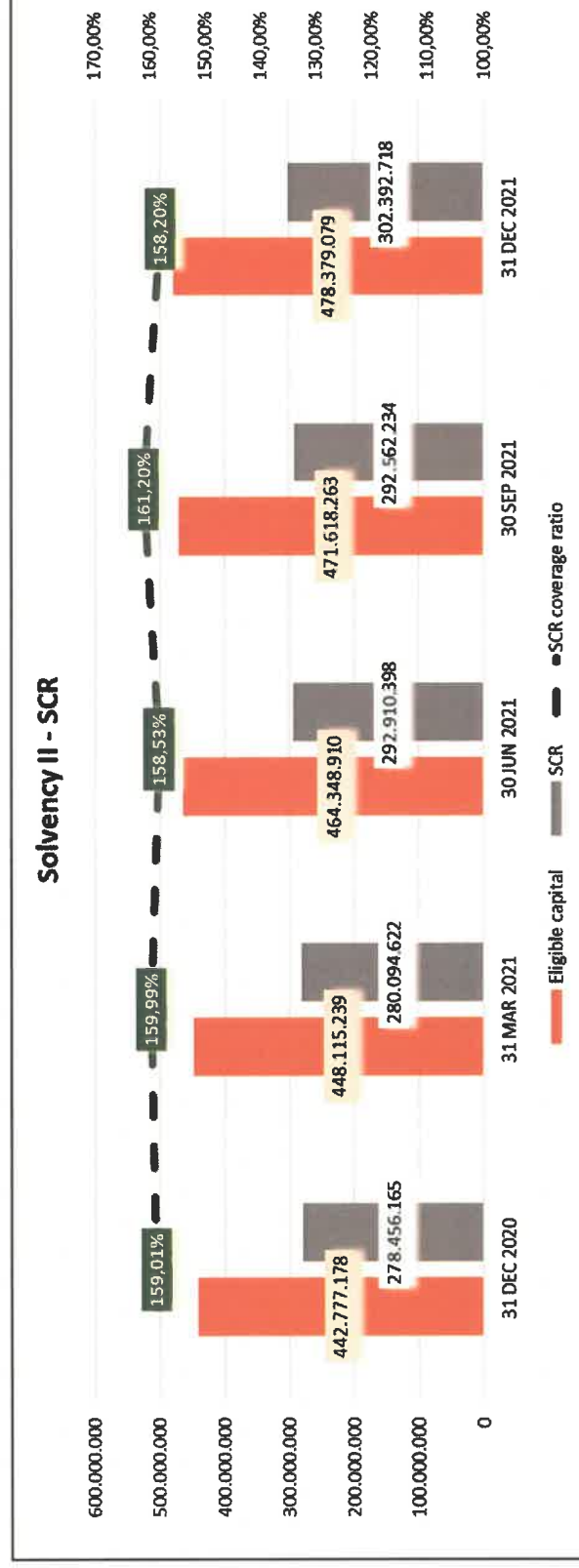
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P. Vandekerckhove
Managing Director

Annex

Annex

Annex 1: SCR evolution

	31 DEC 2020	31 MAR 2021	Change to 31 DEC 2020	30 JUN 2021	Change to 31 MAR 2021	30 SEP 2021	Change to 30 JUN 2021	31 DEC 2021	Change to 30 SEP 2021
SCR	278.456.165	280.094.622	+1%	292.910.398	+5%	292.562.234	-0%	302.392.718	+3%
Eligible capital	442.777.178	448.115.239	+1%	464.348.910	+4%	471.618.263	+2%	478.379.079	+1%
surplus	164.321.013	168.020.617	+2%	171.438.512	+2%	179.056.029	+4%	175.986.362	-2%
SCR coverage ratio	159,01%	159,99%	+1%	158,53%	-1%	161,20%	+3%	158,20%	-3%



Annex 2: list of critical functions that are outsourced

	description of reason of critical function or		
	description of outsourced function or activity	activity	name of service provider
1.	internal audit	independent control function	BDO represented by Christophe Qiuévrioux
2.	actuary	independent control function	Veerle Nicolai
3.	first line support, installation of new lap tops (helpde	IT activities & infrastructure	ARCO Information N.V.
4.	File & Printserver hosting	IT activities & infrastructure	ARCO Information N.V.
5.	Accounting server and software hosting - Backup solution Office365 data	IT activities & infrastructure	ARCO Information N.V.
6.	Microsoft Customer Agreement	IT activities & infrastructure	Microsoft Ireland Opertions Limited
7.	financial asset management	specialised independent management of assets	AVIVA
8.	financial asset management	specialised independent management of assets	JP Morgan
9.	financial asset management	specialised independent management of assets	KBC
10.	custodian partner	specialised independent management of assets	State Street
11.	insurance brokerage, independent insurance, intermediaries, agent, availability of insurance cover	management of the core business, insurance activities	BPL Global
12.	insurance brokerage, independent insurance, intermediaries, agent, availability of insurance cover	management of the core business, insurance activities	AON
13.	re-insurance: brokers	management of the core business, insurance activities	JLT = Marsh
14.	claims expert	expertise in case of a claim	TEXA
15.	insurance: claims expert	management of the core business, insurance activities	Crawford

