# Maersk Insurance A/S Solvency and Financial Condition Report Financial Year ended 31<sup>st</sup> December 2022

# **Executive Summary**

Due to the harmonised EU-wide regulatory regime for Insurance Companies, known as Solvency II, all insurers need to publish a Solvency and Financial Condition Report ("SFCR") on the Company's public website. This is the SFCR report published by Maersk Insurance A/S (MIAS).

This report covers the Business and Performance of MIAS, its System of Governance, Risk Profile, Valuation for Solvency Purposes and Capital Management. The ultimate responsibility for all these matters is with MIAS' Board of Directors with the support of various governance and control functions that have been put in place to monitor and manage the business.

MIAS is an active retention vehicle for A. P. Moller – Maersk A/S and its subsidiaries, and the focus of the Board and Management Team is the orderly management of the existing book of policies in line with their policy terms and conditions.

MIAS's strategy is to insure assets, liabilities, obligations and employees of A.P. Moller – Maersk A/S or its subsidiaries or assets, liabilities, obligations and employees under management control of A.P. Moller-Maersk A/S or its subsidiaries. MIAS is required to hold sufficient capital to match its policyholder liabilities at all times and a primary responsibility of the Board is to ensure that MIAS's capital is adequate to cover the required solvency for the nature and scale of the business and the expected operational requirements of the business. A number of mechanisms are in place to evaluate those levels and the outcome of those assessments indicate that MIAS's capital is adequate at this time and for the expected requirements in the short to medium term.

The board of MIAS is involved in strategic decisions as well as significant decisions which fall outside the scope of the management.

MIAS has to a large extent outsourced the operation, including Risk Management, Compliance, Actuarial, Underwriting, Reinsurance, Claims handling, Legal, Tax, Accounting, Investment, Reporting, IT, etc. Underwriting, Reinsurance, Claims handling, Legal, Tax, Accounting, Investment, Reporting and IT are outsourced to the parent company. The Risk Management, Actuarial and Compliance functions are outsourced to external parties.

The Risk Management function operates under the defined policies and guidelines, continuously monitoring the risk exposure and maintaining a risk register covering Strategic risks, Operational risks, Market risks, Underwriting risks and Default risks. MIAS' management is informed of any significant changes to the risk picture, on a regular basis.

The insurance risks MIAS carries, i.e. mainly property and casualty risks for Marine, Logistics and Terminals and Employee Benefit Insurance, are aligned with the limits stated in the risk appetite and strategy, as established by the Board of Directors. MIAS protects itself against cumulative risk by capping its exposure at fixed maximum liability amounts through reinsurance. Once a year, MIAS performs and reports an Own Risk Solvency Assessment (ORSA) to the Danish FSA. MIAS' assets, technical provisions and other liabilities are valuated under Solvency II.

The management of own funds is governed by the Policy for Capital Structure where the overall responsibility and tasks are defined. According to this policy, the equity of the company must be sufficient to ensure the continued operation of the company and at the same time sufficient to meet all regulatory requirements. The company is constantly focusing on matters which might influence the capital structure, e.g. the company's investment policy. The value creation of the company is meant to primarily be generated from acceptance of insurance risk rather than by acceptance of investment risk. The time horizon for business planning including development of own funds is minimum 3 years.

MIAS' underwriting result (Technical Profit) for 2022 was a profit of USD 59.145 thousand and the solvency ratio by end of 2022 was 317 %.

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# A. Business and Performance

# A.1 Business

Maersk Insurance A/S (MIAS) was established 28 February 2011 and started operation 1 January 2012. MIAS operates as a risk retention vehicle for A.P. Moller - Maersk and its subsidiaries.

The Company name is:	Maersk Insurance A/S
The Company address is:	Esplanaden 50, 1098 Copenhagen K, Denmark

MIAS is incorporated as a privately owned company with limited liability (A/S: Aktieselskab) and is a 100 % owned subsidiary of A. P. Moller - Maersk A/S. MIAS has granted a loan to the parent company A.P. Moller - Maersk A/S according to permission from the Danish Financial Supervisory Authority (Finanstilsynet). The loan yields interest at arm's length basis. MIAS has entered into an agreement with A.P. Moller - Maersk A/S related to fees for various services for insurance operation.

MIAS is domiciled in Denmark and is under supervision from the Danish Financial Supervisory Authority (DFSA), Strandgade 29, 1401 Copenhagen K, and Maersk Insurance A/S´ main contact person at DFSA is: Birgitta Nielsen.

MIAS has license to conduct direct insurance and reinsurance business for the below listed non-life insurance classes:

- 1 (Accident)
- 2 (Illness/Health)
- 6 (Fully comprehensive insurance for ships)
- 8 (Fire and natural forces)
- 9 (Other damage to property)
- 12 (Third party liability for ships)
- 13 (General liability)
- 16 (Miscellaneous financial losses)

In addition to these classes MIAS conducts reinsurance businesses for the life insurance class:

• lc (complementary life insurance)

MIAS is audited by PriceWaterhouseCoopers (PWC), Strandvejen 44, 2900 Hellerup, and Maersk Insurance A/S´ main contact person at PWC is: Per Rolf Larssen.

As per 1<sup>st</sup> of January 2023, the MIAS's Board of Directors consists of:

- Niclas Erlandson (Chairman)
- •
- Martin Herrstedt
- Fatiha Benali
- Ingrid Ebner
- Leonardo Sonzio

MIAS has an audit committee, including an external independent member with accounting and audit qualifications. The committee consists of board members and one independent, external member. Fatiha Benali has been appointed by the board as the external member and is the Chairman of the audit committee.

MIAS's management consists of three part-time employees:

- Lars Henneberg (MD), who holds both the Actuarial (Non-Life), Risk Management and the Compliance key functions
- Steen Ragn, Key function for Actuarial (Life) and the appointed actuary
- Lotte Petersen, who holds the Internal Audit key function as of November 2022

MIAS has to a large extent outsourced the operation, including Risk Management, Compliance, Actuarial, Underwriting, Reinsurance, Claims handling, Legal, Tax, Accounting, Investment, Reporting, IT, etc. Underwriting, Reinsurance,

Claims handling, Legal, Tax, Accounting, Investment, Reporting and IT are outsourced to the parent company. The Risk Management, Actuarial and Compliance functions are outsourced to external parties.

Further, MIAS operates through fronting companies in order to reduce the operational tasks to a minimum and to benefit from the operational efficiencies of large global insurance carriers. The fronting activities consist predominately of policy administration and to some extent underwriting and claims handling. Separate claims handing agreements with third parties have also been entered into.

MIAS underwrites risks within the business areas of Marine, Logistics and Terminals. MIAS underwrites non-life business such as Property and Casualty classes. As from 1<sup>st</sup> of January 2020, MIAS also underwrites Life, Disability, Medical and Accident.

More specifically, MIAS underwrites coverages for Property Damage, Hull and Machinery, incl. Collision Liability, Owner Total Loss Interest, War coverage, Natural Catastrophe, Business Interruption, Construction All Risk, General Liability, Umbrella Liability, Employment Practices Liability, Pension Trustee Liability, and Specialty Risk, Terminal Operators Loss, Freight Services Liability, Cyber and Employee Benefits.

MIAS underwrites risk both as reinsurance and as direct insurance in non-life and reinsurance in life.

MIAS mitigates and protects the capital by procurement of reinsurance and retrocession. In accordance with MIAS's reinsurance policy, all reinsurers must have a minimum A- rating by Standard & Poor's or similar. The reinsurance enables MIAS to operate as both a net line and a gross line insurance provider in order to reduce volatility and create diversification as a response to a changing insurance market. Further, the use of reinsurance creates a platform for MIAS to respond to market dynamics, both when the market is softening through overcapacity of capital due to increased competition between insurance carriers with growth strategies, or when the market is hardening, and the capital is withdrawn from the insurance market and the competition is less efficient.

# A.2 Insurance Results

MIAS underwrites risks within the business areas of which MIAS holds a license – see A.1.

MIAS's gross written premium in 2022 was USD 210.396 thousand with a return on equity of 21 %. MIAS's Underwriting profit (Technical Profit) for 2022 amounts to a profit of USD 61.942 thousand (2021: profit of USD 18.039 thousand).

Year	Total gross written premium	Total net earned premium	Total gross claims incurred	Total net claims incurred	Operating Expenses	Profit before tax	Combined ratio
2012	69.531	45.112	-30.768	-30.768	-2.736	12.121	74%
2013	49.919	50.797	-33.960	-33.960	-2.567	14.599	73%
2014	82.075	59.579	-28.360	-28.360	-1.557	30.365	59%
2015	76.445	54.239	-45.633	-40.458	-258	14.580	82%
2016	50.200	23.129	-3.360	-429	1.628	26.380	60%
2017	52.060	4.531	-23.043	-1.451	2.864	8.935	89%
2018	60.292	12.217	-99.099	-3.299	3.282	16.766	79%
2019	135.001	34.432	-19.997	-15.248	437	24.841	74%
2020	35.068	63.871	-85.795	-66.152	-1.872	-413	104%
2021	141.406	88.835	-79.337	-65.991	-4.828	18.553	87%
2022	210.396	132.267	-65.259	-71.915	-2.772	67.053	72%

All monetary values are in USD thousands

The 2022 Underwriting results split per industry segment:

Segment	Gross premium written	Gross premium income	Gross claims incurred	Gross operating expenses*	Result of ceded business	Technical Result	Profit before tax
Marine	86.762	86.762	-24.415	-787	-41.230	19.963	
Fire	30.922	30.912	3.098	-521	-14.357	21.017	
General Liability	51.721	51.721	-19.471	189	-12.473	19.273	
Miscellaneous Financial Loss	10.030	10.093	190	261	-13.997	-3.306	
Income Protection	4.639	4.606	-4.202	-345	0	-84	
Medical Expense Insurance	22.704	20.388	-18.145	-1.502	-374	380	
Life Reinsurance	3.617	3.559	-1.634	-67	0	1.901	
Total	210.396	208.041	-64.579	-2.772	-82.431	59.145	67.053

\*including reinsurance commission

All values are in USD thousands

For 2023, MIAS expects profitable growth and further centralisation of the insurance procurement and deployment of MIAS accordingly. The continuing consolidation of Group risks to a centralised operation from local procurement, supports MIAS's strategy to underwrite additional risks and deploy the capital most efficiently. Budgets and projections have been made on the existing business model to further develop the company to the benefit of the Group. The company expects a modest positive result for 2023.

# A.3 Investment Results

MIAS's investments have a low risk profile. MIAS is required to maintain assets to match the policyholder's liabilities at all times. MIAS invests in accordance with the investment policy approved by the Board of Directors.

The asset management is outsourced to the parent company. MIAS's investment policy reflects MIAS's risk appetite. Investments are predominately made in short-term deposits, and in a loan to the parent company.

The investment income is benchmarked up against an adequate index and is reported on a monthly basis to the management and to the board.

