# Maersk Insurance A/S Solvency and Financial Condition Report Financial Year ended 31<sup>st</sup> December 2023

## **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 was established in 2011 as a captive insurance company for the A.P. Moller – Maersk Group (APMM, the group or parent company). As of September 2023, MIAS received a full insurance license and is now allowed to insure third-party risks outside of APMM. These third-party risks are limited to APMM clients buying services with APMM along with business interests that APMM have a contractual or regulatory responsibility towards.

MIAS' strategy is to insure assets, liabilities, obligations and employees within or under management control of APMM. With the full insurance license, this is extended to include assets, liabilities and employees of related third-parties, initially focusing on customer assets in APMM's possession. 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. 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 2023 was a profit of USD 57.232 thousand and the solvency ratio by end of 2023 was 367 %.

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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 as a captive insurance company for APMM. As of 22 September 2023 MIAS received a full insurance license and is now allowed to insure third-party risks outside APMM. These third-party risks are limited to APMM clients buying services with APMM along with business interests that APMM have a contractual or regulatory responsibility towards.

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 January 2024, the MIAS' Board of Directors consists of:

- Niclas Erlandson (Chairman)
- Fatiha Benali
- Ingrid Ebner
- Casper Munch (replaced Martin Herrstedt during 2023)
- 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' 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. 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 handling 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' 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.

MIAS' strategy is to insure assets, liabilities, obligations and employees within or under management control of APMM. With the full insurance license, this is extended to include assets, liabilities and employees of third-parties, initially focusing on customer assets in APMM's possession.

During 2023, MIAS changed status from being a captive insurance company for APMM to a fully-fledged Danish insurance company. The change in status did not lead to any change in underwritten business for 2023, but it will allow MIAS to provide services related to third-parties outside APMM in the future. MIAS applied for a Cargo license in June 2023, intended for providing cargo cover to associated third parties of APMM.

## A.2 Insurance Results

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

MIAS' gross written premium in 2023 was USD 165.367 thousand with a return on equity of 19 %. MIAS' Underwriting profit (Technical Profit) for 2023 amounts to a profit of USD 60.028 thousand (2022: profit of USD 59.145 thousand).

Year	Total gross written premium	Total net earned premium	Total net claims incurred	Operating Expenses	Profit before tax	Combined ratio
2012	69.531	45.112	-30.768	-2.736	12.121	74%
2013	49.919	50.797	-33.960	-2.567	14.599	73%
2014	82.075	59.579	-28.360	-1.557	30.365	59%
2015	76.445	54.239	-40.458	-258	14.580	82%
2016	50.200	23.129	-429	1.628	26.380	60%
2017	52.060	4.531	-1.451	2.864	8.935	89%
2018	60.292	12.217	-3.299	3.282	16.766	79%
2019	135.001	34.432	-15.248	437	24.841	74%
2020	35.068	63.871	-66.152	-1.872	-413	104%
2021	141.406	88.835	-65.991	-4.828	18.553	87%
2022	210.396	132.267	-71.915	-2.772	67.053	72%
2023	165.367	114.873	-54.386	-5.323	75.361	67%

The 2023 Underwriting results split per industry segment:

Segment	Gross premium written	Gross premium income	Change in risk margin	Gross claims incurred	Gross operating expenses*	Result of ceded business	Technical interest	Technical Result	Profit before tax
Marine	74.372	74.372	208	-39.915	-484	-6.176	928	28.932	
Fire	28.986	28.986	-263	-2.268	-978	-11.699	361	14.139	
General Liability	21.669	21.669	105	1.628	-1.010	-7.669	270	14.993	
Miscellaneous Financial									
Loss	1.622	1.780	-89	-956	-82	-427	22	249	
Income Protection	3.598	3.635	-316	-3.719	-336	-134	45	-825	
Medical Expense Insurance	30.233	30.367	-286	-28.881	-2.307	-1.515	379	-2.244	
Life Reinsurance	4.886	5.024	-67	-2.721	-126	-185	63	1.988	
Total	165.367	165.833	-707	-76.833	-5.323	-27.806	2.068	57.232	75.361

\*including reinsurance commission

All values are in USD thousands

For 2024, 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 2024.

## A.3 Investment Results

MIAS' 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' investment policy reflects MIAS' 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' investment portfolio and the result from investment activities:

Instrument	2023	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	11.700	3.636	634	2.844	3.680	3.120	1.225	973	391
Interest deposits	11.693	3.206	-62	-190	331	-99	31	-115	6
Value adjustments	745	-165	-35	1.102	1.237	1.545	1.162	188	-315
Total	24.138	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' management consists of the following part-time employees:

- Lars Henneberg, Managing Director, who holds both the Actuarial (Non-Life), Risk Management and the Compliance key functions until 31 December 2023
- Steen Ragn, Key function for Actuarial (Life) and the appointed actuary
- Lotte Petersen, who holds the Internal Audit key function
- Sari De Martin, Key function for Actuarial (non-life), employed as per 1 January 2024
- Irena Kulikova, Key function for Risk Management, employed as per 1 January 2024
- Christina Russ, Key function for Compliance, employed as per 1 January 2024

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

LFV § 105 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 shown behaviour that implies that they cannot manage the job properly

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 154 and 155 of LFV, 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 assesses 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 checks 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. A part of claims handling has been sub-outsourced from the parent company to an external party. The Risk Management, Actuarial, Claims handling and Compliance functions are outsourced to an external party.

## **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 license, strategy, risk appetite, and procedure manual. MIAS estimates the desired and acceptable level of risk, overall and for each sub-category. 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 275 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. MIAS uses an external insurance company for most risks and local fronting companies where local subscription is required.

In 2024, MIAS will start to write limited P&I cover. MIAS applied for a Cargo license in June 2023 opting for providing cargo cover to associated third risk parties of APMM.

