

# SOLVENCY AND FINANCIAL CONDITION REPORT **2022**

**OF VIENNA INSURANCE GROUP AG**

**WIENER VERSICHERUNG GRUPPE**

(VIG HOLDING - SOLO COMPANY)

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## SUMMARY

This solvency and financial condition report (SFCR) has been prepared based on the EU Directive 2009/138/EC and Delegated Regulation (EU) 2015/35. The structure of the report follows these statutory and regulatory requirements and deals with the financial year 2022. All monetary amounts in the report are presented in thousands of euro (TEUR/EUR '000) in accordance with the Implementing Regulation 2015/2452. Calculations, however, are done using exact amounts, including digits not shown, which may lead to rounding differences.

VIENNA INSURANCE GROUP AG Wiener Versicherung Gruppe (VIG Holding) is together with its individual companies the leading insurance group in Austria and the CEE region. This SFCR reports on the solvency and financial condition of VIG Holding as a solo company in accordance with the legal requirements. The regulatory solvency and financial situation report for VIG Insurance Group is also available on the VIG Holding website ([www.vig.com](http://www.vig.com)).

Wiener Städtische Wechselseitiger Versicherungsverein – Vermögensverwaltung – Vienna Insurance Group (WSTW) is the main shareholder of Vienna Insurance Group AG Wiener Versicherung Gruppe with a share of 70%.

The structure of the report follows the requirements of Delegated Regulation (EU) 2015/35 and is divided into Chapters A to E with the prescribed subsections.

**Chapter A** presents the business activities and performance of VIG Holding. VIG Holding's main activity is managing its insurance companies. VIG Holding also operates as an insurer and reinsurer, dealing with the international corporate and large customer business and mainly acting as an international reinsurance company for its subsidiaries.

In 2022, VIG Holding's activities as an insurer and reinsurer generated a premium volume after reinsurance of TEUR 1,356,823 (2021: TEUR 1,178,623). The underwriting result in accordance with UGB/VAG was TEUR 48,124 (2021: TEUR 14,047). VIG Holding's combined ratio net of reinsurance was 98.7% in 2022 (2021: 99.6%).

In the interests of forward-looking capital management, VIG Holding placed a TEUR 500,000 Tier 2 subordinated bond on 8 June 2022. Around 43% (TEUR 215,600) of the subordinated bond from 2013 was repurchased at the same time. The outstanding amount of this bond of TEUR 284,400 is callable in October 2023.

The closing of the purchase agreement concluded on 29 November 2020 for VIG Holding's acquisition of the companies of the Dutch company Aegon N.V. in Hungary, Poland, Romania and Türkiye has already been partially implemented. VIG Holding finalised the acquisition of the Hungarian Aegon companies in March 2022. As a result, Hungarian state-owned holding company Corvinus acquired a 45% interest in AEGON Hungary. In April 2022, the acquisition of the Turkish Aegon insurance company was successfully completed. The closing of the Aegon companies acquisition in Poland and Romania is expected to take place in 2023, once the outstanding approvals have been granted by the authorities.

Acquisition of the AEGON companies in Hungary in March 2022 made VIG and its companies there the market leader in the Hungarian market. VIG shares were listed on the Budapest Stock Exchange in November 2022 so that its status as the largest insurance group could also be used for the capital market and to further increase its visibility and liquidity.

In April 2022, VIG Holding continued the expansion of its range of digital customer service companies and founded Global Assistance Serbia. That means the VIG Group now has eight assistance companies of its own that provide customer support and service in eleven countries.

International Finance Corporation (IFC), a member of the World Bank Group, acquired an interest of around 10% in the Bulgarian pension fund Doverie in December 2022, in which VIG now holds an interest of around 83%. The pension fund has been the market-leading pension fund in Bulgaria for 15 years and has a market share of 25%. As of mid-2022, around TEUR 2,300,000 from around 1.2 million customers was being managed.

The Slovakian insurance company Kooperativa poisťovňa, a member of the VIG Group, acquired all the shares of the Slovakian pension fund company 365.life d.s.s. from 365.bank at the end of December 2022, thereby expanding its

range of services to include company pension plans. 365.life has a market share of around 5% in Slovakia and manages pension funds with a total volume of more than TEUR 500,000 from around 125,000 customers.

**Chapter B** describes the governance system of VIG Holding, and presents the Supervisory Board members and their duties, the responsibilities of the Managing Board members, the committees that have been established and the governance and other key functions.

After presenting the compensation policy and fit and proper requirements, the risk management system (including the risk management function), Own Risk and Solvency Assessment (ORSA), internal control system (including the compliance function), internal audit function and actuarial function are also described. Finally, the measures implemented by the company in the area of outsourcing and the critical and important functions and activities outsourced by VIG Holding are described and listed.

The VIG Holding governance system includes all the processes needed to effectively and efficiently manage and supervise the company and is appropriate with respect to the nature, size and complexity of the company. Except for changes in the members of the Supervisory Board, no significant changes took place in the VIG Holding governance system.

**Chapter C** describes the VIG Holding risk profile. As the parent company of the international VIG Insurance Group, its risk profile is dominated by investment and currency risks. These risks are of a strategic nature and are consciously accepted. Due to its activities as an insurer and reinsurer, VIG Holding is also exposed to a minor amount of underwriting risk, which is handled using effective risk management. The table below provides an overview of VIG Holding's material risks based on the partial internal model (PIM), which is also used for risk measurement to determine the regulatory solvency position.

<b>Risks based on the PIM</b>	<b>31 December 2022</b>	<b>31 December 2021</b>
<i>in EUR '000</i>		
Market risk	2,463,444	2,339,828
Counterparty default risk	127,910	121,593
Life underwriting risk	5,044	2,090
Health underwriting risk	47,301	42,648
Non-life underwriting risk	285,720	206,565
Intangible asset risk	0	0
Operational risk	46,872	43,146

Other risks not included in the solvency calculation are qualitatively assessed as part of the risk management process. With respect to qualitative risk assessment, due to its primary business activity of managing the individual companies, only strategic risk is significant for VIG Holding. Liquidity risk and reputation risk are considered low for VIG Holding.

**Chapter D** describes the valuation for solvency purposes, which is primarily governed by the European Framework Directive (2009/138/EC) and the Delegated Regulation (EU) 2015/35. The underlying principle thereof is the evaluation of the economic situation of an undertaking on the basis of current market prices. The items of the economic balance sheet are described, along with their quantitative and qualitative valuation differences (between market valuation and the values presented in the annual financial statements prepared in accordance with UGB/VAG). There were no significant changes in the valuation used for the economic balance sheet during the reporting period.

**Chapter E** discusses VIG Holding's capital management. As of 31 December 2022, VIG Holding had a solvency capital requirement (SCR) of TEUR 2,535,818 and a minimum capital requirement (MCR) of TEUR 633,955 based on the partial internal model. The value of eligible own funds covering the SCR is equal to TEUR 10,567,377 while the value of eligible own funds covering the MCR is equal to TEUR 9,426,259. As a result, VIG Holding has recorded a solvency ratio of 416.7% and an MCR coverage ratio of 1,486.9%.

<b>Solvency capital requirement and its coverage for VIG Holding based on PIM</b>	<b>31 December 2022</b>	<b>31 December 2021</b>
<i>in EUR '000</i>		
<b>Solvency II own funds to meet the SCR</b>	<b>10,567,377</b>	<b>9,987,236</b>
Tier 1	9,299,468	8,825,802
Tier 2	1,267,909	1,161,435
Tier 3	0	0
<b>Solvency capital requirement (SCR)</b>	<b>2,535,818</b>	<b>2,403,963</b>
<b>Solvency ratio</b>	<b>416.7%</b>	<b>415.4%</b>

<b>Minimum capital requirement and its coverage for VIG Holding based on PIM</b>	<b>31 December 2022</b>	<b>31 December 2021</b>
<i>in EUR '000</i>		
<b>Solvency II own funds to meet the MCR</b>	<b>9,426,259</b>	<b>8,946,000</b>
Tier 1	9,299,468	8,825,802
Tier 2	126,791	120,198
Tier 3	0	0
<b>Minimum capital requirement (MCR)</b>	<b>633,955</b>	<b>600,991</b>
<b>MCR coverage ratio</b>	<b>1,486.9%</b>	<b>1488.5%</b>

No voluntary transitional measures were used when determining the solvency position. VIG Holding's solvency ratio rose slightly in financial year 2022. This change was mainly due to the performance of participations in insurance companies and the issue of the Tier 2 subordinated bond. The MCR coverage ratio remains at a very high level.

## DECLARATION BY THE MANAGING BOARD

We confirm to the best of our knowledge that the Solvency and Financial Condition Report of VIENNA INSURANCE GROUP AG Wiener Versicherung Gruppe, which has been prepared in accordance with the provisions of the Austrian Insurance Supervision Act and corresponding directly applicable rules at the European level, gives a true picture of the solvency and financial condition of the company and that it describes the business development, governance system, risk profile and assets, liabilities, and own funds of the solvency balance sheet.

Vienna, 27 March 2023

The Managing Board:



**Elisabeth Stadler**  
General Manager (CEO),  
Chairwoman of the Managing Board



**Hartwig Löger**  
Member of the Managing Board (Deputy General  
Manager, Deputy Chairman of the Managing  
Board)



**Liane Hirner**  
Member of the Managing Board (CFRO)



**Peter Höfinger**  
Member of the Managing Board



**Gerhard Lahner**  
Member of the Managing Board (COO)



**Gábor Lehel**  
Member of the Managing Board (CIO)



**Harald Riener**  
Member of the Managing Board



**Peter Thirring**  
Member of the Managing Board (CTO)

## A BUSINESS AND PERFORMANCE

This report contains all information required by law regarding the solvency and financial condition of VIG Holding:

### VIENNA INSURANCE GROUP AG Wiener Versicherung Gruppe

Stock corporation with its registered office at Schottenring 30, 1010 Vienna, registered with the Vienna Commercial Court under FN 75687 f

Tel: +43 (0) 50 390-22000

[www.vig.com](http://www.vig.com)

Important information regarding the solvency and financial condition of VIG Holding is communicated to the public to ensure transparency.

The competent supervisory authority for the company and VIG Insurance Group is the

### Austrian Financial Market Authority (FMA)

Otto-Wagner-Platz 5, 1090 Vienna

Tel: +43 (1) 249 59-0

[www.fma.gv.at](http://www.fma.gv.at)

The audit of the accuracy of this report and the information contained therein was performed by

### KPMG Austria GmbH Wirtschaftsprüfungs- und Steuerberatungsgesellschaft

Porzellangasse 51, 1090 Vienna

Tel: +43 (1) 31332-0

[www.kpmg.at](http://www.kpmg.at)

## A.1 BUSINESS

VIG Insurance Group is an international insurance group headquartered in Vienna. VIG Insurance Group stands for stability and expertise in providing financial protection against risks. The roots of the Group reach back to the year 1824. Almost 200 years of experience and a focus on the core competence of providing insurance represent a solid and secure foundation for the around 28 million customers of VIG Insurance Group.

As early as 1990, the former Wiener Städtische Versicherung AG created the foundations for a successful expansion into Central and Eastern Europe (CEE). The reorganisation in 2010 of the holding company VIENNA INSURANCE GROUP AG Wiener Versicherung Gruppe, headquartered in Vienna, was the result of the expansion actively pursued by VIG Insurance Group over the past two decades. Around 300 VIG Holding employees were assisting the Managing Board with managing and steering the participations in insurance companies<sup>1</sup> at the end of 2022. VIG Holding also operates directly in the corporate and large customer business and in reinsurance.

The VIG insurance companies are primarily managed and monitored by their respective Supervisory Boards, in which members of the Managing Board of VIG Holding are always represented. Group-wide guidelines and policies are defined in the management areas of VIG Holding to assist with the management of participations in insurance companies and are also used in VIG Holding as a separate company. The management areas include Planning and Controlling, Strategy and Development, Asset Management (incl. Real Estate), Reinsurance, Compliance, Enterprise Risk Management, Internal Audit, Actuarial Department, VIG Corporate IT, Holding IT, Finance Department, Process & Project Management and Human Resources.

In addition to the responsibility for managing its participations in insurance companies, VIG Holding's area of activities also includes cross-border corporate and international reinsurance business.

In the area of reinsurance, VIG Holding manages and assists its subsidiaries with all the reinsurance matters. Pooling different risks ensures an effective balancing of risks at the VIG Insurance Group level that in turn ensures optimal external reinsurance protection for VIG Insurance Group as a whole. The primary goal is to create a safety net. This is intended to provide continuous protection for all of the companies in VIG Insurance Group against the negative effects of large losses and negative changes in the insurance portfolios.

