Gan Direct®

Solvency and Financial Condition Report (SFCR)

gandirect.com

Reference Date: 31/12/2024

Submission Date: 07/04/2025

Confidential

Gan Direct Insurance Ltd

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Tables and Figures

1 Executive Summary

1.1 Overview

GAN Direct Insurance Ltd, (hereafter also referred to as “Gan”, “Gan Direct” or “the Company”), commenced operations in the Cyprus Insurance Industry in May 1994 mainly specialised in the direct delivery of uncomplicated insurance products.

This document, namely the Solvency and Financial Condition Report (SFCR), has been prepared in accordance with the Commission Delegated Regulation (EU) 2015/35 of October 2014, supplementing the Directive 2009/138/EC of the European Parliament and of the Council. This is a publicly available document that provides information regarding the Company’s performance for the year ending on 31 December 2024.

1.2 Business and Performance

Gan Direct operates in Cyprus with over 90% of its business being Motor. The Company’s underwriting performance is presented below:

The table below sets out the analysis of the underwriting results of the Company for the year ended 31 December 2024 compared with last year’s results:

€ 000	2024	2023
Insurance Revenue	13,465,511	12,865,611
Incurred Claims	-10,620,437	-8,520,684
Attributable Expenses	-1,027,833	-1,069,118
Insurance Service Result	**1,817,241**	**3,275,809**

€ 000	2024	2023
Reinsurance Premium	-1,066,272	-1,098,594
Amounts Recoverable from Reinsurance	1,896,011	644,590
Reinsurance Result	**829,739**	**-454,004**

Table 1-1: Underwriting Performance

1.3 System of Governance

The Company is committed to implementing a sound governance framework through which objectives are set and the means of attaining these objectives and monitoring performance is determined.

In general, the BoD considers all important management and policy matters in relation to the Company which include, amongst other things, setting the Company’s strategic aims, ensuring that the necessary financial and human resources are in place for the Company to meet its objectives and review management performance. The Board also sets the Company’s values and standards and ensures that its obligations to the shareholders and others are understood and met.

1.4 Risk Profile

As at the reference date the Company is exposed mainly to the Insurance, Market, Credit, Liquidity and Operational risk. The table below summarizes the capital requirement as at the end of 2024:

Type of Risk	31/12/2024 €000s
Interest rate risk	*93*
Equity risk	*210*
Property risk	*1,725*
Spread risk	*0*
Concentration risk	*617*
Currency risk	*0*
Counter - Cyclical Premium	*0*
Diversification Market Risk	*-612*
Market Risk	**2,033**
Counterparty risk	**1,159**
Health Non-SLT Underwriting	**50**
Non-life Underwriting	**4,110**
Life Underwriting	**0**
Diversification BSCR	*-1,645*
BSCR	**5,708**
Operational Risk	**404**
Tax adjustment	**-254**
SCR Total	**5,856**
Available Capital	**9,345**
SCR (%)	**160%**

Table 1-2 SCR calculations

1.5 Valuation for Solvency purposes

As at 31 December 2024, the Company had the following liabilities:

Liabilities	Solvency II Value €000s	Statutory Accounts Value €000s
Gross technical provisions – non-life (excluding health)	12,522	13,573
TP calculated as a whole (Best estimate + Risk margin)	12,522	
Best Estimate	11,899	
Risk margin	622	
Gross technical provisions - health (similar to non-life)	18	42
TP calculated as a whole (Best estimate + Risk margin)	18	
Best Estimate	18	
Risk margin	0	
(Re)insurance accounts payable	171	171
Insurance & Intermediaries Payables	142	142
Deferred tax liabilities	579	623
Amounts owed to credit institutions	10	10
Payables (trade, not insurance)	366	366
Any other liabilities (excluding subordinated liabilities), not elsewhere shown	0	0
Total Liabilities	13,807	14,500

Table 1-3: Total Liabilities

1.6 Capital Management

As at 31/12/2024, the Company's own funds amounted to €9,34m and are mainly comprised of ordinary share capital and reconciliation reserve (approx. €7.8m). The total Own Funds represent 234% of the MCR and 160% of the SCR.

Basic Own Funds	Total €000s	Tier 1 – unrestricted €000s
Basic Own Funds		
Ordinary share capital (gross of own shares)	1,505	1,505
Surplus funds	0	0
Reconciliation reserve	7,840	7,840
Subordinated liabilities	0	
Total basic own funds after deductions	**9,345**	**9,345**
Ancillary own funds		
Available and eligible own funds		
Total available own funds to meet the SCR	9,364	9,364
Total available own funds to meet the MCR	9,364	9,364
Total eligible own funds to meet the SCR	9,364	9,364
Total eligible own funds to meet the MCR	9,364	9,364
SCR	**5,858**	
MCR	**4,000**	
Ratio of Eligible own funds to SCR	**160%**	
Ratio of Eligible own funds to MCR	**234%**	

Table 1-4: Own Funds

2 Business and Performance

2.1 Business

2.1.1 Company Information

GAN Direct Insurance Ltd was incorporated 2000. The emphasis is placed upon the direct delivery of uncomplicated insurance products, which offer speed, convenience and value. The Company offers products that exceed customer's expectations and can be customized based on their individual needs.

Since its establishment GAN Direct has gone from strength to strength by using the latest automated technology and providing high standards of service. The Company's strategy is underpinned by controlled growth through strict underwriting principles and not simply for volume or market share. GAN Direct has worked hard to build a superior proposition for insurance to consumers through competitive pricing and by continuously improving their products and services. Today, the Company offers competitive rates and 24-hour Assistance, and online services.

The Company has a personal and flexible approach to Customer needs by providing a tailor-made service to meet the individual needs of its Customers. The Company's aim is to put the Customer at the center of all it does It continues to seek and develop innovative solutions that meet the needs of its customers now and in the future.

The address of the Company's registered office and of its external auditors are shown below:

Registered Office	**External Auditors**
Makariou III 220	Baker Tilly Klitou & Partners Ltd
Stelmaria Court	Corner C. Hatzopoulou & 30
3030 Limassol, Cyprus	Griva Digheni Avenue,
Tel: +357 25 885 885	1066 Nicosia, Cyprus
Fax: +357 25 822 668	
E-mail: info@gandirect.com	

2.1.2 Material Lines of Business by Operating Segment and Solvency II and geographical areas

The Company operates in the Non-Life field and offers a wide range of insurance products in the General Business. The main business lines' distribution is as follows:

- Motor Vehicle liability insurance
- Other Motor Insurance
- Fire and Other Damage to property
- Income protection Insurance
- General Liability Insurance

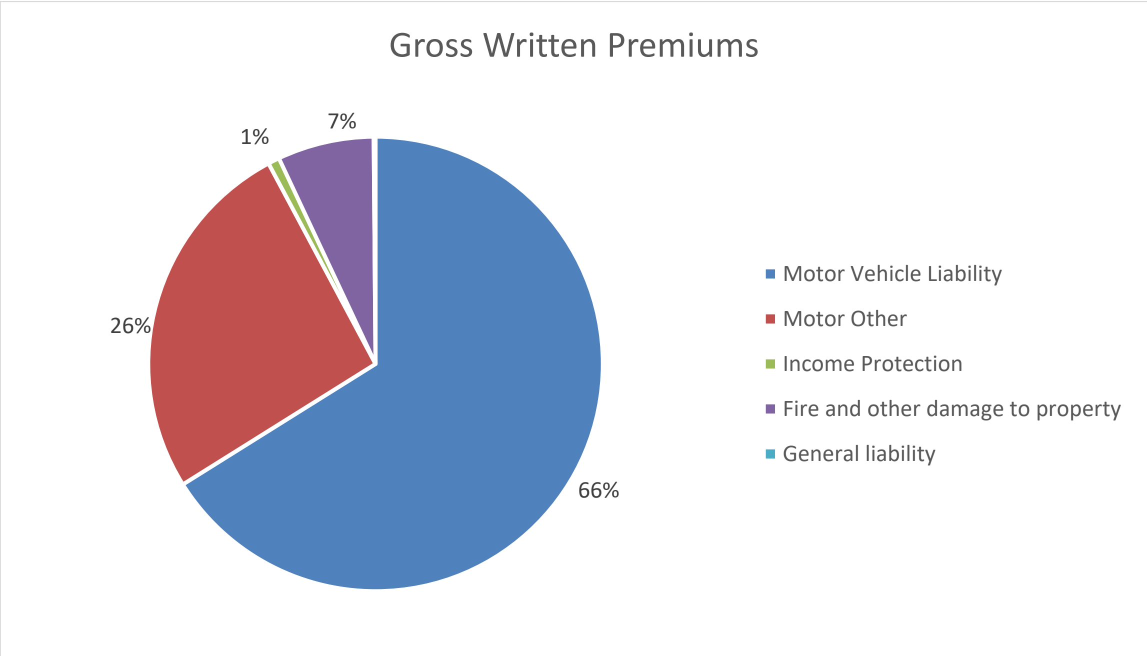

Figure 1: Distribution of Premiums

2.1.3 Significant Events during the reporting period and up to the date of the report

As at 31 December 2024, the SCR amounted to EUR 5,86m and the MCR to EUR 4m. The Company's solvency ratio therefore was 160%. The Company complied with the MCR and SCR at all times during the financial year 2024 and is expected to continue doing so despite any adverse impact from the ongoing environmental social and governance (ESG) changes, driven by the war in Ukraine, on the global economic development, financial markets and the insurance industry which was affected by market inflation effects in general.

The Directors consider that at this stage there is no material effect on the sustainability and ethical considerations of the Company resulting from ESG in the published information as at 31 December 2024 and do not expect any significant impact on the 160% year end solvency coverage. Under Solvency II, the Company is required to hold sufficient capital to cover its SCR in order to enable it to absorb significant losses and the payments to policyholders and other parties will continue to be made when they fall due.

The Company in its 2024 ORSA has performed the following stress tests:

- The Company will experience an increase in interest rates over the forecasted period due to the economic environment, which in turn leads to a decrease in the market value of the bonds
- The Company will experience one catastrophe event of €5.5m magnitude in 2025
- The Company will experience a decline in written premiums across all lines of business, attributed to the rise in the cost of living prompted by the prevailing economic conditions, influencing clients' behavior towards selecting more affordable products or switching providers. Consequently, there is an anticipated 10% reduction in written premiums for the Company
- The Company will experience an increase in expense ratio from all lines of business over the forecasted period, due to macroeconomic factors like inflation resulting to an increase in claims provision and premium provision as well. This will increase the expense ratio of the Company by 15%.

The tests showed that the Company is able to meet its 100% SCR ratio even under a possible increase in expense ratio. More details can be found in section 4.7.1 of the report.