#### **Risk appetite**

MIAS' 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 2023
Marine H&M, War, P&I	USD 25m per occurence
<b>1st Party</b> Property damage, Business interruption, Extra expenses	USD 25m per occurence
<b>3rd Party Liability</b> Terminal operators, Freight Services, Umbrella, Environmental, General & Products, Extended contractual liabilities	USD 25m per occurence
<b>Financial Lines</b> Crime, D&O, Pension Trust, Professional Liability, Employment practices	USD 25m per occurence
Cyber	USD 25m per occurence
<b>3rd party liability/Property damage (blended)</b> Container handling equipment	USD 25m per occurence
Employee Benefit Insurance	USD 25m per occurence

## Net risk retention

MIAS' 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' net retention (net of reinsurance cover) is for the policy period 2023 and 2024.

Description	2023 exposure	2024 exposure
Marine H&M, War	USD 18,75m per occurence	USD 18,75m per occurence
Marine P&I	Risk did not exist	USD 3/5m per occurrence USD 11m in annual aggregate

<b>1st Party</b> Property damage, Business interruption, Extra expenses	USD 25m per occurence	USD 25m per occurence	
<b>3rd Party Liability</b> Terminal operators, Freight Services, , Environmental, General & Products, Extended contractual liabilities	USD 25m per occurence	USD 25m per occurrence	
<b>3rd Party Liability</b> Umbrella	USD 25m per occurrence	USD 25m per occurrence (attaching only at USD 5m for certain risks)	
3rd Party Liability Maersk Value Protect	USD 5m per occurrence USD 25m in annual aggregate	USD 10m per occurrence USD 25m in annual aggregate	
Financial Lines Crime, D&O, Special Risk	USD 5m per occurrence	USD 5m per occurrence	
Financial Lines Pension Trust, Professional Liability	USD 10m per occurrence	USD 10m per occurrence	
Financial Lines Employment practices	Risk ceased to exist as per 1 June 2023		
Cyber	USD 7,5m per occurence	USD 7,5m per occurrence	
<b>3rd party liability/Property damage (blended)</b> Container handling equipment	USD 5m per occurence	USD 5m per occurrence	
Employee Benefit Insurance	USD 5m per occurence	USD 5m per occurrence	

Running alongside the exposures for 2023 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> </ul>	MIAS' guidelines state that exposures against a reinsurance company of USD 50m to USD 100m requires a rating of minimum A+. There is one reinsurer, Fidelis, with a total

Description	Limit	Actual exposure
	• Reinsurers must have a minimum rating S&P A- or similar	capacity of USD 80m in 2023 and the policy is therefore not adhered to. This exemption was approved by MIAS' board for 2023. The capacity of Fidelis is USD 35,9m for 2024 and is therefore within the limit of the policy.
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 and deposits 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

 $\ast$  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 2023. The total assets increase from statutory accounting (USD 521.184 thousand) to Solvency II (USD 524.178 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	4.541	4.369
Deferred tax assets	-	3.073
Liquid Funds	7.562	7.562
Short term deposits	207.500	209.074
Loan to APMM	235.736	235.736
Reinsurers' Share of Technical Provisions	43.956	43.874
Claims Provision	43.010	43.010
Premium Provision	946	864
Insurance debtors	21.889	20.490
Total assets	521.184	524.178

All values are in USD thousands

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

The Reinsurers' share of premium provisions reduce from accounting treatment (USD 946 thousand) to Solvency II (USD 864 thousand) due to discounting. The discounting effect amounts to USD 82 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 1.574 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	75.992	20.569	21.077	1.589	7.730	7.266	1.106	135.327
Outstanding claims	83.202	22.707	23.073	1.739	8.463	7.955	1.211	148.350
Discount effect	-7.210	-2.138	-1.996	-150	-733	-689	-105	-13.023
Premium Provision	0	217	0	62	3.882	12	263	4.436
UPR	0	240	0	68	4.250	13	288	4.859
Discount effect	0	-23	0	-6	-368	-1	-25	-423

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 12.443 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.

Claims provision: MIAS' classes of risk are low frequency, high severity and as such MIAS does not have a high number of claims. MIAS' 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

	Statutory Accounting	Solvency II
Gross technical provisions	152.630	152.206
Claims Provision	135.328	135.327
Premium provision	4.859	4.436
Risk margin	12.443	12.443
Payables	2.071	2.050
Tax payables	18.290	19.545
Reinsurance payables	14.020	14.020
Total liabilities	187.011	187.821

The table below sets out MIAS's liabilities under Statutory Accounting and Solvency II as of 31 December 2023.

All values are in USD thousands

#### **Technical provisions**

The gross premium provisions decrease from the accounting treatment (USD 4.859 thousand) to Solvency II (USD 4.436 thousand) due to discounting. The discounting effect on the premium provisions amount to USD 423 thousand.

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

MIAS includes the risk margin of USD 12.443 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	31.12.2023	31.12.2022	Development
Ordinary share capital	89.987	89.987	-
Reconciliation reserve	243.297	189.759	53.538
Own funds (Tier 1)	333.284	279.746	53.538
Own funds (Tier 3)	3.073	2.810	264
Total own funds	336.357	282.556	53.801

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 2023, the equity according to statutory accounts is USD 334.173 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 3.073 thousand
- Discounting of the reinsurers' share of premium provisions: USD 82 thousand
- Discounting of the gross premium provisions: USD 423 thousand
- Difference in tax payables between Solvency II and statutory accounting: USD 1.255 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.

	31.12.2023	31.12.2022
Market risk	5.237	6.986
Counterparty Default risk	44.049	35.267
Non-Life Underwriting risk	76.749	78.816
Health Underwriting Risk	31.908	27.194
Life Underwriting Risk	6.055	5.613
Diversification effects	-47.199	-43.317
Basic SCR	116.800	110.558
		0
Operational risk	5.055	6.479
LACDT adjustment	-30.098	-28.019
SCR	91.757	89.019
Capital available	336.357	282.556
Solvency ratio	367%	317%

All monetary values are in USD thousands

There is a varied development in the risks from 2022 to 2023. The most significant movements from 2022 to 2023 are:

- Market Risk decreased due to a decrease in interest rates and net technical provisions
- Counterparty Default Risk increased primarily due to an increase in the loan to APMM
- Health Underwriting Risk and Life Underwriting Risk increased due to increase in exposure
- Non-Life Underwriting Risk decreased due to a decrease in premium volume and technical provisions
- The LACDT adjustment increased due to the change of tax rate from 25,2% to 26% as of 1 January 2024.

