

MetLife Europe d.a.c.

**Solvency II Solvency and Financial Condition
Report**

For the year ended 31 December 2025

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Executive summary

Background

MetLife Europe 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 life assurance business in Life Classes I, III, IV and VI and Non-Life Classes 1 and 2 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 the United Kingdom (UK), Italy, Spain, Portugal, France, Czech Republic, Bulgaria, Slovakia, Hungary, Romania and Cyprus. The Undertaking also operates via Freedom of Services (FOS) in Germany and Austria.

The Undertaking is required to submit the 2025 Solvency and Financial Condition Report (SFCR) to the CBI as part of the 2025 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 provides a summary of the SFCR by section and notes any material changes during the year.

A - Business and Performance

Significant business events

The macroeconomic environment remains uncertain in 2026 due to a number of different factors. These include heightened geopolitical uncertainty as a result of the ongoing war in Ukraine, the conflict in the Middle East, and the impact of an evolving US tariff policy on Europe. Higher energy prices as a result of the Iran conflict in particular could raise inflationary pressure and interest rates, while at the same time lowering economic growth. The scale of the impact on growth, inflation rates, and the policy responses from central banks and governments, depends on how long the conflict lasts and extent of any lasting damage to energy supplies. Volatile US tariff policy presents an ongoing headwind to trade growth for many European countries. The directors will continue to monitor this ongoing situation for further developments which may impact the Undertaking.

The Undertaking paid a dividend of €211m to MetLife EU during the financial year. There were sufficient Financial Reporting Standards ("FRS") distributable reserves in accordance with the Companies Act 2014 requirements to support the payment of the dividend. In addition, the directors were satisfied that there was sufficient solvency cover, based on the Own Risk and Solvency Assessment (ORSA), to also support the payment of the dividend.

Overall, the Undertaking's solvency coverage decreased to 151% in 2025 (2024: 161%).

The board of directors of MetLife, Inc. oversees the development and execution of appropriate business strategies to ensure they generate long-term value for the enterprise and its shareholders and that such strategies do not involve excessive risks. MetLife's Enterprise Strategy and Purpose sets the framework within which the Undertaking undertakes the strategy setting process.

In January 2025, the Undertaking launched its refreshed Enterprise Strategy, referred to as the 'New Frontier Strategy'. The New Frontier Strategy builds on the Undertaking's previous Enterprise Strategy, the 'Next Horizon Strategy,' which was launched in 2020. The Undertaking's stated Purpose is to be 'Always with you, building a more confident future,' The Purpose sets the Undertaking's aspirations for its' key stakeholders; Customers, Employees and Shareholders.

The New Frontier Strategy enables the Undertaking to live its Purpose, and supports the delivery of its aspirations for Growth, Returns, and All-Weather Performance, through a Commercial Mindset, Prioritising for Impact, and Moving with Speed and Discipline.

Business performance

The financial statements are prepared under Irish GAAP. Profit has increased from €137m in 2024 to €158m in 2025. This is mainly due to business growth in UK and Romania, partially offset by higher Undertaking operating expenses.

There were no new lines of business or geographical segments entered into 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 (the Board), 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;
- 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; and
- The Undertaking's business resilience framework which ensures the ability to maintain operational during a period of unexpected disruption.

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;
- Investment Committee; and
- Nomination 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 Risk Framework) sets out the approaches to risk management and the structure to be followed by all associates in their capacity as executives, management and staff. The key objectives of the Risk 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 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 mitigating 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.

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 and oversight of the system of Internal Control. It aims to define how effective internal control is achieved and consequently how risks are managed and provide the Board with a sufficient level of assurance that the internal control system is operating effectively.

C - Risk Profile

The Undertaking is exposed to underwriting, market, credit, liquidity and non-financial risk with the overall risk profile remaining broadly stable over the year.

Underwriting risk includes mortality risk, longevity risk, morbidity risk, policyholder behaviour risk, and expense risk. Underwriting risks are primarily mitigated through diversification and single-exposure limits for different components such as mortality and morbidity. Risks in excess of such limits can be accepted but must be reinsured. Catastrophe reinsurance is used to limit the total loss that can be incurred as the result of single events and to manage risk concentrations.

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 equity markets, either indirectly through revenues that depend on the value of investments covering unit-linked policies or directly through positions held to facilitate policyholder transactions or guarantees provided to policyholders. Market risks are primarily mitigated through aligning assets and liabilities, in particular in terms of currencies and timing of cash flows. Equity exposures from the book of unit-linked policies are managed through product design and selection of suitable investment funds.

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. Given the long-term nature of its business, there are only very few areas in which liquidity risk can arise. 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, independently validated by Risk, Compliance using a risk-based approach and by both Internal and External Audit functions.

The Undertaking is also exposed to emerging and evolving risks. Key emerging risks include political risks from rising global protectionism and US tariff policies causing market volatility and economic uncertainty, especially in trade relations and geopolitical tensions. Technology risks involve rapid technology changes and cybersecurity threats, with concerns over cyber resilience and talent shortages. AI offers operational benefits but also heightens risks of sophisticated cyber-attacks linked to geopolitical conflicts.

In addition to the risks outlined above, sustainability remains a consideration for the Undertaking with Environmental, Social and Governance (ESG) factors playing a role in shaping our decisions. With regard to climate risk specifically, the Undertaking has continued to strengthen its efforts to understand the impact that climate risk, both physical and transition, may have on its business. The Undertaking continues to make progress on building its scenario analysis capabilities and understanding the potential impact of climate risk on our assets through a combination of qualitative and quantitative analysis.

The Undertaking reviews its risk exposures regularly and considers potential actions to align exposure to risk appetite. Sensitivities on these exposures are included in section C.

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 Irish GAAP relate to deferred acquisition costs and intangible assets, which are not recognised under Solvency II. In addition property, plant and equipment is measured at cost less accumulated depreciation for Irish GAAP as against fair value for Solvency II. Commercial mortgage loans are stated at unpaid principal balance, adjusted for any deferred fees for Irish GAAP compared to fair value for 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 Irish GAAP 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 Irish GAAP generally does not. Solvency II determines a risk margin, whereas this concept does not generally apply to Irish GAAP.

Solvency II requires assumptions to be based on best estimate whereas Irish GAAP 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 lapses, expenses, mortality and morbidity.

Net technical provisions increased by €41m from €2,280m in 2024 to €2,321m in 2025. This increase in net technical provisions was primarily due to a decrease in reinsurance relief of €29m driven by new business sales of products with negative reserves. Also contributing to the overall movement was an increase in gross technical provisions of €12m mainly driven by an increase in unit linked liabilities owing to new business sales and positive equity market performance, partially offset by new business sales of regular premium products with negative reserves across the Undertaking and annual assumption updates.

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.

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-25	31-Dec-24	Movement
	€'m	€'m	€'m
Own Funds			
Tier One	1,090	1,064	26
Tier Two	—	—	—
Tier Three	16	21	(5)
Eligible own funds for SCR	1,106	1,085	21
SCR	731	673	58
Solvency Ratio	151%	161%	(10)%
Eligible own funds for MCR	1,090	1,064	26
MCR	329	303	26

Own funds increased by €21m from €1,085m in 2024 to €1,106m in 2025. The increase in own funds is primarily driven by the positive impact of contract boundary renewals in UK A&H business; new business and renewals in Slovakia, France and Czech Republic; positive claims experience in UK and Italy; and the impact of actuarial assumptions updates. The largest offsetting movement was the payment of a dividend of €211m to MetLife EU in December 2025.

The SCR increased by €58m from €673m in 2024 to €731m in 2025. Primary drivers included increases in Life Underwriting risk mainly due to renewals in the UK Group Life business and new business sales across branches, and increases in Health Underwriting Risk mainly due to renewals and new business in the UK A&H business.

As a result of the above movements in own funds and SCR, the solvency ratio decreased by 10% from 161% in 2024 to 151% in 2025.

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.

Approval

The SFCR was approved by the Board on 25 March 2026.

A Business and performance

A.1 Business

A.1.1 Overview

The Undertaking is an Irish incorporated entity domiciled in Ireland and is authorised by the CBI to transact life assurance business in Life Classes I, III, IV and VI and Non Life Classes 1 and 2 under the EU (Insurance and Reinsurance) Regulations 2015 (S.I. No. 485 of 2015).

The Undertaking's immediate parent company is MetLife EU and its ultimate parent company is MetLife, Inc., a company domiciled in the USA. See section 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 the UK, Italy, Spain, Portugal, France, Czech Republic, Bulgaria, Slovakia, Hungary, Romania and Cyprus. The Undertaking also operates via FOS in Germany and Austria.

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, whose address is:

Deloitte Ireland LLP
Chartered Accountants and Statutory Audit Firm
Deloitte and 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 other events

The macroeconomic environment remains uncertain in 2026 due to a number of different factors. These include heightened geopolitical uncertainty as a result of the ongoing war in Ukraine, the conflict in the Middle East, and the impact of an evolving US tariff policy on Europe. Higher energy prices as a result of the Iran conflict in particular could raise inflationary pressure and interest rates, while at the same time lowering economic growth. The scale of the impact on growth, inflation rates, and the policy responses from central banks and governments, depends on how long the conflict lasts and extent of any lasting damage to energy supplies. Volatile US tariff policy presents an ongoing headwind to trade growth for many European countries. The directors will continue to monitor this ongoing situation for further developments which may impact the Undertaking.

The Undertaking paid a dividend of €211m to MetLife EU during the financial year. There were sufficient FRS distributable reserves in accordance with the Companies Act 2014 requirements to support the payment of the dividend. In addition, the directors were satisfied that there was sufficient solvency cover, based on the ORSA, to also support the payment of the dividend.

Overall, the Undertaking's solvency coverage decreased to 151% in 2025 (2024: 161%). Additional details are provided in section E.2.3.

The board of directors of MetLife, Inc. oversees the development and execution of appropriate business strategies to ensure they generate long-term value for the enterprise and its shareholders and that such strategies do not involve excessive risks. MetLife’s Enterprise Strategy and Purpose sets the framework within which the Undertaking undertakes the strategy setting process.

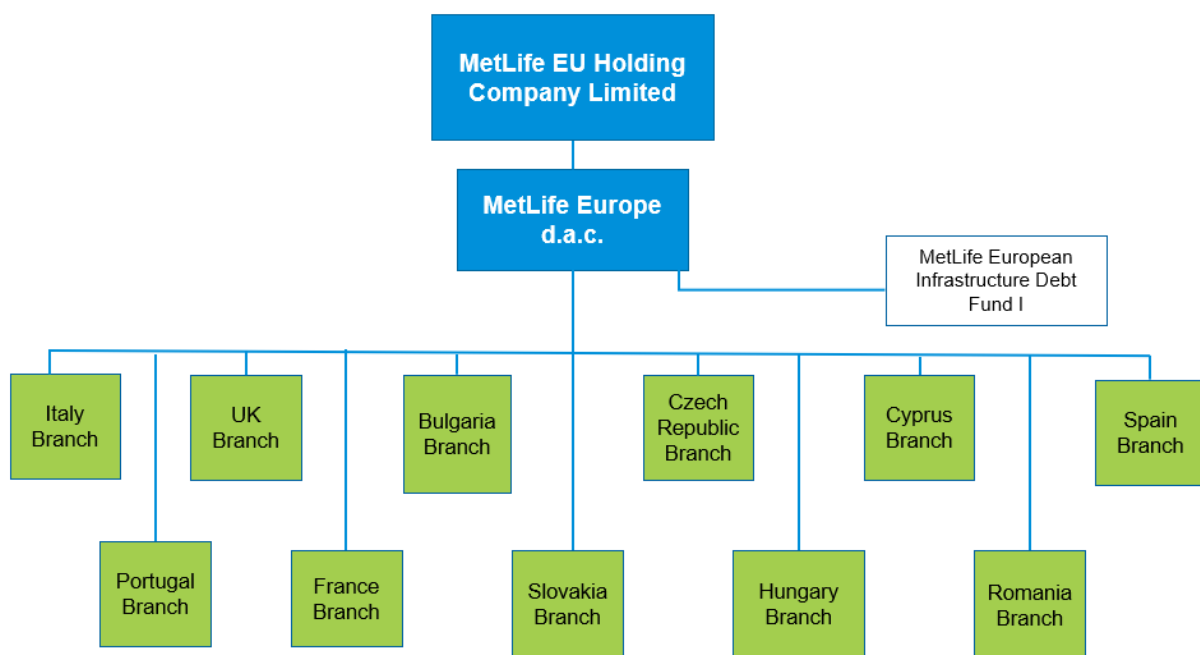
In January 2025, the Undertaking launched its refreshed Enterprise Strategy, referred to as the ‘New Frontier Strategy’. The New Frontier Strategy builds on the Undertaking’s previous Enterprise Strategy, the ‘Next Horizon Strategy,’ which was launched in 2020. The Undertaking’s stated Purpose is to be ‘Always with you, building a more confident future.’ The Purpose sets the Undertaking’s aspirations for its’ key stakeholders; Customers, Employees and Shareholders.

The New Frontier Strategy enables the Undertaking to live its Purpose, and supports the delivery of its aspirations for Growth, Returns, and All-Weather Performance, through a Commercial Mindset, Prioritising for Impact, and Moving with Speed and Discipline.

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’s structure is depicted in the simplified chart below.



The Undertaking has authorised share capital of 100,000,000 shares of €1 each. At 31 December 2025, the Undertaking had issued €4,379,124 (2024: €4,379,124) in share capital. The qualifying holdings, number of shares and voting rights of the issued shares as at 31 December 2025 and 2024 are:

	Holdings	Shares
MetLife EU Holding Company Limited	100.00%	4,379,124

The Undertaking has a 100% holding in MetLife European Infrastructure Debt Fund I. The Undertaking approved a €50million investment in this fund in September 2024 and made its first investment in February 2025.

The Undertaking also had a 100% owned subsidiary in the UK, MetLife Pensions Trustees Limited (MPTL), a trustee and administrator of personal pension schemes, which was fully wound up during 2025.

A.1.4 Total performance

Total performance	Section reference	2025 €'m	2024 €'m
Operating			
Underwriting result	A2.1	341	316
Investment income	A3.1	66	74
Other income	A4.1	17	16
Expenses	A4.1	(214)	(205)
Tax	A4.1	(53)	(30)
Total operating		157	171
Non-operating			
Investment income	A3.1	110	268
Net fees	A4.1	(1)	(7)
Net Investment gains	A4.1	—	3
Foreign exchange gains/(losses)	A4.1	27	(18)
Direct interest credited to policyholder account balances	A4.1	(136)	(267)
Reinsured interest credited to policyholder account balances	A4.1	11	58
Expenses	A4.1	(2)	(14)
Interest on funds withheld	A4.1	(11)	(58)
Tax	A4.1	3	1
Total non-operating		1	(34)
Profit for the financial year		158	137

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

Analysis is provided in the sections referenced above.

A.2 Underwriting performance

A.2.1 Underwriting performance by line of business

The tables below set out the analysis of 2025 underwriting performance against the prior year.

	Health Insurance €'m 2025	Insurance with profit participation €'m 2025	Index linked and unit linked €'m 2025	Other life insurance €'m 2025	Non-life insurance €'m 2025	Total €'m 2025
Net earned premium	385	37	—	778	81	1,281
Fee income	1	6	104	5	—	116
Total premium and fee income	386	43	104	783	81	1,397
Claims incurred	(108)	(94)	(5)	(372)	(42)	(621)
Change in technical provisions	(6)	7	(7)	(21)	1	(26)
Total policyholder benefits	(114)	(87)	(12)	(393)	(41)	(647)
Commission	(136)	(1)	(49)	(199)	(23)	(408)
Other variable expenses	(32)	(10)	—	(85)	—	(127)
Total variable expenses	(168)	(11)	(49)	(284)	(23)	(535)
Deferred acquisition costs	34	10	32	47	3	126
Underwriting result	138	(45)	75	153	20	341

	Health Insurance €'m 2024	Insurance with profit participation €'m 2024	Index linked and unit linked €'m 2024	Other life insurance €'m 2024	Non-life insurance €'m 2024	Total €'m 2024
Net earned premium	348	40	(4)	709	74	1167
Fee income	1	(10)	106	6	—	103
Total premium and fee income	349	30	102	715	74	1,270
Claims incurred	(81)	(101)	(1)	(361)	(44)	(588)
Change in technical provisions	15	38	(8)	(9)	1	37
Total policyholder benefits	(66)	(63)	(9)	(370)	(43)	(551)
Commission	(129)	(1)	(46)	(180)	(20)	(376)
Other variable expenses	(28)	(8)	—	(75)	(2)	(113)
Total variable expenses	(157)	(9)	(46)	(255)	(22)	(489)
Deferred acquisition costs	22	7	26	27	4	86
Underwriting result	148	(35)	73	117	13	316

The underwriting profit increased by €25m from €316m in 2024 to €341m in 2025. This is mainly driven by the other life and non-life lines of business, partially offset by health insurance and insurance with profit participation lines of business.

