



# Maiden Life Försäkrings AB

Solvency and Financial Condition Report (SFCR)

For the twelve month period ending December 31, 2021

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#### Forward Looking Statements

Certain statements in this report are forward looking statements. These forward looking statements can be identified by the use of forward looking terminology including the terms "believes", "expects", "estimates", "anticipates", "intends", "may", "will" or "should" or in each case, their negative, or other variations or comparable terminology. These forward looking statements reflect the Company's current expectations concerning future events. They involve various risks, uncertainties and other factors which may cause the actual results, performance or achievements of the Company, third parties or the industry to be materially different from any future results, performance or achievements expressed or implied by such forward looking statements. Such risks, uncertainties and other factors include, amongst other things, general economic and business conditions, industry trends, competition, changes in regulation, currency fluctuations, changes in business strategy or development and political and economic uncertainty. There can be no assurance that the results and events contemplated by these forward looking statements will in fact occur.

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## Introduction

Maiden Life Försäkrings, AB. (“Maiden LF” or the “Company”) is licensed to underwrite direct and indirect insurance for Class 1a – Life Insurance and Class 1b – Supplementary Insurance to Class 1a. Maiden LF is domiciled in Sweden however coverage is provided throughout Europe under the “Provision of Freedom of Services” where passports have been granted.

Maiden LF is a subsidiary of Maiden Holdings, Ltd. (“Maiden” or the “Group”). Maiden is a Bermuda headquartered holding company which is traded on the NASDAQ (MHLN). Effective March 16, 2020, Maiden Reinsurance, Ltd. completed its re-domestication to the State of Vermont in the U.S. The Vermont Department of Financial Regulation is the Group supervisor.

As a result of Brexit, the Company could no longer rely on a passported permission to underwrite in the UK. From 31 December 2020, the Company was accepted into the UK’s Temporary Permissions Regime (“TPR”) with a deemed Part 4A permission which allows EEA firms who were formerly using a Freedom of Services (FOS) passport to operate for a limited period while they seek authorisation from the Prudential Regulatory Authority (“PRA”). The deemed Part 4A permission means that the Company continues to be an authorised person for the purpose of UK law and that the Company can continue to underwrite in the UK despite Brexit. The Company has applied for regulatory approval of its UK branch from the PRA and FCA.

This Solvency and Financial Condition Report (“SFCR”) has been prepared to assist stakeholders to understand the capital position of the Company under the Solvency II framework.

The Company has ensured that it is Solvency II (“SII”) compliant.

There have been no material changes during 2021 to the reporting requirements of the Company and the Company continues to file QRTs quarterly, with an additional QRT reported annually. Within the QRTs the Company considers its solvency under SII standards and valuation methodologies. There is further information in the SFCR on how the valuation for solvency purposes varies from the valuation for accounting purposes. The Company continues to have adequate capital under the valuation for solvency purposes basis.

## System of Governance

During 2021 there has been an additional Board member added who is now responsible for the oversight of the Risk Management Function.

## Risk Profile

The risk profile of the Company remains consistent with prior years, with no significant changes during the reporting period. The highest rated risks that the Company is exposed to are:

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- **Data Risk:** The risk that data received from Third Party Administrators (“TPAs”) relating to policies or claims is of poor quality. Obligations for data provision are included in contracts with TPAs and data received is monitored regularly for quality and accuracy.
- **Solvency Risk:** The risk that as the business grows, the solvency margin cannot be maintained either through a lack of capital or uncontrolled growth. Capital forecasts are undertaken annually through the completion of the ORSA or when the risk profile of the Company materially changes.
- **UK Underwriting Capabilities:** Continuity of the Company to continue to service insurance policyholders in the UK if its deemed Part 4a permission allowed under the UK’s Temporary Permission Regime were to end.
- **Regulatory Risk (Compliance):** The risk that the Company fails to comply with regulation, such as Solvency II or EIOPA’s Guidelines on Outsourcing to Cloud Service Providers. The Company has a suitable governance structure in place to ensure compliance and follows regulatory developments for changes to regulation.
- **Regulatory Risk (Insurance Products):** The risk that regulatory changes in a country in which the Company operates has material implications for existing or planned products. The Company closely follows regulatory developments and assesses the potential impact on the products underwritten by the Company.
- **General Data Protection Regulation (“GDPR”) Risk:** The risk that GDPR regulations are breached. GDPR requirements are monitored at a program level, are included in product launch requirements and are regularly monitored to ensure continued compliance.
- **Business Development Risk:** The risk that the Company cannot generate profitable new business, or the cancellation of significant existing business. New business opportunities are being actively pursued and all new business undergoes pricing and underwriting review prior to launch, and regular monitoring of profitability once live. Business strategy is to diversify sources of income to reduce reliance on specific clients, product lines or geographies.

During 2021, there were no material changes to the risks that the Company is exposed to. One high rated risk, the increased reliance on a particular outsourced provider for the provision of cloud based Software as a Service for insurance administration services, was downgraded from high to tolerable. The reduced risk is primarily due to a significant decrease in the number of insureds being administered by the provider effective February 1<sup>st</sup>, 2022.

The Company continued to monitor the impact of the coronavirus pandemic during 2021 and the resulting impact to the Company. As an underwriter of life and disability risks, typically within the working population and therefore under the age of 60, there has not been a material increase in the number of claims experienced during 2020 or 2021. The greater risk to the Company may however be the indirect impact of reduced access to routine healthcare during the pandemic, and beyond, resulting in a deterioration in the general health of its

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portfolio. The Company has taken action where appropriate, such as changes to customer terms and conditions and price changes, and the assessment is that any anticipated delayed impact can be tolerated. It is an evolving situation that remains an important focus of the Company.

An assessment has been undertaken as to the impact to the Company of the crisis in Ukraine. Primarily, the underwriting of the Company will not be impacted directly as the Company does not underwrite in either Ukraine or Russia, and the types of risks underwritten (life and supplementary life risks) should also not be directly impacted. The events do bring further uncertainty to the economic environment and the Company would be impacted by inflation, which is further pressurized by these events, and turbulence in the markets potentially resulting in investments being downgraded. No action has been considered necessary at this point in time; however, it is a new and unpredictable situation and therefore the Company will continue to assess the implications as developments occur.

### **Capital Management**

The Company monitors capital adequacy as part of its continual capital management activities and currently exceeds the Company's risk based benchmark for meeting capital adequacy. In addition, the Company has completed an Own Risk Solvency Assessment ("ORSA") which demonstrates that the Company continues to have adequate capital cover and options to reduce risk where necessary. The greatest risk exposure is within underwriting and market risk. There is further information in the SFCR on how the Company manages these risks, and how the risks are mitigated against.

Effective 1 October 2021, the Company entered into a whole account Quota Share agreement with Maiden Reinsurance Ltd., a sister company domiciled in the State of Vermont, United States. The agreement, structured on the basis of a Funds Withheld arrangement, was effected to provide ongoing capital support to the Company as it develops its business operations.

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## A. Business and Performance

Note: Numbers in EUR 000s.

### A.1. Business

#### A.1.1 Name and legal form

The Company is Maiden Life Försäkrings AB, incorporated in Sweden, corporation number 516406-0468. The legal form of the Company is a Swedish aktiebolag (AB).

#### A.1.2 Name and contact details of the supervisory authority, and name and contact details of the group supervisor

Finansinspektionen is the supervisory authority of the Company.

Finansinspektionen  
Box 7821  
103 97 Stockholm

Tel: + 46 8 408 980 00  
Fax: + 46 8 24 13 35

Effective March 16, 2020, the Vermont Department of Financial Regulation is the Group supervisor.

David Provost  
State of Vermont - Department of Financial Regulation  
89 Main Street  
Montpelier  
VT 05620-0501

Tel: +1- 802-828-3304

#### A.1.3 Name and contact details of the external auditor

Effective February 2<sup>nd</sup>, 2021, the external auditor changed to KPMG AB.

KPMG AB  
Box 382  
101 27 Stockholm

Tel: +46 8 723 91 00

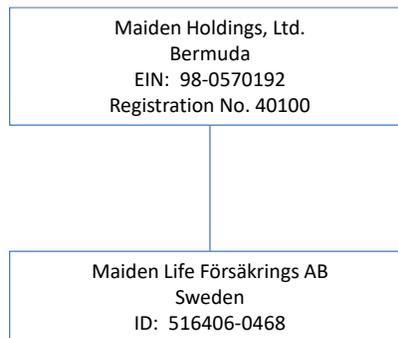
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#### A.1.4 Description of the holders of qualifying holdings

All shares issued and outstanding for the Company are owned by Maiden Holdings, Ltd., a company incorporated in Bermuda.

#### A.1.5 Group structure chart

The position of the Company within the Group as at 31 December 2021 is as shown in the diagram below:



*Diagram 1: Company position within Group Structure*

#### A.1.6 Material lines of business by segment and geographical region

Products underwritten are mainly credit related insurance with a life benefit, although the Company also writes life insurance, stand alone income protection, personal accident, stand alone accidental death policies and life and medical disability products. All products include a life and/or accidental death cover. In addition, products may also include supplementary life benefits such as accident, sickness, permanent total disability, hospitalization and critical illness. The material lines of business are considered to be life and supplementary life.

The Company was on risk through 2021 in Denmark, Finland, Germany, Ireland, Italy, Norway, Sweden and the United Kingdom. The material geographical regions are considered to be Denmark, Ireland, Sweden, UK and Rest of Europe.

#### A.1.7 Significant events with a material impact

There are no significant events with a material impact to report.

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## A.2. Underwriting performance

Underwriting performance, excluding operating expenses, by line of business:

€'000	2021		
	Life	Supplementary Life	Total
Premiums written	2,683	7,877	10,560
Premiums earned	1,823	6,163	7,986
Commission Expense	(842)	(3,167)	(4,009)
Claims incurred	(266)	(1,600)	(1,866)
<b>Underwriting Income</b>	<b>715</b>	<b>1,396</b>	<b>2,111</b>

	2020		
	Life	Supplementary Life	Total
Premiums written	2,759	8,150	10,909
Premiums earned	1,758	6,507	8,265
Commission Expense	(725)	(3,339)	(4,064)
Claims incurred	(336)	(2,106)	(2,442)
<b>Underwriting Income</b>	<b>697</b>	<b>1,062</b>	<b>1,759</b>

Underwriting performance , excluding operating expenses, by geographical area:

€'000	2021					Total
	Denmark	Ireland	Sweden	UK	Rest of Europe	
Premiums written	1,614	2,442	4,028	2,236	239	10,560
Premiums earned	1,336	2,021	3,266	1,281	82	7,986
Commission Expense	(391)	(819)	(2,246)	(519)	(33)	(4,009)
Claims incurred	(295)	(1,048)	(360)	(73)	(89)	(1,866)
<b>Underwriting Income</b>	<b>650</b>	<b>153</b>	<b>660</b>	<b>689</b>	<b>(40)</b>	<b>2,111</b>

€'000	2020					Total
	Denmark	Ireland	Sweden	UK	Rest of Europe	
Premiums written	1,534	2,304	2,985	2,063	2,023	10,909
Premiums earned	1,534	2,304	2,985	1,331	111	8,265
Commission Expense	(447)	(985)	(2,062)	(556)	(14)	(4,064)
Claims incurred	(707)	(1,155)	(428)	(169)	17	(2,442)
<b>Underwriting Income</b>	<b>380</b>	<b>164</b>	<b>495</b>	<b>606</b>	<b>114</b>	<b>1,759</b>

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### A.3. Investment performance

#### A.3.1 Income and expenses arising by asset class

€'000	31/12/2021	Total Return	Total Return %
<b>Govn Bonds/ Corporate Bonds</b>	7,691	71	0.92%
<b>Cash</b>	4,236	(7)	(0.17%)

Investment return on Government and Corporate bonds is shown net of investment fees of €7.