MIAS's investment portfolio and the result from Investment activities:

Instrument	2022	2021	2020	2019	2018	2017	2016	2015
Interest on Danish mortgage bonds						75	75	75
Interest on Government bonds						498	985	1.189
Interest loan APMM	3.636	634	2.844	3.680	3.120	1.225	973	391
Interest deposits	3.206	-62	-190	331	-99	31	-115	6
Value adjustments	-165	-35	1.102	1.237	1.545	1.162	188	-315
Total	6.677	537	3.756	5.248	4.566	2.991	2.106	1.346

All values are in USD thousands

The result of the investment activities was satisfactory.

# A.4 Results of other Activities

MIAS does not perform other activities generating other income or results.

# A.5 Any other information

All relevant information for MIAS' business and performance is given in the above sections.

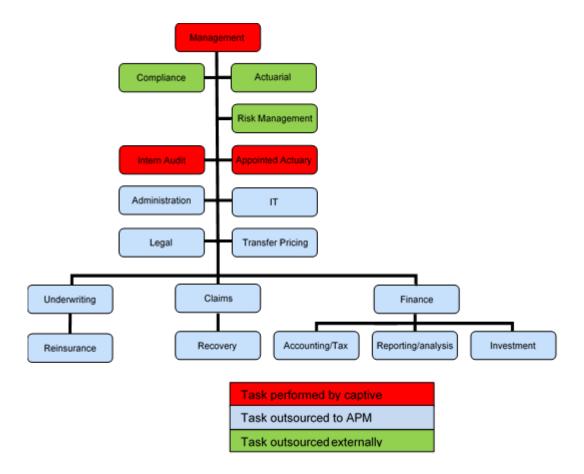
# B. Management System

# **B.1** General Remarks

MIAS has to a large extent outsourced the operation, including Risk Management, Compliance, Actuarial, Underwriting, Reinsurance, Claims handling, Legal, Tax, Accounting, Investment, Reporting, IT, etc.

Underwriting, Reinsurance, Claims handling, Legal, Tax, Accounting, Investment, Reporting and IT are outsourced to the parent company.

Support functions for the Risk Management, Actuarial and Compliance key functions are outsourced to external parties.



MIAS's management consists of three part-time employees:

- Lars Henneberg (Managing Director), who holds both the Actuarial (Non-Life), Risk Management and the Compliance key functions
- Steen Ragn, Key function for Actuarial (Life) and the appointed actuary
- Lotte Petersen, who holds the Internal Audit key function as of November 2022

Lars Henneberg is also Managing Director, and Lars Henneberg, Steen Ragn and Lotte Petersen are the only employees of MIAS as all the other functions are outsourced.

Under Lars Henneberg's guidance and leadership, EY is hired to perform the duties of the compliance, risk management and actuarial function.

## **B.2** Fitness and Propriety (Fit and Proper)

#### Legal requirement

FIL § 64 defines the requirements which individual members of the board and the management of financial companies must meet with regard to fit and proper requirements.

#### Individual requirements for suitability - Fit and Proper assessment

The requirements for Fit & Proper imply that members of the Board and the management must:

- have sufficient knowledge, skills, and experience to carry out the duties in the company
- have a good reputation
- not become subject to criminal liability
- not be in bankruptcy
- not have caused the company a loss or risk of loss

The above requirements must be fulfilled from the time of appointment of the key persons throughout the period of duties.

The managing director and the board of directors are fit and proper.

## **B.3** Risk management and ORSA

MIAS's Managing Director must keep the Chairman of the Board informed of all issues of significant relevance to MIAS. The following issues must be presented to the Board for approval:

- loan agreements, guarantees, or security which are not part of the usual business
- significant changes in existing agreements with bank connections
- purchase, sale, or mortgaging of the most significant assets of MIAS, including properties or facilities
- making of significant changes in MIAS's structure, including the capital structure or type of business
- significant changes to the operating budgets
- start of significant new activities, including activities within new classes of insurance
- significant changes to the organisation of MIAS, including significant reductions and increases in the number of employees
- entering into settlements in larger trial cases or arbitrations
- entering into or changes to reinsurance agreements
- activities or matters that fall outside the description of MIAS's description of procedures and operational plan
- activities which fall outside the guidelines and policies

The Board follows the "Rules of procedure for the Board" and "Board meeting plan (årshjul)".

#### **Risk Management Function**

MIAS requires that the risk management function must:

- assist the Board and other functions in the effective operation of the risk management system
- monitor the risk management system and the general risk profile of MIAS as a whole
- provide detailed reporting on risk exposures and advising the Board on risk management matters, including strategic affairs such as corporate strategy, mergers and acquisitions, major projects, and investments
- report to the Board at least on an annual basis
- identify and assess emerging risks
- ensure the effectiveness of the risk management system according to MIAS's risk appetite and overall risk tolerance limits, as well as manage the main risk management strategies and policies
- establish, implement and maintain a risk management system to be undertaken in the upcoming years when taking into account all activities and the complete system of governance of MIAS
- take a risk-based approach in deciding its priorities
- verify compliance with the decisions taken by the Board of the undertaking on the basis of the recommendations
- co-operate closely with the actuarial function
- provide self-assessment of the function and the processes and implement or monitor needed improvements

A part of the risk management functions duties is to manage MIAS risk register. All risks are governed by a risk owner who is asked to update the assessment of the risk on a frequent basis. The risk owners are also asked to identify new risks.

#### **ORSA**

The Risk management function must conduct MIAS's own risk and solvency assessment, ORSA. The ORSA is an integrated part of the business strategy and is taken into account in the strategic decisions of MIAS on an ongoing basis. The ORSA is formally approved by the management at least on an annual basis.

# **B.4** Internal Control system

Internal controls are carried out by staff responsible for performing operational tasks in MIAS (1<sup>st</sup> line of defence). Controls are designed to monitor significant risks to MIAS and ensure appropriate assurance that such risks are adequately managed.

Controls are documented and signed off by the person who has performed the control. An independent review of controls is performed by separate staff (4 eyes principle). The Compliance function with support from the Risk management function ( $2^{nd}$  line of defence) perform spot checks on selected controls on a quarterly basis to ensure that controls have been carried out as intended and have been documented.

The result of monthly controls is discussed with the Managing Director in monthly management meetings. Internal Audit is also informed of the result of the monthly controls. At every meeting in the Audit Committee, the result of the control activities are reviewed.

The overall assessment of the adequacy and effectiveness of the internal control system is performed by Internal Audit  $(3^{rd}$  line of defence).

It is ensured, that 2<sup>nd</sup> and 3<sup>rd</sup> line of defence is independent of daily operations.

#### The Compliance function

MIAS requires that the compliance function must:

- establish, implement and maintain appropriate activities to identify, assess, report on key legal and regulatory obligations
- ensure MIAS monitors and has appropriate policies and controls in respect of key areas of legal and regulatory obligation
- hold regular training on key legal and regulatory obligations
- address compliance shortcomings and violations
- report the compliance plan to the Board of MIAS, including ensuring that adequate disciplinary actions are taken and any necessary reporting to the supervisor or other authorities is made
- issue a compliance report to the MIAS Board based on the results of work carried out including findings and recommendations to the Board
- submit the compliance report to the Board at least on an annual basis
- verify compliance with the decisions taken by the Board on the basis of the recommendations
- conduct regular self-assessments of the compliance function and the compliance processes and implement or monitor needed improvements

# **B.5** Internal Audit Function

MIAS's Internal Audit function must:

• review the adequacy and effectiveness of the main governance process installed by other governance functions on a regular basis

- ensure a fair exchange of information with other governance functions
- discuss with other governance functions risk categorisation, opinion parameters, reporting tools, materiality metrics, etc. and thus enable all governance functions to speak to the Board using the same language
- use the output from other governance functions to build independent risk-oriented audit plans. Internal Audit must proactively work to enhance effective collaboration, clear responsibilities, and peer acceptance with other governance functions in addition to obtain Board approval of the above-mentioned topics

MIAS requires that the Internal Audit function must:

- establish, implement, and maintain an audit plan disclosing the audit work to be undertaken in the upcoming years when taking all activities and the complete system of governance into account
- take a risk-based approach in deciding its priorities
- report the audit plan to MIAS's Board of Directors of the undertaking
- issue an internal audit report to the Board of Directors based on the result of work carried out in accordance with point (a) including findings, recommendations, the appointed period of time to remedy the shortcomings as well as the persons responsible, and information on the achievement of audit recommendations
- submit the internal audit report to the Board of Directors of the undertaking at least on an annual basis
- verify compliance with the decisions taken by the Board of Directors of the undertaking on the basis of the recommendations
- provide self-assessment

# **B.6** Actuarial Function

The actuarial function contributes to the effective implementation of the risk management system, particularly with regard to the models that serve as a basis for the calculation of the solvency capital requirement and the minimum capital requirement, cf. Sections 126(c) and 126(d) of FIL, and the company's assessment of own risk and solvency. The actuarial function co-operates with the risk management function and contributes to solving that function's tasks whenever it is relevant. The actuarial function handles all the required technical tasks which fall on the function in accordance with the legislation in force from time to time. For completeness, the activities of the Actuarial Function are outlined in Article 48 of the Solvency II regulation as described below:

- 1. Insurance and reinsurance undertakings shall provide for an effective actuarial function to:
  - a) coordinate the calculation of technical provisions;
  - b) ensure the appropriateness of the methodologies and underlying models used as well as the assumptions made in the calculation of technical provisions;
  - c) asses the sufficiency and quality of the data used in the calculation of technical provisions;
  - d) compare best estimates against experience;
  - e) inform the administrative, management or supervisory body of the reliability and adequacy of the calculation of technical provisions;
  - f) oversee the calculation of technical provisions in the cases set out in Article 82;
  - g) express an opinion on the overall underwriting policy;
  - h) express an opinion on the adequacy of reinsurance arrangements; and
- 2. contribute to the effective implementation of the risk-management system referred to in Article 44, in particular with respect to the risk modelling underlying the calculation of the capital requirements set out in Chapter VI, Sections 4 and 5, and to the assessment referred to in Article 45. The actuarial function shall be carried out by persons who have knowledge of actuarial and financial mathematics, commensurate with the nature, scale and complexity of the risks inherent in the business of the insurance or reinsurance undertaking, and who are able to demonstrate their relevant experience with applicable professional and other standards.

## **B.7** Outsourcing

Outsourcing important areas of activity are decided by the Board of Directors.

There are regular reports to the Board of Directors to ensure compliance. The Board of Directors assess regularly whether activities are being carried out satisfactorily.

On establishment of the contract, MIAS assess whether the service provider possesses the ability and capacity to carry out the outsourced activities satisfactorily and, in this respect, has the licenses required by the relevant legislation for the specific outsourcing area.

MIAS regularly check that the service provider meets the obligations in the contract. The outsourcing undertaking must monitor whether, in carrying out the outsourced activities, the service provider is complying with the relevant regulations for the area.

If the service provider fails to meet the requirements of the contract and the relevant provisions for the specific outsourcing area, MIAS will take appropriate measures to ensure that the service provider meets these and, if necessary, MIAS itself or through contracting with a new service provider ensures that the requirements of the contract and the relevant provisions for the specific outsourcing area are met within an appropriate time limit given the circumstances.

MIAS ensures adequate insight to ensure that the service provider and the service meet the requirements of the contract and the relevant provisions for the specific outsourcing area.