The index-linked and unit-linked line of business is mainly consistent with 2024.

The other life line of business has increased primarily due to higher premium in UK group business, partially offset by increases in commissions and claims.

The non-life line of business has increased due to higher premiums in Spain and Slovakia.

For the insurance with profit participation line of business, the underwriting result is depressed due to the cost of meeting the significant levels of investment guarantees historically associated with this business. This impacts the results by increasing the change in technical provisions net of releases on claims. Such cost is offset by investment income not counted in the underwriting result. This line of business is largely in run-off so the relative contribution to the underwriting result will ultimately fall over time.

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	
	2025	2024	2025	2024	2025	2024	2025	2024
	€'m	€'m	€'m	€'m	€'m	€'m	€'m	€'m
Premium and fee income	421	373	557	530	419	368	1,397	1,271
Policyholder benefits	(282)	(237)	(213)	(191)	(154)	(125)	(649)	(553)
Variable expenses	(67)	(59)	(247)	(234)	(219)	(196)	(533)	(489)
Deferred acquisition costs	19	16	35	21	72	50	126	87
Underwriting result	91	93	132	126	118	97	341	316

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

	2025 €'m	2024 €'m
Operating investment income		
Non unit-linked fixed interest securities		
Net interest income	66	69
Investment management expenses	(2)	(1)
Other		
Mortgage loan income	2	4
Total operating investment income	66	74
Non-operating investment income		
Unit-linked assets		
Dividend income	8	10
Net interest income	6	7
Realised gains	56	44
Unrealised gains	61	201
Investment management expenses	2	2
Non unit-linked fixed interest securities		
Realised (losses)	(1)	(1)
Other		
Net (losses)/gains from derivatives	(22)	5
Total non-operating investment income	110	268
Total investment return	176	342

Total investment return decreased by €166m from €342m in 2024 to €176m in 2025.

Non Unit-Linked Fixed Interest Securities

Net interest income decreased slightly this year due to a reduction in yields available on reinvested assets.

Unit-Linked assets

A reduction in unrealised gains was experienced in 2025. This is driven by the performance of equity markets. In Q4 2025 the equity markets experienced modest to steady gains and showed an improvement from the volatility of prior quarters which had been driven by uncertainty regarding ECB interest rates and tariffs and resulted in widened sovereign and credit spreads.

A.3.2 Gains/losses recognised directly in equity

	2025	2024
	€'m	€'m
Investment losses recognised directly in equity	<u>(181)</u>	<u>(171)</u>

Investment losses have increased by €10m from €(171)m in 2024 to €(181)m in 2025. European bond markets in 2025 saw sharp volatility early in the year, driven by the ECB's initial rate cuts, sticky inflation and an April trade shock (US tariffs) that widened sovereign and credit spreads. Late 2025 brought tighter spreads and improved sentiment, supported by Germany's fiscal regime shift. Overall, the market transitioned from uncertainty to steadier conditions, favouring intermediate duration and selective credit exposure for carry-led returns.

Note: Investment gains/losses disclosed in equity in the Irish GAAP financial statements represent the difference between market value and book value on available for sale financial assets.

A.3.3 Investments in securitisations

The Undertaking has no investments in securitisations.

A.4 Performance of other activities

A.4.1 Other Income and Expenses

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

	2025 €'m	2024 €'m
Performance of other activities		
Operating		
Other income	17	16
Expenses	(214)	(205)
Tax	(53)	(30)
Total operating	(250)	(220)
Non-operating		
Expenses	(2)	(14)
Interest on funds withheld	(11)	(58)
Guaranteed fees net of reinsurance	(1)	(6)
Direct interest credited to policyholder account balances	(136)	(267)
Reinsured interest credited to policyholder account balances	11	58
Net Investment gains	—	3
Foreign exchange gains/(losses)	27	(18)
Tax	3	1
Total non-operating	(109)	(301)
Net results from other activities	(359)	(521)

Net results from other activities have increased by €162m from €(521)m in 2024 to €(359)m in 2025.

The variance on total operating results of €30m is mainly due to an increase in tax charges and increases in staff cost and general expenses.

The non-operating expenses variance is due mainly to a reduction in the amortisation of the deferred cost of reinsurance to MetLife Reinsurance Company of Bermuda Limited (MRB). The deferred cost of reinsurance to MRB was part of the transfer of the UK on-shore wealth management portfolio to MetLife UK Limited in Q2 2024.

Interest on funds withheld relates to ceded investment income on the reinsurance treaty with MRB and offsets against the reinsured interest credited to policyholder account balances.

Direct interest credited to policyholder account balances has decreased by €131m. This is driven by the decrease in unit-linked investment income (see section A.3.1).

There was a favourable impact of €45m on the foreign exchange gain/(loss). The movement is mainly due to the impact of GBP-EUR foreign exchange movements on the revaluation of UK EUR surplus assets to the UK branch GBP functional currency. This is partially offset by the related foreign exchange movements on the translation of the UK branch's revalued net assets to the Undertakings EUR reporting currency.

A.4.2 Leases

The Undertaking uses IFRS 16 to measure leases.

In 2025 there was a right-of-use asset on the Solvency II balance sheet of €14m (2024: €13m) and a corresponding liability representing the obligation to make lease payments of €16m (2024: €14m).

Expenses of €7.6m (2024: €6.2m) were incurred in the year in relation to the above leases.

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.:

	2025	2024
	€'000	€'000
MetLife EU	15,110	20,147
Alico US	2,737	1,753
MetLife Europe Insurance d.a.c.	48	1,405
MetLife International Holdings Inc	(11,076)	(11,594)
MetLife Solutions SAS	107	120
Metropolitan Life Insurance Company	474	428
MetLife Services Spain	1	29
MetLife Inc	(4)	(4)
Metropolitan Life SAFFAP S.A.	—	(17)
MetLife Investments Limited	(103)	(72)
MetLife Pension Trustees Limited	—	(1,473)
Agenvita s.r.l.	3,000	2,455
MetLife Europe Services Limited	(3,761)	(3,014)
MetLife Services EEIG	(3,171)	3,640
MetLife Reinsurance Company of Bermuda Limited	(3,246)	(2,537)

A.5.2 Material transactions during the year

The Undertaking paid dividends of €211m to its immediate parent, MetLife EU, in December 2025.

A.5.3 Events after the year end

On 1 January 2026, Bulgaria adopted the Euro as its official currency replacing the Bulgarian Lev. As a result, the functional currency of the Bulgarian branch, Bulgarian Lev, will be replaced by the Euro. The impact of this change is not expected to be material.

In January 2026, the Undertaking entered the Irish market with the launch of a group life product.

B System of governance

B.1 General information on the system of governance

B.1.1 Governance structure

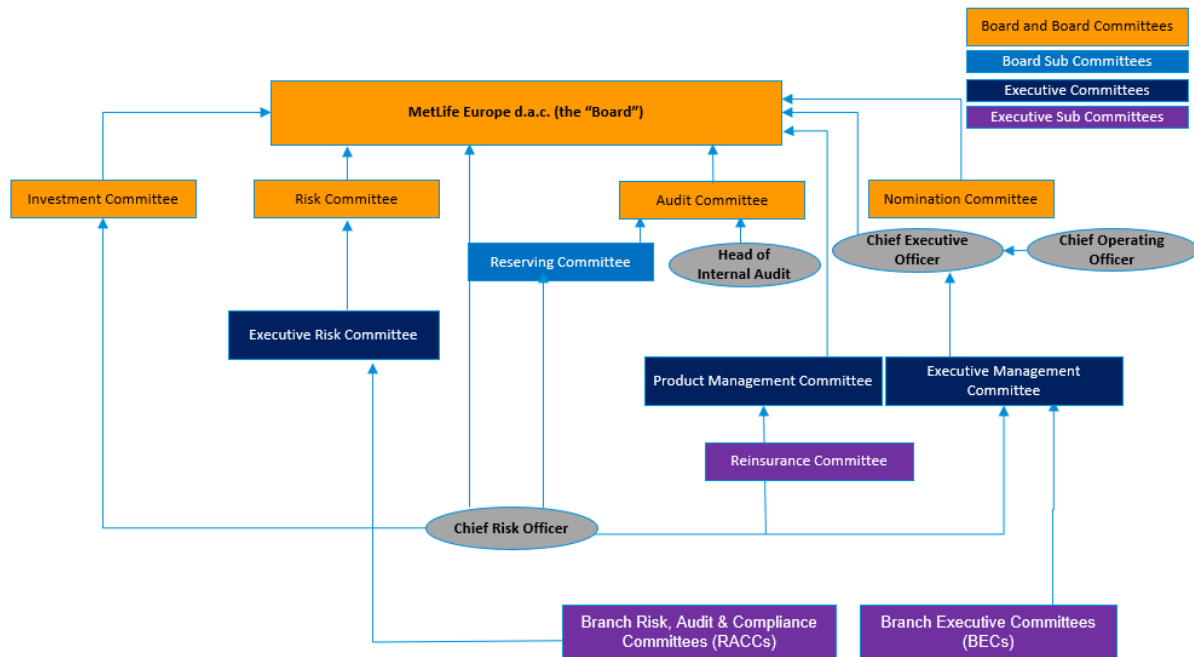
A consistent governance structure is in place across MetLife's European Economic Area (EEA) group of entities, supporting clear decision making, roles and responsibilities. The Corporate Governance Framework (the "Framework") describes corporate governance within the Undertaking. The Framework ensures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

- key organs of the Undertaking (i.e. 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 Framework 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, enable effective risk management and to carry out its activities in a manner reflective of its size and requirements.

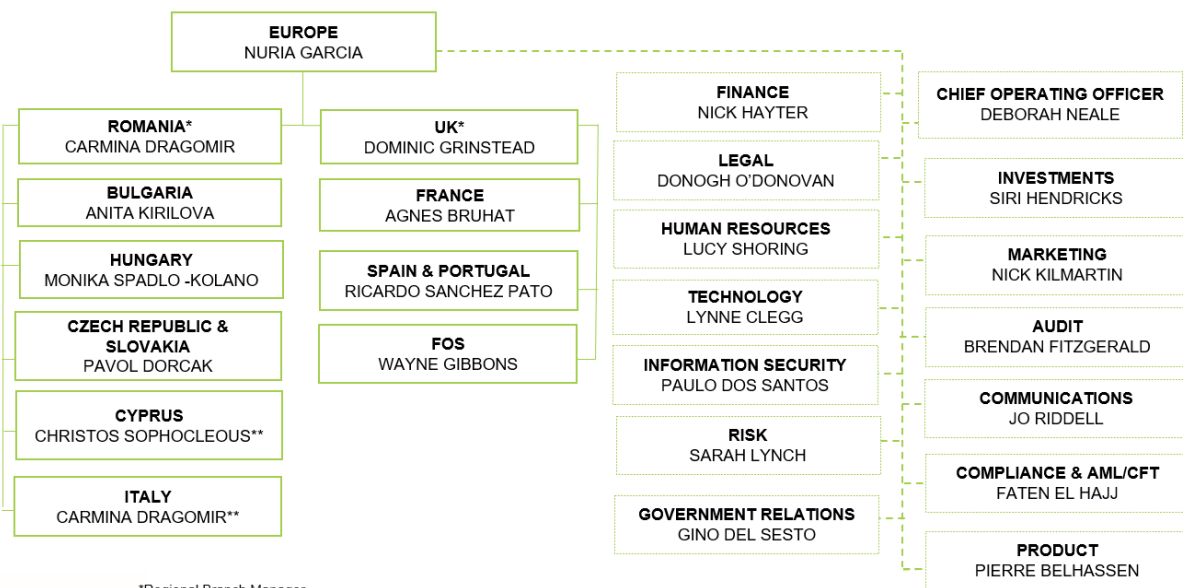
Figure: Undertaking's Corporate Governance Structure



The Corporate Governance Structure is supported by the Executive 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 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 following chart indicates the positions of key function holders within the Executive Management team and their reporting lines.

Figure: Executive Organisational Structure



*Regional Branch Manager
 **Interim Branch Manager

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. The key overarching responsibility of the Board is one of management on an ongoing basis including management of strategic, non-financial, financial and reputational risk to which the Undertaking may be exposed. 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 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 may delegate 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 six times per calendar year and at least three times 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 Chair, 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 Chair. Minuting of all Board meetings follows the Board/Committee minute review process in line with the Framework.

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 and constructive challenge to the deliberations of the Board that is objective and independent of the activities of the executives. Their independence is regularly assessed by the Board.

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.

B.1.4 Matters reserved for the Board

Strategy and Management

- Responsibility for overseeing the management of the Undertaking.
- Approval of the Undertaking's strategic 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.
- Approval of critical and important (Tier One) outsourcing arrangements.

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 financial statements.
- 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.
- Approval of the Risk Management Framework.
- Approval of the ORSA process.
- Approval of the Pre-Emptive Recovery Plan

Non-insurance Contracts

- Approval of material 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 €12,000,000 (or €8,000,000 net of reinsurance, per matter).

- Approval of new bank borrowing facilities.
- Approval of all investment transactions reserved for the Board in the Strategic investment policy.

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 Chair.
- Appointment and removal of the Company Secretary.
- Appointment, reappointment or removal of the external auditor.
- Appointment or removal of Board Committee Chair and members of committees of the Board.
- Appointment or removal from office of Pre-Approved Controlled Functions.

Delegation of Authority

- 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.

Compliance

- Approval of the compliance monitoring programme.
- Approval of the Compliance Statement

Litigation

- Approval and settlement of material litigation matters

Other

- 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, non-financial, 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/her by the Board.

With support of the Chair 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;
- Risk Committee;
- Investment Committee; and
- Nomination Committee.

The Audit Committee

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

The Board Risk Committee

The Board Risk Committee (BRC) is responsible for oversight and to give 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 AC 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 BRC as approved by the Board.

The Investment Committee

The purpose of the Investment Committee (IC) is to assist the Board in fulfilling its statutory and fiduciary responsibilities relating to the oversight of investment management for the Undertaking.

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

The Nomination Committee

The purpose of the Nomination Committee (Nom Co) includes to:

- Consider and make recommendations to the Board on all new appointments of both executive and non-executive directors; and
- Be involved in succession planning for the Board, bearing in mind the future demands on the Undertaking and the existing level of skills and expertise.

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

B.1.7 Main roles and responsibilities of key functions

This section details the roles and responsibilities of the four mandatory 'key functions' of Internal Audit, Compliance, Risk Management and the Actuarial function as well as the roles and responsibilities of the Head of Legal.

The role of Head of Internal Audit

The Head of Internal Audit reports to the Chair of the AC. 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 AC;
- providing timely reports to the AC 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 AC, the BRC and other committees as appropriate;
- providing the AC 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 AC 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 by establishing the Undertaking's Compliance Policies, Procedures, Programmes and Compliance plan. The Head of Compliance is responsible for periodic assessment of the adequacy of the measures adopted by the Undertaking to prevent non-compliance.

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's primary responsibility is to the Board. The CRO reports to the Board periodically and has direct access to the Chair. 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 include but is not limited 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.

The role of Head of Legal

The Head of Legal is a member of the Undertaking's Executive Management and reports to the CEO. The Head of Legal (in collaboration with other functions) plays a key role in identifying and managing any relevant legal and regulatory risk. The role holder also provides legal advice and strategic guidance to the Undertaking on a broad range of topics, such as general corporate activity, litigation, new laws and regulations, re-structuring and corporate governance.

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

The Board is responsible for:

- approving a remuneration policy;
- ensuring that the remuneration policy and remuneration practices are implemented and maintained in line with the Undertaking's business and risk management strategy, its risk profile, objectives, risk management practices and the long-term interests and performance of the Undertaking
- shall incorporate measures aimed at avoiding conflicts of interest
- ensuring the remuneration policy shall promote sound and effective risk management and shall not encourage risk-taking that exceeds the Undertaking's risk tolerance limits; and
- reviewing the remuneration structure for employees of the Undertaking is in line with the risk strategies of the Undertaking.

