MetLife

MetLife Europe Insurance d.a.c.

Solvency II Solvency and Financial Condition Report

For the year ended 31 December 2018

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Executive summary

Background

MetLife Europe Insurance d.a.c. (the Undertaking) is an Irish incorporated entity domiciled in Ireland and is authorised by the Central Bank of Ireland (CBI) to transact non-life assurance business in Classes 1, 2, 8, 9, 16 and 18 under the European Union (EU) (Insurance and Reinsurance) Regulations 2015 (S.I. No 485 of 2015).

The Undertaking's immediate parent company is MetLife EU Holding Company Limited (MetLife EU) and its ultimate parent company is MetLife Inc., a company domiciled in the United States of America (USA).

MetLife Inc. operates within Europe through various subsidiaries. The Undertaking leverages the options provided by the European Insurance Directives to "passport" throughout the EU from a single base in Ireland. The Undertaking has branches in Italy, Spain, Portugal, France, Slovakia, Czech Republic and Romania. The Undertaking also operates via Freedom of Service (FOS) in Germany, Austria, Greece, Poland and the United Kingdom (UK). The Undertaking reinsures business from Russia.

The Undertaking is focused on the provision of involuntary loss of employment (ILOE) cover, mobile phone insurance (MPI) and travel insurance, as an add-on to MetLife Europe d.a.c.'s core life insurance offerings. The Undertaking does not sell independently outside its strategic role to support MetLife Europe d.a.c. MetLife Europe d.a.c. is an Irish incorporated entity authorised to write primarily life insurance business in Europe.

The Undertaking is required to submit the 2018 Solvency and Financial Condition Report (SFCR) to the Central Bank of Ireland (CBI) as part of the 2018 annual Solvency II returns. The SFCR is prepared pursuant to the Commission Delegated Regulation (EU) 2015/35 (The Delegated Acts) and the European Insurance and Occupational Pensions Authority (EIOPA) Final Report on Public Consultation No. 14/047. The Delegated Acts supplement Directive 2009/138/EC as implemented in Ireland by the EU (Insurance and Reinsurance) Regulations 2015.

The SFCR is an annual public document and is available on the Undertaking's website.

Content

The following summarises the information included in the SFCR by section and notes any material changes during the year.

A - Business and Performance

Significant business events

On 21 November 2018, MetLife EU purchased the 7% minority shareholding from American Life Insurance Company to become the sole owner of the Undertaking.

On 29 November 2018, the Undertaking announced that certain finance and actuarial activities would transfer from Ireland to an existing Centre of Excellence in India and new Centres of Excellence in Poland and Malaysia in 2019.

On 6 December 2018, the Undertaking paid a dividend of €15.3m to MetLife EU. The directors were satisfied that there was sufficient solvency cover, based on the Own Risk and Solvency Assessment (ORSA), to support the payment of the dividend. In addition, there were sufficient distributable reserves under International Financial Reporting Standards (IFRS) based on the Companies Acts 2014 requirements.

In January 2019, the Undertaking launched its direct-to-consumer (DTC) business via FOS in Poland. The Undertaking's DTC products offer predefined protection packages for accident and health insurance cover.

The four cornerstones of the Undertaking’s strategy are to optimise value and risk, drive operational excellence, deliver the right solutions for the right customers and strengthen distribution advantage. To execute its strategy, MetLife Inc. has identified "enablers" such as leveraging digital to help drive transformation and combat customer confusion and hidden costs by focusing on simplifying operations and products. The Undertaking is evaluating processes with the view of simplifying or automating where possible to ensure it can continually adapt to the environment it operates in.

Business performance

The financial statements are prepared under IFRS. There is an increase in IFRS profit of €1.8m from €1.2m in 2017 to €4m in 2018. This is mainly due to the write off the Italy deferred tax asset in 2017, which was based on lower Italy profit forecasts. There are no material changes by line of business or by geographical segment over the reporting period.

B - Systems of Governance

Governance structure and roles

The key organs of the system of governance are the Board of Directors, Executive Management and the various committees. There has been no material changes to the systems of governance over the reporting period.

The Board directs the Undertaking's affairs to ensure its prosperity, whilst meeting the appropriate interests of its shareholders and third parties, such as customers and regulators. In particular, the Board provides effective, prudent and ethical oversight of the Undertaking.

The Board is responsible for, among other things, where relevant, reviewing and/or setting and overseeing:

- The business strategy;
- The amounts, types and distribution of capital adequate to cover the risks of the Undertaking;
- The strategy for the ongoing management of material risks;
- A robust and transparent organisational structure with effective communication and reporting channels;
- A remuneration framework that is in line with the risk strategy of the Undertaking; and
- An adequate and effective internal control framework that includes well-functioning risk management, compliance and internal audit functions as well as an appropriate financial reporting and accounting framework.

The Corporate Governance Structure is supported by the Executive Management organisational structure, which defines key areas of authority and responsibility and establishes the appropriate lines of reporting. The Executive Management is responsible for the day to day running of the Undertaking and is led by the Chief Executive Officer (CEO).

The committees of the Board are:

- Audit Committee;
- Risk Committee;

Fit and proper requirements

The Undertaking's Fitness and Probity Policy sets out the minimum standards, in compliance with the CBI Fitness and Probity Standards and relevant legislation. It is there to ensure that a person, who is known as a 'Responsible Person', has the necessary qualities and competencies in order to allow him/her to perform the duties and carry out the responsibilities of his/her position within the Undertaking. The qualities and competencies relate to the integrity demonstrated by a Responsible Person in personal behaviour and business conduct, soundness of judgement, a sufficient degree of knowledge and experience and appropriate professional qualifications.

Risk management and internal controls

The Risk Management Framework (the Framework) sets out the approaches to risk management and structure to be followed by all associates in their capacity as executives, management and staff. The key objectives of the Framework are to:

- Promote a strong risk culture in the Undertaking, rooted in the Undertaking's purpose and values, in particular customer protection;
- Ensure consistent, systematic management of risks across all businesses, operations and risk types; and
- Enable decision makers to efficiently direct the Undertaking's resources to appropriate business opportunities that are within the Board's risk appetite.

A key element of risk management is the Own Risk and Solvency Assessment (ORSA). The ORSA is a bespoke strategic analysis which links together all pillars of Solvency II and all areas of the Undertaking. It enables the Board to understand the risks faced, and how they translate into capital needs or alternatively require mitigation actions. The ORSA process is an ongoing and continuous process, of which the annual report is a complete board-level roundup at a point in time providing a meaningful and useful report to the Board. The results of the ORSA process and the insights gained in the process provide input into risk management, long-term capital management, business planning and product development and design. One ad hoc ORSA report was prepared during the year, to explore the proposal to sell Accident and Health (A&H) business into Poland via FOS. The ad hoc ORSA report was approved by the Board and subsequently submitted to the CBI.

The Undertaking's Control Framework promotes the importance of having appropriate internal controls and ensuring that all associates are aware of their role in the internal control system. The Control Framework sets out clear standards for the design, operation, validation and oversight of the system of Internal Control. It defines how effective internal control is achieved through joint responsibilities of the general managers and the Heads of Functions.

C - Risk Profile

The Undertaking is exposed to underwriting, market, credit, liquidity and operational risk. Overall, the risk profile remained relatively stable over the year.

Underwriting risk refers to fluctuations in the timing, frequency and severity of insured events relative to the expectations of the Undertaking at the time of underwriting, arising as a consequence of writing business where financial outgo depends upon loss of employment and lapse experience. Underwriting risks are primarily mitigated through reinsurance, diversification and through limits and guidelines which are monitored by the Product Management Committee (PMC).

The Undertaking does not take on market risk as a strategic risk. The Undertaking seeks to incur only minimal risk exposure as arises from its insurance business. The Undertaking is exposed to market risks, including interest rates due to timing differences of asset and liability cash flows and basis differences between valuation rates, different currencies and positions held to facilitate policyholder transactions. Market risks are primarily mitigated through the Undertaking's investment limits and guidelines.

The Undertaking is exposed to credit risks (i.e. the risk of a value decrease of assets or increase of liabilities due to the default of third parties, or the increase of the probability of such a default and/or the associated loss). Exposure to credit risk comes primarily from the investment portfolio and from a number of counterparties related to risk mitigation. Credit risks are primarily mitigated through asset allocation, diversification and single-exposure limits. For counterparty exposures, the Undertaking may require the placement of collateral.

The Undertaking is exposed to liquidity risks where it is obliged to settle liabilities at short notice and assets cannot be liquidated at all or only with very significant haircuts. Liquidity risks are primarily mitigated through asset allocation, diversification and single-exposure limits, and by avoiding entering obligations to provide liquidity to counterparties.

The Undertaking is exposed to operational risk consistent with other financial institutions, including the impact of changes in the regulatory and legal environments, the dependency on multiple internal and external operators (for investment activities as an example) and complex modelling for financial reporting and solvency reporting. Operational risks are primarily mitigated through functional controls, which are integral elements of the Undertaking's Risk Framework and independently validated on a regular basis.

In addition to the risks covered above, the Undertaking may in the future also be exposed to emerging risks. The Undertaking currently considers geopolitical risk, disruptive technology (including transformative technology for insurance distribution ('InsurTech') and cybersecurity issues) and regulatory changes on data protection, business conduct and financial reporting that can transform the insurance industry, as key emerging risks.

The Undertaking has a strategic role to support MetLife Europe d.a.c., therefore its success depends upon the success of this entity. The Undertaking reviews its risk exposures regularly and considers potential actions to align exposure to risk appetite.

D - Valuation for solvency purposes

Assets

Assets are valued at fair value for Solvency II. This represents the amounts for which the assets could be exchanged between knowledgeable willing parties in an arm's length transaction. The main valuation differences between Solvency II and IFRS relate to deferred acquisition costs and intangible assets, which are not recognised under Solvency II.

Technical Provisions

The technical provisions correspond to the current amount the Undertaking would have to pay if they were to transfer their insurance obligations immediately to another Undertaking. The value of technical provisions are equal to the sum of a best estimate liability (BEL) and a risk margin. The best estimate corresponds to the probability weighted average of future cash-flows taking account of the time value of money. The cash-flow projections reflect the expected realistic future demographic, legal, medical, technological, social and economic developments over the lifetime of the insurance and reinsurance obligations. The risk margin is a fair value adjustment that captures the cost of holding the unhedgeable part of the Solvency Capital Requirement (SCR) over the lifetime of the policies in force.

The calculation of amounts recoverable from reinsurance contracts follow the same principles and methodology as presented above for the calculation of other parts of the technical provisions.

Solvency II and IFRS have different rules for classifying/grouping insurance contracts, and these rules affect the valuation of the liabilities. Solvency II capitalises all future profits, subject to contract boundaries, whereas IFRS generally does not. Solvency II determines a risk margin, whereas this concept does not generally apply to IFRS.

Solvency II requires assumptions to be based on best estimate whereas IFRS may apply Provisions for Adverse deviations to the assumptions used to value the reserves. The Solvency II assumptions are revised on a regular basis to adjust for recent experience and changes to market factors. The principal assumptions used in the determination of technical provisions relate to demographic, expense and economic assumptions.

Net technical provisions have decreased by €2.8m from €11.7 m in 2017 to €8.9m in 2018. This is mainly due to business, experience and market movements.

E - Capital Management

Capital Management Policy

The strategic objectives of capital management for the Undertaking are:

- Regulatory compliance: to ensure compliance with the Undertaking's regulatory capital requirements.
- Efficient allocation: to manage and allocate capital efficiently to achieve sustainable returns and facilitate growth objectives.
- Financial strength: to ensure access to capital markets on competitive terms, so that the Undertaking’s overall cost of capital is minimised.

Taken together, these strategic goals strengthen the Undertaking's ability to withstand losses from adverse business and market conditions, enhance its financial flexibility and serve the interests of stakeholders.

The Undertaking's capital is monitored through the capital management process and within the Undertaking's stated risk appetite limits. Any breaches of these limits is escalated in accordance with and as defined by any relevant regulatory or internal policies. The Undertaking's risk appetite recognises the regulatory minimum standard, as it applies to technical provisions, own funds and capital under Solvency II, and sets the target ongoing solvency level in order to enable the Undertaking to withstand the financial implications of adverse experience.

There has been no material changes to capital management policy over the reporting period.

Own funds and SCR

The SCR is calculated using the standard formula approach. This method uses stresses for each of the individual risks as calibrated by EIOPA. EIOPA also provides the standard correlation matrices for the purpose of aggregation. It is based on a modular approach consisting of a core of life, non-life, market, health and counterparty default risks with associated sub-modules. These are aggregated using correlation matrices, both at the sub-module and the main module level. The operational risk component and adjustments for the risk absorbing effect of future profit sharing and deferred taxes are then allowed for, to give the overall SCR.

The own funds, SCR, solvency ratio and Minimum Capital Requirement (MCR) are as follows:

	31-Dec-18	**31-Dec-17**	**Movement**
	€'000	**€'000**	**€'000**
Own Funds			
Tier One	42,663	52,491	(9,828)
Tier Two	—	—	—
Tier Three	42	14	28
Restrictions	—	—	—
Eligible own funds for SCR	**42,705**	**52,505**	**(9,800)**
SCR	18,873	18,893	(20)
Solvency Ratio	226%	278%	(52)%
Eligible own funds for MCR	42,663	52,491	(9,828)
MCR	4,718	4,723	(5)

Eligible own funds have decreased by €9.8m from €52.5m at 31 December 2017 to €42.7m at 31 December 2018. This is primarily due to the dividend payment partially offset by business and capital market movements. The SCR has remained stable at €18.9m. As a result, the solvency ratio decreased from 278% in 2017 to 226% in 2018.

The Undertaking has had own funds in excess of both the SCR and MCR requirements over the reporting period. The ORSA assessments to date indicate that the Undertaking is adequately capitalised.

Appendix

This includes all public QRTs.

Approval

The SFCR was approved by the Board of Directors on 10 April 2019.

A Business and performance

A.1 Business

A.1.1 Overview

The Undertaking is an Irish incorporated entity domiciled in Ireland and was incorporated on 25 June 2009. On 10 May 2012, the Undertaking was authorised by the Central Bank of Ireland (CBI) to conduct business as a Non-Life Insurance Undertaking with its head office in Ireland.

The Undertaking is authorised to write Class 1, 2, 8, 9, 16 and 18 Non-Life Insurance under the European Union (EU) Insurance and Reinsurance Regulations 2015.

The Undertaking's immediate parent company is MetLife EU and its ultimate parent company is MetLife Inc., a company domiciled in the USA. Refer to A.1.3 for details on the Group entity structure.

MetLife Inc. operates within Europe through various subsidiaries. The Undertaking leverages the options provided by the European Insurance Directives to "passport" throughout the EU from a single base in Ireland. The Undertaking has branches in Italy, Spain, Portugal, France, Slovakia, Czech Republic and Romania. The Undertaking also operates via FOS in Germany, Austria, Greece, Poland and the UK. The Undertaking reinsures business from Russia.

The Undertaking's regulatory supervisor is the CBI, whose address is:

Central Bank of Ireland
New Wapping Street,
North Wall Quay,
Dublin 1

The Undertaking's external auditor is Deloitte Ireland LLP, whose address is:

Deloitte Ireland LLP
Chartered Accountants and Statutory Audit Firm
Deloitte & Touche House
Earlsfort Terrace
Dublin 2

See section A.2 for a description of the Undertaking's underwriting performance by material lines of business and geographical areas.

A.1.2 Significant business and external events

The Undertaking is focused on the provision of ILOE cover, MPI and travel insurance, as an add-on to MetLife Europe d.a.c.'s core life insurance offerings. The Undertaking does not sell independently outside its strategic role to support MetLife Europe d.a.c. MetLife Europe d.a.c. is an Irish incorporated entity authorised to write primarily life insurance business in Europe.

On 21 November 2018, MetLife EU purchased the 7% minority shareholding from American Life Insurance Company to become the sole owner of the Undertaking.

On 29 November 2018, the Undertaking announced that certain finance and actuarial activities would transfer from Ireland to an existing Centre of Excellence in India and new Centres of Excellence in Poland and Malaysia in 2019.

On 6 December 2018, the Undertaking paid a dividend of €15.3m to MetLife EU. The directors were satisfied that there was sufficient solvency cover, based on the ORSA, to support the payment of the dividend. In addition, there were sufficient IFRS distributable reserves based on the Companies Acts 2014 requirements.

In January 2019, the Undertaking launched its DTC business via FOS in Poland. The Undertaking's DTC products offer predefined protection packages for accident and health insurance cover.

A.1.3 Entity structure

The Undertaking's immediate parent company is MetLife EU and its ultimate parent company is MetLife Inc. The Undertaking's parent is subject to group regulatory supervision by the CBI.

The Undertaking has authorised share capital of 100,000,000 shares of €1 each. At 31 December 2018, the Undertaking had issued €2,048,388 (2017: €2,048,388) in share capital. The qualifying holdings, number of shares and voting rights of the issued shares are:

	31-Dec-18		31-Dec-17	
	Holdings	**Shares**	**Holdings**	**Shares**
MetLife EU Holding Company Limited	100.00%	2,048,388	93.00%	1,905,001
American Life Insurance Company (Alico)	—	—	7.00%	143,387

A.1.4 Total performance

Total performance	Section reference	**2018 €'000**	2017 €'000
Operating			
Underwriting result	A2.1	**9,808**	10,831
Investment income	A3.1	**339**	485
Other income	A4	**277**	18
Expenses	A4	**(5,140)**	(6,153)
Tax	A4	**(1,116)**	(4,227)
Total operating		**4,168**	954
Non-operating			
Investment income	A3.1	**5**	41
Foreign exchange gain/(loss)	A4	**(72)**	271
Expenses	A4	**(49)**	(34)
Tax	A4	**15**	10
Total non-operating		**(101)**	288
Profit for the financial year		**4,067**	1,242

The financial values are per the Undertaking's IFRS financial statements.

Analysis is provided in the sections referenced above.

A.2 Underwriting performance

A.2.1 Underwriting performance by line of business

The table below sets out the analysis of 2018 underwriting performance against the prior year.

	Miscellaneous financial loss		**Assistance**		**Total**	
	2018 €'000	2017 €'000	**2018 €'000**	2017 €'000	**2018 €'000**	2017 €'000
Net earned premium	**15,503**	15,829	**1,881**	3,290	**17,384**	19,119
Reinsurance commission income	**7,178**	5,917	**—**	—	**7,178**	5,917
Total premium and commission income	**22,681**	21,746	**1,881**	3,290	**24,562**	25,036
Claims incurred	**(1,711)**	(1,656)	**(224)**	(188)	**(1,935)**	(1,844)
Change in technical provisions	**1,322**	1,119	**35**	—	**1,357**	1,119
Total policyholder benefits	**(389)**	(537)	**(189)**	(188)	**(578)**	(725)
Commission	**(13,235)**	(9,491)	**(1,336)**	(2,374)	**(14,571)**	(11,865)
Other variable expenses	**(751)**	(1,138)	**—**	—	**(751)**	(1,138)
Total variable expenses	**(13,986)**	(10,629)	**(1,336)**	(2,374)	**(15,322)**	(13,003)
Deferred acquisition costs	**1,146**	(477)	**—**	—	**1,146**	(477)
Underwriting result	**9,452**	10,103	**356**	728	**9,808**	10,831

The underwriting profit decreased by €1m from €10.8m in 2017 to €9.8m in 2018. This is mainly driven by lower growth in Italy and in the FOS business in head office.

A.2.2 Underwriting performance by geographical segment

The Undertaking performance, split by material geographic performance is set out in the table below:

	UK and Ireland		Western Europe		Central Europe		Total	
	2018	2017	**2018**	2017	**2018**	2017	**2018**	2017
	€'000	€'000	**€'000**	€'000	**€'000**	€'000	**€'000**	€'000
Premium and commission income	**3,567**	3,863	**15,484**	14,268	**5,511**	6,905	**24,562**	25,036
Policyholder benefits	**(298)**	(248)	**(69)**	(330)	**(211)**	(147)	**(578)**	(725)
Variable expenses	**(1,865)**	(1,125)	**(12,202)**	(8,158)	**(1,255)**	(3,720)	**(15,322)**	(13,003)
Deferred acquisition costs	**(44)**	23	**1,252**	(130)	**(62)**	(370)	**1,146**	(477)
Underwriting result	**1,360**	2,513	**4,465**	5,650	**3,983**	2,668	**9,808**	10,831

See the narrative analysis in section A.2.1 which sets out the main drivers of the movements in underwriting profit in the branches.

A.3 Investment Performance

A.3.1 Investment return

	2018	2017
	€'000	€'000
Operating investment income		
Interest bearing securities		
Net interest income	**400**	530
Investment management expenses	**(61)**	(45)
Total operating investment income	**339**	485
Non-operating investment income		
Interest bearing securities		
Realised gains	**5**	41
Total non-operating investment income	**5**	41
Total investment return	**344**	526

Total investment return decreased by €0.19m from €0.53m in 2017 to €0.34m in 2018. This is mainly driven by:

- Decrease in realised gains from disposals in 2018.
- Lower interest income across the period resulting from a decrease in assets under management and reinvestment in lower duration and yielding assets.

A.3.2 Gains/losses recognised directly in equity

	2018	2017
	€'000	€'000
Investment gains/(losses) recognised directly in equity	**(281)**	(260)

The investment losses reflect the accumulation of the movements from amortised cost to fair value on available for sale financial assets. These are disclosed in equity in the IFRS financial statements.

Investment losses have remained relatively stable over the year, increasing by €0.02m from €(0.26)m in 2017 to €(0.28)m in 2018.

A.3.3 Investments in securitisations

The Undertaking has no investments in securitisations.