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 2023 amounts to USD 22.939 thousand. This corresponds to the sum of Life MCR and Non-Life MCR.

	31.12.2023	31.12.2022
Life MCR (based on Premiums)	29	35
Non-Life MCR (based on Premiums and Technical Provisions)	20.484	26.207
MCR Floor (25% of SCR)	22.939	22.255
MCR Cap (45% of SCR)	41.291	40.058
Absolute Minimum (EUR 3.7m)	4.089	3.946
Minimum Capital Requirement	22.939	26.242

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 2023 Q4 Top 10 risks

Risk type	Description	Probability & Impact	Triggers	Vulnerabilities	Consequence	Existing 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>	Retrocession cover not responding leading to MIAS exposed to pay claims in excess of their retained risk Negative financial results of MIAS Revised SCR calculation adversely affects solvency margin targets potentially leading to additional capital funding requirements in the long term	<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	Failure to report to Retro, Late reporting to the Retro Lack of understanding of the retro insurance in place due to insufficient documentation in the system, Reinsurer refuses to pay	Lack of (clear) ownership Lack of necessary resources Lack of IT capabilities Incomplete processes	Negative financial result for MIAS Solvency issues and additional capital funding requirements Reputational damage to MIAS and the wider APMM Group	<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>

Catastrophe losses: An event which impacts MIAS on several lines of multiple times on same line of that triggers multiple losses across a5-25 % totakatrophic risk due to terror, war, pandemic, or natural catastrophe etc. Systemic risks triggering multiple sideways losses	understand the potential catastrophe exposures that MIAS is exposed to • Failure to recognize and manage the	Negative financial result for MIAS Revised SCR calculation adversely affects solvency margin targets (140%- 110%)	Stop loss insurance in place     Risk treated in-depth in ORSA-process     Separate "Black Swan"-analysis (stress test of major loss scenarios)
impacts MIAS on several lines of insurance, potentially multiple times on same line of insurance or incident that triggers multiple losses across a	potential catastrophe exposures that MIAS is exposed to • Failure to recognize and manage the	for MIAS • Revised SCR calculation adversely affects solvency margin targets (140%- 110%)	Risk treated in-depth in ORSA-process     Separate "Black Swan"-analysis (stress test of major
several lines of mUSD pandemic, or natural catastrophe etc. • Systemic risks triggering multiple losses across a	catastrophe exposures that MIAS is exposed to • Failure to recognize and manage the	• Revised SCR calculation adversely affects solvency margin targets (140%- 110%)	in ORSA-process • Separate "Black Swan"-analysis (stress test of major
insurance, potentially multiple times on same line of insurance or incident that triggers multiple losses across a	exposures that MIAS is exposed to • Failure to recognize and manage the	calculation adversely affects solvency margin targets (140%- 110%)	• Separate "Black Swan"-analysis (stress test of major
multiple times on same line of insurance or incident that triggers multiple losses across acatastrophe etc. • Systemic risks triggering multiple sideways losses	MIAS is exposed to • Failure to recognize and manage the	adversely affects solvency margin targets (140%- 110%)	Swan"-analysis (stress test of major
same line of insurance or incident that triggers multiple losses across a sideways losses	to • Failure to recognize and manage the	solvency margin targets (140%- 110%)	(stress test of major
insurance or incident that triggers multiple losses across a sideways losses	Failure to recognize and manage the	targets (140%- 110%)	
that triggers multiple multiple sideways losses	recognize and manage the	110%)	1033 3061101103)
losses across a sideways losses	manage the		completed in 2021
		potentially	Quarterly risk
concentrated and across positively		leading to	management reports
positively correlated correlated	impact of	additional capital	including large losses
portfolio of risk policies with		funding	and reinsurance
accepted leading to highly	Failure to	requirements	<ul> <li>Reinsurance</li> </ul>
losses beyond the concentrated	understand		purchased such that
risk appetite exposures	exposure to		retained exposure
Lack of	sideways		remains within risk
reinsurance	(aggregate) losses		appetite
Inadequate or	<ul> <li>High level of</li> </ul>		<ul> <li>Recurring review of</li> </ul>
insufficient	retentions on		solvency/capital and
reinsurance	individual risks		reinsurance structure
response	(line of business) • High level of		Performance and     financial stability in
Unexpected     high number of	Gign level of concentration and		financial stability is evaluated and
individual	positive correlated		reported monthly
occurrences	risk with limited		<ul> <li>Risk exposures are</li> </ul>
across risk	diversification		discussed at board
accepted	effect		meetings whenever
	Concentration		there are
	risk increasing		proposed/new
	with inclusion of		exposures
D L	new lines of		<ul> <li>Mix of risks accepted</li> </ul>
Underwriting	insurance such as		is approved by the
	container handling		board and
	equipment,		subsequently adhered
	medical and life		to and controlled
	insurance for		(ORSA)
	employees and eventually cargo		<ul> <li>Implementation of new operating model</li> </ul>
	insurance		to recreate
	Complex and		diversification in MIAS
	insufficiently		risk profile and
	calibrated		improve possibility for
	reinsurance		recovery of losses
	structure leaves		from business
	holes in protection		<ul> <li>Lowering attachment</li> </ul>
	against sideways		point of Stop
	losses		Loss/Umbrella
	Incomplete		insurance per
	understanding of		occurrence and in the
	how reinsurance		yearly aggregate
	structure works		Actuarial function
	Current     reinsurance		and risk management
	structure biased		function assessing adequacy of
	towards facultative		underwriting policy,
	reinsurance		reserves and
			reinsurance program
			on a continuous basis
			Reinsurance
			protection against
			sideways losses and
			a re-calibrated mix of
			treaty and facultative
			reinsurance (one
			event has a max of
			25mUSD)