The Undertaking applies the MetLife Enterprise Compensation Philosophy and associated design standards across all branches. The framework is globally defined and locally implemented to ensure consistency, regulatory compliance, and alignment with the long-term interests of policyholders and shareholders. The remuneration policy forms part of the Undertaking's risk management and governance system and is reviewed annually.

Fixed remuneration

Fixed remuneration consists of base salary and core benefits. Base salaries reflect the responsibilities of the role, individual competencies and experience, and externally benchmarked market data. Fixed pay is set at a level that ensures employees are not unduly dependent on variable remuneration and supports prudent risk-taking.

Variable remuneration

Variable remuneration is delivered through the Annual Variable Incentive Plan (AVIP), designed and governed at enterprise level. Awards consider both enterprise and individual performance against pre-defined objectives.

For individuals in Control Functions, variable remuneration aligns with regulatory expectations for independence: performance goals prioritise functional objectives, risk management responsibilities, and adherence to regulatory standards. Their incentive outcomes are not linked to local business unit financial results, reflecting their enterprise-level remit and the requirement to maintain independence and avoid conflicts of interest.

Long-term incentives

Senior leadership roles may be eligible for long-term incentive awards, including restricted stock units or stock options issued by the ultimate parent company. These awards reinforce alignment with MetLife's long-term performance and strategic priorities.

Retirement and other benefits

Employees have the opportunity to participate in locally compliant pension or retirement benefit schemes and receive benefits in line with market practice in their country of employment.

Governance

The Board oversees the remuneration policy and ensures alignment with Solvency II Delegated Regulation Article 275, the Undertaking's Risk Management Framework, and enterprise compensation standards. The policy supports effective governance by promoting sound and sustainable risk management, preventing excessive risk-taking, and ensuring remuneration outcomes reflect regulatory requirements.

B.1.10 Material transactions with related parties

Material transactions with shareholder

The Undertaking paid dividends of €211m to its immediate parent, MetLife EU in December 2025.

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 as a result of these reviews.

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 performing a Pre-Approval Control function (PCF) or a Control Function (CF) referred to here 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.

The Policy also covers the requirements for the Undertaking to certify annually that each PCF and CF role holder meets the applicable Fitness and probity Standards. The Chief Operating Officer oversees the completions of the Certificate of compliance process by review and sign off where the Fitness and probity requirements are satisfied.

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): A person who holds or performs the duties set out in the Fitness and Probity Standards 2025, and the Central Bank Regulations and guidance. Persons appointed to a PCF must be approved in writing by the CBI, prior to their appointment.
- Control Functions (CFs): Specific functions as set out in the Fitness and Probity Standards, the Central Bank Regulations and guidance. 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.
- Guidance: CBI Guidance on the Standards of Fitness and Probity 2025.
- Responsible Person: Any person performing one or more PCF or CF role.

Assessment of fit and proper

The Undertaking has in place an Individual Accountability/Senior Executive Accountability Regime (SEAR) Framework, which clearly defines responsibilities and decision-making across the firm. The framework is supported by documented governance arrangements, role mapping and policies, and is embedded through annual mandatory training on the Individual Accountability Framework (IAF) Act, including the Conduct Standards, for all in-scope individuals. In addition, processes are in place to support ongoing adherence to the requirements of the Act, including fitness and probity assessments, governance and escalation arrangements, and the certification of all PCF and CF roleholders.

The Undertaking does not permit a person to perform a control function role 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 PCF role holder.

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 PCF/CF role. In addition, checks to ensure compliance with laws and regulations must include appropriate legal review.

Frequency of Assessment

A person proposed to perform a PCF/CF role 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 Risk Framework) sets out the approach to risk management and the structure to be followed by all associates in their capacity as executives, management and staff. The Risk Framework promotes a strong culture and supports effective decision making activities.

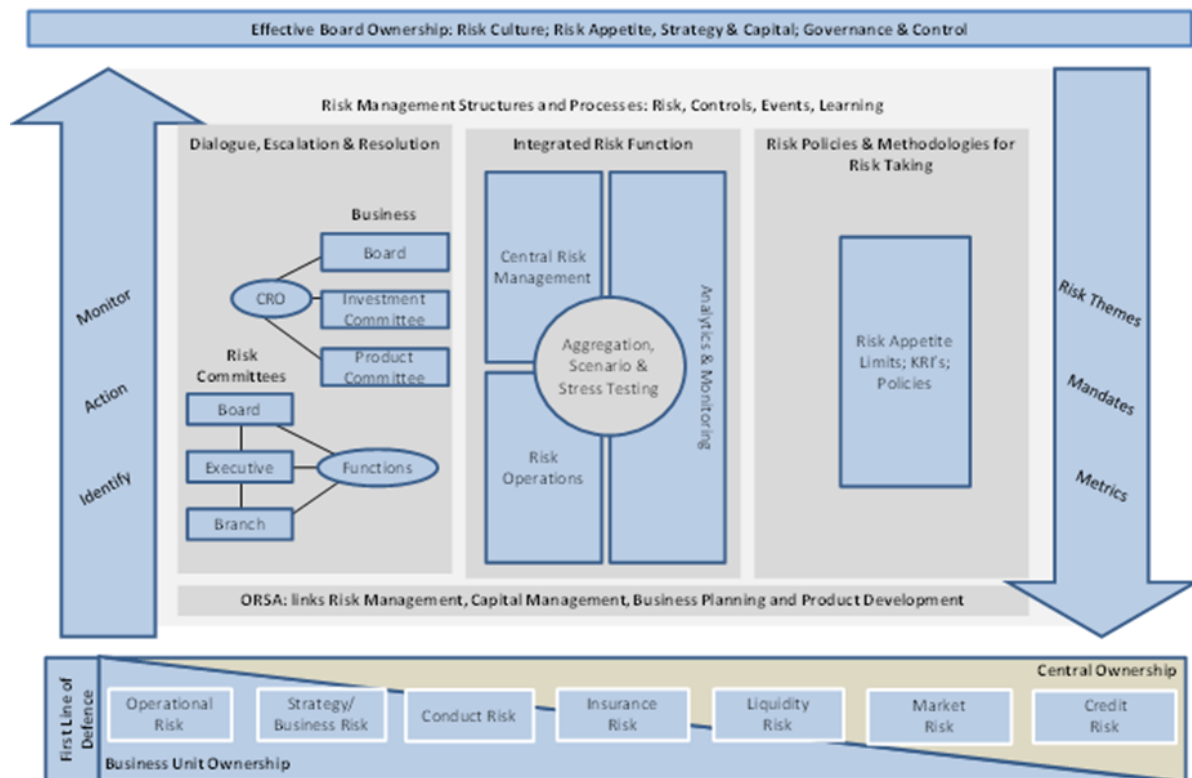
Scope and application

All business activity and decisions are made in the context of, and in compliance with, the Risk 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 Risk Framework as is relevant to their role, and exercise sound judgement to act within the Risk 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 Risk 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 Risk Framework is designed to facilitate, on an ongoing 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



While ultimately the Board owns risk appetite and therefore must control the overall risk profile of the Undertaking, the risk profile is the result of the actions taken by the entire organisation and 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;

- **First Line:** 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 this Framework.
- **Second Line:** The Risk Management and Compliance functions fulfil the second line of defence, by providing the entity, comprehensive and consistent systems, techniques and processes to aggregate, assess and limit the risks the Undertaking faces across different areas.
- **Third Line:** Internal Audit provides independent assurance over the strengths of controls as the third line of defence.

Dialogue, escalation and resolution

A number of interacting committees provide the structures for the dialogue between those deciding over risk exposures, 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 is also a RACC specifically for the FOS Business (FOS RACC).

Risk Management Function

The Undertaking's Risk Function operates a 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 and reputation. The Risk Function's main activities are therefore to provide an integrated and transparent assessment of risks and capital requirements; ensure consistent standards and proper risk governance; participate in management of key risks; and recommend risk appetite and risk limits.

The Risk Function leverages MetLife's Global Risk Management (GRM) Function for 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
- Non-Financial risk management processes, e.g. management of the Non-Financial Risk Assessment (NFRA) process, supporting project risk assessments.
- Leading the ORSA process, reporting and analysis.
- Co-ordinate the annual review and update of the Pre-Emptive Recovery Plan.
- Review and challenge proposals with material risk and capital implications.

Risk policies and methodologies

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. Any potential risk exposure is considered across the wider business, in particular where interdependencies arise across different functions.

Risk policies directly implement the Risk Strategy and Appetite and are approved by the Board.

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 non-financial 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 Non-Financial Risk).

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.

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 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.

The ORSA process is a continuous cycle of assessment and 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 ORSA process is overseen by the ERC and BRC. 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 organisation 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 will link to capital management and should be stressed to ensure robustness over a three 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 ORSA Policy sets out the principles and approaches to the ORSA process to be followed by the Undertaking and applies to all stakeholders involved in the ORSA process. The ORSA Policy sets out the Undertakings approach to stress testing and scenario analysis. It should be read in conjunction with Risk Strategy and Appetite and Risk Management Framework documents. The ORSA process diagram below identifies the key activities that support the production of the ORSA.

The ORSA process diagram below identifies the key activities that support the production of the ORSA:



The results of the ORSA process are communicated to the ERC, the BRC senior management, relevant committees, subsidiary executives and the Board, as well as any other stakeholders for whom the information is relevant. Quantitative ORSA results are provided separately to regulators and are not disclosed in the SFCR.

B.3.4 Pre-Emptive Recovery Plan

The aim of the Pre-Emptive Recovery Plan is to identify and assess the options available to restore financial strength and viability should the Undertaking come under severe stress. It also outlines the governance process, both for the preparation and approval of the plan and for the invocation and execution of the plan in practice.

The Pre-Emptive Recovery Plan identifies and details a range of indicators (Recovery Indicators) that will identify when a risk has the potential to threaten the Undertaking's viability. This includes both early warning indicators, to instigate pre-emptive action to avoid a recovery situation and triggers (Recovery Triggers) which indicate when the Recovery Indicator has been breached and the Undertaking is formally in a recovery situation. The Plan also details how the reporting of these indicators will be incorporated into the regular suite of Risk reporting.

The Pre-Emptive Recovery Plan details the Recovery Options which have been identified by the Undertaking that may be available to assist the Undertaking in a time of distress. They are split into those that relate to capital actions (which may have a liquidity impact) and those that relate to liquidity. The estimated financial impact and feasibility of each of the Recovery Options is assessed and outlined in the Pre-Emptive Recovery Plan, along with an overview of the necessary steps to implement each option. Recovery plan details are provided separately to regulators and are not disclosed in the SFCR.

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 and oversight of the system of Internal Control. It aims to define how effective internal control is achieved and consequently how risks are managed and provide the Board with a sufficient level of assurance that the internal control system is operating effectively.

The Control Framework defines control activities as the policies and procedures that help ensure management directives are carried out and that the necessary actions are taken to address risks to achieve the Undertaking's objectives. Internal Audit must assess controls in relation to the risks being mitigated. The Undertaking's control environment comprises an extensive catalogue of controls that are defined for each function, covering directive, preventative, detective and corrective controls. Control activities include a range of activities as diverse as approvals, authorizations, verifications, reconciliations, reviews of operating performance, security of assets and segregation of duties.

Ongoing monitoring occurs in the ordinary course of operations, and includes regular management and supervisory activities, and other actions personnel take in performing their duties that assess the quality of internal control system performance.

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 using the NFRA process, with material incidents escalated to the relevant Risk Committee.

B.4.2 Description of Compliance Function

The Compliance Function is an integral part of an effective internal control system and the three lines of defence model. The Compliance Function provides strategic advice and challenge to first line, partnering closely with them while fulfilling its responsibilities to key stakeholders, such as customers, shareholders, regulators and employees. The Compliance Function is responsible for delivering a compliance risk framework that enables the Undertaking's lines of business and corporate functions to comply with applicable laws, rules, regulations, and policies, maintain risk levels within MetLife's risk appetite, and integrating compliance principles across the Undertaking's lines of business and corporate functions. The Compliance Function provides constructive challenge to the lines of business and corporate functions, partnering with them to implement processes and controls, as well as to foster a culture of compliance. It conducts risk-based, second line monitoring activities (including NFRA risks and controls) to identify compliance risk and escalates key matters to Management and the appropriate governance bodies.

The compliance risk management framework consists of the following key elements:

- Compliance risk Identification and Prioritisation;
- Compliance risk and Control Assessments;
- Laws and Regulations;
- Monitoring and Testing Programme;
- Metrics and reporting;
- Escalation and Issue Management;
- Policies and Procedures;
- Training.

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 risk management framework. 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 ERC / BRC and ultimately to the Board.

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

- In line with the compliance risk management framework, identification and assessment of compliance risks, including but not limited to, the completion of compliance monitoring and testing activities to ensure independent oversight.
- Regulatory Change Management (in line with the Regulatory Change Procedure):
 - 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 programmes and regulations.
- Reviewing compliance policies, 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 and is the Head of Anti-Money Laundering and Counter Terrorist Financing Compliance of the Undertaking.

B.5 Internal Audit Function

B.5.1 Internal Audit Purpose

The primary role of Internal Audit (IA) is to support the Board and the Executive Management to protect the assets, reputation and sustainability of MetLife. IA is an independent and objective function that provides assurance, advice and insight as to whether the design and operating effectiveness of the Undertaking's framework of risk management, internal control, compliance and governance processes, as implemented and represented by management, is adequate and working effectively

MetLife has adopted a “three lines of defence” risk and internal control framework to ensure that it can execute on the Undertaking's approved strategy while concurrently ensuring that it can fulfil its responsibilities to key stakeholder groups, such as customers, shareholders, regulators and employees.

- a. Business management, as the first line, owns risk identification, together with the design and execution of processes and controls to manage the risk.
- b. Compliance and Risk Management, as the second line, provides input, challenge, oversight and governance.
- c. IA, as the third line, provides independent assurance, reviewing both first and second lines of defence; it should not be relied upon by management as a substitute in whole or in part for either first or second line of defence activity.

At the request of the Audit Committee and Executive Group management, IA may perform advisory services and special reviews related to governance, risk management and controls as appropriate for the Undertaking, providing they do not compromise the role and independent function of IA.

B.5.2 Independence

It is a fundamental requirement for IA to maintain independence and objectivity from the first and second-line management of the business. IA will operate free of conditions that threaten its ability to carry out activities in an unbiased manner and has no direct operational responsibilities or authority for day-to-day business management, the management of risk, and the effectiveness of internal controls. Internal auditors are prohibited from having operational responsibility or authority over areas audited.

B.5.3 Authority

IA derives its authority from the Undertaking's Board, and the Audit Committee to which it has direct access. For the purposes of its work, IA has unrestricted authorisation to access all records, personnel and physical property, and formal meetings and committees relevant to the performance of their assignment in any functional area of the Undertaking and, where contractually authorised, its contractors or suppliers. All employees assist IA in fulfilling its roles and responsibilities. Documents and information given to IA are handled in the same prudent and confidential manner as by those employees normally accountable for them.

B.5.4 Performance

IA must exercise due professional care in the execution and communication 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. IA employs methodology to ensure auditors align with the Standards, and internal auditors are accountable for conforming with the Standards that are relevant to the performance of their job responsibilities. The IIA has also established a Code of Ethics. Auditors are responsible to conduct themselves so that their good faith and integrity are not open to question.

The IA Charter defines IA's purpose, authority and responsibility. This Charter establishes IA's position within the Undertaking, including the nature of the Chief Auditor's (Head of Internal Audit) functional reporting relationship with the Board and administrative reporting to the CEO; authorises access to records, personnel and physical properties relevant to the performance of engagements; and defines the scope of IA activities.

B.5.5 Organisation and Reporting

The Head of Internal Audit has a functional reporting relationship to the Audit Committee and will meet with the Chair of the Audit Committee throughout the year. The Head of Internal Audit also reports administratively to the CEO and has direct and continuing access to the CEO as required. The Head of Internal Audit does not participate in the decision-making process of the Executive Group or Board, but may be invited by the CEO or Board, as the case may be, to attend any meetings and receive any information needed for successful execution of the Head of Internal Audit's function.