#### A.3.2 Gains/losses recognized in equity

An unrealized loss on Government and Corporate bonds of €157 was booked to equity in 2021.

#### A.3.3 Information about investments in securitizations

The Company has no investments in securitizations.

### A.4. Performance of other activities

Revenues are from premiums on our insurance policies, ceding commission on reinsured business and income generated from our investment portfolio.

Expenses consist largely of claims costs, commission and operating expenses.

Claim costs have three main components:

- losses paid, which are actual cash payments to insureds, net of recoverables from reinsurers;
- change in In Course of Payment reserves, which represent the best estimate of the likely settlement amount for known claims, less the portion that can be recovered from reinsurers; and
- change in Incurred But Not Reported reserves, which are reserves established for claims that have occurred but have not yet been reported to the Company. The portion recoverable from our reinsurers is deducted from the gross estimated loss.

Commissions are usually calculated as a percentage of premiums and depend on the market and line of business. Commission and other acquisition expenses are reported after: (1) deducting commissions received on ceded reinsurance; (2) deducting the part of commission and other acquisition expenses relating to unearned premiums; and (3) including the amortization of previously deferred commission and other acquisition expenses.

Operating expenses include administration expenses, professional fees and other general operating expenses.

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Expense Type (€'000)	For the 12 Months Ended Dec 31, 2021	For the 12 Months Ended Dec 31, 2020
Net loss and loss adjustment expenses	1,866	2,442
Commission and other acquisition expenses	4,009	4,064
General and administrative expenses	3,130	2,961
<b>Total Expenses</b>	<b>9,005</b>	<b>9,467</b>

#### A.5. Any other information

On 23rd June 2021, Finansinspektionen (FI) published their findings, following their examination of the Company which began in January 2020.

Throughout the process, the Company fully cooperated with FI and worked to rectify any areas that required improvement. FI has confirmed that they are satisfied with the changes made by the Company and that they have no cause to assume the issues will be on-going. The examination by FI was into technical areas of the Insurance Business Act and at no time were any customers affected, or the solvency ratio of the Company.

FI issued the Company a warning and an administrative fine of €560. This amount is included in General and administrative expenses in the table in 2.4.

Effective 1 October 2021, the Company entered into a whole account Quota Share agreement with Maiden Reinsurance Ltd., a sister company domiciled in the State of Vermont, United States. The agreement, structured on the basis of a funds withheld arrangement, was effected to provide ongoing capital support to the Company as it develops its business operations.

## B. System of Governance

### B.1. General information on the system of governance

#### B.1.1 Management structure: roles, responsibilities and segregation of responsibilities

The Company has established a Corporate Governance Framework which ensures that the Company’s Board of Directors (“Board”) is the focal point of the governance system and is ultimately accountable and responsible for the Company’s performance and conduct. To ensure that the Board fully meets its responsibilities and stewardship in an acceptable fashion, the Board has established an appropriate number of functions, each with clear responsibilities and each of which reports to the Board. The system of governance has been established to ensure segregation of duties where appropriate and clear responsibilities for each function.



Note: Correct as of March 28<sup>th</sup>, 2022

#### Board of Directors

The Board is responsible for setting appropriate strategies and policies, for providing effective and prudent oversight of functions regardless of the extent to which functions are outsourced, and for monitoring the financial performance of the Company. The Board meets as warranted, but no less than three times a year. The Managing Director regularly keeps the Board of Directors apprised of significant issues and events.

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The central functions each have a nominated Board member that is responsible for overseeing that function.

<b>Central Function</b>	<b>Board Oversight</b>
Actuarial Function	Ola Hestnes
Compliance Function	Cheryl Brunette
Internal Audit Function	Max Reid (Chairman)
Risk Management Function	Charlotte Boij

Note: Correct as of March 29<sup>th</sup>, 2021

At most Board meetings, there is a central function and operational update, where the Board is informed on the activities within each central function area since the prior Board meeting.

### Central Functions

#### Actuarial Function

The Actuarial Function is responsible for the development of the Technical Guidelines including Technical Calculations and implementing the methodologies agreed for calculating technical insurance reserves and technical insurance provisions on an on-going basis. In addition, the Actuarial Function assists in the preparation of the quarterly and annual assessment of capital requirements and the ORSA. This function formally provides a written report to the Board at least annually, with ad hoc updates where necessary.

#### Compliance Function

The Compliance Function, which is part of the “second line of defence”, promotes and monitors the integrity of the Company by advising on and complying with applicable laws, regulations and administrative provisions, particularly, in respect of the Solvency II directive, industry and professional standards and internal policies. This function formally provides a written report to the Board at least annually, with ad hoc updates where necessary.

#### Internal Audit

The Internal Audit Function examines and evaluates the functioning, effectiveness and efficiency of the internal control system and system of governance and makes recommendations for improvements. This function is an independent function within the Maiden group, reporting directly to the Board at least annually.

#### Risk Management Function

The Risk Management Function is in charge of monitoring the risk management system and the general risk profile of the Company. It provides independent oversight of the Operations’ adherence to the Risk Management Policy. It presents to the Board detailed reporting on risk

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exposures and advice on risk management matters. This function formally provides a written report to the Board at least annually, with ad hoc updates where necessary.

### Operations

The Managing Director is responsible for the continuous management of the Company according to the guidelines and procedures approved by the Board of directors. An operational set up has been developed to allow the management of the Company to be conducted in an efficient manner, with clear responsibilities and deliverables for each functional area.

### UK Branch

The UK branch of the Company has three senior manager functions - Head of Branch (SMF 19), MLRO (SMF 17) and Compliance Oversight (SMF 16) in accordance with the requirements of the UK's Senior Managers and Certificate Regime ("SM&CR") which governs how people working in financial services in the UK are regulated. The Head of Branch is responsible for management of the UK branch and provides regular updates to the Company's Board in respect of the branch.

#### B.1.2 Material changes in system of governance

During 2021 there has been an additional Board member added who is now responsible for the oversight of the Risk Management Function.

The key contact person for the service provider of the Compliance Function changed during the year and underwent a Fit and Proper assessment prior to appointment. No other changes were made to the central functions.

#### B.1.3 Principles of remuneration

The Remuneration Policy has been set with the aim of promoting effective risk management and preventing excessive risk taking.

Only external Non-Executive Directors (not employed within the Maiden group) are remunerated by the Company and each receives a fixed salary, determined annually by the Chairman of the Company. There is no variable compensation for the roles of Non Executive Directors. One Non-Executive Director receives additional compensation for consultancy work on business development.

Other positions within the Company considered to have a degree of influence of the Company's risk level are the Chairman, Managing Director and Directors. These individuals do not receive any remuneration from the Company and are remunerated by a group company.

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#### B.1.4 Performance criteria for entitlement to share options, shares, or variable components of remuneration

No share options, shares or variable remuneration were provided by the Company.

#### B.1.5 Main characteristics of pension schemes for management and central functions

The Company does not have any pension schemes.

#### B.1.6 Material transactions with shareholders, persons who exercise significant control and management

During the year ended December 31, 2021, no dividends were paid from the Company to the Shareholder and there were no material transactions with persons who exercise significant control.

### B.2. Fit and proper requirements

#### B.2.1 Description of the fit and proper requirements of management and key functions

Members of the Board of directors, persons performing central functions, the Managing Director and Head of Branch must have the skills required to manage and supervise the Company. Collectively there must be sufficient knowledge and professional experience in:

- a) Insurance, reinsurance and financial markets: The awareness and understanding of the business and economic environment in which the Company operates.
- b) Strategy and business models of the Company: A detailed understanding of the Company's business strategy and model.
- c) Governance systems: The awareness and understanding of the Company's risks and the capability of managing them and the ability to assess the effectiveness of the Company's arrangements to deliver effective governance, oversight and controls.
- d) Financial and actuarial analysis: The ability to understand and interpret the financial and actuarial information provided by other functions and take it into account in the decision-making process.
- e) Legislation and regulations applicable to the Company: The awareness and understanding of the regulatory framework in which the Company operates.

In addition, the Board, management and central functions must be honest and ethical in their personal and professional behaviour. This includes the disclosure of conflicts of interest.

#### B.2.2 Description of the process for assessing the fit and proper requirements of management and central functions

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Upon nomination to the Board, officer role or central function, a thorough assessment is made of their reputation, experience, and qualifications to ensure suitability for the proposed role. Potential conflicts of interest are evaluated. Once this assessment is completed, it is presented to the Board and recorded in the minutes of the Board meeting.

Annually, the skills and reputation of the Board as a whole and central functions are evaluated to ensure continued adherence to the fit and proper requirements.

In the fit and proper assessment undertaken during the reporting period by the Compliance Function, the central functions, and the Board, collectively met the required standard of maintaining a good working knowledge in each knowledge area, and individually fulfilled the proper requirements. Each assessed person completed a detailed questionnaire covering: their qualifications and memberships; relevant skills and experience; good repute and character; independence conflicts of interest and confidentiality; and employment history. All the questionnaires were then reviewed and assessed by the Compliance Function. A combined competencies assessment was undertaken and filed with Finansinspektionen during 2021.

Should a situation occur outside of the annual fit and proper assessment process that gives rise to a re-assessment of an individual or central function holder, the Board would be notified and the fitness and probity of the individual re-assessed immediately.

In addition to the above, the Board program includes an annual attestation to the Group Code of Business Conduct and an annual declaration of conflicts of interest.

### B.3. Risk management system including the own risk and solvency assessment

#### B.3.1 Description of the risk management system

The overriding goal of the Company's risk management strategy is to control and achieve, to the greatest extent possible, a reduction in the Company's risk exposure as a means of minimising the impact of undesired and/or unexpected events. The purpose of this is to increase the likelihood of achieving the Company's strategic objectives.

The risk appetite establishes the target amount of risk that the Company is prepared to accept in order to achieve its strategic objectives. Risk appetite balances a cautious management of the operations while achieving shareholder expectations. The primary measure of the Company's aggregate risk appetite is the solvency ratio and the tolerances of this are determined by the Board. The Board also determines risk metrics and tolerances for each risk category that it is exposed to, namely underwriting and reserving risk, reinsurance risk, investment and asset liability management risk and operational risk.