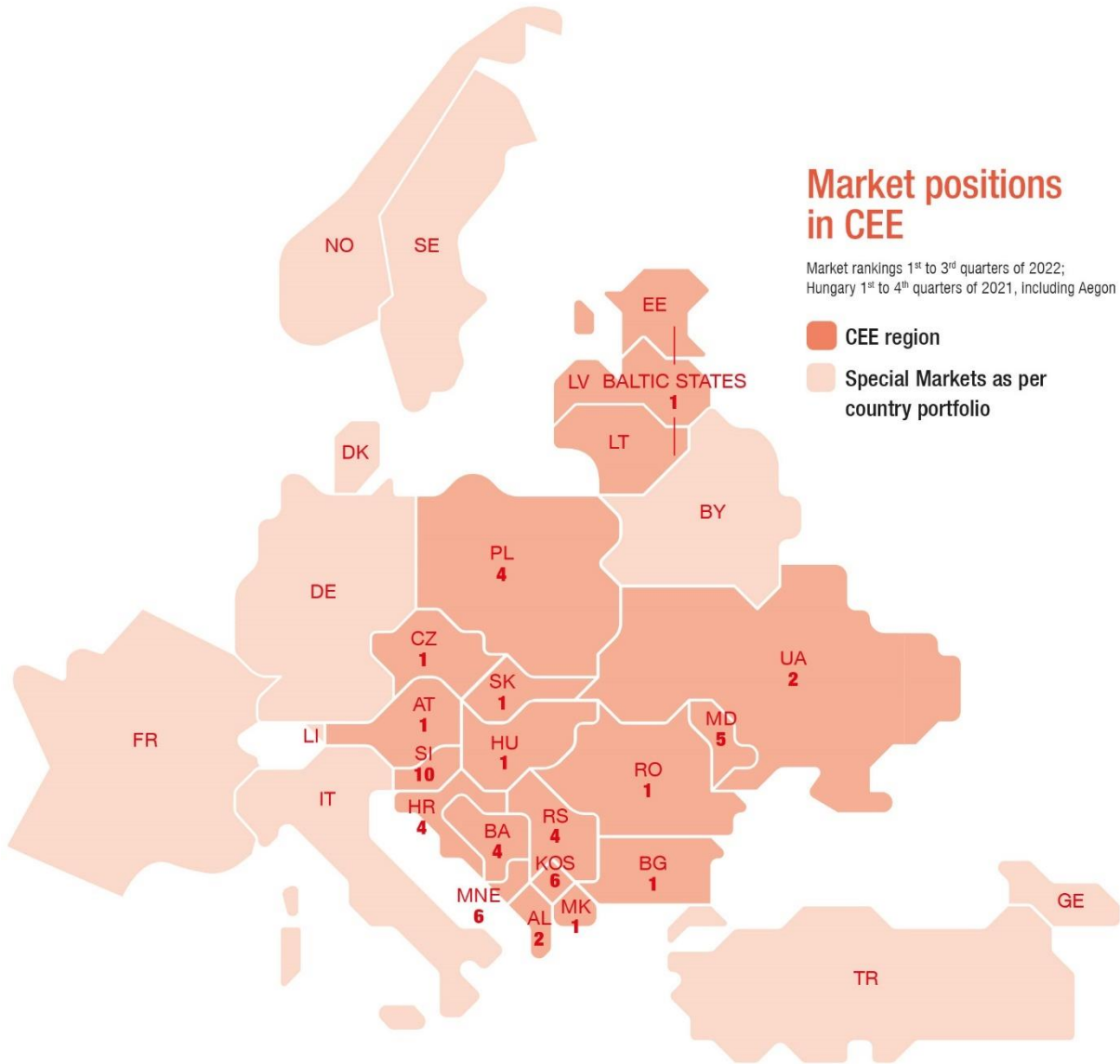
VIG Holding also bundles together and coordinates large customer business that extends outside the borders of Austria. Custom-tailored professional insurance solutions are particularly important for international corporate customers. For this reason, VIG Holding has established a separate insurance platform, Vienna International Underwriters (VIU), especially for business customers. Its extensive network offers professional tailor-made international customer support in this area by experts in Austria and the entire CEE region.

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<sup>1</sup> A list of all Group companies, including their names, legal forms, countries and shareholdings can be found in the QRT S.32.01.22 in the annex to this report.



The following charts show a simplified Group structure of the VIG insurance companies.



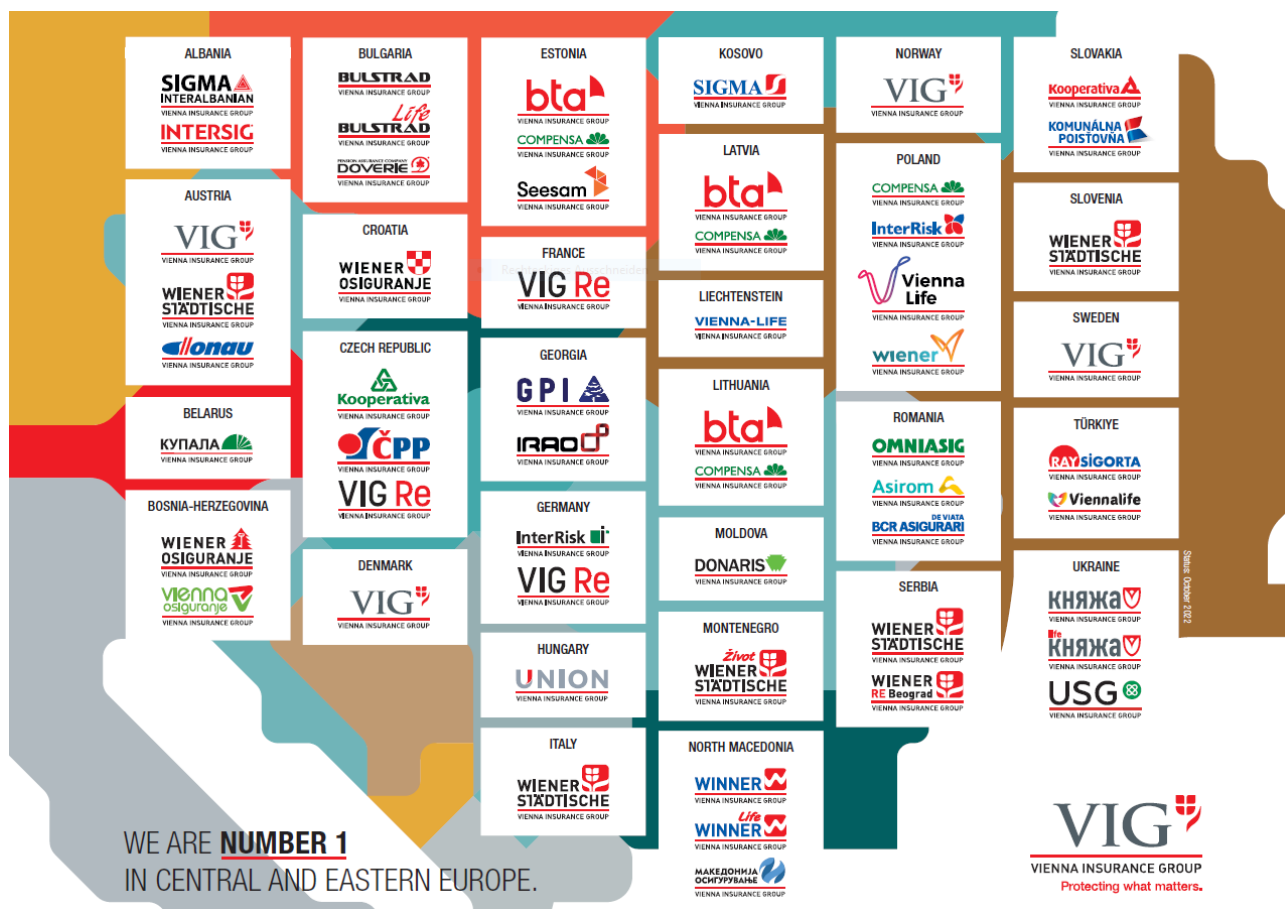


Chart as at January 2023

## OWNERSHIP STRUCTURE

The main shareholder of VIG Holding is Wiener Städtische Wechselseitiger Versicherungsverein - Vermögensverwaltung - Vienna Insurance Group (a mutual insurance company headquartered at Schottenring 30, 1010 Vienna), which holds around 72% of the shares (directly and indirectly). The remaining shares of approximately 28% are in free float.

## SIGNIFICANT BUSINESS EVENTS

### PLACEMENT OF A TIER 2 SUBORDINATED BOND

In the interests of forward-looking capital management, VIG Holding placed a EUR 500 million Tier 2 subordinated bond in a challenging capital market environment on 8 June 2022. The subordinated bond has a term of 20 years and VIG Holding can call it for the first time after 10 years. The bonds initially have an annual fixed interest rate of 4.875% and are listed on the Vienna Stock Exchange. Around 43% (TEUR 215,600) of the subordinated bond from 2013 was repurchased at the same time. The outstanding amount of this bond amounting to TEUR 284,400 is callable in October 2023.

### ACQUISITION OF AEGON CEE

The closing of the purchase agreement was concluded on 29 November 2020 for the VIG Group acquisition of the companies of the Dutch company Aegon N.V. in Hungary, Poland, Romania and Türkiye has already been partially implemented. The VIG Group finalised the acquisition of the Hungarian Aegon companies in March 2022. Consequently, the Hungarian state holding Corvinus holds a 45% stake in Aegon Hungary. In April 2022, the acquisition of the Turkish Aegon insurance company was successfully completed. The closing of the Aegon companies in Poland

and Romania are provisionally expected to be completed take place in 2023, once the outstanding approvals have been granted by the authorities.

#### **GLOBAL ASSISTANCE SERBIA FORMED**

In April 2022, VIG Holding continued the expansion of its range of digital customer service companies and founded Global Assistance Serbia. That means the VIG Group now has eight assistance companies of its own that provide customer support and service in eleven countries.

#### **PENSION FUNDS**

International Finance Corporation (IFC), a member of the World Bank Group, acquired an interest of around 10% in the Bulgarian pension fund Doverie in December 2022, in which VIG now holds an interest of around 83%. The pension fund has been the market-leading pension fund in Bulgaria for 15 years and has a market share of 25%. As of mid-2022, around TEUR 2,300,000 from around 1.2 million customers were being managed.

The Slovakian insurance company Kooperativa poisťovňa, a member of the VIG Group, acquired all the shares of the Slovakian pension fund company 365.life d.s.s. from 365.bank at the end of December 2022, thereby expanding its range of services to include company pension plans. 365.life has a market share of around 5% in Slovakia and manages pension funds with a total volume of more than TEUR 500,000 from around 125,000 customers.

#### **LISTING ON THE BUDAPEST STOCK EXCHANGE**

Acquisition of the AEGON companies in Hungary in March 2022 made VIG, together with the already existing VIG company Union, the market leader in Hungary. VIG shares were listed on the Budapest Stock Exchange in November 2022 so that its status as the largest insurance group could also be used for the capital market and to further increase its visibility and liquidity.

#### **WAR SITUATION IN UKRAINE**

The war between the Russian Federation and Ukraine began on 24 February 2022 when Russian forces invaded Ukraine. The VIG Insurance Group operates in Ukraine with three insurance companies, which are mainly in the western regions of the country, so business operations have thus far only been directly impacted to a moderate extent. Further development of the conflict and the potential for further escalation of sanctions and countermeasures could further worsen the implications for financial markets and the economy in general. A number of risks may materialise for the VIG Insurance Group as a result; these are being addressed and handled as part of our sustainable risk management.

#### **SIGNIFICANT EVENTS AFTER THE BALANCE SHEET DATE**

No events of special significance that would have changed the presentation of the net assets, financial position and results of operations occurred after the balance sheet date.

## A.2 UNDERWRITING PERFORMANCE

### UNDERWRITING PERFORMANCE IN SIGNIFICANT LINES OF BUSINESS

VIG Holding generated a total premium volume before reinsurance of TEUR 1,499,318 during the financial year 2022 (2021: TEUR 1,284,891). Premiums written after reinsurance were TEUR 1,356,823 (2021: TEUR 1,178,623) and TEUR 1,305,496 after adjusting for unearned premiums (2021: TEUR 1,139,671). The predominant share of the premium volume is attributable to indirect business. The result from indirect business was TEUR 51,883 (2021: TEUR 13,139). The net earned premiums of TEUR 1,206,720 (2021: TEUR 1,068,386) from indirect business were included immediately in the income statement. The underwriting result in accordance with UGB/VAG was TEUR 48,124 (2021: TEUR 14,047). The combined ratio is a key figure used in property and casualty insurance and defined as the ratio of administrative expenses and claim payments to net earned premiums. VIG Holding had a ratio of 98.7% in 2022 (2021: 99.6%) (less reinsurers' share), which is close to the previous year's value and less than 100%.