2.1.4 Distribution Channels and Customer Service

The Company only writes business in Cyprus and remains focused on the individual customer business as it writes its business by maintaining and expanding a direct portfolio.

The Company specializes in selling insurance products directly to customers by telephone and the internet. The Company also maintains offices in Nicosia, Limassol, Larnaca, Paphos and Famagusta for sales, customer service and support.

The Company is very well known in Cyprus for its distinctive logo, an orange telephone, regularly used in its marketing and for the tune of the free telephone line for customer service and support of 800 5 10 15.

This business model of direct sales means that there are no intermediaries and therefore no commissions are paid. This saving on the commission expense is then passed onto the customers in terms of lower premiums.

2.2 Underwriting Performance

The table below sets out the analysis of the underwriting results of the Company for the year ended 31 December 2024 in comparison with the results of the previous reporting period.

€ 000	2024	2023
Insurance Revenue	13,465,511	12,865,611
Incurred Claims	-10,620,437	-8,520,684
Attributable Expenses	-1,027,833	-1,069,118
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Reinsurance Reuslt	**829,739**	**-454,004**

Table 2-1: Underwriting Performance

Insurance Revenue in 2024 was €13,5m compared to €12.9m in 2023. Net claims incurred in 2024 were €11.7m compared to €9.6 in 2023. Attributable Expenses in 2024 were €1m.

2.2.1 Underwriting performance at an aggregate level

The overall underwriting performance of the Company during 2024 was heavily impacted by development of historical large claims. The Company is continuously trying to improve its results through better and quicker handling and settlement of claims as well as cost reductions where possible.

2.2.2 Underwriting performance by Solvency II line of business

The overall underwriting performance of the Company during 2024 was heavily impacted by development of historical large claims. The Company is continuously trying to improve its results through better and quicker handling and settlement of claims as well as cost reductions through effective procurement.

2.3 Investment Performance

2.3.1 Income and expenses by asset class

The table below sets out the investment portfolio of the Company by asset class.

Investment Portfolio before Expected Credit Losses	2024	2023	Development
Asset Class	€ 000	€ 000	%
Cash and Deposits	634	447	42%
Equity	440	530	-17%
Government Bonds	7,081	9,078	-22%
Plant & Equipment	245	320	-24%
Property	8,625	8,408	3%
Total	8,400	10,375	-19%

Table 2-2: Investments Performance

The investment income decreased to €215k in 2024 from €312k in 2023.

2.3.2 Investments in Securitization

The Company does not hold any investments in securitization instruments.

2.3.3 Performance of other Activities

The Company does not carry out any other activities.

2.4 Any other disclosures

There is no other information to report.

3 System of Governance

3.1 General Information on the System of Governance

Corporate governance is essential in reinforcing the Board of Directors' oversight role and its independence in making decisions and in the production of transparent and timely information. The Company is committed to implementing a sound governance framework through which objectives are set and the means of attaining these objectives and monitoring performance is determined. The Company uses the "Three line of defense" model.

The company has also established and incorporated into its own governance system the following functions:

- Risk Function
- Compliance Function
- Internal Audit Function
- Actuarial Function

The organizational structure of the Company is presented in the diagram below:

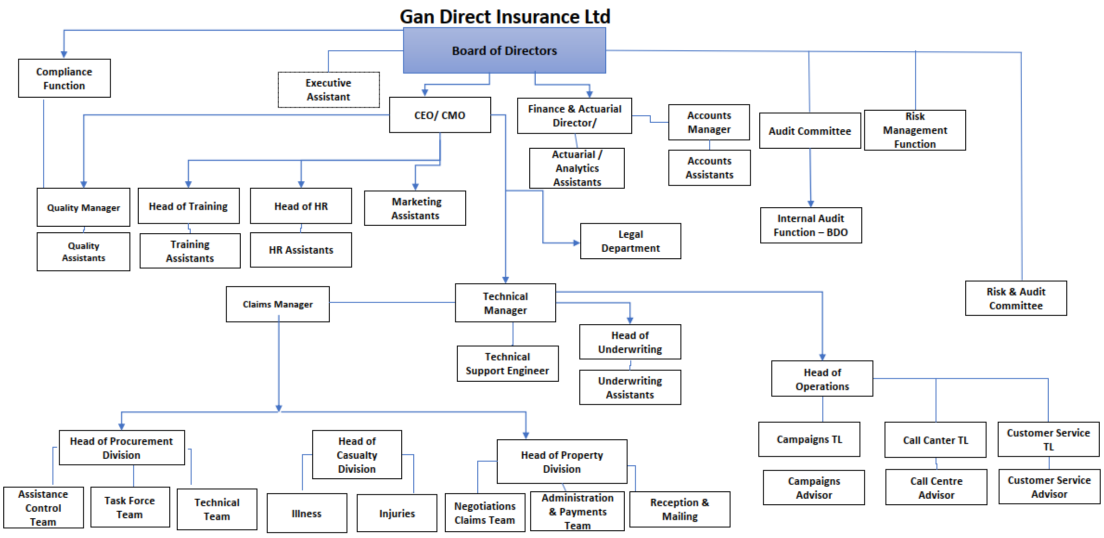

Figure 2: Organizational Structure

3.1.1 Board of Directors

Gan Direct is managed by its Board of Directors ("BoD"), supported by an Audit committee, Risk & Reserving Committee, Nominations & Remuneration Committee and an Investment committee. The board of the Company is of sufficient size expertise to oversee adequately the operations of the Company.

The Company's BoD is made up of both executive and non-Executive directors, who govern the organization by establishing board policies and objectives.

In general, the BoD considers all important management and policy matters in relation to the Company which include, amongst other things, setting the Company's strategic aims, ensuring that the necessary financial and human resources are in place for the Company to meet its objectives and review management performance. The Board also sets the Company's values and standards and ensures that its obligations to the shareholders and others, are understood and met.

The BoD and the Chief Executive Officer are responsible for determining corporate objectives and risk strategies and defining the Company's risk framework, establishing a suitable internal control system and of approving the Company's annual budgets.

3.1.2 Composition of the Board

The BoD of the Company consists of 2 Executive and 2 Non-Executive Directors. The Board of the Company is of sufficient size and has considerable expertise in the Insurance Industry in order to oversee adequately the operations of the Company.

3.1.3 Board Committees / Executive Committees

For its more effective operation the BoD has established the following Committees with oversight responsibility over key functions.

Audit Committee

The Audit Committee meets quarterly. The committee's objectives is to assist the Board of Directors and has the responsibility for three of the four key functions, namely Risk Management, Compliance and Internal Audit. The Committee also oversees the External Audit function. The Committee comprises of two independent non-executive Directors.

Risk & Reserving Management Committee

The Risk and Reserving Committee meets formally at least four times a year. The Risk and Reserving Committee defines and reviews the operational risk management framework, the liquidity risk framework, the underwriting strategy, Underwriting & Reserving risks, the concentration risk framework, the reputational risk appetite, the investment risk, the asset liability risk and the Strategy risk of the Company, taking into account the financial environment and macroeconomic factors, the Company's solvency position and the material risks that the Company is exposed to. The Committee is made up by three Directors including, the Secretary and the Chairperson, or their delegate.

Remuneration & Nomination Committee

The Remuneration & Nomination Committee meets at least two times a year. The Committee as an advisory Committee to the BoD, assists with the formulation of the Company's overall remuneration and nominations policies for defining remuneration practices as well as senior appointment and promotions within the Company. In addition the Committee ensures that these policies promote an effective system of internal control and makes recommendations to the BoD for improvements. The Committee consists of all five Directors of the Board.

Investment Committee

The Investment Committee meets at least four times a year. The Committee as an advisory Committee to the BoD assists with the formulation of the Company's overall investment strategy and policy, oversees and reports on the implementation of the investment strategy, and recommends any material changes to such strategy to the BoD. The Committee consists of three Directors and the Chairperson.

3.1.4 Key Functions, Roles and Responsibilities (risk-management, compliance, internal audit, actuarial)

The Company's key Control Functions are partially undertaken through the Company's resources with support of external consultants.

Risk Function

The risk management function is responsible for facilitating the implementation of the Risk Management System of the Company and achieving the efficient and effective management of risk in accordance with the risk appetite of the Company.

Duties included under this function are in relation to the preparation of underwriting and reserving exercises, operational risk management, reinsurance, quantification of risk and capital allocation, and compliance with regulatory regime.

Compliance Function

The compliance function is responsible for ensuring compliance with external regulations and internal policies.

The duties of the Compliance Function include the establishment and application of suitable procedures for the purpose of achieving a timely and on-going compliance of the Company with the existing legal and regulatory framework. The activities and responsibilities of the Function are governed by the Compliance Manual, which is approved by the BoD and reviewed annually.

Internal Audit Function

The Internal Audit Function examines and reviews holistically key activities within selected risk areas of the Company and provides recommendations for improvement regarding the proper design and application of control to safeguard against potential loss emerging from probable inefficiencies within those selected areas.

The internal audit evaluates and assesses the adequacy, appropriateness and effectiveness of all the Company's internal control system and offer operations and provides suggestions for possible improvements. Its activities are designed to provide advice to management in improving the internal control system and monitors the implementation of management's remedial actions.

The Internal Audit function is outsourced to KPMG (Cyprus) Ltd.

Actuarial Function

The Actuarial Function advises the Risk Committee and the Board of Directors on the following:

- Underwriting policy
- Reinsurance arrangements of the company and their adequacy
- Valuation of technical provisions
- Capital adequacy
- Risk Management System

The main duties of the Actuarial Function include:

- Coordination of the calculation of technical provisions
- Assess the quality and sufficiency of the data used for the calculation of technical provisions
- Compare best estimates against experience
- Risk modelling of capital requirement calculations
- Stress testing and sensitivity analysis

The Actuarial Function is outsourced to KPMG (Cyprus) Ltd.

3.1.5 Material changes during the period

No material changes during the period.

3.1.6 Proposed changes

There are no further material changes planned for the system of governance.

3.1.7 Remuneration/Compensation Policy (Principles, Performance criteria, HR, Compensation, Risk and Compensation plans)

The Company provides a fixed remuneration package, and a range of benefits is offered to employees, including 13th salary, medical insurance and paid holiday arrangements, contributions to social insurance fund.

The Company also pays a discretionary Easter Bonus in the form of a 14th salary up to one month's gross salary. The amount paid, is based on a percentage scale depending on the number of years employed by the Company. Employees with over five years' continuous employment receive a full 14th month salary.

Remuneration of non-executive directors considers their attendance to Board of Directors and committee meeting and receive a fee.