		5.05.0/		<b>–</b> 11 <i>i</i>		
Underwriting	Reinsurance default	5-25 % 10-30 mUSD 5-25 %	Reinsurer defaulting or has a significant change of credit rating     vertical second secon	Failure to establish and maintain reinsurance in accordance with the risk appetite and solvency requirement • Failure to comply with MIAS' reinsurance policy, including counter- party rating changes     • No possibility to	Unacceptable 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     • Additional	Reinsurance Policy 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     Energy run-off cover
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>	Additional claims costs Loss to APMM	<ul> <li>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.</li> <li>Monitor exposures and active claims management if claims should occur</li> </ul>
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 captive 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>	Default on MIAS' loan to parent MIAS put in run-off	<ul> <li>Rating of parent company</li> <li>Proximity to Group Finance facilitates a close dialogue</li> </ul>

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	Currently high SCR ratio     Carry forward mechanism allowing MIAS to increase future premiums in case of large losses     Treaty structure will cap maximum loss per event across all lines of business (except Cyber)     Aggregate Excess of loss policy, USD 40m xs USD 110m     Portfolio diversification     Cost neutral underwriting over five years     Reinsurance and stop loss
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	Poor processes for data management     Incomplete processes for underwriting and claims handling     Incomplete organization and unclear accountabilities iro data management     Transactional organization     Complex and widely scattered business organization to collect data from	<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>	Data management officer in place (Selina)     Risk Management Information System (RMIS) in place     SOPs for underwriting and claims handling in place     Organization built in the business to support the processes with clear accountabilities assigned     RMIS tailored and adapted to processes created

# 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	3.073
Pension benefit surplus	R0050	(
Property, plant & equipement held for own use	R0060	C
Investments (other than assets held for index-linked and unit-linked funds)	R0070	209.074
Property (other than for own use)	R0080	(
Participations	R0090	(
Equities	R0100	C
Equities - listed	R0110	C
Equities - unlisted	R0120	C
Bonds	R0130	C
Government Bonds	R0140	C
Corporate Bonds	R0150	C
Structured notes	R0160	C
Collateralised securities	R0170	C
Investment funds	R0180	C
Derivatives	R0190	C
Deposits other than cash equivalents	R0200	209.074
Other investments	R0210	C
Assets held for index-linked and unit-linked funds	R0220	C
Loans & mortgages	R0230	235.736
Loans on policies	R0240	(
Loans & mortgages to individuals	R0250	(
Other loans & mortgages	R0260	235.736
Reinsurance recoverables from:	R0270	43.874
Non-life and health similar to non-life	R0280	43.874
Non-life excluding health	R0290	43.874
Health similar to non-life	R0300	C
Life and health similar to life, excluding health and indexlinked	R0310	C
Health similar to life	R0320	C
Life excluding health and index-linked and unit-linked	R0330	C
Life index-linked and unit-linked	R0340	C
Deposits to cedants	R0350	C
Insurance & intermediaries receivables	R0360	20.490
Reinsurance receivables	R0370	C
Receivables (trade, not insurance)	R0380	C
Own shares	R0390	C
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	7.562
Any other assets, not elsewhere shown	R0420	4.369
Total assets	R0500	524.178

## S.02.01 #2

Liabilities		Solvency II value
Technical provisions – non-life	R0510	150.180
Technical provisions – non-life (excluding health)	R0520	127.830
TP calculated as a whole	R0530	0
Best Estimate	R0540	119.505
Risk margin	R0550	8.325
Technical provisions - health (similar to non-life)	R0560	22.350
TP calculated as a whole	R0570	0
Best Estimate	R0580	18.889
Risk margin	R0590	3.461
Technical provisions - life (excluding index-linked and unitlinked)	R0600	2.026
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	2.026
TP calculated as a whole	R0660	0
Best Estimate	R0670	1.369
Risk margin	R0680	657
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	14.020
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	21.595
Total liabilities	R0900	187.821
Excess of assets over liabilities		Solvency II value
Excess of assets over liabilities	R1000	336.357

## S.05.01 #1

Non-life		Direct business and accepted proportional 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		C					
Gross - Proportional reinsurance accepted	R0120	30.233	3.598	0	0	0	74.371	28.987	15.567	C					
Gross - Non-proportional reinsurance accepted	R0130														
Reinsurers' share	R0140	1.515	134	0	0	0	29.682	10.974	7.828	C					
Net	R0200	28.718	3.464	0	0	0	44.689	18.013	13.840	C					
Premiums earned															
Gross - Direct Business	R0210	0	0	0	0	0	0	0	6.101	C					
Gross - Proportional reinsurance accepted	R0220	30.367	3.635	0	0	0	74.371	28.986	15.567	C					
Gross - Non-proportional reinsurance accepted	R0230														
Reinsurers' share	R0240	1.515	134	0	0	0	29.896	10.974	7.828	C					
Net	R0300	28.852	3.501	0	0	0	44.475	18.012	13.840	C					
Claims incurred															
Gross - Direct Business	R0310	0	0	0	0	0	0	0	1.184	C					
Gross - Proportional reinsurance accepted	R0320	28.989	3.903	0	0	0	41.568	2.838	-2.542	C					
Gross - Non-proportional reinsurance accepted	R0330														
Reinsurers' share	R0340	0	0	0	0	0	25.491	-631	188	C					
Net	R0400	28.989	3.903	0	0	0	16.077	3.469	-1.546	C					
Expenses incurred	R0550	2.142	260	0	0	0	493	979	1.012	C					
Administrative expenses															
Gross - Direct Business	R0610	0	0	0	0	0	0	0	285	C					
Gross - Proportional reinsurance accepted	R0620	2.142	260	0	0	0	492	979	727	C					
Gross - Non-proportional reinsurance accepted	R0630														
Reinsurers' share	R0640	0	0	0	0	0	0	0	0	C					
Net	R0700	2.142	260	0	0	0	492	979	1.012	C					
Total expenses	R1300														