The following tables show the main results after reinsurance (excluding investment income) by line of business for non-life insurance as well as the premiums and expenses for the most important countries. Healthcare expense policies from accepted reinsurance business were shown under non-life insurance during the financial year.

<b>Underwriting performance, non-life insurance 2022</b>	Healthcare expense insurance	Income protection insurance	Motor third party liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other property lines of business	General third party liability insurance	<b>Total</b>
in EUR '000								
Premiums written	21,484	331,748	869,351	0	4,004	112,192	1,870	<b>1,340,649</b>
Net earned premiums	19,147	332,278	829,308	0	3,642	103,347	1,601	<b>1,289,321</b>
Expenses for claims and insurance benefits*	-16,896	-145,088	-568,788	3	-1,446	-89,377	-338	<b>-821,931</b>
Changes to other technical provisions	0	0	0	0	0	-1,049	0	<b>-1,049</b>
Other costs	-5,381	-201,332	-319,054	-4	-1,425	-20,331	-200	<b>-547,726</b>

\* Excluding cost items

<b>Underwriting performance, non-life insurance 2021</b>	Income protection insurance	Motor third party liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other property lines of business	General third party liability insurance	<b>Total</b>
in EUR '000							
Premiums written	315,270	753,925	0	1,819	85,505	1,331	<b>1,157,851</b>
Net earned premiums	313,354	725,485	0	1,911	77,127	1,021	<b>1,118,899</b>
Expenses for claims and insurance benefits*	-120,982	-481,169	22	-1,341	-62,641	-315	<b>-666,427</b>
Changes to other technical provisions	0	0	0	0	-623	0	<b>-623</b>
Other costs	-202,457	-342,420	0	-893	-17,284	-653	<b>-563,708</b>

\* Excluding cost items

**Premiums and expenses for the most important countries (2022)**

	Austria	Czech Republic	Germany	Poland	Romania	Slovakia
in EUR '000						
Premiums written	332,854	312,146	87,086	198,790	104,954	85,335
Net earned premiums	332,552	300,365	85,664	195,370	96,912	83,752
Expenses for claims and insurance benefits*	-224,220	-134,068	-98,039	-124,486	-79,392	-53,368

\* Excluding cost items

**Premiums and expenses for the most important countries (2021)**

	Austria	Czech Republic	Germany	Poland	Romania	Slovakia
in EUR '000						
Premiums written	361,174	278,134	47,523	194,626	59,071	81,246
Net earned premiums	354,259	274,955	45,214	189,372	45,521	79,891
Expenses for claims and insurance benefits*	-222,100	-84,503	-129,302	-104,460	-40,703	-45,929

\* Excluding cost items

A detailed review of the underwriting performance is presented in the attachment QRT S 05.01.02.

In addition to assumed property and casualty insurance, the indirect business has also included health and life insurance business since financial year 2021.

The following tables show the values after reinsurance for the most important life and health insurance lines of business as well as the premiums and expenses for the most important countries:

**Underwriting performance**
**Life insurance and health insurance 2022**

	Health insurance	Insurance with profit participation	Index-linked and unit-linked insurance	Other life insurance	Health indirect business	Life indirect business	Total
in EUR '000							
Premiums written	0	0	0	0	0	16,174	16,174
Net earned premiums	0	0	0	0	0	16,174	16,174
Expenses for claims and insurance benefits*	0	0	0	0	0	-3,239	-3,239
Changes to other technical provisions	0	0	0	0	0	-13,752	-13,752
Other costs	0	0	0	0	0	-327	-327

\* Excluding cost items

**Underwriting performance, life and health insurance 2021**

	Health insurance	Insurance with profit participation	Index-linked and unit-linked insurance	Other life insurance	Health indirect business	Life indirect business	Total
in EUR '000							
Premiums written	0	0	0	0	15,639	5,133	20,772
Net earned premiums	0	0	0	0	15,639	5,133	20,772
Expenses for claims and insurance benefits*	0	0	0	0	-12,808	0	-12,808
Changes to other technical provisions	0	0	0	0	0	-5,145	-5,145
Other costs	0	0	0	0	-2,689	-27	-2,716

\* Excluding cost items

The values shown under "health indirect business" in financial year 2021 (2021: TEUR 15,639) were shown with a value of TEUR 21,484 under non-life insurance in financial year 2022 due to their short-term nature.

TEUR 16,174 in premiums were written for life insurance (2021: TEUR 5,133). As shown in the tables, these premiums and expenses mainly concern Romania:

<b>Premiums and expenses for the most important countries (2022)</b>	Romania
in EUR '000	
Premiums written	16,174
Net earned premiums	16,174
Expenses for claims and insurance benefits*	-430

\* Excluding cost items

<b>Premiums and expenses for the most important countries (2021)</b>	Romania
in EUR '000	
Premiums written	5,133
Net earned premiums	5,133
Expenses for claims and insurance benefits*	0

\* Excluding cost items

### A.3 INVESTMENT PERFORMANCE

VIG Holding takes into account the overall risk position of the company when making investments in fixed-interest securities, real estate, participations, loans and shares. When determining the volumes and limiting the open transactions, the risks associated with investments have to be taken into consideration.

In 2022, VIG Holding recorded the investment income and expenses as shown in the following table.

<b>Income and expenses for investments in 2022</b>	Dividends	Interest	Rent	Net profit and loss	Unrealised profits and losses
in EUR '000					
<b>Investments</b>	<b>411,036</b>	<b>33,490</b>	<b>13,729</b>	<b>-26,754</b>	<b>-104,889</b>
Property	0	0	13,729	955	43,198
Shares and participations	411,014	0	0	0	0
Government bonds	0	1,538	0	0	-17,950
Corporate bonds	0	23,478	0	-160	-126,260
Loans and mortgages	0	5,055	0	-531	-2,265
Collective investments undertakings	21	0	0	-15,957	73
Derivatives	0	0	0	-11,062	-1,685
Cash and cash equivalents	0	3,418	0	0	0

<b>Income and expenses for investments in 2021</b>	Dividends	Interest	Rent	Net profit and loss	Unrealised profits and losses
in EUR '000					
<b>Investments</b>	<b>673,843</b>	<b>23,411</b>	<b>12,775</b>	<b>-5,548</b>	<b>17,363</b>
Property	0	0	12,775	361	44,821
Shares and participations	672,188	0	0	0	0
Government bonds	0	810	0	24	-2,041
Corporate bonds	0	21,062	0	-29	-22,022
Loans and mortgages	0	2,318	0	-495	-331
Collective investments undertakings	1,654	0	0	0	-1,280
Derivatives	0	0	0	-5,409	-1,784
Cash and cash equivalents	0	-779	0	0	0

The figures in the tables above are based on valuations performed in accordance with Solvency II, which differ from the results under UGB/VAG due to market values being used for realised profits and losses. Local accounting rules, on the other hand, require book values to be used to calculate realised profits and losses.

There were TEUR 212,885 in write-downs of shares in affiliated companies under UGB/VAG during the financial year (2021: TEUR 105,350).

The interest income from deposits corresponding to indirect business was transferred to the underwriting account.

There are no securitisation exposures within the VIG Holding portfolio.

Since the UGB/VAG balance sheet does not include any gains or losses directly recognised in equity, no disclosure can be provided in this respect.

#### A.4 PERFORMANCE OF OTHER ACTIVITIES

There was no significant other income or expenses in the financial year 2022.

The following disclosures are provided for off-balance sheet contingent liabilities: There are letters of comfort and declarations of liability totalling TEUR 470,419 (2021: TEUR 425,000), including TEUR 75,000 in connection with borrowing by and a letter of comfort for an affiliated company. In 2022, VIG Holding gave a commitment to the subsidiary VIG Re to provide capital to increase its ancillary own funds by TEUR 22,000. The capital is available for drawing until 31/12/2029 at the latest. The Austrian Financial Market Authority provided its approval on 15/12/2022. VIG Holding gave another commitment to its largest subsidiary WIENER STÄDTISCHE Versicherung AG, Vienna Insurance Group in 2019 to provide capital to increase its ancillary own funds by TEUR 350,000, which can be drawn down if necessary by 31/12/2029 at the latest. The Austrian Financial Market Authority provided its approval on 23/12/2019. VIG Holding issued a letter of comfort for TEUR 75,000 for its wholly owned subsidiary Central Point GmbH in 2020. A put option was included in ATBIH's sale of Doverie shares to IFC (transfer of the shares took place on 29/12/2022) under which both ATBIH and VIG give IFC the right to sell back the shares held during the period from the 6<sup>th</sup> anniversary of the transfer (29/12/2028) to the 10<sup>th</sup> anniversary. The fair value of the contingent liability arising from this option is TEUR 23,419.

VIG Holding has no significant lease agreements.

#### A.5 ANY OTHER INFORMATION

There is no other significant information on business activities and performance to be reported in the year under review.

## B SYSTEM OF GOVERNANCE

Governance refers to all the processes related to the management as well as the effective and efficient monitoring of the company. The governance system considers not only the internal organisation, structure and mechanisms within the company, but also its legal and factual integration into the external (market) environment.

The VIG Holding Managing Board is responsible for the compliance with the requirements applicable to VIG Holding and with the recognised principles of proper business operation.

VIG Holding has set up an efficient governance system tailored to the company's needs and requirements, enabling a sound and prudent management. In addition to the establishment of the governance and other key functions, all other relevant processes have also been set up to identify, measure, monitor, manage and report risks, taking their interdependencies into account.

The internal processes ensure that the analyses of the governance and other key functions and all results of the risk management processes are appropriately taken into account during the course of business activities.

VIG Holding has a governance system with the following characteristics:

- Functional management of the company by the Managing Board
- Transparent monitoring by the Supervisory Board
- Targeted management decisions towards long-term value creation
- Goal oriented collaboration ensuring the company's management and monitoring
- Appropriate handling and management of risks
- Transparency in corporate communications and efficient reporting
- Safeguarding the policy holders', shareholders' and employees' interests

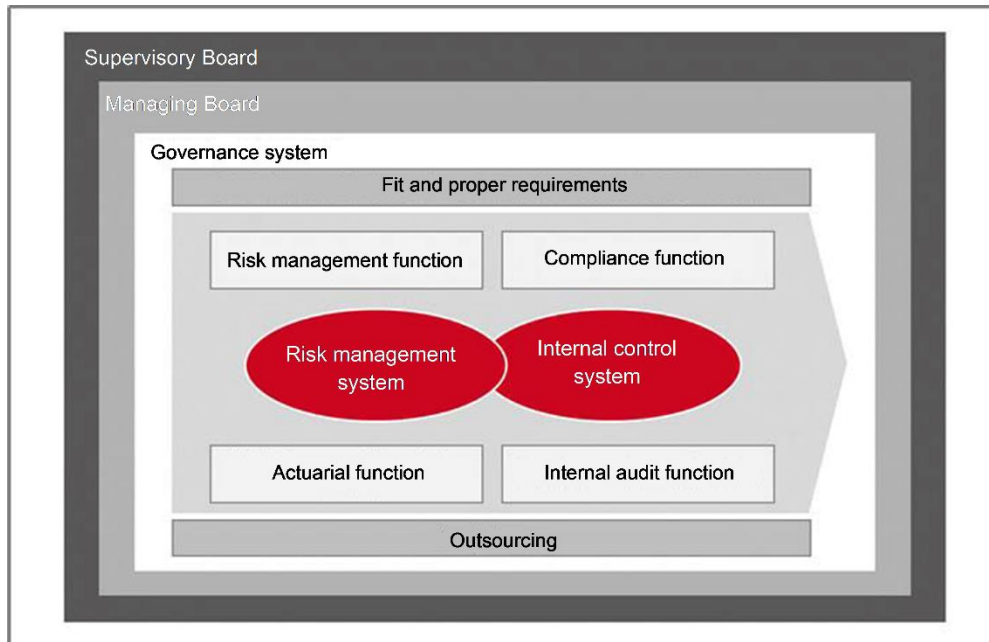
The following section describes:

- General information on the system of governance
- Fit and proper requirements
- Risk management system including the own risk and solvency assessment
- Internal control system
- Internal audit function
- Actuarial function
- Outsourcing



## B.1 GENERAL INFORMATION ON THE SYSTEM OF GOVERNANCE

VIG Holding's governance system covers all areas and decision-making bodies involved in the risk management processes.



It includes the following elements:

- Fit and proper requirements for management
- Governance and other key functions
- Risk management system
- Internal control system
- Provisions on outsourcing

The elements listed above, the main duties and responsibilities of the Supervisory Board and Managing Board, which are also part of the governance system, compensation policies and practices as well as decision-making and reporting mechanisms are explained below.