				Solvency II value	Statutory accounts value	Reclassification adjustments	
				C0010	C0020	EC0021	
Assets	Goodwill		R0010		0		
	Deferred acquisition costs		R0020		0		
	Intangible assets		R0030	0	0		
	Deferred tax assets		R0040	0	0		
	Pension benefit surplus		R0050	0	0		
	Property, plant & equipment held for own use		R0060	640.766,00	640766		
	Investments (other than assets held for index-linked and unit-linked contracts)		R0070	345.361.564,01	317666472,4		
		Collective Investments Undertakings	R0180	339.038.596,37	311381442,7		
		Derivatives	R0190	142.201,60	104560		
		Deposits other than cash equivalents	R0200	6.180.766,04	6180469,72		
		Other investments	R0210	0	0		
	Reinsurance recoverables from:		R0270	13300300,53	13289228,92		
		Non-life and health similar to non-life		R0280	13300300,53	13289228,92	
			Non-life excluding health	R0290	13300300,53	13289228,92	
			Health similar to non-life	R0300	0	0	
		Life and health similar to life, excluding health and index-linked and unit-linked		R0310	0	0	
			Health similar to life	R0320	0	0	
			Life excluding health and index-linked and unit-linked	R0330	0	0	
		Life index-linked and unit-linked	R0340	0	0		
		Deposits to cedants		R0350	0	0	
		Insurance and intermediaries receivables		R0360	3604820,03	3604820,03	
	Reinsurance receivables		R0370	1423727,24	1423727,24		
	Receivables (trade, not insurance)		R0380	128997,66	128997,66		
	Own shares (held directly)		R0390	0	0		
	Amounts due in respect of own fund items or initial fund called up but not yet paid in		R0400	0	0		
	Cash and cash equivalents		R0410	37790064,61	37786214,66		
	Any other assets, not elsewhere shown		R0420	236423,03	240569,31		
Total assets		R0500	402.486.663,11	374780796,2			
Liabilities	Technical provisions – non-life	Technical provisions – non-life (excluding health)		R0510	61355722,19	261875126,7	
			Technical provisions calculated as a whole	R0530			
			Best Estimate	R0540	44074494,39		
		Risk margin	R0550	17281227,8			
		Technical provisions - health (similar to non-life)		R0560	0	0	
			Technical provisions calculated as a whole	R0570	0		
			Best Estimate	R0580	0		
		Risk margin	R0590	0			
		Derivatives		R0790	142.201,60	0	
	Insurance & intermediaries payables		R0820	8368425,94	8368425,94		
	Reinsurance payables		R0830	3906975,75	3906975,75		
	Payables (trade, not insurance)		R0840	792951,82	897511,82		
	Subordinated liabilities		R0850	0	0		
		Subordinated liabilities not in Basic Own Funds	R0860	0	0		
Subordinated liabilities in Basic Own Funds		R0870	0	0			
Any other liabilities, not elsewhere shown		R0880	798384,51	798384,51			
Total liabilities		R0900	75364661,81	275846424,7			
Excess of assets over liabilities		R1000	327.122.001,30	98934371,52			