MIAS has to a large extent outsourced the operation, including Risk Management, Compliance, Actuarial, Underwriting, Reinsurance, Claims handling, Legal, Tax, Accounting, Investment, Reporting, IT, etc.

Underwriting, Reinsurance, Legal, Tax, Accounting, Investment, Reporting and IT are outsourced to the parent company. The Risk Management, Actuarial, Claims handling and Compliance functions are outsourced to external parties.

# **B.8** Any other information

#### Remuneration/Salary

The Chairman of the Board of MIAS submits the remuneration policy for the general assembly at the annual general meeting with regard to management's wages.

The Board carries out ongoing monitoring and verification of the wage policy and performs review of the policy at least once yearly.

MIAS has fixed salary and no pension scheme.

# C. Risk Profile

MIAS's Board of Directors has identified and evaluated a register of risks. As an addition to the risks described below the top 10 risks and the corresponding mitigation actions are described in Appendix 1.

# C.1 Insurance Risks

The risks MIAS insures are analysed and approved by the Board in accordance with the company's concession, strategy, risk appetite, and procedure manual. MIAS estimates the desired and acceptable level of risk, overall and for each subcategory. This assessment is made with respect to the company's capital, and MIAS may choose to take part in the risk under the lead of an external insurance company. MIAS engages in net risk retention throughout and retains up to USD 600 million (gross). Risk appetite and other metrics for maximum exposure are expressed in net terms.

MIAS writes property and casualty risks mainly within the areas Marine, Logistics and Terminals. The company participates in insurance programmes that are in line with the company's risk appetite, subject to approval by the Board of Directors. The risks the parent company wishes to insure through the company are assessed in terms of the expected premium to the expected damage so only financially feasible risks are insured.

Geographically, the company can take risks worldwide, wherever there is no requirement for local insurance and where the A.P. Moller - Maersk Group's insurable interests are represented. MIAS uses an external insurance company for most risks and local fronting companies where local subscription is required.

#### Risk appetite

MIAS's risk appetite is constituted by the maximum possible net exposures undertaken (net of reinsurance cover) and is defined by the Board of Directors as listed below:

Description	Risk Appetite 2022
Hull & Machinery, War	USD 25m per occurence
Property (Terminal, Warehouses)	USD 25m per occurence
Liability (Offices)	USD 25m per occurence
Property (Offices)	USD 25m per occurence
Liability (Umbrella)	USD 25m per occurence
Financial Lines (EPL, PTL, DnO)	USD 25m per occurence
Liability (Terminal, Warehouses)	USD 25m per occurence
Cyber	USD 25m per occurence
Cargo	USD 25m per occurence
Employee Benefit Insurance	USD 25m per occurence
Property & Liability (Containers)	USD 25m per occurence

## Net risk retention

MIAS's current exposure is comprised of the difference between gross retention and the reinsurance or retrocession protection procured and equals the net retention. Thus, the gross retention is mitigated by the use of reinsurance or retrocession. The current exposure is expected to be equal to, or less than, the risk appetite. MIAS's net retention (net of reinsurance cover) is for the policy period 2022 and 2023.

Description	2022 exposure	2023 exposure
Marine (H&M, War)	USD 18.75 million per occurrence	USD 18.75 million per occurrence
Terminal (PD, BI)	USD 25 million per occurrence	USD 25 million per occurrence
Global Property (PD)	USD 25 million per occurrence	USD 25 million per occurrence
Global Casualty (TPL)	USD 25 million per occurrence	USD 25 million per occurrence

Terminal Operators Liability	USD 25 million per occurrence	USD 25 million per occurrence
Freight Services Liability	USD 25 million per occurrence	USD 25 million per occurrence
Maersk Value Protect	USD 5 million per occurrence	USD 5 million per occurrence
Container Handling Equipment	USD 5 million per occurrence	USD 5 million per occurrence
Umbrella Liability	USD 25 million per occurrence	USD 25 million per occurrence
Employment Practices Liability	USD 10 million per occurrence	USD 5 million per occurrence
Pension Trustee Liability	USD 10 million per occurrence	USD 10 million per occurrence
Special Risk	USD 5 million per occurrence	USD 10 million per occurrence
Cyber Insurance	USD 10 million per occurrence	USD 7,5 million per occurrence
People lines	USD 5 million per occurrence	USD 5 million per occurrence

Running alongside the exposures for 2022 is a structured excess of loss reinsurance program with a limit of USD 40 million which is triggered if the net loss to MIAS exceeds USD 110 million in the annual aggregate.

The reinsurance programme includes a Treaty reinsurance layer of USD 75 million xs USD 25 million per multi-class event. Facultative reinsurance is placed on Liability, Property and Marine that provide cover excess of USD 100 million.

# C.2 Market Risks

MIAS is exposed to a selected range of market, counterparty, and credit risks which are summarised in the table below. All risks that MIAS is exposed to are approved by the Board of Directors.

Description	Limit	Actual exposure
Interest rate risk	5 % of total assets on a 100 bp change in the interest rate	Limits are met
Products not allowed for trading	Geared investments, options or other exotic products, premium bonds, mutual funds or other types of pooled investments	Limits are met
Currencies allowed for trading	USD, DKK, EUR, SEK, NOK, CHF, GBP, JPY, AUD and CAD If not USD, the currency risk must be hedged	Limits are met
Other investments	5 % of total assets for corporate bonds, stocks and capital shares	Limits are met

# C.3 Credit Risks

MIAS is exposed to a selected range of market, counterparty, and credit risks which are listed in the table below. All risks that MIAS is exposed to are approved by the Board of Directors.

Description	Limit	Actual exposure
Counterparty rating requirements	<ul> <li>Government bonds and mortgage bonds minimum rating of S&amp;P AA or equivalent. Exceptions are Danish or US government bonds</li> <li>All other investments have a minimum counterparty rating requirement of S&amp;P A- or equivalent</li> <li>No rating requirement for the parent company A. P. Moller - Maersk A/S</li> <li>Reinsurers must have a minimum rating S&amp;P A- or similar</li> </ul>	There is one reinsurer, Fidelis, with a total capacity of USD 80m and a S&P rating of A MIAS´ guidelines state that exposures against a reinsurance company of USD 50m to USD 100m requires a rating of minimum A+, and the policy is therefore

Description	Limit	Actual exposure
		currently not adhered to. This exemption has however been approved by MIAS' board both for 2022 and 2023.
Asset types allowed for trading*	<ul> <li>Loans to parent company A. P. Moller - Maersk A/S</li> <li>Cash at banks</li> <li>Bonds or debt instruments issued or guaranteed by governments or regional authorities in Zone A</li> <li>Bonds traded on regulated markets in countries within the European Union or in the US</li> <li>Danish mortgage bonds, mortgage covered bonds and covered bonds issued by mortgage banks, financial institutions or ship financing institutions</li> <li>Corporate bonds listed on a stock exchange in EU / EEA countries</li> <li>Stocks and capital shares listed on a stock exchange in EU / EEA countries</li> </ul>	Limits are met
Concentration risk** maximum per single counterparty	<ul> <li>15 % of total assets in a single financial institution, except for Danske Bank with 30% of total assets.</li> <li>Total exposure to a financial counterparty, which operates both banking and mortgage business is limited at 30 % of total assets, of which 15 % to the bank and 15 % to the mortgage business</li> <li>No limit for Danish or US government issued bonds</li> <li>Investments directly in A.P. Møller – Mærsk A/S is not included in above mentioned requirements, as long as Danish FSA approves.</li> </ul>	Limits are met
Cumulative exposure	<ul> <li>Cash at banks limited to 60 % of total assets</li> <li>Corporate bonds, stocks and equity accumulated limited 15 % of total assets and each asset type is limited to 10 % of total assets</li> </ul>	Limits are met

\* Exposure defined as loans, deposits, bonds and shares, and market-to-market of derivatives.

\*\*Concentration risk for the company's risks from excessive reliance on a particular asset class, investment market or a particular investment.

MIAS' reinsurers are selected in accordance with the following criteria:

- Minimum rating S&P A- or similar
- Minimum rating S&P A+ or similar if the exposure is above USD 50 million
- Minimum rating S&P AA or similar if the exposure is above USD 100 million
- Good level of capital surplus which also takes into account the potential gross exposures and ratings
- MIAS has a large number of high-quality reinsurers and therefore benefits from diversification

The minimum rating requirements imply a low probability of default. There is a risk of systemic default in which the entire insurance market is affected. However, this is a risk that would be difficult to mitigate other than via applying minimum ratings to insurers and reviewing the panel of reinsurers on a regular basis.

# C.4 Liquidity Risks

Due to the nature of the business model, the liabilities in MIAS are short termed as they are mainly consisting of claims which are one-time payments. To match the duration of the liabilities, the assets are short termed as well. The loan to the parent company can be withdrawn with 48 hours' notice, and all deposits are of few months' duration. This ensures a balanced liquidity in MIAS where claims can be paid on time even with short notice.

# C.5 Operational Risks

The Board has assessed that the following types of events are a part of operational risks:

- losses due to administration errors to the extent they are not covered by the administrator (the supplier in the outsourcing agreement)
- costs resulting from fraud
- costs due to key staff severance
- losses due to the termination of the outsourcing agreement by the system administrator
- losses due to IT downtime, fire damage, etc.

The list is not exhaustive.

The policy for operational risk states that administrative tasks are outsourced to the parent company, which according to the outsourcing agreement is assumed to run administration and IT at a comfortable level.

Economic losses caused by reasons other than insurance events and developments in the financial market are continuously recorded based on booked loss values.

To ensure that management is aware of operational risks in MIAS, they review a quarterly written report containing the following:

- losses in excess of DKK 250.000 (must be recorded and reported)
- events that could have led to a loss of DKK 250.000 (must be recorded and reported)
- assessment of the company's current operational risks and the likelihood that a given event occurs
- description of the risk minimisation measures undertaken to avoid/minimise the recurrence of loss/risk of loss
- other relevant information

A specific operational risk assessment can be found in appendix 1.

## C.6 Other material risks

There are no other material risks not covered above.

## C.7 Any other information

#### Fronting

MIAS operates through fronting companies in order to reduce the operational tasks to a desired minimum and to benefit from the operational efficiencies of large global insurance carriers.

The fronting activities consist predominately of policy administration and to some extent underwriting and claims handling.

#### Outsourcing

MIAS has to a large extent outsourced the operation, including underwriting, reinsurance, claims handling, actuarial services, legal, tax, accounting, investment, reporting, IT, risk management functions, etc.

Underwriting, reinsurance, claims handling, legal, risk management, tax, accounting, investment, reporting, IT are outsourced to the parent company. The parent company has sub-outsourced certain claims handling activities to an external party.

The actuarial function, compliance and risk function are outsourced to external parties.

# D. Valuation for solvency purpose

## **D.1** Assets

The table below sets out MIAS's assets under statutory accounting and Solvency II bases as of 31 December 2022. The total assets increase from statutory accounting (USD 478.317 thousand) to Solvency II (USD 481.012 thousand) which reflects the balance sheet treatment under Solvency II.

The area of difference between the two valuations is in the valuation of the receivables, deferred tax assets, short term deposits, Reinsurers' premium provisions and insurance debtors, as detailed in the table below.