A.4 Performance of other activities

The other income and expenses of the Undertaking for the year are set out below:

	2018	2017
	€'000	€'000
Performance of other activities		
Operating		
Other income	**277**	18
Expenses	**(5,140)**	(6,153)
Tax	**(1,116)**	(4,227)
Total operating	**(5,979)**	(10,362)
Non-operating		
Expenses	**(49)**	(34)
Foreign exchange gain/(loss)	**(72)**	271
Tax	**15**	10
Total non-operating	**(106)**	247
Net results from other activities	**(6,085)**	(10,115)

Net costs from other activities have decreased by €4m from €10.1m in 2017 to €6.1m in 2018. This is mainly driven by:

- Other income is higher in 2018 due to interest generated by a VAT refund in Spain.
- Expenses are lower in 2018 due mainly to lower costs in Spain, Slovakia and head office.
- The tax variance is due to the 2017 write off of the Italian deferred tax asset, which was based on lower Italy profit forecasts.

A.5 Any other information

Intra-group transactions

Intra-group operations and transactions are mainly related to the Undertaking's reinsurance and operational arrangements.

All intra-group operations and transactions are at arm's length as it would be if the operations and transactions were with a third party.

A.5.1 Outstanding balances at year end

The Undertaking has intra-group balances with the following companies that are subsidiaries of its ultimate parent, MetLife Inc.:

	2018	2017
	€'000	€'000
ALICO US	**10,586**	7,382
MetLife Europe d.a.c.	**104**	856
MetLife Greece	**18**	107
MetLife Investments Limited	**—**	(1)
MetLife Europe Services Limited	**(9)**	(6)
MetLife Services Slovakia	**—**	(24)
MetLife Services EEIG	**(1,538)**	(339)

A.5.2 Material transactions during the year

On 21 November 2018, MetLife EU purchased the 7% minority shareholding from American Life Insurance Company to become the sole owner of the Undertaking.

On 6 December 2018, the Undertaking paid a dividend of €15.3m to its immediate parent, MetLife EU.

See note A.1.2 for further details.

A.5.3 Leases

The Undertaking does not hold any leases.

A.5.4 Events after the year end

As noted in section A.1.2, the Undertaking launched its DTC business via FOS in Poland in January 2019. The Undertaking's DTC products offer predefined protection packages for accident and health insurance cover.

B System of governance

B.1 General information on the system of governance

B.1.1 Governance structure

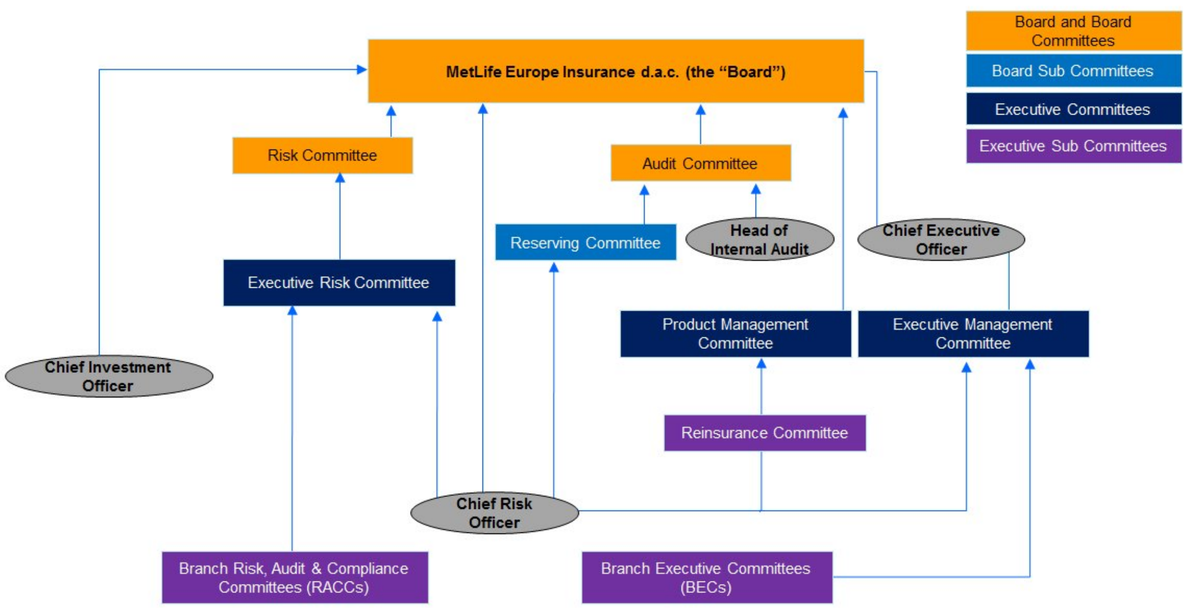
A consistent governance structure is in place across MetLife's European Economic Area (EEA) group of entities, supporting clear decision making, roles and responsibilities. The Corporate Governance Manual (the Manual) describes the corporate governance within the Undertaking. The Manual ensures that there is a common understanding of the following:

- key organs of the Undertaking (i.e. the Board of Directors (the Board), Executive Management and the various committees) and their roles;
- the membership of the Board, its role, the frequency of meetings and the process for making changes to Board membership;
- the membership of each of the Undertaking’s committees, each committee’s role, the frequency of meetings and how changes to membership are effected;
- who is empowered to act on behalf of the Undertaking and in what capacity and to what extent; and
- how certain key individuals are appointed, resign or are removed.

The Manual also provides a central record of the current membership of the Board, the various committees, and a list of all Pre Approval Controlled Functions, i.e. roles for which CBI prior approval is required.

The governance structure defines the key areas of authority and responsibility and establishes the appropriate lines of reporting. The Undertaking is structured so as to achieve its objectives and to enable effective risk management and to carry out its activities in a manner reflective of its size and requirements.

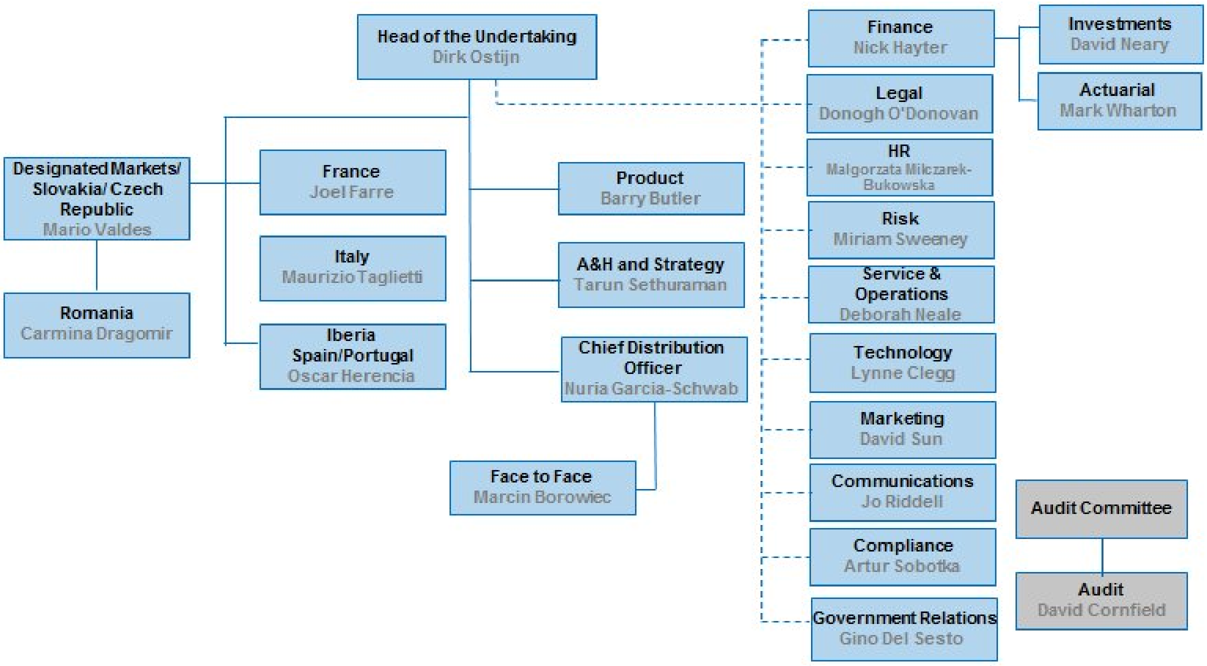
Figure: Undertaking's Corporate Governance Structure



The Corporate Governance Structure is supported by the Executive Management organisational structure, which defines key areas of authority and responsibility and establishes the appropriate lines of reporting. The Executive Management is responsible for the day to day running of the Undertaking and is led by the Chief Executive Officer (CEO).

In Ireland, there is an established fitness and probity regime and the list of 'key functions' is naturally and conclusively defined by all those who are subject to fit and proper requirements under the CBI's guidance. The list of those persons is detailed within section B.2. The following chart indicates the positions of key function holders within the Executive Management team and and their reporting lines.

Figure: Executive Management Organisational Structure*



*Note that David Neary was formally appointed as Head of Hedging and Investment Governance shortly after 31 December 2018. During 2018, the role was held by Pat O' Grady. It is worth noting there have been some changes made to the management structure reflected in the above chart since 31 December 2018. The changes result in the expansion of certain individual responsibilities however there is no change to the named personnel set out in the above organisational chart.

B.1.2 Role of the Board

The Board directs the Undertaking's affairs to ensure its prosperity, whilst meeting the appropriate interests of its shareholders and third parties, such as customers and regulators. In particular, the Board provides effective, prudent and ethical oversight of the Undertaking.

The Board is responsible for, among other things, where relevant, reviewing and/or setting and overseeing:

- the business strategy;
- the amounts, types and distribution of capital adequate to cover the risks of the Undertaking;
- the strategy for the on-going management of material risks;
- a robust and transparent organisational structure with effective communication and reporting channels;
- a remuneration framework that is in line with the risk strategy of the Undertaking; and
- an adequate and effective internal control framework, that includes well-functioning risk management, compliance and internal audit functions as well as an appropriate financial reporting and accounting framework.

The Board focuses on the following key areas:

Vision and values

- Guide and set the pace for the Undertaking's current operations and future development.
- Promote appropriate values throughout the Undertaking (e.g. values on compliance through the compliance statement).
- Determine policies and ensure they are consistent with, and promote the vision and values, of the Undertaking.

Strategy and structure

- Review present and future opportunities, threats and risks in the external environment and strengths, weaknesses and risks relating to the Undertaking.
- Review strategic options, decide on those to be pursued and the means to implement and support them.
- Determine and review the Undertaking's goals.
- Ensure that the Undertaking's organisational structure and capability are appropriate for implementing the chosen strategies and manage risk and compliance effectively in the Undertaking.
- Ensure that risk and compliance are managed effectively throughout the Undertaking.
- Oversee remuneration practices and shall ensure that the Undertaking has remuneration policies and practices that are consistent with and promote sound and effective risk management.

Delegation to management

The Board delegates certain matters by board resolution, by terms of reference for committees of the Board or by power of attorney to specific individuals to act on behalf of the Board in respect of certain matters. Where the Board delegates authority it shall monitor the exercise of this delegated authority. The Board cannot abrogate its responsibility for delegated authority.

Meetings of the Board, Board working sessions and Board training sessions

The Board meets at least four times per calendar year and at least once in every six month period.

All directors attend Board meetings in person unless they are unable to do so due to circumstances beyond their control (e.g. illness). However, where physical presence is not possible, directors may attend by teleconference or video-conference. In the event of the absence of the Chairman, an independent non-executive director chairs Board meetings.

Board working sessions and Board training sessions are scheduled regularly to discuss key developments, projects and initiatives. The aim of these sessions is to provide the Board with the opportunity to explore, at an early stage, topics which will be presented at a future Board meeting for consideration.

All Board meetings are arranged through the Company Secretary and the Chairman. Minuting of all Board meetings follow the Board/Committee minute review process in line with the Manual.

B.1.3 Role of Directors

The role of the independent non-executive director

As an integral component of the Board, independent non-executive directors represent a key layer of oversight. It is essential for independent non-executive directors to bring an independent viewpoint to the deliberations of the Board that is objective and independent of the activities of the executives.

The role of the executive director

The role of the executive director includes to propose strategies to the Board and, following Board scrutiny, to execute the agreed strategies to the highest possible standards.

Responsibilities of all directors

All directors are responsible for the following:

- ensuring that there is an effective executive team in place;
- participating actively in constructively challenging and developing strategies proposed by the executive team;
- participating actively in the Board’s decision making process;
- participating actively in committees of the Board; and
- exercising appropriate oversight over execution by the executive team of the agreed strategies, goals and objectives and to monitor reporting of performance.

B.1.4 Matters reserved for the Board

Strategy and Management

- Responsibility for overseeing the management of the Undertaking.
- Approval of the Undertaking's long term objectives and business strategy; and review of performance in light of strategy.
- Approval of all relevant Undertaking policies and MetLife Group policies where they apply to the Undertaking.
- Decisions to extend the Undertaking's activities into new business or geographic areas.
- Decisions to cease to operate all or any material part of the Undertaking's business.
- Decisions to vary the Undertaking's strategy for meeting the policyholder liabilities.

Structure and Capital

- Reviewing and approving the Undertaking's financial plans.
- Approval of changes relating to the Undertaking's capital structure, including share issues, reduction in capital, loan capital and gifts of capital.

Financial Reporting and Controls

- Approval of the annual report and accounts.
- Approval of the annual regulatory return to the CBI.
- Approval of significant changes in accounting policies and practices.
- Approval of dividends.
- Approval of the external auditor's fees.

Internal Controls

- Responsibility for setting and overseeing the establishment of an adequate and effective internal control and risk management systems, including approval of the internal audit plan.
- Receiving reports from the audit and risk committees on, and reviewing effectiveness of, the Undertaking's risk and control processes.
- Approval of the Risk Management Framework.
- Approval of the ORSA Process.

Non-insurance Contracts

- Approval of capital projects.
- Approval of acquisitions, mergers or disposals.
- Approval of material contracts by nature or amount entered into by the Undertaking in the ordinary course of business (e.g., acquisitions or disposals of fixed assets). Note: Material includes, but is not limited to, consideration over €7,500,000 (or €5,000,000 net of reinsurance, per matter).
- Approval of new bank borrowing facilities.

Board Membership and other Appointments

- Other than where the shareholder exercises the right, appointment and removal of directors.
- Approval of changes to Board structure, size and composition.
- Appointment and removal of the Chairman.
- Appointment and removal of the Company Secretary.
- Appointment, reappointment and removal of the external auditor.
- Appointment and removal of Chairmen and members of committees of the Board.
- Appointment and removal from office of the CEO or the Head of a Controlled Function.

Remuneration

- Review the remuneration structure for employees of the Undertaking in line with the risk strategies of the Undertaking.

Delegation of Authority

- Maintain oversight of all committees of the Board including approval of the terms of reference.
- Review information from committees of the Board on their activities.
- Approval of Undertaking's authorised signatories.
- Authorising individuals to grant powers of attorney.

Corporate Governance

- Review and approval of the Undertaking’s overall corporate governance arrangements.
- Consider balance of interests between shareholders, employees and customers.
- Undertake a formal annual review of its own performance, that of its committees and that of individual directors.

Compliance

- Approval of the compliance monitoring programme.
- Responsibility for review and monitoring of Treating Customers Fairly (TCF) across the business.

Other

- Approval and settlement of material litigation matters.
- Approval of schedule of matters reserved to the Board.
- Any decision likely to have a material impact on the Undertaking from any perspective, including, but not limited to, financial, operational, strategic or reputational.

B.1.5 Role of CEO

The Board appoints a CEO.

The CEO is the most senior executive officer and has ultimate executive responsibility for the Undertaking's operations, compliance and performance. The CEO is a director of the Undertaking. The CEO is the main link between the executive and the Board. The CEO has certain authorities delegated to him by the Board.

In conjunction with the Chairman of the Board, the CEO is responsible for agreeing the remuneration of the independent non-executive directors.

The Executive Management is responsible for the day to day running of the Undertaking and is led by the CEO.

B.1.6 Board committee structure

The purpose of a committee of the Board is to provide more detailed oversight of particular areas of the Undertaking’s activities.

The Board has oversight of all committees of the Board and ensures and documents that all members of any committees of the Board have the necessary skills, knowledge, expertise and time to fulfil that role. Minutes of all committees of the Board are distributed to the Board either at a Board meeting or via Board Vantage. The Board documents and provides any necessary training to those members to ensure they have, and maintain, the necessary skills and experience.

The current committees of the Board are:

- Audit Committee; and
- Risk Committee.

The Audit Committee

The purpose of the Audit Committee includes to assist the Board in fulfilling its statutory and fiduciary responsibilities relating to the external reporting of financial information, internal controls and the independence and effectiveness of internal and external audit.

The role of the Audit Committee, its membership, frequency of meetings and reporting requirements are set out in the Terms of Reference of the Audit Committee as approved by the Board.

The Board Risk Committee

The purpose of the Board Risk Committee (BRC) includes the responsibility for oversight and advice to the Board on the current risk exposures of the Undertaking and its future risk strategy. The BRC advises and makes recommendations to the Board on the following:

- risk appetite and tolerance for future strategy (taking into account the Board's overall risk appetite, the current financial position of the Undertaking and, drawing on the work of the Audit Committee and the external auditor, the capacity of the Undertaking to manage and control risks within the agreed strategy);
- the system and programme of risk management with the aim of identifying, measuring, controlling and reporting risks;
- the alignment of strategy with the Board's risk appetite; and
- promoting and embedding a risk awareness culture within the Undertaking.

The BRC also oversees the risk management function.

The role of the BRC, its membership, frequency of meetings and reporting requirements are set out in the Terms of Reference of the Board Risk Committee as approved by the Board.

B.1.7 Main roles and responsibilities of key functions

This section details the roles and responsibilities of the Chief Investment Officer and the four mandatory 'key functions' of Internal Audit, Compliance, Risk Management and the Actuarial function.

The role of the Chief Investment Officer

The following duties and responsibilities are delegated to the Chief Investment Officer of the Undertaking by the Board:

- assist the Board in fulfilling its statutory and fiduciary responsibilities relating to the oversight of investment management for the Undertaking;
- formulate and recommend to the Board for its approval the strategic investment policy of the Undertaking;
- approve Asset Liability Management (ALM) /Investment Guidelines and inform the Board of any changes;
- receive and review quarterly performance and position reports and raise with the Board any material issues arising;
- monitor investment portfolio asset holdings to ensure compliance with the ALM/investment and regulatory guidelines;
- approve appointments and terminations of investment managers and advisors and approve any investment management agreements;
- monitor and review the performance of investment managers and advisors;
- approve limits for seed capital on external funds;
- approve list of counter parties and credit institutions for investment; and
- approve investment asset classes available for investment.

The role of Head of Internal Audit

The Head of Internal Audit reports to the Chairman of the Audit Committee. The Head of Internal Audit is responsible for:

- leading the performance of all audit activities across the Undertaking;
- providing input and challenge to management regarding the effectiveness of risk management and internal control processes across the Undertaking;
- evaluating the design and operating effectiveness of the Undertaking's policies and processes;
- performing consulting and advisory services related to governance, risk management and control processes;
- developing, presenting and executing appropriate risk-based audit plans in accordance with MetLife's global audit methodology, including presenting quarterly plans for review and approval by the Audit Committee;
- providing timely reports to the Audit Committee regarding the outputs of planned audit activities, including progress against agreed management action plans;

- attending, presenting at, and issuing reports to the appropriate governing bodies, including the Audit Committee, the BRC and other committees as appropriate;
- providing the Audit Committee and the broader management team with an understanding of Internal Audit's methodology and approach;
- ensuring that the Internal Audit team is appropriately resourced in terms of skills and experience to undertake planned audit activities;
- assisting the Audit Committee in meeting its fiduciary responsibilities;
- maintaining open, constructive and cooperative working relationships with regulators, including the CBI; and
- developing and maintaining an effective working relationship with the external auditors.

The role of Head of Compliance

The Head of Compliance is a member of the Undertaking's Executive Management and reports to the CEO. The Head of Compliance is the executive officer with primary responsibility for ensuring that the Undertaking remains compliant with applicable laws, requirements and regulations and with the Undertaking's Compliance Policies, Procedures and Programmes.

The role of Chief Risk Officer (CRO)

The CRO is a member of the Undertaking's Executive Management and reports to the CEO. The CRO is a director of the Undertaking. The CRO's primary responsibility is to the Board. The CRO reports to the Board periodically and has direct access to the Chairman. The CRO reports to the BRC on a regular basis. The CRO chairs the Executive Risk Committee.

The CRO is the senior executive officer with responsibility for the risk management function and for maintaining and monitoring the effectiveness of the Undertaking's risk management system.

The role of the Head of Actuarial Function

The Head of Actuarial Function is a member of the Undertaking's Executive Management and reports to the Chief Finance Officer (CFO). The role relates to the delivery of actuarial services to the Undertaking and comprises responsibilities for general management input to the Undertaking, administration of the actuarial function, and statutory duties set out in legislation (subject also to regulation and professional guidance).

Actuarial services generally relate to the determination of technical provisions (for all accounting bases) and required capital, and the provision of advice in relation to capital management, underwriting, reinsurance and investment.

B.1.8 Material changes

Over the reporting period, there were no material changes to the system of governance of the Undertaking.

B.1.9 Remuneration

The Undertaking adopts the remuneration policy and practices determined by MetLife Inc. The Undertaking's Board is responsible for ensuring that in adopting the policy that it is in line with the risk strategies of the Undertaking and that it is consistent with and promotes sound and effective risk management. The Undertaking's Board provides oversight of the remuneration policy and practices and ensures that these do not promote excessive risk taking.

Remuneration Policy

MetLife's compensation program is designed to:

- provide competitive total compensation opportunities that will attract, retain and motivate high-performing employees;
- align compensation plans with its short-term and long-term business strategies;
- align the financial interests of the executives with those of its shareholders through stock-based incentives and stock ownership requirements; and
- reinforce the pay for performance culture by making a meaningful portion of total compensation variable, and differentiating awards based on company and individual performance.

MetLife uses a competitive total compensation structure that consists of base salary, annual incentive awards and stock-based long-term incentive award opportunities.

Variable remuneration for eligible MetLife associates is determined by a combination of grade/seniority, individual performance and Group performance. There are appropriate measures in place to promote prudent and effective risk management and avoid promoting excessive risk taking.

The Undertaking does not provide supplementary pension schemes (i.e. superior conditions for some individuals) or early retirement schemes for members of the Board or other key function holders.