## B.1.1 MANAGEMENT AND SUPERVISORY BODIES

### B.1.1.1 SUPERVISORY BOARD

The Supervisory Board and its committees, Chairperson and Deputy Chairpersons periodically and repeatedly monitored in detail the management of the company and the activities of the Managing Board in connection with its management and steering duties. Extensive presentations and discussions during Supervisory Board meetings and committee meetings were used for this purpose, and, in some cases, in-depth discussions took place with the members of the Managing Board, who provided detailed explanations and supporting documentation relating to the management and financial condition of VIG Holding and VIG Insurance Group. Among other things, the strategy, business development (overall and in individual regions), risk management, internal control system, internal audit, compliance function and actuarial function activities and reinsurance, both at the VIG Holding and Group level, and other important topics for VIG Holding and VIG Insurance Group were discussed during these meetings.

The VIG Holding Supervisory Board consists of twelve people and had the following members as of 31 December 2022:

Name	Function	Date first appointed	End of current term of office
Günter Geyer	Chairman	2014	2024
Rudolf Ertl	1 <sup>st</sup> Deputy Chairman	2014	2024
Robert Lasshofer	2 <sup>nd</sup> Deputy Chairman	2021	2024
Martina Dobringer	Member	2011	2024
Zsuzsanna Eifert	Member	2021	2024
Gerhard Fabisch	Member	2017	2024
András Kozma	Member	2022	2024
Peter Mihók	Member	2019	2024
Heinz Öhler	Member	2002	2024
Gabriele Semmelrock-Werzer	Member	2017	2024
Katarína Slezáková	Member	2020	2024
Gertrude Tumpel-Gugerell	Member	2012	2024

### CHANGES DURING THE FINANCIAL YEAR

Georg Riedl stepped down from his position on the Supervisory Board with effect from the end of the Annual General Meeting. András Kozma was elected as a new member of the Supervisory Board at the Annual General Meeting on 20 May 2022.

## SUPERVISORY BOARD COMMITTEES

The Supervisory Board has set up five committees from among its members in order to best meet its obligations in accordance with statutory provisions and the VIG Holding articles of association:

- Committee for Urgent Matters (Working Committee)
- Audit Committee (Accounts Committee)
- Committee for Managing Board Matters (Personnel Committee)
- Strategy Committee
- Nomination Committee

### COMMITTEE FOR URGENT MATTERS (WORKING COMMITTEE)

The Committee for Urgent Matters (Working Committee) decides on matters that require an approval of the Supervisory Board, but cannot be deferred to the next ordinary Supervisory Board meeting because of particular urgency.

#### Members

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Günter Geyer (Chairman)  
 Rudolf Ertl  
 Robert Lasshofer

#### Substitute

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Substitute: Gertrude Tumpel-Gugerell  
 Substitute: Martina Dobringer  
 Substitute: Gerhard Fabisch

### AUDIT COMMITTEE (ACCOUNTS COMMITTEE)

The Audit Committee (Accounts Committee) performs the duties assigned to it by law and is responsible in particular for the duties assigned by § 92 (4a) no. 4 of the Austrian Stock Corporation Act (AktG), § 123 (9) of the Austrian Insurance Supervision Act (VAG) and Regulation (EU) No. 537/2014.

Members of the Audit Committee are experienced financial experts with knowledge and practical experience in finance, accounting and reporting that satisfy the requirements of the Company.

The Audit Committee (Accounts Committee) has the following members:

#### Members

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Gertrude Tumpel-Gugerell (Chairwoman)  
 Martina Dobringer (Deputy Chairwoman)  
 Zsuzsanna Eifert  
 Rudolf Ertl  
 Günter Geyer  
 András Kozma  
 Robert Lasshofer  
 Peter Mihók  
 Katarína Slezáková

If a member is unable to attend, Gabriele Semmelrock-Werzer will attend the meeting, and if she is also unable to attend, Heinz Öhler will attend. If Gertrude Tumpel-Gugerell is unable to attend, the meeting will be chaired by Martina Dobringer.

### COMMITTEE FOR MANAGING BOARD MATTERS (PERSONNEL COMMITTEE)

The Committee for Managing Board Matters (Personnel Committee) deals with personnel matters of the Managing Board. The Committee for Managing Board Matters therefore decides on employment contract terms with Members of the Managing Board and their remuneration and examines remuneration policies at regular intervals.

The Committee for Managing Board Matters (Personnel Committee) has the following members:

**Members**

Günter Geyer (Chairman)
Rudolf Ertl
Robert Lasshofer

**STRATEGY COMMITTEE**

The Strategy Committee cooperates with the Managing Board and, when appropriate, with experts whom it consults to prepare fundamental decisions that must then be decided on by the Supervisory Board as a whole.

The Strategy Committee has the following members:

**Members**

**Substitute**

Günter Geyer (Chairman)	Substitute: Gertrude Tumpel-Gugerell
Zsuzsanna Eifert	Substitute: Gabriele Semmelrock-Werzer
Rudolf Ertl	Substitute: Martina Dobringer
András Kozma	Substitute: Heinz Öhler
Robert Lasshofer	Substitute: Gerhard Fabisch
Peter Mihók	Substitute: Katarína Slezáková

**NOMINATION COMMITTEE**

The Nomination Committee submits proposals to the Supervisory Board for filling positions that become available on the Managing Board and handles the successor planning issues.

The Nomination Committee has the following members:

**Members**

Günter Geyer (Chairman)
Martina Dobringer
Rudolf Ertl
Robert Lasshofer

Substitute in the event that a member is unable to attend: Gertrude Tumpel-Gugerell.

### B.1.1.2 MANAGING BOARD

The Managing Board manages the business of the Company under the leadership of its Chairperson and within the constraints of the law, articles of association, procedural rules of the Managing Board and procedural rules of the Supervisory Board. The Managing Board meets when needed (generally every two weeks) to discuss current business developments, and makes the necessary decisions and resolutions during the course of these meetings. The members of the Managing Board continuously exchange information with each other and with the heads of various areas.

The Managing Board of VIG Holding had the following eight members as of 31 December 2022:

- Elisabeth Stadler (General Manager (CEO), Chairwoman of the Managing Board)
- Hartwig Löger (Deputy General Manager, Deputy Chairman of the Managing Board)
- Liane Hirner (CFRO)
- Peter Höfingner
- Gerhard Lahner (COO)
- Gábor Lehel (CIO)
- Harald Riener
- Peter Thirring (CTO)

#### Changes during and after the end of the financial year:

The VIG Holding Managing Board will have the following members from 1 July 2023: Hartwig Löger, Chairman of the Managing Board (General Manager), Peter Höfingner, Deputy Chairman of the Managing Board (Deputy General Manager), Liane Hirner (CFRO), Gerhard Lahner (COO), Gábor Lehel (CIO) and Harald Riener. All Managing Board terms will expire on 30 June 2027. Ms Stadler and Mr Thirring will, at their own request, not extend their terms on the Managing Board upon their expiry on 30 June 2023.

Further information on the members of the Managing Board (as of 1 January 2023), including their employment history, is presented below.

#### Elisabeth Stadler

General Manager (CEO), Chairwoman of the Managing Board, born in 1961

Elisabeth Stadler studied actuarial theory at the Vienna Technical University and began her career in the Austrian insurance industry as a Managing Board Member and Chairwoman. In May 2014, she was awarded the professional title of professor by Federal Minister Gabriele Heinisch-Hosek for her merits for the insurance industry. She held the position of General Manager at Donau Versicherung from September 2014 to March 2016, and has been CEO of VIG Holding since 2016.

Areas of responsibility: Management of the VIG Group, Strategy, Bancassurance and International Partnerships, Communications & Marketing, European Affairs and ESG, General Secretariat and Legal, Human Resources, Internal Audit, Sponsoring, Subsidiaries and M&A, Central Functions

Country responsibilities: Germany

Supervisory board positions or comparable positions in other Austrian and foreign companies outside the Group: OMV Aktiengesellschaft, voestalpine AG, Institute of Science and Technology Austria, Austrian Red Cross

### **Hartwig Löger**

Deputy General Manager, Deputy Chairman of the Managing Board, born in 1965

Hartwig Löger began his career in the insurance industry in the brokerage business in 1985. After completing his studies in insurance management at the Vienna University of Economics and Business, he joined Allianz as sales manager in Styria in 1989. From 1997 to 2002, he was head of sales at DONAU Versicherung. This was followed by a number of senior management positions in the UNIQA Group, most recently as CEO of UNIQA Österreich AG until the end of November 2017. Hartwig Löger was the Minister of Finance for Austria from December 2017 to June 2019. He worked for VIG Insurance Group under an advisory agreement with Wiener Städtische Versicherungsverein, the principal shareholder of VIG Holding, from July 2019 to December 2020.

Areas of responsibility: Planning and Controlling, Strategy and Development

Country responsibilities: Austria, Slovakia, Czech Republic, Hungary

### **Liane Hirner**

Member of the Managing Board, CFRO, born in 1968

Liane Hirner studied business administration in Graz. Before joining VIG Insurance Group, she worked at PwC Austria's audit department where she started in 1993, and when she left, Liane Hirner was partner in the insurance area. In addition to her work as an auditor, Liane Hirner has also been involved in many professional associations, such as the IFRS Working Group of the Austrian Insurance Association and the Insurance Working Party of Accountancy Europe in Brussels. Liane Hirner was appointed to the VIG Holding Managing Board on 1 February 2018. She took over the CFO position on 1 July 2018. In 2019, EIOPA appointed Liane Hirner as a new member of the Insurance & Reinsurance Stakeholder Group (IRSG).

Areas of responsibility: Asset Risk Management, Digitalisation, Finance and Risk, Enterprise Risk Management, Finance Department, Investor Relations

Country responsibilities: Liechtenstein

Supervisory board positions or comparable positions in other Austrian and foreign companies outside the Group: Autoneum Holding AG, Winterthur, Switzerland

### **Peter Höfing**

Member of the Managing Board, born in 1971

Peter Höfing studied law at the University of Vienna and University of Louvain-la-Neuve (Belgium). Peter Höfing has been a member of the VIG Holding Managing Board since 1 January 2009. Prior to that, he was a director of the Managing Board at Donau Versicherung, responsible for sales and marketing. He joined this company in 2003. Previously, he held positions as managing board chairman and managing board member outside the Group in Hungary, the Czech Republic and Poland.

Areas of responsibility: Corporate Business, Reinsurance

Country responsibilities: Albania, Bosnia-Herzegovina, Bulgaria, Kosovo, Croatia, Moldova, Montenegro, North Macedonia, Romania, Serbia

### **Gerhard Lahner**

Member of the Managing Board, COO, born in 1977

Gerhard Lahner studied business administration at the Vienna University of Economics and Business and has held a variety of positions for VIG Insurance Group since 2002. He was a member of the Managing Boards of Austrian insurance companies Donau Versicherung and Wiener Städtische and Czech companies Kooperativa and ČPP. Gerhard Lahner was also a substitute member of the VIG Holding Managing Board from 1 January 2019 to 31 December 2019.

Areas of responsibility: Asset Management (incl. Real Estate), Holding IT, Process & Project Management, Treasury incl. Asset Liability Management, VIG Corporate IT

Country responsibilities: Georgia

Supervisory board positions or comparable positions in other Austrian and foreign companies outside the Group: Wien 3420 Aspern Development AG, Wiener Börse AG, Aktienforum

### **Gábor Lehel**

Member of the Managing Board, CIO, born in 1977

Gábor Lehel studied business administration with a major in finance in Tatabánya and Budapest (Hungary). He joined VIG Insurance Group in 2003, where he worked in Controlling and as head of the General Secretariat before being appointed to the Managing Board of the Hungarian insurance company UNION Biztosító in 2008. He was General Manager of UNION Biztosító from mid-2011 to 31 December 2019. From 1 January 2016 to 31 December 2019, he was also a substitute member of the Managing Board of VIG Holding.

Areas of responsibility: Innovation

Country responsibilities: Belarus

### **Harald Riener**

Member of the Managing Board, born in 1969

Harald Riener studied commerce at the Vienna University of Economics and Business and joined VIG Insurance Group in 1998, where he worked in the marketing area for Donau Versicherung and Wiener Städtische until 2001. After working for a media publishing company, he returned in 2006 as Marketing Manager of VIG Holding. He became a member of the Managing Board in Croatia in 2010, and was appointed CEO in 2012. From 2014 to 2019, Harald Riener was a member of the Managing Board of Donau Versicherung where he was responsible for distribution and marketing.

Areas of responsibility: Assistance, Customer Experience, Tool Box Sales

Country responsibilities: Estonia, Latvia, Lithuania, Poland, Ukraine

Supervisory board positions or comparable positions in other Austrian and foreign companies outside the Group: VIG/C-QUADRAT

### **Peter Thirring**

Member of the Managing Board, CTO, born in 1957

Peter Thirring studied law at the University of Vienna. He used his more than 30 years of insurance experience in the Generali insurance group. He was General Manager of Donau Versicherung from March 2016 to the end of June 2018. Peter Thirring was appointed to the VIG Holding Managing Board on 1 July 2018.