The Board has ultimate responsibility for ensuring that it manages and controls its risk satisfactorily and in order to do this, the governance framework reflects the 'three lines of defense' approach to risk management.

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### First Line of Defense: Operations

The Managing Director and Operations have primary accountability within the context of day-to-day operations. It ensures that operations are carried out correctly and that risk exposures are identified, evaluated, managed, controlled and reported in accordance with the risk appetite and risk policies set by the Board.

A Risk Management Committee from within the operational team will meet at least four times a year to review adherence to the Risk Management Policy across the business and document its findings. The Risk Management Committee is responsible for maintaining the Company's risk register. The risk register identifies all the risks of the business, rates their likelihood of occurrence and the severity of their impact should they occur and ensures that control mechanisms are in place to mitigate, transfer or eliminate each risk as appropriate.

### Second Line of Defense: Risk Management Function

The Risk Management Function is in charge of monitoring the risk management system and the general risk profile of the Company. It provides independent oversight of the Operations' adherence to the Risk Management Policy. It reports directly to the Board providing detailed reporting on risk exposures and advice on risk management matters.

The Risk Management Function will engage at least quarterly with Operational personnel to review risk developments, and independently review outputs, checklists and minutes from the risk management committee. These reviews will be documented and presented to the Board member designated as the Responsible Person with responsibility for Risk Management.

### Third Line of Defense: Internal Audit

The Internal Audit function coordinates risk-based audits to evaluate the adequacy and effectiveness of internal controls in order to challenge the design and effectiveness of the risk management system.

The Internal Audit function has full, free and unrestricted access to all areas of the Company and reports directly to the Board in order to maintain independence and objectivity.

#### **B.3.2 Description of how the risk management function is integrated into the company structure and decision making process**

The Company has a strong risk management culture set by the Board of the Company, and this culture is disseminated through the business of the Company through the business strategy and the various processes and controls which focus on risk exposure.

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As outlined above, all key persons involved in the Company assist in the identification of the risk exposures of the Company, and responsibilities are set for managing the risks to appropriate personnel across various facets of the Company. There is open communication encouraged between risk owners, the Risk Management Committee and the Risk Management Function.

Where concerns or recommendations for alternative mitigations are identified, the risk owners are informed and discussions between the Risk Management Committee or Risk Management Function and operations ensure that the issue is addressed. The Risk Management Committee or Risk Management Function will monitor progress of actions undertaken. The Risk Management Function reports to the Board at the Board meeting following each Risk Management meeting and can escalate issues to the Board outside of these meetings at any time.

All material business transactions are assessed for potential risk exposures. New business opportunities are pursued by the Company only when the risk exposures identified are perceived to be acceptable or able to be mitigated against, and considered proportionate to the size of the business opportunity.

### B.3.3 Description of the ORSA process and how the ORSA is integrated into the organization structure and decision making process

The main purpose of the ORSA process is to define solvency requirements and determine the Company's risk appetite. In addition, the ORSA will identify and evaluate relevant controls and risk mitigating activities. Any potential deficit in solvency identified by the ORSA must be addressed with a specific plan and the Board should decide the actions to be taken.

The ORSA process should be undertaken annually at a minimum, but will be updated if any of the following occurs:

- The risk level exceeds the accepted risk appetite
- There are changes in the underlying assumptions for risk levels/limits
- New insurance classes are introduced or there are major extensions to existing programs
- The risk profile of the Company changes, either because of internal or external changes to the business environment
- A new business strategy is adopted.

The process for completing the ORSA is summarized in the following five sections:

1. Identify, measure and control risks

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All major risks that may threaten Company solvency are identified. The Company has developed methods for evaluating the risks the Company is exposed to.

2. Define risk grading

Appropriate risk grading methods are maintained. The Risk Management Function monitors and measures risk appetite and implements warning systems for when risks are changing and reaching upper limits.

3. Stress testing

Stress tests and scenario analysis are used to define future solvency requirements under certain negative and unexpected situations. Scenarios putting the Company in insolvency (reverse stress tests) may be used for determining in situations which deem the Company insolvent.

The stress tests performed in the recent ORSA were:

	Stress Test Scenario
1	Investment qualities are downgraded
2	Significant increase in the expected loss ratio
3	Whole account quota share reinsurance ends
4	Projected growth is lower

As each stress test is performed, mitigating activities are assessed that would minimize the impact to solvency.

4. Financial plan for stress test

The Solvency Capital Requirement (“SCR”) and Minimum Capital Requirement (“MCR”) and levels of solvency are calculated for each year of the business plan.

5. Potential solvency requirements

The Risk Management Function identifies potential actions for minimizing circumstances of stress tests.

The results of the ORSA provides stakeholders with crucial information to enable critical business decisions to be taken. It provides guidance for the Board of potential risk exposures, solvency requirements and capital planning. The financial projections produced are intended to ensure that the Company is aware of the potential development of its risk profile and capital requirements in various scenarios. In light of this, the results of the ORSA will be used to influence, at least, product development, capital management and Company strategy and allow the Board to determine the capital requirements and set the risk appetite of the Company.

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Once the process and results of the ORSA have been approved by the Board, the results and conclusions regarding the ORSA are communicated to all functions for whom the information is relevant to ensure that any necessary follow up action will be taken. Furthermore, where the ORSA has influenced the business strategy and risk appetite of the Company, central functions are informed in order to ensure that the Company operates within these objectives.

#### B.3.4 Review cycle of ORSA

The ORSA process is undertaken and presented to the Board for approval annually at a minimum. Prior to presenting to the Board, the ORSA will be reviewed and approved by the Managing Director. It will be updated outside this annual cycle if there are any material changes to the risk profile or strategic direction of the Company.

#### B.3.5 How solvency needs have been determined given the risk profile and how capital management activities and risk management systems interact

The ORSA is the Company's own perspective of the capital resources necessary to achieve business strategies and remain solvent given the Company's risk profile. The ORSA identifies and measures all material risks, includes results of stress and scenario testing on business plans and capital resources, and identifies contingent sources of capital support where necessary. There are no risk exposures identified in the risk profile of the Company that are not quantified within the ORSA calculation.

### B.4. Internal control system

#### B.4.1 Description of the internal control system

The Board is responsible for the establishment of the internal control system under the appropriate categories: business risks and operational risks. The internal control system is designed to mitigate key risks facing the Company within these two categories.

To address business risks, the Company has created and maintains key policies and procedures surrounding risk management and its internal controls framework that identify operating and oversight responsibilities for identifying and reporting material deficiencies and fraud. The policies and procedures also identify key internal controls that establish sound accounting and financial reporting procedures. The Company has implemented internal controls to ensure that its underwriting, claims processing, financial reporting and information technology systems and applications mitigate fraud, comply with regulatory requirements and meet the needs of its clients. Primary responsibility for day-to-day oversight of the internal controls framework lies

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with the operations team and control owners. Responsibility and accountability are promoted throughout the Company's activities by ensuring that all controls are assigned to an individual who is aware of their role.

To address operational risk, the Company has an operational risk policy included in the Risk Management Policy that seeks to address how operational risks are managed and controlled. In addition, the Company is subject to adhering to a number of policies established at a Maiden group level. Additional corporate policies that address operational risks include the Maiden Information Governance Policies, Code of Business Conduct and Ethics, Maiden Global Sanctions Program, Maiden Global Fraud Prevention and Detection Policy, Ethics Hotline, IT Policies, HR Policies, Data Protection Policy and procedures, Outsourcing Policy, and controls over financial reporting. The Board approved updates to the Company's Anti-Corruption and Anti-Bribery Policy in 2021.

It is recognised that the Company outsources its administrative and operational activities to a number of parties and the Board is required to review and assess these arrangements in accordance with the Company's Outsourcing Policy.

#### B.4.2 Description of the compliance function

The Board of the Company has the ultimate responsibility for the monitoring of compliance with laws, ordinances and internal regulations and every Board member shall be aware of and observe all external and internal regulations.

To help achieve this aim the Board has established a Compliance Function to supplement not supplant the responsibilities of the Board to ensure compliance with legislation and applicable requirements. The Compliance Function is responsible for:

- assisting the Board with ensuring ongoing compliance with legislation and applicable requirements
- enhancing the Company's awareness of compliance matters
- identifying the areas of possible non-compliance within the Company and understanding the consequences of non-compliance
- informing the Board of directors at Board meetings about such risks
- ensuring that the Board is kept informed of any amendment to the applicable regulations, legislation and guidelines or the addition of any new requirements and the potential impact on the Company
- providing a reasonable assessment of the effectiveness and consistency of the internal processes used to control the compliance of the Company's operations and protect its reputation through recommendations, supervision and independent controls, and
- informing the Board of directors and relevant personnel of new or changed guidelines.

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The Board and the Compliance Function will agree an annual compliance plan, which will detail a monitoring program on key internal controls to ensure that they are operating effectively and to document the tests undertaken and the results obtained.

The Compliance Function reports formally with a written report at least annually to the Board, with updates as necessary.

## B.5. Internal audit

### B.5.1 Description of the internal audit function

The Internal Audit function provides an independent assessment of the adequacy of, and compliance with, the Company's established policies, procedures and risk management framework.

To achieve this, the Internal Audit function:

- establishes, implements and maintains a three year audit plan setting out the audit work to be undertaken in the upcoming years, taking into account all activities and the complete system of governance of the Company;
- takes a risk-based approach in deciding its priorities;
- reports the audit plan to the Board;
- issues recommendations based on the audit work undertaken
- verifies compliance with the decisions taken by the Board in relation to the internal audit recommendations.

The Internal Audit function has full, free and unrestricted access to all activities, records (in both paper and electronic format), property and personnel necessary to accomplish the stated purpose. Documents and information given to the Internal Audit function are handled in the same prudent manner as by those employees normally accountable for them, with stringent regard for safekeeping and confidentiality.

The Internal Audit review and appraisal process does not in any way relieve other persons of the responsibilities assigned to them. Responsibility for complying with policies and procedures as well as correcting deficiencies rests with the respective employees and management.

The Internal Audit function presents in person a written report to the Board no less frequently than annually.

### B.5.2 How the internal audit function remains independent and objective

To permit the rendering of impartial and unbiased judgment essential to the proper conduct of audits, the Internal Audit function is independent of the activities it audits. It does not have

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direct responsibility for, nor authority over, any of the activities reviewed and does not engage in activities which would normally be reviewed by external auditors.

The Internal Audit function reports directly to the Board. This organizational structure is designed to allow Internal Audit to be independent of all other functions within the Company.

## B.6. Actuarial function

The Company's Actuarial Function is responsible for:

- calculating the technical provisions in conjunction with the Company
- reviewing the technical reserves and determining their sufficiency
- drawing conclusions on the appropriateness, accuracy and completeness of the data underlying the calculations
- expressing an opinion on the overall underwriting policy and on the reinsurance arrangements
- contributing to the risk management system.