B.1.10 Material transactions with related parties

Material transactions with shareholders

On 21 November 2018, MetLife EU purchased the 7% minority shareholding from American Life Insurance Company to become the sole owner of the Undertaking.

On 6 December 2018, the Undertaking paid a dividend of €15.3m to its immediate parent, MetLife EU.

Other intra group balances and transactions are set out in sections A.5.1.

Material transactions with persons who exercise a significant influence on the Undertaking

There were no material transactions with any persons who exercise a significant influence on the Undertaking over the reporting period.

Material transactions with members of the Board

There were no material transactions with members of the Board over the reporting period.

B.1.11 Adequacy of system of governance

The Executive Management and the Board regularly review the adequacy of the system of governance as a whole and in selected areas, to confirm it remains adequate for the Undertaking's needs, and to prioritise areas of improvement. There were no major changes required to the system of governance during 2018 as a result of these reviews.

MetLife

B.2 Fit and proper requirements

B.2.1 Fit and proper policy

The Undertaking's Fitness and Probity Policy (the Policy) sets out the minimum standards, in compliance with the CBI Fitness and Probity Standards and relevant legislation. It is there to ensure that a person, who is known as a 'Responsible Person', has the necessary qualities and competencies in order to allow him/her to perform the duties and carry out the responsibilities of his/her position within the Undertaking. The qualities and competencies relate to the integrity demonstrated by a Responsible Person in personal behaviour and business conduct, soundness of judgement, a sufficient degree of knowledge and experience and appropriate professional qualifications.

Compliance with the Policy is mandatory for the Undertaking and its branches. Specifically, the Policy sets out and describes the approach for assessing and monitoring individuals' fitness and probity.

Definitions

- Pre-Approval Controlled Functions (PCFs): The specific Controlled Functions (CFs) are set out in Schedule 2 of the Regulations. Persons appointed to a PCF must be approved in writing by the CBI, prior to their appointment.
- CFs: Specific functions as set out in the Regulations. Persons performing these functions include the persons who exercise a significant influence in the affairs of the Undertaking, monitor compliance or perform functions in a customer facing role. In determining whether an individual is performing a CF, the Undertaking assesses the role and responsibilities of the person in line with the relevant regulatory requirements.
- Regulations: Central Bank Reform Act 2010 (Sections 20 and 22) Regulations 2011 as amended.
- Responsible Person: Any person performing one or more CF role.

Assessment of fit and proper

The Undertaking does not permit a person to perform a CF unless it is satisfied on reasonable grounds that the person complies with the standards described below and has obtained confirmation from the person that he/she agrees to abide by the standards.

The standards provide that a Responsible Person must be:

- Competent and capable;
- Honest, ethical and act with integrity; and
- Financially sound.

The Undertaking has in place appropriate procedures to maintain a register of all Responsible Persons (the Register) and a record of all due diligence undertaken in respect of such Responsible Persons.

Notification is made to the CBI (to the extent required) following any change to the Register arising either from the appointment, resignation, retirement, removal or material change in the responsibilities of a Responsible Person's role.

The notification to the CBI is carried out by Compliance following a review of the fit and proper assessment and completion of an individual questionnaire, if required based upon the event in question.

Fitness criteria

In determining a Responsible Person's competence and capability for performing their role, assessments may include, but will not be limited to:

- Whether the person satisfies the relevant training and competence requirements, which may be satisfied by evidence of qualifications (e.g. diplomas, degrees and professional memberships) and capability appropriate to the corresponding position description.
- Whether the person has demonstrated by experience that they are able, or can reasonably be expected to be able, to perform the intended function. Employment and reference checks may be used to establish such ability.

Probity criteria

In determining a Responsible Person's honesty, integrity and reputation for performing his/her role, the following factors may be considered, among others:

- Has the person been convicted of any criminal offence, whether or not presently of record; (particularly relevant being any offence involving dishonesty, fraud, financial crime or other offences under legislation relating to companies, building societies, industrial and provident societies, credit unions, friendly societies, banking and or other financial services, insolvency, consumer credit companies, insurance, and consumer protection, money laundering, market manipulation or insider dealing)?
- Has the person had any adverse finding against him/her or settlement in civil proceedings, particularly in connection with investment or other financial business, misconduct, fraud or the formation or management of a body corporate?
- Has the person had personal involvement in any investigation or disciplinary proceeding resulting in sanction or adverse finding with any requirements or standards of any supervisory bodies/ regulatory authorities, clearing houses and exchanges, professional bodies, or government bodies or agencies?
- Has the person been involved as a Responsible Person with a company, partnership or other organisation that has been refused registration, authorisation, membership or a licence to carry out a trade, business or profession, or has had that registration, authorisation, membership or licence revoked, withdrawn or terminated, or has been expelled by the CBI or government body or agency?
- Has the person been refused the right to carry on a trade, business or profession requiring a licence, registration or other authority as a result of the removal of the relevant licence or registration?
- Has the person served as a director, partner, or chief executive of a business that has gone into insolvency, liquidation or administration while personally connected with that organisation or within one year after that connection?
- Has the person been investigated, disciplined, censured, suspended or criticised by a supervisory body/regulatory authority, professional body, government body or agency, a court or tribunal, whether publicly or privately, with which such Responsible Person has been involved?
- Has the person been dismissed or resigned, upon request, from employment or from a position of trust, fiduciary appointment or similar capacity while holding a position as a Responsible Person?

The aforementioned criterion will be considered in relation to a person's ability to perform the relevant CF. In addition, checks to ensure compliance with laws and regulations must include appropriate legal review.

Frequency of Assessment

A person proposed to perform a CF will be assessed prior to appointment and before any contract is signed.

All Responsible Persons will be reassessed on an annual basis as set out in the Undertaking's Human Resources (HR) procedure documents and in accordance with the relevant legislation. Notwithstanding the above, if a Responsible Person becomes aware of a material change in his/her circumstances that could affect his/her fit and proper assessment, he/she is required to notify the Head of HR without delay.

B.3 Risk management system including the Own Risk and Solvency Assessment (ORSA)

B.3.1 Risk management structure

The Risk Management Framework (the Framework) sets out the approaches to risk management and structure to be followed by all associates in their capacity as executives, management and staff.

The key objectives of the Framework are to:

- Promote a strong risk culture in the Undertaking, rooted in the Undertaking's purpose and values, in particular customer protection;
- Ensure consistent, systematic management of risks across all businesses, operations and risk types; and
- Enable decision makers to direct the Undertaking's resources to attractive business opportunities that are within the Board's risk appetite.

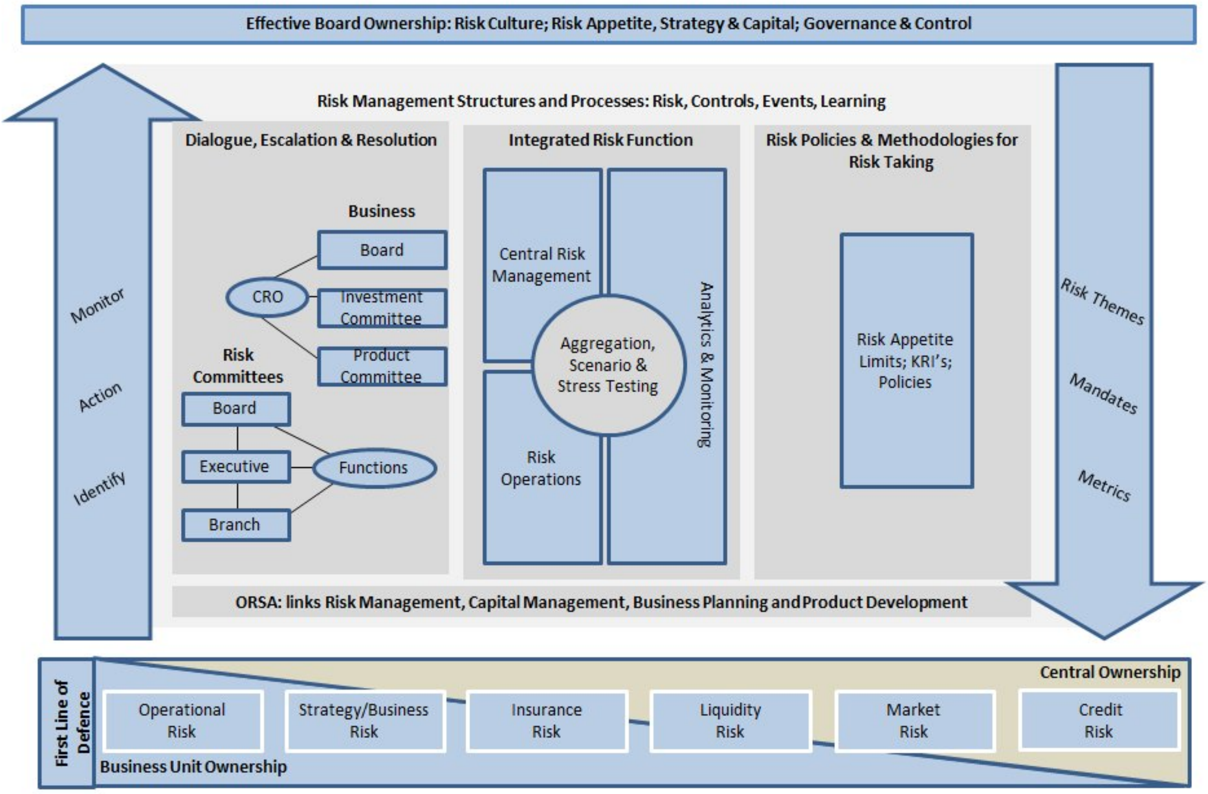
Scope and application

All business activity and decisions are made in the context of, and in compliance with, the Framework, which should also be read in the context of the Undertaking's Risk Strategy and Appetite and associated policies. Every associate is sufficiently familiar with the Framework as is relevant to their role, and exercises sound judgement to act within the Framework in their daily work. It is the responsibility of management to ensure that they have the capability, resources and knowledge to operate within this Framework and exercise their duties under it.

Risk governance

In its mandate to support MetLife Group's strategy in Europe, the Undertaking is active in diverse segments, markets and products. Decisions are made and implemented across borders; and business environments are the result of, for instance, different histories as the Undertaking has integrated other entities. The Framework is designed to facilitate, on an on-going basis, the systematic management of risks consistent with this specific situation, by integrating risk management into business practices and decision mechanisms at the appropriate levels of the Undertaking.

Figure: The Elements of the Undertaking's Risk Management Framework



The Board owns the Undertaking's Risk Appetite and Strategy. In defining this, consideration is given to the existing and potential opportunities to develop and grow the business, and the Undertaking's capacity to absorb losses. In addition, as part of MetLife Group, the Undertaking's risk appetite takes strategic direction from MetLife's 'Enterprise Risk Appetite', as defined by the MetLife Inc. board, and cannot go beyond it in any dimension.

The Undertaking adopts the 'three lines of defence' governance model to ensure that the overall risk profile of the Undertaking remains within the risk appetite as mandated by the Board. The Undertaking's "three lines of defence" have independent reporting lines into the Board, and provide the Board with the assurance of strong governance and controls for every decision that impacts the risks the Undertaking faces.

The first line of defence

The managers of all business and operations areas, as the first line of defence, are responsible as risk owners for ensuring that all risks in their respective areas and any relevant interfaces with other areas are justified by business goals, and that all risks are appropriately managed and controlled within the Framework. In particular, it is the responsibility of the relevant department manager to identify, measure, manage, monitor and report all risks in an area according to the Framework and the Risk Appetite and Strategy.

The Finance Function is key to risk measurement. It measures and monitors financial valuations, flows and projections; ensures appropriate accounting procedures and authorities; and regularly reports to the Board. The Head of Actuarial Function regularly reports independently on valuation assumptions and uncertainties.

The second line of defence

The Risk Management, Compliance and IT Risk and Security Functions fulfil the second line of defence, advised by the Legal Function, by providing the enterprise-wide, comprehensive and consistent systems, techniques and processes to aggregate, assess and limit the risks the Undertaking faces across different areas. In particular, the Risk Function utilises risk quantification models such as Economic Capital, recommends risk appetite and limits, and provides support in the management of key risks.

The third line of defence

Internal Audit provides independent assurance over the strengths of controls as the third line of defence. Internal Audit examines and evaluates the adequacy and effectiveness of controls with a risk-based focus, and performs special reviews and investigations as directed by the Audit Committee and Executive Management.

Dialogue, escalation and resolution

A number of interacting committees provide the structure for the dialogue regarding risk exposures. This includes escalation of risks that cannot be managed within a confined area of the organisation and resolution of conflicts between different decision makers, in particular where questions of risk appetite are concerned.

At an executive level, the Undertaking has established the following Committees: the Executive Management Committee (EMC), the Executive Risk Committee (ERC) and the Product Management Committee (PMC); and in each branch, there is a Branch Executive Committee (BEC) and a Risk, Audit and Compliance Committee (RACC). There are also RACCs specifically for the FOS Business (FOS RACC) and the Head Office functions (HO RACC).

Executive Risk Committee (ERC)

The ERC reports regularly to the BRC, and is chaired by the CRO. The ERC monitors and reports to the BRC the current overall risk profile, key risks and risk metrics, including the solvency position of the Undertaking, and its dynamics, against the Board's stated risk appetite. It steers the operation of the Risk Management Framework and monitors, reviews and makes recommendations to management relating to risk issues facing the Undertaking. The ERC also makes recommendations to the BRC regarding risk appetite, policies etc. and also sets technical limits in line with the approved risk appetite.

Risk, Audit and Compliance Committees (RACCs)

RACCs report into the ERC and are established for each branch, the FOS business, and the HO functions, to review and approve the identification and assessment of all risks, losses, issues and near misses within its remit; approve the relevant controls and action plans, for existing and new businesses, product and distribution arrangements; and to provide general oversight to risk management within its area. The RACCs also monitor and review the metrics assigned to them for monitoring by the ERC. RACC meetings are scheduled to ensure timely information flow between the RACCs and the ERC.

One of the branch/FOS RACCs' primary responsibilities is to identify, monitor, assess and manage Operational and Conduct Risks, where the RACC ensures that these can be suitably integrated into the Undertaking-wide risk management programme. For Insurance Risks, Credit Risk, Market/ALM Risks and Liquidity Risk, the branch RACC supports the identification and monitoring in particular of exposures linked to products and distribution arrangements.

The branch general managers have a leading role in each RACC (and the Head of Operations in the HO RACC) in ensuring high-quality meetings through their example and authority. The RACC should be chaired by a person nominated by the CRO.

Other Committees

Reserving Committee

The Reserving Committee is a sub-committee of the Audit Committee and reviews the basis of Solvency II reserving, including assumptions and methodology. The CRO chairs the Reserving Committee.

Product Management Committee (PMC)

The PMC assists the executive function of the Undertaking in relation to the creation and ongoing review of the Undertaking's products and reinsurance programmes. While not a 'Risk' committee, the PMC plays an important 'first-line' role in the approval of products, oversight and governance of the suite of products and the management of product related risks, in particular insurance risk but also credit and market risks originating from product features.

The CRO is a member of the PMC.

Reinsurance Committee

The Reinsurance Committee is a sub-committee of the PMC. The purpose of the Reinsurance Committee is to maintain oversight of the Undertaking's reinsurance operations and to assist the PMC in relation to any reinsurance arrangements to be entered into (including any amendments) or terminated by, or on behalf of, the Undertaking.

Executive Management Committee (EMC)

The CRO is a member of the Undertaking's EMC, where the Undertaking's strategic direction is decided, and its implementation is monitored.

Branch Executive Committee (BEC)

Each branch has a BEC which is chaired by the branch general manager, and together with the RACC forms part of the primary governance structure for each branch. Other working or steering groups may be established, however these should be concentrated on operational matters, with key decisions in terms of governance being referred to the BEC and RACC, as appropriate.

The branch risk manager is a member of and/or attends the BEC, which is responsible for ensuring that the branch establishes and maintains such systems and controls as are appropriate to its business. In particular, the BEC, together with the RACC, ensures the effective implementation of risk and compliance management within the branch. Under specific circumstances, the CRO can temporarily approve an alternative branch executive to represent risk management in the BEC.

Risk Management Function

The Risk Function operates an enterprise-wide, comprehensive system to identify, aggregate, measure and report risks across the Undertaking, and assesses how the full range of risks and their interaction impact the Undertaking's aggregate solvency, liquidity, earnings, business, customers and reputation.

The Risk Function leverages MetLife's Group Risk Management Function for the challenge and support, and escalates risks and issues as required.

Activities of the Risk Function

The Risk Function carries out the following key activities:

- Risk Monitoring and Analytics.
- Risk Governance and Reporting.
- Embedding of the Risk Management Framework in the business units (branches and FOS business).
- Operational risk management processes, e.g. management of the risk register.
- Leading the ORSA process, analysis and reporting.

Risk policies and methodologies

The Board approves policies and other documents providing binding direction and guidance used in the Undertaking to regulate risk exposures. All business activity and decisions in which an element of risk is present must be taken in the context of, and in compliance with, the Risk Strategy and Appetite document and such further policies.

It is the responsibility of all relevant individuals to be familiar with the contents of the policies, where appropriate, and to exercise sound judgement to act within the policies in their daily work.

The policies are to be adhered to in all circumstances. Implementation of the policies and monitoring of ongoing compliance is primarily the responsibility of the Heads of Function and is overseen by the relevant committee. In particular, policy breaches should be reported to the ERC, and as appropriate to the BRC and Board.

Risk Management policies are developed where necessary to regulate the management of specific risks and provide a consistent Framework for the management of risk in line with Risk Strategy and Appetite, and should be read and reviewed in the context of Risk Strategy and Appetite. They establish minimum standards, allocate responsibilities to ensure that these standards are upheld, and articulate the Undertaking's approach to risk management for a risk type, the key risk management processes, detailed limits, the governance approach, and reporting requirements.

The Board reviews the risk policies at least annually, amending them to reflect current best practice and changes in regulatory requirements. In the annual review process, each policy is reviewed with and by the Undertaking, with the appropriate challenge from the Risk Function. Any material change is not effective until approved by the Board either directly or via the BRC.

Following approval, the Risk Function circulates the Risk policies and communicates changes with the business. The Risk Function intranet page is a central location from which all Business Functions, including branches, can access the Risk policies. Approved policies are presented to the RACCs for noting and implementation. On a quarterly basis, the RACCs monitor and challenge the implementation of appropriate Risk policies within the Undertaking to ensure ongoing compliance.

B.3.2 Risk strategy and appetite

The Undertaking's risk appetite is set in the context of both its overall business objectives and its risk strategy. The Undertaking takes certain financial and insurance risks as a strategic objective, but as a consequence of its activities is also exposed to operational and other risks. The Board is responsible for the Undertaking's overall risk profile, and in particular sets the risk appetite.

The Risk Appetite is operationalised through quantitative limits set out in the appendices of the Risk Strategy and Appetite policy. These limits define both the medium-term risk appetite, and the range for permissible deviations over the short term. Further risk limits and guidelines on how to comply with risk appetite in each class are set out in the respective individual risk policies (Credit, Market, Liquidity, Insurance and Operational).

Management is responsible for defining the metrics in line with the business and the risk appetite set out in the Risk Strategy and Appetite. The ERC is responsible for approving any changes in the metrics that are proposed in between scheduled reviews. Any such approved changes are notified to the BRC and the Board. Additional limits can be set by agreement between the respective risk owners and the CRO.

Risk management strategies by category of risk

The material risks to which the Undertaking are exposed are insurance risk, credit risk, market risk, liquidity risk, operational and business risk and strategic risk.

Credit risk

The Undertaking is exposed to credit risk, i.e.:

- Another party's failure to perform its financial obligations to the Undertaking, including failure to perform them in a timely manner (default risk);
- Increasing doubts over another party's ability to meet its financial obligations (migration risk); or
- Increases in the discounts markets apply to the value of obligations with default risk (spread risk).

Credit risk of the Undertaking's cash deposits and general-account investments is managed by the Undertaking's Treasury and Investment Functions, and overseen by the Board. The credit risk of other counterparties, such as distributors, large clients etc. is the responsibility of the respective business unit and where material to the Undertaking's risk profile is overseen by the appropriate Risk Committee on an exception basis.

Market risk
The Undertaking is exposed to market risk, including interest rates due to timing differences of asset and liability cash flows, and basis differences between valuation rates, different currencies and credit spreads.

Market risks are primarily mitigated through duration targets specified in the Investment Guidelines. Exposure to changes in credit spreads is mitigated by investing in a diversified and high-quality investment portfolio. The Chief Investment Officer and PMC oversee the management of the Undertaking's market risks.

Liquidity risk
The Undertaking is exposed to liquidity risks where it is obliged to settle liabilities at short notice, and is unable to liquidate assets or only with very significant haircuts. Given the nature of its business, there are only very few areas in which liquidity risk can arise. These risks are mitigated by investing in a diversified, high-quality, liquid investment portfolio and a strong forecasting process. This process identifies liquidity needs in both stressed and non-stressed market conditions.

Liquidity risk management is managed by Treasury and overseen by the Board.

Insurance risk
The Undertaking is exposed to unanticipated fluctuations in the timing, frequency and severity of insured events relative to expectations, arising, for instance, from premium and reserve risk.

These are identified and assessed as part of the product development process, in which appropriate underwriting, sales and administrative conditions are defined for all risks associated with the insurance policies over their whole life cycle.

The business units develop insurance products and underwrite risks in line with approved standards. Each insurance class needs to be approved by the Board prior to any business being underwritten. The Board can delegate its authority to approve products to management if they do not have the potential to change the Undertaking's risk profile materially. The Undertaking's aggregate insurance risk is overseen by the PMC.

Operational and business risk
Operational risk arises from unexpected loss due to inadequate or failed internal processes, people and systems, or from external events (including legal risk). Specifically, conduct risk relates to losses, typically from supervisory intervention, caused by misconduct in the insurance market, such as mis-selling or product design that is unsuitable for the intended client.

Business risk is the possibility a company will have lower than anticipated profits, influenced by numerous factors, including sales volume, lapses, sales and maintenance costs, competition and achievable margins.