Areas of responsibility: Actuarial Department, Active Reinsurance, Anti Money Laundering, Compliance, Insurance Life/Non-Life Retail

Country responsibilities: Türkiye

## B.1.2 COMMITTEES

The Managing Board has set up the following committees for central coordination and effective management of VIG Insurance Group and VIG Holding that help it to best meet its obligations in accordance with the statutory provisions and the VIG Holding articles of association:

- Risk Committee
- Reinsurance Security Committee
- Asset Management meeting/workshop
- Tactical Investment Committee
- Investment meeting
- Liquidity Committee
- Asset-Liability Management Committee
- Compliance Committee

These are briefly presented below.

### RISK COMMITTEE

The Risk Committee was established by the VIG Holding Managing Board to perform regular cross-functional evaluations of the current risk management topics in the organisation specific to the Group and VIG Holding and support the Managing Board in assessing the risk situation.

The members of the committee are designated by the Managing Board and include the key functions in VIG Holding and at least the heads of the areas indicated in section B.3.1.

Other experts can be invited to the meetings if necessary. The Risk Committee meetings take place at least quarterly and are chaired by the Managing Board member with responsibility for the area. The Enterprise Risk Management (ERM) department organises the meetings and prepares the minutes. The Risk Committee results are the basis of the regular quarterly risk report for the Managing Board.

### REINSURANCE SECURITY COMMITTEE

The Reinsurance Security Committee deals with the creditworthiness of reinsurance companies and helps to ensure that a sufficient degree of diversification is available among the selected reinsurers and that the default risk within the reinsurance business remains within acceptable limits.

The Reinsurance Security Committee creates and adapts a quarterly list ("security list") of reinsurers acceptable to the Group. This list is included in the VIG Group Reinsurance Security Information Guideline, which the VIG Managing Board sends to the members of the Managing Boards of the different VIG Group companies responsible for reinsurance. The security list specifies the maximum reinsurance cessions to specific reinsurers (please note: cessions to reinsurers on the security list are subject to the limits set down in the "Cessions Limitation Table", which is included in the guideline above).

In the following two cases, the administrator must obtain an approval from the Reinsurance Security Committee prior to the start of the policy term:

- If the business (whether facultative or obligatory) is to be ceded to reinsurers who are not on the VIG security list, an individual review of the reinsurer and, if necessary, approval from the Reinsurance Security Committee is required.
- If the volume of the planned reinsurance cession to a reinsurer on the security list exceeds the limits stated in the "Cessions Limitations Table", an individual decision on approval must be made by the Reinsurance Security Committee.

The Reinsurance Security Committee consists of selected, professionally qualified employees from the reinsurance and functional areas of a number of VIG companies. The Reinsurance Security Committee rules are set down in the VIG Group Security Rulebook Guideline for SC members.



### **ASSET MANAGEMENT MEETING/WORKSHOP**

This is a platform designed to deal with current investment topics. These meetings are generally scheduled two to four times each calendar year. Additional meetings can also be organised if needed. The choice of participants depends on the topic chosen and the companies affected by the topic. Topics can be proposed by all Group companies or are specified by VIG Asset Management in consultation with the member of the VIG Managing Board responsible for the area. External experts can also be consulted for special topics. Asset management meetings address topics that have more of a general or strategic character. Asset management workshops address operational topics concerning investment.

### **TACTICAL INVESTMENT COMMITTEE**

The Tactical Investment Committee (TIC) deals with the structure of investments and the risk and earnings situation for the investments of the Austrian insurance companies. The TIC deals with issues relating to short-term liquidity requirements, providing advice and making decisions in this context. The TIC is firmly anchored in the companies' decision-making and information process.

The members of the TIC are:

- the Managing Board members responsible for asset management
- the Asset Management department
- the Asset Risk Management department and
- the accounting department

of the Austrian insurance companies. The committee, which usually meets on a weekly basis, can react promptly to the respective risk situation.

### **INVESTMENT MEETING**

Investment meetings deal with the structure of investments, the risk-return situation and the current and expected market environment of the VIG insurance companies outside Austria. Asset Management conducts these meetings for each country with all of the insurance companies concerned. The frequency is based on the volume and level of complexity of the respective investments and can also be organised on short notice if necessary.

In addition to Asset Management, the participants include the Managing Board members responsible for local asset management and the departments responsible for operational asset management, risk management and accounting.

### **LIQUIDITY COMMITTEE**

The meetings of the VIG Holding Liquidity Committee have taken place monthly since 2020, at least quarterly before that, and are prepared and coordinated by the Treasury incl. ALM department. Treasury incl. ALM, the Managing Board member responsible for the area and participants from Asset Management, Subsidiaries and M&A, Enterprise Risk Management, Planning and Controlling and the Finance Department are permanent members.

In addition to the current liquidity situation, the Liquidity Committee mainly discusses plan/actual deviations and short, medium and long-term liquidity changes. Investing all of the cash and cash equivalents and potential measures, in particular with respect to investing the liquidity reserve (liquidity buffer) that is held for unplanned events, are discussed and prepared for decision-making. A particular focus is on analysing and providing advice on the current and future liquidity needs of VIG Holding.

### **ASSET-LIABILITY MANAGEMENT COMMITTEE**

Asset-liability management is dealt with in regular committee meetings and ensures that an exchange of information takes place on the risk situation and the sensitivities of individual portfolios and their cash flows and maturity structures. The main focus is on long-term cash flows, in particular from life insurance, but the property and casualty and health insurance lines of business are also included. The overarching goal is an overall coordinated view of business development.

In addition to the Treasury incl. ALM, the permanent members also include the Managing Board member responsible for the department and the Actuarial, Asset Management, Asset-Risk Management, Controlling, Accounting, Risk Management and Affiliated Companies departments. Depending on the questions being handled, other representatives from associated departments may also be invited to the meetings. The Treasury incl. ALM organises the committee and prepares minutes.

#### **COMPLIANCE COMMITTEE**

The VIG Holding Compliance Committee was established as an institutionalised work platform for compliance-related matters. Meetings take place four times a year. The committee members are the four VIG Holding governance functions, the heads of selected risk-relevant organisational departments (2022: Asset Management, Asset Risk Management, Corporate Business, Digitalisation, Finance and Risk, European Affairs and ESG, Finance Department, General Secretariat and Legal, Holding IT, Human Resources, Investor Relations, Process & Project Management, Reinsurance, Subsidiaries and M&A) and special officers (2022: AML officer, CSR officer, data protection officer, Group information security officer).

During the Compliance Committee meetings, the committee members report on compliance matters in their areas of responsibility, in particular the implementation status of compliance-relevant processes, and inform each other about the current compliance matters. Cross-area discussions also take place concerning relevant statutory or regulatory amendments or changes and case law and their effects on VIG Holding. Appropriate responsibilities are assigned if the committee determines that action is needed. The meeting minutes are sent to the Managing Board for information.

### **B.1.3 GOVERNANCE AND OTHER KEY FUNCTIONS**

In addition to the four governance functions provided for in the VAG, other key functions were identified in VIG Holding and holders appointed to these functions. All governance and other key functions are organisationally located below the Managing Board as a whole or individual members of the Managing Board and report directly to the Managing Board. The governance functions also report periodically to the Supervisory Board Audit Committee.

#### **GOVERNANCE FUNCTIONS**

The following governance functions were established in VIG Holding in 2022:

- Compliance function
- Internal audit function
- Risk management function
- Actuarial function

#### **COMPLIANCE FUNCTION**

The compliance function is organisationally assigned to the Managing Board and reports directly to it during the performance of its duties. Organisationally, the compliance function is separate from the other governance or key functions of VIG Holding, performs its activities independently and is not entrusted with any operational duties of VIG Holding in the sense of the core business activities.

The function holder performs its role at the level of VIG Holding as a solo company and the level of VIG Insurance Group. The duties of the compliance function are specified in an internal policy for VIG Holding and include, among other things, the requirements placed on the function by insurance supervision law.

The duties include, in particular:

- Early warning function: In this regard, the compliance function identifies and assesses the possible impact of any changes in the legal environment on the company's activities and organisation, evaluates and communicates necessary measures and monitors their implementation.
- Compliance risk management function: The compliance risks are identified, evaluated and monitored at the overall company level.
- Preventive function: Measures to prevent non-compliance mainly consist of the preparation of internal company policies, guidelines and work instructions, the performance of awareness-raising measures (e.g. training) on compliance-related topics, and participation in projects to prepare for legal or regulatory changes or amendments.
- Advisory function: The compliance function advises the Managing Board and employees concerning applicable requirements and assists in the preparation of internal company workflows and processes for complying with these requirements.
- Appropriateness and monitoring function: The appropriateness of measures to prevent non-compliance is assessed during Compliance audits. A variety of monitoring activities are also performed to monitor compliance with legal requirements.

Appropriate arrangements have been made for substitutes for the compliance function in the case of absence. The function is also assisted in the performance of its duties by employees in the compliance department.

## INTERNAL AUDIT FUNCTION

The internal audit function is organisationally assigned to the Managing Board and reports directly to it during the performance of its duties. Organisationally, the internal audit function is separated from the other governance and key functions of VIG Holding, performs its activities independently and is not entrusted with any operational duties of VIG Holding in the sense of the core business activities. The function holder performs its role for VIG Holding as a solo company and at the VIG Insurance Group level.

The duties of the internal audit function are specified in the function description. These include the requirements for the function according to the VAG, namely examination of the legality, propriety and expediency of the (re-)insurance company's business, as well as the appropriateness and effectiveness of the internal control system and other elements of the governance system. This includes in particular:

- Audit planning on the basis of risk-oriented topics and ensuring comprehensive auditing activities
- Audit work, including auditing management, particularly with regard to the focus of the audit content, scope of the audit and subsequent coordination of the audit reports
- Reporting on the areas of the audit and significant audit findings to the members of the Audit Committee and Supervisory Board
- Ensuring follow-up of implementation of proposed measures

Appropriate arrangements have been made for substitutes for the VIG Holding internal audit function in the case of absence. The function holder is also assisted in the performance of its duties by the internal audit department employees.

## RISK MANAGEMENT FUNCTION

The risk management function is organisationally assigned to Managing Board member Liane Hirner and reports directly to her during the performance of its duties. The function is separated from the other governance and key functions of VIG Insurance Group, performs its activities independently and is not entrusted with any risk-taking duties in the sense of the core business activities. The same person<sup>1</sup> performs the function for VIG Holding and at the level of VIG Insurance Group.

The duties of the risk management function are specified in a function description and include, in particular:

- Regular risk identification and analysis (risk inventory)
- Assessment of the risk profile, implementation of the Own Risk and Solvency Assessment (ORSA)
- Quarterly reporting on risks based on the Risk Committee
- Quarterly and annual assessment of the solvency capital requirement
- Development and maintenance of the partial internal model
- Monitoring the risk-bearing capacity
- Annual review of the effectiveness of the internal control system (ICS)
- Preparation and updating of relevant policies and guidelines
- Further development and maintenance of the central computing platform for solvency calculation

Appropriate arrangements have been made for substitutes for the risk management function in the case of absence. The resources necessary for the above-mentioned tasks are grouped departmentally.

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<sup>1</sup> The current holder of the function will leave the Company on 30/06/2023 and the position will be filled accordingly.

## ACTUARIAL FUNCTION

The actuarial function is organisationally assigned to Managing Board member Peter Thirring and reports directly to him during the performance of its duties. The function holder performs its role for VIG Holding and at the level of VIG Insurance Group.

The duties of the actuarial function are specified in a function description and include, among other things, the requirements for the actuarial function stipulated in the VAG, in particular:

- Coordination of the calculation of technical provisions
- Ensuring the appropriateness of the methods and basic models used and the assumptions made in the calculation of the technical provisions
- Assessment of the sufficiency and quality of the data used in the calculation of the technical provisions
- Comparison of best estimates with experience values (back testing)
- Reporting to the Managing Board on the reliability and appropriateness of the calculation of technical provisions
- Monitoring the calculation of technical provisions
- Providing an opinion on the general risk underwriting policy and the appropriateness of the reinsurance contracts
- Contributing to the effective implementation of the risk management system, in particular with a view to creating risk models for the calculation of the solvency and minimum capital requirements and the own risk and solvency assessment

Appropriate arrangements have been made for substitutes for the actuarial function in the case of absence. The holder is also assisted in the performance of its duties by employees in the actuarial department.

## OTHER KEY FUNCTIONS

The head of asset management was identified as one of the other key functions in VIG Holding. The responsibilities and main duties of the Asset Management area are indicated in section B.3.1.