B.5.6 Scope of Responsibilities

The Head of Internal Audit is accountable for:

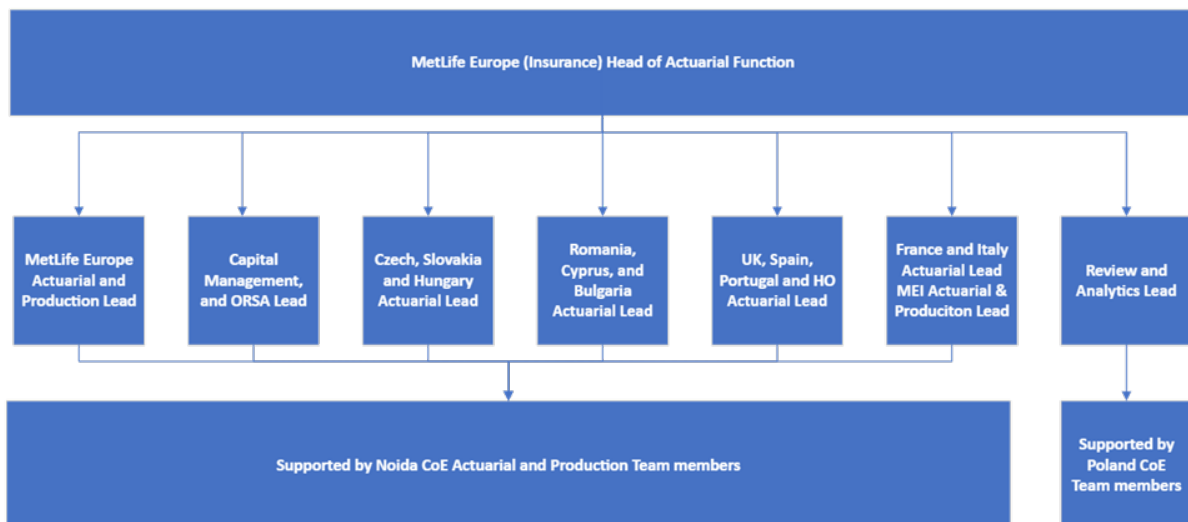
- a. Identifying all auditable areas within the Undertaking;
- b. Proposing a risk-based audit plan that is reviewed and approved by the Audit Committee at least annually. The plan covers key risks, emerging risks and regulatory obligations in line with the MetLife risk management and internal controls framework. Any significant deviation from the approved internal audit plan will be communicated to the Audit Committee through periodic activity reports;
- c. Implementing the approved audit plan, communicating the results, and providing a written report. The Head of Internal Audit is accountable for all reports issued by IA and for deciding to whom and how it will be disseminated;
- d. Monitoring action plans taken by management. IA maintains an audit-issues tracking system to identify the status of significant audit issues and the corrective actions planned by management;
- e. Recruiting, developing and retaining personnel with appropriate skills, knowledge, experience and professional certifications to conduct their duties in an effective and efficient manner. They will maintain their technical competence through an appropriate curriculum of professional training and continuing education;
- f. Contracting for specific expertise when needed for an audit assignment; the audit work remains the responsibility of IA and must be consistent with MetLife, Inc.'s IA Charter; and
- g. Updating the Audit Committee on key audit initiatives, adequacy of resource levels, providing regular updates on the progress of completion of the audit plan, including any changes, and the status of management action plans.

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 slide deck 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) Quarterly Analysis of Earnings slide deck to management providing a more in depth analysis on the Solvency II earnings;
- (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 Head of Actuarial Function consists of the Production Function and the Actuarial Function as outlined in the above chart excluding contractors supporting projects.

The Production Function produces valuation results which are subsequently passed to the Actuarial Function for independent and objective analysis and review before final sign off by the Head of Actuarial Function. Beyond its Solvency II duties as Actuarial Function, the 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 and IT 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 oversees the Third Party Risk Due Diligence and facilitates its completion for all vendors identified as potential outsourcing providers.

All outsourcing is subject to the requirements of the Outsourcing Policy, which, in line with relevant legislation, ensures that all outsourcing arrangements are subject to appropriate due diligence, approval, written agreements and ongoing 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 (MESL) for UK jurisdiction; and
- MetLife Services European Economic Interest Group (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 (Netherlands, UK, Poland, Germany, Portugal, Italy and France)
Storage of policyholder data and policy servicing	Multiple jurisdictions (Netherlands, UK, Spain, Cyprus, Poland, Germany, Portugal, Romania, Italy and France)
Claim handling	Multiple jurisdictions (Netherlands, UK, 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, UK, Portugal and Italy)
Outbound mail services	Multiple jurisdictions (France, Spain, UK, 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.

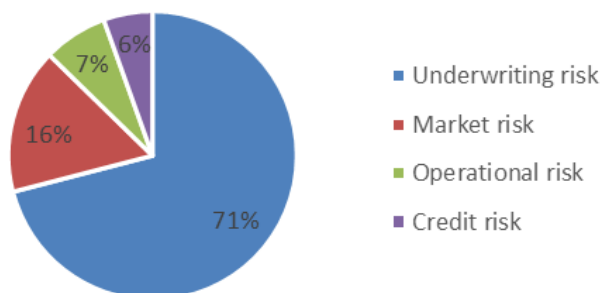
C Risk profile

This section describes the main risks to which the Undertaking is exposed through its business operations.

The Undertaking has a well-diversified risk profile in terms of product mix, distribution channel and location and is monitored on an on-going basis via the risk reporting to the ERC, BRC and the Board. The material aspects of the risk profile that have been brought to the attention of these committees and the Board during the course of the year are outlined in further detail in the below sections.

At 31 December 2025, the breakdown of the Solvency II required capital by risk category was: 71% in Underwriting risk, 16% in Market risk, 7% in Operational risk, and 6% in Credit risk, before diversification and tax adjustments.

Solvency II Required Capital by Risk Category
(before Diversification and Tax Adjustments)



C.1 Underwriting risk

C.1.1 Material exposures

The Undertaking is exposed to underwriting risks in its businesses, including mortality risk, longevity risk, morbidity risk, policyholder-behaviour risk, and expense 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.

Exposures to underwriting risks have increased over the period mainly due to new business and renewals for UK Group Life business. Going forward, exposure to underwriting risks is expected to increase as the Undertaking continues to focus on sales of protection business.

C.1.2 Material risk concentrations

Through its operations, the Undertaking seeks to underwrite a highly diversified and balanced portfolio of underwriting risks. In certain business lines, material geographical risk concentrations can arise. These are monitored and managed as appropriate with catastrophe and mass discontinuance reinsurance.

C.1.3 Material risk mitigation practices

Underwriting risks are primarily mitigated through diversification and single-exposure limits for different components such as mortality and invalidity. Risks in excess of such limits can be accepted but must be reinsured. As mentioned above, catastrophe reinsurance is used to limit the total loss that can be incurred as the result of single events, and to manage risk concentrations. Mass discontinuance reinsurance is also used for risk mitigation purposes.

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 impacts are set out in the following table and explained further below. 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-25
	€'m
Mortality risk	156
Disability risk	119
Lapse risk	525
Expense risk	95
Catastrophe risk	186

Mortality risk (including catastrophe) predominantly arises on Group Life business in the UK and individual term life business in France. Additional exposures to mortality arise in the credit life and individual life businesses across the branches. The SCR for mortality risk has increased over the period mainly due to new business and renewals for UK Group Life business.

Exposure to disability risk arises in the credit life, group income protection (primarily UK) and accident and health businesses. The SCR for disability risk has increased over the period mainly due to new business and renewals for UK Group Life business.

Lapse risk affects the business in different ways depending on the future expected profitability: the Undertaking is generally exposed to the risk of higher lapses (long term trend or mass lapse) on more profitable business and lower lapses on less profitable business. In particular some of the in-force business offers guarantees, i.e. Excess Interest Benefit (EIB), that are currently valuable and generate exposures to lower lapses on such business. The SCR for lapse risk has increased over the period mainly due to new business and renewals for UK Group Life business.

Exposure to expense risk relates to an increase in the level of and inflation on future maintenance expenses in relation to the existing business. This affects all business broadly according to the size of each portfolio. The SCR for expense risk has remained broadly stable over the period.

Catastrophe risk measures the change in the Undertaking's insurance liabilities due to extreme or exceptional events. The SCR for catastrophe risk has increased over the period mainly driven by the UK Group Life due to scheme renewals and top-up premiums, as well as a correction to the calculation of Life Catastrophe Risk SCR in line with the Solvency II Delegated Acts.

Underwriting risk exposures are mitigated as described above.

C.2 Market risk

C.2.1 Material exposures

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 equity markets, either indirectly through revenues that depend on the value of investments covering unit-linked policies or directly through positions held to facilitate policyholder transactions or guarantees provided to policyholders. These risks are identified and assessed as part of the Undertaking's Asset Liability Management (ALM) process, in which all balance sheet values are mapped to their relevant market drivers. 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 exposures to market risks have remained broadly stable over the period.

C.2.2 Material risk concentrations

Market risks are concentrated to the interest rates and investment markets of the Undertaking's major transactional currencies, including Euro, Pound Sterling and the Czech Koruna.

C.2.3 Material risk mitigation practices

Market risks are primarily mitigated through aligning assets and liabilities within agreed tolerances, in particular in terms of currencies and timing of cash flows. Equity exposures from the book of unit-linked policies are managed through product design and selection of suitable investment funds.

The primary risk mitigants in place against currency risk are hedging of the Undertaking's EUR/CZK exposure and residual EUR/GBP exposure. These risk mitigants materially reduce the currency risk exposure of the Undertaking. The market value of these derivatives as at 31 December 2025 is €3.1m.

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, equity levels, property risk and currency values (against the Euro) which are set out in the following table and explained further below. 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-25
	€'m
Interest rate risk	66
Equity risk	76
Property risk	12
Currency risk	44
Concentration risk	23

Interest-rate risk is the risk of loss arising from changes in the level of real or nominal interest rate prices or market implied interest rate volatility levels. The Undertaking is in particular exposed to a drop in interest rates at the long end, as some of the liability cashflows extend beyond the maturity of the asset portfolio. Interest rate risk has increased over the period, mainly due to bond purchases.

Equity risk arises from changes in equity prices (including equity index prices), or market implied equity market volatility levels. The Undertaking's exposure to equity risk relates to unit-linked business

resulting from a fall in unit fund prices following a severe downturn in equity markets. Equity risk has increased over the period largely due to new infrastructure fund investment, as well as improvements in lapse assumptions on unit-linked business in Slovakia.

Property risk arises as a result of sensitivity of assets, liabilities and financial investments to the level or volatility of market prices of property. The Undertaking does not have a material exposure to property risk.

Currency risk is the risk of loss arising from changes in foreign exchange rates or market implied foreign exchange volatility levels. As the Undertaking is a multi-currency business, foreign exchange exposures depend on the performance of liabilities in different currencies and the assets covering them. The Undertaking is exposed to currency risk directly through its operations in non-euro branches and also indirectly through the investments of unit-linked policyholders. The Undertaking's currency risks have reduced mainly due to movements in underlying currency derivatives used for dividend planning.

Concentration risk is the risk relating to accumulation of exposures with the same counterparty. Concentration risk has remained broadly stable over the period.

Market risk exposures are mitigated as described above.

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 primarily from the investment portfolio and from a number of counterparties related to risk mitigation.

These risks are identified and assessed as part of the ALM and reinsurance processes, in which the creditworthiness of the obligors is monitored.

The exposure to credit risk has reduced over the period mainly due to the reduction in corporate bond holdings following the 2025 dividend payment.

C.3.2 Loan portfolio

The Undertaking invests in mortgage loans which are principally collateralised by commercial real estate properties. The credit risk exposure in commercial real estate loans stems from various factors, including the supply and demand of leasable commercial space, creditworthiness of tenants and partners, capital markets volatility and interest rate fluctuations. The exposure is limited by the Investment Guidelines.

In addition, on a limited number of legacy products, loans can be extended to policyholders as long as they are fully covered by the cash value of the policy.

C.3.3 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. Concentrations can arise where the Undertaking's requirements of quality, duration, currency etc. limit the choice of obligors, in particular the Undertaking has a relatively large exposure to government bonds in Romania, Czechia and Hungary for currency matching reasons. These holdings are within risk appetite limits and expected to reduce over time as the EIB business in those countries runs off.

C.3.4 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.

Credit risk, including concentration risk as outlined in the above section, is mitigated through credit rating, funds withheld arrangement and the placement of collateral.

Exposure to changes in credit spreads is mitigated by investing in a diversified and high-quality investment portfolio.

C.3.5 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 and explained further below. The following table shows the sensitivity in the Undertaking's capital requirements if a 1 in 200 year event happened for each risk category.

31-Dec-25

€'m

Spread risk	60
Counterparty default risk	58

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. Spread risk has remained broadly stable over the period. Counterparty default risk has reduced over the period driven by changes in aging of receivables.

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. Given the long-term nature of its business, there are only very few areas in which liquidity risk can arise. These risks are identified and assessed as part of the ALM process. The exposures to liquidity risks have been 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 arising from regular business activities over the course of the liquidity horizon considered. An element of these cashflows relates to the expected profits included in future premiums (EPIFP). The total amount of the EPIFP as calculated in accordance with Article 260(2-4) of the Delegated Acts was €1,180m as at 31 December 2025.

C.4.2 Material risk concentrations

In line with its 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.

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. The results of the liquidity stress tests over the reporting period showed that the Undertaking had sufficient liquidity even in extreme events.

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.

Operational resilience is an Undertaking's ability to identify and prepare for, respond to, and recover and learn from an operational disruption that impacts the delivery of Critical or Important Business Services. The Operational Resilience Framework ensures that the Undertaking can recover its critical or important business services from a significant unplanned disruption, while minimizing impact and protecting its customers and the integrity of the financial system. The core principles of the Operational Resilience Framework are:

- Board and senior management ownership of the Operational Resilience Framework.
- The identification of critical or important business services and all activities, people, process, information, technologies and third parties involved in the delivery of these services.
- The setting of impact tolerances for each of these identified services, and the testing of the Undertaking's abilities to stay within those impact tolerances during a severe but plausible operational disruption scenario.
- The continuous review of how the Undertaking responded and adapted to disruptive or potentially disruptive events so that lessons learned can be incorporated into the operational improvements to continually enhance the operational resilience of the Undertaking.

Business continuity and disaster recovery plans are in place to ensure that employees are aware of the steps they would be required to take in the event of a business disruption or disaster affecting the business processes and technology supporting them. The Undertaking continues to enhance its operational and digital resilience framework, in line with the overall Governance and Risk Management Framework.

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, independently validated by Risk, Compliance using a risk-based approach and Internal Audit functions on a regular basis.

C.5.4 Material risk sensitivities

Each operational risk is rated according to 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 risk heat map. Control remediation action plans are put in place as required.

C.6 Other material risks

This section summarizes the material risks to which the Undertaking is exposed to, providing additional detail in respect of material risks which may relate to those risks covered previously. These risks have been identified through the Undertaking's risk identification and monitoring processes, including the ORSA process described in section B.

Sustainability Risk

Sustainability Risk means an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential negative impact on the value of the investment or on the value of the liability. Certain elements of this risk are difficult to quantify and there is a high degree of uncertainty regarding its ultimate impact. As with Non-Financial Risk, Sustainability Risk is intricately tied to the overall management of the business and is therefore the responsibility of each business unit.

Model, End User Computing and Tool Risk

The Undertaking does not seek to take on Model, End User Computing and Tool Risk but accepts it arises through transacting insurance business. The approach taken is to establish a Model Risk Governance Programme to manage and help mitigate Model, End User Computing and Tool Risk to within an acceptable level.

The Model Risk Governance Programme is led at a MetLife, Inc. level and underpinned by the Enterprise Model Risk, End User Computing (EUC), and Tool Policy. The programme maintains an inventory of Model, End User Computing and Tools (updated and attested to quarterly), requires appropriate risk assessment for each Model, End User Computing and Tool, independent model validation, tracking and escalation of model validation findings, and first line of defence standards for Model, End User Computing and Tool management.

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.

Conduct Risk

The Undertaking is exposed to Conduct Risk through the Undertaking's conduct and that of its associates not being in accordance with the Undertaking's desired culture or defined policies and procedures. The primary areas where this risk could materialise are where actions are taken that benefit an associate(s) and / or the shareholder to the detriment of either a policyholder(s) or our competitors. Conduct Risk is closely linked to NFR, with certain conduct leading to an increased potential for NFR. As with NFR, Conduct Risk is intricately tied to the overall management of a business and is therefore the responsibility of each business unit.