The executive directors are on a fixed contract.

3.2 Fit and Proper Requirements

Skills knowledge and expertise requirements

In accordance with Solvency II Directive the Company has specified fit and proper requirements for persons who effectively run the business or hold other key functions.

Basically, the persons above are the members of the Board of Directors and holders of the governance functions namely the risk management, compliance, internal audit and actuarial functions.

There are, however, different requirements for the members of the Board and different requirements for holders of other key functions.

Members of the Board of Directors

To ensure that the members of the Board are fit for the position there are requirements which include a level of expertise and experience in the following areas:

- Insurance and financial markets
- Business strategy and business model
- Solvency II requirements for the system of governance
- Financial and actuarial analyses, and
- Regulatory frameworks and requirements

3.2.1 Policy

The Company applies the principle of collective professional skills, qualifications and experience. This means that not every member of the Board will meet all the above requirements but that the

Board collectively meets the above requirements. This knowledge and experience is required to have a sound and prudent management.

To ensure that the members of the Board are proper persons, the Company has the following requirements:

- No criminal record
- No breaches of legislation or regulations
- Good personal conduct, reputation, financial integrity and honesty

3.2.2 Processes for assessing fitness and propriety

The Company has a policy to ensure that persons appointed to relevant roles are "Fit and Proper". As part of that policy, various checks and procedures are listed which may be carried out before appointing an individual to a key position or to a position involving oversight of key functions. Those checks include:

- the completion by the applicant of a "fit and proper" Declaration Form;
- undertaking of qualification checks to determine the authenticity of the person's qualifications;
- undertaking checks with any regulatory body tasked with administering any legislation;
- undertaking of checks to confirm the work experience that the person claims to have;
- undertaking of checks via the internet for any adverse information relating to the person

A person will only be deemed fit and proper if it can be shown that:

- it can reasonably be concluded that the person possesses the competence, character, diligence, honesty, integrity and judgement to properly perform their duties;
- the person is disqualified from acting in their position or performing their duties in terms of any legislation

Holders of key function

Requirements to ensure that holders of key functions are fit persons include:

- appropriate level of qualifications necessary for the function
- technical knowledge and experience required for the function

For the key functions that are also requirements to ensure that these individuals are proper persons which include:

- no criminal offences
- no breaches of legislation
- good personal conduct, reputation, financial integrity and honesty

3.3 Risk Management System including the Own Risk and Solvency Assessment

The risk management system is an integral party of the governance system. Its purpose is to identify, evaluate, manage and report the risks that Gan Direct is exposed to.

3.3.1 Risk Management framework

The risk management process provides information on risk situations and helps the management to place controls to ensure that the strategic objectives are achieved.

This process addresses all the risks relevant to Gan Direct and which include the following risks:

- Insurance (undertaking) risk
- Market risk
- Concentration risk
- Counterparty default risk
- Credit risk
- Liquidity risk
- Operational risk
- Reputational risk
- Strategic risk
- Emerging risk
- Inflation risk

For all the significant risks identified above, the risk management process at Gan Direct identifies, measures, manages, monitors and reports.

3.3.2 Strategy and objectives

Risk Identification

Risk identification is the first stage in the risk management process during which the Company's management identify and record all material risk exposures that arise in the course of business. The process is performed annually using a Risk Register, which includes all the risks inherent to the Company's functions and operations that could potentially have an adverse effect on the Company's performance. The Risk Register is updated with new risks, as they arise.

Measurement and assessment

After the risks have been identified there is a series of qualitative and/or quantitative assessments of these risks to estimate the probability of occurrence and the potential impact. In measuring and assessment of the risks we use methods such as:

- Sensitivity analysis
- Scenario analysis
- Expert judgments

Materiality has been defined in terms of the maximum potential loss occurring form an event taking place.

The Company uses a range of materiality thresholds base on the impact or risks on Solvency, earnings, liquidity and reputation. During the risk mapping exercise, the materiality of each risk within the risk universe was assessed against the materiality thresholds.

Managing – Risk mitigation and transfer

The resulting material risks to the Company are managed by using a number of strategies:

- **Mitigate**
  Risk mitigation involves the mitigation of the risk likelihood and/or impact
- **Avoid**
  Risks avoidance is the elimination of activities that cause the risk
- **Transfer**
  Risk transference is transferring the impact of the risk to a third party
- **Accept**
  Risk acceptance means accepting that a risk might have an impact, and no mitigating measures are taken

The risk management strategies are selected in such a way to ensure that the risks remain within the risk appetite tolerance limits set by the Company.

Monitoring and Reporting

The risk monitoring and reporting are required to ensure they reflect changes to the environment and conditions. The means that it is possible that risk management strategies may have to be adapted in accordance with risk appetite tolerance levels and limits.

Risk Management Implementation and Integration

The way the risk management system including the risk management function are implemented and integrated into the organisation structure and decision-making process of the Company is set below.

The Company has a risk appetite statement approved by both the audit and risk & reserving committees, and the Board of Directors. The risk appetite statement is supported by a risk indicators and tolerance document which seeks to sets out in practical terms how the Company measures whether its performance remains within the approved appetite for risk. The risk indicators and tolerance document is used to generate key risk indicators which are reported twice a year and are reviewed by both the audit and risk committee and the Board of Directors.

The risk register is maintained by the risk function and is subject to an annual review at a minimum. The risk register tabulates all the perceived risks to the business as well as any emerging risks. Those risks are assessed as to their impact on the business both in terms of percentage likelihood and in financial terms, where applicable (not all risks have financial consequences).

Once reviewed, the updated risk register is presented to the audit and risk & reserving committees for review, and to the Board of Directors. The audit and risk & reserving committees and the Board of Directors consider the adequacy of the controls in place and the financial impact of the risk occurring.

The audit and risk & reserving committees have the responsibility for overseeing the implementation of any additional controls that might be deemed necessary. In this way, the governance bodies charged with managing the company's exposure to risk are kept updated and informed as to the risks faced by the business, and through the key risk indicators, the current level of exposure to each risk.

3.3.3 Own Risk and Solvency Assessment

The EC Directive in Article 45 requires that insurers, as part of their risk management system, to perform an Own Risk and Solvency Assessment (ORSA). The assessment requires the Company to properly determine its overall solvency needs to cover both short and long-term risks.

The risk based approach requires amongst other things, that the Company hold an amount of capital that is commensurate with the risks to which it may be exposed, and therefore the ORSA assists the Company in better understanding of its risks, solvency needs and own funds held.

Gan Direct produces an "ORSA" at least once in each calendar year. Additional ORSAs may be produced in response to material changes to risks faced by the Company.

The Company uses ORSA as a management tool to enhance risk awareness in its culture and decisions making processes, forming an integral part of the overall business strategy and assists in having a practical understanding of the risks it has.

The ORSA process includes an assessment of capital requirements over the next 12 months. The level of economic capital required is also delivered using stress scenarios whereby the capital available is recalculated under the different risk scenarios.

The process of producing the ORSA is a cyclical one. The inputs include:

- Board's policies
- Board's strategy for the business

- Output from the standard model Pillar 1 process
- Actuarial function output
- The Company's Enterprise Risk Management system

The ORSA is then produced by the management in conjunction with the actuarial and risk management function. The ORSA is presented to the audit and risk committee for comment and review; and if approved, to the Board of Directors for their consideration. The result of the Board's consideration forms the basis for the future strategy of the business, which forms the basis for the following year's ORSA.

3.4 Internal Control System

The Company's Internal Control System (ICS) is the aggregate of control mechanisms and procedures which covers, on an ongoing basis, every single activity of the Company and contributes towards the Company's efficient and sound operation.

The Company applies five lines of defense in dealing with its Internal Controls. They are:

- The Control Environment, whereby the culture of internal control is set from the Board of Directors, down to employees. The Company promotes the importance of appropriate internal controls by ensuring that all personnel are aware of their role in the internal control system
- Risk Assessment, whereby all risks are assessed and complied into a Risk Register reviewed twice a year
- Control Activities – those controls integrated in the routine operations of the Company.
- Information & Communication – whereby the results of the Control activities are communicated across the company, and
- Monitor Activities – whereby the system of internal control is reviewed by independent staff that have no operational responsibilities

Gan Directs' compliance mission is to:

- Protect the Company's reputation and manage compliance risk.
- Show its commitment to establishing high ethical standards in conducting its business.
- Ensure compliance with regularly bodies and authorities - there is continuous monitoring of trends and changes in regulations in order to proactively manage reputational and compliance risks.

The Compliance function engages in a number of methods and activities in order to identify control and suggest measures to mitigate compliance risk.

3.5 Outsourcing Arrangements

To manage the risks related to outsourcing, Gan Direct has a policy to safeguard its business operations.

General requirements for outsourcing

The outsourcing policy sets out the procedures for the assessment of outsourcing as outlined below:

- Risk assessment is required for important activities, whereby concentration of risk, competition risk and possible conflicts of interest are examined.
- Confidentiality, quality of service and continuity are crucial to ensure the service provider is competent and reliable.
- Compliance with law and regulations is also essential element of the assessment.

When choosing a supplier, consideration is given as to how the risks identified can be mitigated. Furthermore, the procedures for the selection of the supplier, consider matters such as the supplier's experience, reputation, its organization and employees. In the section process, it is ensured that the supplier has the ability and capacity to be able to perform the task and can fulfil the requirement of any applicable legislation.

Where important or critical activities are to be outsourced there must be in place a written agreement to ensure the interests of the Company are protected and comply with any legal and regulatory requirements.

All important or critical outsourcing requires the approval of the Chief Executive Officer. Gan Direct remains fully responsible for the activities outsourced.

Requirements for the outsourcing of critical or key functions or activities

In addition to the above, for outsourcing an important or key function or activity, Gan Direct has also set the following requirements:

Due diligence

A due diligence exercise must be carried out to ensure that:

- Service provider can perform the outsourced function or activity
- Service provider has the technical ability required
- The employees of the service provider that will be involved in providing the outsourced function have sufficient qualifications
- Service provider has the authorisations required by law to provide the required function or activity

Written authorization to the supervisory authority

Gan Direct is obliged to notify the supervisory authority in a timely manner prior to the outsourcing of critical or key functions.

Outsourcing Key Functions

For the outsourcing of a key function, the Company must also fulfil the following requirements:

- Designation of the responsible person within Gan Direct that will have overall responsibility for the outsourced key function, who is fit and proper and possesses sufficient knowledge and experience regarding the outsourced key function to be able to challenge the performance and result of the service provided.
- Assessment of the person responsible for the outsourced key function and any relevant persons at the service provider.
- Notification to the supervisory authority of the responsible person.
- Monitor and review to be able to assess if the service provider delivers according to the written agreement.