## INFORMATION AND REPORTING CHANNELS

Interactive communication is of major importance in VIG Holding. This ensures that all affected individuals have the necessary information available to adequately fulfil the duties and responsibilities assigned to them. This applies to all management levels right down to each individual employee. The information and reporting paths are based on a direct line. In particular, all governance and other key functions have set up a direct reporting channel to the Managing Board. Important decisions are prepared in the appropriate committees or by the functional departments before being adopted in regular Managing Board meetings and entered into the minutes of these meetings.

### B.1.4 SIGNIFICANT CHANGES TO THE GOVERNANCE SYSTEM

Except for the changes to the composition of the Supervisory Board described above, there were no significant changes to the governance system during the reporting period.

### B.1.5 SIGNIFICANT TRANSACTIONS

Except for the dividends and compensation, no significant transactions took place with shareholders, persons with significant influence over the company, or members of the Managing Board and Supervisory Board during the reporting period.

### B.1.6 COMPENSATION POLICY AND COMPENSATION PRACTICES

#### COMPENSATION STANDARDS FOR EMPLOYEES

The attractiveness of VIG Insurance Group as an employer is fostered by the fact that the compensation systems are appropriate and transparent. The following principles apply to VIG Holding and VIG Insurance Group.

The compensation policy reflects the risk awareness (including sustainability risks) of VIG Holding and VIG Insurance Group. In particular, the compensation practices may not promote a readiness to assume excessive risk at the expense of the company concerned and its stakeholders, or promote behaviour that would endanger the ability of VIG Insurance Group or the company to maintain an appropriate capital base.

The compensation policy promotes the focus on sustainable management at all company levels in VIG Insurance Group and the current strategy of VIG Insurance Group and the company. It aims to promote coherent action and to avoid conflicts of interest.

VIG Holding and the VIG Insurance Group companies observe all relevant statutory requirements when determining and applying the compensation policy.

The compensation takes working hours and the required qualifications, responsibilities and duties of the position concerned into account. Care is taken to ensure that the salary is not below the minimum wage applicable under the national law or existing collective bargaining agreements.

If a variable compensation component is agreed, the objectives that determine the variable compensation component must be transparent and updated once a year. If no minimum wage is required by law or collective agreement, the fixed compensation must be sufficiently high to prevent too great a dependence on variable compensation.

#### **COMPENSATION FOR GOVERNANCE FUNCTIONS, OTHER KEY FUNCTIONS AND RISK TAKERS**

The variable portion of the compensation for holders of governance and other key functions, members of the Managing Board and risk takers, is limited and emphasises the need for sustainability. Achieving the full amount of this compensation depends on an analysis of the sustainable development of the company that goes beyond a single financial year.

The solvency position is a central risk indicator which is constantly monitored as part of the risk-bearing capacity. The solvency ratio is taken into account when granting variable compensation components.

#### **SUPPLEMENTARY PENSIONS AND EARLY RETIREMENT SCHEMES**

Depending on the date an employee joined the company, individual VIG Insurance Group companies provide company pension payments for governance and key function holders that are based on individual contractual commitments.

#### **COMPENSATION POLICY FOR MEMBERS OF THE MANAGING BOARD**

Managing Board remuneration takes into account the importance of the Group and the responsibility that goes with it, the economic situation of the Company, and the appropriateness of the remuneration in the market environment.

The variable portion of the remuneration emphasises the need for sustainability and achieving it fully depends critically on an analysis of the sustainable performance of the Company that extends beyond a single reporting year.

The performance-related remuneration is limited. This also applies to the members of the VIG Insurance Group Managing Board. The maximum performance-related compensation that the Managing Board of VIG Holding can receive by achieving the standard targets in the financial year 2022 is around 30% to around 40% of total compensation. Special bonus compensation can also be earned for overachievement of targets and special strategic objectives. In total, the members of the Managing Board can earn variable compensation equal to a maximum of around 45% to 50% of their total compensation in this way.

Large parts of performance-related compensation are only paid after a delay. The delay for financial year 2022 extends to 2026. The deferred portions are awarded based on the sustainable performance of the Group.

The Managing Board is not entitled to performance-related remuneration if performance fails to meet certain thresholds. Even if the targets are fully met in a given financial year, because of the focus on sustainability, the full variable remuneration is only awarded if the Group also achieves sustainable performance in the three following years.

The main performance criteria (targets) for variable compensation in 2022 were the combined ratio, premium growth, result before taxes and – as a non-financial objective – the promotion of social responsibility in practice; for special bonus compensation the strategic objectives focused in particular on sustainability topics; compensation could also be earned from overachievement of targets in certain areas.

Managing Board remuneration does not include stock options or similar instruments.

Managing Board members are provided a company car for both business and personal use.

#### **PENSION PLANS**

Members of VIG Holding's Managing Board who were active as of 31/12/2019 are entitled to funded defined benefit pensions – based, among other things, on the length of service in VIG Insurance Group – equal to a maximum of 40% of the measurement base if they remain in the Managing Board until age 65. The measurement base is equal to their standard fixed remuneration. This pension amount can be increased in individual cases if work continues past the maximum pension age, since a pension is not drawn during this period.

Starting as of 01/01/2020, newly appointed members of the Managing Board can be granted entitlements to defined benefit pensions (alternatively entitlements to defined contribution pensions). As a rule, entitlements require at least one reappointment, and are granted in stages, so that the maximum entitlement of 40% of fixed remuneration cannot be reached until age 65 after at least 10 years of service as a member of the Managing Board. If a member of the Managing Board has previously served in other positions in the Group for at least 5 years, an entitlement can already be granted at the beginning of the term of office.

Pensions are normally received (regardless of the initial appointment date) only if a Managing Board member's position is not extended and the member is not at fault for the lack of extension, or the Managing Board member retires due to illness or age.

#### **SEVERANCE PAY**

The provisions of the Austrian Corporate Staff and Self-Employment Provision Act apply to the Managing Board contracts.

Only the contracts for members of the Managing Board of VIG Holding who have been active in the Group for a long time provide for a severance payment structured in accordance with the provisions of the Austrian Employee Act (Angestelltengesetz), as amended in 2003, in combination with applicable industry-specific provisions. This allows these Managing Board members to receive a severance payment equal to two to twelve months' remuneration, depending on the period of service, with a supplement of 50% if the member retires or leaves after a long-term illness. A Managing Board member who leaves by their own choice, without agreement with the Company, before retirement is possible, or leaves due to their own fault, is not entitled to severance payment.

#### **COMPENSATION POLICY FOR SUPERVISORY BOARD MEMBERS**

The members of the Supervisory Board are entitled to receive compensation approved by the General Meeting in the form of a payment remitted monthly in advance. Members of the Supervisory Board who withdraw from their positions before the end of a month still receive full compensation for the month in question. In addition to this compensation, Supervisory Board members are entitled to receive an attendance allowance for participating in Supervisory Board meetings and Supervisory Board committee meetings (paid after participation in the meeting).

There are no variable salary components or pension plans for members of the Supervisory Board.

Supervisory Board compensation does not include stock options or similar instruments.

No loans or guarantees were granted to the members of the Supervisory Board during the reporting period. There were also no loans or guarantees on 31 December 2022.



### B.1.7 ADEQUACY OF THE GOVERNANCE SYSTEM

The governance system of VIG Holding is well-defined and proportionate to the nature, scale and complexity of the company.

The responsibilities of the VIG Holding Managing Board are set down in the organisational plan for business areas. The duties and responsibilities in the individual departments of VIG Holding are also clearly specified, including in policies and guidelines. An organisational chart is available to employees on the Group network. A well-defined process organisation that is also reflected in policies and guidelines ensures that all VIG Holding employees are aware of the responsibilities and reporting lines (primarily to the higher level). Direct reporting lines from the department heads to the respective responsible members of the Managing Board ensure that relevant information is taken into account in the management of VIG Holding in an appropriate and timely manner.

As part of the governance system, all legally required governance functions have been established in VIG Holding, the existence of conflicts of interest is continuously monitored and, if necessary, appropriate measures are taken to avoid or deal with them. The duties and responsibilities of the governance functions are described in guidelines and function descriptions. Making the governance functions directly subordinated to the Managing Board as a whole (compliance, internal audit) or a Managing Board member responsible for the area (enterprise risk management, actuarial function) ensures they have an appropriate position in VIG Holding. The governance functions also report periodically to the Managing Board and the Supervisory Board Audit Committee. The governance functions also regularly participate in the meetings of the VIG Holding Managing Board and provide opinions on specialised topics. In addition to the ongoing exchange between governance functions, an institutionalised exchange on company-specific and Group-wide topics also takes place every two months. A member of the Managing Board also attends the meetings twice a year. The minutes are sent to the Managing Board for their information. Legally required and other risk-mitigation policies and guidelines have also been established in VIG Holding.

The VIG Holding internal control system is based on a Group-wide ICS policy and ensures that a control environment appropriate for its organisational structure and process organisation exists at all times. The Managing Board is informed about the status of the ICS each year. The function of the ICS is regularly audited by the internal audit department both separately and as part of other audits.

The compliance function performs risk-based compliance audits of the governance processes that have been established in order to ensure compliance with legal requirements. The results of these audits are reported (if necessary) to the Managing Board together with any necessary measures to be taken.

The internal audit department subsequently performs periodic audits according to the audit plan and, if necessary, ad hoc independent audits of various sub-areas of the governance system and reports on these audits to the Managing Board.

## B.2 FIT AND PROPER REQUIREMENTS

When appointing Managing Board members and holders of governance and other key functions, particular attention is paid to whether the candidate satisfies the fit and proper requirements.

The professional qualification (fit) requirements are defined in the respective function description for each function. In all cases, the following criteria are considered during recruitment:

1. Education (including studies)
2. Professional experience
3. Other knowledge (e.g. relevant legal knowledge or relevant technical knowledge)

Documentation relevant to the information in the CV is to be provided (certificates, diplomas, etc.).

When appointing Managing Board members and holders of governance and other key functions in the company, a number of measures are used to assess whether the person is of good reputation (proper).



- At least one objective element (test procedure, standardised conversation, more than one interview partner) is used during the recruitment process.
- Candidates must complete a form providing information about their financial situation, any involvement in relevant (criminal) proceedings, etc., must submit a certificate of good conduct that is no older than three months when hired, and must agree to notify the company of any future changes which occur during the employment relationship.

A fit and proper Group guideline at the VIG Insurance Group level was approved by the Managing Board to provide a uniform framework.

Managing Board members and the governance and other key functions are responsible for keeping up to date on all material aspects of their functions and ensuring that relevant information is made available within the company. This includes both technical, legal and regulatory aspects as well as, if necessary, internal company guidelines.

The necessary technical resources, funds and budgets are made available by the company to the members of the Managing Board and holders of governance and other key functions.

The individual companies also determine key personnel professional qualification (fit) requirements for the individuals who effectively manage the company, and the governance and other key functions in accordance with applicable local legislation.

Whether a person is of good reputation (proper) is also subject to local legal requirements in many areas.

#### **SUPERVISORY BOARD**

Supervisory Board members in insurance companies must become familiar with their specific duties under the Solvency II regime, which were included in the VAG effective 1 January 2016. Among other things, they must have sufficient professional qualifications.

## B.3 RISK MANAGEMENT SYSTEM INCLUDING THE OWN RISK AND SOLVENCY ASSESSMENT

The professional handling of risks is one of the core competences of VIG Holding. It uses a comprehensive risk management system to fully identify, assess, manage and monitor risks to which it is exposed. The own risk and solvency assessment is one of the key elements of the risk management system.

### B.3.1 RISK MANAGEMENT SYSTEM

#### STRATEGY AND OBJECTIVES

The risk strategy of VIG Holding is based on the following Group-wide principles:

##### ACCEPTED RISKS

- As a rule, VIG Holding accepts and assumes risks that are directly related to its activities as an insurance holding company and the insurance and reinsurance business it operates in addition to this.

##### RISKS THAT ARE NOT ACCEPTED

- Risks are not accepted if VIG Holding lacks the expertise or resources required to manage them (e.g. insufficient capital to cover the risks).
- As for investments, risks are not accepted if adequate expertise is not available to assess the risks, e.g. weather derivatives and agricultural commodity futures, or risks where the potential loss is unlimited.