Operational and business risk is intricately tied to the overall management of a business and is therefore the responsibility of each business unit. Operational risk also arises in the Undertaking's HO functions, such as Finance, Actuarial, etc. Each function is responsible for the management of operational risk in their respective area. The Risk Management Function provide oversight as part of the Enterprise Risk Self Assessment (ERSA) process.

Strategy Risk
Strategy Risk is defined as failure of elements of a chosen strategy, leading to financial loss or foregone expected profits. A particular aspect of Strategy Risk is a withdrawal of capital and liquidity sources that the Undertaking relies upon in the execution of its strategy.

Strategy risk is primarily owned in each business unit, and the Undertaking's Executive Team owns the risk of the Undertaking's overall strategy.

B.3.3 ORSA

ORSA Process

The ORSA is a bespoke strategic analysis which links together all pillars of Solvency II and all areas of the the Undertaking. It enables the Board to understand the risks faced, and how they translate into capital needs or alternatively require mitigation actions.

The ORSA process is an ongoing and continuous process, of which the annual report is a complete board-level roundup at a point in time providing a meaningful and useful report to the Board. The results of the ORSA process and the insights gained in the process provide input into risk management, long-term capital management, business planning and product development and design and allow the Undertaking to:

- Assess the link between the Undertaking's Risk Management Framework, business plan, risk profile, and capital planning, including dividend payments.
- Understand the level at which the Risk Management Framework influences the decision making process.
- Establish the ORSA as a tool that allows the identification, measurement, management, monitoring and reporting of risk, which is embedded in the Undertaking's management processes, under the direction of the Board.
- Provide insight into the development of the balance sheet and the drivers of volatility.
- Confirm appropriate risk appetite limits, including the normal operating range for capital;
- Inform commercial decisions and assess key projects and solutions to meet customer needs.
- Describe the approach by which the Undertaking meets all relevant regulatory requirements in relation to stress testing and scenario analysis.
- Assess the Undertaking's overall solvency needs prospectively, providing analysis of the Undertaking's ability to remain a going concern.
- Monitor compliance with regulatory capital requirements on a continuous basis, allowing for changes in risk profile and stressed conditions, and the quality and loss absorbing capacity of own funds.
- Produce results that are integrated into long term capital planning, own funds allocation, business planning, product development and design, and governance.
- Describe the approach by which the Undertaking incorporates all key results and findings from stress testing and scenario analysis into the capital management and planning approach and business decision making approaches.

The ORSA process is significantly dependent on the key interactions between the processes (i.e. business planning and stress testing) in order to obtain the results which provide senior management and the Board with comfort that there are adequate solvency levels, i.e. the regulatory capital requirements are achieved and within the risk tolerance limits.

The Board are heavily engaged with the ORSA process at all stages. Key stages of the Board's involvement in the ORSA process are as follows:

- Early in the year, the Board reviews the ORSA Board engagement plan for the year and agrees the stress and scenario tests;
- Over the course of several meetings during the year, the Board reviews the overall solvency needs output, including information on the risk profile, the draft solvency projections, the assessment of the appropriateness of the standard formula and the own view of capital. During these sessions, the Board engages in active challenge of the results, which may include requesting further analysis, stress tests and scenarios, investigation of management actions or specific information to be added to the ORSA report;
- Towards the end of the year, the Board reviews the final ORSA report for approval. At the end of each ORSA cycle a "lessons learned" exercise takes place to identify any potential improvements to be applied to future ORSA cycles.

The ORSA Steering Committee, which is chaired by the CRO, directs the ORSA process. The quantitative output is prepared by the ORSA Process Delivery Team, which includes representatives from multiple teams across Finance, Actuarial and Risk. Various other functions and Subject Matter Experts across the organization also provide inputs to the ORSA process.

The ORSA process captures all the material risks that the Undertaking faces or may face in the future that may impact meeting its obligations. The business planning process feeds directly into the ORSA. The business plan links to capital management and solvency is stressed to ensure robustness over a five year horizon.

Material risks identified within the ORSA process for which it is not considered appropriate to hold a capital buffer are addressed by identifying contingency plans.

Risk Appetite forms a key part of the ORSA providing a link between the capital and risk management processes. It underpins the management and monitoring of key risks and helps shape management information and executive decision making. The Undertaking's overall solvency needs are assessed taking into account the Undertaking’s specific risk profile, approved risk tolerance limits and business strategy. This assessment represents the Undertaking’s own view of its risk profile and capital needs and other means needed to appropriately address these risks.

The ORSA process is conducted in its entirety at least annually and without delay following any significant change in the risk profile of the Undertaking and this is reviewed and approved by the Board following the recommendations of the BRC. There will be certain events that may require the process to be run on an ad hoc basis. Such events may follow from internal decisions and external factors.

The Undertaking has processes in place to ensure that the required documentation is produced to an appropriate standard. For each ORSA, the ORSA guidelines require three reports - a record of the ORSA process, an ORSA internal report and an ORSA supervisory report are produced. A single report may be produced to meet the requirements of the three reports. Supplementary documentation may be produced to support the official record and provide additional information to internal stakeholders.

In the last reporting period the Undertaking performed one ad-hoc ORSA process, which explored the impact of commencing sales of a line of Accident & Health products via FOS.

Own Solvency Needs

The Undertaking determines overall solvency needs taking into account the Undertaking’s specific risk profile, approved risk tolerance limits and business strategy. This assessment represents the Undertaking’s own view of its risk profile and capital needs and other means needed to appropriately address these risks.

The Undertaking expresses the overall solvency needs in quantitative terms and complements the quantification by a qualitative description of the risks. The process undertaken ensures that the capital management activities and the risk management system are interlinked and that all key decision making processes are aligned with the ORSA process.

The ORSA assessments to date indicate that the Undertaking is adequately capitalised.

B.4 Internal control system

B.4.1 Internal controls

The Undertaking's Control Framework promotes the importance of having appropriate internal controls and ensuring that all associates are aware of their role in the internal control system. The Control Framework sets out clear standards for the design, operation, validation and oversight of the system of Internal Control. It defines how effective internal control is achieved through joint responsibilities of the general managers and the Heads of Functions.

The Control Framework defines control activities as the policies and procedures that mitigate the Undertaking's risks to the expected level. Control activities can be preventative, corrective, detective or directive, and include a range of activities as diverse as authorisations, segregation of duties and required approvals, verifications, reconciliations, reviews of operating performance, documentation, and security of assets.

All key controls are registered with the associated risks in the Undertaking's risk register, and managed as part of that process to validate their effectiveness and address identified weaknesses. Ongoing monitoring occurs in the ordinary course of operations.

Both the Heads of Functions and the branch general managers have visibility of the control effectiveness and any deficiencies in their areas. The scope and frequency of independent validation depends primarily on an assessment of risks and the effectiveness of ongoing monitoring procedures. Internal control deficiencies including loss events and near misses are reported, with material incidents escalated to the relevant Risk Committee.

B.4.2 Key procedures

The Undertaking's control environment comprises an extensive catalogue of controls that are defined for each function, and include the following:

Control Name	Description
Approval and Authorisation	Approval/authorisation is the confirmation or sanction of employee decisions, events or transactions based on a review by the appropriate management personnel.
Business Resumption	Controls that ensure that business operations can resume in the event of disaster or IT outage. These controls include Business Continuity (BCP) and Disaster Recovery (DR) Planning, BCP/DR Testing, system back-up and data retention.
Code of Accounts Structure	Controls to ensure that the design of the general ledger or subledger account codes assists in minimising errors and allow for effective data capture and reporting.
Documentation	Controls are in place ensuring decisions, exceptions, transactions, and other events are substantiated through documentation. This control includes confirmations, notices and/or disclosures that are required to be sent to clients on a periodic or annual basis.
Hiring/Selection	The hiring and selection process includes a due diligence and escalation process in connection with information received as a result of a background check conducted on an individual candidate who is seeking registration, appointment or a license with the Undertaking.

Control Name	Description
Input Form Design, Edits, and Validations	Controls that ensure the completeness, accuracy, and/or integrity of data input into information systems. These controls include business rules built into the design of system interfaces to reduce the probability of data input errors, (e.g. required fields, acceptable values, etc.), input data validation against known or expected values (e.g. tolerances etc.), or verifying the integrity and origin of data (e.g. digital signatures, hard-copy signatures, etc.).
Physical Safeguarding Mechanisms	Controls that protect the Undertaking's assets through direct measures such as locks on doors, bars on windows, use of safes to secure valuables, and other similar techniques.
Policies & Procedures	There are policies and procedures describing the Undertaking's policies for operation and the procedures necessary to fulfil the policies. There are also reference aids or resources available which employees can refer to assist them in fulfilling their job responsibilities.
Process Monitoring	Management monitoring controls that ensure business processes within the Lines of Business meet their business objectives. These controls may include reviewing transaction error reports, reviewing compliance with applicable laws/regulations (e.g. monitoring the status of claims to ensure turnaround times comply with regulatory time standards), conducting quality assurance reviews, rejecting duplicate transactions, financial statement reviews, etc.
Reconciliations/ Comparisons	Control techniques that ensure that two or more data sets/elements match, for example reconciling bank accounts, comparisons of subledger totals to control accounts, comparisons of data transfer record counts, etc.
Segregation of Duties	Controls segregating tasks or processes to reduce the risk of accidental errors and/or fraud.
Strategic Monitoring and Governance	Management monitoring controls that ensure Lines of Business meet their strategic objectives. These controls include short and long-term range planning, organisational design/staffing, key performance indicator reviews, risk management, enterprise architecture, data governance, knowledge management, etc.
System Access Approval and Monitoring	Controls are in place over the authorisation, identification and authentication of associate access to IT Resources. Minimally, access to systems or data is formally approved and access is periodically reviewed for appropriateness.
System Change Control	Controls are in place to ensure changes to IT systems are reviewed to ensure they meet the needs of the Undertaking, perform as expected, and do not create security vulnerabilities. These controls could include unit testing, performance testing, user acceptance testing, vulnerability testing, etc.
System Data Encryption	Controls are in place to ensure sensitive data is encrypted in Undertaking systems. Encryption controls and other methods of safeguarding data are used in at-risk IT assets such as laptops, smart phones/blackberry's and back-up tapes to prevent unauthorised data access and/or disclosure of confidential or sensitive information.
System Monitoring and Response	Controls that ensure the technology environment is monitored for security incidents, processing abends, system outages, etc. and that appropriate actions are taken based on the results.
System Security Configurations	Security configurations at the software, infrastructure, hardware, or network layers that ensure the confidentiality of data.
Third-Party Monitoring	Controls that ensure that third-parties are operating in accordance with agreements and contracts and deviations are acted upon by management.
Training/Communication	Controls are in place to ensure that employees, at all levels, are provided with training activities that comply with regulatory requirements regarding training on products, services, procedures, rules and standards, as applicable. The organisation has communicated its values and standards to employees, suppliers, customers and other relevant stakeholders. There is a process to update and communicate these standards and related training regularly.

Control Name	Description
Validity/Existence Tests	Controls that validate the existence of assets. Examples include physical inventory counts to determine that quantities and descriptions of goods and/ or supplies on hand are accurate, fixed asset inventories to validate the existence of items represented in the accounts, and other similar processes.

B.4.3 Description of Compliance Function

The Compliance Function is an important part of an effective internal control system and the three lines of defence model. In this regard, the Undertaking is committed to having in place an effective compliance risk management programme (MetLife Compliance Risk Management (CRM) Programme) wherever it does business and is guided by its core values, appropriate rules, structures, processes, training, documentation and controls to help prevent, detect and remediate compliance breaches and deficiencies. The aim of the CRM programme is to help management be reasonably assured that effective processes are in place to ensure adherence to applicable laws and regulations. It also ensures that any compliance issues uncovered by the programme are appropriately addressed and that ownership of the compliance risks and mitigating actions are assigned to business process owners.

The CRM Programme consists of the following key elements:

- Compliance Risk Identification and Prioritisation;
- Compliance Risk and Control Assessments;
- Monitoring and Testing Programme; and
- Policies and Procedures.

The Board has overall responsibility for setting and overseeing compliance arrangements in the Undertaking. Management has responsibility for maintaining compliance with all applicable laws and regulations and the commitment and support of management is an essential component of a successful compliance programme. The core role of the Compliance Function is to standardise, document and provide assurance to the management of the Undertaking, and ultimately to the relevant regulators, that the Undertaking is operating within the letter and the spirit of the legal and regulatory framework. The Compliance Function reports to the Undertaking's Executive Committee/BRC and ultimately to the Board.

The Compliance Function performs the following actions on an annual basis:

- In line with the CRM Programme, identification and assessment of compliance risk, including but not limited to, the completion of compliance monitoring and testing to ensure independent oversight and review of policies and procedures.
- Regulatory Development (in line with the Regulatory Development Policy):
    - Advising senior management, in conjunction with the Legal Function, on compliance with applicable laws and regulations;
    - Assessing the possible impact of changes in the regulatory environment on the operations of the Undertaking.
- Providing an Annual Compliance Plan, including a Testing and Monitoring Plan for approval from the Board.
- Supporting a robust training programme to ensure all staff are fully up to date with and understand all aspects of compliance rules and regulations.
- Reviewing compliance procedures and controls on a regular basis.
- In addition, the Head of Compliance is also responsible for providing compliance oversight of the Compliance Function in all branches of the Undertaking.

B.5 Internal Audit Function

B.5.1 Internal Audit

Internal Audit is an independent assessment group established within the MetLife Group as a service to management and to the Audit Committee of the Board. Its mission is to protect and enhance organisational value by providing risk-based assurance, advice and insight.

Internal Audit's purpose is to provide on-going objective and independent evaluations of the adequacy and effectiveness of internal controls. It may also perform consulting advisory services and special reviews as directed by the Audit Committee and Executive Management.

Roles and Responsibilities of Internal Audit

The scope of Internal Audit includes activities that provide reasonable assurance on:

- Whether internal controls throughout the Undertaking are operating as intended, including whether controls provide reasonable assurance that transactions are executed in accordance with management authorisation, that they are properly recorded, and that assets are effectively safeguarded.
- If the financial reporting process used to prepare the Undertaking's statutory and GAAP financial statements is operating effectively.
- Whether the management reporting system provides reliable and timely information.
- Compliance with Undertaking policies and procedures.
- The effectiveness of the organisation's risk management processes.
- New key systems and procedures prior to implementation or when there is a major change in an existing key system.
- The risk exposures relating to the organisation's governance, operations, and information systems regarding the achievement of the organisation's strategic objectives.

Internal Audit is also involved in:

- Performing consulting and advisory services related to governance, risk management and control as appropriate for the organisation.
- Reviewing new key systems and procedures prior to implementation or when there is a major change in an existing system.
- Assisting the Audit Committee of the Board in exercising their fiduciary responsibilities, and apprising the Board, through the Audit Committee, of any significant developments warranting their consideration or action.
- Evaluating and investigating allegations and the possibilities of fraud, and other inappropriate transactions, in coordination with other departments.
- Recommending the appointment and evaluating the performance of the Undertaking's external auditor, negotiating the fees to be paid, securing the Audit Committee's pre-approval in accordance with established policy, and maintaining oversight and coordination on the scope and scheduling of the Undertaking's external audits.
- Monitoring and evaluating the effectiveness of the Undertaking's risk management processes.
- Participating in management discussions that involve the development or modification of operating policies, or the system of internal controls.
- Maintaining liaisons with appropriate external professional organizations and keeping informed on new developments in the field of auditing.
- Performing certain Sarbanes Oxley controls testing in coordination with other departments.

Internal Audit maintains a strong relationship with the Undertaking's external auditor. The Chief Auditor regularly reviews the coordination between both organizations. Regular meetings are held to discuss and coordinate audit activities to minimize duplication, maximize value, and set appropriate scopes for planned work.

Internal Audit process

The Chief Auditor shall define the annual and long-term objectives of Internal Audit. Within the framework of these objectives, Internal Audit shall, at least annually, formally document their risk assessment methodology, prepare an audit plan, and prepare an expense budget. Such plans include:

- A risk assessment of all key business processes
- A schedule of audits based upon the results of the risk assessment
- A proposed budget which documents the level of resources and expenses that need to be committed to provide adequate audit coverage for the audit plan
- Flexibility to respond to special requests of senior management on a timely basis

The Chief Auditor shall review Internal Audit's planned activities for the coming year with senior management and the Audit Committee. The scope of this activity shall also be reviewed with appropriate management in each line of business. Any significant deviation from the approved internal audit plan will be communicated to the Audit Committee through periodic activity reports.

Reporting Structure

Results and conclusions of Internal Audit work are reviewed with management directly responsible for the activity being evaluated, and such other management as deemed appropriate. The purpose of reviewing results is to reach agreement as to the facts presented by Internal Audit and to make management aware of Internal Audit issues before the report is released.

B.5.2 Independence

In order to maintain independence and objectivity, Internal Audit does not prepare any accounting and related records or engage in any relevant activity requiring audit review, including the development or installation of new systems, policies or procedures. The review of new systems or procedures prior to implementation is not considered an impairment of independence and objectivity.

B.5.3 Authority

Internal Audit shall have full and unrestricted authorisation to access all records, personnel, and physical property relevant to the performance of their assignment in any functional area of the Undertaking and, where contractually authorised, its contractors or suppliers. All employees are requested to assist Internal Audit in fulfilling its roles and responsibilities. Documents and information given to the Internal Audit Department shall be handled in the same prudent and confidential manner as by those employees normally accountable for them.

B.5.4 Performance

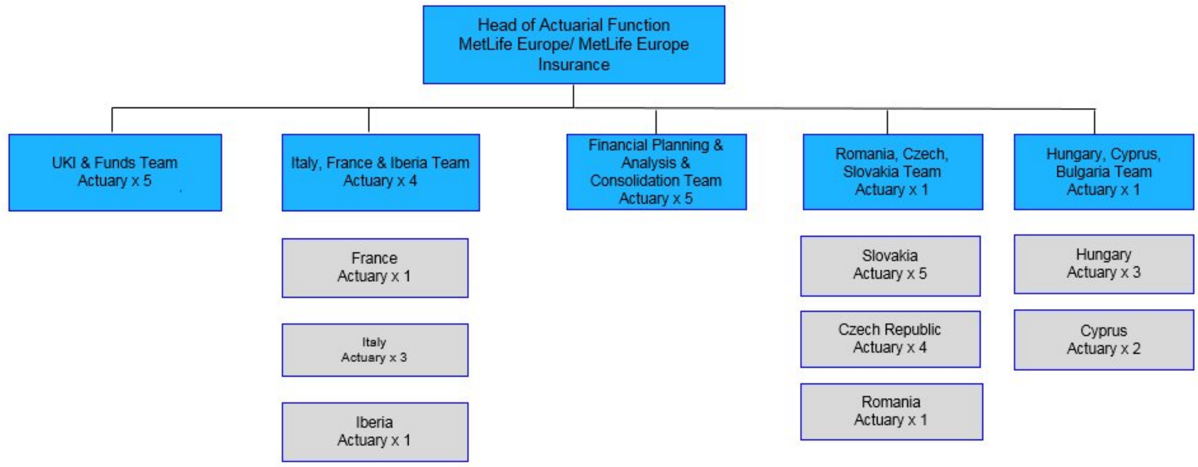
Internal Audit shall exercise due professional care in the performance of audits and other work. The Institute of Internal Auditors (IIA) has established standards ("Standards") for the professional practice of Internal Auditing. The Standards apply to individual internal auditors and to internal audit activities. All internal auditors are accountable for conforming with the Standards related to individual objectivity, proficiency, and due professional care. In addition, internal auditors are accountable for conforming with the Standards that are relevant to the performance of their job responsibilities. The Chief Auditor is responsible for ensuring that audit work conforms with those Standards. The IIA has also established a Code of Ethics. Each auditor is responsible to conduct him or herself so that their good faith and integrity are not open to question.

B.6 Actuarial Function

The Actuarial Function is responsible for the following key deliverables within the Undertaking:

- Production of the (External) Annual "Actuarial Function Report" covering the following matters (alternatively some of these may be provided separately):
  - Report on the technical provisions;
  - Opinion on the technical provisions;
  - Opinion on underwriting;
  - Opinion on reinsurance;
  - Description of the activities of the Actuarial Function over the year.
- (Internal) Quarterly memo to management providing analysis of the Solvency II balance sheet, and support for sign-off (and supporting the ORSA stipulation for continuous compliance with the requirements for technical provisions);
- (Internal) Annual report to the Board on the actuarial assumptions;
- (Internal) Contributions to risk management notably the ORSA, including inputs to the choice of stresses and scenarios, and documented quality control over the projections themselves; and
- (External) Actuarial opinion on the ORSA.

Note that the prefix "Internal" / "External" refers to whether the documentary outputs correspond directly to external requirements or are internal ways to support the external requirements. For example, the assumptions report is not required separately by external requirements, but, given that the assumptions are clearly a key element of the technical provisions, there needs to be suitable supporting documentation.



The Actuarial Function consists of the Actuarial Analysis team (as outlined in the above chart - this reflects a snapshot of the team as at 31 December 2018 excluding contractors supporting projects). The Actuarial Production team produces valuation results which are subsequently passed to the Actuarial Analysis team for analysis and review before final sign off by the Head of Actuarial Function. Beyond its Solvency II duties as Actuarial Function, the Actuarial Analysis team also contributes to a range of financial reporting and management activities.

B.7 Outsourcing

B.7.1 Outsourcing policy

The Undertaking outsources a range of activities in the countries it is active in, particularly in the areas of policy administration, IT, and treasury services, in order to benefit from expertise and efficiencies not practically available internally. Each outsourcing arrangement has a functional owner in the senior team who is responsible for the management and first line oversight of the arrangement. The Procurement function co-ordinates all activities across functions.

All outsourcing is subject to the requirements of the Outsourcing Policy, which ensures that all outsourcing arrangements are subject to appropriate due diligence, approval, written agreements and on-going monitoring, and that the risks associated with entering outsourcing arrangements are effectively managed. The Outsourcing Policy applies to all outsourcing agreements and covers the requirements for both external outsourcing and Intra-group outsourcing.