Gan Direct currently outsources its Internal Audit function and Actuarial function to KPMG Cyprus Ltd.

Outsourced Function or Activity	Jurisdiction of service provider
Internal Audit Function	Cyprus
Actuarial Function	Cyprus
Accident and Road Assistance	Cyprus
Networking and Security	Cyprus
Loss Estimators/ Adjusters	Cyprus
Servers and Systems	UK & Germany
Medical Assistance Abroad	Greece

Table 3-1 Outsourced activities / functions

3.6 Any other disclosures

Quality Management System

Gan Direct maintains a Quality Management System and is accredited with the international standard of ISO since May 2002.

A Quality Management System (QMS) is a set of policies and procedures required for planning and execution (production/development/service) in the core business area of an organization (i.e. areas that can impact the organization’s ability to meet customer requirements).

The Management and the staff of the Company are fully committed to work consistently, having the customer satisfaction as their top priority, to offer quality non-life insurance products that will meet customer expectations when the need arises, to minimize customer complaints, with the aim towards improving the effectiveness of the Quality Management System.

The Quality Management System implemented within the Company is reviewed on a systematic basis:

- to ensure continual improvement on customer satisfaction and service quality
- to safeguard that all the processes needed for non-life insurance cover is in accordance with the relevant requirements
- to make sure that the Company's Quality Management continues to be operative so as to control the requirements of the ISO 9001 Standard
- and that the customer requirements are fully met in a competitive way

The renewal of the ISO certificate is subjected to an annual external audit by the British Standards Institute (BSI).

3.7 Adequacy of system of governance

Overall, the Company's Management System is considered appropriate and effective given the nature, size and complexity of the risks inherent in the business. The main risks inherent in the Company's business are discussed further in section 4 of this Report. The Company will however continue with the strengthening of its governance system in response to new business demands and regulatory requirements, as mentioned in section 3.1.6 above.

4 Risk Profile

According to the Solvency directive, the Company is required to maintain enough capital to cover its Underwriting, Market, Credit and Operational risks. The Solvency Capital Requirement (SCR) is the amount of capital that the Company has to hold in order to be able to meet its obligations to both its policyholder and shareholders over the next year with a confidence level of 99,5%.

For the purposes of estimating risk exposure, the Pillar 1 methodology (Standard formula) under Solvency II Directive is used to quantify the key risks and assign capital. Based on the results of the Pillar 1 exercise as at 31 December 2024, the Company has allocated capital to various risks and has achieved a Solvency Coverage Ratio of 160%.

The table below summarizes the capital requirement as at the valuation date:

Type of Risk	31/12/2024 €000s
Interest rate risk	*93*
Equity risk	*210*
Property risk	*1,725*
Spread risk	*0*
Concentration risk	*617*
Currency risk	*0*
Counter - Cyclical Premium	*0*
Diversification Market Risk	*-612*
Market Risk	**2,033**
Counterparty risk	**1,159**
Health Non-SLT Underwriting	**50**
Non-life Underwriting	**4,110**
Life Underwriting	**0**
Diversification BSCR	*-1,645*
BSCR	**5,707**
Operational Risk	**404**
Tax adjustment	**-254**
SCR Total	**5,856**
Available Capital	**9,345**
SCR (%)	**160%**

Table 4-1: Solvency Capital Requirement

As can be seen clearly from the table above the biggest risk drivers for Gan Direct are Non-Life underwriting risk and Market risk.

The detailed composition of these two risk modules is analyzed further down in this report.

4.1 Insurance (Underwriting) Risk

The Company is exposed to various insurance risks that arise from its underwriting activities. The main types of insurance risks that the Company is exposed to are non-life risk and health risk.

A standardized approach in line with the EIOPA specifications was used by the Company for calculating the Solvency Capital Requirement for non-life and health underwriting risks.

Based on the results of the Pillar 1 exercise for Year 2024, the total diversified Non-Life underwriting risk is €4,11m out of which €3,99m derives from Premium and Reserve Risk, €0,48m from Lapse Risk, €0,33m from Catastrophic Risk (along with an allowance for diversification effect), while the total diversified Health underwriting risk is €0,05m.

Underwriting Risk	Capital Requirement 31/12/2024
	€000s
Health Risk	
Premium & Reserves Risk	8
Health Catastrophe	47
Diversification effect	-5
Total Health Diversified	**50**
Non-Life Risk	
Premium & Reserves Risk	3,986
Lapse Risk	482
Catastrophe Risk	333
Diversification effect	-691
Total Non-Life Risk Diversified	**4,110**

Table 4-2:Underwriting risk – Diversified Capital Requirement

Premium risk is the risk resulting from fluctuations in the timing, frequency and severity of insured events. It relates to policies to be written (including renewals) during the period, and to unexpired risk on existing contracts. Gan's exposure to premium risk mainly comes from its dependency on Motor Third Party, Motor Other Damages and to a smaller extent to Fire insurance, which both together contribute by more than 99% to the Company's premium income (as indicated in the figure below).

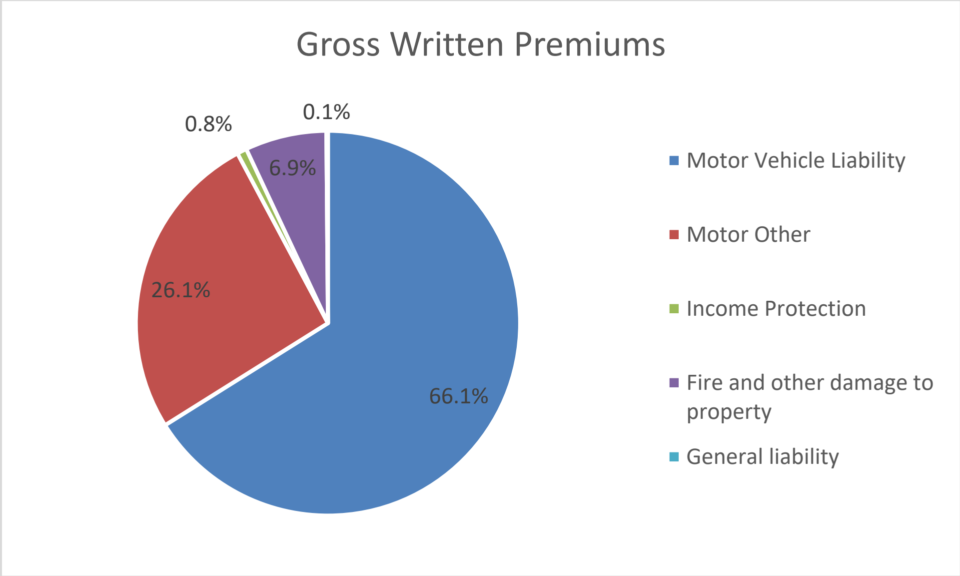

Figure 3: Total Gross Written Premiums

Dependency to motor insurance also increases the risk of low profitability due to the Claims Ratios observed with motor insurance.

Reserve risk is the risk that results in fluctuation in the timing and amount of claims settlements. Gan Direct Insurance, as all other insurance undertakings, is also exposed to Reserve risk mainly due to the nature of the industry, which increases the risk for the correct quantification and development of claims.

The Company's exposure to Catastrophe Risk stems from extreme or irregular events that are not sufficiently captured by the capital requirements for premium and reserve risk. The total diversified gross catastrophe risk consists of Natural Catastrophes and Man-made Catastrophes. In Cyprus the only peril with regards to natural catastrophes is earthquake.

4.1.1 Insurance Risk Mitigation Techniques

The main risk mitigation the Company employs is reinsurance. There are a number and a mix of reinsurance arrangements to ensure adequate protection for the Company.

For example, the Company transfers its exposure to major events involving damage to building and contents so that the potential loss to the Company is limited to its retention.

To mitigate its exposure to Insurance Risk to less material levels, the Company consults with external professionals who review the reserves and claims provisions, taking into consideration the Company's risk profile, policies and procedures.

In addition, underwriting procedures including measurement and pricing of insurance policies is performed based on strict policies and guidelines, and after considering the Company's strategy and other macroeconomic factors, including the level of economic activity and competition in the industry.

4.2 Market Risk

Market Risk is the risk of potential losses due to adverse movements in financial market variables. Exposure to market risk is measured by the impact of movements in financial variables such as property prices, equity prices and interest rates.

With regards to Market Risk, the Company is mainly exposed to Concentration Risk, Equity, Property, Interest rate. The total diversified Market Risk Capital Requirement, as per the results of the Pillar 1 for Year 2024 is approximately €2,03m while the non-diversified Capital Requirement of the Market risk's components is detailed below:

Market Risk	Capital Requirement 31/12/2024
	€000s
Interest rate risk	93
Equity risk	210
Property risk	1,725
Spread risk	0
Concentration risk	617
Currency risk	0
Counter - Cyclical Premium	0
Diversification effect	-612
Total Market Diversified	**2,033**

Table 4-3: Market Risk – Diversified Capital Requirement

Concentration Risk

Concentration Risk may arise with respect to investments in geographical area, economic sector, or individual investments in a geographical area, economic sector, or individual investments or due to a concentration of business written within a geographical area, of a policy type or of underlying risks covered.

The total Concentration Risk Capital Requirement for Gan Insurance as at 31 of December 2024, is approximately €0,62m.

The main impact of concentration risk is high due to the high concentration of assets of the Company's Head Office in Limassol.

Property Risk

Property Risk relates to the sensitivity of the values of assets, liabilities, and financial instruments to changes in the level or in the volatility of market prices of real estate. The calculation of the capital requirement for the property risk equates to the loss of basic own funds with a direct 25% fall in the values of land and buildings.

Property risk arises from the Company's exposure to properties in Nicosia, Limassol, Larnaca and Paralimni. A big part of this property risk relates to the Company's Head Office in Limassol.

Company's assets are highly concentrated into property either for own use or investments, which are valued at approximately €8,9m in 2024.

The total Property Risk Capital Requirement for Gan Insurance as at 31 of December 2024, is approximately €1,73m.

Interest rate Risk

Interest rate Risk calculations exist for all assets and liabilities for which the net asset value is sensitive to changes in the term structure of interest rates or interest rate volatility.

The total Interest rate Risk Capital Requirement for Gan Insurance as at 31 of December 2024, is approximately €0,093m.

Spread Risk

Spread Risk relates to the sensitivity of the values of assets, liabilities and financial instruments to changes in the level or in volatility of credit spreads over the risk-free interest rate term structure.

In 2024 the Company has used the term deposits to acquire government bonds which are low in spread risk, thus Gan Insurance was not exposed to Spread Risk for year-end 2024.