##### RISKS ACCEPTED WITH RESTRICTIONS

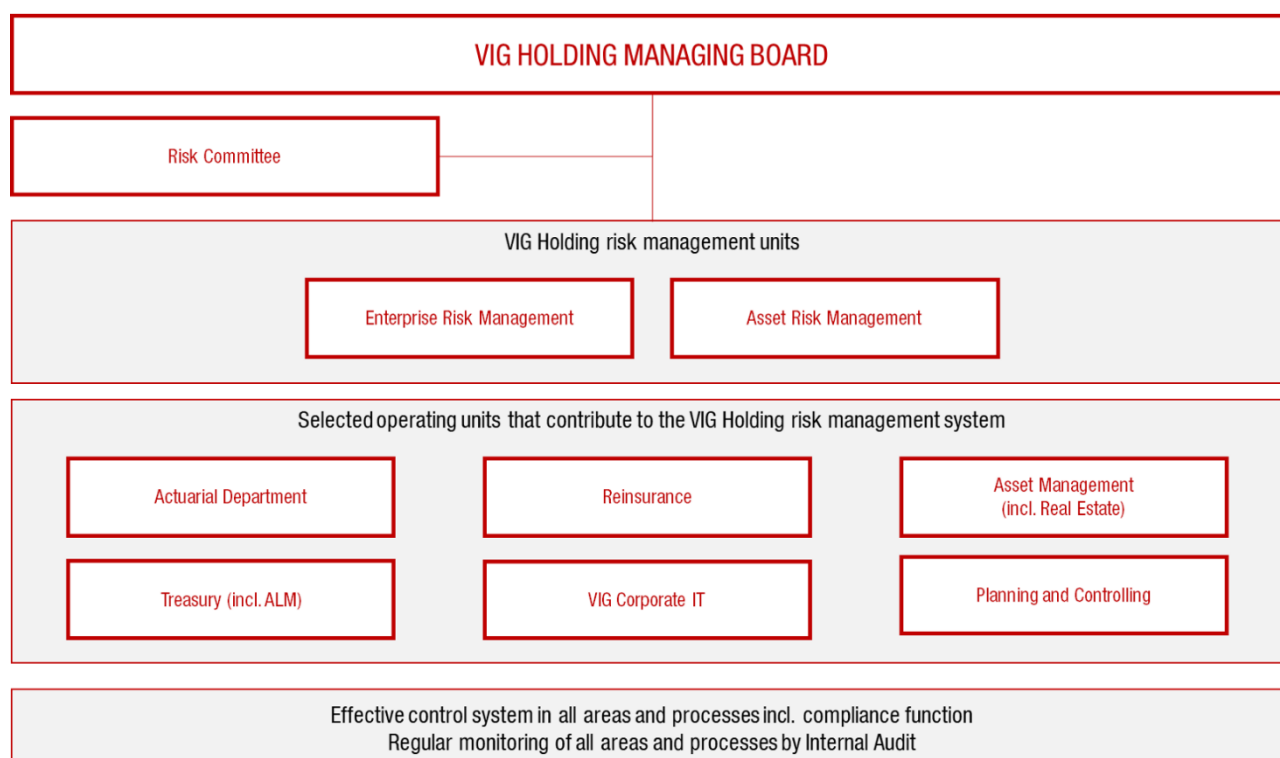
- Operational risks must be avoided as far as possible, but have to be accepted to a certain extent as they cannot be fully excluded, or the costs for avoiding them exceed the expected losses.
- A conservative approach is used for investments.

##### RISK-MITIGATING MEASURES

- Establish functional risk governance by maintaining and promoting a high level of risk awareness.
- Reinsurance is a key instrument for hedging against large losses (tail risks) in the property and casualty area.
- Market risk is strictly limited and investments are always matched with VIG Holding's obligations.
- Observe and act in accordance with the prudent businessman rule in connection with investments.

## ORGANISATION OF THE RISK MANAGEMENT SYSTEM

The risk management system is well integrated into VIG Holding's organisational structure. The following chart shows the units that play an important role in the risk management system.



### MANAGING BOARD

The Managing Board as a whole is responsible for the risk management system, in particular for the following areas:

- Set up and promote the risk management system
- Define and communicate the risk strategy, including risk tolerances and risk appetite
- Approve corporate risk management guidelines
- Take the risk situation into account in strategic decisions

Both the Enterprise Risk Management and Asset Risk Management units report directly to Managing Board member Liane Hirner. They are assisted by the Digitalisation, Finance and Risk department, which also reports to Managing Board member Liane Hirner and is where the Solvency II reporting system is organised.

### RISK COMMITTEE

The VIG Holding Managing Board established the Risk Committee to ensure regular discussions of current matters relating to risk management across functional areas within the organisation and an exchange of information on the risk situation between the members of the committee and the Managing Board. The Risk Committee meetings take place at least quarterly and are chaired by the Managing Board member responsible for this area. The Risk Committee reports to the Managing Board after its meetings.

#### **ENTERPRISE RISK MANAGEMENT**

The department reports to Managing Board member Liane Hirner. The head of the department performs the risk management function required under Solvency II at the Group and solo level.

The main responsibilities of the department include determining the Group's overall risk profile and calculating solvency. The department provides a Group-wide risk aggregation solution for this purpose with extensive reporting and partial modelling approaches for calculating solvency capital. Calculation of the solvency capital requirement during the year, analysis of risk-bearing capacity using proprietary analysis tools and reviewing the internal control system are other important activities performed by the department.

The department also assists the Managing Board with updating the corporate risk strategy, improvements to the risk organisation and further corporate risk management topics.

#### **ASSET RISK MANAGEMENT**

The department reports to Managing Board member Liane Hirner. The primary role of the department is to analyse, assess and monitor the risks associated with investments, in particular with regard to the solvency and financial results of VIG Insurance Group. For this purpose, the department specifies Group-wide requirements for risk assessment and implements a central system for investment management and risk monitoring. The department is also responsible for maintaining an internal rating approach.

#### **ASSET MANAGEMENT (INCL. REAL ESTATE)**

The department reports to Managing Board member Gerhard Lahner. One of the key responsibilities of the department is to define a strategic orientation for the investments of each insurance company and for VIG Insurance Group as a whole, and to specify an investment strategy and investment process aimed at ensuring that current income is as high as possible, but also as secure as possible, while simultaneously taking advantage of opportunities to increase the value of investments. Guidelines and limits are used to manage investments. Regular reports are also provided for investments, limits and income.

#### **ACTUARIAL DEPARTMENT**

The department reports to Managing Board member Peter Thirring. The management of the department performs the actuarial function required by Solvency II. The department is therefore responsible, in particular, for the duties related to the actuarial function. The Actuarial department also calculates the embedded value for the life and health insurance businesses and prepares profitability analyses and company valuations. The department assists with actuarial collaboration and functional networking.

#### **REINSURANCE**

The department reports to Managing Board member Peter Höfner. The department coordinates and assists all companies in VIG Insurance Group and their reinsurance departments with reinsurance matters in the non-life business (property and casualty, third party liability and accident insurance) by preparing and applying guidelines. The department also manages Group-wide reinsurance programmes in the non-life lines of business. The primary objective is to create a safety net to provide continuous protection for all of the companies in VIG Insurance Group against the negative effects of catastrophes, individual large losses and negative changes in entire insurance portfolios.

#### **PLANNING AND CONTROLLING**

The department is an important part of the integrated risk management approach and reports to Managing Board member Hartwig Löger. The department coordinates business planning over a 3-year horizon. The standardised reports include key figure and variance analyses for planning, forecasts and ongoing performance of VIG Holding and other insurance companies. Regular monthly premium reports, quarterly reports for each company (aggregated at the country and VIG Insurance Group level) and cost reports are prepared.

#### **HOLDING IT**

The Holding IT department reports to Managing Board member Gerhard Lahner. The department is responsible for managing IT at VIG Holding level (IT strategy, IT governance, IT security, IT projects, etc.) and works closely with the VIG Corporate IT department, which is responsible for these matters at a Group level.

#### **TREASURY (INCL. ALM)**

The department reports to Managing Board member Gerhard Lahner. The observation, measurement and optimisation of future cash flows on the asset and liabilities sides are the main responsibilities of the Asset Liability Management department. It is also responsible for the exchange of knowledge and improvements in the Group in this area.

#### **COMPLIANCE**

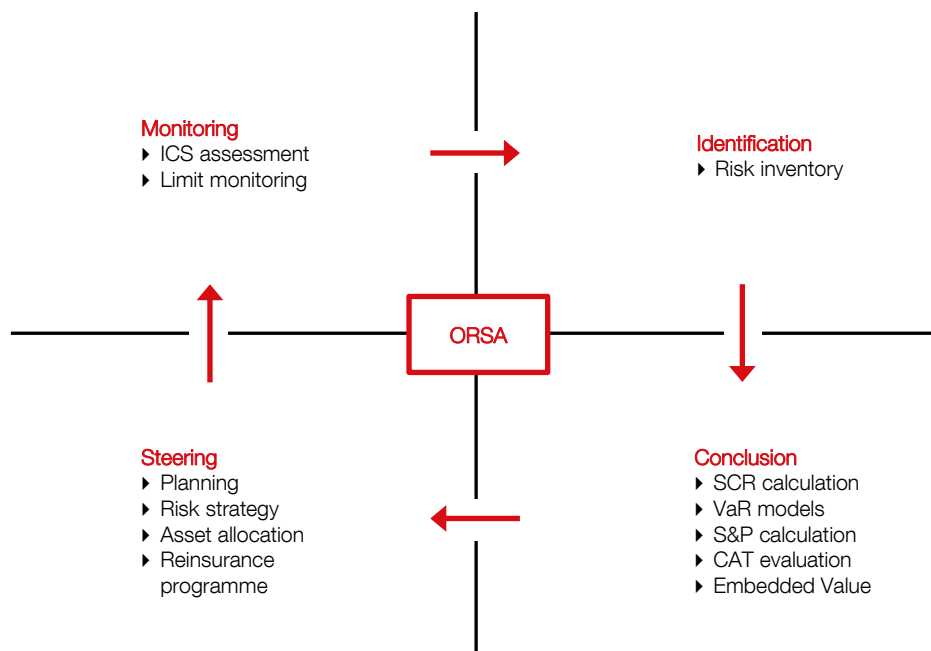
The department reports to the Managing Board. Managing Board member Peter Thirring is the contact person in the Managing Board. The department coordinates and assists all companies in VIG Insurance Group and their compliance areas with respect to compliance matters. The management of the department performs the compliance function required by Solvency II. The department is therefore responsible, in particular, for the duties related to the compliance function.

#### **INTERNAL AUDIT**

The department reports to the Managing Board. Managing Board Chairwoman Elisabeth Stadler is the contact person in the Managing Board. The Internal Audit department systematically monitors operating and business processes, the internal control system of all operational business areas, including compliance with legal requirements, and the functionality and adequacy of risk management. The department operates continuously and reports directly to the Managing Board. The management of the department performs the internal audit function required by Solvency II.

## RISK MANAGEMENT PROCESSES

The chart below shows the overall process. The most important milestones from the graph are briefly described in the following section.



### RISK IDENTIFICATION

Risk identification is based both on a standardised process (risk inventory) and on ad hoc analyses and comprehensive reporting processes in the event of newly identified risks or extraordinary events that affect the risk profile.

The risks are identified and analysed with the support of the first and second management levels during the risk inventory. The quantitative evaluation of risks is primarily based on the results of the internal models and the standard formula. If the standard formula is used for assessment, an appropriateness check is also performed. The results of the risk inventory process are summarised in a report and then approved. They also represent an essential basis of the ORSA process.

### RISK ASSESSMENT

The results from the calculation of the overall solvency need and embedded value, the findings from the S&P capital model and the value-at-risk (VaR) calculations from the investment area (see section C) are used in the risk assessment.

### RISK STEERING

The key risk steering processes are:

#### RISK STRATEGY

The risk strategy is reviewed annually by the Managing Board and modified, if necessary, based on the results of the ORSA. The Enterprise Risk Management department assists the Managing Board with this.

#### PLANNING

The planning horizon is three years. In the ORSA, planning data is taken into account and used as a projection basis for the expected future solvency.

#### RISK-BEARING CAPACITY

Risk steering activities are conducted taking into account the risk-bearing capacity. In practice, this means adherence to risk budgets, the accomplishment of key indicators and a general risk-based approach in terms of a sustainable value-oriented approach in daily business operations.

#### REINSURANCE PROGRAMME

The Reinsurance department coordinates the Group-wide reinsurance programme and manages the annual renewal process for natural catastrophe coverage. The Enterprise Risk Management department assists the Reinsurance department in validating the external natural catastrophe models used and assessing the effectiveness of reinsurance coverage using the non-life internal model.

#### RISK MONITORING

The solvency corridor defined at the Group level and the Group-wide limit system applicable in the course of the risk-bearing capacity form the basis for continuous monitoring of the solvency situation of VIG Insurance Group and its subsidiaries.

Compliance with the securities guidelines and key figures is also continuously checked and monitored. Monitoring is performed by means of regular fair value assessments, VaR calculations and detailed sensitivity analyses and stress tests and calculating the SCR during the year.