B.7.2 Details of outsourcing (including critical or important outsourcing)

The Undertaking operates on a partially outsourced model, which means that certain services (including certain critical or important activities of the actuarial, compliance, risk management, IT services and internal audit functions) are provided by the following MetLife group service companies:

- MetLife Europe Services Limited, MetLife Innovation Centre Limited and MetLife Services EEIG for Ireland jurisdiction

It is worth noting that during 2018, the Undertaking announced that certain finance and actuarial activities would transfer from Ireland to an existing Centre of Excellence in India and new Centres of Excellence in Poland and Malaysia in 2019. These centres form part of MetLife Services EEIG.

In addition, the Undertaking benefits from group services such as investment services from MetLife companies based in the UK and USA, and IT services from MetLife companies based in the USA.

In addition, the Undertaking externally outsources the following critical or important functions / activities:

Critical or important outsourced function / activity	Jurisdiction
Complaint handling	Multiple jurisdictions (Ireland, Netherlands, Norway, Poland, Germany, Portugal, Italy and France)
Storage of policyholder data and policy servicing	Multiple jurisdictions (Ireland, Netherlands, Norway, Spain, Poland, Germany, Portugal, Romania, Italy and France)
Claim handling	Multiple jurisdictions (Ireland, Netherlands, Norway, Spain, Poland, Germany, Portugal, Slovakia, Romania, Italy and France)
Storage of data	Multiple jurisdictions (All Undertaking branches)
Inbound services (Inbound mails and Document management)	Multiple jurisdictions (France, Spain, Portugal and Italy)

B.8 Any other information

The information provided in the sections above provide a comprehensive and complete description of the Undertaking's system of governance and its continuing adequacy for the Undertaking.

C Risk profile

C.1 Underwriting risk

C.1.1 Material exposures

The Undertaking's primary focus is on the provision of ILOE cover as an add-on to MetLife Europe d.a.c.'s core life insurance offerings. The Undertaking also provides a small book of MPI and travel insurance business.

Underwriting risk refers to fluctuations in the timing, frequency and severity of insured events relative to the expectations of the Undertaking at the time of underwriting, arising as a consequence of writing business where financial outgo depends upon loss of employment, and lapse experience. This also includes the potential for expense overrun relative to pricing assumptions, and includes the consequences of writing new business in volumes or mix different to those anticipated.

The Undertaking is exposed to underwriting risks in its businesses, including premium and reserve risk. These risks are identified and assessed as part of the product development process, in which appropriate underwriting conditions are defined for all underwriting risks associated with the insurance policies over their whole life cycle.

There has been no material change in exposure to underwriting risk over the reporting period.

C.1.2 Material risk concentrations

The Undertaking predominantly writes ILOE business in Italy. ILOE cover complements a credit package for covering loans, recurrent debts or providing income protection. The benefit payable is the installment of the credit or the monthly recurrent debt. Due to the Italian business volumes, one of the primary insurance risks to which the Undertaking is exposed, is a large increase in Italian unemployment rates. This majority of this risk is reinsured.

C.1.3 Material risk mitigation practices

Underwriting risks are primarily mitigated through reinsurance, diversification and through limits and guidelines which are monitored by the PMC. The Undertaking regularly reviews the emergence of any potential counterparty concentration, with the team responsible for the monitoring being independent of the underwriting and sales functions.

As outlined in the previous section, one of the primary insurance risks to which the Undertaking is exposed, is a large increase in Italian unemployment rates. The claim rates are mostly flat in Italy versus varying unemployment rates, demonstrating the impact of Cassa Integrazione Guadagni (CASSA), which is unique to Italy. The CASSA acts as a “shock absorber' where employees, instead of being dismissed, keep their employment contract in force and are paid while they are looking for another job or being trained to develop their skills to maybe return to their former company. Employees are recognised as unemployed only if all efforts to find them a new job or to get their former job fail. Employees may stay up to 12 months in CASSA. The impact of CASSA is to dampen the impact of an increase in unemployment rates on the Undertaking's experience.

ILOE performance, including claims experience and labour statistics, are monitored on a quarterly basis.

C.1.4 Material risk sensitivities

As required by the calculations to determine the SCR using the Standard Formula (SF), the Undertaking determines the impact of increases in expected loss rates, and pandemic events. The following table shows the sensitivity in the Undertaking's capital requirements if a 1 in 200 year event (as measured by the SF) happened for each risk category.

	31-Dec-18
	€'000
Premium and Reserve risk	**11,201**
Lapse risk	**2,722**
Non-Life CAT risk	**5,986**

Premium and reserve risk measures the risk that the actual underwriting experience differs from the experience expected at the time of pricing. This risk is a large component of the Undertaking's SCR, due to the type of products sold by the Undertaking which result in premiums that include significant commission payments.

Lapse risk arises due to the expected future profits on the Undertaking's business.

Catastrophe risk measures the change in the Undertaking's insurance liabilities due to extreme or exceptional events.

C.2 Market risk

C.2.1 Material exposures

The Undertaking does not take on market risk as a strategic risk. The Undertaking seeks to incur only minimal market risk exposure as arises from its insurance business. The Undertaking is exposed to market risks, including interest rates due to timing differences of asset and liability cash flows and basis differences between valuation rates, different currencies and positions held to facilitate policyholder transactions. In line with the Prudent Person Principle, the Undertaking invests in assets whose risks can be properly identified, measured, managed, controlled, reported and appropriately taken into account as part of the ORSA process.

The exposure to market risks has not changed significantly over the course of the reporting period.

C.2.2 Material risk concentrations

Market risks are concentrated to the interest rates and investment markets of the Undertaking's major functional currencies, including Euro and the Romanian Leu.

C.2.3 Material risk mitigation practices

Market risks are primarily mitigated through the Undertaking's investment limits and guidelines. The investments must be made in accordance with the general principles set out in Undertaking's Strategic Investment Policy. In addition, investments must be made in accordance with the guidelines as approved by the Board which provides detailed limits on permissible sector exposures.

C.2.4 Material risk sensitivities

As required by the calculations to determine the SCR using the SF, the Undertaking determines the impact of changes in interest rates, currency values (against the Euro), equity levels, and credit spreads. The following table shows the sensitivity in the Undertaking's capital requirements if a 1 in 200 year event (as measured by the SF) happened for each material risk category. The Undertaking has no material exposure to equity risk or property risk.

	31-Dec-18 €'000
Interest rate risk	923
Currency risk	1,453
Concentration risk	507

The Undertaking does not have material exposures to market risk, due to the investment strategy in place and the short term nature of the products being sold.

Currency risk SCR has increased during the period due to movements in non-euro cash and non-invested assets and liabilities which are denominated in Romanian Leu, United States Dollar and Polish Zloty. Concentration risk SCR has also increased slightly, due to an increase in the value of investments held with one single counterparty during the period.

The estimated impact on net investment income in the IFRS Statement of Comprehensive Income of a one percentage point increase in yield curves is €1.1 million (2017: €1 million).

C.3 Credit risk

C.3.1 Material exposures

The Undertaking is exposed to credit risks (i.e. the risk of a value decrease of assets or increase of liabilities due to the default of third parties, or the increase of the probability of such a default and/or the associated loss). Exposure to credit risk comes from the investment portfolio, reinsurers and other counterparty receivables.

The exposures to credit risks have remained relatively stable over the reporting period.

C.3.2 Material risk concentrations

The Undertaking maintains a highly diversified, well rated investment portfolio and routinely monitors and limits credit exposures at counterparty and aggregate level.

Material reinsurance arrangements are with highly rated reinsurers and/or are appropriately collateralised.

C.3.3 Material risk mitigation practices

Credit risks are primarily mitigated through asset allocation, diversification and single-exposure limits. For counterparty exposures, the Undertaking may require the placement of collateral.

C.3.4 Material risk sensitivities

As required by the calculations to determine the SCR using the SF, the Undertaking determines the impact of changes in credit spreads and a potential extreme loss of counterparty exposures which are set out in the following table. The following table shows the sensitivity in the Undertaking's capital requirements if a 1 in 200 year event (as measured by the SF) happened for each risk category.

	31-Dec-18 **€'000**
Spread risk	**1,553**
Counterparty default risk	**2,940**

The investment portfolio is exposed to credit spread movements, whilst counterparty default risk exposures arise primarily from reinsurance arrangements and third party receivables. All credit risk exposures are mitigated as described above.

C.4 Liquidity risk

C.4.1 Material exposures

The Undertaking is exposed to liquidity risks where it is obliged to settle liabilities at short notice and assets cannot be liquidated at all or only with very significant haircuts.

Management of liquidity risk to ensure that the Undertaking can, at all times, meet its liabilities as they become due, forms a key part of the Undertaking achieving its business objectives and meeting its regulatory requirements. Proper management of liquidity risk is mirrored in the Undertaking's management of credit risk and market risk, which significantly reduce the risk of contagion from credit risk and market risk.

The exposures to liquidity risks have remained stable over the course of the reporting period.

The Undertaking's investments are typically highly liquid. In its assessment of liquidity, the Undertaking can also take into account the cash inflows and outflows from its insurance business. The total amount of the expected profit included in future premiums (EPIFP) as calculated in accordance with Article 260(2) was €1.5m as at 31 December 2018.

C.4.2 Material risk concentrations

In line with Investment Guidelines, the Undertaking maintains a highly diversified portfolio and limits the exposure to individual obligors. Concentrations can arise where the Undertaking's liquidity needs are triggered by individual events. Liquidity stress testing is carried out to ensure that sufficient liquidity would be available in such events.

C.4.3 Material risk mitigation practices

Liquidity risks are primarily mitigated through asset allocation, diversification and single-exposure limits, and by avoiding entering obligations to provide liquidity to counterparties.

The Undertaking specifies quantitative and qualitative limits on its liquidity risk exposures, including specific risks that the Undertaking is not willing to accept.

C.4.4 Material risk sensitivities

The Undertaking performs regular stress tests of its liquidity position in adverse events, including significant and abrupt changes in financial markets and policyholder behaviour. These stress tests consider the timing of obligations and the ability to liquidate assets over different time horizons, as well as the impact of such liquidations on realised values.

C.5 Operational risk

C.5.1 Material exposures

The Undertaking is exposed to operational risk consistent with other financial institutions, including the impact of changes in the regulatory and legal environments, the dependency on multiple internal and external operators (for investment activities as an example) and complex modelling for financial reporting and solvency reporting. Operational risks are identified and assessed with regards to their frequency and potential impact as part of the risk management process, in which risks and controls are documented by risk owners and validated by the Risk Management Function. As the Undertaking continues to evolve operationally, it aims to maintain a stable operational risk environment over the plan horizon.

C.5.2 Material risk concentrations

The Undertaking prefers to concentrate activities in focused and tightly-controlled operations and ensures that operations have independent review, alternative back-up sites, and business continuity plans.

C.5.3 Material risk mitigation practices

Operational risks are primarily mitigated through functional controls, which are integral elements of the Undertaking's Risk Framework and independently validated on a regular basis.

C.5.4 Material risk sensitivities

Each operational risk is rated regarding frequency and potential impact on an inherent basis (i.e. before effective control) and on a residual basis (i.e. taking into account effective controls) to create a current risk heat map. Control remediation action plans are put in place as and when required.

C.6 Other material risks

In addition to the risks covered above, the Undertaking may in the future also be exposed to emerging risks. The Undertaking currently considers geopolitical risk, disruptive technology (including transformative technology for insurance distribution ('InsurTech') and cybersecurity issues) and regulatory changes on data protection and business conduct that can transform the insurance industry, as key emerging risks.

C.7 Any other information

The Undertaking has a strategic role to support MetLife Europe d.a.c., therefore its success depends upon the success of this entity. The Undertaking reviews its risk exposures regularly and considers potential actions to align exposure to risk appetite.

D Valuation for solvency purposes

D.1 Assets

Basis of valuation

The valuation of assets for Solvency II has been determined in line with the Solvency II Directive and related guidance.

Unless expressly stated in the notes below, the Undertaking has valued its assets at fair value. In order to establish the fair value of assets, the following guiding principle has been applied:

- Assets are valued at the amounts for which they could be exchanged between knowledgeable willing parties in an arm's length transaction.

The determination of fair value of financial assets, which comprise substantially all of the assets of the Undertaking, is set out below.

Fair value of financial assets with active market

When available, the fair value of financial assets is based on quoted prices in active markets that are readily and regularly obtainable. These are the most liquid of the Undertaking's financial assets, and valuation of these assets does not involve management's judgement.

Fair value of financial assets with no active market

When developing fair values, where quoted prices are not available, the Undertaking uses one of three broad valuation techniques or a combination thereof: (i) the market approach, (ii) the income approach, and (iii) the cost approach.

The significant inputs to these valuation techniques are inputs that are observable in the market or can be derived principally from, or corroborated by, observable market data. When observable inputs are not available, inputs that are not observable in the market or cannot be derived principally from, or corroborated by, observable market data, are used. These unobservable inputs are based in large part on management's judgement or estimation, and cannot be supported by reference to the market activity. Even though these inputs are unobservable, management believes they are consistent with what other market participants would use when pricing such financial assets, and are considered appropriate given the circumstances. Actual results may differ materially from these estimates.

Such estimates are reviewed on an ongoing basis, and any difference recognised in the period in which the estimate is revised if the revision affects only that period, or in the period of the revision and future periods if the revision affects both current and future periods.

For deposits within one year of the balance sheet date, the Undertaking believes that the fair value is represented by the amounts realisable, on account of their short term nature.

The following table shows the assets of the Undertaking as reported in the Balance Sheet QRT SE. 02.01.16 under Solvency II, and comprises figures produced under both Solvency II and in the Undertaking's financial statements. The financial statements have been prepared in accordance with IFRS.

Assets of the Undertaking as at 31 December 2018

Assets	Solvency II value	Reclassification differences	Valuation differences	IFRS value
	€'000	€'000	€'000	€'000
Deferred acquisition costs	—	—	6,363	6,363
Intangible assets	—	—	1,410	1,410
Deferred tax assets	42	—	122	164
Government Bonds	7,358	(136)	—	7,222
Corporate Bonds	26,583	(200)	—	26,383
Collective Investments Undertakings	43	—	—	43
Deposits other than cash equivalents	8,463	(7,424)	—	1,039
Reinsurance recoverables	18,272	(1,577)	45,481	62,176
Insurance and intermediaries receivables	9,569	—	(293)	9,276
Reinsurance receivables	—	1,578	—	1,578
Receivables (trade, not insurance)	4,054	336	819	5,209
Cash and cash equivalents	23,228	7,423	—	30,651
Total Assets	97,612	—	53,902	151,514

The Solvency II liabilities are compared to the IFRS liabilities in section D3. The valuation differences between the Solvency and IFRS excess of assets over liabilities is set out in section E.1.2.

The items on the Solvency II and IFRS balance sheet may be disclosed in different categories. The ‘reclassification’ column above includes such amounts where there is a different classification between Solvency II and IFRS. There is no net bottom line reclassification difference between the assets in this section and the liabilities in section D3.

MetLife

D.1.1 Deferred acquisition costs

Under Solvency II, deferred acquisition costs (DAC) do not represent a recognisable asset. Cash outflows on acquisition are expensed when incurred.

Under IFRS, the costs incurred during the financial year that are directly attributable to the successful acquisition of new business are deferred to the extent that they are expected to be recoverable out of future margins in revenues on these contracts. Accordingly, the two amounts differ on account of the different accounting policies applied.

A portion of the DAC asset held for the Spain business is allocated to an Unearned Commission Asset (UCA) to reflect the clawback arrangement in place for associated commission payments. As commission is earned, it is moved to DAC. The gross UCA is disclosed in other assets and the ceded UCA is disclosed in other payables in IFRS. The UCA is not recognised under Solvency II.

D.1.2 Intangible assets

Intangible assets include those payments made to third party distributors for exclusive distribution rights obtained by the Undertaking.

Under Solvency II, intangible assets are not recognised unless the Undertaking is able to sell the asset for a price derived from an active market. Thus the Undertaking does not recognise intangible assets under Solvency II.

Under IFRS, intangible assets are stated at cost less accumulated depreciation. Intangible assets are recognised if the undiscounted future cash flows exceed the initial cost of the asset. Intangible assets are amortised over its useful life and amortisation methods are either proportional to expected profits or expected premiums. Accordingly, the two amounts differ on account of the different accounting policies applied.

D.1.3 Deferred tax assets

Under Solvency II, deferred tax assets are recognised on the estimated future tax effects of temporary differences, unused tax losses carried forward and unused tax credits carried forward. Deferred tax is only recognised where it is probable that it will be realised, i.e. that future taxable profits will be available against which deductible temporary differences can be utilised. Deferred tax is measured at the tax rates that are expected to apply in the period in which the liability is settled or the asset realised, based on the tax laws enacted or substantively enacted at the reporting date, on an undiscounted basis. When determining whether deferred tax assets can be realised, the Undertaking considers projected future taxable profits in excess of those profits arising from the reversal of existing taxable temporary differences.

Deferred tax assets are not set off against deferred tax liabilities, unless such assets and liabilities have arisen in the same tax jurisdiction, in line with local legislation and practice.

The principles under which deferred tax assets and liabilities are recognised under Solvency II are broadly similar to those under IFRS.

However, there are differences in the carrying value of underlying assets and liabilities, which give rise to temporary differences between carrying value and tax base. Accordingly, the two amounts differ on the balance sheets.

The following table sets out the composition of the deferred tax balances under Solvency II, as at the reporting date, and a comparison against the deferred tax balances under IFRS:

	Solvency II 2018 €'000	IFRS 2018 €'000
Other local deferred items	**(177)**	(177)
Differences between Solvency II and IFRS balance sheet	**(367)**	—
Net deferred tax balance	**(544)**	(177)

All branches are profitable under estimated local tax base. The following branches have net deferred tax assets:

	2018 €'000	2017 €'000
Romania	**38**	—
Ireland	**3**	—
France	**—**	14
Total	**41**	14

The deferred tax asset in Italy was not recognized at year end 2018 for Solvency II or IFRS purposes. This is based on an assessment of the future recoverability of the asset including analysis of historical local taxable profits and projections of future local profits.

D.1.4 Investments

Under Solvency II, investments are stated at fair value except for strategic participations (the Undertaking does not hold strategic participations). Financial assets and liabilities are recognised when the Undertaking becomes a party to the contractual provisions of the instrument. All financial instruments reported at fair value are measured based on an exit price.

The valuation techniques and source of pricing inputs used by the Undertaking for significant categories of investments are produced below:

D.1.4.1 Bonds

Government bonds listed on a recognised exchange are valued using the quoted prices for identical instruments.

Government bonds which are not listed, are principally valued using the market approach. Valuations are based primarily on matrix pricing or other similar techniques using standard market observable inputs including benchmark yields, issuer ratings, broker-dealer quotes, issuer spreads and reported trades of similar instruments, including those within the same sub-sector or with a similar maturity or credit rating. Government bonds for which observable inputs are not available, are principally valued using the market approach. Valuations are based primarily on independent non-binding broker quotations and inputs including quoted prices for identical or similar instruments that are less liquid and based on lower levels of trading activity. Certain valuations are based on matrix pricing that utilise inputs that are unobservable or cannot be derived principally from, or corroborated by, observable market data, including credit spreads.

Corporate bonds listed on a recognised exchange are valued using quoted prices or quoted prices for similar assets.

Corporate bonds which are not listed, are principally valued using the market and income approaches. Valuations are based primarily on quoted prices for similar listed instruments in active markets, quoted market prices for similar listed instruments in markets that are not considered active, or using matrix pricing or other similar techniques that use standard market observable inputs such as benchmark yields, spreads off benchmark yields, new issuances, issuer rating, duration, and trades of identical or comparable instruments. Privately-placed instruments are valued using matrix pricing methodologies using standard market observable inputs and inputs derived from, or corroborated by, market observable data including market yield curve, duration, call provisions, observable prices and spreads for similar publicly traded or privately traded issues that incorporate the credit quality and industry sector of the issuer, and in certain cases, delta spread adjustments to reflect specific credit-related issues.

Corporate bonds for which observable inputs are not available, are principally valued using the market approach. Valuations are based primarily on matrix pricing or other similar techniques that utilise unobservable inputs or inputs that cannot be derived principally from, or corroborated by, observable market data, including illiquidity premium, delta spread adjustments to reflect specific credit-related issues, credit spreads, and inputs including quoted prices for similar instruments that are less liquid and based on lower levels of trading activity. Certain valuations are based on independent non-binding broker quotations.

Under IFRS, bonds are stated at fair value. Accordingly, there are no differences between Solvency II and IFRS.

D.1.4.2 Collective Investments Undertakings

Collective investments undertakings listed on a recognised exchange are valued using the quoted prices provided by the investment managers, that are based on their respective net asset values.

Unlisted investment funds are principally valued based on prices from the investment managers, which are based on European Venture Capital Association Guidelines, including price/earnings ratio based valuation. The prices released by investment managers of the underlying funds are reviewed and where appropriate, adjustments are made to reflect the impact of changes in market conditions between the date of the valuation and the end of the reporting period. The valuation of these investment funds is largely based on inputs that are not based on observable market data.

Under IFRS, collective investments undertakings are stated at fair value. Accordingly, there are no differences between Solvency II and IFRS.

D.1.4.3 Deposits other than cash equivalents

Deposits other than cash equivalents comprise of demand deposits. These are carried at fair value on the Solvency II balance sheet, which are based on the amounts due on demand.

Under IFRS, demand deposits are stated at carrying value which approximates to fair value. Accordingly, there is no difference between the two amounts.

D.1.5 Reinsurance recoverables

Under Solvency II, reinsurance recoverables are valued using the cash-flow projection model similar to that used to calculate the best estimate of liabilities.

The reinsurance recoverables are adjusted for expected defaults using internal assumptions. Further information on the best estimate of liabilities, its valuation methodology, basis and assumptions used can be found in section D.2.

Under IFRS reinsurance recoverables are valued using the same methods used to calculate technical provisions. Accordingly, there are differences between the value of reinsurance recoverables on the two balance sheets.