Equity Risk

Equity Risk relates to the sensitivity of the values of assets, liabilities, and financial instruments to changes in the level or in the volatility of market prices of equities.

The total Equity Risk Capital Requirement for Gan Insurance as at 31 of December 2024, is approximately €0,21m.

Currency Risk

Currency risk relates to the sensitivity of the value of assets and liabilities to changes in the level or volatility of exchange rates.

The Company is not exposed to Currency Risk as at 31 of December 2024.

4.2.1 Market Risk Mitigation Techniques

Transfer of risk

For property risk to be lower, the Company's management is considering restructuring options which include scenarios to transfer properties ownership to different entity and reduce the direct Company's exposure to property risk.

Risk mitigation from deferred tax

The use of deferred tax is a general risk mitigation technique that can be applied in certain cases.

When deferred taxes are used as a risk mitigation technique, it is assumed that in the event that an extreme scenario occurs which reduces the value of the relevant asset, part of the impact can be absorbed, because the existing and recognized deferred tax liability will no longer be due following the occurrence of the scenario. This reduces the overall influence of the scenario.

In the case of Gan Direct the overall impact of the scenario regarding properties could be reduced by approximately 20% which is the rate for Capital Gains Tax on Properties already provided for in the Financial statements.

Diversification - Counterparties

As mentioned above Gan Direct is exposed to concentration risk due to the high concentration of assets resulted by the Company's Head Office in Limassol.

Measures were taken by management to reduce both concentration risk and counterparty risk by opening bank accounts outside Cyprus (elsewhere in Europe) with banks with a good credit rating.

Despite these management measures the Company is still exposed to concentration risk as shown by the Pillar 1 results for 2024.

This matter is constantly under review by the management.

4.2.2 Application of the ''Prudent Person Principle'' to Investments.

Gan Direct has an Investment Management Policy which sets out the framework in which it may set investment mandates and manage its asset-liability management activities. This includes:

- Defining the investment objectives and benchmarks;
- Documenting and communicating the investment philosophy;
- Provide a framework for the approval, and monitoring the performance of investment decisions;
- Specifying the requirements for asset-liability management; and
- Ensuring compliance with all regulatory requirements.

The Company's major investments consists of land and building and government bonds placed with different banks both in Cyprus and elsewhere in Europe. These two asset classes represent appox. 92% of the Company's total assets. The Company invests in the following asset classes:

- Cash and deposits
- Equity
- Property
- Plant & Equipment
- Government bonds

The Company's investments in Land and Buildings was done long before Solvency II came into effect. The Company as at 2024 invested in government bonds with total market value of €7.1m. The characteristics of the purchased bonds are following the rules and the regulations of the investment Policy of the Company. Specifically, the bonds valued under Euro currency and all belong to the European Union. Finally, the credit ratings of the bonds comply with the Company's investment Policy.

The world economy is still fragile with a lot of uncertainties and therefore the Board that takes all the ultimate decisions about investments is very risk averse under the present economic situation in Cyprus, Europe and the world economy in general.

Starting from 2022, the Company has changed its investment strategy and has decided to invest in European Government bonds. This decision demonstrates that the Company places emphasis on capital preservation since the Governments bonds are considered to be risk-free and also grow its capital.

This is however continuously monitored and modified where necessary.

4.3 Credit Risk

Credit risk is the risk of loss, or of adverse change in the financial situation, resulting from fluctuations in the credit standing of issuers of securities, counterparties and any debtors to which insurance and reinsurance undertakings are exposed to. Counterparty risk includes the exposures with the Company's:

- Reinsurance Providers
- Other debtors (cash deposits with banks and other balances)

The Company uses the Direct Channel of sales and does NOT allow any credit and therefore does not have any exposure to amounts due from policyholders or intermediaries.

The Company's exposure to credit risk with regards to counterparty default risk has also been quantified using the Pillar 1 methodology which is based on Delegated Regulation (EU) 2015/35 released on the 10th October 2014. For the year 2024, based on the results of the Pillar 1, the total diversified Counterparty Default risk under Solvency II is estimated to be €0,67m.

Counterparty Default Risk	Capital Requirement 31/12/2024
	€000s
Counterparty default risk of type 1 exposures	415
Counterparty default risk of type 2 exposures	815
Diversification effect	-71
Total Counterparty Default Risk	**1,159**

Table 4-4: Counterpart Default Risk

The Company's exposure to counterparty risk for the year 2024 comes mainly from its reinsurance recoverables and cash deposits.

Counterparty exposures are usually monitored taking into consideration the credit rating of each counterparty.

4.3.1 Credit Risks Mitigation Techniques

Overall the Company has adopted the following policies and controls set by management, to mitigate its exposure to credit counterparty risk, and ensure compliance with the Company's risk appetite:

- Engagement only with reinsurers with minimum credit rating of A
- In the Company's agreements with reinsurers, there is a build-in clause which states that in the event where the reinsurance providers credit rating deteriorates, the Company has the option to immediately replace them
- Changes in credit rating or solvency ratio of reinsurance and other counterparties are monitored regularly and the list of approved counterparties is updated accordingly.

4.4 Liquidity Risk

Liquidity risk is defined as the risk for profits and capital that derives from the Company's inability to meet its obligations, when these become due, or it meets them at non-reasonable cost. Gan Direct is averse to liquidity risk and holds sufficient cash balances to pay at least 6 months claims and expenses at any one time.

In fact, it is worth noting that the Company maintains significant position of fixed income assets and cash equivalents and therefore considers its liquidity risk exposure as non-material.

Factors such as a financial crisis or energy crisis, as a result of a pandemic, war, or high inflation, that affects policyholders' behavior can result in lack of liquidity. In such cases, customers may proceed with the surrender of their policies, resulting in large cash outflows for the Company. In order to address the above issues, Gan Direct retains liquid assets and reinsurance treaties covering among others catastrophic risks. Therefore, the Company does not expect material impact of liquidity risk materialization.

The liquidity position of the Company is closely monitored along with the correlation between assets and liabilities and their matching on cash flow and duration level.

4.4.1 Liquidity Risk Mitigation Techniques

To control and maintain its exposure to Liquidity risk at its current low levels, the Company takes the following mitigating steps:

- It maintains a substantial pool of liquid assets that is used to meet short term liquidity demands of up to 6 months, as well as a buffer for unexpected cash demands
- Its liquid assets consist primarily of high liquidity instruments in the form of Cash and Term Deposits according to management's approval
- Lastly its liquid assets are regularly reviewed and it is ensured that the value of the liquid asset buffer is stable under normal and stressed market conditions

4.5 Operational Risk

Operational risk is the risk of loss caused by inadequacies or failure in internal processes, employees or systems, or by external events. Operational risk does not include reputational or strategic risk.

Gan Direct assesses operational risks in accordance with the standard Solvency II formula. The capital requirement for operational risk as at 31 December 2024 was €0,40m and represents appox. 7% of the standard formula SCR.

Gan Direct is exposed to a high number of operational risks. These risks have been catalogued in the Company Risk Register.

The following risks have been judged to be the material ones:

- Litigation risk, particularly in relation to settlement of claims.
- IT risks (including Cyber risk)
- Business interruption risk
- Claims and external fraud
- Employee risk (staff shortage, etc.)
- Claims and internal fraud

4.5.1 Operational Risk Mitigation Techniques

To control and maintain its exposure to operational risk at its current low levels, the Company takes the following mitigating steps:

- Recording of transactions takes place electronically. Premiums are being collected at policy inception and renewal.
- Staff with actuarial responsibilities perform the reserving exercise in cooperation with external consultants who review the outcome of the exercise and challenge the assumptions and methodologies used, in order to ensure that the Company is not under-reserved.
- The Company's management ensures that the Company is in compliance with all the regulatory requirements and acquires external consulting services where necessary.
- Business Continuity Plan in place and reviewed regularly along with a direct control internally of all external assistance providers.
- The 4-eye principle is adopted. The Company has procedures in place to achieve segregation of duties and eliminate the risk of internal fraud.
- Closed circuit security systems and procedures in place to reduce the possibility of breach of physical security.
- No corporate actions are taken without the approval of the Board, and the required feasibility and suitability studies. All corporate actions are also regulated by the Group's policies.
- Tax and Accounting processes take place internally from the Company's Finance department which consists of competent and professionally qualified staff. External consultants also audit the Company's financial statements and are in place to trace errors, if any.
- Procedures for record-keeping are in place and application of the guidelines is mandatory by all branches.
- System-driven authorisation is required for any unusual or high risk.
- The Information Technology department of the Company is in charge for the smooth and reliable operation of the Company's systems. Controls include regular information backups, strict authorization procedures, anti-virus software used, data protection.
- Disaster Recovery site in different location. Business Continuity Plan in place and reviewed regularly. Also, the company has insurance against such events.

4.6 Other Material Risks

A part of the regular ORSA process, the overall risk profile and associated solvency capital needs are assessed against Gan Directs' actual solvency position, taking into account identified risks that are not incorporated into the standard formula. The following rules have been recognised by Gan Direct as being potentially material:

- Regulatory risk
- Strategic risk
- Reputational risk
- Legal environment risk

4.7 Risk Sensitivities

A stress is an adverse development of an individual risk factor or event. It demonstrates the effect on corresponding key performance indicators and gives an insight of the Company's exposure or vulnerabilities based on these exceptional adverse but possible developments.

In the insurance sector, stress testing is used to demonstrate the effect of such rare events on key financial performance indicators such as the solvency ratio, earnings, liquidity, etc.

4.7.1 Stress Tests and Sensitivities

The following stress scenarios were performed as part of the Company's 2023 Own Solvency Risk Assessment (ORSA):

- **Scenario 1** assumes that the Company will experience an increase in interest rates over the forecasted period due to the economic environment, which in turn leads to a decrease in the market value of the bonds and therefore the Solvency II own funds. On the other hand, the Market risk module will increase. As a result, under this stress scenario the Solvency Coverage decreased from an average of 169.2% to an average of 163.9% for the forecasted period.
- **Scenario 2** assumes that the Company will experience one catastrophe event of €5,5m magnitude in 2025. This will cause damages on buildings and contents hence more claims will occur on the Property line of business. In addition to the impact on claims, this scenario assumes that following the catastrophe event, the cost of reinsurance will increase by 3%. As a result of the above impacts, the best estimate liabilities will be increased leading to the reduction of the Company's Solvency Coverage Ratio for the forecasted period from an average of 169.2% to an average of 159.9%.
- **Scenario 3** assumes that the company will encounter a decline in written premiums across all lines of business. This is attributed to the rise in the cost of living prompted by the prevailing economic conditions, influencing clients' behavior towards selecting more affordable products or switching providers. Consequently, there is an anticipated 10% reduction in written premiums for the company. This decline in written premiums will impact the bonds held by the company, as the reduction in premiums written will result in decreased investments. Furthermore, the decrease in premiums written will also lead to

a reduction in the best estimate liabilities, affecting both claim and premium provisions. Consequently, the Company's assets and liabilities will decrease. Additionally, due to the decrease in best estimate liabilities, the capital requirements will also decrease. These movements collectively contribute to a positive impact on the Solvency Coverage. Specifically, the Solvency Coverage is expected to decrease slightly from an average of 169.2% to an average of 165.8% for the forecasted period.