The Actuarial Function reports directly to the Board and submits a written report to the Board no less frequently than annually.

## B.7. Outsourcing

### B.7.1 Description of the outsourcing policy and information on any central functions that have been outsourced, including the jurisdiction in which the service providers are located

The Company is obliged to establish, implement and maintain effective and transparent systems and controls appropriate to its business. The purpose of the Outsourcing Policy is to establish processes related to outsourcing arrangements and effective reporting and monitoring arrangements of outsourced activities and functions. In addition, the Outsourcing Policy exists to ensure that the Company takes into account the impact of outsourcing on its business and formally considers the additional risks associated with its outsourcing arrangements. The Outsourcing Policy enables the Company to mitigate the risk inherent with such outsourcing arrangements and control the outsourced functions.

Additional Criteria for Outsourcing arrangements:

- that the Service Provider fulfils its obligations in accordance with the outsourcing agreement,
- that the quality of the Company's governance system is not significantly impaired;
- that the operational risk in the Company does not increase significantly;
- that the supervisory authority's ability to exercise supervision is not impaired; and
- that the ability to provide adequate and continuous service to policyholder is maintained.

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Provision for the Outsourcing agreements:

- An unambiguous description/definition of the function(s) to be outsourced and the duties of both parties.
- A notice period for the termination of the contract by the service provider which is long enough to enable the insurance company to find an alternative solution.
- That the insurance company is able to terminate the arrangement for outsourcing where necessary without detriment to the continuity and quality of its provision of services to policyholders.
- The terms and conditions, where applicable, under which the service provider may sub-outsource any of the outsourced functions and activities.
- That the service provider's duties and responsibilities deriving from its agreement with the insurance company shall remain unaffected by any sub-outsourcing.
- An agreed standard of resources and service, supported as necessary by performance measures.
- A requirement for regular detailed reporting to a specific frequency from the service provider in respect of their duties and activities.
- The service provider must have appropriate measures to protect personal data, per prevailing data protection legislation.
- The requirement to comply with all applicable laws and any other guidelines designated by the Company.
- An annual review.
- An outsourcing appendix is included within agreements with outsourced partners as standard. In summary, it requires outsourced partners to comply with applicable laws, grant audit access to the Company and its regulators and have appropriate contingency plans. The outsourcing appendix has been expanded in line with EIOPA's guidelines on outsourcing to cloud service providers.

The Company recognises that it remains fully responsible for all outsourced functions and must have procedures and the necessary expertise to monitor and control the outsourced arrangements. Finansinspektionen is notified of the providers of all outsourced central and critical functions.

The Board of the Company may delegate the appointment of an outsourced partner to management but the initiation of an outsourcing arrangement must be reported to the Board.

The Company has the following outsourcing arrangements for central functions:

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<b>Function</b>	<b>Provider</b>	<b>Jurisdiction</b>
Actuarial	Marsh AB	Sweden
Compliance	Marsh Management Services, Sweden AB	Sweden
Internal Audit	Maiden Global Servicing Company LLC	USA
Risk Management	Maiden Global Holdings Ltd.	UK

The objective of the outsourcing policy is that all material outsourcing arrangements must allow the Company to:

- maintain understanding and control of all aspects of the outsourced function, avoiding additional undue operational risk;
- allow respective regulators to monitor the Company's compliance with jurisdictional laws and regulations;
- demonstrate the ability to measure a service provider's performance; and
- ensure that a service provider has sufficient disaster recovery functions, such that the Company's audit obligations, stability and integrity, cannot be affected by failures of the service provider.

The following is a list of criteria that must be complied with for all new outsourcing agreements and existing material outsourcing agreements:

1. The service provider has the capacity and resources to perform the outsourced functions in a reliable, correct and punctual manner;
2. No conflicts of interest exist that may affect the provision of the outsourced service. Should the service provider be a related party, a referral to the Maiden group Audit Committee is required to approve the terms;
3. The existence of a formal outsourcing agreement between the Company and the service provider, specifically covering the rights and obligations of both the Company and the service provider; and
4. Provision that local data protection law is complied with under the terms of the outsourcing agreement. Specifically, this should govern information exchange between the Company and service provider.

In addition to standard contract provisions, the contract for outsourcing agreements should include the following:

1. A clear description of the receivables, timelines, deliverables, and legal responsibilities of the service provider under the agreement, detailing the responsibilities accepted by the service provider and those retained by the Company;
2. The requirement of the service provider to comply with all applicable laws and any other guidelines designated by the Company;

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3. Provision for monitoring and oversight of the service provider so that any necessary corrective measure can be taken. This would include:
  - a. access to books, records and information relevant to the outsourced activity; and
  - b. right to conduct audits on the service provider whether by the Company's internal or external auditors, or by external specialists appointed by the Company.

The Company recognises that it remains fully responsible for all outsourced functions and must have procedures and the necessary expertise to monitor and control the outsourced arrangements.

The Board of the Company may delegate the appointment of an outsourced partner to management but the initiation of an outsourcing arrangement must be reported to the Board. Where necessary, Finansinspektionen will be notified of a change in the outsourcing provider of a central function.

## B.8. Any other information

### B.8.1 An assessment of the adequacy of the system of governance to the nature, scale and complexity of the risks inherent in the business

The Board considers the system of governance in place within the Company to be appropriate for the scale and complexity of the risks inherent in the Company. The system of governance is subject to regular internal review, an annual review and update of all policies and if there are changes to the underlying risk profile of the Company, the Board will consider whether changes to the system of governance are appropriate and necessary.

### B.8.2 Other material information regarding the system of governance

There is no other material information regarding the Company's system of governance.

## C. Risk Profile

Note: Numbers in EUR 000s.

The Company's risk management discipline focuses on both quantitative and qualitative elements as the means to achieve targeted returns through a balanced analysis and assessment of risk. The quantitative aspect of our risk management practice focuses on understanding and controlling a broad array of risk parameters in order to achieve desired returns. The qualitative aspect of our risk management practice focuses on identifying and assessing risks, and taking the necessary steps to reduce or mitigate unintended risks, or those risks that could threaten the achievement of our business objectives. The Company's risk register documents the assessment of its risk exposures.

The SCR calculated as at 31/12/2021 distributed the required capital across the risk categories as follows:

Risk Category	Proportion of Capital Required
Underwriting	47%
Market & Liquidity	30%
Credit	10%
Operational	13%

From this it is clear that underwriting risk is the greatest risk that the Company is exposed to.

### C.1. Underwriting risk

While the overwhelming majority of the Company's underwriting portfolio has low volatility, material deviation of performance from expected is a key risk. Specific underwriting risks that could unfavorably affect performance and erode capital are:

Inaccurate Pricing. Underwriting performance could be affected by inaccurate pricing and underwriting of risks due to the use of erroneous or incomplete information, data misinterpretation, inaccurate assumptions, or poor or biased judgment.

Macroeconomic Factor Unanticipated, significant increase in claims frequency and/or severity, including the outbreak of a pandemic or recession.

Concentration of Risk/Lack of Diversification of Business. A significant portion of revenue derived from one source or a large presence in a certain market could present concentration risk. The loss of a relationship without replacement would meaningfully reduce its revenue and would require expenses to be spread over the remaining volume of business. With a large presence in a certain market, changes in the jurisdictional, regulatory, or economic environment could impact results.

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**Reserving.** The reserving process has been built to deliver the most accurate estimate possible based on the information available at the time. Reporting lags inherent in insurance claims, future trends and unanticipated events cause a range of uncertainty around where ultimate loss will land when all claims are closed and settled.

Mitigating actions in place:

**Pricing Process:** Where possible, the Company prices products at an individual cover level and uses a ground up approach to ensure the most appropriate assumptions for each product and cover are used.

**Underwriting Performance Monitoring:** Underwriting performance of products is frequently monitored and where adverse performance is experienced, action is taken either to pricing or policy wording to attempt to mitigate a continuation of the trend. Material variations in the losses incurred or claims reserved are investigated and results of this are used to improve the reserving process going forward.

**Loss Reserve Adequacy:** Annually the methodology used for setting loss reserves on a quarterly basis is reviewed internally and by the Actuarial Function. Part of this analysis includes an assessment on the adequacy of the reserves set and whether the corresponding methodology used was appropriate.

**Reinsurance:** Where appropriate, the Company considers the use of reinsurance arrangements to reduce exposure to specific lines of business.

**Diversification:** Strategically the Company is focusing on diversifying the product portfolio in terms of both product and source.

**Company policies:** The Board has approved a number of policies and procedures to assist in mitigating against underwriting risks. Specific policies and procedures that address these risks are the Insurance Technical Guidelines (FTR) including Underwriting Guidelines, Insurance Technical Calculations (FTB), ORSA policy, Risk Management Policy and Business Approval Authority Process.

The Board has defined the risk tolerance for underwriting risk as follows:

Description	Metric	Limits	Tolerance per Limit
Management's right to assume risk on behalf of the Company	Maximum individual risk in relation to available capital *1	€250	Any exceptions to be decided on a case by case basis by the Board of directors

\*The exposure per individual risk, meaning the total possible benefit payable under the insurance policy, potentially across multiple claims.

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## C.2. Market risk

The prudent person principle states the Company only assumes investment risks that it can properly identify, measure, monitor and control, taking into consideration the overall solvency needs of the Company.

The investment of funds by the Company is designed to ensure safety of principal while generating current income. Accordingly, funds are invested in liquid, investment-grade fixed income securities, for which an active market exists and values are determined by a third party. The investment policy is focused on diversification of risk and capital preservation and sets tolerances for investing in high grade marketable fixed income securities, cash and cash equivalents. In order to limit exposure to unexpected interest rate increases which would reduce the value of our fixed income securities and reduce our shareholders' equity, the Company's policy is to maintain the duration of our fixed maturity investment portfolio combined with our cash and cash equivalents within a reasonable range of the duration of our loss reserves.

The Board has established an Investment and Asset-Liability Management Policy and the Investment Committee oversees that this policy is followed. The Company's Investment Policy is an important component of its overall business model and is designed to preserve capital, provide significant liquidity, and produce sufficient investment income to sustain and grow net income while supporting our policyholder's needs. Specific market risks that could unfavorably affect performance and erode capital are:

*Interest Rates:* Investments are interest rate-sensitive and the value of the Company's portfolio may be adversely affected by increases in interest rates. Interest rates are highly sensitive to many factors, including governmental monetary policies, domestic and international economic and political conditions, and other factors beyond the Company's control.

*Foreign Currency:* The Company has exposure to foreign currencies both in investments and within the insurance portfolio. This presents a risk across the balance sheet.

Mitigating actions in place:

*Investment Policy:* The Investment Policy stipulates the investment instruments, duration, currency and credit quality that can be included within the investment portfolio. The parameters around these stipulations have been chosen to ensure that the investment portfolio correctly balances minimizing the risks outlined above while maximizing the return. Adherence to the parameters of the Investment Policy are monitored frequently.