D.1.6 Insurance and intermediaries receivables

This relates to the amounts due from policyholders, insurance intermediaries and other insurers linked to inward reinsurance business.

Under Solvency II, these are stated at fair value.

Under IFRS, receivables and other assets are recorded at cost less any irrecoverable amounts and are an approximation of the fair value of these assets. Accordingly, there are no differences between Solvency II and IFRS.

D.1.7 Reinsurance receivables

Reinsurance receivables relate to claims and commissions settled but not yet paid by reinsurers.

Under Solvency II, these are stated at fair value.

Under IFRS, receivables and other assets are recorded at cost less any irrecoverable amounts and are an approximation of the fair value of these assets. Accordingly, there are no differences between Solvency II and IFRS, other than those attributable to timing.

D.1.8 Receivables (trade, not insurance)

Under Solvency II, these are stated at fair value.

Under IFRS, trade receivables are recorded at cost less any irrecoverable amounts and are an approximation of the fair value of these assets. Accordingly, there are no differences between Solvency II and IFRS in relation to trade receivables.

See section D.1.1 for details of gross UCA which is disclosed in other assets in IFRS but is not recognised under Solvency II.

D.1.9 Cash and cash equivalents

Cash and cash equivalents are carried at fair value on the Solvency II balance sheet, which is based on the amounts due on demand.

Under IFRS, cash and cash equivalents are stated at carrying value which approximates to fair value. Accordingly, there is no difference between the two amounts.

Bank overdrafts are disclosed in debts owed to credit institutions in IFRS and Solvency II.

D.1.10 Any other information on assets

Estimation uncertainty
The key source of estimation uncertainty arises in deferred tax assets (section D.1.3).

Asset levelling
The following table provides an analysis of financial assets that are measured subsequent to initial recognition at fair value, grouped into Levels 1 to 4 on the degree to which the fair value is observable.

- Level 1: quoted prices in active markets for identical assets;
- Level 2: quoted prices in active markets for similar assets;
- Level 3: inputs other than quoted prices in active markets for identical or similar assets that are observable for the asset directly (i.e. as prices) or indirectly (i.e. derived from prices); and
- Level 4: inputs not based on observable market data.

Asset Category	Level 1	Level 2	Level 3	Level 4	Total Solvency II
	2018	2018	2018	2018	2018
	€'000	€'000	€'000	€'000	€'000
Cash and cash equivalents	23,228	—	—	—	23,228
Corporate Bonds	—	26,583	—	—	26,583
Deposits other than cash equivalents	690	7,773	—	—	8,463
Government Bonds	—	7,358	—	—	7,358
Investment funds	43	—	—	—	43
Total	23,961	41,714	—	—	65,675

All other information has been disclosed in the preceding sections.

D.2 Technical provisions

The technical provisions correspond to the current amount the Undertaking would have to pay if they were to transfer their insurance obligations immediately to another Undertaking. The value of technical provisions are equal to the sum of a best estimate liability and a risk margin. The methodology employed in the calculation of the best estimate liability is covered in section D.2.3 and the risk margin is covered in section D.2.7.

The insurance obligations have been segmented into homogeneous risk groups (HRGs) when calculating the technical provisions. The approach to segmentation is covered in section D.2.1.

The best estimate liability includes two separate components:

- Premium provision, which allows for future benefits and expenses, net of future premiums, is calculated using a discounted cash flows approach, based on best estimated demographic and expense assumptions, and using the prescribed EIOPA yield curve for discounting.

- Provisions for outstanding claims, which include a reserve for claims already reported but not settled (RBNS) and a reserve for claims assumed to have already been incurred but not reported (IBNR).

The above liabilities are calculated gross, without deduction of the amounts recoverable from reinsurance contracts. Such recoverable amounts are calculated separately and are covered in section D.2.4.

D.2.1 Segmentation

Under Solvency II, undertakings should properly segment the business into the lines of business specified in the guidelines. The primary segmentation distinguishes between life and non-life insurance obligations. The distinction does not coincide with the legal definition, but rather with how the contract is pursued on a similar technical basis, i.e. life insurance will be considered a life insurance obligation and likewise non-life will be considered a non-life obligation.

Life business is segmented into seventeen lines of business. The non-life insurance obligations are further segmented into twelve lines of business. In respect of the Undertaking, the following are the only lines of business:

- Miscellaneous Financial Loss; and
- Assistance

Miscellaneous Financial Loss includes ILOE and MPI. Assistance includes Travel Insurance.

D.2.2 Technical provisions split by line of business

Technical provisions split by gross and net of reinsurance

Illustrated below is breakdown of gross and net technical provisions by line of business:

Line of Business	**Gross of Reinsurance 2018 €'000**	**Reinsurance Relief 2018 €'000**	**Net of Reinsurance 2018 €'000**	Gross of Reinsurance 2017 €'000	Reinsurance Relief 2017 €'000	Net of Reinsurance 2017 €'000
Assistance	**101**	**(64)**	**37**	96	(96)	—
Miscellaneous financial loss	**27,024**	**(18,208)**	**8,816**	28,509	(16,806)	11,703
Total Technical Provisions	**27,125**	**(18,272)**	**8,853**	28,605	(16,902)	11,703

Gross technical provisions split by best estimate liability and risk margin

The table below presents the breakdown of gross technical provisions by lines of business into Best Estimate Liability (BEL) and risk margin (methodology is covered in sections D.2.3 and D.2.7 respectively).

Line of Business	**BEL**	**Risk Margin**	**Gross Technical Provision under Solvency II**	BEL	Risk Margin	Gross Technical Provision under Solvency II
	2018	**2018**	**2018**	2017	2017	2017
	€'000	**€'000**	**€'000**	€'000	€'000	€'000
Assistance	**(28)**	**129**	**101**	57	39	96
Miscellaneous financial loss	**23,392**	**3,632**	**27,024**	24,747	3,762	28,509
Total Gross Technical Provisions	**23,364**	**3,761**	**27,125**	24,804	3,801	28,605

Gross technical provisions decreased by €1.5m from €28.6m in 2017 to €27.1m in 2018. Net technical provisions decreased by €2.8m from €11.7m in 2017 to €8.9m in 2018. The change in net technical provisions is driven principally by the following:

- Assumption changes: Assumption updates decreased the technical provisions. This was driven in particular by updates to expense assumptions across all branches (-€0.4m).
- Model changes: There were some updates which reduced the technical provisions, e.g. refinements as to how the reinsurance assets were calculated in Italy (-€0.6m).
- New business, experience & market movements: Changes in relation to new business, actual experience and market movements (e.g. interest rates), and roll forward of the technical provisions on the in-force business (release of cashflows and risk margin, unwind of discount rate). These reduced the technical provisions (-€1.8m).

D.2.3 Best estimate

D.2.3.1 Methodology for the calculation of the best estimate

For all lines of business, the best estimate premium provision corresponds to the probability weighted average of future cash-flows taking account of the time value of money.

D.2.3.2 Cash-flow projections

The cash-flow projections reflect the expected realistic future demographic, legal, medical, technological, social and economic developments over the lifetime of the insurance and reinsurance obligations.

D.2.3.3 Recognition and derecognition of insurance and reinsurance contracts for solvency purposes

The Undertaking observes the process of recognition and derecognition of its insurance obligations in line with the technical specifications, which states:

The calculation of the best estimate only includes future cash-flows associated with recognised obligations within the boundary of the contract. No future business is taken into account for the calculation of technical provisions.

An insurance obligation is initially recognised by insurance undertakings at whichever is the earlier of the date the Undertaking becomes a party to the contract that gives rise to the obligation or the date the insurance cover begins.

A contract is derecognised as an existing contract only when the obligation specified in the contract is extinguished, discharged, cancelled or expires.

D.2.3.4 Time horizon

For all of the calculations of best estimate, a projection period of 50 years has been assumed. This adequately accounts for all material cash-flows in the portfolio.

D.2.3.5 Gross cash-flows

The cash-flow projection used in the calculation of the best estimate takes account of all the cash in-and out-flows required to settle the insurance obligations over the time horizon.

D.2.3.6 Gross cash in-flows

The best estimate includes items such as future premiums and other policyholder payments but does not take into account investment returns. Premiums which are due for payment by the valuation date are shown as a premium receivable on the balance sheet.

D.2.3.7 Gross cash out-flows

The cash out-flows are calculated and include future benefits payable to the policyholders or beneficiaries, expenses that will be incurred in servicing insurance obligations, commissions, benefits and tax payments.

D.2.3.8 Non-Life insurance obligations

The methodology applied by the Undertaking for the calculation of the premium provision and the outstanding claims provisions complies with the Non-Life insurance obligations (Article 36 of the Delegated Acts).

D.2.3.9 Valuation of future discretionary benefits

This is not applicable to the Undertaking.

D.2.3.10 Claims Provision

The outstanding claims reserves are “best estimate” balances common to US GAAP and IFRS and comprise those already RBNS and those IBNR.

For the Undertaking, the computation of RBNS does not generally require complex actuarial techniques, being a simple multiplication of a known benefit amount by a rate of declinature. RBNS is generally calculated by the Operations Function and booked by Finance, subject to consultation with Actuarial on declinature rates. For claims subject to periodic payments over a duration (in particular, payments for ILOE, where the maximum payment period and hence maximum number of payments is defined in the policy provisions), an assumption relative to the average expected number of payments is also used in the calculation of the RBNS reserve for claims reported.

The computation of IBNR does require application of actuarial techniques of moderate complexity, based on extrapolation of historic claims and premiums data (using “claims triangle” or “loss ratio” techniques).

D.2.4 Reinsurance recoverables

The calculation of amounts recoverable from reinsurance contracts follow the same principles and methodology as presented above for the calculation of other parts of the technical provisions (i.e. premium provision and claims provisions respectively).

Where the timing of recoveries for direct payments markedly diverge this has been taken into account in the projection of cash-flows. Where the timing is sufficiently similar to that for direct payments the timing of direct payments has been used.

The amounts recoverable have been calculated consistently with the boundaries of the insurance contracts to which they relate.

The expenses incurred in relation to the management and administration of reinsurance contracts are allowed for in the calculation of the best estimate.

The amounts recoverable (excluding those related to RBNS and IBNR) from reinsurance contracts are adjusted to take account of expected losses due to default of the counterparty. This adjustment is calculated separately and is based on an assessment of the probability of default of the counterparty and the average loss-given-default.

Reinsurance recoverables related to the outstanding claims reserves are not adjusted for the probability of the default of the reinsurance counterparty. While this represents an exception to the prescribed approach from the regulations, the impact of using an alternative approach has been assessed and found immaterial for the claims provisions of the Undertaking.

D.2.5 Discounting

General

Reinsurance recoverables related to the outstanding claims reserves are not discounted. While this represents an exception to the prescribed approach from the regulations, the impact of using an alternative approach has been assessed and found immaterial for the claims provisions of the Undertaking, in light of the short duration of the business.

Illiquidity premium

This is no longer relevant under Solvency II.

D.2.6 Calculation of technical provisions as a whole

The calculation of technical provisions as a whole is not applicable to the Undertaking.

D.2.7 Risk margin

The risk margin is calculated by line of business and is then added to the BEL in order to obtain the technical provisions by line of business. The risk margin is calculated by:

- Projecting the non-hedgeable SCR components at each future time period, using appropriate risk drivers;
- Aggregating the projected non-hedgeable SCR components using the prescribed correlation matrices;
- Taking a charge of 6% per annum on the run-off of the SCR; and
- Discounting those amounts at the risk-free rates.

D.2.8 Approximation of technical provisions

Technical provisions - un-modelled business

Due to modelling or data limitations on certain lines of business, certain components of the BEL are allowed for via un-modelled adjustments (UA) or modelled adjustments (MA). The basis for the UA or MA will vary from item to item.

Technical provisions - Paid-Up option

The Undertaking does not currently model the option to make policies paid up.

The paid up option is not available to the Undertaking, since the majority of this business is single premium (SP) and the regular premium business does not provide cover if the premium is not paid.

The Undertaking models surrender payments for SP business as this option is available to clients, where they switch cover to another provider or where there is an early repayment of the underlying loan for ILOE business.

D.2.9 Level of uncertainty associated with technical provisions

Levels of uncertainty associated with technical provisions

In the calculation of technical provisions, it is necessary to make judgements, estimates and assumptions about the carrying amounts of assets and liabilities that are not readily apparent from other sources. The estimates and associated assumptions are based on historical experience and other factors that are considered relevant. Actual results may differ from these estimates.

The estimates and underlying assumptions are reviewed on periodic basis.

Best estimate liability

The premium provision represents the present value of future benefits (events expected to occur in the future) to be paid to the policyholders or on behalf of the policyholders and related expenses less the present value of future premiums.

The key assumptions concerning the future, and other key sources of estimation uncertainty at the reporting date that could impact the valuation of the best estimate liability, are discussed below.

Key assumptions used in calculating the best estimate liability:

- Expected future economic conditions (limited to the risk-free interest rates for the Undertaking);
- Direct per policy maintenance expenses;
- Claims incidence rates based on selected published actuarial mortality tables; and
- Lapse rates based on expected surrender experience.

The reserve for RBNS claims represents a provision for future payments expected in relation to claims already incurred and reported to the Undertaking, and all related expenses.

Key assumptions used in calculating the best estimate RBNS are:

- Claims declinature rate; and
- Expected number of future payments (for claims payable as periodic amounts)

The reserve for IBNR claims represents a provision for future payments expected in relation to claims already incurred but not yet reported to the Undertaking, and all related expenses.

The only key assumptions for this type of provision, limited to cases where an Ultimate Loss Ratio (ULR) approach is used, is the definition of the ULR assumption.

Expert judgement

Expert judgement is necessary in the calculation of the best estimate liability in a number of different ways:

- Selection of data to use, correcting errors and deciding on the treatment of outliers or extreme events;
- Selection of realistic assumptions and the period of data on which such assumptions are based;
- Selection of the valuation technique considering appropriate alternative methodologies;
- Incorporating appropriately in the calculations the environment under which the Undertaking operates its business; and
- Adjusting the data to reflect current or future conditions and adjusting external data to reflect the portfolio.

D.2.10 Matching adjustment

This is not applicable to the Undertaking.

D.2.11 Volatility adjustment

This is not applicable to the Undertaking.

D.2.12 Transitional risk-free interest rate-term structure

This is not applicable to the Undertaking.

D.2.13 Transitional deduction

This is not applicable to the Undertaking.

D.2.14 Differences between Solvency II valuation and IFRS

The table and the associated explanations below provide key differences between technical provisions under Solvency II and those presented in the Undertaking's financial statements:

Analysis of Differences	**Miscellaneous Financial Loss 2018 €'000**	**Assistance 2018 €'000**	**Total 2018 €'000**
Gross Technical Provisions under IFRS	**73,287**	**272**	**73,559**
Assumption and Methodology Differences	**(53,895)**	**(328)**	**(54,223)**
RBNS classification differences	**4,000**	**27**	**4,027**
Items in Solvency II not in IFRS (Risk Margin)	**3,632**	**130**	**3,762**
Gross Technical Provisions under Solvency II	**27,024**	**101**	**27,125**

There are many significant differences between the technical provisions in the financial statements under IFRS and the technical provisions under Solvency II.

Assumption and Methodology Differences

Solvency II and IFRS have different rules for classifying/grouping insurance contracts, and these rules affect the valuation of the liabilities.

Solvency II capitalises all future profits, subject to contract boundaries, whereas IFRS generally does not. IFRS valuation adopts a net premium valuation methodology on regular premium business.

Solvency II assumptions are all best estimate whereas IFRS may apply Provisions for Adverse Deviations (PADs) to the assumptions used to value the reserves, according to classification rules.

Items in Solvency II but not in IFRS

Solvency II determines a risk margin based on the concept of the cost of capital (for risks that are not hedgeable), whereas this concept does not generally apply to IFRS (this might be considered as analogous to the PAD under IFRS).

Reclassification

RBNS balances are disclosed in technical provisions in Solvency II but in payables in IFRS.

D.2.15 Information on Actuarial Methodologies and Assumptions

Principal assumptions used in the determination of technical provisions

Solvency II requires assumptions to be based on best estimate. The assumptions are revised on a regular basis to adjust for recent experience and changes to market factors.

The principal assumptions used in the determination of technical provisions are included in this section but do not reflect all assumptions used.

Notes on the Assumptions

1. Demographic Assumptions

Mortality, morbidity and incidence rates (for ILOE business) assumptions are generally based on published tables updated to allow for the results of the experience studies. The published tables are generally country specific, and may be product specific. In many cases the original table will be selected by product and then used also for valuation. In some cases the table will be provided by a reinsurer.

Lapse/surrender/persistency assumptions tend to be Undertaking specific but may be influenced by market data. This is also true of unemployment claim rates particularly relevant to the Undertaking.

2. Expense Assumptions

Expense assumptions are based on the results of the expense studies. They are entirely Undertaking specific, not only in the manner that they reflect the plan expense base of the Undertaking, but also in the way that the Undertaking allocates expenses between acquisition and maintenance and by line of business.

The Undertaking writes primarily ILOE business sold in conjunction with life coverages issued by MetLife Europe d.a.c.

Expense assumptions are therefore determined jointly across both legal entities within the credit line of business, and are applied as a proportion of the relevant premium segmented between the 2 entities.

3. Economic Assumptions

Noting that Solvency II prescribes future capital market economic assumptions to be “risk neutral”, with risk free interest rates published by EIOPA, economic assumptions are effectively limited to expense inflation.

D.3 Other liabilities

Liabilities of the Undertaking as at 31 December 2018

Liabilities	Solvency II value €'000	Reclassification differences €'000	Valuation differences €'000	IFRS value €'000
Technical Provisions - Non-life	27,125	(4,027)	50,461	73,559
Provisions other than technical provisions	73	—	—	73
Deferred tax liabilities	586	—	(245)	341
Insurance and intermediaries payable	19,970	4,027	—	23,997
Reinsurance payables	2,992	—	500	3,492
Payables (trade, not insurance)	4,161	—	—	4,161
Total Liabilities	54,907	—	50,716	105,623
Excess of assets over liabilities	42,705	—	3,186	45,891

The Solvency II assets are compared to the IFRS assets in section D.1. The valuation differences between the Solvency and IFRS excess of assets over liabilities is set out in section E.1.2.

D.3.1 Provisions other than technical provisions

Provisions are recognised when the Undertaking has a present obligation (legal or constructive) as a result of a past event, it is probable that the Undertaking will be required to settle the obligation, and a reliable estimate can be made of the amount of the obligation.

Under Solvency II and IFRS, the amount recognised as a provision is the best estimate of the consideration required to settle the present obligation at the balance sheet date, taking into account the risks and uncertainties surrounding the obligation. Accordingly, there are no differences between Solvency II and IFRS.

D.3.2 Deferred tax liabilities

For further details, please refer to section D.1.3.

D.3.3 Other financial liabilities

Other financial liabilities comprise of insurance and intermediaries payables, reinsurance payables, and payables (trade, not insurance).

Under Solvency II, these are stated at fair value.

Under IFRS, trade payables comprise short-term payables which are recorded at cost and are an approximation of the fair value of these liabilities. Accordingly, there are no differences between Solvency II and IFRS in relation to trade payables.

See section D.1.1 for details of ceded UCA which is disclosed in other payables in IFRS but is not recognised under Solvency II.

D.3.4 Leasing

The Undertaking does not hold any leases.

D.3.5 Employee benefits

A portion of pension costs are allocated from MetLife Services European Economic Interest Group (MetLife Services EEIG), MetLife Europe Services Limited (MESL) and MetLife Slovakia s.r.o (MetLife Services Slovakia) and are not directly paid for by the Undertaking. These allocations are recognised as an expense when incurred and any related accruals are included in intercompany payables. MetLife Services EEIG and MESL make payments at agreed rates of the employee's gross salary for each individual's pension fund, the assets of which are vested in independent trustees for the benefit of the employees and their dependents.

The Undertaking makes other payment directly towards pension plans for employees remunerated at branch level. Contributions towards these plans are recognised as an expense in the income statement. The Undertaking does not operate a defined benefit pension plan.

D.3.6 Risk management

Information on risks relating to underwriting and reserving, asset-liability management, investment risk management and liquidity risk management is set out in section C.

D.3.7 Level of uncertainty associated with other liabilities

Due to the short term nature of the other liabilities obligations, the timing of outflows of economic benefits is known with reasonable certainty.

D.4 Alternative methods for valuation

Information in relation to assets that are not valued using quoted prices is set out in Section D.1.4.1.

D.5 Any other information

All information has been disclosed in the preceding sections.

E Capital management

E.1 Own funds

E.1.1 Capital Management Policy

The strategic objectives of capital management for the Undertaking are:

- Regulatory compliance: to ensure compliance with the Undertaking's regulatory capital requirements;
- Efficient allocation: to manage and allocate capital efficiently to achieve sustainable returns and facilitate growth objectives; and
- Financial strength: to ensure access to capital markets on competitive terms, so that the Undertaking's overall cost of capital is minimised.

Taken together, these strategic goals strengthen the Undertaking's ability to withstand losses from adverse business and market conditions, enhance its financial flexibility and serve the interests of all stakeholders.

Roles and Responsibilities

- The Board has ultimate responsibility for ensuring adequacy of capital for the Undertaking.
- The CEO is responsible for guiding strategy and overall corporate risk appetite and ensuring that the right people are overseeing each function involved in capital management.
- The CFO is responsible for overseeing capital reporting and financial functions, capital allocation, and to cascade the CEO's strategy, including risk appetite, to all relevant financial divisions.
- The CRO ensures the composition and level of the Undertaking's capitalisation supports the Undertaking's Risk Strategy and Appetite. The CRO is responsible for the systems and structures in place to manage and monitor risks.
- The Finance Function has management responsibility for understanding capital consequences of investment strategies and decisions and coordination with relevant Treasury and Finance personnel to ensure that the capital considerations of investment decisions are properly vetted.
- Both the Risk Management Function and Finance Function ensure that adequate reporting is in place and capital requirement policies are followed correctly.