Emerging Risks

The Undertaking is also exposed to emerging and evolving risks and undertakes a top-down semi-annual analysis which provides a holistic view of all external factors that could trigger new risks or opportunities for the Undertaking. An emerging risk register is maintained which incorporates this analysis and the output of the discussions at the ERC, the BRC along with discussions with subject matter experts.

The key emerging and evolving risks facing the Undertaking relate to emerging external factors, in particular:

- **Macroeconomic and geopolitical uncertainty:** Unstable conditions in the global economy and international political landscape that can impact the Undertaking.
- **Lapse risk:** The primary risk relates to increasing lapse rates, particularly the mass discontinuance of profitable contracts with long contract boundaries;

- **Reinsurance risk:** Specifically, the Discontinuance Risk treaty with Canada Life, the Catastrophe treaty with MLIC and ALICO and the Aggregate Mortality Stop Loss treaties with MRB;
- **Regulatory change:** This encompasses a range of areas including but not limited to considerations raised by EIOPA reviews of credit protection insurance and value for money in the unit linked market, the ongoing implementation and supervisory embedding of the Digital Operational Resilience Act (DORA), the application of the EU Artificial Intelligence Act, updated Fitness and Probity Standards and guidance, continued evolution of sustainability and ESG-related regulatory requirements, and further Solvency II reforms following agreement on the Solvency II review;
- **Data risk:** This refers to the potential for loss, harm, or regulatory exposure resulting from the improper handling, quality, security, or governance of data. For the Undertaking, this is particularly critical due to the sensitive nature of customer, financial, and actuarial data.
- **Cyber risk:** Potential for loss, disruption, resulting from the failure of IT systems and digital technologies;
- **Technology risk,** including strategy execution risk and AI risk.

In addition to the risks outlined above, sustainability remains a consideration for the Undertaking with Environmental, Social and Governance (ESG) factors playing a role in shaping our decisions. With regard to climate risk specifically, the Undertaking has continued to strengthen its efforts to understand the impact that climate risk, both physical and transition, may have on its business. The Undertaking continues to make progress on building its scenario analysis capabilities and understanding the potential impact of climate risk on our assets through a combination of qualitative and quantitative analysis.

C.7 Any other information

The material elements of the Undertaking's risk profile are all covered above. 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 2009/138/EC 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 Irish GAAP.

Assets of the Undertaking as at 31 December 2025

Assets	Solvency II value	Reclassification adjustments	Valuation adjustments	Irish GAAP value
	€'m	€'m	€'m	€'m
Deferred acquisition costs	—	—	1,182	1,182
Intangible assets	—	—	14	14
Deferred tax assets	16	—	54	70
Property, plant and equipment held for own use	55	—	(15)	40
Participations and related undertakings	36	—	—	36
Government Bonds	975	(29)	—	946
Corporate Bonds	751	(9)	—	742
Collective Investments Undertakings	42	—	—	42
Deposits other than cash equivalents	5	—	—	5
Assets held for index-linked and unit-linked funds	1,793	(109)	—	1,684
Loans and mortgages to individuals	10	—	—	10
Other loans and mortgages	63	(9)	2	56
Reinsurance recoverables	341	—	191	532
Insurance and intermediaries receivables	142	—	(1)	141
Reinsurance receivables	10	—	—	10
Receivables (trade, not insurance)	46	74	153	273
Cash and cash equivalents	126	105	(1)	230
Any other assets, not elsewhere shown	—	—	2	2
Total Assets	4,411	23	1,581	6,015

The Solvency II liabilities are compared to the Irish GAAP liabilities in section D.3. The valuation differences between the Solvency II and Irish GAAP excess of assets over liabilities is set out in section E.1.2.

The items on Solvency II and Irish GAAP balance sheets may be disclosed in different categories. The 'reclassification' column above includes such amounts where there is a different classification between Solvency II and Irish GAAP. There is no net bottom line reclassification difference between the assets in this section and the liabilities in section D.3.

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 Irish GAAP, 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 is allocated to an Unearned Commission Asset (UCA) to reflect clawback arrangements in place for associated commission payments. As commission is earned, it is moved to DAC. The UCA is disclosed in other assets in Irish GAAP but is not recognised under Solvency II.

Prepaid commission, relating to prepaid renewal commission on the UK Individual Protection business, is also disclosed in other assets in Irish GAAP but 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 Irish GAAP, intangible assets are stated at cost less accumulated amortisation. Intangible assets are recognised if the undiscounted future cash flows exceed the initial cost of the asset. Intangible assets are amortised over their 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, a deferred tax asset (DTA) is 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 DTAs can be realised, the Undertaking considers projected future taxable profits in excess of those profits arising from the reversal of existing taxable temporary differences.

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

The principles under which DTAs and liabilities are recognised under Solvency II are broadly similar to those under Irish GAAP.

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 Solvency II and Irish GAAP balance sheets.

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

	Solvency II	Irish GAAP
	2025	2025
	€'m	€'m
Commission fees allowable in future years	11	10
Other local deferred items	156	83
Premium reserves for claims for non-life insurance contracts	1	1
Property, plant and equipment	(7)	—
Policyholder assets/liabilities	(271)	101
Deferred acquisition costs	33	(218)
Investments	1	18
Other differences between Solvency II and Irish GAAP balance sheet	(28)	—
	<hr/>	<hr/>
Net deferred tax balance	(104)	(5)

Details of Tax Rate Changes:

In 2025, changes to the corporation tax rates were enacted in two ME branches. In the ME Portugal branch, the reduction of the standard corporation tax rate from 20% to 17% will be phased in over three years, decreasing by 1% annually starting in 2026. In the ME Cyprus branch, the increase from 12.5% to 15% will apply from 2026.

Deferred taxes:

As of 31 December 2025, Head Office (DTA of €3.8m) and the following branches are in a net DTA position for Solvency II purposes: Slovakia (DTA of €6.5m), Czech (DTA of €2.8m) and Hungary (DTA of €2m).

All the branches were profitable in 2025 and are expected to continue as such in 2026 and future years. The branches are satisfied they can gain full value for these DTAs as it is probable that taxable profits will be available against which those deductible temporary differences can be utilised. As a result, there is full recognition of these DTAs.

The Bulgaria branch has a DTA recognized on the balance sheet in the local financial statements relating to current and historical net operating losses:

	2025	2024
	€'m	€'m
Bulgaria	0.1	0.3
	<hr/>	<hr/>
Total	0.1	0.3

The Bulgaria branch has historically been profitable and demonstrated ability of utilisation. Based on the available evidence, it is management's expectation that it will continue to be profitable, tax paying, and utilise the remaining losses.

The amount of net DTAs in the above branches is not considered material as of 31 December 2025. Therefore, in accordance with Article 297 of the Delegated Regulation 2019/98, no further description is provided on the underlying assumptions used for the projection of probable future taxable profit.

For all branches in a net DTL position, management expects that the unwind of the DTL position will offset any DTAs on the balance sheet. These branches have a record of profitability and tax payments.

In addition, the following unrecognised DTAs exist in the UK branch and Head Office at year end 2025:

	2025	2024
	€'m	€'m
Ireland	121	115
UK	—	7
Total	121	122

The unrecognised DTA relates to (i) historic losses of €21m and (ii) Foreign Tax Credits (FTC) of €100m for the tax paid by foreign branches of the Undertaking.

Such losses and FTCs have no expiry date, however there is currently no evidence to support recoverability as our expectation for (i) is that these losses are ring fenced and cannot be used by the current business and (ii) is that local taxes paid will always exceed the Irish taxes due.

These items are disclosed in the Irish GAAP accounts also.

The amount of DTAs is not considered material at 31 December 2025. Therefore, in accordance with Article 297 of the Delegated Regulation 2019/981, no description is provided on the underlying assumptions used for the projection of probable future taxable profit.

D.1.4 Property, plant and equipment

D.1.4.1 Property, plant and equipment held for own use

Under Solvency II, property, plant and equipment held for own use is stated at fair value. Certain equipment items may be held at depreciated value if not materially different to the fair value.

Under Irish GAAP, all property, plant and equipment is measured at cost less accumulated depreciation. Accordingly, the two amounts differ on account of the different accounting policies applied.

D.1.4.2 Right-of-use assets

Under Solvency II, right-of-use assets leased by the Undertaking are presented on the balance sheet under property, plant and equipment held for own use. A lease is defined as a contract, or part of a contract, that conveys the right to control the use of an identified asset for a period of time in exchange for consideration. The Undertaking uses IFRS 16 to measure leases whereby right-of-use assets are initially measured at the present value of the lease payments that are not paid at the commencement date and then depreciated on a straight-line basis. This method of measurement is considered an appropriate representation of fair value for Solvency II.

Under Irish GAAP, there is a distinction between finance leases and operating leases. Assets are recognised for finance leases only. Operating leases are not capitalised and the related payments are recognised as an expense in the Statement of Comprehensive Income.

Accordingly, there is a difference between Solvency II and Irish GAAP on account of the different accounting policies applied.

D.1.5 Investments (other than assets held for index-linked and unit-linked contracts)

Under Solvency II, investments are stated at fair value. 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.1.5.1 Holdings in related undertakings, including participations

Under Solvency II, the Undertaking's seed capital holding in MetLife European Infrastructure Debt Fund I is reported at fair value which is determined based on the most recent net asset value (NAV) reported by the fund manager, reflecting the valuation of the underlying infrastructure assets in the fund portfolio.

Under Irish GAAP, this holding is also stated at fair value and, accordingly, there are no differences between Solvency II and Irish GAAP.

D.1.5.2 Equities

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

Unlisted equities are valued using observable inputs where available, including quoted prices for listed equities in active markets for similar instruments, quoted prices for listed equities in markets that are not considered active, and to a lesser extent, matrix pricing, discounted cash flow methodologies or independent non-binding broker quotations. Such instruments are principally valued using the market approach.

Under Irish GAAP, equities are stated at fair value. Accordingly, there are no differences between Solvency II and Irish GAAP.

D.1.5.3 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 Irish GAAP, bonds are stated at fair value. Accordingly, there are no differences between Solvency II and Irish GAAP.

D.1.5.4 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 Irish GAAP, collective investments undertakings are stated at fair value. Accordingly, there are no differences between Solvency II and Irish GAAP.

D.1.5.5 Derivatives

Derivatives are initially recognised at fair value on the date on which a derivative contract is entered into and are subsequently re-measured at their fair value. Certain fair values are obtained from quoted market prices in active markets. When quoted prices are not available, other valuation techniques are applied. The valuation techniques incorporate all factors that market participants would consider and are based on observable market data, to the extent possible.

All derivatives are carried as assets when the fair value is positive and as liabilities when the fair value is negative. Fair value is derived and recorded at the instrument's exit value.

Asset and liability derivatives are shown separately on the balance sheet.

There are no differences between the valuation under Solvency II and under Irish GAAP.

D.1.5.6 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 Irish GAAP, demand deposits are stated at carrying value which approximates to fair value. Accordingly, there is no difference between the two amounts.

D.1.6 Assets held for index-linked and unit-linked contracts

Under Solvency II, assets held for index-linked and unit-linked contracts are stated at fair value.

Index-linked and unit-linked funds comprise of the various categories of investments and other assets described herein, principally investment funds. For disclosure of the valuation methodology used for these assets, please refer to the relevant notes in this section.

Under Irish GAAP, assets held for index-linked and unit-linked contracts are stated at fair value. Accordingly, there is no difference between the two amounts.

D.1.7 Loans and mortgages

Policy loans are valued at amortised cost under Solvency II and Irish GAAP. This is not considered materially different to fair value.

Under Solvency II, commercial mortgage loans are stated at fair value. Certain individual mortgage loans may be held at unpaid principal value adjusted for any deferred fees, if not materially different to the fair value.

Under Irish GAAP, mortgage loans held-for-investment are stated at unpaid principal balance, adjusted for any deferred fees. Accordingly, there are differences in the valuations of loans and mortgages on the two balance sheets.

Other loans also comprise intercompany loans with fixed or determinable payments. Under Solvency II, these are stated at fair value. Under Irish GAAP, these are measured at amortised cost using the effective interest method, less any impairment. This is not considered materially different to fair value. Accordingly, there are no differences between Solvency II and Irish GAAP.

D.1.8 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 Irish GAAP, reinsurance recoverables are valued using the same methods used to calculate technical provisions and, accordingly, there are differences between the value of reinsurance recoverables on the two balance sheets.

D.1.9 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 Irish GAAP, receivables and other assets are recorded at cost less any irrecoverable amounts and are an approximation of the fair value of these assets.

D.1.10 Reinsurance receivables

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

Under Solvency II, these are stated at fair value.

Under Irish GAAP, receivables and other assets are recorded at cost less any irrecoverable amounts and are an approximation of the fair value of these assets.

D.1.11 Receivables (trade, not insurance)

Under Solvency II, these are stated at fair value.

Under Irish GAAP, trade receivables are recorded at cost less any irrecoverable amounts and are an approximation of the fair value of these assets.

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

D.1.12 Cash and cash equivalents

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

Under Irish GAAP, cash and cash equivalents and bank overdrafts are stated at carrying value which approximates to fair value.

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

D.1.13 Any other assets

Under Irish GAAP, the net cost of reinsurance at inception of the contract is deferred and amortised over the remaining life of the reinsured contracts.

Under Solvency II, deferred cost of reinsurance does not represent a recognisable asset. The net cost of reinsurance is recognised as a decrease in eligible own funds in the period in which it occurs. Accordingly, the two amounts differ on account of the different accounting policies applied.

D.1.14 Any other information on assets

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
	2025	2025	2025	2025	2025
	€'m	€'m	€'m	€'m	€'m
Assets held for index-linked and unit-linked funds (excluding outstanding trades)	1,619	162	—	12	1,793
Cash and cash equivalents	126	—	—	—	126
Corporate Bonds	—	727	—	24	751
Deposits other than cash equivalents	5	—	—	—	5
Government Bonds	27	948	—	—	975
Collective investment undertakings	30	—	—	12	42
Loans on policies	—	—	—	10	10
Other loans & mortgages	—	—	—	63	63
Participations and related undertakings	—	—	—	36	36
Property, plant & equipment held for own use	—	—	—	55	55
Grand Total	1,807	1,837	—	212	3,856

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 is equal to the sum of a best estimate liability (BEL) and a risk margin. The methodology employed in the calculation of the BEL 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 technical provisions. The approach to segmentation is covered in section D.2.1.

The BEL is 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.

In respect of the Undertaking, the following are the main lines of business:

- Other life insurance;
- Insurance with profit participation;
- Index-linked and unit-linked life insurance;
- Similar to Life Techniques (SLT) Health insurance;
- Non-SLT Health insurance; and
- Other non-life insurance.

D.2.2 Technical provisions split by line of business

Technical provisions split by gross and net of reinsurance

Illustrated below is a breakdown of gross and net technical provisions by line of business. The 2025 and 2024 numbers below are the Technical Provisions under the Risk-Free plus Volatility Adjuster basis in line with the reported Solvency II results:

Line of business	Gross of Reinsurance	Reinsurance Relief	Net of Reinsurance	Gross of Reinsurance	Reinsurance Relief	Net of Reinsurance
	2025 €'m	2025 €'m	2025 €'m	2024 €'m	2024 €'m	2024 €'m
Insurance with profit participation	989	(2)	987	1,100	(1)	1,099
Index-linked and unit-linked insurance	1,491	(126)	1,365	1,321	(141)	1,180
Other life insurance	241	(129)	112	264	(143)	121
Accepted reinsurance	1	—	1	1	—	1
Health insurance (direct business)	(65)	(79)	(143)	(43)	(81)	(124)
Total Life	2,657	(336)	2,321	2,643	(366)	2,277
Medical expense insurance	10	(2)	8	10	(2)	8
Income protection insurance	(6)	(2)	(8)	(4)	(1)	(5)
Workers' compensation insurance	1	(1)	—	1	(1)	—
Total Non-Life	5	(5)	—	7	(4)	3
Total Technical Provisions	2,662	(341)	2,321	2,650	(370)	2,280

Gross technical provisions split by BEL and Risk Margin

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

The 2025 and 2024 numbers below are the Technical Provisions under the Risk-Free plus Volatility Adjuster basis in line with the reported Solvency II results:

Line of business	BEL	Risk Margin	Gross Technical Provision under Solvency II	BEL	Risk Margin	Gross Technical Provision under Solvency II
	2025	2025	2025	2024	2024	2024
Insurance with profit participation	962	27	989	1,076	24	1,100
Index-linked and unit-linked insurance	1,448	43	1,491	1,283	39	1,322
Other life insurance	136	105	241	167	97	264
Accepted reinsurance	1	—	1	1	—	1
Health insurance (direct business)	(113)	48	(65)	(87)	43	(44)
Gross Total Life	2,434	223	2,657	2,440	203	2,643
Medical expense insurance	8	2	10	8	2	10
Income protection insurance	(15)	9	(6)	(15)	11	(4)
Workers' compensation insurance	1	—	1	1	—	1
Gross Total Non-Life	(6)	11	5	(6)	13	7
Total Gross Technical Provisions	2,428	234	2,662	2,434	216	2,650

Gross technical provisions increased by €12m from €2,650m in 2024 to €2,662m in 2025. Net technical provisions increased by €41m from €2,280m in 2024 to €2,321m in 2025. This increase in net technical provisions was primarily due to a decrease in reinsurance relief and an increase in gross technical provisions:

- The overall gross technical provisions increase of €12m over the year is mainly driven by:
 - An increase in unit linked liabilities owing to new business sales and positive equity market performance.
 - Partially offset by new business sales of regular premium products with negative reserves across the Undertaking and annual assumption updates.
- Reinsurance relief decreased by €29m driven by new business sales of products with negative reserves.
- Together, the two movements above resulted in an increase in net technical provisions of €41m.