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**Company policies:** The Board has approved a number of policies to assist in mitigating against market risks. Specific policies that address these risks are the Investment and Asset-Liability Management Policy and the Coverage of Technical Provisions Policy.

The Board has defined the risk tolerance for market risk as follows:

Description	Risk Appetite	Metrics and Limits	Tolerance per Limit
<b>Investment Risk: Market Risk</b>	Investment Type	Cash and cash equivalents, government bonds, fixed income products, collateralized loan obligations (CLO's) or inter company loans.	Any exceptions to be decided on a case by case basis by the Board of directors.
	Credit Rating	BBB- or above	Any exceptions to be decided on a case by case basis by the Board of directors.
	Concentration of credit rating	Maximum 40% of portfolio, including cash and cash equivalents, held in securities rated BBB/Baa	Any deviations to be reported to the Board of directors.
<b>Investment Risk: Matching Risk</b>	Covering of technical provisions	Covered by assets corresponding to at least 110% of the technical provisions.	The Board shall be notified when the Company's coverage reaches 120%.
<b>Investment Risk: Concentration Risk</b>	ORSA Capital	Maintain solvency capital above 150%	Tolerances per risk appetite statement

### C.3. Credit risk

As a result of relationships with counterparties, the Company is exposed to credit risk through:

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**Investment Portfolio:** The Company bears the risk of ratings downgrades of securities in its investment portfolio. Further, for any fixed income portfolio, impairment or default of individual securities is always a risk.

**Receivables:** The Company bears the risk of collecting of premium payments.

**Reinsurance Recoverables:** Where reinsurance is entered into to mitigate against underwriting risks, such arrangements expose the Company to additional counterparty credit risk.

**Financial Institutions:** The Company holds the appropriate level of cash required to service forecast cashflows.

Mitigating actions in place:

**Aged Debtors:** The Company continually monitors and manages debtors and actively pursues overdue accounts.

**Credit Risk:** The majority of debtors are third party administrators (“TPAs”) appointed to manage the premium collection from policyholders on behalf of the Company. Prior to appointment, all TPAs undergo a due diligence review to ensure that their financial stability is an appropriate risk for the Company to undertake as a debtor.

**Reinsurance Recoverables:** To counter the credit risk on the reinsurance arrangements, the Company will assess the credit rating of the reinsurance entity and require assurance of funds where necessary. A letter of credit or funds withheld structure may be put in place for additional security.

**Cashflow forecasting:** Regular cashflow forecasting ensures that excessive amounts of cash are not held.

**Company policies:** The Board has approved a number of policies to assist in mitigating against credit risks. Specific policies that address these risks are the Investment and Asset-Liability Management Policy, Insurance Technical Guidelines (FTR) including Underwriting Guidelines and the Outsourcing Policy.

The Board has defined the risk tolerance for reinsurance risk as follows:

Description	Metric	Limit	Tolerance per Limit
Management's right to place reinsurance on behalf of the Company	External reinsurance entity S&P rating	S&P rating AA- or above or suitable security (funds withheld or letter of credit)	Any exceptions to be decided on a case by case basis by the Board of directors

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	Group company reinsurance	AM Best rating B or above	Any exceptions to be decided on a case by case basis by the Board of directors
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With effect from 1 October 2021 the Board approved the inception of an inter company whole account Quota Share reinsurance agreement with Maiden Reinsurance Ltd., a sister company domiciled in the State of Vermont, United States as an exception to the risk tolerances.

#### C.4. Liquidity risk

The inherent nature of insurance claims are such that unanticipated significant claims activity under the insurance contracts, outside the Company’s historical experience, could impact liquidity at any time.

Mitigating actions in place:

Investment Criteria: A portfolio of highly liquid fixed income securities is maintained.

Financial Monitoring and Forecasting: Regular cashflow forecasting ensures that there is sufficient liquidity to meet upcoming obligations without liquidizing investments at short notice and potentially not maximizing the return on investment.

Company Policies: The Board has approved a number of policies to assist in mitigating against liquidity risks. Specifically, the Investment and Asset-Liability Management policy addresses these risks.

The Board has defined the risk tolerance for liquidity risk as follows:

Description	Metrics	Limits	Tolerance per Limit
<b>Investment Risk: Liquidity Risk</b>	Investment Duration	Maximum ten years.	Any exceptions to be decided on a case by case basis by the Board of directors.
	Anticipated liquidity	All fixed income products shall be capable of being converted to cash within ten days.	Any exceptions to be decided on a case by case basis by the Board of directors.

## C.5. Operational risk

Operational risk includes the risk of loss from inadequate or failed internal processes, people, systems and/or external events. Operational risk also includes legal risks. These types of operational failures could negatively impact the Company's reputation with customers, clients, shareholders, and regulators.

The Company is exposed to operational risk through:

*Business Process Risks:* The risk of data entry and data processing errors arising from application design misspecifications. Included in this category is the risk that models used in the business have errors embedded within, are incorrectly used, are changed without approval or become unfit for use.

*Business Continuity Risks:* The risks that threaten or disrupt continuous operations. This comprises business interruption that impacts the ability to access facilities or IT systems.

*Compliance Risks:* The risk that legal and regulatory breaches that could cause financial or reputational damage.

*Cyber/Information Systems Risks:* The risk of unauthorized access to systems and data, data loss, utility disruptions, software and hardware failures, and inability to access information systems.

*Fraud Risks:* Fraud risk includes intentional misconduct or unauthorized activities such as misappropriation of assets, information theft, forgery, and fraudulent claims.

*Outsourcing Risks:* This is the risk that outsourcing partners are incapable to continue to provide the necessary services.

*Business Risk:* This is the risk that the Company's underlying business becomes unsustainable due to a change in the regulatory environment or profitability.

Mitigating actions in place:

*Company Policies and Procedures:* There are a number of policies and procedures in place throughout the organization that mitigate operating risk. These include the following: Maiden Information Governance Policies, Code of Business Conduct and Ethics, Maiden Global Sanctions Program, Maiden Global Fraud Prevention and Detection Policy, Ethics Hotline, IT Policies, HR Policies, Data Protection Policy and procedures, Outsourcing Policy, and controls over financial reporting.

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**Compliance Global Monitoring and Reporting Program:** In order to mitigate the risk of financial or reputational damage, the Compliance Function is responsible for the prevention, detection and remediation of compliance failures and risks.

The Board has defined the risk tolerance for operational risk as follows:

Description	Metrics	Metrics and Limits	Tolerance per Limit
Management's authority to undertake operational risk on behalf of the Company	Net risk exposure rating on risk register	High or very high	All operational risks rated high or very high to be reported to Board

## C.6. Other material risks

### C.6.1 Risk exposure, including exposure arising from off balance sheet positions and the transfer of risk to special purpose vehicles

The Company has no off balance sheet positions or Special Purpose Vehicles.

### C.6.2 Measures used to assess risks and any material changes

Risk Category	Risk	Measures Used to Assess Risk
Underwriting	Inaccurate Pricing	<ul style="list-style-type: none"> <li>Underwriting performance</li> <li>Analysis of claims</li> <li>Assessment of priced assumptions</li> </ul>
Underwriting	Macroeconomic Factors	<ul style="list-style-type: none"> <li>Underwriting performance</li> <li>Analysis of claims</li> <li>Monitoring of economic indicators</li> </ul>
Underwriting	Concentration of Risk/Lack of Diversification of Business	Proportion of business by line of business and geography
Underwriting	Reserving	<ul style="list-style-type: none"> <li>Loss ratio performance</li> <li>Movements in loss reserves</li> <li>Adequacy of technical provisions</li> </ul>
Market	Interest Rates	<ul style="list-style-type: none"> <li>Investment performance</li> </ul>
Market	Foreign Currency	Assets and liabilities by currency
Credit	Investment Portfolio	<ul style="list-style-type: none"> <li>Adherence to Investment criteria stipulated in Investment Guidelines</li> </ul>
Credit	Receivables	<ul style="list-style-type: none"> <li>Aged debtors</li> <li>Credit worthiness of debtors</li> </ul>
Credit	Reinsurance Recoverables	<ul style="list-style-type: none"> <li>Credit worthiness of reinsurer</li> <li>Adherence to payment terms</li> </ul>

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Risk Category	Risk	Measures Used to Assess Risk
		<ul style="list-style-type: none"> <li>Mitigations in place e.g. letters of credit or funds withheld</li> </ul>
Credit	Financial Institutions	<ul style="list-style-type: none"> <li>Credit rating</li> </ul>
Liquidity	Unanticipated cash required	Cashflow forecasting
Operational		<ul style="list-style-type: none"> <li>Service Level monitoring of TPAs</li> <li>Annual TPA review</li> </ul>
All	All	Capital required and solvency margin

There have been no material changes to the measures used to assess risk exposures.

### C.6.3 Description of the material risks and any material changes

The risks that are rated high within the Company risk register are as follows:

- **Data Risk:** The risk that data received from Third Party Administrators (“TPAs”) relating to policies or claims is of poor quality. Obligations for data provision are included in contracts with TPAs and data received is monitored regularly for quality and accuracy.
- **Solvency Risk:** The risk that as the business grows, the solvency margin cannot be maintained either through a lack of capital or uncontrolled growth. Capital forecasts are undertaken annually through the completion of the ORSA or when the risk profile of the Company materially changes.
- **UK Underwriting Capabilities:** The risk that the Company is unable to continue to service insurance policyholders in the UK if its deemed Part 4a permission allowed under the UK’s Temporary Permission Regime were to end.
- **Regulatory Risk (Compliance):** The risk that the Company fails to comply with regulation, such as Solvency II or EIOPA’s Guidelines on Outsourcing to Cloud Service Providers. The Company has a suitable governance structure in place to ensure compliance and follows regulatory developments for changes to regulation.
- **Regulatory Risk (Insurance Products):** The risk that regulatory changes in a country in which the Company operates has material implications for existing or planned products. The Company closely follows regulatory developments and assesses the potential impact on the products underwritten by the Company.
- **General Data Protection Regulation (“GDPR”) Risk:** The risk that GDPR regulations are breached. GDPR requirements are monitored at a program level, are included in product launch requirements and are regularly monitored to ensure continued compliance.
- **Business Development Risk:** The risk that the Company cannot generate profitable new business. New business opportunities are being actively pursued and all new business undergoes pricing and underwriting review prior to launch, and regular monitoring of profitability once live.

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During 2021, there were no additional risks that the Company is exposed to that were rated high. One high rated risk, the increased reliance on a particular outsourced provider for the provision of cloud based Software as a Service for insurance administration services, was downgraded from high to tolerable. The reduced risk is primarily due to a significant decrease in the number of insureds being administered by the provider effective February 1<sup>st</sup>, 2022.

#### C.6.4 Material risk concentrations

A material risk concentration refers to an exposure with the potential to produce losses large enough to threaten a company's ability to remain solvent (or maintain its core operations).