Capital Management Framework

The Board is ultimately responsible for the sourcing, deployment and adequacy of capital (i.e. assets held other than those designated to meet policyholder and other Undertaking liabilities) and places significant reliance on the advice of the CFO and CRO who bear specific professional duties in this regard.

The Undertaking's capital is monitored through the capital management process and within the Undertaking's stated risk appetite limits. Any breaches of these limits is escalated in accordance with and as defined by any relevant regulatory or internal policies.

The Undertaking's risk appetite recognises the regulatory minimum standard, as it applies to technical provisions, own funds and capital under Solvency II, and sets the target ongoing solvency level in order to enable the Undertaking to withstand the financial implications of adverse experience.

Risk Appetite

The Undertaking has developed key risk appetite statements which apply on an on-going basis. The Risk Management Function reviews the Undertaking's actual risk exposure against the overall stated risk appetite on a regular basis, at least quarterly.

The Risk Appetite and Strategy identifies the agreed target solvency level and range for the Undertaking. The appropriateness of the risk appetite is evaluated as part of the Undertaking's ORSA process each year and is subject to change over time.

Where deviations from the defined risk appetite measures occur, the Risk Management Function provides the Board with its opinion of the intensity of the deviation, along with a report on actions taken to address the deviation. Following this, the Board determines the materiality of deviations from the defined Risk Appetite measures, and whether such deviations are to be communicated to the regulator in accordance with CBI requirements.

Capital Planning and Dividend Policy

The Finance Function develops and maintains the medium term capital plan considering the business and risk strategies.

The capital planning process takes into account the following:

- The most recent business plan;
- Material new business;
- Any known management actions that are expected to materially affect the capital position;
- The planned dividend payments and any scheduled capital increases; and
- The outcome of the most recent Solvency II calculations and ORSA results.

Proposed dividends are considered by the Board on a case by case basis taking into account the output of the ORSA, including the expected capital position over a 12 month time horizon and the risks to that capital position, but in any case would not result in the Undertaking going below its overall target solvency level.

Capital and Liquidity Management

The Finance Function has the responsibility of managing the excess of assets over liabilities, per established guidelines. Investment of such capital is subject to the portfolio objective of meeting operating cash flow needs and generating a modest return enhancement above risk-free levels by taking moderate duration exposure and limited credit risk. Investments will generally be selected to minimise currency exposure relative to the relevant base currency.

Investment Guidelines are in place that govern the investment options for all assets owned by the Undertaking.

E.1.2 Reconciliation of equity under IFRS to excess of assets over liabilities under Solvency II

The Undertaking's excess of assets over liabilities (own funds) under Solvency II is different to the shareholders' equity in the financial statements prepared under IFRS. The table summarises the differences at 31 December 2018:

	Section	31-Dec-18 €'000	31-Dec-18 €'000
Assets under IFRS valuation	D.1	**151,514**	
Liabilities under IFRS valuation	D.3	**(105,623)**	
Equity per the IFRS financial statements			**45,891**
· Valuation differences on technical provisions (net)	D.2	**4,980**	
· Write off of deferred acquisition costs	D.1.1	**(6,363)**	
· Write off of intangible assets	D.1.2	**(1,410)**	
· Net unearned commission	D.1.1	**(319)**	
· Net deferred tax	D.1.3	**(367)**	
· Other adjustments		**293**	
			(3,186)
Assets under Solvency II valuation	D.1	**97,612**	
Liabilities under Solvency II valuation	D.3	**(54,907)**	
Excess of assets over liabilities under Solvency II			**42,705**

Valuation differences occur due to different basis used for Solvency II reporting compared with IFRS. See the sections referenced above for details of the valuation differences.

E.1.3 Composition and quality of own funds

The items reported in the own funds are split into three categories depending on different factors such as quality, liquidity and timeline to availability when liabilities arise.

Tier one own funds include ordinary share capital, non-cumulative preference shares and relevant subordinated liabilities. Tier two own funds include cumulative preference shares and subordinated liabilities under a shorter duration. Tier three own funds include own funds which do not satisfy the Tier one or Tier two requirements.

Composition and quality of own funds

All of the Undertaking's own funds are categorised as Tier one (ordinary share capital and share premium related to ordinary share capital) for Solvency II purposes, with the exception of net deferred tax assets of €0.04m (2017: €0.01m) which are categorised as Tier three.

E.1.4 Capital instruments in issue

Instrument	Ordinary share capital
Tier	Tier One
Permanence	Yes
Subordination	Last upon winding up
Redemption incentives	None
Amount in Issue	2,048,388
Mandatory service costs	None
Absence of encumbrance	Yes

E.1.5 Movement in own funds

	31-Dec-18	31-Dec-17	Movement
	€'000	€'000	€'000
Basic own funds			
Tier One	**42,663**	52,491	(9,828)
Tier Two	**—**	—	—
Tier Three	**42**	14	28
Total basic own funds	**42,705**	52,505	(9,800)

The Undertaking has no ancillary own funds.

Total own funds have decreased by €9.8m from €52.5m at 31 December 2017 to €42.7m at 31 December 2018. This is primarily driven by:

- Dividend payment (-€15.3m).
- Business and capital market movements (+€4.5m).
- Model and process updates impacting technical provisions (+€1m).

E.1.6 Eligible amount of own funds to cover SCR and MCR

	31-Dec-18	31-Dec-17	Movement
	€'000	€'000	€'000
Total own funds	**42,705**	52,505	(9,800)
Less:			
Restrictions	**—**	—	—
Deductions	**—**	—	—
Total eligible own funds for SCR	**42,705**	52,505	(9,800)
SCR	**18,873**	18,893	(20)
Solvency Ratio	**226%**	278%	(52)%
Total eligible own funds for MCR	**42,663**	52,491	(9,828)
MCR	**4,718**	4,723	(5)

The Undertaking has no restrictions on eligible own funds.

Loss absorbency

The Undertaking's Tier One own funds are immediately available to absorb losses. They absorb losses if there is any non-compliance with the SCR.

E.1.7 Reconciliation reserve - key elements

Reserve item	**Amount**
	31-Dec-18
	€'000
Excess of assets over liabilities	**42,705**
Own shares (included as assets on the balance sheet)	**—**
Foreseeable dividends, distributions and charges	**—**
Other basic own funds items	**(13,677)**
Adjustment for restricted own fund items of Matching Adjustment Portfolios (MAPs) and Ring Fenced Funds (RFFs)	**—**
Reconciliation reserve before deduction for participations	**29,028**

E.1.8 Transitional arrangements

The Undertaking has not reported transitional arrangements.

E.1.9 Ancillary own funds

The Undertaking does not have ancillary own funds.

E.1.10 Restrictions and deductions from own funds

The Undertaking has no restrictions or deductions from own funds.

E.1.11 Own funds - RFFs

The Undertaking does not have RFFs.

E.1.12 Own funds - Planning and management

The Undertaking's capital projection does not include any repayment of its capital items over the current and projected planning horizon or any plan to raise additional own funds.

E.1.13 Own funds - Forecast

The Undertaking projects its capital requirements over the five year planning horizon used within the ORSA process.

E.2 Solvency Capital Requirement (SCR) and Minimum Capital Requirement (MCR)

E.2.1 Approach to SCR and MCR

Calibration of stresses

For the purpose of this section, the Undertaking has adopted the SF approach. This method uses stresses for each of the individual risks as calibrated by EIOPA. EIOPA also provides the standard correlation matrices for the purpose of aggregation.

Undertaking Specific Parameters (USPs) have not been used by the Undertaking.

Use of Matching Adjustments

This is not applicable to the Undertaking.

E.2.2 Overview of SCR SF calculation

This section details the capital requirements for the Undertaking.

The assessment of the SCR using the SF approach is based on a modular approach consisting of a core of life; non-life; market; health and counterparty default risks with associated sub-modules. These are aggregated in the SF using correlation matrices, both at the sub-module and the main module level. An intangible asset module is then added (uncorrelated) to give the Basic Solvency Capital Requirement (BSCR). The operational risk component and adjustments for risk absorbing effect of future profit sharing and deferred taxes are then allowed for, to give the overall SCR.

Hence, the SCR is calculated as follows:

$SCR = BSCR - Adj + SCR_{op}$

Where

- SCR = The Overall Standard Formula Capital Charge;
- BSCR = Basic Solvency Capital Requirement;
- Adj = Adjustment for Risk Absorbing Effect of Future Profit Sharing and Deferred Taxes; and
- SCR_{op} = The Capital Charge for Operational Risk.

Here, the “delta-Net Asset Value” (ΔNAV) approach is used for capturing the impact of the underlying risk module. Note that the expression ΔNAV has a sign convention whereby positive values signify a loss.

In order to calculate ΔNAV, the base scenario as well as the stressed assets and liabilities will need to be calculated. The cashflows for each of these scenarios is then discounted to determine the corresponding present value of assets and liabilities. The difference between the base and the stressed assets and liabilities is the ΔNAV.

The ΔNAV is based on the Solvency II balance sheet that excludes the risk margin component of the technical provisions (i.e. uses only the best estimate liability component of the technical provisions). Furthermore when calculating ΔNAV the following need to be allowed for:

- Risk Mitigation techniques (primarily reinsurance).
- Behaviour of policyholders (for the Undertaking, this is covered in the use of lapse rates as an assumptions).

The Undertaking has calculated the non-life risk SCR module for its existing business and its expected new business over the next year. Premium risk under the non-life insurance is based on expected premiums for the next twelve months. The stress scenarios for underwriting risks in life insurance and Similar to Life Techniques (SLT) health insurance are instantaneous and do not allow for future new business.

USPs in SCR calculation

The Undertaking is not using USPs pursuant to Article 104(7) of Directive 2009/138/EC.

E.2.3 SCR and MCR results

SCR

The following table includes the SCR components.

	31-Dec-18	31-Dec-17
	€'000	€'000
SCR market risk	**2,726**	3,448
SCR counterparty default risk	**2,940**	3,057
SCR non-life underwriting risk	**14,221**	20,743
Aggregation (diversification effect)	**(3,049)**	(10,517)
Basic SCR	**16,838**	16,731
Operational risk SCR	**2,035**	2,162
Diversified SCR, excluding capital add-on	**18,873**	18,893
Capital add-on	**—**	—
SCR	**18,873**	18,893

Note that there has been a change in the presentation of the diversification figure in 2018, this is purely presentational and does not impact the final SCR figure. The figures above correspond to the sensitivities shown for each risk category in Section C, with additional allowance for diversification as per the Solvency II SF.

The SCR has remained relatively stable over the year, decreasing by €0.02m from €18.89m in 2017 to €18.87m in 2018.

The operational risk capital is calculated based on factors applied to the technical provisions and premiums for each line of business underwritten. This is subject to regulatory minimum capital holdings as shown in the QRT S.26.06 SCR - Operational Risk. The full details of this calculation are given in this QRT.

MCR

	31-Dec-18	31-Dec-17
	€'000	€'000
MCR	**4,718**	4,723

Similar to the SCR, the change in MCR has remained relatively stable over the year.

Capital Add-Ons

The Undertaking is not currently subject to any capital add-on based on instructions from the supervisor.

E.2.4 Treatment of participating business

This is not applicable to the Undertaking.

E.2.5 Risk mitigation techniques and future management actions

Treatment of risk mitigation techniques

Section D2 highlights the risk mitigation techniques in place for the Undertaking. In this section, we highlight the risk mitigation techniques for which the Undertaking takes credit while calculating its SCR.

The following are the risk mitigation techniques allowed for in the SCR calculation of the Undertaking:

- Reinsurance: The business written by the Undertaking is heavily reinsured and, in particular, the credit business (ILOE) sold in Italy, Spain and Romania is ceded to reinsurers on the basis of proportional reinsurance treaties, with cession up to 95%. Reinsurance treaties in place include both arrangements with external and internal reinsurers.

Treatment of future management actions

The Undertaking has not allowed for future management actions in the SCR calculation.

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

This is not applicable to the Undertaking.

E.4 Differences between the SF and any internal model used

This is not applicable to the Undertaking.

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

The Undertaking has had own funds in excess of both the SCR and MCR requirements over the reporting period.

E.6 Any other information

All information has been disclosed in the preceding sections.

Glossary of terms

Undertaking	MetLife Europe Insurance d.a.c.
Board	The Board of Directors of the Undertaking
Business Unit	The Undertaking's branches and any business conducted under Freedom to Provide Services
Solvency II Directive	European Commission Directive 2009/138/EC on the taking-up and pursuit of the business of Insurance and Reinsurance
A&H	Accident and Health
ALM	Asset Liability Management
BCP	Business Continuity Plan
BEC	Branch Executive Committee
BEL	Best Estimate Liability
BRC	Board Risk Committee
BSCR	Basic Solvency Capital Requirement
CBI	Central Bank of Ireland (the Irish Regulatory Authority)
CASSA	Cassa Integrazione Guadagni
CEO	Chief Executive Officer
CF	Controlled Function
CFO	Chief Finance Officer
CLAS	Credit Life Administration System
CRM	Compliance Risk Management
CRO	Chief Risk Officer
DAC	Deferred Acquisition Costs
d.a.c.	Designated Activity Company
DR	Disaster Recovery
DTC	Direct-to-Consumer
EEA	European Economic Area
EIOPA	European Insurance and Occupational Pensions Authority (the European Regulatory Authority)
EMC	Executive Management Committee
EPIFP	Expected Profit included in Future Premiums
ERC	Executive Risk Committee
ERSA	Enterprise Risk Self Assessment
EU	European Union
FOS	Freedom of Service
GAAP	Generally Accepted Accounting Principles
HO	Head Office
HR	Human Resources
HRG	Homogeneous Risk Group
IBNR	Incurred But Not Reported
IFRS	International Financial Reporting Standards
IIA	Institute of Internal Auditors
ILOE	Involuntary Loss of Employment
IT	Information Technology
MA	Modelled Adjustments
MAP	Matching Adjustment Portfolio
MCR	Minimum Capital Requirement

MPI	Mobile Phone Insurance
NAV	Net Asset Value
ORSA	Own Risk and Solvency Assessment
PAD	Provision for Adverse Deviations
PCF	Pre-Approval Controlled Function
PMC	Product Management Committee
QRT	Quantitative Reporting Template
RACC	Risk, Audit and Compliance Committee
RBNS	Reported But Not Settled
RFF	Ring Fenced Fund
RM	Risk Margin
RSR	Regular Supervisory Report
SCR	Solvency Capital Requirement
SF	Solvency II Standard Formula
SFCR	Solvency and Financial Condition Report
SLT	Similar to Life Techniques
SP	Single Premium
TCF	Treating Customers Fairly
UA	Un-modelled Adjustments
UCA	Unearned Commission Asset
UK	United Kingdom
ULR	Ultimate Loss Ratio
USA	United States of America
USPs	Undertaking Specific Parameters

Annex: Quantitative Reporting Templates

The following QRTs are reported in this annex:

- S.02.01.02 Balance sheet
- S.05.01.02 Premiums, claims and expenses by line of business
- S.05.02.01 Premiums, claims and expenses by country
- S.17.01.02 Non-Life Technical Provisions
- S.19.01.21 Non-Life Insurance Claims Information
- S.23.01.01 Own Funds
- S.25.01.21 Solvency Capital Requirement - for undertakings on Standard Formula
- S.28.01.01 Minimum Capital Requirement

S.02.01.02

Balance sheet

		Solvency II	Reclassification adjustment
		C0010	EC0021
Assets			
Goodwill	R0010		
Deferred acquisition costs	R0020		
Intangible assets	R0030	-	-
Deferred tax assets	R0040	41,561	-
Pension benefit surplus	R0050	-	-
Property, plant and equipment held for own use	R0060	-	-
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	42,447,335	-
Property (other than for own use)	R0080	-	-
Holdings in related undertakings, including participations	R0090	-	-
Equities	R0100	-	-
Equities - listed	R0110	-	-
Equities - unlisted	R0120	-	-
Bonds	R0130	33,940,834	-
Government Bonds	R0140	7,358,319	-
Corporate Bonds	R0150	26,582,515	-
Structured Notes	R0160	-	-
Collateralised Securities	R0170	-	-
Collective Investments Undertakings	R0180	43,199	-
Derivatives	R0190	-	-
Deposits other than cash equivalents	R0200	8,463,302	-
Other investments	R0210	-	-
Assets held for index-linked and unit-linked contracts	R0220	-	-
Loans and mortgages	R0230	-	-
Loans on policies	R0240	-	-
Loans and mortgages to individuals	R0250	-	-
Other loans and mortgages	R0260	-	-
Reinsurance recoverables	R0270	18,272,309	-
Non-life and health similar to non-life	R0280	18,272,309	
Non-Life excluding Health	R0290	18,272,309	
Health similar to Non-Life	R0300	-	
Life and health similar to life, excluding health, index-linked and unit-linked	R0310	-	
Health similar to Life	R0320	-	
Life excluding Health and index-linked and unit-linked	R0330	-	
Life index-linked and unit-linked	R0340	-	
Deposits to cedants	R0350	-	-
Insurance and intermediaries receivables	R0360	9,569,394	-
Reinsurance receivables	R0370	300	-
Receivables (trade, not insurance)	R0380	4,053,518	-
Own Shares	R0390	-	-
Amounts due in respect of own funds or initial fund called up but not paid in	R0400	-	-
Cash and cash equivalents	R0410	23,227,683	-
Any other assets, not elsewhere shown	R0420	-	-
Total Assets	R0500	97,612,101	-

S.02.01.02

Balance sheet

		Solvency II	Reclassification adjustment
		C0010	EC0021
Liabilities			
Technical Provisions - Non-life	R0510	27,125,461	-
Technical Provisions - Non-Life (excluding Health)	R0520	27,125,461	
TP calculated as a whole	R0530	-	
Best Estimate	R0540	23,364,367	
Risk Margin	R0550	3,761,094	
Technical Provisions - Health (similar to Non-Life)	R0560	-	
TP calculated as a whole	R0570	-	
Best Estimate	R0580	-	
Risk Margin	R0590	-	
Technical provisions - Life (excluding index-linked and unit-linked)	R0600	-	-
Technical Provisions - Health (similar to Life)	R0610	-	
TP calculated as a whole	R0620	-	
Best Estimate	R0630	-	
Risk Margin	R0640	-	
Technical Provisions - Life (excl Health, index linked and unit-linked)	R0650	-	
TP calculated as a whole	R0660	-	
Best Estimate	R0670	-	
Risk Margin	R0680	-	
Technical provisions - index-linked and unit-linked	R0690	-	-
TP calculated as a whole	R0700	-	
Best Estimate	R0710	-	
Risk Margin	R0720	-	
Other Technical Provisions	R0730		
Contingent liabilities	R0740	-	-
Provisions other than technical provisions	R0750	72,998	-
Pension benefit obligations	R0760	-	-
Deposits from reinsurers	R0770	-	-
Deferred tax liabilities	R0780	586,460	-
Derivatives	R0790	-	-
Debts owed to credit institutions	R0800	-	-
Debts owed to credit institutions resident domestically	ER0801	-	-
Debts owed to credit institutions resident in the euro area	ER0802	-	-
Debts owed to credit institutions resident in rest of world	ER0803	-	-
Financial liabilities other than debts owed to credit institutions	R0810	-	-
Debts owed to non-credit institutions	ER0811	-	-
Debts owed to non-credit institutions resident domestically	ER0812	-	-
Debts owed to non-credit institutions resident in the euro area	ER0813	-	-
Debts owed to non-credit institutions resident in rest of world	ER0814	-	-
Other financial liabilities (debt securities issued)	ER0815	-	-
Insurance and intermediaries payable	R0820	19,969,821	-
Reinsurance payables	R0830	2,991,745	-
Payables (trade, not insurance)	R0840	4,160,865	-
Subordinated liabilities	R0850	-	-
Subordinated liabilities not in BOF	R0860	-	-
Subordinated liabilities in BOF	R0870	-	-
Any other liabilities not elsewhere shown	R0880	-	-
Total Liabilities	R0900	54,907,350	-
Excess of assets over liabilities	R1000	42,704,751	

S.05.01.02

Premiums, claims and expenses by Line of Business

		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance
		Line of Business for Non-Life obligations										
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110
Premiums written	Gross											
Premiums, claims and expenses by Line of Business	Input											
Premiums written												
Gross - Direct business	R0110	0	0	0	0	0	0	0	0	0	0	1,880,578
Gross - Proportional reinsurance accepted	R0120	0	0	0	0	0	0	0	0	0	0	0
Gross - Non-proportional reinsurance accepted	R0130											
Reinsurer's share	R0140	0	0	0	0	0	0	0	0	0	0	0
Net	R0200	0	0	0	0	0	0	0	0	0	0	1,880,578
Premiums earned												
Gross - Direct business	R0210	0	0	0	0	0	0	0	0	0	0	1,880,578
Gross - Proportional reinsurance accepted	R0220	0	0	0	0	0	0	0	0	0	0	0
Gross - Non-proportional reinsurance accepted	R0230											
Reinsurer's share	R0240	0	0	0	0	0	0	0	0	0	0	0
Net	R0300	0	0	0	0	0	0	0	0	0	0	1,880,578
Claims incurred												
Gross - Direct business	R0310	0	0	0	0	0	0	0	0	0	0	218,517
Gross - Proportional reinsurance accepted	R0320	0	0	0	0	0	0	0	0	0	0	0
Gross - Non-proportional reinsurance accepted	R0330											
Reinsurer's share	R0340	0	0	0	0	0	0	0	0	0	0	0
Net	R0400	0	0	0	0	0	0	0	0	0	0	218,517
Changes in other technical provisions												
Gross - Direct business	R0410	0	0	0	0	0	0	0	0	0	0	29,719
Gross - Proportional reinsurance accepted	R0420	0	0	0	0	0	0	0	0	0	0	0
Gross - Non-proportional reinsurance accepted	R0430											
Reinsurer's share	R0440	0	0	0	0	0	0	0	0	0	0	0
Net	R0500	0	0	0	0	0	0	0	0	0	0	29,719