			Fire and other damage to property insurance		
			C0070	C0200	
Premiums written	Gross - Direct Business	R0110	46.428.983,81	46.428.983,81	
	Gross - Proportional reinsurance accepted	R0120	0,00	0,00	
	Gross - Non-proportional reinsurance accepted	R0130		0,00	
	Reinsurers' share	R0140	21.054.667,57	21.054.667,57	
	Net	R0200	25.374.316,24	25.374.316,24	
Premiums earned	Gross - Direct Business	R0210	44.341.827,05	44.341.827,05	
	Gross - Proportional reinsurance accepted	R0220	0,00	0,00	
	Gross - Non-proportional reinsurance accepted	R0230		0,00	
	Reinsurers' share	R0240	20.220.212,57	20.220.212,57	
	Net	R0300	24.121.614,48	24.121.614,48	
Claims incurred	Gross - Direct Business	R0310	-783.370,27	-783.370,27	
	Gross - Proportional reinsurance accepted	R0320	0,00	0,00	
	Gross - Non-proportional reinsurance accepted	R0330		0,00	
	Reinsurers' share	R0340	-206.596,69	-206.596,69	
	Net	R0400	-576.773,58	-576.773,58	
Changes in other technical provisions	Gross - Direct Business	R0410	0,00	0,00	
	Gross - Proportional reinsurance accepted	R0420	0,00	0,00	
	Gross - Non- proportional reinsurance accepted	R0430		0,00	
	Reinsurers' share	R0440	0,00	0,00	
	Net	R0500	0,00	0,00	
Expenses Incurred		R0550	4.754.102,01	4.754.102,01	
	Administrative expenses	Gross - Direct Business	R0610	4.250.169,54	4.250.169,54
		Gross - Proportional reinsurance accepted	R0620	0,00	0,00
		Gross - Non-proportional reinsurance accepted	R0630		0,00
		Reinsurers' share	R0640	0,00	0,00
		Net	R0700	4.250.169,54	4.250.169,54
	Investment management expenses	Gross - Direct Business	R0710	578.903,67	578.903,67
		Gross - Proportional reinsurance accepted	R0720	0,00	0,00
		Gross - Non-proportional reinsurance accepted	R0730		0,00
		Reinsurers' share	R0740	0,00	0,00
		Net	R0800	578.903,67	578.903,67
	Claims management expenses	Gross - Direct Business	R0810	-74.971,20	-74.971,20
		Gross - Proportional reinsurance accepted	R0820	0,00	0,00
		Gross - Non-proportional reinsurance accepted	R0830		0,00
		Reinsurers' share	R0840	0,00	0,00
		Net	R0900	-74.971,20	-74.971,20
	Acquisition expenses	Gross - Direct Business	R0910	0,00	0,00
		Gross - Proportional reinsurance accepted	R0920	0,00	0,00
		Gross - Non-proportional reinsurance accepted	R0930		0,00
		Reinsurers' share	R0940	0,00	0,00
		Net	R1000	0,00	0,00
	Overhead expenses	Gross - Direct Business	R1010	0,00	0,00
		Gross - Proportional reinsurance accepted	R1020	0,00	0,00
		Gross - Non-proportional reinsurance accepted	R1030		0,00
		Reinsurers' share	R1040	0,00	0,00
Net		R1100	0,00	0,00	
Other expenses		R1200		0,00	
Total expenses		R1300	4.754.102,01	4.754.102,01	

				Fire and other damage to property insurance			
				C0080			
Technical provisions calculated as a whole	Direct business			R0010	0,00		
				R0020	0,00		
	Accepted proportional reinsurance business			R0030			
	Accepted non-proportional reinsurance			R0040	0,00		
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole				R0050			
Technical provisions calculated as a sum of BE and RM	Best estimate	Premium provisions	Gross - Total	R0060	0,00		
			Gross - direct business	R0070	12.740.970,76		
			Gross - accepted proportional reinsurance business	R0080	12.740.970,76		
			Gross - accepted non-proportional reinsurance business	R0090	0,00		
			Total recoverable from reinsurance/SPV and Finite Re before the adjustment for expected losses due to counterparty default	R0100	3.854.054,41		
			Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses	R0110			
			Recoverables from SPV before adjustment for expected losses	R0120	3.854.054,41		
			Recoverables from Finite Reinsurance before adjustment for expected losses	R0130	0,00		
			Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140	0,00		
			Net Best Estimate of Premium Provisions	R0150	3.823.400,67		
			Claims provisions	Gross - Total	Gross - direct business	R0160	8.917.570,09
					Gross - accepted proportional reinsurance business	R0170	31.333.523,63
					Gross - accepted non-proportional reinsurance business	R0180	31.333.523,63
					Total recoverable from reinsurance/SPV and Finite Re before the adjustment for expected losses due to counterparty default	R0190	0,00
					Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses	R0200	9.493.828,72
					Recoverables from SPV before adjustment for expected losses	R0210	
					Recoverables from Finite Reinsurance before adjustment for expected losses	R0220	9.493.828,72
					Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0230	0,00
					Net Best Estimate of Claims Provisions	R0240	0,00
					Total Best estimate - gross	R0250	9.476.899,86
	R0260	21.856.623,77					
	R0270	44.074.494,39					
	R0280	30.774.193,86					
	R0290	17.281.227,80					
	R0300	0,00					
	R0310	0,00					
	R0320	61.355.722,19					
	R0330						
	R0340	13.300.300,53					
	R0350	48.055.421,66					
	R0360	1,00					
	R0370	12.740.970,76					
	R0380	0,00					
	R0390	0,00					
	R0400	0,00					
	R0410	31.333.523,63					
	R0420	0,00					
	R0430	0,00					
	R0440	0,00					
	R0450	0,00					
	R0460	0,00					
	R0470	61.355.722,19					
	R0480						
	R0490	0,00					
	R0500	61.355.722,19					