	Statutory Accounting	Solvency II
Receivables	8.199	9.170
Deferred tax assets	-	2.810
Liquid Funds	9.962	9.962
Short term deposits	228.000	228.819
Loan to APMM	181.904	181.904
Reinsurers' Share of Technical Provisions	31.419	31.306
Claims Provision	30.258	30.258
Premium Provision	1.161	1.047
Insurance debtors	18.833	17.042
Total assets	478.317	481.012

All values are in USD thousands

#### **Reinsurers' Share of Technical Provisions**

The Reinsurers' share of premium provisions reduce from accounting treatment (USD 1.161 thousand) to Solvency II (USD 1.047 thousand) due to discounting. The discounting effect amounts to USD 113 thousand.

The Reinsurers' share of claims provisions are discounted under statutory accounting in accordance with Solvency II.

#### Receivables, short term deposits and insurance debtors

The short-term deposits include accrued interest under Solvency II which is included in the Receivables under statutory accounting. The accrued interest on the short-term deposits amounts to USD 819 thousand.

The difference in insurance debtors between statutory accounting and Solvency II is due to accrued income for commission which is included under Receivables in Solvency II.

#### All other assets

All other assets have been retained as accounting values given their short-term and liquid nature.

# **D.2** Technical provisions of insurance and reinsurance

Solvency II Class	Marine, Aviation & Transport	Fire & Other Damage to Property	General Liability Insurance	Miscellaneous Financial Loss	Medical expence	Income protection	Life	Total
Claims provision	74.862	22.480	27.420	857	8.426	6.794	1.268	142.106
Outstanding claims	82.984	25.049	30.012	938	9.340	7.531	1.406	157.260
Discount effect	-8.122	-2.569	-2.592	-81	-914	-737	-138	-15.154
Premium Provision	0	214	0	206	3.955	45	384	4.805
UPR	0	239	0	226	4.384	50	426	5.325
Discount effect	0	-25	0	-20	-429	-5	-42	-520

The table below sets out the technical provisions (gross of reinsurance) by Solvency II line of business.

All values are in USD thousands

The technical provisions under Solvency II are valued at Best estimate, meaning they are adjusted for the time value of money and run-off patterns using a discounted cash flow valuation and the interest rates provided by EIOPA.

In line with Danish regulations the future profits are not considered in the calculation of the premium provisions under Solvency II.

#### Risk Margin

The risk margin is a function of the SCR and is calculated to be USD 11.736 thousand.

Whilst liabilities under Solvency II are measured at best estimate, these are inherently uncertain, and the risk margin provides a margin to ensure liabilities are valued at fair value. It can also be described as the amount that an undertaking would require above the best estimate liabilities in order to take over and meet the obligations.

This is calculated by determining the cost of providing an amount of capital equal to the SCR necessary to support the obligations over their lifetime.

The calculation involves approximating the SCR for each future year (based on the assumed settlement of claims) and then valuing the risk margin on a discounted cash-flow basis.

A 6 % Cost of Capital rate is assumed to determine the cost of providing the funds as defined in Solvency II.

#### Areas of uncertainty within the Technical Provisions

Settlement period: The risks being underwritten are mainly short-tailed. Most claims except some general liability claims are settled after 5 years.

Discount rate: Current yields are very low, which means that almost no discounting is applied to the Technical Provisions given the risks underwritten by MIAS are short-tailed.

Claims provision: MIAS's classes of risk are low frequency, high severity and as such MIAS does not have a high volume of claims. MIAS's approach of applying loadings to known claim reserves to allow for adverse development is in line with industry practice. Historically, MIAS has not seen much adverse development so known case reserves are expected to be broadly reasonable. However, there is inherent uncertainty in the claim provisions.

Premium provision: As agreed with the DFSA, MIAS's Solvency II premium provision assumes a 100 % loss ratio, i.e. no advance credit is taken for expected underwriting profits. This is prudent given MIAS's historical experience.

#### Additional adjustments

MIAS has made no adjustments for matching adjustments, volatility adjustments, transitional measures or transitional deductions within its technical provisions.

#### Material changes in assumptions

MIAS has followed the same approach to the calculation of technical provisions since 2012 and as such there are no material changes to report.

# **D.3** Other liabilities

The table below sets out MIAS's liabilities under Statutory Accounting and Solvency II as of 31 December 2022.

	Statutory Accounting	Solvency II
Gross technical provisions	159.167	158.648
Claims Provision	142.106	142.106
Premium provision	5.325	4.805
Risk margin	11.736	11.736
Payables	1.476	1.473
Tax payables	14.110	12.294
Reinsurance payables	26.042	26.042
Total liabilities	200.795	198.457

All values are in USD thousands

#### **Technical provisions**

The gross premium provisions decrease from the accounting treatment (USD 5.325 thousand) to Solvency II (USD 4.805 thousand) due to discounting. The discounting effect on the premium provisions amount to USD 520 thousand.

The gross claims provisions are discounted under statutory accounting in accordance with Solvency II.

MIAS includes the risk margin of USD 11.736 thousand calculated in accordance with Solvency II in their statutory accounting.

#### Tax payables

The difference is related to non-taxable income and non tax-deductable claims which is only considered in the annual accounts while the SCR is based on the quarterly management accounts.

#### All other liabilities

All other liabilities have been retained as accounting values given their short-term and liquid nature

#### **D.4** Alternative valuation method

The solvency and financial condition report must include information on the areas set out in Article 263 in complying with the disclosure requirements of the insurance or reinsurance undertaking as laid down in paragraphs 1 and 3 of this Article.

## **D.5** Other information

No other material information regarding the valuation of assets and liabilities for solvency purposes is deemed necessary.

# E. Capital Management

# E.1 Own funds

The management of own funds is governed by the Policy for Capital Structure where the overall responsibility and tasks are defined. According to this policy, the equity of the company must be sufficient to ensure the continued operation of the company and at the same time sufficient to meet all regulatory requirements. The company is constantly focusing on matters which might influence the capital structure, e.g. the company's investment policy. The value creation of the company is meant to primarily be generated from acceptance of insurance risk rather than by acceptance of investment risk. The time horizon for business planning including development of own funds is minimum 3 years.

Own funds as at the reporting date consists of:

Own funds	31.12.2022	31.12.2021	Development
Ordinary share capital	89.987	89.987	-
Reconciliation reserve	189.759	135.081	54.679
Own funds (Tier 1)	279.746	225.067	54.679
Own funds (Tier 3)	2.810	2.311	499
Total own funds	282.556	227.378	55.177

All values are in USD thousands

Total own funds as shown above are eligible for meeting the SCR and the total own funds excluding the tier 3 capital are eligible for meeting the MCR.

As of 31 December 2022, the equity according to statutory accounts is USD 277.522 thousand.

The difference between the statutory equity and the own funds under Solvency II is primarily caused by the following:

- Inclusion of deferred tax assets on the Solvency II balance sheet: USD 2.810 thousand
- Discounting of the reinsurers' share of premium provisions: USD 114 thousand
- Discounting of the gross premium provisions: USD 520 thousand
- Difference in tax payables between Solvency II and statutory accounting: USD 1.816 thousand

# E.2 Solvency capital requirement and Minimum Capital Requirement

The Solvency Capital Requirement (SCR) is calculated using the standard formula without simplified calculations and without undertaking specific parameters.

The following tables shows the SCR by risk module, the Capital Available and the resulting Solvency ratio.

	31.12.2022	31.12.2021
Market risk	6.986	1.002
Counterparty Default risk	35.267	30.668
Non-Life Underwriting risk	78.816	71.328
Health Underwriting Risk	27.194	22.915
Life Underwriting Risk	5.613	5.462
Diversification effects	-43.317	-34.760
Basic SCR	110.558	96.617
	0	
Operational risk	6.479	7.138
LACDT adjustment	-28.019	-21.685
SCR	89.019	82.070
Capital available	282.556	227.378
Solvency ratio	317%	277%

All monetary values are in USD thousands

All risks except operational risk have increased from 2021 to 2022, where Life Underwriting Risk is the only one without major changes. The most significant movements from 2021 to 2022 are:

- Market Risk increased primarily due to increasing interest rates
- Counterparty Default Risk, Non-Life Underwriting Risk and Health Underwriting Risk increased due to increase in exposure
- The LACDT adjustment increased due to the change of tax rate from 22% to 25,2% as of 1 January 2023.

The Minimum Capital Requirement (MCR) is calculated using the standard formula without simplified calculations and without undertaking specific parameters

The following table shows the input used to calculate the MCR. The MCR as per 31 December 2022 amounts to USD 26.242 thousand. This corresponds to the sum of Life MCR and Non-Life MCR.

	31.12.2022	31.12.2021
Life MCR (based on Premiums)	35	25
Non-Life MCR (based on Premiums and Technical Provisions)	26.207	17.025
MCR Floor (25% of SCR)	22.255	20.518
MCR Cap (45% of SCR)	40.058	36.932
Absolute Minimum (EUR 3.7m)	3.946	4.191
Minimum Capital Requirement	26.242	20.518

All values in USD thousands

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

The company has not invested in shares and this section is therefore not relevant.

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

The company does not make use of an internal model.

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

The Board of MIAS has decided that the solvency ratio of the company as a minimum target should be 1,50. This target is considered whenever new business opportunities are evaluated and when considering the future strategy of the company.

The actual solvency ratio is calculated by the company's actuarial function on a quarterly basis and additionally in connection with assessing new significant risks. The future estimated solvency ratio is included in the company's budgets which are updated yearly and covers at least a three-year period.

If a recalculation or reassessment of the company's individual solvency requirement shows that the Company's capital plan has changed to the effect that the capital base is less than 1,30 times the capital base (individual solvency requirement) of the Company, Management must inform the Board of Directors immediately. Management must, in coordination with the Chairman of the Board, convene a meeting of the entire Board of Directors as soon as possible and within one week. At this meeting, Management must:

- 1.1. Identify the material reasons for the increased capital requirement based on the model for determination of the individual solvency requirement, and/or the main reasons for the reduction in the capital base.
- 1.2. Provide a basis for the Board's assessment of the projected impact of the reduction, its timing and the requisite response time for actions aimed at restoring the Company's capital position to include the excess coverage of 1,5 as intended by Board of Directors.

Serving as basis of decision for the Board of Directors at the meeting, Management has prepared:

- 1.1. A statement of the individual solvency requirement
- 1.2. Proposals for measures that may restore excess coverage to the intended level. Proposals for changes to the writing of insurances or the structure of contracts with suppliers must be supplemented with reflections about the impact of limiting the writing of new or extending insurance policies. Furthermore, (additional) reinsurance for the entire or part of the insurance portfolio must be considered. And changes to the Company's investment policy may be included to the extent these may increase excess coverage.
- 1.3. Analysis of scope for restoring capital position by raising further capital in the form of share capital or other subordinate capital.

Based on such proposal, the Board of Directors will decide on action to be taken to quickly reduce the capital need or raise any requisite additional capital. If the Board of Directors deems that the proposals are not sufficient or that alternatives exist, such additional measures will be implemented.