S.05.01.02

Premiums, claims and expenses by Line of Business

		Line of Business for Non-Life obligations	Line of Business for accepted non-proportional reinsurance				Non-Life insurance
		Miscellaneous financial loss	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance	Non-Life insurance
		C0120	C0130	C0140	C0150	C0160	C0200
Premiums written	Gross						
Premiums, claims and expenses by Line of Business	Input						
Premiums written							
Gross - Direct business	R0110	60,604,119					62,484,696
Gross - Proportional reinsurance accepted	R0120	459,570					459,570
Gross - Non-proportional reinsurance accepted	R0130		0	0	0	0	0
Reinsurer's share	R0140	45,712,072	0	0	0	0	45,712,072
Net	R0200	15,351,617	0	0	0	0	17,232,195
Premiums earned							
Gross - Direct business	R0210	64,976,361					66,856,939
Gross - Proportional reinsurance accepted	R0220	459,570					459,570
Gross - Non-proportional reinsurance accepted	R0230		0	0	0	0	0
Reinsurer's share	R0240	49,933,029	0	0	0	0	49,933,029
Net	R0300	15,502,902	0	0	0	0	17,383,480
Claims incurred							
Gross - Direct business	R0310	4,820,378					5,038,894
Gross - Proportional reinsurance accepted	R0320	128,927					128,927
Gross - Non-proportional reinsurance accepted	R0330		0	0	0	0	0
Reinsurer's share	R0340	4,111,620	0	0	0	0	4,111,620
Net	R0400	837,685	0	0	0	0	1,056,202
Changes in other technical provisions							
Gross - Direct business	R0410	-4,207					25,513
Gross - Proportional reinsurance accepted	R0420	0					0
Gross - Non-proportional reinsurance accepted	R0430		0	0	0	0	0
Reinsurer's share	R0440	-452,200	0	0	0	0	-452,200
Net	R0500	447,994	0	0	0	0	477,713

S.05.01.02

Premiums, claims and expenses by Line of Business

		Line of Business for Non-Life obligations										
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110
Expenses incurred	R0550	0	0	0	0	0	0	0	0	0	0	1,358,773
Other expenses	R1200											
Total expenses	R1300											

S.05.01.02

Premiums, claims and expenses by Line of Business

		Line of Business for Non-Life obligations	Line of Business for accepted non-proportional reinsurance				Non-Life insurance
		Miscellaneous financial loss	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance	Non-Life insurance
		C0120	C0130	C0140	C0150	C0160	C0200
Expenses incurred	R0550	18,066,411	0	0	0	0	19,425,184
Other expenses	R1200						0
Total expenses	R1300						19,425,184

S.05.01.02

Premiums, claims and expenses by Line of Business

		Line of Business for Life obligations						Line of Business for Life reinsurance obligations		
		Health insurance	Insurance with profit participation	Index-linked and unit-linked insurance	Other life insurance	Annuities stemming from non-Life insurance contracts related to health	Annuities stemming from non-life insurance contracts other than health	Health reinsurance	Accepted reinsurance	Life insurance
		C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0300
Premiums written										
Gross	R1410	0	0	0	0	0	0	0	0	0
Reinsurer's share	R1420	0	0	0	0	0	0	0	0	0
Net	R1500	0	0	0	0	0	0	0	0	0
Premiums earned										
Gross	R1510	0	0	0	0	0	0	0	0	0
Reinsurer's share	R1520	0	0	0	0	0	0	0	0	0
Net	R1600	0	0	0	0	0	0	0	0	0
Claims incurred										
Gross	R1610	0	0	0	0	0	0	0	0	0
Reinsurer's share	R1620	0	0	0	0	0	0	0	0	0
Net	R1700	0	0	0	0	0	0	0	0	0
Changes in other technical provisions										
Gross	R1710	0	0	0	0	0	0	0	0	0
Reinsurer's share	R1720	0	0	0	0	0	0	0	0	0
Net	R1800	0	0	0	0	0	0	0	0	0

S.05.01.02

Premiums, claims and expenses by Line of Business

		Line of Business for Life obligations						Line of Business for Life reinsurance obligations		
		Health insurance	Insurance with profit participation	Index-linked and unit-linked insurance	Other life insurance	Annuities stemming from non-Life insurance contracts related to health	Annuities stemming from non-life insurance contracts other than health	Health reinsurance	Accepted reinsurance	Life insurance
		C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0300
Expenses incurred	R1900	0	0	0	0	0	0	0	0	0
Other expenses	R2500									0
Total expenses	R2600									0

S.05.02.01

Premiums, claims and expenses by country

		Home country	Top 5 countries (by amount of gross premiums written) - non-life obligations				Total Top 5 and home country
		C0010	C0020	C0030	C0040	C0050	C0070
	R0010	IE	ES	IT	RO	PT	
		C0080	C0090	C0100	C0110	C0120	C0140
Premiums written							
Gross - Direct business	R0110	4,222,850.44	24,460,137.90	16,581,771.12	6,328,742.73	5,955,057.80	57,548,559.99
Gross - Proportional reinsurance accepted	R0120	180,597.43	278,972.66	0.00	0.00	0.00	459,570.09
Gross - Non-proportional reinsurance accepted	R0130	0.00	0.00	0.00	0.00	0.00	0.00
Reinsurer's share	R0140	984,931.86	23,516,446.30	14,792,359.78	5,777,400.39	0.00	45,071,138.33
Net	R0200	3,418,516.01	1,222,664.26	1,789,411.34	551,342.34	5,955,057.80	12,936,991.75
Premiums earned							
Gross - Direct business	R0210	4,371,268.90	24,444,620.53	23,709,186.92	3,301,545.95	5,953,005.87	61,779,628.17
Gross - Proportional reinsurance accepted	R0220	180,597.43	278,972.66	0.00	0.00	0.00	459,570.09
Gross - Non-proportional reinsurance accepted	R0230	0.00	0.00	0.00	0.00	0.00	0.00
Reinsurer's share	R0240	984,931.86	23,501,704.80	22,157,609.08	2,647,849.75	0.00	49,292,095.49
Net	R0300	3,566,934.47	1,221,888.39	1,551,577.84	653,696.20	5,953,005.87	12,947,102.77
Claims incurred							
Gross - Direct business	R0310	827,731.05	1,648,040.14	1,614,527.28	327,858.59	316,680.16	4,734,837.22
Gross - Proportional reinsurance accepted	R0320	121,542.83	7,384.36	0.00	0.00	0.00	128,927.19
Gross - Non-proportional reinsurance accepted	R0330	0.00	0.00	0.00	0.00	0.00	0.00
Reinsurer's share	R0340	650,969.58	1,812,638.79	1,424,131.62	54,752.47	-124.29	3,942,368.17
Net	R0400	298,304.30	-157,214.29	190,395.66	273,106.12	316,804.45	921,396.24
Changes in other technical provisions							
Gross - Direct business	R0410	0.00	0.00	0.00	0.00	0.00	0.00
Gross - Proportional reinsurance accepted	R0420	0.00	0.00	0.00	0.00	0.00	0.00
Gross - Non-proportional reinsurance accepted	R0430	0.00	0.00	0.00	0.00	0.00	0.00
Reinsurer's share	R0440	0.00	-30,638.56	-374,016.90	-47,544.99	0.00	-452,200.45
Net	R0500	0.00	30,638.56	374,016.90	47,544.99	0.00	452,200.45
Expenses incurred	R0550	3,107,286.64	3,011,376.60	4,274,561.57	471,061.59	5,152,487.66	16,016,774.06
Other expenses	R1200						0.00
Total expenses	R1300	3,107,286.64	3,011,376.60	4,274,561.57	471,061.59	5,152,487.66	16,016,774.06

S.05.02.01

Premiums, claims and expenses by country

		Home country-life	Total Top 5 and home country-life
		C0150	C0210
	R1400	IE	
		C0220	C0280
Premiums written			
Gross	R1410	0.00	0.00
Reinsurer's share	R1420	0.00	0.00
Net	R1500	0.00	0.00
Premiums earned			
Gross	R1510	0.00	0.00
Reinsurer's share	R1520	0.00	0.00
Net	R1600	0.00	0.00
Claims incurred			
Gross	R1610	0.00	0.00
Reinsurer's share	R1620	0.00	0.00
Net	R1700	0.00	0.00
Changes in other technical provisions			
Gross	R1710	0.00	0.00
Reinsurer's share	R1720	0.00	0.00
Net	R1800	0.00	0.00
Expenses incurred	R1900	0.00	0.00
Other expenses	R2500		0.00
Total expenses	R2600		0.00

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Non-Life Technical Provisions

		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
		C0020	C0030	C0040	C0050	C0060	C0070
Total recoverables from reinsurance/SPV and Finite Re after adjustment	R0050	0	0	0	0	0	0
Technical Provisions calculated as a sum of BE and RM							
Best Estimate							
Premium Provisions							
Gross - Total	R0060	0	0	0	0	0	0
Total recoverables from reinsurance/SPV and Finite Re after adjustment	R0140	0	0	0	0	0	0
Net best estimate of premium provisions	R0150	0	0	0	0	0	0
Claims Provisions							
Gross - Total	R0160	0	0	0	0	0	0
Total recoverables from reinsurance/SPV and Finite Re after adjustment	R0240	0	0	0	0	0	0
Net best estimate of claim provisions	R0250	0	0	0	0	0	0
Total Best Estimate - Gross	R0260	0	0	0	0	0	0
Total Best Estimate - Net	R0270	0	0	0	0	0	0
Risk Margin	R0280	0	0	0	0	0	0

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Non-Life Technical Provisions

		Direct business and accepted proportional reinsurance					
		Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss
		C0080	C0090	C0100	C0110	C0120	C0130
Total recoverables from reinsurance/SPV and Finite Re after adjustment	R0050	0	0	0	0	0	0
Technical Provisions calculated as a sum of BE and RM							
Best Estimate							
Premium Provisions							
Gross - Total	R0060	0	0	0	0	-77,740	16,603,553
Total recoverables from reinsurance/SPV and Finite Re after adjustment	R0140	0	0	0	0	25,529	14,048,679
Net best estimate of premium provisions	R0150	0	0	0	0	-103,269	2,554,874
Claims Provisions							
Gross - Total	R0160	0	0	0	0	49,441	6,789,113
Total recoverables from reinsurance/SPV and Finite Re after adjustment	R0240	0	0	0	0	38,460	4,159,641
Net best estimate of claim provisions	R0250	0	0	0	0	10,981	2,629,472
Total Best Estimate - Gross	R0260	0	0	0	0	-28,299	23,392,666
Total Best Estimate - Net	R0270	0	0	0	0	-92,288	5,184,346
Risk Margin	R0280	0	0	0	0	129,531	3,631,563

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Non-Life Technical Provisions

		Accepted non-proportional reinsurance				
		Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance	Non-Life insurance
		C0140	C0150	C0160	C0170	C0180
Total recoverables from reinsurance/SPV and Finite Re after adjustment	R0050	0	0	0	0	0
Technical Provisions calculated as a sum of BE and RM						
Best Estimate						
Premium Provisions						
Gross - Total	R0060	0	0	0	0	16,525,813
Total recoverables from reinsurance/SPV and Finite Re after adjustment	R0140	0	0	0	0	14,074,208
Net best estimate of premium provisions	R0150	0	0	0	0	2,451,605
Claims Provisions						
Gross - Total	R0160	0	0	0	0	6,838,554
Total recoverables from reinsurance/SPV and Finite Re after adjustment	R0240	0	0	0	0	4,198,101
Net best estimate of claim provisions	R0250	0	0	0	0	2,640,453
Total Best Estimate - Gross	R0260	0	0	0	0	23,364,367
Total Best Estimate - Net	R0270	0	0	0	0	5,092,058
Risk Margin	R0280	0	0	0	0	3,761,094

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Non-Life Technical Provisions

		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
		C0020	C0030	C0040	C0050	C0060	C0070
Amount of the transitional on Technical Provisions							
Technical Provisions calculated as a whole	R0290	0	0	0	0	0	0
Best Estimate	R0300	0	0	0	0	0	0
Risk Margin	R0310	0	0	0	0	0	0
Technical Provisions - total							
Technical Provisions - total	R0320	0	0	0	0	0	0
Total recoverables from reinsurance/SPV and Finite Re after adjustment	R0330	0	0	0	0	0	0
Technical provisions minus recoverables from reinsurance/SPV and Finite Re	R0340	0	0	0	0	0	0

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Non-Life Technical Provisions

		Direct business and accepted proportional reinsurance					
		Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss
		C0080	C0090	C0100	C0110	C0120	C0130
Amount of the transitional on Technical Provisions							
Technical Provisions calculated as a whole	R0290	0	0	0	0	0	0
Best Estimate	R0300	0	0	0	0	0	0
Risk Margin	R0310	0	0	0	0	0	0
Technical Provisions - total							
Technical Provisions - total	R0320	0	0	0	0	101,232	27,024,229
Total recoverables from reinsurance/SPV and Finite Re after adjustment	R0330	0	0	0	0	63,989	18,208,320
Technical provisions minus recoverables from reinsurance/SPV and Finite Re	R0340	0	0	0	0	37,243	8,815,909

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Non-Life Technical Provisions

		Accepted non-proportional reinsurance				
		Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance	Non-Life insurance
		C0140	C0150	C0160	C0170	C0180
Amount of the transitional on Technical Provisions						
Technical Provisions calculated as a whole	R0290	0	0	0	0	0
Best Estimate	R0300	0	0	0	0	0
Risk Margin	R0310	0	0	0	0	0
Technical Provisions - total						
Technical Provisions - total	R0320	0	0	0	0	27,125,461
Total recoverables from reinsurance/SPV and Finite Re after adjustment	R0330	0	0	0	0	18,272,309
Technical provisions minus recoverables from reinsurance/SPV and Finite Re	R0340	0	0	0	0	8,853,152

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Non-life Insurance Claims Information

Accident year / Underwriting year	Z0010	Accident year

Gross Claims Paid (non-cumulative)

Development year

		0	1	2	3	4	5	6	7	8	9	10 & +	In Current Year	Sum of years
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0170	C0180
Prior	R0100											1,181	1,181	1,181
N - 9	R0160	943,807	6,932,143	1,319,895	123,049	18,441	15,759	4,129	4,103	-	2,976		2,976	9,364,304
N - 8	R0170	2,217,953	6,044,478	864,166	55,367	8,092	5,325	789	-	42			42	9,196,212
N - 7	R0180	1,744,300	4,632,151	712,056	35,718	3,940	4,823	-	2,149				2,149	7,135,138
N - 6	R0190	1,399,397	4,101,513	1,537,600	88,098	35,001	19,346	2,278					2,278	7,183,234
N - 5	R0200	1,911,649	7,199,346	1,230,567	116,182	22,978	11,850						11,850	10,492,573
N - 4	R0210	4,286,898	6,044,094	943,106	78,849	50,846							50,846	11,403,794
N - 3	R0220	3,466,709	4,621,245	704,463	69,638								69,638	8,862,055
N - 2	R0230	2,678,392	3,517,010	576,416									576,416	6,771,818
N - 1	R0240	2,189,083	3,102,066										3,102,066	5,291,150
N	R0250	2,437,894											2,437,894	2,437,894
Total	R0260												6,257,336	78,139,351

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Non-life Insurance Claims Information

Accident year / Underwriting year	Z0010	Accident year

Gross Undiscounted Best Estimate Claims Provisions

Development 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											120,348	120,348
N - 9	R0160	-	-	-	-	-	-	-	333,477	317,375	317,375		317,375
N - 8	R0170	-	-	-	-	-	-	265,313	254,569	242,970			242,970
N - 7	R0180	-	-	-	-	-	274,993	272,482	275,140				275,140
N - 6	R0190	-	-	-	-	312,680	298,209	292,567					292,567
N - 5	R0200	-	-	-	175,775	225,017	225,964						225,964
N - 4	R0210	-	-	198,862	211,254	159,892							159,892
N - 3	R0220	-	910,260	205,725	77,451								77,451
N - 2	R0230	5,356,882	997,133	202,182									202,182
N - 1	R0240	4,535,643	815,218										815,218
N	R0250	4,109,453											4,109,453
Total	R0260												6,838,561

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Own Funds

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic Own Funds						
Ordinary share capital (gross of own shares)	R0010	2,048,387	2,048,387		-	
Share premium related to ordinary share capital	R0030	11,586,613	11,586,613		-	
Initial funds, members' contributions	R0040	-	-		-	
Subordinated mutual member accounts	R0050	-		-	-	-
Surplus funds	R0070	-	-			
Preference shares	R0090	-		-	-	-
Share premium related to preference shares	R0110	-		-	-	-
Reconciliation reserve before deduction for participations	R0130	29,028,189	29,028,189			
Subordinated liabilities	R0140	-		-	-	-
An amount equal to the value of net deferred tax assets	R0160	41,561				41,561
Other items approved by supervisory authority as basic own funds - Group	R0180	-	-	-	-	-
Own funds not represented by the reconciliation reserve	R0220	-				
Deductions not included in the reconciliation reserve						
Deductions for participations in financial and credit institutions	R0230	-	-	-	-	
Total basic own funds after adjustments	R0290	42,704,751	42,663,189	-	-	41,561
Ancillary Own Funds						
Unpaid and uncalled ordinary share capital	R0300	-			-	
Unpaid and uncalled initial funds	R0310	-			-	
Unpaid and uncalled preference share capital	R0320	-			-	-
Commitment to subscribe and pay for subordinated liabilities	R0330	-			-	-
Letters of credit and guarantees under Article 96(2)	R0340	-			-	
Letters of credit and guarantees other than under Article 96(2)	R0350	-			-	-
Supplementary members calls under Article 96(3)	R0360	-			-	
Supplementary members calls other than under Article 96(3)	R0370	-			-	-
Other ancillary own funds	R0390	-			-	-
Total ancillary own funds	R0400	-			-	-

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Own Funds

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	42,704,751	42,663,189	-	-	41,561
Total available own funds to meet the MCR	R0510	42,663,189	42,663,189	-	-	
Total eligible own funds to meet the SCR	R0540	42,704,751	42,663,189	-	-	41,561
Total eligible own funds to meet the MCR	R0550	42,663,189	42,663,189	-	-	
Solvency Capital Requirement	R0580	18,872,871				
Minimum Capital Requirement	R0600	4,718,218				
Ratio of Eligible own funds to SCR	R0620	226.28%				
Ratio of Eligible own funds to MCR	R0640	904.22%				

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Own Funds

		Total
		C0060
Reconciliation reserve		
Excess of assets over liabilities	R0700	42,704,751
Own shares (held directly and indirectly)	R0710	-
Forseeable dividends, distributions and charges	R0720	-
Other basic own funds items	R0730	13,676,561
Adjustment for restricted own fund items of MAPs and RFFs	R0740	-
Reconciliation reserve before deduction for participations	R0760	29,028,189
Expected profits		
Expected profits included in future premiums (EPIFP) - Life business	R0770	-
Expected profits included in future premiums (EPIFP) - Non-Life business	R0780	1,482,143
Total Expected profits included in future premiums (EPIFP)	R0790	1,482,143

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Solvency Capital Requirement - for undertakings on Standard Formula

		Gross solvency capital requirement	Simplifications
		C0110	C0120
Market risk	R0010	2,726,214	NONE
Counterparty default risk	R0020	2,939,705	
Life underwriting risk	R0030	-	NONE
Health underwriting risk	R0040	-	NONE
Non-life underwriting risk	R0050	14,221,083	NONE
Diversification	R0060	-3,049,214	
Intangible asset risk	R0070	-	
Basic Solvency Capital Requirement	R0100	16,837,788	

		USP
		C0090
Life underwriting risk	R0030	NONE
Health underwriting risk	R0040	NONE
Non-life underwriting risk	R0050	NONE

		Value
Calculation of Solvency Capital Requirement		C0100
Operational risk	R0130	2,035,084
Loss-absorbing capacity of technical provisions	R0140	-
Loss absorbing capacity of deferred taxes	R0150	-
Capital requirement in accordance with Art 4 of Directive 2003/41/EC	R0160	-
Solvency capital requirement excluding capital add-on	R0200	18,872,871
Capital add-ons already set	R0210	-
Solvency capital requirement	R0220	18,872,871
Other information on SCR		
Capital requirement for duration-based equity risk sub-module	R0400	-
Notional Solvency Capital Requirements for remaining part	R0410	-
Notional Solvency Capital Requirement for ring fenced funds	R0420	-
Notional Solvency Capital Requirements for matching adjustment portfolios	R0430	-
Diversification effects due to RFF nSCR aggregation for article 304	R0440	-

S.28.01.01

Minimum Capital Requirement

		MCR Components
		Non-Life activities
		MCR (NL, NL) Result
		C0010
Linear formula component for non-life insurance and reinsurance obligations	R0010	3,044,057

		Background Information	
		Non-Life activities	
		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	-	-
Workers' compensation insurance and proportional reinsurance	R0040	-	-
Motor vehicle liability insurance and proportional reinsurance	R0050	-	-
Other motor insurance and proportional reinsurance	R0060	-	-
Marine, aviation and transport insurance and proportional reinsurance	R0070	-	-
Fire and other damage to property insurance and proportional reinsurance	R0080	-	-
General liability insurance and proportional reinsurance	R0090	-	-
Credit and Suretyship insurance and proportional reinsurance	R0100	-	-
Legal expenses insurance and proportional reinsurance	R0110	-	-
Assistance and proportional reinsurance	R0120	-	1,956,407
Miscellaneous financial loss insurance and proportional reinsurance	R0130	5,184,346	15,684,216
Non-proportional Health reinsurance	R0140	-	-
Non-proportional casualty reinsurance	R0150	-	-
Non-proportional marine, aviation and transport reinsurance	R0160	-	-
Non-proportional property reinsurance	R0170	-	-

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Minimum Capital Requirement

		Non-Life activities
		C0040
Linear formula component for life insurance and reinsurance obligations	R0200	-

		Non-Life activities	
		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	3,044,057
SCR	R0310	18,872,871
MCR cap	R0320	8,492,792
MCR floor	R0330	4,718,218
Combined MCR	R0340	4,718,218
Absolute floor of the MCR	R0350	2,500,000
Minimum Capital Requirement	R0400	4,718,218