## S.05.01 #2

Non-life		Direct business a	ind accepted propo	tional 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						6.134
Gross - Proportional reinsurance accepted	R0120	0	0	1.590					154.346
Gross - Non-proportional reinsurance accepted	R0130				0	0	0	0	0
Reinsurers' share	R0140	0	0	427	0	0	0	0	50.560
Net	R0200	0	0	1.196	0	0	0	0	109.920
Premiums earned									
Gross - Direct Business	R0210	0	0	111					6.212
Gross - Proportional reinsurance accepted	R0220	0	0	1.670					154.596
Gross - Non-proportional reinsurance accepted	R0230				0	0	0	0	0
Reinsurers' share	R0240	0	0	427	0	0	0	0	50.774
Net	R0300	0	0	1.354	0	0	0	0	110.034
Claims incurred									
Gross - Direct Business	R0310	0	0	11					1.195
Gross - Proportional reinsurance accepted	R0320	0	0	1.041					75.797
Gross - Non-proportional reinsurance accepted	R0330				0	0	0	0	0
Reinsurers' share	R0340	0	0	0	0	0	0	0	25.048
Net	R0400	0	0	1.052	0	0	0	0	51.944
Expenses incurred	R0550	0	0	79	0	0	0	0	4.965
Administrative expenses									
Gross - Direct Business	R0610	0	0	5					290
Gross - Proportional reinsurance accepted	R0620	0	0	74					4.673
Gross - Non-proportional reinsurance accepted	R0630				0	0	0	0	0
Reinsurers' share	R0640	0	0	0	0	0	0	0	0
Net	R0700	0	0	79	0	0	0	0	4.963
Total expenses	R1300								4.965

## S.05.01 #3

Life				L	ife			Life reir	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	4.886	0	0	0	0	4.886
Reinsurers' share	R1420	0	0	0	185	0	0	0	0	185
Net	R1500	0	0	0	4.701	0	0	0	0	4.701
Premiums earned										
Gross	R1510	0	0	0	5.024	0	0	0	0	5.024
Reinsurers' share	R1520	0	0	0	185	0	0	0	0	185
Net	R1600	0	0	0	4.839	0	0	0	0	4.839
Claims incurred										
Gross	R1610	0	0	0	2.732	0	0	0	0	2.732
Reinsurers' share	R1620	0	0	0	0	0	0	0	0	0
Net	R1700	0	0	0	2.732	0	0	0	0	2.732
Expenses incurred	R1900	0	0	0	359	0	0	0	0	359
Administrative expenses										
Gross	R1910	0	0	0	359	0	0	0	0	359
Reinsurers' share	R1920	0	0	0	0	0	0	0	0	0
Net	R2000	0	0	0	359	0	0	0	0	359
Other expenses	R2510									0
Total expenses	R2600									359
Total amount of surrenders	R2700	0	0	0	0	0	0	0	0	

## S.12.01 #1

Life and Health SLT Technical Provisions

	Insurance with pro participation	Insurance with profit Index-kinked and unit-linked insurance participation						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	Other life 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	D		0			0	0		0 0	(	0 (	D
Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default Technical provisions calculated as a sum of BE and RM (Non-Replicable portfolio) Best Estimate	R0020	0	D		0			0	0	1	0 0	(	0 0	D
Gross Best Estimate	R0030	0	0	0		0		0	1.369		0 0	1.369	9 (	0 1
Total recoverables from reinsurance and SPV before the adjustment for expected losses due to counterparty default	R0040	0	0	0		0	, in the second s	0	0			1.000		
Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses	R0050	0	0	0		0		0	0					
Recoverables from SPV before adjustment for expected losses	R0060	0	0	0		0		0	0					
Recoverables from Finite Reinsurance before adjustment for expected losses	R0070	0	0	0		0	, in the second s	0	0					
Fotal Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default	R0080	0	0			0		0	0		n 0	(	n (	n
Best estimate minus recoverables from reinsurance and SPV - total	R0090	0	0			0		0	1.369		0			1
Risk margin	R0100	0	0		0	0		0	657			65	7 (	
Amount of the transitional on Technical Provisions	10100	0			0			0	007			001		0
TP calculated as a whole	R0110	0	n		0			0	0					
Best Estimate	R0120	0	0		Ŭ	0		ő	0					
Risk margin	R0120	0	0		0	0		0	0					
Technical provisions - total	R0200	0	0		0			0	2.026					3
Technical provisions - total Technical provisions minus recoverables from reinsurance and SPV - total	R0210	0	0		0			0	2.026			2.026		0 2
Best Estimate of products with a surrender option	R0220	0			0			0	2.020		0	2.020	5	4
	R0220	0	5		0			U	0					
Gross BE for Cash flow Cash out-flows														
	R0230				0			0						
Future guaranteed and discretionary benefits	R0230 R0240	0			0			0	0					
Future guaranteed benefits Future discretionary benefits	R0240 R0250	0							0					
	R0250 R0260	0							0					
Future expenses and other cash out-flows	R0200	U	0		0			0	0					
Cash in-flows Future premiums	R0270	0	n		0			0	0					
Other cash in-flows	R0280	0	0		0			0	0					
Percentage of gross Best Estimate calculated using approximations	R0290 0,00	0% 0,00009	r		0,0000%			0,0000%	0,0000%					
Surrender value	R0290 0,00	0,00007	0		0,0000%			0,000%	0,0000%					
Best estimate subject to transitional of the interest rate	R0300 R0310	0	n		0			0	0					
Technical provisions without transitional on interest rate	R0320	0	n		0			0	0					
Best estimate subject to volatility adjustment	R0330	0	n		0			0	0					-
Technical provisions without volatility adjustment and without others transitional measures	R0340	0	n		0			0	0					
Best estimate subject to matching adjustment	R0350	0	D		0			0	0					-
Technical provisions without matching adjustment and without all the others	R0360	0	n		0			0	0					
Total Expected profits included in future premiums (EPIFP)	R0370	-			0			0	0					