- **Scenario 4** assumes that the Company will experience an increase in expense ratio from all lines of business over the forecasted period, due to macroeconomic factors like inflation resulting to an increase in claims provision and premium provision as well. The above will increase the expense ratio of the Company by 15%. The Company's Solvency Coverage Ratio is expected to decrease slightly from an average of 169.2% to an average of 169.0% for the forecasted period.

The results of the Stress Testing exercise are presented in the below table:

Solvency II Capital Coverage (%)						
	2024		**2025**		**2026**	
	SCR(%)	**MCR(%)**	**SCR(%)**	**MCR(%)**	**SCR(%)**	**MCR(%)**
Base Scenario	159.0%	231.5%	166.0%	264.4%	182.8%	302.3%
Scenario 1	159.0%	231.5%	157.8%	251.3%	174.9%	289.1%
Scenario 2	159.0%	231.5%	151.0%	242.9%	169.9%	281.0%
Scenario 3	158.8%	231.2%	164.7%	256.2%	174.0%	291.3%
Scenario 4	159.0%	231.5%	165.8%	264.1%	182.4%	301.6%

Table 4-5: Stress Testing Results

The Company's Management has assessed the results of the stress tests and their impact on the Company's performance and Capital Adequacy and in response to that assessment, it has considered a number of measures to prevent any potential deviations of its target Solvency and business targets as well as to ensure that it will be able to meet the MCR under the basic scenario at all times.

The Company under all stress scenarios, maintains a satisfactory SCR and MCR coverage ratio.

5 Regulatory Balance Sheet (Valuation for Solvency purposes)

5.1 Assets

All assets and liabilities, listed in the table below are valued in accordance with Solvency II Principle and are compared to theirs IFRS 17 valuation. Assets and liabilities are valued on the assumption that the Company will pursue the business as a going concern. No changes in the valuation methods occurred during the year under review.

The Company does not have any off-balance sheet assets or liabilities.

The table below summarizes the assets as at 31 December 2024. The material difference between the financial statements and the Solvency II balance sheet relates to the bases which are used to value the assets. For the financial statements, the reinsurance receivables relating to the reinsurer share of unearned premiums are valued at fair value whereas for the Solvency II balance sheet, the premium provision is used resulting from the reinsurer share in the premium provisions. Also, the goodwill and the other intangible assets are not recognised as an asset in the Solvency II valuation rules.

The table below shows the Assets Valuations - IFRS 17 vs Solvency II:

Assets	Solvency II Value €000s	Statutory Accounts Value €000s
Goodwill	0	0
Other intangible assets	0	0
Property, plant & equipment held for own use	8,870	8,870
Investments (other than assets held for unit-linked funds)	7,215	7,347
Reinsurance recoverables	602	1,045
Insurance recoverables (excluding Intermediaries)	429	429
Deferred acquisition costs	0	430
Receivables (trade, not insurance)	5,403	5,403
Tax refundable	0	0
Cash and cash equivalents	634	634
Any other assets, not elsewhere shown	0	0
Total Assets	23,152	24,158

Table 5-1: Assets

5.1.1 Bases, methods and main assumptions used for valuation for Solvency II

Intangible assets

Intangible assets are not recognised in Solvency II. Therefore, there is a difference between IFRS17 and Solvency II of €0,1k.

Property, plant and equipment held for own use

Properties for own use are initially measured at cost, is then subsequently carried at fair value representing open market value as determined annually by independent qualified valuers.

Plant and equipment is valued at cost less accumulated depreciation which provides a close approximation of fair value.

There are no differences between IFRS 17 valuation and Solvency II valuation.

Investment Properties

Investment properties are valued at fair value determined annually by external valuers.

Long term Deposits

Deposits other than cash equivalents are valued at fair value.

Insurance and other receivables

The Company does not allow credit to Policyholders and does not use any intermediaries.

The value of insurance and other receivables is the same in both the IFRS 17 and the Solvency II Balance Sheet.

Cash and Cash Equivalents

Cash and cash equivalents include cash in hand and deposits in bank current accounts.

Deferred Acquisition Costs

There is no concept of Deferred Acquisition Costs in Solvency II. Therefore, there is a difference between IFRS 17 and Solvency II of €430k.

Reinsurance recoverable

Reinsurance recoverable are the difference between the gross and net provisions under Solvency II, these are valued on a best estimate basis.

This difference in the valuation methods means there is a difference between IFRS 17 and Solvency II of €440k.

5.2 Technical Provisions

5.2.1 Summary of Technical Provisions

Valuation of technical provisions under Solvency II are the sum of the best estimate and the risk margin.

The table below illustrates the premium and claim provision for the calculation of the Gross Best Estimate as well as the Risk margin for the calculation of the Gross technical provision:

Gross Technical Provisions	Claims Provisions €000s	Premium Provisions €000s	Gross Best Estimate €000s	Risk Margin €000s	Gross Technical Provisions €000s
Motor Vehicle Liability	6,116	2,668	8,784	513	9,297
Motor Other	1,179	1,385	2,565	103	2,668
Income Protection	3	15	18	0	18
Fire and other damage to property	323	223	546	7	552
General liability	0	5	5	0	5
Total	7,621	4,296	11,917	623	12,539

Table 5-2: Technical Provisions

5.2.2 Valuation Basis, Methods and Main Assumptions

The Company is calculating the Technical Provisions using Actuarial techniques and full cash flow models as per Solvency II requirements. Specifically:

- Actuarial Chain Ladder methods have been incorporated in calculating the Incurred But Not Reported and Incurred but Not Enough reported Claim amounts for all lines of business.
- An Unallocated Loss Adjustment Expense calculation has been carried out in order to reserve for the expense that will be incurred until the outstanding and IBNR claims are paid out.
- Premium Provisions have been calculated on a line of business level. For each line of business the cash inflows and cash outflows have been calculated and then discounted using the EIOPA provided risk free rates.

5.2.3 Comparison between the Solvency II and the IFRS 17 valuation

The difference between the IFRS17 and the Solvency II technical provisions is driven by the difference between “Risk Adjustment” and “Risk Margin” which are mentioned in each standard respectively.

The table below summarizes the Technical Provisions under Solvency II and IFRS17.

Liabilities	Solvency II Value €000s	Statutory Accounts Value €000s
Gross technical provisions – non-life (excluding health)	12,522	13,573
TP calculated as a whole (Best estimate + Risk margin)	12,522	
Best Estimate	11,899	
Risk margin	622	
Gross technical provisions - health (similar to non-life)	18	42
TP calculated as a whole (Best estimate + Risk margin)	18	
Best Estimate	18	
Risk margin	0	
Total Liabilities	13,810	14,876

Table 5-3: Technical Provisions under Solvency II and IFRS

5.2.4 Transitional measures: Matching Adjustment

Not applicable.

5.2.5 Transitional Measures: Volatility Adjustment

Not applicable.

5.2.6 Transitional measures: Risk Free Interest Rate

Not applicable.

5.2.7 Transitional measures: Impact

Not applicable.

5.2.8 Reinsurance Recoveries

The table below indicates the reinsurance recoverables by line of business. These represent the difference between the gross and net provisions.

Reinsurance Recoverables	Claims Provisions €000s	Premium Provisions €000s
Motor Vehicle Liability	233	0
Motor Other	0	0
Income Protection	2	4
Fire and other damage to property	246	117
General liability	0	0
Total	481	121

Table 5-4: Reinsurance Recoverables

5.2.9 Risk Margin

The risk margin (in accordance with the Solvency II framework) is designed to ensure that the value of technical provisions is equivalent to the amount that a third undertaking would be expected to require in order to take over and meet the Company's insurance obligations.

The risk margin is calculated by determining the cost of providing an amount of eligible own funds equal to the SCR necessary to support the Company's reinsurance obligations over their lifetime thereof. This rate, called the cost-of-capital, is prescribed at 6%.

The method used is method 2 as specified in Guideline 61 of the "EIOPA guidelines on the valuation of technical provisions". More specifically, the ratio of the best estimate at each future year to the best estimate at the valuation date was used to derive the SCR for each future year.

The risk margin is allocated to the individual lines of business using the simplification outlined in Guideline 63 of the EIOPA guidelines on the valuation of technical provisions.

5.2.10 Level of uncertainty and the value of technical provisions

The level of uncertainty basically relates as to how future actual experience will differ from the best estimate assumptions used to calculate the technical provision.

The calculation of the claims provisions is inherently uncertain with respect to the amount and timing of future cash flows and requires the use of judgement.

Therefore, the Company's actual liability for losses may therefore be subject to positive or negative deviations relative to the initially estimated claims provisions.

5.3 Other Liabilities

5.3.1 Summary of the valuation of Other Liabilities

As at 31 December 2024, the Company held the following liabilities:

Liabilities	Solvency II Value €000s	Statutory Accounts Value €000s
Gross technical provisions – non-life (excluding health)	12,522	13,573
TP calculated as a whole (Best estimate + Risk margin)	12,522	
Best Estimate	11,899	
Risk margin	622	
Gross technical provisions - health (similar to non-life)	18	42
TP calculated as a whole (Best estimate + Risk margin)	18	
Best Estimate	18	
Risk margin	0	
(Re)insurance accounts payable	171	171
Insurance & Intermediaries Payables	142	142
Deferred tax liabilities	579	623
Amounts owed to credit institutions	10	10
Payables (trade, not insurance)	366	366
Any other liabilities (excluding subordinated liabilities), not elsewhere shown	0	0
Total Liabilities	13,807	14,500

Table 5-5: Liabilities

5.4 Alternative Valuation Method

The Company does not use any alternative methods for valuation.

5.5 Any other disclosures

None.

6 Capital Management – Annex – Quantitative Reporting Templates (QRTs)

6.1 Own Funds

The objective of managing the Company's own funds is to ensure that there are sufficient own funds to meet the capital requirement under Solvency II at all times with a prudent buffer to ensure its financial capacity under more difficult economic conditions.

The overall solvency of the Company is subject to a quarterly review of the coverage of the capital requirements in Pillar 1.