If Management finds that the excess coverage is critically low at 1,25 or below relative to the capital base (individual solvency requirement), Management must immediately inform the Board of Directors and, in coordination with the Chairman of the Board, convene a meeting of the entire Board of Directors as soon as possible. The purpose of the said meeting is to quickly restore the capital position. The Board of Directors will notify the Danish Financial Supervisory Authority about the situation.

Management is under a separate duty to oversee that the Company's excess coverage does not drop below 1,1 in the process. If this is the case, Management must immediately inform the Board of Directors and auditors thereof.

If the Board establishes, in connection or continuation of this event, that the previous efforts do not have the expected effect quickly enough, Management must completely suspend the writing and renewal of insurance policies. Such

resolution is to be made by the Board of Directors based on the Board's consideration of the options for rapid capital increases.

The Board of Directors must make such resolution not later than four weeks after the Board meeting at which the capital plan will be adopted.

Solvency Ratio	Action
1,50	The targeted minimum ratio – no action required
1,30	The Board is summoned to decide if the solvency ratio needs to be strengthened immediately
1,25	The Board is summoned and will meet without delay and will based on presentations from Management decide any actions which must be initiated to improve the solvency situation immediately. The Board will notify the Danish Financial Supervisory Authority about the situation
1,10	Renewed notification of the Board, notification to external auditors and suspension of writing any new insurance policies

The MIAS Board of Directors has established the following capital emergency plan:

# E.6 Any other information

There is no other information in relation to capital management which is relevant to disclose.

# F. Appendix

# F.1 2022 Q4 Top 10 risks

Risk type	Description	Probability & Impact	Triggers	Vulnerabilities	Consequence	Exisiting mitigation
Underwriting	Fair representation of the risk: In case retrocession insurers are not given a fair representation of the risk it may lead to retrocession insurers declining cover on the basis that the risk was different or greater than what they had assessed	1-5 % 30-50 mUSD	• MIAS underwriting team not providing the correct and important information about the risks to be reinsured	<ul> <li>Change in retrocession structure leading to change in required risk information</li> <li>MIAS underwriting team not fully understanding the business risks</li> <li>MIAS reinsuring the gross risk</li> <li>UK Insurance Act implications on not adhering to the information obligations on the insured</li> </ul>	Negative financial result for MIAS     Revised SCR calculation adversely affects solvency margin targets (140%-110%) potentially leading to additional capital funding requirements	<ul> <li>MIAS underwriting team close interaction with the risk advisors and the business</li> <li>Retrocession broker advising on need for disclosure of important information</li> <li>Process for representation of risk at renewal (consistent format for underwriting submission designed)</li> <li>SOP around the process for handling of changes in exposure throughout the year</li> </ul>
Underwriting	Back-to-back retrocession: Back-to- back Cover provided under the fronted policies issued to Maersk entities and reinsured to MIAS, but not ceded to MIAS retrocession insurers	1-5 % 30-50 mUSD	• Retrocession program not back to back with cover provided under reinsured polices (by MIAS)	<ul> <li>Change in retrocession structure implying a new type of reinsurance wording</li> <li>MIAS reinsuring the gross risk</li> <li>Local policies issued not mirroring the Master policy</li> </ul>	<ul> <li>Retrocession cover not responding leading to MIAS exposed to pay claims in excess of their retained risk</li> <li>Negative financial results of MIAS</li> <li>Revised SCR calculation adversely affects solvency margin targets potentially leading to additional capital funding requirements in the long term</li> </ul>	<ul> <li>Legal back-to-back review of master polices, reinsurance agreements and retrocession slips (SOP on back to back review)</li> <li>Retrocession policies issued as follow form</li> <li>Review of local policies for consistency, master policies (FINC Clause, DIC/DIL, Insureds Clauses, limits, coverage) (SOP on local policy issuance)</li> <li>Through review of fronting policies ensure tie-in (interlocking) limits are included when multiple policies issued under same master policy</li> </ul>

Claims	Failure to recover from retrocession insurance: Failure to obtain proper recovery from retrocession insurers due to late reporting or inadequate reporting to retrocession or completely miss to report	5-25% 10-30 mUSD	<ul> <li>Failure to report to Retro,</li> <li>Late reporting to the Retro</li> <li>Lack of understanding of the retro insurance in place due to insufficient documentation in the system,</li> <li>Reinsurer refuses to pay</li> </ul>	<ul> <li>Lack of (clear) ownership</li> <li>Lack of necessary resources</li> <li>Lack of IT capabilities</li> <li>Incomplete processes</li> </ul>	<ul> <li>Negative financial result for MIAS</li> <li>Solvency issues and additional capital funding requirements</li> <li>Reputational damage to MIAS and the wider APMM Group</li> </ul>	<ul> <li>Finance competence and monthly control with assistance of finance</li> <li>Clear and timely processes and documentation (Archer)</li> <li>Have regular contact with brokers</li> <li>Training of colleagues</li> </ul>
Underwriting	Catastrophe losses: An event which impacts MIAS on several lines of insurance, potentially multiple times on same line of insurance or incident that triggers multiple losses across a concentrated and positively correlated leading to losses beyond the risk appetite	5-25% 10-30 mUSD	Catastrophic risk due to terror, war, pandemic, or natural catastrophe etc. Systemic risks triggering multiple sideways losses across positively correlated policies with highly concentrated exposures Lack of reinsurance Inadequate or insufficient reinsurance response Unexpected high number of individual occurrences across risk accepted	<ul> <li>Failure to understand the potential catastrophe exposures that MIAS is exposed to</li> <li>Failure to recognize and manage the potential financial impact of catastrophe losses</li> <li>Failure to understand exposure to sideways (aggregate) losses</li> <li>High level of retentions on individual risks (line of business)</li> <li>High level of retentions on individual risks (line of business)</li> <li>High level of concentration and positive correlated risk with limited diversification effect</li> <li>Concentration risk increasing with inclusion of new lines of insurance such as container handling equipment, medical and life insurance for employees and eventually cargo insurance</li> <li>Complex and insufficiently calibrated reinsurance structure leaves holes in protection against sideways losses</li> <li>Incomplete understanding of how reinsurance</li> <li>Current reinsurance structure biased towards facultative reinsurance</li> </ul>	Negative financial result for MIAS     Revised SCR calculation adversely affects solvency margin targets (140%-110%) potentially leading to additional capital funding requirements	<ul> <li>Stop loss insurance in place</li> <li>Risk treated in-depth in ORSA-process</li> <li>Separate "Black Swan"-analysis (stress test of major loss scenarios) completed in 2021</li> <li>Quarterly risk management reports including large losses and reinsurance</li> <li>Reinsurance purchased such that retained exposure remains within risk appetite</li> <li>Recurring review of solvency/capital and reinsurance structure</li> <li>Performance and financial stability is evaluated and reported monthly</li> <li>Risk exposures are discussed at board meetings whenever there are proposed/new exposures</li> <li>Mix of risks accepted is approved by the board and subsequently adhered to and controlled (ORSA)</li> <li>Implementation of new operating model to recreate diversification in MIAS risk profile and improve possibility for recovery of losses from business</li> <li>Lowering attachment point of Stop Loss/Umbrella insurance procurrence and in the yearly aggregate</li> <li>Actuarial function and risk management function assessing adequacy of underwriting policy, reserves and reinsurance procurrence and in the yearly aggregate</li> <li>Actuarial function and risk management function assessing adequacy of underwriting policy, reserves and reinsurance procurrence and in the yearly aggregate</li> <li>Actuarial function and risk management function assessing adequacy of underwriting policy, reserves and reinsurance protection against sideways losses</li> </ul>

	Reinsurance default	5-25%	• Reinsurer	• Failure to establish and	Unacceptable	Reinsurance Policy
Underwriting		10-30 mUSD	defaulting or has a significant change of credit rating	maintain reinsurance in accordance with the risk appetite and solvency requirement • Failure to comply with MIAS' reinsurance policy, including counter-party rating changes	counter-party exposures are allowed to develop • Revised SCR calculation adversely affects solvency margin targets leading to additional capital funding requirements • Delayed payment or non-payment of claims	approved by the board • MIAS Reinsurance Policy is reviewed at least once a year • Overview of all reinsurers is kept in MIAS and credit ratings of all reinsurers are checked on a bi-weekly basis • If a rating of a reinsurer is below the rating set in the MIAS Reinsurance policy, the board is informed and asked for approval to continue if that is considered the best solution by MIAS Mgt, if not the reinsurer is sought replaced with the broker
Underwriting	Legacy risk on Energy Business (run-off): Claims under legacy Energy policies in place for the period 2012 to 2016 (for which no IBNR or IBNER reserves are provided) are notified to MIAS by divested Energy companies	5-25% 10-30 mUSD	Claims related to years when MIAS were on risk for Energy Business surfacing late	<ul> <li>No possibility to price in additional premium in the future for this type of risks</li> <li>Lack of transparency in claims handling</li> <li>Misalignment in interests</li> </ul>	<ul> <li>Additional claims costs</li> <li>Loss to APMM</li> </ul>	• Energy run-off cover taken out with effect from 27 April 2021 protecting MIAS exposure on previous energy related covers for losses arising after the inception date. The policy expires 1 May 2028. • Monitor exposures and active claims management if claims should occur
Finance	Parent company bankrupt A prolonged downturn in the market or inability to deliver a superior/consistent service level to APMM's customers could lead to bankruptcy of APMM	< 1% > 50 mUSD	• Failure to operate APMM profitably eroding equity	<ul> <li>Financial loss to MIAS</li> <li>MIAS' sole purpose is to operate as a risk retention vehicle to APMM wherefore all business would be lost</li> <li>MIAS is taking larger risks than it would on a standalone basis as the risk appetite is partly defined by APMM</li> <li>The MIAS capital emergency plan is partly dependent on APMM</li> </ul>	<ul> <li>Default on MIAS' loan to parent</li> <li>MIAS put in run-off</li> </ul>	Rating of parent company Proximity to Group Finance facilitates a close dialogue
Finance	Bank bankrupt MIAS is placing substantial amounts of deposits with a number of banks. According to the investment policy, deposits with one bank can maximum be 15% of total financial assets except for Danske Bank where limit is 30%.	< 1% > 50 mUSD	Systemic loss causing the default of MIAS main deposit bank	• Financial loss to MIAS of up to 30% of total financial assets.	<ul> <li>Loss of MIAS deposits</li> <li>Negative financial result for MIAS</li> <li>Solvency issues</li> <li>Requirement for additional capital</li> </ul>	<ul> <li>List of allowed counterparts is maintained</li> <li>Investment policy restricts how large a share of total financial assets which can be placed in deposits</li> <li>Investment policy limits how large a share of total financial assets can be placed with a bank</li> <li>Investment policy specifies rating requirement of banks</li> <li>Monitoring of adherence to limits in investment policy</li> </ul>