## S.12.01 #2

			Health insurance		Annuities stemming from non-life insurance contracts and relating to health insurance obligations		Total (Health similar I life insurance)
			Contracts without options and guarantees	Contracts with options and guarantees			
		C0160	C0170	C0180	C0190	C0200	C0210
TP calculated as a whole	R0010	00100		00100	0		
Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default Technical provisions calculated as a sum of BE and RM (Non-Replicable portfolio) Best Estimate	R0020	C			0	(	
Gross Best Estimate	R0030		0	0	0	(	)
Total recoverables from reinsurance and SPV before the adjustment for expected losses due to counterparty default	R0040		0				
Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses	R0050		0				
Recoverables from SPV before adjustment for expected losses	R0060		0				)
Recoverables from Finite Reinsurance before adjustment for expected losses	R0070		0				)
Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default	R0080		0	0	0	(	)
Best estimate minus recoverables from reinsurance and SPV - total	R0090		0			(	)
Risk margin	R0100	C			0	C	)
Amount of the transitional on Technical Provisions							
TP calculated as a whole	R0110	C	)		0	(	)
Best Estimate	R0120		0	0	0	(	)
Risk margin	R0130	C			0	(	
Technical provisions - total	R0200	C			0	(	
Technical provisions minus recoverables from reinsurance and SPV - total	R0210	C			0		
Best Estimate of products with a surrender option	R0220	C			0		
Gross BE for Cash flow Cash out-flows							
Future guaranteed and discretionary benefits	R0230	C	)		0		
Future guaranteed benefits	R0240						
Future discretionary benefits	R0250						
Future expenses and other cash out-flows	R0260	C			0	(	
Cash in-flows		1	1	1	1		1
Future premiums	R0270	0			0		
Other cash in-flows	R0280	C			0		
Percentage of gross Best Estimate calculated using approximations	R0290	0,0000%			0,0000%		
Surrender value	R0300	0			0		
Best estimate subject to transitional of the interest rate	R0310	0			0		
Technical provisions without transitional on interest rate	R0320				0		
Best estimate subject to volatility adjustment	R0330	C			0		
Technical provisions without volatility adjustment and without others transitional measures	R0340 R0350				0		
Best estimate subject to matching adjustment	R0350 R0360				0		
Technical provisions without matching adjustment and without all the others Total Expected profits included in future premiums (EPIFP)	R0360				0		

## S.17.01 #1

#### Non-Life Technical Provisions

		Direct business and accepted proportional reinsurance											
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	n 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	Legal expenses insurance	Assistance	Miscellaneous financia 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	0
Direct business	R0020		0	0	0	0	0	0	0	0	0	0	0
Accepted proportional reinsurance business	R0030		0	0	0	0	0	0	0	0	0	0	0
Accepted non-proportional reinsurance	R0040												
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	3.88	12	12	0	0	0	0 21	7	0	0	0	0
Gross - Direct Business	R0070		0	0	0	0	0	0	0	0	0	0	0
Gross - accepted proportional reinsurance business	R0080	3.88	12	12	0	0	0	0 21	7	0	0	0	0
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	864	0	0	0	0	0
Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses	R0110		0	0	0	0	0	864	0	0	0	0	0
Recoverables from SPV before adjustment for expected losses	R0120		0	0	0	0	0	0	0	0	0	0	0
Recoverables from Finite Reinsurance before adjustment for expected losses	R0130		0	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	R0140		0	0	0	0	0	864	0	0	0	0	0
Net Best Estimate of Premium Provisions	R0150	3.88	12	12	0	0	0 -	864 21	7	0	0	0	0
Claim provisions													
Gross - Total	R0160	7.73	0 7.1	66	0	0	0 75.	992 20.56	9 21.0	77	0	0	0 1.5
Gross - Direct Business	R0170		0	0	0	0	0	0	0 9	36	0	0	0
Gross - accepted proportional reinsurance business	R0180	7.73	0 7.2	66	0	0	0 75.	992 20.56	9 20.1	41	0	0	0 1.5
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 38.	629 3.82	3 5	57	0	0	0
Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses	R0210		0	0	0	0	0 38.	629 3.82	3 5	57	0	0	0
Recoverables from SPV before adjustment for expected losses	R0220		0	0	0	0	0	0	0	0	0	0	0
Recoverables from Finite Reinsurance before adjustment for expected losses	R0230		0	0	0	0	0	0	0	0	0	0	0
Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default	R0240		0	-	0	0	0 38.	629 3.82		57	0	0	0
Net Best Estimate of Claims Provisions	R0250	7.73	0 7.1	66	0	0	0 37.	363 16.74	5 20.5	20	0	0	0 1.58
Total Best estimate - gross	R0260	11.61			0	0	0 75.	992 20.78	6 21.0	77	0	0	0 1.6
Total Best estimate - net	R0270	11.61	1 7.3	77	0	0	0 36.	499 16.96	2 20.5	20	0	0	0 1.6
Risk margin	R0280	2.12	1.3	33	0	0	0 4.	017 1.86	7 2.2	59	0	0	0 18
Amount of the transitional on Technical Provisions													
TP calculated as a whole	R0290		0	0	-	-	0	0	0		0	0	0
Best Estimate	R0300		0	0			0	0	D	0	0	0	0
Risk margin	R0310		0	0	0	0	0	0	D	0	0	0	0
Technical provisions - total													
Technical provisions - total	R0320	13.73	9 8.0	11	0	0	0 80.	009 22.65	3 23.3	35	0	0	0 1.8
Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default	R0330		0		0	0		493 3.82		57	0	0	0
Technical provisions minus recoverables from reinsurance and SPV - total	R0340	13.73	19 8.6	11	0	0	0 40.	516 18.83	0 22.7	78	0	0	0 1.83