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 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 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. For the Variable Annuity portfolio the liability projection software projects to the term plus 1 year for each individual model point.

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, charges and other policyholder payments. 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, unit-linked benefits and tax payments.

D.2.3.8 Life insurance obligations

Cash-flow projections used in the calculation are made separately for each policy, except where grouping of model point files is used. Material grouping is used in the following branches:

- Italy
- Spain
- Romania
- Slovakia
- France

It should be noted that there are no significant differences in the nature and complexity of the risks underlying the policies that belong to the same grouping. The grouping of policies does not misrepresent the risk underlying the policies and does not misstate the expenses.

No explicit surrender value floor has been assumed for the market consistent value of liabilities for a contract.

D.2.3.9 Non-life insurance obligations

The non-life insurance business is small in relation to the life business.

D.2.3.10 Valuation of future discretionary benefits

The calculation of the best estimate takes into account future discretionary benefits which are expected to be made. The value of future discretionary benefits is calculated separately.

The material future discretionary benefits which are expected to be paid by the Undertaking are in relation to the EIB payments on European participating business. This benefit is attached to a number of different blocks of endowment, pure endowment and whole of life business.

The EIB is a benefit uplift which is generally calculated as the excess of the declared yield over the guaranteed rate. The declared yield is based on the investment return of specific pools of assets.

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.

Where the timing of recoveries and 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 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.

D.2.5 Discounting

The Undertaking uses the volatility adjusted risk free rates for the valuation of its Euro liabilities and risk-free rates for its remaining liabilities. The above approach is used consistently through the Solvency II Balance Sheet, Own Funds, SCR and MCR.

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 a fair value adjustment that captures the cost of holding the unhedgeable part of the SCR over the lifetime of the policies in force. It is added to the BEL which together make the technical provisions. Market risks are deemed hedgeable and are therefore excluded from this calculation. Determination of the risk margin therefore entails a projection of the unhedgeable part of the SCR over the run-off of the in-force business.

For the purposes of calculating the risk margin, the SCR refers to non-hedgeable risks only (the implicit assumption being that a third-party purchasing company will hedge or mitigate all avoidable risks).

The following risks are considered key and cover over 80% of the risk margin: Mortality, Morbidity, Lapse, Expenses, Catastrophe and Operational.

The non-hedgeable SCR components are discounted using 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. There is no modelling of the paid-up decrement on the grounds of proportionality. It is complex to model and is assumed to be broadly equivalent financially to the surrender of the contract.

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 a periodic basis.

The key assumptions concerning the future, and other key sources of estimation uncertainty at the reporting date, are discussed below.

Key sources of estimation uncertainty

1. Unit-linked contracts

Unit-linked account values

Liabilities for insurance and investment contracts include unit reserves at market value and unallocated premiums. The unit reserves are equal to the sum across unit funds of the numbers of policyholder units multiplied by the unit price (at bid price). Unallocated premiums are premiums that have been issued but not yet allocated to units. The value of the unit reserves are known and contain no uncertainty.

BEL

The BEL represents the unit reserves plus the present value of future benefits in excess of the unit reserves, to be paid to the policyholders or on behalf of the policyholders and related expenses less the present value of future charges deducted from the unit-linked account.

Key assumptions used in calculating the BEL include:

- Expected future economic conditions (including risk-free interest rates, inflation rates and reinvestment rates);
- Maintenance expenses and associated inflation;
- Mortality / morbidity rates based on selected published actuarial mortality tables; and
- Lapse rates based on expected surrender experience.

2. Non unit-linked contracts

The liabilities represent the present value of future benefits 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 BEL, are discussed below.

Key assumptions used in calculating the BEL include:

- Expected future economic conditions (including risk-free interest rates, inflation rates and reinvestment rates);
- Maintenance expenses and associated inflation;
- Mortality / morbidity rates based on selected published actuarial mortality tables; and
- Lapse rates based on expected surrender experience

Such assumptions are captured in more detail in sections D.2.3 and D.2.15.

Expert judgement

Expert judgement is necessary in the calculation of the BEL for a number of reasons including the following:

- Selection of data to use, and adjustment to reflect current or future conditions, correcting errors and deciding on the treatment of outliers or extreme events;
- Selection of realistic assumptions, allowing appropriately for the environment in which the Undertaking operates;
- Selection of the valuation technique considering appropriate alternative methodologies.

D.2.10 Matching adjustment

This is not applicable to the Undertaking.

D.2.11 Volatility adjustment

The Undertaking applies volatility adjustment on the Euro risk-free interest rate term structure in accordance with Article 77d of Directive 2009/138/EC.

The volatility adjustment is applicable to all Euro-denominated branches within the Undertaking (namely Cyprus, France, Italy, Portugal, Slovakia and Spain) and Euro liabilities from one non-Euro denominated country (Bulgaria), comprising together 99% of the Undertaking's Euro liabilities. The application of the volatility adjustment was approved by CBI for first use at 31 December 2020.

The EUR volatility adjustment has decreased from 23bps to 14bps over the year and had an impact of €7.6m on the Technical Provisions. The effect of the application of the volatility adjustment as at 31 December 2025 is as below:

	Volatility Adjusted Risk-Free Rates	Risk-Free Rates	Impact	% of Impact
	€'m	€'m	€'m	€'m
Total Liabilities	3,305	3,313	(8)	(0.22)%
Solvency Capital Requirement	731	731	—	(0.04)%
Minimum Capital Requirement	329	329	—	—%
Basic Own Funds	1,104	1,097	7	0.69%
Own Funds Eligible to cover the SCR	1,104	1,097	7	0.69%
Own Funds Eligible to cover the MCR	1,089	1,081	8	0.70%

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 Irish GAAP

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	Other life insurance	Insurance with profit participation	Index-linked and unit-linked life insurance	SLT Health insurance	Non-SLT Health insurance	Total
	2025	2025	2025	2025	2025	2025
	€'m	€'m	€'m	€'m	€'m	€'m
Gross Technical Provisions under Irish GAAP	913	1,207	1,600	797	19	4,536
Assumption and Methodology Differences	(776)	(245)	(152)	(910)	(26)	(2,109)
Items in Solvency II not in Irish GAAP (Risk Margin)	105	27	43	48	12	235
Gross Technical Provisions under Solvency II	242	989	1,491	(65)	5	2,662

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

Assumption and Methodology Differences

Solvency II and Irish GAAP 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 Irish GAAP generally does not. Irish GAAP valuation of non-linked business adopts a net premium valuation methodology on regular premium business. For unit-linked type contracts, reserves typically equal the account values with no allowance for future profits. Exceptions exist for contracts with guarantees.

Items in Solvency II but not in Irish GAAP

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 Irish GAAP.

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 estimates. 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 ranked from the highest to the lowest as follows: lapses, mortality, expenses, morbidity. The primary lines of business contributing to these assumptions relate to the Czech, France, UK and Italy.

General Assumption Notes

1. Demographic Assumptions

Mortality and morbidity 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 some cases the table will be provided by a reinsurer.

Lapse, surrender and persistency assumptions tend to be Undertaking specific but may be influenced by market data.

Whilst results on long term risk or annuity business may be relatively sensitive to demographic experience (mortality / morbidity), results tend to be more sensitive to policyholder behaviour due to the much higher absolute level and volatility of rates (e.g. lapse rates typically in the range 2% to 15%).

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.

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.

There are also asset volatility assumptions used in Economic Scenario Generators. These too are constrained by the risk neutral framework, subject to certain discretionary calibration choices beyond the scope of the present document.

Further details on the principal assumptions are below:

D.2.15.1 Mortality

Mortality rates are set at a country and product level. Base mortality rates are taken from country specific standard industry tables, which vary by age and sex. Depending on the product, experience multipliers and selection factors may also be applied to bring the assumptions in line with our own experience.

Where standard tables are not available in a certain country, tables from an alternative country have been used which best match the experience.

For certain products, separate mortality rates are used for accidental death and death caused by disease and sickness.

D.2.15.2 Morbidity

Morbidity incidence rates are set at a country, product and coverage level. The following split of coverages is used in the models:

- Child Protection Agreement
- Waiver of Premium
- Permanent Disability
- Temporary Disability
- Critical Illness
- Hospitalization

Base morbidity rates are taken from country specific standard industry tables which vary by age and sex. Depending on the product, experience multipliers and selection factors may also be applied to bring the assumptions in line with our own experience.

Where coverage specific standard tables are not available one of two approaches has been used to set the assumptions. The first approach is to look for similar standard tables in other countries. The second approach is to develop bespoke tables based on specific experience.

For products with undefined benefit amounts (e.g. hospital cash), average claim amounts are used in the projection.

D.2.15.3 Persistency

Lapses

Lapse rates are set for each country within the Undertaking and are defined at a product, premium type (regular or single), distribution channel and policy year level.

Lapses for investment rider, child protection agreement and waiver of premium products depend on underlying products.

D.2.15.4 Expenses

D.2.15.4a. Expense assumption

Expenses are split into acquisition and maintenance expenses. Expenses can be modelled as fixed, as a percentage of premium, as a percentage of sum assured or as a percentage of mathematical reserves. Expenses can vary by country, currency, product, premium type and distribution channel.

D.2.15.4b. Expense inflation assumption

Maintenance and overhead expenses are adjusted based on inflation assumptions.

D.2.15.4c. Commission assumption

Commissions are defined for each country within the Undertaking and are split into initial and renewal commissions. Depending on the product, bonus commission and override commission may be included. Commission rates depend on product, premium payable year, policy year and distribution channel. All standard commission rates are calculated as a percentage of premium.

Commission is not generally an assumption subject to discretionary judgement, rather it is a well-defined parameter of the relevant product.

D.2.15.5 Premium Indexation

For certain products, indexation is applied as a percentage increase in premiums over each projection year.

D.2.15.6 Benefit Escalation

For certain products, escalation is applied as a percentage increase in benefits over each projection year.

D.2.15.7 Interest Rate

D.2.15.7a. Interest rate assumption

The yield curves are generated in line with the prescribed methodology. The risk-free interest rate is primarily derived from the rates at which two parties are prepared to swap fixed and floating interest rate obligations. In the absence of financial swap markets, or where information on such transactions is not sufficiently reliable, the risk-free interest rate is based on the government bond rates of the country.

The risk-free interest rates are:

- Calculated for different time periods, reflecting that the liabilities of insurance and reinsurance undertakings stretch years and decades into the future.
- Calculated in respect of the most important currencies for the EU insurance market.
- Adjusted to reflect that a portion of the interest rate in a swap transaction (or a government bond) will reflect the risk of default of the counterparty and hence without adjustment would not be risk free.
- Based on data available from financial markets. For those periods in the more distant future for which data is not available, the rate is extrapolated from the point at which data is available to a macroeconomic long-term equilibrium rate.

The volatility adjustment (VA) is applied as an increase to the risk-free (RF) liability discount rate and is published by EIOPA with the risk-free rates on a monthly basis. The adjustment is based on the credit spreads observed on representative “reference portfolios” of bonds and varies by currency and country. It is broadly equal to 65% of the excess spread over risk-free (i.e. 65% of “total market yield minus risk-free minus allowance for credit risk”). The volatility adjustment is level up to the last liquid point (20 years for Euro) after which it begins to reduce as the overall discount rate (risk-free plus volatility adjustment) progressively converges to the ultimate forward rate.

D.2.15.7b. Credited rate/EIB

Certain products contain an EIB feature where policyholder benefits may receive an uplift each year depending on the performance of a portfolio of assets allocated to that business.

The future projected yield on these assets is calculated using risk neutral market consistent rates.

D.2.15.7c. Reversionary and terminal bonuses

This is not applicable to the Undertaking.

D.2.15.8 Fund Growth - Unit Linked

The assumed growth rate of unit-linked funds is consistent with the relevant risk-free interest rate term structure.

D.2.15.9 Discount Rate/Illiquidity Premium

This is consistent with section D.2.15.7. No illiquidity premiums are allowed for in any country.

D.3 Other liabilities

Liabilities of the Undertaking as at 31 December 2025

Liabilities	Solvency II value	Reclassification differences	Valuation differences	Irish GAAP value
	€'m	€'m	€'m	€'m
Technical provisions - Non-life	5	—	14	19
Technical provisions - Life	2,657	—	1,860	4,517
Provisions other than technical provisions	11	—	—	11
Deposits from reinsurers	128	—	—	128
Deferred tax liabilities	120	—	(45)	75
Derivatives	2	—	—	2
Debts owed to credit institutions	7	—	—	7
Insurance and intermediaries payable	200	—	5	205
Reinsurance payables	65	—	—	65
Payables (trade, not insurance)	94	23	—	117
Financial liabilities	16	—	(16)	—
Total Liabilities	3,305	23	1,818	5,146
Excess of assets over liabilities	1,106	—	(237)	869

The Solvency II assets are compared to the Irish GAAP assets in section D.1. The valuation differences between the Solvency and Irish GAAP 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 Irish GAAP, 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 Irish GAAP.

D.3.2 Deposits from reinsurers

Deposits from reinsurers refers to cash collateral provided by a reinsurer to cover insurance liabilities and funds withheld arrangements with reinsurers.

Under Solvency II, deposits from reinsurers are stated at fair value on the Solvency II balance sheet

Under Irish GAAP, deposits from reinsurers are recorded at cost and are an approximation of the fair value of these liabilities. Accordingly, there are no differences between Solvency II and Irish GAAP.

D.3.3 Deferred tax liabilities

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

D.3.4 Derivatives

Under Solvency II, derivative liabilities are measured at fair value. The valuation methodology for derivatives is set out in D.1.5.5.

There are no differences between the valuation under Solvency II and under Irish GAAP.

D.3.5 Insurance and intermediaries payables

This relates to amounts due to policyholders, insurers and other business linked to insurance.

Under Solvency II, these are stated at fair value.

Under Irish GAAP, such short-term payables are recorded at cost which is an approximation of the fair value of these liabilities.

D.3.6 Reinsurance payables

Reinsurance payables relates to amounts payable to reinsurers on claims and commissions settled to policyholders.

Under Solvency II, these are stated at fair value.

Under Irish GAAP, such short-term payables are recorded at cost which is an approximation of the fair value of these liabilities.

D.3.7 Payables (trade, not insurance)

Under Solvency II, these are stated at fair value.

Under Irish GAAP, trade payables are recorded at cost and are an approximation of the fair value of these liabilities.

D.3.8 Other financial liabilities

D.3.8.1 Leasing

A lease is defined as a contract, or part of a contract, that conveys the right to control the use of an identified asset for a period of time in exchange for consideration.

Under Solvency II, lease liabilities should be initially measured at the present value of the lease payments that are not paid at the commencement date and then subsequently amortised using the effective interest method.

Under Irish GAAP, there is a distinction between finance leases and operating leases. Only finance leases are recognised as lease liabilities while payments on operating leases are recognised as an expense in the Statement of Comprehensive Income.

Accordingly, lease liabilities differ between Solvency II and Irish GAAP due to the different accounting policies applied.

D.3.8.2 Employee benefits

A portion of pension costs are allocated from MetLife Services EEIG (Ireland) and MESL (UK) 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 invested 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 as incurred. The Undertaking does not operate a defined benefit pension plan.

D.3.9 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.3.10 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.1.5.3.