Finance/Management	Increased volatility from new reinsurance structure Retentions for main programs have increased to USD 25m per event which will lead to increased volatitily in financial results	1-5 % 10-30 mUSD	• Several medium or large claims events within a policy year	<ul> <li>Lack of portfolio diversification (especially MVP and EBI)</li> <li>High threshold for aggregate stop loss protection</li> <li>Increased retentions at the bottom of the program</li> <li>Claims will exceed premium income and exhaust the Aggregate Excess of Loss policy which will lead to financial loss in MIAS. The Aggregate Excess of Loss policy has a deductible of USD 115m which equals the MIAS 2022 net premium and has a limit of USD 40m. The limit is forecasted to be exhausted in 1 in 50 years.</li> </ul>	Negative result in MIAS     Lower SCR ratio     Higher future premium to business	<ul> <li>Currently high SCR ratio</li> <li>Carry forward mechanism allowing MIAS to increase future premiums in case of large losses</li> <li>Treaty structure will cap maximum loss per event across all lines of business (except Cyber)</li> <li>Aggregate Excess of loss policy, USD 40m xs USD 115m</li> <li>Portfolio diversification</li> <li>Cost neutral underwriting over five years</li> <li>Reinsurance and stop loss</li> </ul>
Management	Inaccurate handling of data: Poor data management leads to poor and incomplete basis for risk profiling and decisions regarding risk acceptance and claims payments	25-75% 5-10 mUSD	Inadequate processes for data management Inadequate processes for underwriting and claims handling Lack of process discipline (i.e. Consistent performance of processes) Lack of system availability or system failure	<ul> <li>Poor processes for data management</li> <li>Incomplete processes for underwriting and claims handling</li> <li>Incomplete organization and unclear accountabilities iro data management</li> <li>Transactional organization</li> <li>Complex and widely scattered business organization to collect data from</li> </ul>	<ul> <li>Incorrect risk profiling due to poor and incomplete data</li> <li>Poor decision- making due to lack of data (risk acceptance and claims)</li> <li>Operational inefficiencies arising from need to collate and reconcile data</li> </ul>	<ul> <li>Data management officer in place (Selina)</li> <li>Risk Management Information System (RMIS) in place</li> <li>SOPs for underwriting and claims handling in place</li> <li>Organization built in the business to support the processes with clear accountabilities assigned</li> <li>RMIS tailored and adapted to processes created</li> </ul>

# F.2 QRTs

All amounts in USD thousands

# S.02.01 - #1

Assets		Solvency II value
		C0010
Goodwill	R0010	
Deferred acquisition costs	R0020	-
Intangible assets	R0030	C
Deferred tax assets	R0040	2.810
Pension benefit surplus	R0050	C
Property, plant & equipement held for own use	R0060	C
Investments (other than assets held for index-linked and unit-linked funds)	R0070	228.819
Property (other than for own use)	R0080	C
Participations	R0090	C
Equities	R0100	C
Equities - listed	R0110	C
Equities - unlisted	R0120	C
Bonds	R0130	C
Government Bonds	R0140	0
Corporate Bonds	R0150	0
Structured notes	R0160	0
Collateralised securities	R0170	0
Investment funds	R0180	0
Derivatives	R0190	0
Deposits other than cash equivalents	R0200	228.819
Other investments	R0210	0
Assets held for index-linked and unit-linked funds	R0220	0
Loans & mortgages	R0230	181.904
Loans on policies	R0240	0
Loans & mortgages to individuals	R0250	C
Other loans & mortgages	R0260	181.904
Reinsurance recoverables from:	R0270	31.306
Non-life and health similar to non-life	R0280	31.306
Non-life excluding health	R0290	31.306
Health similar to non-life	R0300	0
Life and health similar to life, excluding health and indexlinked	R0310	0
Health similar to life	R0320	0
Life excluding health and index-linked and unit-linked	R0330	0
Life index-linked and unit-linked	R0340	0
Deposits to cedants	R0350	0
Insurance & intermediaries receivables	R0360	17.042
Reinsurance receivables	R0370	0
Receivables (trade, not insurance)	R0380	0
Own shares	R0390	0
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	C
Cash and cash equivalents	R0410	9.962
Any other assets, not elsewhere shown	R0420	9.170
Total assets	R0500	481.012

# S.02.01 - #2

Liabilities		Solvency II value
Technical provisions – non-life	R0510	156.405
Technical provisions – non-life (excluding health)	R0520	134.326
TP calculated as a whole	R0530	0
Best Estimate	R0540	126.039
Risk margin	R0550	8.287
Technical provisions - health (similar to non-life)	R0560	22.079
TP calculated as a whole	R0570	0
Best Estimate	R0580	19.220
Risk margin	R0590	2.859
Technical provisions - life (excluding index-linked and unitlinked)	R0600	2.243
Technical provisions - health (similar to life)	R0610	0
TP calculated as a whole	R0620	0
Best Estimate	R0630	0
Risk margin	R0640	0
Technical provisions - life (excluding health and index-linked and unit-linked)	R0650	2.243
TP calculated as a whole	R0660	0
Best Estimate	R0670	1.653
Risk margin	R0680	590
Technical provisions – index-linked and unit-linked	R0690	0
TP calculated as a whole	R0700	0
Best Estimate	R0710	0
Risk margin	R0720	0
Other technical provisions	R0730	
Contingent liabilities	R0740	0
Provisions other than technical provisions	R0750	0
Pension benefit obligations	R0760	0
Deposits from reinsurers	R0770	0
Deferred tax liabilities	R0780	0
Derivatives	R0790	0
Debts owed to credit institutions	R0800	0
Financial liabilities other than debts owed to credit institutions	R0810	0
Insurance & intermediaries payables	R0820	0
Reinsurance payables	R0830	26.042
Payables (trade, not insurance)	R0840	0
Subordinated liabilities	R0850	0
Subordinated liabilities not in BOF	R0860	0
Subordinated liabilities in BOF	R0870	0
Any other liabilities, not elsewhere shown	R0880	13.767
Total liabilities	R0900	198.457
Excess of assets over liabilities		Solvency II value
Excess of assets over liabilities	R1000	282.556

# S.05.01 #1

Non-life					Direct busine	ss and accepted proportio	nal reinsurance			
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090
Premiums written										
Gross - Direct Business	R0110	0	0	0		0 0	0	0	37.608	6
Gross - Proportional reinsurance accepted	R0120	22.704	4.639	0		0 0	86.762	30.922	14.114	•
Gross - Non-proportional reinsurance accepted	R0130									
Reinsurers' share	R0140	374	0	0		0 0	35.937	12.544	17.958	5
Net	R0200	22.330	4.639	0		0 0	50.825	18.378	33.764	
Premiums earned										
Gross - Direct Business	R0210	0	0	0		0 0	) C	0	37.608	6
Gross - Proportional reinsurance accepted	R0220	20.388	4.606	0		0 0	86.762	30.912	14.114	•
Gross - Non-proportional reinsurance accepted	R0230									
Reinsurers' share	R0240	374	0	0		0 0	36.151	12.544	17.958	5
Net	R0300	20.014	4.606	0		0 0	50.611	18.368	33.764	•
Claims incurred										
Gross - Direct Business	R0310	0	0	0		0 0	0	0	1.009	
Gross - Proportional reinsurance accepted	R0320	18.837	4.795	0		0 0	29.861	-1.950	20.732	2
Gross - Non-proportional reinsurance accepted	R0330									
Reinsurers' share	R0340	0	0	0		0 0	-4.012	-1.644	251	
Net	R0400	18.837	4.795	0		0 0	33.873	-306	21.490	
Changes in other technical provisions										
Gross - Direct Business	R0410	0	0	0		0 0	C	0	0	
Gross - Proportional reinsurance accepted	R0420	0	0	0		0 0	) C	0	0	
Gross - Non-proportional reinsurance accepted	R0430									
Reinsurers' share	R0440	0	0	0		0 0	0	0	0	
Net	R0500	0	0	0		0 0	C	0	0	
Expenses incurred	R0550	1.389	320	0		0 0	) 774	517	-711	
Administrative expenses										
Other expenses	R1200									
Total expenses	R1300									

# S.05.01 #2

Non-life		Direct busin	ess and accepted proporti	onal reinsurance		Accepted non-pro	portional reinsurance		Total
		Legal expenses insurance	Assistance	Miscellaneous financial loss	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance	
		C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0200
Premiums written									
Gross - Direct Business	R0110		0	0 0					37.608
Gross - Proportional reinsurance accepted	R0120		0	0 10.030					169.171
Gross - Non-proportional reinsurance accepted	R0130				(	)	0 0		0 0
Reinsurers' share	R0140		0	0 8.747	(	)	0 0	)	75.560
Net	R0200		0	0 1.283	(	)	0 0	)	131.219
Premiums earned									
Gross - Direct Business	R0210		0	0 83					37.691
Gross - Proportional reinsurance accepted	R0220		0	0 10.010					166.792
Gross - Non-proportional reinsurance accepted	R0230				(	)	0 0	)	0
Reinsurers' share	R0240		0	0 8.747	(	)	0 0	)	) 75.774
Net	R0300		0	0 1.346	(	)	0 0	)	128.709
Claims incurred									
Gross - Direct Business	R0310		0	0 18					1.027
Gross - Proportional reinsurance accepted	R0320		0	0 -157					72.118
Gross - Non-proportional reinsurance accepted	R0330				(	)	0 0	)	0 0
Reinsurers' share	R0340		0	0 0	(	)	0 0	)	-5.405
Net	R0400		0	0 -139	(	)	0 0	)	78.550
Changes in other technical provisions									
Gross - Direct Business	R0410		0	0 0					0
Gross - Proportional reinsurance accepted	R0420		0	0 0					0
Gross - Non-proportional reinsurance accepted	R0430				(	)	0 0	)	0 0
Reinsurers' share	R0440		0	0 0	(	)	0 0	)	0 0
Net	R0500		0	0 0	(	)	0 0	)	0 0
Expenses incurred	R0550		0	0 251	(	)	0 0	)	2.538
Administrative expenses									
Other expenses	R1200								0
Total expenses	R1300								2.538

# S.05.01 #3

Life				l	life			Life re	einsurance	Total
		Health insurance	Insurance with profit participation	Index-linked and unit- linked insurance	Other life insurance	Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations	Health reinsurance	Life reinsurance	
		C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0300
Premiums written										
Gross	R1410		0	0	0 3.617	7 0	0		0	0 3.617
Reinsurers' share	R1420		0	0	0 0	0 0	0		0	0 0
Net	R1500		0	0	0 3.617	7 0	0	)	0	0 3.617
Premiums earned										
Gross	R1510		0	0	0 3.559	9 0	0		0	0 3.559
Reinsurers' share	R1520		0	0	0 0	0 0	0		0	0 0
Net	R1600		0	0	0 3.559	9 0	0		0	0 3.559
Claims incurred										
Gross	R1610		0	0	0 1.742	2 0	0		0	0 1.742
Reinsurers' share	R1620		0	0	0 0	0 0	0		0	0 0
Net	R1700		0	0	0 1.742	2 0	0		0	0 1.742
Changes in other technical provisions										
Gross	R1710		0	0	0 0	0 0	0		0	0 0
Reinsurers' share	R1720		0	0	0 0	0 0	0		0	0 0
Net	R1800		0	0	0 0	0 0	0		0	0 0
Expenses incurred	R1900		0	0	0 247	7 0	0		0	0 247
Other expenses	R2500									0
Total expenses	R2600									247
Total amount of surrenders	R2700		0	0	0 0	C C	0		0	0 0