## S.17.01 #2

#### Non-Life Technical Provisions

Non-Life Technical Provisions		Accepted non-proportional reinsurance				
		Non-proportional health reinsurance		Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance	Total
		C0140	C0150	C0160	C0170	C0180
TP calculated as a whole	R0010	(	) (	) (	0 0	
Direct business	R0020					
Accepted proportional reinsurance business	R0030					
Accepted non-proportional reinsurance	R0040	(	) (	) (	0 0	
Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default Technical provisions calculated as a sum of BE and RM (Non-Replicable portfolio)	R0050	(	) (	) (	0 0	
Best Estimate						
Premium provisions						
Gross - Total	R0060		) (	) (	0 0	4.
Gross - Direct Business	R0070				0	
Gross - accepted proportional reinsurance business	R0080					4
Gross - accepted proportional reinsurance business	R0090		) (		0	
Total recoverables from reinsurance and SPV before the adjustment for expected losses due to counterparty default	R0100	(				
Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses	R0110	(			-	
Recoverables from SPV before adjustment for expected losses	R0120	(				
Recoverables from Finite Reinsurance before adjustment for expected losses	R0130	(				
otal Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default	R0140	(				
Net Best Estimate of Premium Provisions	R0150	(			-	
Claim provisions						
Gross - Total	R0160		) (	) (	0 0	134
Gross - Direct Business	R0170					
Gross - accepted proportional reinsurance business	R0180					133
Gross - accepted non-proportional reinsurance business	R0190	(	) (	) (	0	
Total recoverables from reinsurance and SPV before the adjustment for expected losses due to counterparty default	R0200	(	) (	) (	0 0	43
Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses	R0210	(	) (	) (	0 0	43
Recoverables from SPV before adjustment for expected losses	R0220	(	) (	) (	0 0	
Recoverables from Finite Reinsurance before adjustment for expected losses	R0230	(	) (	) (	0 0	
Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default	R0240	(	) (	) (	0 0	43
Net Best Estimate of Claims Provisions	R0250	(	) (	) (	0 0	91
Fotal Best estimate - gross	R0260	(	) (	) (	0 0	138
Fotal Best estimate - net	R0270	(	) (	) (	0 0	94
Risk margin	R0280	(	) (	) (	0 0	11.
Amount of the transitional on Technical Provisions		1	1	1		1
P calculated as a whole	R0290	(	) (	) (	0 0	
Best Estimate	R0300	(	) (	) (	0 0	
Risk margin	R0310	(	) (	) (	0 0	
Technical provisions - total					1	
Technical provisions - total	R0320	(	) (	) (	0 0	150
Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default	R0330	(	) (	) (	0 0	43
Technical provisions minus recoverables from reinsurance and SPV - total	R0340	(	) (	) (	0 0	106

## S.19.01

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

All lines of business							Developme	nt year							
Year		0	1	2	3	4	5	6	7	8	9	10	11	In current year	Sum of years (cumulative)
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0170	C0180
Prior	R0100													0	C
N-14	R0110	0	0	0	0	0	0	0	0	0	(	0	(	0 0	C
N-13	R0120	0	0	0	0	0	0	0	0	0	(	0 0	0	0 0	C
N-12	R0130	0	0	0	0	0	0	0	0	0	(	0	0	0 0	C
N-11	R0140	1.186	4.206	5.777	2.051	2.963	582	-443	176	155	(	0 0	0	0 0	16.652
N-10	R0150	30.397	4.326	2.807	2.874	-301	-868	44	49	635	14	48		48	40.024
N-9	R0160	2.764	6.773	7.193	403	14	27	9	261	0	104	•		104	17.549
N-8	R0170	4.546	13.356	4.312	5.505	3.929	251	2.361	1.294	152				152	35.706
N-7	R0180	3.849	21.046	3.825	116	1.742	-500	-3.585	487					487	26.981
N-6	R0190	621	3.181	1.996	932	436	28	10.541						10.541	17.735
N-5	R0200	27.828	57.353	3.874	10.370	4.845	493							493	104.762
N-4	R0210	163	1.081	4.309	3.696	1.941								1.941	11.190
N-3	R0220	7.611	31.768	14.983	19.585									19.585	73.947
N-2	R0230	19.754	17.559	9.740										9.740	47.052
N-1	R0240	13.249	15.552											15.552	28.801
N	R0250	27.063												27.063	27.063
Total														85.706	447.462

#### Gross undiscounted Best Estimate Claims Provisions

All lines of business							Developm	ient year						
Year		0	1	2	3	4	5	6	7	8	9	10	11	Year end (discounted data)
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0310	C0360
Prior	R0100													0
N-14	R0110	0	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 0
N-12	R0130	0	0	0	0	0	0	0	0	0	0	0		0 0
N-11	R0140	29.579	13.621	7.741	6.473	3.198	976	813	345	10	1	1		3 1
N-10	R0150	13.544	12.738	8.175	4.750	3.613	1.936	1.629	1.423	123	149	142		129
N-9	R0160	26.059	11.317	3.529	3.163	3.004	2.899	2.809	688	10.532	1.869			1.724
N-8	R0170	43.845	29.334	21.119	14.464	7.240	6.115	3.985	7.512	994				908
N-7	R0180	14.782	8.203	5.187	2.442	1.288	632	527	4.660					4.253
N-6	R0190	15.413	14.105	12.552	11.323	10.867	10.103	4.650						4.246
N-5	R0200	68.796	17.052	15.090	6.803	1.191	5.535							5.062
N-4	R0210	14.163	10.843	7.733	6.345	1.332								1.247
N-3	R0220	79.409	41.513	30.226	9.390									8.594
N-2	R0230	62.458	36.147	28.237										25.500
N-1	R0240	53.131	32.635											30.020
N	R0250	57.705												52.536
Total														134.221