As at 31/12/2024, the Company's own funds amounted to €9,34m and are mainly comprised of ordinary share capital and reconciliation reserve (approx. €7.8m). The total Own Funds represent 234% of the MCR and 160% of the SCR.

Basic Own Funds	Total €000s	Tier 1 – unrestricted €000s
Basic Own Funds		
Ordinary share capital (gross of own shares)	1,505	1,505
Surplus funds	0	0
Reconciliation reserve	7,840	7,840
Subordinated liabilities	0	
Total basic own funds after deductions	**9,345**	**9,345**
Ancillary own funds		
Available and eligible own funds		
Total available own funds to meet the SCR	9,345	9,345
Total available own funds to meet the MCR	9,345	9,345
Total eligible own funds to meet the SCR	9,345	9,345
Total eligible own funds to meet the MCR	9,345	9,345
SCR	**5,856**	
MCR	**4,000**	
Ratio of Eligible own funds to SCR	**160%**	
Ratio of Eligible own funds to MCR	**234%**	

Table 6-1: Own Funds

The Company's Own Funds are not subject to transitional arrangements and as the table above indicates, the Company has no ancillary Own Funds. Furthermore, no deductions are applied to the Own Funds and no material restrictions affect their transferability and availability.

Furthermore, as part of the ORSA process, the Company prepares a three-year business projection which will also result in a three-year projection of the capital requirements. This helps the Board of Directors in ensuring that there are available own funds in the line with its business plan and objectives.

6.2 Solvency Capital Requirements and Minimum Capital Requirement

The Company's Solvency Capital Requirement is €5,86m and its Minimum Capital Requirement is €4m.

Key Risk	Risk Type		Solvency Capital Requirements €000s
Non Life Underwriting Risk	**Total Non Life Underwriting Risk**		**4,110**
		Non-Life premium and reserve risk	3,986
		Non Life Lapse Risk	482
		Non-Life CAT Risk	333
		Diversification effects	-691
Market Risk	**Total Market Risk**		**2,033**
		Interest rate risk	93
		Equity risk	210
		Property risk	1,725
		Spread risk	0
		Concentration risk	617
		Currency risk	0
		Counter - Cyclical Premium	0
		Diversification effects	-612
Counterparty Default Risk	**Counterparty Default Risk**		**1,161**
		Counterparty default risk of type 1 exposures	415
		Counterparty default risk of type 2 exposures	815
		Diversification effects	-71
Health Underwriting Risk	**Health Underwriting Risk**		**50**
		Non-SLT Health (similar to non-life technique)	8
		Health CAT	47
		Diversification effects	-5
Basic Solvency Capital Requirement (BSCR) pre diversification			7,351
Diversification Effect			-1,645
Basic Solvency Capital Requirement (BSCR)			**5,707**
Operational Risk			**404**
Adjustment for Deferred taxes			-254
Capital at Risk	SCR		**5,856**
	MCR		**4,000**

Table 6-2: SCR and MCR

For the calculation of the SCR and the MCR the Company uses EIOPA's Solvency II Standard Formula.

6.3 Differences between the Standard Formula and any Internal Model used

The Company does not use an internal model for the calculations of the SCR and its MCR.

6.4 Non-Compliance with the MCR and Non-Compliance with the SCR

The Company complies with both the SCR and the MCR.

6.5 Any other disclosures

None.

Appendix A – Balance Sheet (S.02.01.02)

		Solvency II value
Assets		**C0010**
Goodwill	**R0010**	
Deferred acquisition costs	**R0020**	
Intangible assets	**R0030**	72
Deferred tax assets	**R0040**	0
Pension benefit surplus	**R0050**	0
Property, plant & equipment held for own use	**R0060**	8.869.668
Investments (other than assets held for index-linked and unit-linked contracts)	**R0070**	7.214.955
Property (other than for own use)	**R0080**	0
Holdings in related undertakings, including participations	**R0090**	0
Equities	**R0100**	0
Equities - listed	**R0110**	0
Equities - unlisted	**R0120**	0
Bonds	**R0130**	7.081.054
Government Bonds	**R0140**	7.081.054
Corporate Bonds	**R0150**	0
Structured notes	**R0160**	0
Collateralised securities	**R0170**	0
Collective Investments Undertakings	**R0180**	0
Derivatives	**R0190**	0
Deposits other than cash equivalents	**R0200**	0
Other investments	**R0210**	133.901
Assets held for index-linked and unit-linked contracts	**R0220**	0
Loans and mortgages	**R0230**	0
Loans on policies	**R0240**	0
Loans and mortgages to individuals	**R0250**	0
Other loans and mortgages	**R0260**	0
Reinsurance recoverables from:	**R0270**	601.898
Non-life and health similar to non-life	**R0280**	601.898
Non-life excluding health	**R0290**	596.137
Health similar to non-life	**R0300**	5.761
Life and health similar to life, excluding index-linked and unit-linked	**R0310**	0
Health similar to life	**R0320**	0
Life excluding health and index-linked and unit-linked	**R0330**	0
Life index-linked and unit-linked	**R0340**	0
Deposits to cedants	**R0350**	0

Insurance and intermediaries receivables	**R0360**	428.580
Reinsurance receivables	**R0370**	0
Receivables (trade, not insurance)	**R0380**	5.403.034
Own shares (held directly)	**R0390**	0
Amounts due in respect of own fund items or initial fund called up but not yet paid in	**R0400**	0
Cash and cash equivalents	**R0410**	634.074
Any other assets, not elsewhere shown	**R0420**	0
Total assets	**R0500**	23.152.281

		Solvency II value
Liabilities		**C0010**
Technical provisions - non-life	**R0510**	12.539.456
Technical provisions - non-life (excluding health)	**R0520**	12.521.548
TP calculated as a whole	**R0530**	0
Best Estimate	**R0540**	11.899.095
Risk margin	**R0550**	622.452
Technical provisions - health (similar to non-life)	**R0560**	17.908
TP calculated as a whole	**R0570**	0
Best Estimate	**R0580**	17.796
Risk margin	**R0590**	112
Technical provisions - life (excluding index-linked and unit-linked)	**R0600**	0
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**	0
TP calculated as a whole	**R0660**	0
Best Estimate	**R0670**	0
Risk margin	**R0680**	0
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**	0
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**	578.592
Derivatives	**R0790**	0
Debts owed to credit institutions	**R0800**	10.023
Financial liabilities other than debts owed to credit institutions	**R0810**	0
Insurance & intermediaries payables	**R0820**	141.611
Reinsurance payables	**R0830**	171.128
Payables (trade, not insurance)	**R0840**	366.384
Subordinated liabilities	**R0850**	0
Subordinated liabilities not in BOF	**R0860**	0
Subordinated liabilities in BOF	**R0870**	0
Any other liabilities, not elsewhere shown	**R0880**	0
Total liabilities	**R0900**	13.807.194
Excess of assets over liabilities	**R1000**	9.345.087

Appendix B – Premiums, Claims and Expenses by Line of Business (S.05.01.02)

		Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)								Total
		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	
		C0010	**C0020**	**C0030**	**C0040**	**C0050**	**C0060**	**C0070**	**C0080**	**C0200**
Premiums written										
Gross - Direct Business			112.539		9.132.737	3.604.985	-	947.203	18.175	13.815.639
Gross - Proportional reinsurance accepted										
Gross - Non-proportional reinsurance accepted										
Reinsurers' share			84.472		378.017	147.445	-	614.180	-	1.224.114
Net			28.067		8.754.720	3.457.540	-	333.023	18.175	12.591.525
Premiums earned										
Gross - Direct Business			115.552		8.899.353	3.492.265	-	940.159	18.181	13.465.510
Gross - Proportional reinsurance accepted										
Gross - Non-proportional reinsurance accepted										
Reinsurers' share			86.883		378.017	147.445	-	608.545	-	1.220.890
Net			28.669		8.521.336	3.344.820	-	331.614	18.181	12.244.620
Claims incurred										
Gross - Direct Business			14.595		7.396.359	2.508.087	-	756.440	-	10.675.481
Gross - Proportional reinsurance accepted										
Gross - Non-proportional reinsurance accepted										

Reinsurers' share			10.939		1.253.468	-	-	611.328	-	1.875.735
Net			3.656		6.142.891	2.508.087	-	145.112	-	8.799.746
Changes in other technical provisions										-
Gross - Direct Business										
Gross - Proportional reinsurance accepted										
Gross - Non- proportional reinsurance accepted										
Reinsurers' share										
Net										
Expenses incurred			45.813		2.469.660	955.364	-	263.477	5.610	3.739.924
Other expenses										
Total expenses										3.739.924

Appendix C – Non Life Technical Provisions (S.17.01.02)

		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**	**Total Non-Life obligation**
		C0020	**C0030**	**C0040**	**C0050**	**C0060**	**C0070**	**C0080**	**C0090**	**C0180**
Technical provisions calculated as a whole	**R0010**									
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole	**R0050**									
Technical provisions calculated as a sum of BE and RM										
Best estimate										
Premium provisions										
Gross	**R0060**		14.999		2.668.080	1.385.335	-	222.501	4.842	4.295.756
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	**R0140**		4.249		-	-	-	116.788	-	121.036
Net Best Estimate of Premium Provisions	**R0150**		10.750		2.668.080	1.385.335	-	105.713	4.842	4.174.720
Claims provisions										
Gross	**R0160**		2.797		6.115.768	1.179.407	-	323.163	-	7.621.135

Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	**R0240**		1.513		233.140	-	-	246.209	-	480.862
Net Best Estimate of Claims Provisions	**R0250**		1.284		5.882.628	1.179.407	-	76.954	-	7.140.273
Total Best estimate - gross	**R0260**		17.796		8.783.848	2.564.742	-	545.663	4.842	11.916.892
Total Best estimate - net	**R0270**		12.035		8.550.708	2.564.742	-	182.667	4.842	11.314.994
Risk margin	**R0280**		112		512.909	102.833	-	6.710	-	622.564
Amount of the transitional on Technical Provisions										
Technical Provisions calculated as a whole	**R0290**									
Best estimate	**R0300**									
Risk margin	**R0310**									
Technical provisions - total										
Technical provisions - total	**R0320**		17.908		9.296.757	2.667.575	-	552.373	4.842	12.539.456
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	**R0330**		5.761		233.140	-	-	362.997	-	601.898
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	**R0340**		12.147		9.063.617	2.667.575	-	189.376	4.842	11.937.558
Cash-flows of the Best estimate of Premium Provisions (Gross)										
Cash out-flows										
Future benefits and claims	**R0410**		5.621	-	1.896.372	1.061.151	-	148.139	3.191	3.114.473