The Company manages concentration of credit risk in the investment portfolio through issuer and credit rating limitations. The Company believes it bears minimal credit risk on its cash on deposit. As a result, the Company does not consider itself to be exposed to any significant credit concentration risk on its investments.

The Company has exposure to credit risk on premiums due from third party partners and losses recoverable from reinsurance partners. This risk is spread across a number of different third parties. Any third party who holds money on behalf of the Company is evaluated for their financial security prior to holding Company money, credit terms are strictly monitored and debts pursued where overdue. For reinsurance partners, programs may be operated on a funds withheld basis to counter credit risk, and where appropriate there may be further security in the form of a letter or credit. As a result, the Company does not consider itself to be exposed to any significant risk concentration on amounts owed.

The implementation of the new intercompany Quota Share reinsurance agreement presents a potential for concentration risk. The Company manages this potential risk through a funds withheld arrangement, and contractual requirements for minimum notice of cancellation periods to be observed.

#### C.7. Any other information

There is no other material information regarding the risk profile of the Company.

## D. Valuation for Solvency Purposes

*Note: Numbers in EUR 000s.*

### D.1. Assets

#### D.1.1 Separately for each material class of assets, the value of the assets, a description of the bases, methods and main assumptions used for the valuation for solvency purposes

As at 31/12/2021 the Company held the following investments:

Government & Corporate bonds	€7,691
Cash & Cash Equivalents	€4,236

All Government and Corporate bonds were rated at least BBB (S&P) and were traded on an active market. The fair value of the bonds was determined as the market price. All government bonds are of rating AA (S&P).

The Company has classified the financial investments as financial instruments according to IAS 39 (International Accounting Standards). A financial asset or financial liability should be classified as a financial instrument if it meets following conditions:

- It is acquired or incurred principally for the purpose of selling or repurchasing it in the near term
- On initial recognition it is part of a portfolio of identified financial instruments that are managed together and for which there is evidence of a recent actual pattern of short-term profit-taking, or
- It is a derivative (except for a derivative that is a financial guarantee contract or a designated and effective hedging instrument).

#### D.1.2 Description of material differences, quantitative and qualitative, between the valuation bases, assumptions and methods used for the valuation for solvency purposes and those used for valuation in the financial statements

The total valuation difference between valuation bases, assumptions and methods used for the valuation for solvency purposes is displayed in section D.2 below.

## D.2. Technical provisions

### D.2.1 Valuation, valuation bases, assumptions and methods to derive the value of technical provisions for solvency purposes

#### TECHNICAL PROVISIONS

Solvency II requires Technical Provisions to be segmented by Solvency II lines of business. The Company's segmentation of lines of business is dependent on International Financial Reporting Standards ("IFRS") reserving process that groups the risks using reserving classes. Reserving classes are further split by country and then allocated by currency. The reserves cash flows are discounted by applying risk-free yield curves by currency that are provided by the European Insurance and Occupational Pensions Authority ("EIOPA") to get Technical Provisions by reserving classes. Technical Provisions by reserving classes are then mapped to the Solvency II lines of business.

#### VALUATION BASIS, METHODS AND MAIN ASSUMPTIONS

The technical provisions are defined as the probability-weighted average of future cash flows, discounted to take into account the time value of money considering all possible future scenarios. The cash flow projection used in the calculation of the best estimate takes account of all the cash in-flows and out-flows required to settle the insurance and reinsurance obligations over their lifetime.

Technical provisions are grouped into the following key components:

- Gross claims provisions: Best Estimate of provisions that relate to the earned exposure.
- Gross premium provisions: Best Estimate of provisions that relate to the unearned exposure i.e. driven from unearned premium and policies which are bound but not yet incepted at the valuation date.
- Risk margin: Additional provision to bring the Best Estimates to the level required to transfer the obligations to a third party undertaking.

#### GROSS CLAIMS PROVISIONS

The IFRS IBNR reserves are calculated at an individual program level and for class 1a) life and class 1b) supplementary life separately. Typically, the calculation is a function of recently earned premium volumes, expected lags in claims reporting, expected loss ratios and average claim payments. The calculation is specific to the individual program and is tailored to account for the specific characteristics of that program. IFRS best estimate of IBNR and case reserves are

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used as the starting point to estimate the gross claims provisions before the following adjustments are applied:

- Expenses
- Discounting
- Reinsurance recoveries

#### GROSS PREMIUM PROVISIONS

The Unearned Premium Reserve includes the unearned premium balance as at the valuation date and is used as the starting point to estimate gross best estimate premium provisions before the following adjustments are applied:

- Application of budget loss ratios to reduce the unearned premium reserve for claims liability
- Policies which are bound but not yet incepted at the valuation date
- Expenses
- Discounting
- Future premium (payables and receivables)
- Reinsurance recoveries

The Company has €11 Unearned Premium Reserve as at 31/12/2021.

The calculation of the expected profit included in future premiums has been carried out separately for the homogeneous risk groups used in the calculation of the technical provisions.

The expected profit included in the unearned premiums, net of reinsurance, as calculated for 2020 is EUR 1.

#### REINSURANCE RECOVERIES

The reinsurance recoveries are calculated separately for the claims provision and the premiums provision, with the ceded IFRS reserves and ceded unearned premium reserve respectively used as the starting point in the calculation.

For materiality reasons, the reinsurance payables are adjusted by the undiscounted value associated with the losses. This will be revisited annually.

#### RISK MARGIN

The simplified method (simplifications method 1) described in the document “Guidelines on the valuation of technical provisions”, EIOPA-BoS-14/166, guideline 62) approximates the individual

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risks or sub-risks within some or all modules and sub-modules to be used for the calculation of future Solvency Capital Requirements.

VALUE OF TECHNICAL PROVISIONS FOR EACH LINE OF BUSINESS (EUR 000)

Line of Business	Gross Best Estimate	Risk Margin	Total Gross Technical Provisions	Reinsurance Best Estimate
Health, related to Life	3,185	18	3,204	425
Other Life	1,354	94	1,448	204

D.2.2 The level of uncertainty associated with the value of technical provisions

The main contributors for uncertainty are:

- Uncertainty in cash flows. The payment of current and future claims is dependent on the cash flows projected by the Company
- Uncertainty in expenses. Actual expense may differ from the expected expense used in the calculations
- Uncertainty in assessing future claim amounts. Plan loss ratios are used to calculate the expected losses from unearned business in the premium provisions
- Uncertainty from model error. Model error occurs when the methodology used does not accurately reflect the development process for the line of business (i.e. misspecification of the model).

The level of uncertainty is mitigated against through the various risk management procedures in place. In particular, pricing and financial forecasting is stress tested to establish the level of variance that the Company can withstand. The level of uncertainty associated with the value of the technical provisions is within the risk appetite of the Company.

D.2.3 Separately for each material line of business, a qualitative and quantitative explanation of any material differences between the bases, methods and main assumptions used for the valuation for solvency purposes and those used for valuation in its financial statements

Below are the material differences between the Solvency II balance sheet and the statutory balance sheet.

Technical provisions (amounts in EUR 000)

Items	Statutory	Solvency II	Difference
Technical provision/ Best estimates	-4,034	--4,539	-505

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Risk Margin	0	-113	-113
Total	-4,034	-4,652	-617

Reinsurance share of technical provisions (amounts in EUR 000)

Items	Statutory	Solvency II	Difference
Technical provision/ Best estimates	1,462	628	-833

The total difference between the valuation of the above assets and liabilities is -1,450 EUR.

#### Best estimate

The technical provisions are to be valued at the current amount that the Company would have to pay if they were to transfer their insurance obligations immediately to another insurance company. The best estimate shall correspond to the probability-weighted average of future cash-flows, taking account of the time value of money (expected present value of future cash-flows), using the relevant risk-free interest rate term structure. The best estimate shall be calculated separately for the premium provision and for the provisions for claims outstanding for non-life insurance obligations.

#### Risk margin

The risk margin is related to the amount that insurance and reinsurance undertakings would be expected to require in order to take over and meet the insurance obligations of the Company. The risk margin has been calculated by using one of the simplification methods described in the Technical Specifications. The simplified method (simplifications method 1) described in the document "Guidelines on the valuation of technical provisions", EIOPA-BoS-14/166, guideline 62) approximates the individual risks or sub-risks within some or all modules and sub-modules to be used for the calculation of future Solvency Capital Requirements.

The largest differences are found in the Best Estimate of technical provisions and the Risk margin. In addition, the revaluation of these creates deferred tax asset on the Company balance sheet.

#### D.2.4 Matching adjustment

The matching adjustment is not applicable for the Company.

#### D.2.5 Volatility adjustment

The volatility adjustment is not applicable for the Company.

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#### D.2.6 Transitional risk-free interest rate-term structure

The transitional risk-free interest rate-term structure is not applicable for the Company.

#### D.2.7 Transitional deduction

The transitional deduction is not applicable for the Company.

#### D.2.8 Recoverables from reinsurance contracts and special purpose vehicles

Reinsurance recoverables are expected to be valued on a basis consistent with the insurance obligations. Allowance shall be made for any reinstatement premiums that may be payable to reinsurers. Allowance shall be made for expected uncollectable amounts.

Statutory reinsurance recoverables as of December 31, 2021 were €1,462.

#### D.2.9 Material changes in the relevant assumptions made in the calculations of technical provisions compared to the prior period

There are no material changes in the assumptions made in the calculations of technical provisions compared to the prior period.

### D.3. Other liabilities

#### D.3.1 Valuation, valuation bases, assumptions and methods to derive the value of other liabilities for solvency purposes

The Company has evaluated that all other assets and liabilities on the Company's balance sheet are in compliance with the valuation principles stated in the Solvency II legislation.

#### D.4. Alternative methods for valuation

Alternative methods of valuation are not applicable for the Company.

#### D.5. Any other information

There is no other material information regarding the valuation of assets and liabilities for solvency purposes.

## E. Capital Management

Note: Numbers in EUR 000s.

### E.1. Own Funds

#### E.1.1 Overview

The Company's primary capital management objectives are to maintain a strong capital base to support the development of the business and to meet regulatory requirements at all time. The Company aims to continue to grow capital through profitable underwriting and operating results.

The Board sets a solvency capital target annually in line with the Company's risk appetite and seeks to maintain at least this level of solvency at all times. Capital adequacy is included within every financial report, which is presented to the Board at each Board meeting, and solvency margins are reported more frequently to the Board when required.

Annually the Company undertakes the completion of the ORSA to determine projected capital requirements including scenario testing, over a three year time horizon; more frequent reviews would be conducted if there are major changes contemplated in any capital driver.

There have been no material changes in the capital management policy.

#### E.1.2 Amount and quality of own funds categorized for each tier

	Total Own Funds	Tier 1 (Reconciliation Reserve)	Tier 3 (Deferred Tax Asset)
31 <sup>st</sup> December 2021	€6,639	€5,848	€791
31 <sup>st</sup> December 2020	€8,338	€7,989	€349
31 <sup>st</sup> December 2019	€9,178	€8,899	€279

#### E.1.3 Eligible own funds categorized by tiers to cover SCR

All own funds are tier 1 and tier 3 assets and are eligible to cover the SCR.