# S.05.02 #1

#### Premiums, claims and expenses by country

Non-life		Home country	Το	n)	Total		
			FR	GB	LU	NO	
		C0080	C0090	C0090	C0090	C0090	C0140
Premiums written							
Gross - Direct Business	R0110	37.608	0	0	0	0	37.608
Gross - Proportional reinsurance accepted	R0120	4.423	11.652	54.982	11.239	86.875	169.171
Gross - Non-proportional reinsurance accepted	R0130	0	0	0	0	0	C
Reinsurers' share	R0140	0	190	39.136	184	36.050	75.560
Net	R0200	42.031	11.461	15.846	11.056	50.825	131.219
Premiums earned			I				1
Gross - Direct Business	R0210	37.691	0	0	0	0	37.691
Gross - Proportional reinsurance accepted	R0220	4.452	10.456	54.923	10.086	86.875	166.792
Gross - Non-proportional reinsurance accepted	R0230	0	0	0	0	0	C
Reinsurers' share	R0240	0	190	39.350	184	36.050	75.774
Net	R0300	42.143	10.266	15.573	9.902	50.825	128.709
Claims incurred							1
Gross - Direct Business	R0310	1.027	0	0	0	0	1.027
Gross - Proportional reinsurance accepted	R0320	4.440	9.769	42.413	9.423	6.073	72.118
Gross - Non-proportional reinsurance accepted	R0330	0	0	0	0	0	C
Reinsurers' share	R0340	0	0	2.107	0	-7.512	-5.405
Net	R0400	5.467	9.769	40.306	9.423	13.585	78.550
Changes in other technical provisions			I				1
Gross - Direct Business	R0410	0	0	0	0	0	C
Gross - Proportional reinsurance accepted	R0420	0	0	0	0	0	C
Gross - Non-proportional reinsurance accepted	R0430	0	0	0	0	0	C
Reinsurers' share	R0440	0	0	0	0	0	C
Net	R0500	0	0	0	0	0	C
Expenses incurred	R0550	887	129	328	124	1.070	2.538
Other expenses	R1200						C
Total expenses	R1300						2.538

# S.05.02 #2

Life		Home country	Top 5 countries (by amount	t of gross premiums	Total
			FR	LU	
		C0220	C0230	C0230	C0280
Premiums written					
Gross	R1410	0	1.841	1.776	3.61
Reinsurers' share	R1420	0	0	0	(
Net	R1500	0	1.841	1.776	3.61
Premiums earned					
Gross	R1510	0	1.812	1.747	3.559
Reinsurers' share	R1520	0	0	0	(
Net	R1600	0	1.812	1.747	3.559
Claims incurred					
Gross	R1610	0	887	855	1.742
Reinsurers' share	R1620	0	0	0	
Net	R1700	0	887	855	1.742
Changes in other technical provisions					
Gross	R1710	0	0	0	
Reinsurers' share	R1720	0	0	0	(
Net	R1800	0	0	0	(
Expenses incurred	R1900	0	126	121	24
Other expenses	R2500				(
Total expenses	R2600				24

# S.12.01 #1

Life and Health SLT Technical Provisions															
		Insurance with profit participation	Inde	k-linked and unit-linked insi	urance		Other life insurance		Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations			Life reinsurance			Total (Life other than health insurance, incl. Unit-Linked)
				Contracts without options and guarantees	Contracts with options and guarantees		Contracts without options and guarantees	Contracts with options and guarantees			Insurance with profit participation	Index-linked and unit- linked insurance		Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations	
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150
TP calculated as a whole	R0010	(	0	0			0		0	0	(	D	0 0	0	0
Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default	R0020	(	0	0			0		0	0	(	D	0 0	0	0
Technical provisions calculated as a sum of BE and RM (Non-Replicable portfolio)															
Best Estimate															
Gross Best Estimate	R0030	ſ	D	0	(	)	C	(	0 0	1.653	(	D	1.653	0	1.653
Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default	R0080	(	D	0	(	)	C	0	0 0	0	(	D	0 0	0	0
Best estimate minus recoverables from reinsurance and SPV - total	R0090	(	D	0	(	)	C	(	0 0	1.653					1.653
Risk margin	R0100	(	D	0			0		0	590	(	D	590	0	590
Amount of the transitional on Technical Provisions															
TP calculated as a whole	R0110	(	D	0			0		0	0					0
Best Estimate	R0120	(	D	0	(	)	C	(	0 0	0					0
Risk margin	R0130	(	D	0			0		0	0					0
Technical provisions - total	R0200	(	D	0			0		0	2.243					2.243
Technical provisions minus recoverables from reinsurance and SPV - total	R0210	(	D	0			0		0	2.243	(	D	2.243	0	2.243
Best Estimate of products with a surrender option	R0220	(	D	0			0		0	0					0

# S.12.01 #2

Life and Health SLT Technical Provisions							
			Health insurance		Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Health reinsurance	Total (Health similar to life insurance)
			Contracts without options and guarantees	Contracts with options and guarantees			
		C0160	C0170	C0180	C0190	C0200	C0210
TP calculated as a whole	R0010	0			0	0	0
Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default	R0020	0			0	0	C
Technical provisions calculated as a sum of BE and RM (Non-Replicable portfolio)							
Best Estimate							
Gross Best Estimate	R0030		0	C	0	0	C
Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default	R0080		0	C	0	0	C
Best estimate minus recoverables from reinsurance and SPV - total	R0090		0	C	0	0	C
Risk margin	R0100	C			0	0	C
Amount of the transitional on Technical Provisions							
TP calculated as a whole	R0110	0			0	0	C
Best Estimate	R0120		0	C	0	0	C
Risk margin	R0130	0			0	0	C
Technical provisions - total	R0200	0			0	0	C
Technical provisions minus recoverables from reinsurance and SPV - total	R0210	0			0	0	(
Best Estimate of products with a surrender option	R0220	0			0		C

# QRT 17.01 #1

Non-Life Technical Provisions													
								pted proportional reinsurar					
		Medical expense	Income protection	Workers' compensation		Other motor insurance		Fire and other damage		Credit and suretyship	Legal expenses	Assistance	Miscellaneous financi
		insurance	insurance	insurance	insurance		transport insurance	to property insurance	insurance	insurance	insurance		loss
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130
TP calculated as a whole	R0010		0 (	0	0	0	0	0 (	)	0	0	0	0
Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default	R0050		0 0	)	0	0	0	0 0	)	0	0	0	0
Technical provisions calculated as a sum of BE and RM (Non-Replicable portfolio)													
Best Estimate													
Premium provisions													
Gross - Total	R0060	3.95	5 45	5	0	0	0	0 214	1	0	0	0	0 2
Gross - accepted non-proportional reinsurance business	R0090												
Total recoverables from reinsurance and SPV before the adjustment for expected losses due to counterparty default	R0100		0 (	0	0	0	0 1.04	7 (	)	0	0	0	0
Net Best Estimate of Premium Provisions	R0150	3.95	5 45	5	0	0	0 -1.04	7 214	1	0	0	0	0 2
Claim provisions													
Gross - Total	R0160	8.42	6.794	1	0	0	0 74.86	2 22.480	27.42	0	0	0	0 8
Gross - Direct Business	R0170		0 (	0	0	0	0	0 (	1.91	1	0	0	0
Gross - accepted proportional reinsurance business	R0180	8.42	6.794	1	0	0	0 74.86	2 22.480	25.50	8	0	0	0 8
Gross - accepted non-proportional reinsurance business	R0190												
Total recoverables from reinsurance and SPV before the adjustment for expected losses due to counterparty default	R0200	(	0 (	0	0	0	0 25.50	5 4.354	4 39	9	0	0	0
Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses	R0210		0 (	0	0	0	0 25.50	5 4.354	4 39	9	0	0	0
Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default	R0240		0 (	0	0	0	0 25.50	5 4.35	4 39	9	0	0	0
Net Best Estimate of Claims Provisions	R0250	8.42	6.794	1	0	0	0 49.35	7 18.12	5 27.02	0	0	0	0 8
Total Best estimate - gross	R0260	12.38	1 6.839	9	0	0	0 74.86	2 22.694	4 27.42	0	0	0	0 1.0
Total Best estimate - net	R0270	12.38	1 6.839	9	0	0	0 48.31	0 18.340	27.02	0	0	0	0 1.0
Risk margin	R0280	1.84	2 1.017	7	0	0	0 4.22	6 1.60	4 2.36	4	0	0	0
Amount of the transitional on Technical Provisions													
TP calculated as a whole	R0290		0 (	0	0	0	0	0 0	0	0	0	0	0
Best Estimate	R0300		0 (	0	0	0	0	0 0	0	0	0	0	0
Risk margin	R0310		0 (	0	0	0	0	0 0	0	0	0	0	0
Technical provisions - total													
Technical provisions - total	R0320	14.22	3 7.856	5	0	0	0 79.08	8 24.29	29.78	3	0	0	0 1.1
Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default	R0330		0 0	0	0	0	0 26.55	2 4.35	4 39	9	0	0	0
Technical provisions minus recoverables from reinsurance and SPV - total	R0340	14.22	3 7.856	5	0	0	0 52.53	5 19.94	4 29.38	4	0	0	0 1.1

# QRT 17.01 #2

Non-Life Technical Provisions			Accepted non-pro	portional reinsurance		Total
		Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance	-
		C0140	C0150	C0160	C0170	C0180
TP calculated as a whole	R0010	0		0 0	) (	)
Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default	R0050	0		0 0	) (	)
Technical provisions calculated as a sum of BE and RM (Non-Replicable portfolio)						
Best Estimate						
Premium provisions						
Gross - Total	R0060	0		0 0	) ()	4.42
Gross - accepted non-proportional reinsurance business	R0090	0		0 0	) (	)
Total recoverables from reinsurance and SPV before the adjustment for expected losses due to counterparty default	R0100	0		0 0	) (	1.04
Net Best Estimate of Premium Provisions	R0150	0		0 0	) (	3.37
Claim provisions						
Gross - Total	R0160	0		0 0	) (	140.83
Gross - Direct Business	R0170					1.93
Gross - accepted proportional reinsurance business	R0180					138.90
Gross - accepted non-proportional reinsurance business	R0190	0		0 0	) (	)
Total recoverables from reinsurance and SPV before the adjustment for expected losses due to counterparty default	R0200	0		0 0	) (	30.25
Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses	R0210	0		0 0	) (	30.25
Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default	R0240	0		0 0	) (	30.25
Net Best Estimate of Claims Provisions	R0250	0		0 0	) (	110.57
Total Best estimate - gross	R0260	0		0 0	) (	) 145.25
Total Best estimate - net	R0270	0		0 0	) (	) 113.95
Risk margin	R0280	0		0 0	) (	) 11.14
Amount of the transitional on Technical Provisions						
TP calculated as a whole	R0290	0		0 0	) (	)
Best Estimate	R0300	0		0 0	) (	)
Risk margin	R0310	0		0 0	) (	)
Technical provisions - total						
Technical provisions - total	R0320	0		0 0	) (	156.40
Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default	R0330	0		0 0	) (	31.30
Technical provisions minus recoverables from reinsurance and SPV - total	R0340	0		0 0	) (	) 125.09