		In Current year	Sum of years (cumulative)
		C0170	C0180
Prior	R0100	0,00	0,00
N-14	R0110	0,00	0,00
N-13	R0120	0,00	0,00
N-12	R0130	0,00	0,00
N-11	R0140	554,95	554,95
N-10	R0150	0,00	554,95
N-9	R0160	0,00	554,95
N-8	R0170	0,00	554,95
N-7	R0180	0,00	554,95
N-6	R0190	0,00	554,95
N-5	R0200	0,00	554,95
N-4	R0210	706.795,12	707.350,07
N-3	R0220	0,00	707.350,07
N-2	R0230	2.168.544,00	2.875.894,07
N-1	R0240	3.092.058,65	5.967.952,72
N	R0250	0,00	5.967.952,72
Total	R0260	5.967.952,72	5.967.952,72

gross claims paid

		Year end (discounted data)
		C0360
Prior	R0100	0,00
N-14	R0110	0,00
N-13	R0120	0,00
N-12	R0130	0,00
N-11	R0140	0,00
N-10	R0150	0,00
N-9	R0160	0,00
N-8	R0170	0,00
N-7	R0180	0,00
N-6	R0190	0,00
N-5	R0200	0,00
N-4	R0210	0,00
N-3	R0220	0,00
N-2	R0230	29.242.503,49
N-1	R0240	386.385,31
N	R0250	1.554.066,73
Total	R0260	31.182.955,53

gross claims reserve

		In Current year	Sum of years (cumulative)
		C0760	C0770
Prior	R0300	0,00	0,00
N-14	R0310	0,00	0,00
N-13	R0320	0,00	0,00
N-12	R0330	0,00	0,00
N-11	R0340	554,95	554,95
N-10	R0350	0,00	554,95
N-9	R0360	0,00	554,95
N-8	R0370	0,00	554,95
N-7	R0380	0,00	554,95
N-6	R0390	0,00	554,95
N-5	R0400	0,00	554,95
N-4	R0410	236.434,61	236.989,56
N-3	R0420	0,00	236.989,56
N-2	R0430	871.185,98	1.108.175,54
N-1	R0440	583.398,70	1.691.574,24
N	R0450	0,00	1.691.574,24
Total	R0460	1.691.574,24	1.691.574,24
RI PAID			

		Year end (discounted data)
		C0960
Prior	R0300	0
N-14	R0310	0
N-13	R0320	0
N-12	R0330	0
N-11	R0340	0
N-10	R0350	0
N-9	R0360	0
N-8	R0370	0
N-7	R0380	0
N-6	R0390	0
N-5	R0400	0
N-4	R0410	0
N-3	R0420	0
N-2	R0430	9.273.195
N-1	R0440	72.892
N	R0450	96.603
Total	R0460	9.442.689,92
RI RESERVE DISCOUNTED BE		

S.22.01

Not reported as no LTG measures or transitionals are applied.

S.23.01.01.01 & S.23.01.01.02

		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 88 of Delegated Regulation 2015/35	Ordinary share capital (gross of own shares)	R0010	0,00	0,00		0,00
	Share premium account related to ordinary share capital	R0030	0,00	0,00		0,00
	Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040	98.934.371,52	98.934.371,52		0,00
	Subordinated mutual member accounts	R0050	0,00		0,00	0,00
	Surplus funds	R0070	0,00	0,00		
	Preference shares	R0090	0,00		0,00	0,00
	Share premium account related to preference shares	R0110	0,00		0,00	0,00
	Reconciliation reserve	R0130	228.187.629,78	228.187.629,78		
	Subordinated liabilities	R0140	0,00		0,00	0,00
	An amount equal to the value of net deferred tax assets	R0160	0,00			0,00
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	0,00				
Deductions	Deductions for participations in financial and credit institutions	R0230	0,00	0,00	0,00	0,00
Total basic own funds after deductions	R0290	327.122.001,30	327.122.001,30	0,00	0,00	0,00
Ancillary own funds	Unpaid and uncalled ordinary share capital callable on demand	R0300	0,00			0,00
	Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310	0,00			0,00
	Supplementary members called - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370	222.996.477,00			222.996.477,00
	Other ancillary own funds	R0380	0,00			0,00
	Total ancillary own funds	R0400	222.996.477,00			222.996.477,00
Available and eligible own funds	Total available own funds to meet the SCR	R0500	550.118.478,30	327.122.001,30	0,00	222.996.477,00
	Total available own funds to meet the MCR	R0510	327.122.001,30	327.122.001,30	0,00	0,00
	Total eligible own funds to meet the SCR	R0540	478.318.360,14	327.122.001,30	0,00	151.196.358,84
	Total eligible own funds to meet the MCR	R0550	327.122.001,30	327.122.001,30	0,00	0,00
SCR	R0580	302.392.717,68				
MCR	R0600	75.598.179,42				
Ratio of Eligible own funds to SCR	R0620	1,5818				
Ratio of Eligible own funds to MCR	R0640	4,3271				