## S.23.01

Own funds Basic own funds		Total	Tior 1 uprostriated	Tior 1 reatriated	Tior 2	Tier 3	Thousan
Basic own funds			Tier 1 — unrestricted	Tier 1 — restricted	Tier 2	Tier 3	
Drdinary share capital (gross of own shares)	R0010	C0010 89,987	C0020 89,987	C0030	C0040	0	C0050
, , ,	R0030	89,987	89,987			0	
Share premium account related to ordinary share capital	R0030	0	0			0	
nitial funds, members' contributions or the equivalent basic own - fund item for nutual and mutual-type undertakings	R0040	0	0			0	
Subordinated mutual member accounts	R0050	0			0	0	
Surplus funds	R0070	0	0				
Preference shares	R0090	0			0	0	
Share premium account related to preference shares	R0110	0			0	0	
Reconciliation reserve	R0130	243,297	243,297				
Subordinated liabilities	R0140	0			0	0	
An amount equal to the value of net deferred tax assets	R0160	3,073					3,07
Other items approved by supervisory authority as basic own funds not specified above	R0180	0	0		0	0	
				1			
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							
Dwn funds from the financial statements that should not be represented by the econciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220	0					
Deductions		Total	Tier 1 — unrestricted	Tier 1 — restricted	Tier 2	Tier 3	
Deductions for participations in financial and credit institutions	R0230	0	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	336,357	333,284		0	0	3,07
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 own fund item for mutual and mutual - type undertakings, callable on demand	R0310	0				0	
Unpaid and uncalled preference shares callable on demand A legally binding commitment to subscribe and pay for subordinated liabilities on	R0320 R0330	0				0	
demand		-				ů	
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340	0				0	
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350	0				0	
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360	0				0	
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370	0				0	
Other ancillary own funds	R0390	0				0	
Total ancillary own funds	R0400	0				0	
Total available own funds to meet the SCR	R0500	336,357	333,284		0	0	3,07
Total available own funds to meet the SCK	R0510	333,284	333,284		0	0	5,07
	10010	333,284	333,284		0		
Total eligible own funds to meet the SCR	R0540	336,357	333,284		0	0	3,07
Total eligible own funds to meet the SCK	R0550	338,357	333,284		0		3,07
I GAL SINGLAW I TURUS TO INCEL UIC MOR	110330	333,284	333,284		<u>ч</u>	0	
Solvency Capital Requirement	R0580	91,757					
Minimum capital requirement	R0600	22,939					
	R0620	366.573%					
Ratio of Eligible own funds to SCR							
Ratio of Eligible own funds to SCR Ratio of Eligible own funds to MCR	R0640						
-		1,452.895%					
Ratio of Eligible own funds to SCR Ratio of Eligible own funds to MCR Reconciliation reserve							

		C0060
Excess of assets over liabilities	R0700	336,357
Own shares (held directly and indirectly)	R0710	0
Foreseeable dividends, distributions and charges	R0720	0
Other basic own fund items	R0730	93,060
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	0
Reconciliation reserve	R0760	243,297
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

## S.25.01

Solvency Capital Requirement - for undertakings on Standard Formula		Thousand		
Article 11	2 Z0010	2: Regular reporting		
Solvency Capital Requirement calculated using standard formula		Net solvency capital requirement	requirement	Allocation from adjustments due to RFF and Matching adjustments portfolios
		C0030	C0040	C0050
Market risk	R0010	5,237	5,237	C
Counterparty default risk	R0020	44,049	44,049	C
Life underwriting risk	R0030	6,055	6,055	C
Health underwriting risk	R0040	31,908	31,908	C
Non-life underwriting risk	R0050	76,749	76,749	C
Diversification	R0060	-47,199	-47,199	
Intangible asset risk	R0070	0	0	
Basic Solvency Capital Requirement	R0100	116,800	116,800	

Calculation of Solvency Capital Requirement		C0100	
Adjustment due to RFF/MAP nSCR aggregation	R0120	0	
Operational risk	R0130	5,055	
Loss-absorbing capacity of technical provisions	R0140	C	
Loss-absorbing capacity of deferred taxes	R0150	-30,098	
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	91,757	
Capital add-ons already set	R0210	0	
of which, capital add-ons already set - Article 37 (1) Type a	R0211	C	
of which, capital add-ons already set - Article 37 (1) Type b	R0212	C	
of which, capital add-ons already set - Article 37 (1) Type c	R0213	C	
of which, capital add-ons already set - Article 37 (1) Type d	R0214	C	
Solvency Capital Requirement	R0220	91,757	
Other information on SCR			
Capital requirement for duration-based equity risk sub-module	R0400	0	
Total amount of Notional Solvency Capital Requirements for remaining part	R0410	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	0	

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	3,073	0	
DTA carry forward	R0610	3,073	0	
DTA due to deductible temporary differences	R0620	0	0	
DTL	R0630	0	0	
LAC DT	R0640			-30,098
LAC DT justified by reversion of deferred tax liabilities	R0650			-30,098
LAC DT justified by reference to probable future taxable profit	R0660			0
LAC DT justified by carry back, current year	R0670			0
LAC DT justified by carry back, future years	R0680			0
Maximum LAC DT	R0690			0

## S.28.01

Minimum Capital Requirement - Only life or only non-life insuranc	Thousand		
Linear formula component for non-life insurance and reinsurance obligations		MCR components	
		C0010	
MCR Non-Life Result	R0010	20,484	]
		Net (of reinsurance/SPV)	Net (of reinsurance) written
		best estimate and TP calculated as a whole	premiums in the last 12 months
		C0020	C0030
Medical expense insurance	R0020	11,611	28,71
Income protection insurance	R0030	7,277	3,46
Workers' compensation insurance	R0040	0	
Motor vehicle liability insurance	R0050	0	
Other motor insurance	R0060	0	
Marine, aviation and transport insurance	R0070	36,499	44,68
Fire and other damage to property insurance	R0080	16,962	18,01
General liability insurance	R0090	20,520	13,84
Credit and suretyship insurance	R0100	0	
Legal expenses insurance	R0110	0	
Assistance	R0120	0	
Miscellaneous financial loss	R0130	1,651	1,19
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 incurnes and releasurence altirations		MCD components	
Linear formula component for life insurance and reinsurance obligations		MCR components C0040	
MCR Life Result	R0200	29	
		Net (of reinsurance/SPV)	Net (of reinsurance/SPV)
		best estimate and TP calculated as a whole	total capital at risk
		C0050	C0060
Obligations with profit participation - guaranteed benefits	R0210	0	
Obligations with profit participation - future discretionary benefits	R0220	0	
Index-linked and unit-linked insurance obligations	R0230	0	
Other life (re)insurance and health obligations	R0240	1,369	
Capital at risk for all life (re)insurance obligations	R0250		
Overall MCR calculation		MCR components	
		C0070	
Linear MCR	R0300	20,513	
SCR	R0310	91,757	
MCR cap	R0320	41,291	
MCR floor	R0330	22,939	
Combined MCR	R0340	22,939	ł
Absolute floor of the MCR	R0350	4,089	{
Minimum capital requirement	R0400	22,939	4