Future expenses and other cash out-flows	**R0420**		9.525	-	824.715	343.611	-	76.921	1.692	1.256.464
Cash in-flows										
Future premiums	**R0430**		-	-	-	-	-	-	-	-
Other cash in-flows (incl. Recoverables from salvages and subrogations)	**R0440**		-	-	-	-	-	-	-	-
Cash-flows of the Best estimate of Claims Provisions (Gross)										
Cash out-flows										
Future benefits and claims	**R0410**		1.915		8.167.596	1.166.492	-	315.599	-	9.651.603
Future expenses and other cash out-flows	**R0420**		914		237.579	49.123	-	14.731	-	302.348
Cash in-flows										
Future premiums	**R0430**		-	-	-	-	-	-	-	-
Other cash in-flows (incl. Recoverables from salvages and subrogations)	**R0440**		-	-	1.885.859	-	-	-	-	1.885.859

Appendix D – Non-life insurance claims (S.19.01.21)

Gross Claims Paid (non-cumulative)

(absolute amount)

Development year

Year		**0**	**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**	**10&+**		**In Current year**	**Sum of years (cumulative)**
		C0010	**C0020**	**C0030**	**C0040**	**C0050**	**C0060**	**C0070**	**C0080**	**C0090**	**C0100**	**C0110**		**C0170**	**C0180**
Prior	**R0100**												**R0100**		
N-9	**R0160**	4.588.960	1.344.243	369.253	341.087	123.888	50.130	92.626	23.701	54.123	197.099		**R0160**	197.099	7.185.108
N-8	**R0170**	4.550.677	1.718.726	1.043.157	367.575	417.421	271.127	282.888	329.856	338.020			**R0170**	338.020	9.319.447
N-7	**R0180**	4.360.393	1.395.207	404.497	778.395	569.828	649.052	782.112	1.696.795				**R0180**	1.696.795	10.636.280
N-6	**R0190**	4.438.243	1.693.582	432.968	124.056	(10.843)	52.213	63.755					**R0190**	63.755	6.793.974
N-5	**R0200**	4.710.421	1.425.514	180.671	42.292	219.144	105.760						**R0200**	105.760	6.683.802
N-4	**R0210**	3.816.704	1.432.125	175.970	200.197	279.918							**R0210**	279.918	5.904.915
N-3	**R0220**	4.299.009	1.837.945	417.754	291.815								**R0220**	291.815	6.846.524
N-2	**R0230**	4.291.956	1.985.083	417.757									**R0230**	417.757	6.694.796
N-1	**R0240**	4.547.812	1.807.957										**R0240**	1.807.957	6.355.769
N	**R0250**	4.784.479											**R0250**	4.784.479	4.784.479
												Total	**R0260**	9.983.357	71.205.093

Gross undiscounted Best Estimate Claims Provisions

(absolute amount)

Development year

Year		0	1	2	3	4	5	6	7	8	9	10&+			Year end (discounted data)
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300			C0360
Prior	R0100													R0100	
N-9	R0160	-	1.113.237	1.009.337	881.715	577.125	509.216	459.258	95.466	229.244	43.140			R0160	40.804
N-8	R0170	1.709.625	1.360.425	751.774	574.830	527.400	359.608	200.837	355.647	282.072				R0170	264.582
N-7	R0180	2.199.658	943.244	852.604	669.397	556.607	262.157	988.322	623.959					R0180	585.548
N-6	R0190	2.231.225	2.374.277	1.744.303	1.667.602	417.610	352.963	300.566						R0190	282.067
N-5	R0200	1.356.691	945.838	601.680	387.850	480.263	294.687							R0200	276.495
N-4	R0210	1.340.955	868.111	575.453	666.707	365.904								R0210	343.267
N-3	R0220	1.029.718	755.747	1.141.697	413.962									R0220	388.360
N-2	R0230	1.349.818	1.686.880	1.116.932										R0230	1.052.855
N-1	R0240	3.098.568	1.100.555											R0240	1.039.988
N	R0250	3.446.085												R0250	3.272.725
													Total	R0260	7.546.691

Appendix E – Own Funds and Reconciliation Reserve (S.23.01.01)

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35						
Ordinary share capital (gross of own shares)	**R0010**	1.504.800	1.504.800			
Share premium account related to ordinary share capital	**R0030**	-	-			
~~I~~initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	**R0040**	-	-			
Subordinated mutual member accounts	**R0050**	-				
Surplus funds	**R0070**	-	-			
Preference shares	**R0090**	-				
Share premium account related to preference shares	**R0110**	-				
Reconciliation reserve	**R0130**	7.840.286	7.840.286			
Subordinated liabilities	**R0140**	-				
An amount equal to the value of net deferred tax assets	**R0160**	-				
Other own fund items approved by the supervisory authority as basic own funds not specified above	**R0180**	-	-			
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds						
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	**R0220**	-				
Deductions						
Deductions for participations in financial and credit institutions	**R0230**	-				
Total basic own funds after deductions	**R0290**	9.345.087	9.345.087	-	-	-
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	**R0300**					
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	**R0310**					
Unpaid and uncalled preference shares callable on demand	**R0320**					

A legally binding commitment to subscribe and pay for subordinated liabilities on demand	**R0330**					
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	**R0340**					
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	**R0350**					
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	**R0360**	-				
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	**R0370**	-				
Other ancillary own funds	**R0390**	-				
Total ancillary own funds	**R0400**	-				
Available and eligible own funds						
Total available own funds to meet the SCR	**R0500**	9.345.087	9.345.087	-	-	
Total available own funds to meet the MCR	**R0510**	9.345.087	9.345.087	-	-	
Total eligible own funds to meet the SCR	**R0540**	9.345.087	9.345.087	-	-	
Total eligible own funds to meet the MCR	**R0550**	9.345.087	9.345.087	-	-	
SCR	**R0580**	5.856.345				
MCR	**R0600**	4.000.000				
Ratio of Eligible own funds to SCR	**R0620**	159,57%				
Ratio of Eligible own funds to MCR	**R0640**	233,63%				
		C0060				
Reconciliation reserve						
Excess of assets over liabilities	**R0700**	9.345.085,79				
Own shares (held directly and indirectly)	**R0710**	-				
Foreseeable dividends, distributions and charges	**R0720**	-				
Other basic own fund items	**R0730**	1.504.800,00				
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	**R0740**	-				
Reconciliation reserve	**R0760**	7.840.285,79				
Expected profits						
Expected profits included in future premiums (EPIFP) - Life business	**R0770**	-				
Expected profits included in future premiums (EPIFP) - Non- life business	**R0780**	-				
Total Expected profits included in future premiums (EPIFP)	**R0790**	-				

Appendix F –Solvency Capital Requirement - for undertakings on Standard Formula (S.25.01.21)

-		Gross solvency capital requirement	USP	Simplifications
		C0110	**C0090**	**C0100**
Market risk	**R0010**	2.032.579	-	-
Counterparty default risk	**R0020**	1.158.560	-	-
Life underwriting risk	**R0030**	-		-
Health underwriting risk	**R0040**	49.972		-
Non-life underwriting risk	**R0050**	4.110.285		-
Diversification	**R0060**	- 1.644.646	-	-
Intangible asset risk	**R0070**	58	-	-
Basic Solvency Capital Requirement	**R0100**	5.706.808	-	-
				-
Calculation of Solvency Capital Requirement	-	**C0100**	-	-
Operational risk	**R0130**	403.965	-	-
Loss-absorbing capacity of technical provisions	**R0140**	-	-	-
Loss-absorbing capacity of deferred taxes	**R0150**	- 254.428	-	-
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	**R0160**	-	-	-
Solvency Capital Requirement excluding capital add-on	**R0200**	5.856.345	-	-
Capital add-on already set	**R0210**	-	-	-
Solvency capital requirement	**R0220**	5.856.345	-	-
Other information on SCR		-	-	-
Capital requirement for duration-based equity risk sub-module	**R0400**		-	-
Total amount of Notional Solvency Capital Requirements for remaining part	**R0410**		-	-
Total amount of Notional Solvency Capital Requirements for ring fenced funds	**R0420**		-	-
Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	**R0430**		-	-
Diversification effects due to RFF nSCR aggregation for article 304	**R0440**		-	-

Appendix G – Minimum Capital Requirements - Only life or only non-life insurance or reinsurance activity (S.28.01.01)

Linear formula component for non-life insurance and reinsurance obligations					
		C0010			
MCR_{NL} Result	**R0010**				
				Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
				C0020	**C0030**
Medical expense insurance and proportional reinsurance			**R0020**	-	-
Income protection insurance and proportional reinsurance			**R0030**	12.035	28.067
Workers' compensation insurance and proportional reinsurance			**R0040**	-	-
Motor vehicle liability insurance and proportional reinsurance			**R0050**	8.550.708	8.754.720
Other motor insurance and proportional reinsurance			**R0060**	2.564.742	3.457.540
Marine, aviation and transport insurance and proportional reinsurance			**R0070**	-	-
Fire and other damage to property insurance and proportional reinsurance			**R0080**	182.667	317.730
General liability insurance and proportional reinsurance			**R0090**	4.842	18.175
Credit and suretyship insurance and proportional reinsurance			**R0100**	-	-
Legal expenses insurance and proportional reinsurance			**R0110**	-	-
Assistance and proportional reinsurance			**R0120**	-	-
Miscellaneous financial loss insurance and proportional reinsurance			**R0130**	-	-
Non-proportional health reinsurance			**R0140**	-	-
Non-proportional casualty reinsurance			**R0150**	-	-
Non-proportional marine, aviation and transport reinsurance			**R0160**	-	-
Non-proportional property reinsurance			**R0170**	-	-
Linear formula component for life insurance and reinsurance obligations					
		C0040			
MCR_L Result	**R0200**	-			

				Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
				C0050	**C0060**
Obligations with profit participation - guaranteed benefits			**R0210**	-	
Obligations with profit participation - future discretionary benefits			**R0220**	-	
Index-linked and unit-linked insurance obligations			**R0230**	-	
Other life (re)insurance and health (re)insurance obligations			**R0240**	-	
Total capital at risk for all life (re)insurance obligations			**R0250**		-
Overall MCR calculation					
		C0070		-	
Linear MCR	**R0300**	2.049.267		-	
SCR	**R0310**	5.856.345		-	-
MCR cap	**R0320**	2.635.355		-	
MCR floor	**R0330**	1.464.086		-	
Combined MCR	**R0340**	2.049.267		-	
Absolute floor of the MCR	**R0350**	4.000.000		-	
-	-	**C0070**		-	
Minimum Capital Requirement	**R0400**	4.000.000		-	