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 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 ongoing 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 Irish GAAP 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 Irish GAAP. The table summarises the differences at 31 December 2025:

	Section	31-Dec-25 €'m	31-Dec-25 €'m
Assets under Irish GAAP valuation	D.1	6,015	
Liabilities under Irish GAAP valuation	D.3	(5,146)	
Equity per the Irish GAAP financial statements			869
<hr/>			
· Valuation differences on technical provisions (net)	D.2	1,683	
· Write off of deferred acquisition costs	D.1.1	(1,182)	
· Write off of intangible assets	D.1.2	(14)	
· Net unearned commission	D.1.1	(145)	
· Net deferred tax	D.1.3	(99)	
· Adjustment to loans and mortgages	D.1.7	(2)	
· Economic value adjustment to properties	D.1.4	(1)	
· Other adjustments	D1.13	(3)	
			237
<hr/>			
Assets under Solvency II valuation	D.1	4,411	
Liabilities under Solvency II valuation	D.3	(3,305)	
Excess of assets over liabilities under Solvency II			1,106
<hr/> <hr/>			

Valuation differences occur due to different basis used for Solvency II reporting compared with Irish GAAP. 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 DTAs of €16m (2024: €21m), 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	4,379,124
Mandatory service costs	None
Absence of encumbrance	Yes

E.1.5 Movement in own funds

Illustrated below is the movement in own funds.

	31-Dec-25	31-Dec-24	Movement
	€'m	€'m	€'m
Basic own funds			
Tier One	1,090	1,064	26
Tier Two	—	—	—
Tier Three	16	21	(5)
Total basic own funds	1,106	1,085	21

The Undertaking has no ancillary own funds.

Own funds increased by €21m from €1,085m to €1,106m.

The increase in own funds is primarily driven by the positive impact of contract boundary renewals in UK A&H business; new business and renewals in Slovakia, France and Czech Republic; positive claims experience in UK and Italy; and the impact of actuarial assumptions updates. The largest offsetting movement was the payment of a dividend of €211m to MetLife EU in December 2025.

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

Illustrated below is the eligible amount of own funds to cover the SCR and MCR.

	31-Dec-25	31-Dec-24	Movement
	€'m	€'m	€'m
Total own funds	1,106	1,085	21
Less:			
Restrictions	—	—	—
Deductions	—	—	—
Total eligible own funds for SCR	1,106	1,085	21
SCR	731	673	58
Solvency Ratio	151%	161%	(10)%
Total eligible own funds for MCR	1,090	1,064	26
MCR	329	303	26

The Undertaking has no restrictions on eligible own funds. Tier 3 own funds consist of DTAs. These are all considered eligible as they make up less than 15% of the SCR.

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	Amount
	31-Dec-25	31-Dec-24
	€'m	€'m
Excess of assets over liabilities	1,106	1,085
Own shares (included as assets on the balance sheet)		
Forseeable dividends, distributions and charges		
Other basic own funds items	(20)	(26)
Adjustment for restricted own fund items of Matching Adjustment Portfolios (MAPs) and Ring Fenced Funds (RFFs)		
Reconciliation reserve before deduction for participations	1,086	1,059

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 - Ring Fenced 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.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 Standard Formula (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.

Use of Volatility Adjustment

The volatility adjustment is applicable to all Euro-denominated branches within the Undertaking (namely Cyprus, France, Italy, Portugal, Slovakia and Spain) and Euro liabilities from one non-Euro denominated country (Bulgaria), comprising together 99% of the Undertaking's Euro liabilities. The application of the volatility adjustment was approved by the CBI for first use at 31 December 2020.

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 the 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:

$$\text{SCR} = \text{BSCR} - \text{Adj} + \text{SCR}_{\text{op}}$$

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 need to be calculated. The cashflows for each of these scenarios are 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 BEL component of the technical provisions). Furthermore when calculating ΔNAV the following are allowed for:

- Risk mitigation techniques
- Adverse changes in the option take-up behaviour of policyholders.
- For collective investment funds, a look through approach has been used to assess the risk applying to the underlying investment vehicle. Where a collective investment fund is not sufficiently transparent to allow for a reasonable best effort allocation, reference has been made to the investment mandate.

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 and non-SLT health insurance business are based on expected premiums for the next twelve months. The stress scenarios for underwriting risks in life insurance and SLT health insurance are instantaneous and do not allow for future new business.

E.2.3 SCR and MCR results

SCR

The following table includes the SCR components.

	31-Dec-25	31-Dec-24
	€'m	€'m
SCR Market risk	172	170
SCR Health risk	185	166
SCR Counterparty Default risk	58	70
SCR Life Underwriting risk	563	503
Aggregation (diversification effect)	(252)	(244)
Basic SCR	726	665
Operational risk SCR	76	72
Adjustment for the loss absorbing capacity of future discretionary benefits	—	—
Adjustment for the loss absorbing capacity of deferred taxation (LACDT)	(71)	(64)
Diversified SCR, excluding capital add-on	731	673
Capital add-on	—	—
SCR	731	673

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.

SCR Movement in €'m

Item	2025	
	Amount €'m	
Opening balance		673
Changes due to:		
Scheduled management actions	(1)	
Dividend Payment	(1)	
Model or process updates	9	
Methodology		
Other modelling updates	1	
Assumption updates	8	
Business & capital market movements	50	
Closing balance		731

The SCR increased by €58m from €673m in 2024 to €731m in 2025. The key drivers of this change were the following:

- Model or process updates increased the SCR by €9m. For 2025, the increase was mainly due to demographic and expense assumption changes increasing the SCR by €8m.
- Business & Capital Market Movements reflect the impacts due to organic changes in relation to new business, actual experience and market movements (e.g., interest rates, foreign exchange rates). For 2025, the increase was mainly due to:
 - Renewals in the UK Group Life business and new business sales across branches increased the Life Underwriting risk.
 - Renewals and new business in the UK A&H business increased the Health Underwriting Risk.

MCR

MCR	31-Dec-25	31-Dec-24
	€'m	€'m
	329	303

The upper MCR cap (45%) bites for MetLife Europe and this has been the case since YE 2018. The movement in the MCR is being driven by the movement in the SCR and the resulting impact on the MCR Cap.

Capital add-ons

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

E.2.4 Loss absorbing capacity of deferred tax

The Loss Absorbing Capacity of Deferred Tax (LACDT) is as follows:

	31-Dec-25	31-Dec-24	Movement
	€'m	€'m	€'m
France	37	34	3
Cyprus	1	—	1
Romania	7	6	1
Portugal	6	4	2
Spain	—	5	(5)
Italy	20	15	5
Total LACDT	71	64	7

LACDT is calculated in line with EIOPA guidelines and is capped at the lower of:

- i. SCR multiplied by the local statutory tax rate.
- ii. Drop in DTL between base and stress case cash flows calculated using the Present Value of Future Profits (PVFP)
- iii. Balance Sheet DTL (if DTA, then no LACDT).

The LACDT for France and Romania is based on SCR at the local tax rate while the LACDT for remaining ME Branches is capped by the net DTL recognised on the Balance Sheet in based scenario.

The underlying assumptions used for calculating the PVFP are follows:

- There is no allowance for new business sales.
- Business is calculated on a 'going concern' basis.
- Euro asset returns are projected and Euro cashflows discounted using the risk-free curve and volatility adjustment.
- Non-Euro asset returns are projected and Non-Euro cashflows discounted using the risk-free rate.
- All demographic and economic assumptions are the current best estimate assumptions (in line with the BEL).

E.2.5 Treatment of participating business

The Undertaking does not have any lines of business with material discretionary benefits.

The EIB business does provide "participating" benefits linked to investment returns where such returns exceed the level guaranteed at issue, however these excess benefits are not subject to material discretion. The EIB portfolios are not treated as RFFs on the grounds that the technical provisions cover the entire expected future cost of benefits. Full account of changes in credited rates for EIB business is allowed for in the market stresses.

E.2.6 Risk mitigation techniques and future management actions

Treatment of risk mitigation techniques

Risk mitigation techniques for the Undertaking relate principally to reinsurance evaluated within the technical provisions, in the SCR stresses, and in particular also in the Counterparty Default Risk module of the SCR, with due allowance for counterparty credit rating and loss-given-default.

Treatment of future management actions

The Undertaking has approved the following future management actions:

- An expense reduction of 20% is allowed for under the 40% Mass Lapse SCR stress. The rationale being that were 40% of policyholders to lapse, the Undertaking would be able to reduce expenses by 20%. This action affects the SCR.
- The management of future overhead expenses on the UK unit-linked business in the Head office, following the Undertaking's decision to close this to new business in 2017. This action recognises that the overhead costs do not run off as quickly as the policies run off, and identifies how management expects to reduce such overheads over the lifetime of the portfolio. This action affects the technical provisions with second order consequences for the SCR.

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.

Based on the results of the year end valuation and of the 2025 ORSA there is no expectation of non-compliance with the MCR or SCR over the planning horizon.

E.6 Any other information

All information has been disclosed in the preceding sections.

Glossary of terms

Undertaking	MetLife Europe 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
AC	Audit Committee
ALM	Asset Liability Management
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)
CEO	Chief Executive Officer
CF	Controlled Function
CFO	Chief Finance Officer
CRO	Chief Risk Officer
CZK	Czech Koruna
DAC	Deferred Acquisition Costs
d.a.c.	Designated Activity Company
DORA	Digital Operational Resilience Act
DTA	Deferred Tax Asset
DTL	Deferred Tax Liability
EEA	European Economic Area
EIB	Excess Interest Benefit
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
ESG	Environment, Social and Governance
EU	European Union
EUC	End User Computing
FOS	Freedom of Service
FRS	Financial Reporting Standard
FTC	Foreign Tax Credits
GAAP	Generally Accepted Accounting Principles
GBP	Pound Sterling
HR	Human Resources
HRG	Homogeneous Risk Group
IA	Internal Audit
IAF	Individual Accountability Framework
IC	Investment Committee
IFRS	International Financial Reporting Standards
IIA	Institute of Internal Auditors
LACDT	Loss Absorbing Capacity of Deferred Tax

MA	Modelled Adjustments
MAP	Matching Adjustment Portfolio
MCR	Minimum Capital Requirement
MESL	MetLife Europe Services Limited
MRB	MetLife Reinsurance Company of Bermuda Limited
NAV	Net Asset Value
NFRA	Non-Financial Risk Assessment
Nom Co	Nomination Committee
ORSA	Own Risk and Solvency Assessment
PCF	Pre-Approval Controlled Function
PMC	Product Management Committee
PVFP	Present Value of future profits
QRT	Quantitative Reporting Template
RACC	Risk, Audit and Compliance Committee
RFF	Ring Fenced Fund
SCR	Solvency Capital Requirement
SEAR	Senior Executive Accountability Regime
SFCR	Solvency and Financial Condition Report
SLT	Similar to Life Techniques
UA	Un-modelled Adjustments
UCA	Unearned Commission Asset
UK	United Kingdom
USA	United States of America
USPs	Undertaking Specific Parameters

METLIFE EUROPE D.A.C. PUBLIC DISCLOSURE

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Year: 2025

Currency: Euro

MetLife Europe d.a.c.

S.02.01 Balance Sheet

Solvency II value

Assets		
Goodwill	R0010	
Deferred acquisition costs	R0020	
Intangible assets	R0030	0
Deferred tax assets	R0040	15,763,001
Pension benefit surplus	R0050	
Property, plant & equipment held for own use	R0060	55,381,111
contracts)	R0070	1,809,388,875
Property (other than for own use)	R0080	
Holdings in related undertakings, including participations	R0090	35,754,481
<i>Equities</i>	<i>R0100</i>	<i>33,543</i>
Equities - listed	R0110	0
Equities - unlisted	R0120	33,543
<i>Bonds</i>	<i>R0130</i>	<i>1,726,089,807</i>
Government Bonds	R0140	975,329,059
Corporate Bonds	R0150	750,760,748
Structured notes	R0160	
Collateralised securities	R0170	
Collective Investments Undertakings	R0180	42,325,011
Derivatives	R0190	-26
Deposits other than cash equivalents	R0200	5,186,059
Other investments	R0210	1
Assets held for index-linked and unit-linked contracts	R0220	1,793,281,562
Loans and mortgages	R0230	72,913,190
Loans on policies	R0240	
Loans and mortgages to individuals	R0250	10,362,405
Other loans and mortgages	R0260	62,550,785
Reinsurance recoverables from:	R0270	341,049,414
Non-life and health similar to non-life	R0280	4,142,698
Non-life excluding health	R0290	
Health similar to non-life	R0300	4,142,698
linked	R0310	210,973,241
Health similar to life	R0320	79,539,914
Life excluding health and index-linked and unit-linked	R0330	131,433,327
Life index-linked and unit-linked	R0340	125,933,475
Deposits to cedants	R0350	
Insurance and intermediaries receivables	R0360	141,944,468
Reinsurance receivables	R0370	9,547,136
Receivables (trade, not insurance)	R0380	45,694,794
Own shares (held directly)	R0390	
paid in	R0400	
Cash and cash equivalents	R0410	126,085,060
Any other assets, not elsewhere shown	R0420	
Total assets	R0500	4,411,048,611

Liabilities

Technical provisions - non-life	R0510	5,365,584
Technical provisions - non-life (excluding health)	R0520	
Technical provisions calculated as a whole	R0530	
Best Estimate	R0540	
Risk margin	R0550	
Technical provisions - health (similar to non-life)	R0560	5,365,584
Technical provisions calculated as a whole	R0570	
Best Estimate	R0580	-6,923,111
Risk margin	R0590	12,288,695
Technical provisions - life (excluding index-linked and unit-linked)	R0600	1,165,517,963
Technical provisions - health (similar to life)	R0610	-64,926,171
Technical provisions calculated as a whole	R0620	
Best estimate	R0630	-112,690,843
Risk margin	R0640	47,764,672
linked)	R0650	1,230,444,134
Technical provisions calculated as a whole	R0660	
Best Estimate	R0670	1,098,925,512
Risk margin	R0680	131,518,622
Technical provisions - index-linked and unit-linked	R0690	1,490,701,025
Technical provisions calculated as a whole	R0700	
Best Estimate	R0710	1,447,562,802
Risk margin	R0720	43,138,222
Other technical provisions	R0730	
Contingent liabilities	R0740	
Provisions other than technical provisions	R0750	11,011,061
Pension benefit obligations	R0760	
Deposits from reinsurers	R0770	127,976,415
Deferred tax liabilities	R0780	120,029,143
Derivatives	R0790	2,060,945
Debts owed to credit institutions	R0800	6,962,192
Financial liabilities other than debts owed to credit institutions	R0810	15,729,183
Insurance & intermediaries payables	R0820	200,140,657
Reinsurance payables	R0830	65,387,944
Payables (trade, not insurance)	R0840	94,485,583
Subordinated liabilities	R0850	
Subordinated liabilities not in Basic Own Funds	R0860	
Subordinated liabilities in Basic Own Funds	R0870	
Any other liabilities, not elsewhere shown	R0880	
Total liabilities	R0900	3,305,367,694
Excess of assets over liabilities	R1000	1,105,680,916

S.04.05 Premiums, claims and expenses by country

Non-life insurance and reinsurance obligations

		Top 5 countries: non-life						
		Home country						
		C0010 Ireland (IE)	C0020 Slovakia (SK)	C0020 Cyprus (CY)	C0020 Czech Republic (CZ)	C0020 Bulgaria (BG)	C0020 Italy (IT)	
Premiums written (gross)								
Gross Written Premium (direct)	R0020		38,914,672	24,178,932	13,278,908	4,059,698	4,274,889	
Gross Written Premium (proportional reinsurance)	R0001							
Gross Written Premium (non-proportional reinsurance)	R0022							
Premiums earned (gross)								
Gross Earned Premium (direct)	R0020		38,914,672	23,060,159	12,918,505	3,996,618	4,237,853	
Gross Earned Premium (proportional reinsurance)	R0001							
Gross Earned Premium (non-proportional reinsurance)	R0022							
Claims incurred (gross)								
Claims incurred (direct)	R0040		9,270,764	9,185,468	22,643,071	911,758	1,207,123	
Claims incurred (proportional reinsurance)	R0041							
Claims incurred (non-proportional reinsurance)	R0042							
Expenses incurred (gross)								
Gross Expenses Incurred (direct)	R0050		12,495,892	3,831,529	6,672,800	22,599	1,481,897	
Gross Expenses Incurred (proportional reinsurance)	R0051							
Gross Expenses Incurred (non-proportional reinsurance)	R0052							