#### E.1.4 Eligible own funds categorized by tiers to cover MCR

All own funds that are tier 1 assets are eligible to cover the MCR.

#### E.1.5 Transitional arrangements

There are no transitional arrangements.

#### E.1.6 Ancillary own funds

There are no ancillary own funds.

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E.1.7 Description of any item deducted from own funds and a brief description of any significant restriction affecting the availability and transferability of own funds

There are no items deducted from own funds and no significant restrictions affecting the availability and transferability of own funds.

E.2. Solvency Capital Requirement and Minimum Capital Requirement

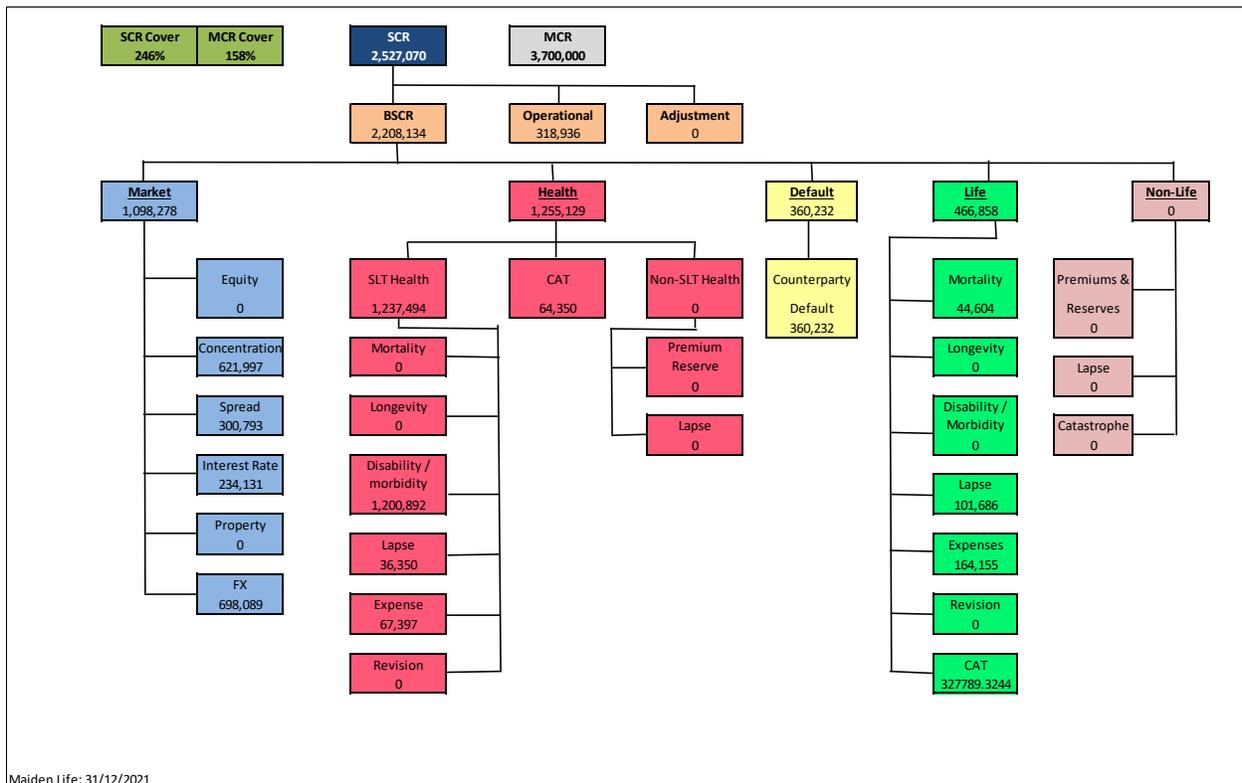
E.2.1 SCR and MCR requirements at the end of the reporting period

Amount of the SCR and MCR at the end of the reporting period:

SCR	€ 2,527
MCR	€ 3,700

E.2.2 The amounts of the SCR split by risk modules

The SCR tree below presents the Company's SCR and MCR, separated by risk category, as at December 31<sup>st</sup>, 2021.



E.2.3 Information on whether simplified calculations are used and for which risk modules and sub modules of the standard formula

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The risk margin has been calculated by using one of the simplification methods described in the Technical Specifications. Simplification Method 1, prescribed by EIOPA-BoS-14/166, guideline 62 is used.

**E.2.4 Information on whether and for which parameters of the standard formula the undertaking is using undertaking specific parameters pursuant to Article 107(7)**

The Company is not using any specific parameters pursuant to article 107(7).

**E.2.5 Information on the inputs used to calculate the MCR**

The information that has been used for the MCR and SCR calculations is approved by the Board of the Company and the Actuarial Function.

**E.2.6 Any material changes to the SCR and MCR over the reporting period and the reasons for such changes**

The SCR and MCR have fluctuated over the period as a result of changes to the underlying risk, new business commencing and the execution of the whole account quota share agreement.

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

The Company is not utilizing the equity based sub module.

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

The Company is not using an approved internal capital model.

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

There have been no periods of non-compliance with the MCR or SCR.

**E.6. Any other information**

There is no other material information regarding the capital management of the Company.

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**S.02.01.01.01 Balance sheet**

			Solvency II value	Statutory accounts value
			C0010	C0020
Assets	Goodwill	R0010		
	Deferred acquisition costs	R0020		
	Intangible assets	R0030		
	Deferred tax assets	R0040	790,591	630,659
	Pension benefit surplus	R0050		
	Property, plant & equipment held for own use	R0060		
	Investments (other than assets held for index-linked and unit-linked contracts)	R0070	7,691,243	7,691,243
	Property (other than for own use)	R0080		
	Holdings in related undertakings, including participations	R0090		
	Equities	R0100		
	Equities - listed	R0110		
	Equities - unlisted	R0120		
	Bonds	R0130	7,691,243	7,691,243
	Government Bonds	R0140	1,785,950	1,785,950
	Corporate Bonds	R0150	5,905,293	5,905,293
	Structured notes	R0160		
	Collateralised securities	R0170		
	Collective Investments Undertakings	R0180		
	Derivatives	R0190		
	Deposits other than cash equivalents	R0200		
	Other investments	R0210		
	Assets held for index-linked and unit-linked contracts	R0220		
	Loans and mortgages	R0230		
	Loans on policies	R0240		
	Loans and mortgages to individuals	R0250		
	Other loans and mortgages	R0260		
	Reinsurance recoverables from:	R0270	628,355	1,461,632
	Non-life and health similar to non-life	R0280		1,461,632
	Non-life excluding health	R0290		328,412
	Health similar to non-life	R0300		1,133,221
	Life and health similar to life, excluding health and index-linked and unit-linked	R0310	628,355	
	Health similar to life	R0320	424,691	
	Life excluding health and index-linked and unit-linked	R0330	203,665	
	Life index-linked and unit-linked	R0340		
Deposits to cedants	R0350			
Insurance and intermediaries receivables	R0360	721,700	721,700	
Reinsurance receivables	R0370	628,383	628,383	
Receivables (trade, not insurance)	R0380	44,918	44,918	
Own shares (held directly)	R0390			
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400			
Cash and cash equivalents	R0410	4,236,291	4,236,291	
Any other assets, not elsewhere shown	R0420	6,489	6,489	
<b>Total assets</b>	<b>R0500</b>	<b>14,747,972</b>	<b>15,421,316</b>	

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**S.02.01.01.01 Balance sheet**

			Solvency II value	Statutory accounts value
			C0010	C0020
Liabilities	Technical provisions - non-life	R0510		4,034,487
	Technical provisions - non-life (excluding health)	R0520		4,034,487
	Technical provisions calculated as a whole	R0530		
	Best Estimate	R0540		
	Risk margin	R0550		
	Technical provisions - health (similar to non-life)	R0560		
	Technical provisions calculated as a whole	R0570		
	Best Estimate	R0580		
	Risk margin	R0590		
	Technical provisions - life (excluding index-linked and unit-linked)	R0600		4,034,487
	Technical provisions - health (similar to life)	R0610	4,651,615	3,174,771
	Technical provisions calculated as a whole	R0620	3,203,854	
	Best Estimate	R0630	3,185,469	
	Risk margin	R0640	18,385	
	Technical provisions - life (excluding health and index-linked and unit-linked)	R0650	1,447,761	859,716
	Technical provisions calculated as a whole	R0660		
	Best Estimate	R0670	1,353,589	
	Risk margin	R0680	94,172	
	Technical provisions - index-linked and unit-linked	R0690		
	Technical provisions calculated as a whole	R0700		
	Best Estimate	R0710		
	Risk margin	R0720		
	Other technical provisions	R0730		
	Contingent liabilities	R0740	613,197	613,197
	Provisions other than technical provisions	R0750		
	Pension benefit obligations	R0760		
	Deposits from reinsurers	R0770		
	Deferred tax liabilities	R0780		
	Derivatives	R0790		
	Debts owed to credit institutions	R0800		
	Financial liabilities other than debts owed to credit institutions	R0810		
	Insurance & intermediaries payables	R0820		
Reinsurance payables	R0830	79,938	753,972	
Payables (trade, not insurance)	R0840	2,375,661	2,375,661	
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	388,214	388,214	
Total liabilities	R0900	8,108,625	12,200,017	
Excess of assets over liabilities	R1000	6,639,346	3,221,299	

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S.05.01.01.02 Life  
Z Axis:

		Line of Business for: life insurance obligations						Life reinsurance obligations		Total
		Health insurance	Insurance with profit participation	Index-linked and unit-linked insurance	Other life insurance	Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations	Health reinsurance	Life reinsurance	
		C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0300
Premiums written	Gross	R1410	7,877			2,684				10,561
	Reinsurers' share	R1420	1,810			799				2,609
	Net	R1500	6,067			1,885				7,951
Premiums earned	Gross	R1510	7,985			2,793				10,778
	Reinsurers' share	R1520	1,921			884				2,805
	Net	R1600	6,064			1,909				7,973
Claims incurred	Gross	R1610	1,889			282				2,171
	Reinsurers' share	R1620	336			-32				304
	Net	R1700	1,553			314				1,867
Changes in other technical provisions	Gross	R1710	1,553			314				1,867
	Reinsurers' share	R1720								
	Net	R1800	1,553			314				1,867
Expenses incurred		R1900	5,309			1,830				7,139
		R1910	2,200			930				3,130
	Administrative expenses	Gross								
		R1920								
		Reinsurers' share								
	Net	R2000	2,200			930				3,130
	Investment management expenses	Gross	R2010							
		R2020								
		Reinsurers' share								
	Net	R2100								
	Claims management expenses	Gross	R2110							
		R2120								
		Reinsurers' share								
	Net	R2200								
	Acquisition expenses	Gross	R2210	4,205			1,353			
	R2220		1,096			453				1,549
	Reinsurers' share									
Net	R2300	3,109				900				4,009
Overhead expenses	Gross	R2310								
	R2320									
	Reinsurers' share									
Net	R2400									
Other expenses		R2500								
Total expenses		R2600								7,139
Total amount of surrenders		R2700								