# QRT 19.01 #1

Gross Claims Paid (non-c	umulative)													
All lines of business							Development year							
Year		0	1	2	3	4	5	6	7	8	9	10	In current year	Sum of years (cumulative)
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0170	C0180
Prior	R0100												0	0
N-14	R0110	0	0	0	0	0	0	0	0	0	C	0	0	0
N-13	R0120	0	0	0	0	0	0	0	0	0	C	0	0	0
N-12	R0130	0	0	0	0	0	0	0	0	0	C	0	0	0
N-11	R0140	0	0	0	0	0	0	0	0	0	C	0	0	0
N-10	R0150	1.186	4.206	5.777	2.051	2.963	582	-443	176	155	C	0 0	0	16.652
N-9	R0160	30.397	4.326	2.807	2.874	-301	-868	44	49	635	14		14	39.976
N-8	R0170	2.764	6.773	7.193	403	14	27	9	261	0			0	17.445
N-7	R0180	4.546	13.356	4.312	5.505	3.929	251	2.361	1.294				1.294	35.555
N-6	R0190	3.849	21.046	3.825	116	1.742	-500	-3.585					-3.585	26.493
N-5	R0200	621	3.181	1.996	932	436	28						28	7.194
N-4	R0210	27.828	57.353	3.874	10.370	4.845							4.845	104.270
N-3	R0220	163	1.081	4.309	3.696								3.696	9.249
N-2	R0230	7.611	31.768	14.983									14.983	54.362
N-1	R0240	19.754	17.559										17.559	37.312
N	R0250	13.249											13.249	13.249
Total													52.083	361.756

# QRT 19.01 #2

Gross undiscounted E	Best Estimate	Claims Provisions											
All lines of business							Development year						
Year		0	1	2	3	4	5	6	7	8	9	10	Year end (discounted data)
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0360
Prior	R0100												0
N-14	R0110	0	0	0	0	0	0	0	0	0	0	(	0 0
N-13	R0120	0	0	0	0	0	0	0	0	0	0	(	0 0
N-12	R0130	0	0	0	0	0	0	0	0	0	0	(	0 0
N-11	R0140	0	0	0	0	0	0	0	0	0	0	(	0 0
N-10	R0150	29.579	13.621	7.741	6.473	3.198	976	813	345	10	1		1
N-9	R0160	13.544	12.738	8.175	4.750	3.613	1.936	1.629	1.423	123	149		134
N-8	R0170	26.059	11.317	3.529	3.163	3.004	2.899	2.809	688	10.532			9.506
N-7	R0180	43.845	29.334	21.119	14.464	7.240	6.115	3.985	7.512				6.775
N-6	R0190	14.782	8.203	5.187	2.442	1.288	632	527					473
N-5	R0200	15.413	14.105	12.552	11.323	10.867	10.103						9.112
N-4	R0210	68.796	17.052	15.090	6.803	1.191							1.073
N-3	R0220	14.163	10.843	7.733	6.345								5.787
N-2	R0230	79.409	41.513	30.226									27.290
N-1	R0240	62.458	36.147										32.610
N	R0250	53.131											48.077
Total													140.838

# QRT 23.01

Own funds						
Basic own funds		Total	Tier 1 — unrestricted	Tier 1 — restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Ordinary share capital (gross of own shares)	R0010	89.987	89.987		0	
Share premium account related to ordinary share capital	R0030	0	0		0	
Initial funds, members' contributions or the equivalent basic own - fund item for	R0040	0	0		0	
mutual and mutual-type undertakings Subordinated mutual member accounts	R0050	0			0	
Surplus funds	R0070	0	0			
Preference shares	R0090	0	3		0	
Share premium account related to preference shares	R0110	0		(	-	
Reconciliation reserve	R0130	189.759	189.759			
Subordinated liabilities	R0140	0	100.100		0	
An amount equal to the value of net deferred tax assets	R0160	2.810			,	2.81
Other items approved by supervisory authority as basic own funds not specified	R0180	0	0	(	0	2.01
above			5		Ū	
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds. Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds.	R0220	0				
own lunds						
Deductions		Total	Tier 1 — unrestricted	Tier 1 — restricted	Tier 2	Tier 3
Deductions for participations in financial and credit institutions	R0230	0	0		0	
Total basic own funds after deductions		Total	Tier 1 — unrestricted	Tier 1 — restricted	Tier 2	Tier 3
Total basic own funds after deductions	R0290	282.556	279.746			
Ancillary own funds		Total	Tier 1 — unrestricted	Tier 1 — restricted	Tier 2	Tier 3
Unpaid and uncalled ordinary share capital callable on demand	R0300	0			0	
Unpaid and uncalled initial funds, members' contributions or the equivalent basic	R0310	0			0	
own fund item for mutual and mutual - type undertakings, callable on demand						
Unpaid and uncalled preference shares callable on demand	R0320	0			0	
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330	0			0	
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340	0			0	
Letters of credit and guarantees other than under Article 96(2) of the Directive	R0350	0			0	
2009/138/EC Supplementary members calls under first subparagraph of Article 96(3) of the	R0360	0			0	
Directive 2009/138/EC						
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370	0			0	
Other ancillary own funds	R0390	0			0	
Total ancillary own funds	R0400	0			0	
•						
Total available own funds to meet the SCR	R0500	282.556	279.746	0	0	2.81
Total available own funds to meet the MCR	R0510	279.746	279.746		0	
Total eligible own funds to meet the SCR	R0540	282.556	279.746	0	0	2.81
Total eligible own funds to meet the MCR	R0550	279.746	279.746	0	0	
				L		
Solvency Capital Requirement	R0580	89.019				
Minimum capital requirement	R0600	26.242				
Ratio of Eligible own funds to SCR	R0620	317,412%				
Ratio of Eligible own funds to MCR	R0640	1.066,038%				
		-	<u> </u>			
Reconciliation reserve		Total				
		C0060				
Excess of assets over liabilities	R0700	282.556				
Own shares (held directly and indirectly)	R0710	0				
Foreseeable dividends, distributions and charges	R0720	0				
Other basic own fund items	R0730	92.797				
Adjustment for restricted own fund items in respect of matching adjustment	R0740	0				
portfolios and ring fenced funds Reconciliation reserve	R0760	189.759				
Neurinau0111838178	10/00	189.759				
Expected profile isoluded in future promiume (EDIED) Life husis and	B0770					
Expected profits included in future premiums (EPIFP) - Life business	R0770	0				
Expected profits included in future premiums (EPIFP) - Non-life business	R0780	0				
Total Expected profits included in future premiums (EPIFP)	R0790	0				

# QRT 25.01

Solvency Capital Requirement - for undertakings on Standard Formula	12 Z0010	2. Degular reporting			
	12 20010	2: Regular reporting			
Solvency Capital Requirement calculated using standard formula		Net solvency capital requirement	Gross solvency capital requirement	Allocation from adjustments due to RFF and Matching adjustments portfolios	
		C0030	C0040	C0050	
Market risk	R0010	6.986			
Counterparty default risk	R0020	35.267	35.267	,	
Life underwriting risk	R0030	5.613	5.613	8	
Health underwriting risk	R0040	27.194	27.194	1	
Non-life underwriting risk	R0050	78.816	78.816	ŝ	
Diversification	R0060	-43.317	-43.317		
Intangible asset risk	R0070	C			
Basic Solvency Capital Requirement	R0100	110.558	110.558		
Calculation of Solvency Capital Requirement		C0100			
Adjustment due to RFF/MAP nSCR aggregation	R0120	C	]		
Operational risk	R0130	6.479	•		
Loss-absorbing capacity of technical provisions	R0140	C			
Loss-absorbing capacity of deferred taxes	R0150	-28.019	1		
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC (transitional)	R0160	C			
Solvency capital requirement, excluding capital add-on	R0200	89.019			
Capital add-ons already set	R0210	C			
Solvency Capital Requirement	R0220	89.019			
Other information on SCR					
Capital requirement for duration-based equity risk sub-module	R0400	C			
Total amount of Notional Solvency Capital Requirements for remaining part	R0410	C			
Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420	C			
Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	R0430	C			
Diversification effects due to RFF nSCR aggregation for article 304	R0440	C			
Method used to calculate the adjustment due to RFF/MAP nSCR aggregation	R0450	4: No adjustment			
Net future discretionary benefits	R0460	C			
		C0109			
Approach based on average tax rate	R0590	1: Yes			
Calculation of loss absorbing capacity of deferred taxes		Before the shock	After the shock	LAC DT	
		C0110	C0120	C0130	
DTA	R0600	2.810			
DTA carry forward	R0610	2.810			
DTA due to deductible temporary differences	R0620	C			
DTL	R0630	C	C		
LAC DT	R0640			-28.01	
LAC DT justified by reversion of deferred tax liabilities	R0650			-28.01	
LAC DT justified by reference to probable future taxable profit	R0660				
LAC DT justified by carry back, current year	R0670				
LAC DT justified by carry back, future years	R0680				
Maximum LAC DT	R0690				

# QRT 28.01

Minimum Capital Requirement - Only life or only non-life insuranc	e or reinsurance	activity	
Linear formula component for non-life insurance and reinsurance obligations		MCR components	
		C0010	
MCR Non-Life Result	R0010	26.207	
		Net (of reinsurance/SPV)	Net (of reinsurance) writter
		best estimate and TP calculated as a whole	premiums in the last 12 months
		C0020	C0030
Medical expense insurance	R0020	12.381	22.33
Income protection insurance	R0030	6.839	4.63
Workers' compensation insurance	R0040	0	
Motor vehicle liability insurance	R0050	0	
Other motor insurance	R0060	0	
Marine, aviation and transport insurance	R0070	48.310	50.82
Fire and other damage to property insurance	R0080	18.340	18.37
General liability insurance	R0090	27.020	39.01
Credit and suretyship insurance	R0100	0	
Legal expenses insurance	R0110	0	
Assistance	R0120	0	
Miscellaneous financial loss	R0130	1.063	
Non-proportional health reinsurance	R0140	0	
Non-proportional casualty reinsurance	R0150	0	
Non-proportional marine, aviation and transport reinsurance	R0160	0	
Non-proportional property reinsurance	R0170	0	
Linear formula component for life insurance and reinsurance obligations		MCR components	
		C0040	
MCR Life Result	R0200	35	
		Net (of reinsurance/SPV)	Net (of reinsurance/SPV)
		best estimate and TP	total capital at risk
		calculated as a whole C0050	C0060
Obligations with profit participation - guaranteed benefits	R0210	0	
Obligations with profit participation - future discretionary benefits	R0220	0	
Index-linked and unit-linked insurance obligations	R0230	0	
Other life (re)insurance and health obligations	R0240	1.653	
Capital at risk for all life (re)insurance obligations	R0250		
Overall MCR calculation		MCR components	
		C0070	
Linear MCR	R0300	26.242	
SCR	R0310	89.019	
MCR cap	R0320	40.058	
MCR floor	R0330	22.255	
Combined MCR	R0340	26.242	
Absolute floor of the MCR	R0350	3.946	
Minimum capital requirement	R0400	26.242	