Life insurance and reinsurance obligations

		Top 5 countries: life and health SLT					
		Home country					
		C0030 Ireland (IE)	C0040 United Kingdom (After Brexit)	C0040 Italy (IT)	C0040 France (FR)	C0040 Romania (RO)	C0040 Hungary (HU)
R0100							
Gross Written Premium	R1020		517,794,731	253,220,843	215,930,931	163,555,941	137,829,733
Gross Earned Premium	R1030		529,436,913	245,364,799	215,930,931	141,399,890	137,650,718
Claims Incurred	R1040	14,511,650	355,260,474	61,845,358	84,050,553	57,161,005	69,794,372
Gross Expenses Incurred	R1050	(47,064,512)	119,906,935	139,342,706	89,690,801	73,718,028	27,789,392

S.05.01 Premiums, claims and expenses by line of business

	Line of Business for: no-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)											Line of Business for: accepted non-proportional reinsurance				Total	
	Medical expense insurance CO010	Income protection insurance CO010	Workers' compensation insurance CO010	Motor vehicle liability insurance CO020	Other motor insurance CO020	Marine, aviation and transport insurance CO020	Fire and other property insurance CO030	Personal liability insurance CO030	Credit and suretyship insurance CO030	Legal expense insurance CO100	Assistance CO110	Place/office financial loss CO120	Health CO130	Casualty CO140	Marine, aviation, transport CO150		Property CO160
Direct business	80,200	29,711,639	1,415,401	116,029													82,733,100
Reinsurance																	83,756,330
Total	80,200	29,711,639	1,415,401	116,029													166,489,430
Direct business	80,200	29,711,639	1,415,401	116,029													82,733,100
Reinsurance																	83,756,330
Total	80,200	29,711,639	1,415,401	116,029													166,489,430

	Line of Business for: life insurance obligations					Life reinsurance obligations			Total
	Health insurance CO210	Insurance with profit participation CO220	Index-linked and unit-linked insurance CO230	Other life insurance CO240	Residuals ceded from non-life insurance contracts and relating to health insurance obligations CO250	Residuals ceded from non-life insurance contracts and relating to health insurance obligations other than health insurance obligations CO260	Health reinsurance CO270	Life reinsurance CO280	
Direct business	81,500	289,111,131	88,172,401	258,127,891	811,579,391		289,491	13,493,891	1,479,774,791
Reinsurance									1,211,774,521
Total	81,500	289,111,131	88,172,401	258,127,891	811,579,391		289,491	13,493,891	2,691,549,312
Direct business	81,500	289,111,131	88,172,401	258,127,891	811,579,391		289,491	13,493,891	1,479,774,791
Reinsurance									1,211,774,521
Total	81,500	289,111,131	88,172,401	258,127,891	811,579,391		289,491	13,493,891	2,691,549,312

S.12.01 Life and Health SLT Technical Provisions

	R0010	Index-linked and unit-linked insurance				Other life insurance				Analyses stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations	C0100	Total (Life other than health insurance, including Unit-Linked)	Health insurance (direct business)				Analyses stemming from non-life insurance contracts and relating to health insurance obligations	Health insurance (reinsurance accepted)	Total (Health similar to life insurance)			
		Insurance with profit participation		Insurance without profit participation		Contracts without options and guarantees		Contracts with options or guarantees					C0150	C0160	Health insurance (direct business)					C0190	C0200	C0210
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0170						C0180							
Technical provisions calculated as a whole	R0010										0							0				
Plus reinsurance from reinsurers (CPI and FRI) after the adjustment for reported losses due to counterparty default associated to TP as a whole	R0020										0							0				
Technical provisions calculated as a sum of BE and RM																						
Best Estimate	R0030	362,420,545	634,413,006	813,149,798	90,518,510	95,286,246	681,212	3,546,488,315		681,212	2,946,488,315	(240,262,210)	125,886,983	1,454,391			(112,690,844)					
Plus reinsurance from reinsurers (CPI and FRI) after the adjustment for reported losses due to counterparty default	R0040	1,740,124		125,554,453	(2,213,120)	126,969,473					29,736,882	1,287,210	76,112,099				79,920,914					
Best estimate, reinsurance from reinsurers (CPI and FRI) as a sum	R0050	966,633,969	634,413,006	938,704,251	88,305,390	222,255,719	681,212	3,576,225,197		681,212	3,286,321,512	(241,509,433)	202,001,182	1,454,391			(32,769,930)					
Risk Margin	R0100	26,029,102	43,138,222	104,839,520			1	174,858,845		1	174,858,845	47,764,021		1			47,764,673					
Sum of the transition on Technical Provisions	R0150																					
Technical provisions - BE	R0200	989,088,644	1,499,701,025	2,047,543,771	246,610,780	444,511,438	681,213	3,751,454,142		681,213	3,721,145,159	(66,745,412)	202,001,183	1,454,392			(64,926,157)					

S.17.01 Non - Life Technical Provisions

		Direct business and accepted proportional reinsurance											Accepted non-proportional reinsurance:				Total 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	Miscellaneous financial loss	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance		Non-proportional property reinsurance
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160		C0170
Technical provisions calculated as a whole	R0010																	
Total Recoverables from reinsurance (SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to IP calculated as a whole)	R0050																	
Technical Provisions calculated as a sum of BE and RM																		
Best estimate																		
Premium provisions																		
Gross	R0060	3,516,460	(30,027,909)	323,333														(26,188,116)
for expected losses due to counterparty default	R0140	404,268	(25,965)	262,979														641,282
Net Best Estimate of Premium Provisions	R0150	3,112,191	(30,001,944)	60,355														(26,829,398)
Claims provisions																		
Gross	R0060	4,264,056	14,604,258	396,690														19,265,005
for expected losses due to counterparty default	R0240	1,303,914	1,894,432	253,079														3,501,416
Net Best Estimate of Claims Provisions	R0250	2,910,143	12,709,826	143,610														15,763,589
Total Best estimate - gross	R0260	7,780,516	(15,423,651)	720,024														(6,923,111)
Total Best estimate - net	R0270	6,022,334	(17,292,118)	203,975														(11,065,809)
Risk margin	R0280	2,430,997	9,945,151	12,548														12,288,695
Technical provisions - total	R0320	8,453,331	(7,296,967)	216,523														5,365,584
for expected losses due to counterparty default - total	R0330	1,758,182	1,868,467	516,049														4,142,698
total	R0340	8,453,331	(7,446,967)	216,523														1,222,886

S.19.01 Non-Life Insurance Claims Information

		Development year											In Current year	Sum of years (cumulative)		
		0	1	2	3	4	5	6	7	8	9	10 & +				
Gross Claims Paid (non-cumulative)																
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110				
Prior	R0100												13,173			
2016	R0160	16,232,880	7,952,436	1,851,871	628,265	302,981	19,381	34,560	1,178	2,228	0					
2017	R0170	16,529,107	9,277,798	2,275,596	640,305	250,296	25,936	9,273	4,160	3,256						
2018	R0180	17,915,884	12,031,000	3,129,596	775,890	290,041	65,314	10,285	9,701							
2019	R0190	22,378,351	12,674,597	2,512,266	1,569,384	403,327	37,347	26,146								
2020	R0200	20,101,554	9,345,915	2,580,567	783,854	433,643	54,148									
2021	R0210	20,900,678	9,850,706	3,575,955	834,058	280,009										
2022	R0220	24,744,867	10,185,706	3,364,875	863,639											
2023	R0230	27,611,292	10,653,377	2,566,215												
2024	R0240															
2025	R0250															
	Total													C0170	C0180	
														13,173	13,173	
														0	27,025,797	
														3,256	29,015,715	
														9,701	34,227,711	
														26,146	36,601,418	
														54,148	33,299,682	
														280,009	35,441,407	
														863,639	39,159,087	
														2,566,215	40,830,886	
														9,883,896	39,769,895	
														31,223,639	31,223,639	
														44,723,923	349,708,601	

		Development year											Year end (discounted data)			
		0	1	2	3	4	5	6	7	8	9	10 & +				
Gross undiscounted Best Estimate Claims Provisions																
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300				
Prior	R0100												98,470			
2016	R0160	5,969,726	1,668,548	1,094,250	554,808	408,845	126,990	323,660	358,759	323,226	304,654					
2017	R0170	7,422,744	3,211,708	931,038	421,357	441,719	74,845	171,859	132,734	338,752						
2018	R0180	9,580,290	3,098,010	1,149,296	430,855	378,295	155,946	63,366	58,961							
2019	R0190	10,366,307	3,640,495	984,296	717,611	249,618	54,954	54,856								
2020	R0200	10,779,709	3,079,380	1,229,446	445,746	159,660	83,128									
2021	R0210	12,421,045	5,180,489	2,136,433	1,340,268	1,100,612										
2022	R0220	14,059,242	3,260,783	845,182	439,367											
2023	R0230	14,305,512	2,798,745	1,236,714												
2024	R0240	13,532,640	3,411,013													
2025	R0250	12,135,481														
	Total													C0360		
														98,470		
														304,654		
														338,752		
														58,961		
														54,856		
														83,128		
														439,367		
														1,236,714		
														3,411,013		
														12,135,481		
														19,265,008		

S.22.01 Impact of long term guarantees measures and transitionals

		Amount with Long Term Guarantee measures and transitionals	Impact of transitional on technical provisions	Impact of transitional on interest rate	Impact of volatility adjustment set to zero	Impact of matching adjustment set to zero
		C0010	C0030	C0050	C0070	C0090
Technical provisions	R0010	2,661,584,572	0		7,247,480	
Basic own funds	R0020	1,105,680,916	0		-7,579,533	
Eligible own funds to meet Solvency Capital Requirement	R0050	1,105,680,916	0		-7,579,533	
Solvency Capital Requirement	R0090	730,685,080	0		305,488	
Eligible own funds to meet Minimum Capital Requirement	R0100	1,089,917,915	0		-7,579,533	
Minimum Capital Requirement	R0110	328,808,286			137,469	

S.23.01 Own Funds

		Total C0010	Tier 1 - unrestricted C0020	Tier 1 - restricted C0030	Tier 2 C0040	Tier 3 C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35						
Ordinary share capital (gross of own shares)	R0010	4,379,124	4,379,124			
Share premium account related to ordinary share capital	R0030					
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040					
Subordinated mutual member accounts	R0050					
Surplus funds	R0070					
Preference shares	R0090					
Share premium account related to preference shares	R0110					
Reconciliation reserve	R0130	1,085,538,791	1,085,538,791			
Subordinated liabilities	R0140					
An amount equal to the value of net deferred tax assets	R0160	15,763,001				15,763,001
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180					
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds						
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220					
Deductions						
Deductions for participations in financial and credit institutions	R0230					
Total basic own funds after deductions	R0290	1,105,680,916	1,089,917,915			15,763,001
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300					
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310					
Unpaid and uncalled preference shares callable on demand	R0320					
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330					
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340					
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350					
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360					
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370					
Other ancillary own funds	R0390					
Total ancillary own funds	R0400					
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	1,105,680,916	1,089,917,915			15,763,001
Total available own funds to meet the MCR	R0510	1,089,917,915	1,089,917,915			
Total eligible own funds to meet the SCR	R0540	1,105,680,916	1,089,917,915			15,763,001
Total eligible own funds to meet the MCR	R0550	1,089,917,915	1,089,917,915			
SCR	R0580	730,685,080				
MCR	R0600	328,808,286				
Ratio of Eligible own funds to SCR	R0620	151.32%				
Ratio of Eligible own funds to MCR	R0640	331.48%				
Reconciliation reserve						
Excess of assets over liabilities	R0700	1,105,680,916				
Own shares (held directly and indirectly)	R0710					
Foreseeable dividends, distributions and charges	R0720					
Other basic own fund items	R0730	20,142,125				
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring-fenced funds	R0740					
Reconciliation reserve	R0760	1,085,538,791				
Expected profits						
Expected profits included in future premiums (EPIFP) - Life Business	R0770	1,143,593,933				
Expected profits included in future premiums (EPIFP) - Non-life business	R0780	36,790,463				
Total Expected profits included in future premiums (EPIFP)	R0790	1,180,384,396				

S.25.01 Solvency Capital Requirement - for undertakings on Standard Formula

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0120
Market risk	R0010	172,480,852		
Counterparty default risk	R0020	57,611,716		
Life underwriting risk	R0030	562,666,525		
Health underwriting risk	R0040	185,064,040		
Non-life underwriting risk	R0050	93,010		
Diversification	R0060	-251,981,427		
Intangible asset risk	R0070			
Basic Solvency Capital Requirement	R0100	725,934,715		

Calculation of Solvency Capital Requirement

		C0100
Operational risk	R0130	76,304,564
Loss-absorbing capacity of technical provisions	R0140	
Loss-absorbing capacity of deferred taxes	R0150	-71,554,199
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	
Solvency Capital Requirement excluding capital add-on	R0200	730,685,080
Capital add-ons already set	R0210	
of which, capital add-ons already set - Article 37 (1) Type a	R0211	
of which, capital add-ons already set - Article 37 (1) Type b	R0212	
of which, capital add-ons already set - Article 37 (1) Type c	R0213	
of which, capital add-ons already set - Article 37 (1) Type d	R0214	
Solvency capital requirement	R0220	730,685,080
Other information on SCR		
Capital requirement for duration-based equity risk sub-module	R0400	
Total amount of Notional Solvency Capital Requirements for remaining part	R0410	
Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420	
Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	R0430	
Diversification effects due to RFF nSCR aggregation for article 304	R0440	

Approach to tax rate

		Yes / No
Approach based on average tax rate	R0590	2 - No

Calculation of loss absorbing capacity of deferred taxes

		LAC DT
		C0130
LAC DT	R0640	-71,554,199
LAC DT justified by reversion of deferred tax liabilities	R0650	-71,554,199
LAC DT justified by reference to probable future taxable economic profit	R0660	
LAC DT justified by carry back, current year	R0670	
LAC DT justified by carry back, future years	R0680	
Maximum LAC DT	R0690	-129,208,085

S.28.02 Minimum Capital Requirement - Both life and non-life insurance activity

		Non-life activities	Life activities
		C0010	C0020
Linear formula component for non-life insurance and reinsurance obligations	R0010	6,205,497	

Linear formula component for non-life insurance and reinsurance obligations

MCR calculation Non Life		Non-life activities		Life activities	
		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months	Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
		C0030	C0040	C0050	C0060
Medical expense insurance and proportional reinsurance	R0020	6,022,334		30,459,235	
Income protection insurance and proportional reinsurance	R0030			52,138,891	
Workers' compensation insurance and proportional reinsurance	R0040	203,975		116,049	
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			193,090	
Miscellaneous financial loss insurance and proportional reinsurance	R0130			99,309	
Non-proportional health reinsurance	R0140				
Non-proportional casualty reinsurance	R0150				
Non-proportional marine, aviation and transport reinsurance	R0160				
Non-proportional property reinsurance	R0170				

Linear formula component for life insurance and reinsurance obligations

MCR calculation Life		Non-life activities		Life activities	
		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk	Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
		C0090	C0100	C0110	C0120
Obligations with profit participation - guaranteed benefits	R0210			940,842,201	
Obligations with profit participation - future discretionary benefits	R0220			19,789,763	
Index-linked and unit-linked insurance obligations	R0230			1,321,629,066	
Other life (re)insurance and health (re)insurance obligations	R0240			0	
Total capital at risk for all life (re)insurance obligations	R0250				648,042,168,144

		Non-life activities	Life activities
		C0070	C0080
Linear formula component for life insurance and reinsurance obligations	R0200		496,663,015

Overall MCR calculation

		C0130
Linear MCR	R0300	502,868,512
SCR	R0310	730,685,080
MCR cap	R0320	328,808,286
MCR floor	R0330	182,671,270
Combined MCR	R0340	328,808,286
Absolute floor of the MCR	R0350	6,700,000
Minimum Capital Requirement	R0400	328,808,286

Notional non-life and life MCR calculation

		Non-life activities	Life activities
		C0140	C0150
Notional linear MCR	R0500	6,205,497	496,663,015
Notional SCR excluding add-on (annual or latest calculation)	R0510	9,016,798	721,668,282
Notional MCR cap	R0520	4,057,559	324,750,727
Notional MCR floor	R0530	2,254,200	180,417,070
Notional Combined MCR	R0540	4,057,559	324,750,727
Absolute floor of the notional MCR	R0550	2,700,000	4,000,000
Notional MCR	R0560	4,057,559	324,750,727