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**S.05.02.01.04 Home Country - life obligations**

Z Axis:

Home country
Home country
C0220

Premiums written	Gross	R1410	4,029
	Reinsurers' share	R1420	766
	Net	R1500	3,264
Premiums earned	Gross	R1510	4,032
	Reinsurers' share	R1520	766
	Net	R1600	3,267
Claims incurred	Gross	R1610	361
	Reinsurers' share	R1620	199
	Net	R1700	162
Changes in other technical provisions	Gross	R1710	
	Reinsurers' share	R1720	
	Net	R1800	
Expenses incurred		R1900	2,246
Other expenses		R2500	
Total expenses		R2600	

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**S.05.02.01.05 Top 5 countries (by amount of gross premiums written) - life obligations**

Z Axis:

			Other than home country				
			Country (by amount of gross premiums written) - life obligations				
			DENMARK	FINLAND	IRELAND	NORWAY	UNITED KINGDOM
			C0230_61	C0230_75	C0230_106	C0230_166	C0230_234
Premiums written	Gross	R1410	1,614	116	2,442	116	2,236
	Reinsurers' share	R1420	278	53	421	97	995
	Net	R1500	1,336	63	2,021	19	1,242
Premiums earned	Gross	R1510	1,614	77	2,442	344	2,262
	Reinsurers' share	R1520	278	29	421	316	995
	Net	R1600	1,336	48	2,021	28	1,267
Claims incurred	Gross	R1610	439	22	1,267	-434	247
	Reinsurers' share	R1620	144	8	219	443	174
	Net	R1700	295	13	1,048	-877	73
Changes in other technical provisions	Gross	R1710					
	Reinsurers' share	R1720					
	Net	R1800					
Expenses incurred		R1900	391		819	9	519
Other expenses		R2500					
Total expenses		R2600					

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**S.05.02.01.06 Total Top 5 and home country - life obligations**

Z Axis:

Life and Health SLT
Total Top 5 and home country
C0280

Premiums written	Gross	R1410	10,554
	Reinsurers' share	R1420	2,609
	Net	R1500	7,944
Premiums earned	Gross	R1510	10,771
	Reinsurers' share	R1520	2,805
	Net	R1600	7,966
Claims incurred	Gross	R1610	2,101
	Reinsurers' share	R1620	304
	Net	R1700	1,797
Changes in other technical provisions	Gross	R1710	
	Reinsurers' share	R1720	
	Net	R1800	
Expenses incurred		R1900	3,985
Other expenses		R2500	
Total expenses		R2600	3,985

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**S.12.01.01.01 Life and Health SLT Technical Provisions**

			Other life insurance		Total (Life other than health insurance, incl. Unit-Linked)	Health insurance (direct business)		Total (Health similar to life insurance)	
			C0060	Contracts without options and guarantees		C0160	Contracts without options and guarantees		
			C0070	C0150		C0170	C0210	C0210	
Technical provisions calculated as a whole			R0010						
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole			R0020						
Technical provisions calculated as a sum of BE and RM	Best Estimate	Gross Best Estimate	R0030	1,354	1,354		3,185	3,185	
		Total recoverables from reinsurance/SPV and Finite Re before the adjustment for expected losses due to counterparty default	R0040	204	204		425	425	
		Recoverables from reinsurance (except SPV and Finite Re) before adjustment for expected losses	R0050	204	204		425	425	
		Recoverables from SPV before adjustment for expected losses	R0060						
		Recoverables from Finite Re before adjustment for expected losses	R0070						
		Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0080	204	204		425	425	
		Best estimate minus recoverables from reinsurance/SPV and Finite Re	R0090		1,150	1,150		2,761	2,761
		Risk Margin	R0100	94		94	18		18
		Amount of the transitional on Technical Provisions			R0110				
		Technical Provisions calculated as a whole			R0120				
Best estimate			R0130						
Risk margin			R0130						
Technical provisions - total			R0200	1,448	1,448	3,204	3,204		
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total			R0210	1,244	1,244	2,779	2,779		
Best Estimate of products with a surrender option			R0220	1,150	1,150	2,761	2,761		
Gross BE for Cash flow	Cash out-flows	Future guaranteed and discretionary benefits	R0230	2,320	2,320	3,999	3,999		
		Future guaranteed benefits	R0240						
		Future discretionary benefits	R0250						
	Cash in-flows	Future expenses and other cash out-flows	R0260	4,237	4,237	1,640	1,640		
		Future premiums	R0270	5,204	5,204	2,453	2,453		
		Other cash in-flows	R0280						

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**S.23.01.01.01 Own funds**  
Z Axis:

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35	Ordinary share capital (gross of own shares)	R0010	5,000			
	Share premium account related to ordinary share capital	R0030	5,000			
	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	849	849		
	Subordinated liabilities	R0140				
	An amount equal to the value of net deferred tax assets	R0160	379			379
	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	R0220					
Deductions	Deductions for participations in financial and credit institutions	R0230				
<b>Total basic own funds after deductions</b>		R0290	<b>6,228</b>	<b>5,849</b>		<b>379</b>
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				
<b>Total ancillary own funds</b>		R0400				
Available and eligible own funds	Total available own funds to meet the SCR	R0500	<b>6,228</b>	<b>5,849</b>		<b>379</b>
	Total available own funds to meet the MCR	R0510	<b>5,849</b>	<b>5,849</b>		
	Total eligible own funds to meet the SCR	R0540	<b>6,228</b>	<b>5,849</b>		<b>379</b>
	Total eligible own funds to meet the MCR	R0550	<b>5,849</b>	<b>5,849</b>		
	SCR	R0580	2,527			
MCR	R0600	3,700				
Ratio of Eligible own funds to SCR	R0620	246%				
Ratio of Eligible own funds to MCR	R0640	158%				

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**S.23.01.01.02 Reconciliation reserve**

Z Axis:

			C0060
Reconciliation reserve	Excess of assets over liabilities	R0700	6,639
	Own shares (held directly and indirectly)	R0710	
	Foreseeable dividends, distributions and charges	R0720	
	Other basic own fund items	R0730	5,379
	Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	412
Reconciliation reserve		R0760	849
Expected profits	Expected profits included in future premiums (EPIFP) - Life business	R0770	
	Expected profits included in future premiums (EPIFP) - Non-life business	R0780	
Total Expected profits included in future premiums (EPIFP)		R0790	

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**S.23.02.01.01 Basic own funds**

Z Axis:

			Total	Tier 1		Tier 2		Tier 3
			C0010	C0020	Of which counted under transitionals C0030	C0040	Of which counted under transitionals C0050	C0060
Ordinary share capital	Paid in	R0010	5,000	5,000				
	Called up but not yet paid in	R0020						
	Own shares held	R0030						
<b>Total ordinary share capital</b>			<b>5,000</b>	<b>5,000</b>				
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual type undertakings	Paid in	R0110						
	Called up but not yet paid in	R0120						
<b>Total initial fund members' contributions or the equivalent basic own fund item for mutual and mutual type undertakings</b>								
Subordinated mutual members accounts	Dated subordinated	R0210						
	Undated subordinated with a call option	R0220						
	Undated subordinated with no contractual opportunity to redeem	R0230						
<b>Total subordinated mutual members accounts</b>								
Preference shares	Dated preference shares	R0310						
	Undated preference shares with a call option	R0320						
	Undated preference shares with no contractual opportunity to redeem	R0330						
<b>Total preference shares</b>								
Subordinated liabilities	Dated subordinated liabilities	R0400						
	Undated subordinated liabilities with a contractual opportunity to redeem	R0420						
	Undated subordinated liabilities with no contractual opportunity to redeem	R0430						
<b>Total subordinated liabilities</b>								
<b>Total subordinated liabilities</b>			<b>R0500</b>					

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**S.25.01.01.01 Basic Solvency Capital Requirement**

Z Axis:, No

		Net solvency capital requirement	Gross solvency capital requirement	Allocation from adjustments due to RFF and Matching adjustments portfolios
		C0030	C0040	C0050
Market risk	R0010	1,098	1,098	
Counterparty default risk	R0020	360	360	
Life underwriting risk	R0030	467	467	
Health underwriting risk	R0040	1,255	1,255	
Non-life underwriting risk	R0050	0	0	
Diversification	R0060	-972	-972	
Intangible asset risk	R0070			
Basic Solvency Capital Requirement	R0100	2,208	2,208	

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**S.25.01.01.02 Calculation of Solvency Capital Requirement**

Z Axis:, No

		Value
		C0100
Adjustment due to RFF/MAP nSCR aggregation	R0120	
Operational risk	R0130	319
Loss-absorbing capacity of technical provisions	R0140	
Loss-absorbing capacity of deferred taxes	R0150	
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	
Solvency Capital Requirement excluding capital add-on	R0200	2,527
Capital add-on already set	R0210	
Solvency capital requirement	R0220	2,527
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
	Method used to calculate the adjustment due to RFF/MAP nSCR aggregation	R0450
	Net future discretionary benefits	R0460

**S.25.01.21.04 Approach to tax rate**

		Yes/No
		C0109
Approach based on average tax rate	R0590	Approach based on average tax rate is not applicable as LAC DT is not used

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**S.25.01.21.05 Calculation of loss absorbing capacity of deferred taxes**

		Solvency II	
		LAC DT	
		C0130	
Loss-absorbing capacity of deferred taxes	LAC DT	R0640	0
	LAC DT justified by reversion of deferred tax liabilities	R0650	0
	LAC DT justified by reference to probable future taxable economic profit	R0660	0
	LAC DT justified by carry back, current year	R0670	0
	LAC DT justified by carry back, future years	R0680	0
	Maximum LAC DT	R0690	0

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**S.28.01.01.03 Linear formula component for life insurance and reinsurance obligations**

C0040			
Solvency II	MCRL Result	R0200	627

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**S.28.01.01.04 Total capital at risk for all life (re)insurance obligations**

Z Axis:

			Net (of reinsurance/SPV) best estimate and TP calculated as a whole C0050	Net (of reinsurance/SPV) total capital at risk C0060
Amount calculated based on obligations	Obligations with profit participation - guaranteed benefits	R0210		
	Obligations with profit participation - future discretionary benefits	R0220		
	Index-linked and unit-linked insurance obligations	R0230		
	Other life (re)insurance and health (re)insurance obligations	R0240	3,911	
	<b>Total capital at risk for all life (re)insurance obligations</b>	<b>R0250</b>		

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**S.28.01.01.05 Overall MCR calculation**

Z Axis:

C0070

Linear MCR	R0300	627
SCR	R0310	2,527
MCR cap	R0320	1,137
MCR floor	R0330	632
Combined MCR	R0340	632
Absolute floor of the MCR	R0350	3,700
Minimum Capital Requirement	R0400	3,700