		C0060	
Reconciliation reserve	Excess of assets over liabilities	R0700	327.122.001,30
	Own shares (held directly and indirectly)	R0710	
	Foreseeable dividends, distributions and charges	R0720	
	Other basic own fund items	R0730	98.934.371,52
	Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	
	R0760	228.187.629,78	
Expected profits	Expected profits included in future premiums (EPIFP) - Life business	R0770	0,00
	Expected profits included in future premiums (EPIFP) - Non-life business	R0780	0,00
Total Expected profits included in future premiums (EPIFP)	R0790	0,00	

		Total	Tier 1		Tier 2		Tier 3
			Of which counted under transitionals		Of which counted under transitionals		
		C0010	C0020	C0030	C0040	C0050	C0060
Ordinary share capital	Paid in	R0010					
	Called up but not yet paid in	R0020					
	Own shares held	R0030					
Total ordinary share capital		R0100					
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual type undertakings	Paid in	R0110	98.934.371,52	98.934.371,52			
	Called up but not yet paid in	R0120					
Total initial fund members' contributions or the equivalent basic own fund item for mutual and mutual type undertakings		R0200	98.934.371,52	98.934.371,52			
Subordinated mutual members accounts	Dated subordinated	R0210					
	Undated subordinated with a call option	R0220					
	Undated subordinated with no contractual opportunity to redeem	R0230					
Total subordinated mutual members accounts		R0300					
Preference shares	Dated preference shares	R0310					
Total subordinated liabilities		R0500					

		Tier 2		Tier 3	
		Initial amounts approved	Current amounts	Initial amounts approved	Current amounts
		C0070	C0080	C0090	C0100
Ancillary own funds	Items for which an amount was approved	R0510			
	Items for which a method was approved	R0520	222.996.477,00		

		Net solvency capital requirement	Gross solvency capital requirement	Allocation from adjustments due to RFF and Matching adjustments portfolios
		C0030	C0040	C0050
Market risk	R0010	58.233.328	58233328,03	0
Counterparty default risk	R0020	6.005.894	6005893,62	0
Life underwriting risk	R0030	0	0	0
Health underwriting risk	R0040	0	0	0
Non-life underwriting risk	R0050	277.980.499	277980498,7	0
Diversification	R0060	-41.157.257	-41157257,42	
Intangible asset risk	R0070	0	0	
Basic Solvency Capital Requirement	R0100	301.062.463	301062462,9	

			Value
			C0100
Adjustment due to RFF/MAP nSCR aggregation		R0120	0,00
Operational risk		R0130	1.330.254,81
Loss-absorbing capacity of technical provisions		R0140	0,00
Loss-absorbing capacity of deferred taxes		R0150	
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC		R0160	0,00
Solvency Capital Requirement excluding capital add-on		R0200	302.392.717,69
Capital add-on already set		R0210	0,00
Solvency capital requirement		R0220	302.392.717,69
Other information on SCR	Capital requirement for duration-based equity risk sub-module	R0400	0,00
	Total amount of Notional Solvency Capital Requirements for remaining part	R0410	
	Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420	0,00
	Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	R0430	0,00
	Diversification effects due to RFF nSCR aggregation for article 304	R0440	0,00
	Method used to calculate the adjustment due to RFF/MAP nSCR aggregation	R0450	4 - No adjustment
	Net future discretionary benefits	R0460	0,00

S.28.01 (reference)

MCR - Both life and non-life insurance activity	75.598.179
Linear MCR	4.795.848
SCR	302.392.718
MCR cap	136.076.723
MCR floor	75.598.179
Combined MCR	75.598.179
Absolute floor of the MCR	2.500.000