Liquidity risk is managed and monitored by matching the investment portfolio to insurance obligations. Operational and strategic risks which might be caused by deficiencies or errors in business processes, controls or projects, or by changes in the business environment, are also continuously monitored using the internal control system.

### B.3.2 GOVERNANCE OF THE PARTIAL INTERNAL MODEL

VIG Holding uses a PIM for non-life and property risks in order to calculate the solvency capital requirement. The PIM was developed under the leadership of VIG Holding together with selected VIG Insurance Group companies and was approved by the FMA at the end of 2015.

The VIG Holding Managing Board is responsible for the establishment and functioning of the processes described below. Operational responsibility is allocated as follows:

Process	Non-life	Property
Parametrisation/calculation	Risk management function	Risk management function
Validation	Risk management function*	Asset Risk Management
Data input/quality	Risk management function	Risk management function
Technical provisions	Actuarial function	–
Model use	Reinsurance, controlling in connection with the risk management function	Asset Management (incl. Real Estate) and Subsidiaries management in connection with the risk management function
Model changes	Risk management function	Risk management function
Documentation	Risk management function	Risk management function

\* While maintaining the independence required for the parametrisation/calculation

The model results are of major importance to the management of the company. This is reflected in various areas of VIG Holding. For example, the model is regularly used as part of the planning process, for the renewal process of the reinsurance programme, for the acquisition and sale of real estate or for risk-return analyses.

Due to the significance of the model for the management of the company, the PIM is subject to particularly high governance requirements, which are reflected in specific and independently performed validation methods. In addition to the model assumptions and basic methodology, the main validation procedures also include, for example, the following:

- Assessment of the accuracy, completeness and appropriateness of the data used
- Sensitivity tests
- Stress tests and scenario analyses
- Stability test

The results of the validation tests are approved by the responsible Managing Board member. The model processes described above are subject to clearly defined rules, which are well-documented in a manner understandable to third-party experts. Validation is performed while maintaining the necessary independence. Model changes may only be performed in accordance with strict requirements. This ensures that the PIM is an inherent part of the risk management system and is subject to a well-defined process within the governance system of VIG. There were no significant model changes during the reporting period.

### **B.3.3 OWN RISK AND SOLVENCY ASSESSMENT (ORSA)**

The following ORSA objectives stem from the regulatory framework and additional corporate requirements:

- Assessment of the overall solvency need, including:
  - Description of the company's risk profile
  - Forward-looking assessment of own risks
  - Calculation of the capital base
  - Performance of stress tests and scenario analyses
- Description, review and, if necessary, adjustment of the company's strategic direction
- Description, review and, if necessary, adjustment of the risk management processes and procedures
- Review of continuous compliance with regulatory requirements
- Review of the adequacy of assumptions used to calculate the solvency capital requirements

The ORSA ensures that the Managing Board is continuously informed about the risks which VIG Holding is exposed to in the short and long term. As a result, necessary measures can be taken to manage and effectively steer these risks in a targeted way.

As shown in Section B.3 above, the ORSA is connected with many other processes within VIG Holding and is performed on an annual basis across the Group based on the ORSA guideline and a supplementary ORSA manual which is adapted each year. Ad hoc reviews of the own risk and solvency assessment are also carried out if this becomes necessary due to a significant change in the risk profile.



The following table provides a brief overview of the key roles and responsibilities in the ORSA:

#### IMPORTANT ROLES AND RESPONSIBILITIES IN THE ORSA

Function	Responsibilities
Managing Board	<ul style="list-style-type: none"> <li>▶ Overall responsibility for the ORSA process</li> <li>▶ Definition of requirements for performance of the ORSA process</li> <li>▶ Determine the strategic orientation</li> <li>▶ Implementation of adequate risk management processes and procedures</li> <li>▶ Ensuring completeness and reliability of results</li> <li>▶ Preparation and approval of the ORSA report</li> </ul>
Risk management function	<ul style="list-style-type: none"> <li>▶ Coordination and implementation of the ORSA process</li> <li>▶ Preparation of core contents of the ORSA (risk profile, projection, sensitivities, etc.)</li> <li>▶ Consolidation and final editing of the overall report</li> <li>▶ (Further) development of Group guidelines, methodology and templates</li> <li>▶ Provision of necessary documents for the ORSA process</li> <li>▶ Support during the preparation of the ORSA report at Group level</li> </ul>
Area head	<ul style="list-style-type: none"> <li>▶ Support of the risk management function during preparation of the ORSA report</li> <li>▶ Implementation of the defined business, risk and capital strategy</li> </ul>

On the basis of the company's own business and capital planning, the overall solvency needs are projected together with the solvency capital requirements and the available capital base over the entire planning period. The extent to which possible deviations from the planned business development would affect VIG Holding is then determined on the basis of appropriate stress tests or scenario analyses. This is to ensure that even in the event of adverse business developments that VIG Holding has access to sufficient funds in the short and long term to cover its own liabilities and that regulatory solvency capital requirements are met.

The knowledge gained from the projection and stress tests is the basis for the definition of strategic measures. In cooperation with the Managing Board, the preliminary results are discussed and VIG Holding's business planning is adjusted if necessary. The Managing Board reviews the strategic direction of VIG Holding based on the results. It includes the business strategy, which defines the main principles to achieve the objectives, a comprehensive risk strategy, which determines the appropriate risk management measures for major risks and the capital strategy, which ensures sufficient own funds in terms of the risk-bearing capacity.

The results and findings of the annual ORSA process are summarised in the ORSA report. After the report is approved by the Managing Board, it is sent to the Austrian Financial Market Authority (FMA) within a period of two weeks. In addition, the Supervisory Board and all relevant employees are informed about the results of the report to the extent necessary to perform their duties.

## B.4 INTERNAL CONTROL SYSTEM

The internal control system (ICS) is an important risk control element and is firmly anchored in the entire VIG Insurance Group. It is based on an appropriate process organisation with clearly defined areas of decision-making and responsibility. Based on this determination of responsibility, duties and general requirements and guidelines are established for the respective departments, which set up the framework of the ICS. These include, among other things, the following measures to ensure proper operations: Four-eyes principle, technical audits, comparisons, records and interviews with experts, as well as the establishment of a compliance function which monitors compliance with legal requirements.

### B.4.1 DESCRIPTION OF THE INTERNAL CONTROL SYSTEM

The standards and principles set down in the guideline are defined across the entire Group and form the basis of the ICS. This ensures that the ICS provides verifiable assurance as to the effectiveness and efficiency of the operations, appropriateness of the controls used, accuracy of information and compliance with internal and external requirements. The Group standards are as follows:

#### ICS GROUP STANDARDS

Standard	Contents
Standard 1	Each company must establish and promote a control culture that recognises and demonstrates the importance of controls for corporate action at all levels of the company.
Standard 2	Each company must establish and maintain an organisational structure and process organisation that is adapted to the size and complexity of the business.
Standard 3	All roles and responsibilities in the processes must be clearly defined. In addition, adequate controls need to be established to avoid conflicts of interest.
Standard 4	Each company must fully identify and assess the risks arising from its activities and processes that may adversely affect its business objectives and must apply appropriate controls.
Standard 5	Controls must be established at all levels of the company to an appropriate extent.
Standard 6	Effective communication channels and information systems must be established in all companies to ensure that each employee is aware of the guidelines and procedures applicable to his or her area of responsibility and that employees receive the information required for their work.

The ICS is integrated into the organisational structure and process organisation. The roles and responsibilities in the ICS are clearly defined and presented in the following table:

#### ROLES AND RESPONSIBILITIES IN THE ICS

Function	Responsibilities
Managing Board	Overall responsibility for the implementation and effectiveness of the ICS
Risk management function	Responsibility for the coordination and performance of the ICS assessment process, including reporting to the Managing Board, as well as responsibility for the continuous development of the methodology, templates and Group requirements
Compliance function	Assistance in the identification of compliance risks and ensuring appropriate control measures within VIG Insurance Group
Internal Audit	Downstream independent review of the internal control system in accordance with the audit plan or as requested by the Managing Board/Supervisory Board
Area head	Responsibility for the identification of risks and implementation of adequate controls in the respective areas of responsibility
All employees	Risk-conscious work, identification and communication of potential control weaknesses to the supervisor, carry out controls, ensuring adequate documentation of the control activities

The documentation produced within the scope of the process includes a standard summary of all material risks and controls. The actual control documentation is based on Group-wide ICS guidelines, is in the responsibility of each organisational unit and consists of, among other things: Organisational and process flow charts, policies and guidelines, records, work instructions and control reports.

Essentially, each employee must ensure an adequate control environment in his or her department to minimise operational risks. Both internal and external ICS reviews are performed to ensure that the company has an adequate internal control system.

The effectiveness of the ICS is assessed once a year by the operating units, i.e. the control owners, during the Group-wide process.

To ensure an orderly process, clear guidelines are defined and a local ICS manager is also available in each company as a contact person who independently performs the local process and reports the results to the local Managing Board and the Group.

Following the receipt of the local reports, the risk management function consolidates the results of the individual companies and submits the VIG Holding report and Group-wide report to the Managing Board.

#### **B.4.2 COMPLIANCE FUNCTION**

The compliance function of VIG Holding is organisationally subordinated to the Managing Board and reports directly to it. Peter Thirring is the Managing Board contact person for the compliance function. The compliance function performs its activities independently and is not entrusted with any of the operational duties of VIG Holding in the sense of the core business activities.

The compliance function is active at both the VIG Holding and VIG Insurance Group level, is decentrally structured and has been established separately from the other governance and key functions of VIG Holding. It performs the duties specified in the VIG Holding compliance function guideline. Other subject-specific compliance-related guidelines also exist for VIG Holding.

A Compliance Committee was established at the VIG Holding level in the decentralised organisation, consisting of the compliance function and the compliance officers. They are the other governance functions, the heads of other risk-relevant departments and special officers. Meetings take place four times a year. The minutes are sent to the Managing Board for their information. The compliance function coordinates the compliance activities in VIG Holding, and the compliance officers are responsible for compliance with statutory and regulatory measures in their organisational areas and implementation of the compliance duties assigned to them. The function also promotes coordinated collaboration on compliance agendas and ensures an appropriate flow of communication on compliance-relevant topics within VIG Holding. The compliance officers assist the function in the performance of its duties.

A committee, the Group Compliance Committee, was also established at the VIG Insurance Group level, consisting of the VIG Insurance Group compliance function, the compliance officers of the VIG (re-)insurance companies and individual specifically defined non-(re-)insurance companies in and outside the EU. Meetings take place at least once a year. The Managing Board is informed accordingly of the contents of this meeting. The local compliance officers are responsible for implementing compliance responsibilities in their companies. They are managed, advised, assisted and monitored by the VIG Insurance Group compliance function.

#### **COMPLIANCE POLICY**

A compliance policy, the VIG Holding compliance function policy, was established to satisfy the requirements for a compliance policy. It is based on the Group Compliance Management System Policy and Group Compliance Management Implementation Guideline and specifies the work procedures, duties, responsibilities, competences and reporting requirements of the compliance function at the VIG Holding level. The compliance policy is reviewed at least once a year to ensure that it is correct and up to date and is amended, if necessary, to take account of legal, regulatory, Group and company changes.

## COMPLIANCE PLAN

The VIG Holding compliance plan for the financial year 2022 was approved by the Managing Board. VIG Holding's activities during the reporting period were aimed at consolidating the compliance management system, with a particular focus on monitoring the dynamic legal environment and preparing for the entry into force of new or amended legal provisions, ensuring compliance with international sanctions, increasing business partner due diligence, expanding preventative activities (especially training) and monitoring the increasingly complex legal environment, especially in the area of international sanctions.

## COMPLIANCE REPORTING

A regular report is provided to the Managing Board once a year as part of the compliance annual report. In this report, the compliance function reports on the activities performed during the calendar year, both at the VIG Holding and VIG Insurance Group level. This includes, in particular, information on whether planned activities have been implemented. When needed, ad hoc reports are provided to the Managing Board, VIG Holding and, if necessary, the Supervisory Board.

## B.5 INTERNAL AUDIT FUNCTION

The VIG Insurance Group Internal Audit department directly performs the internal audit function for VIG Holding and the Group internal audit function for all VIG companies. In addition, it also currently acts as the internal audit department of Wiener Städtische (Austria), Donau Versicherung (Austria), InterRisk Life and Non-Life (Germany), Vienna Life (Liechtenstein) and VIG Re (Czech Republic). Its activities as Group Internal Audit department are also based on § 119 VAG.

The Group Internal Audit department issues audit standards and performs audits, among other things, of the activities of the local internal audit departments, of the compliance with the Group-wide internal policies and of certain areas in VIG companies in cooperation with the local internal audit departments. Draft reports by the Group Internal Audit department are sent to the respective audited company for approval. After the draft has been sent to the Managing Board in German and/or English, the company has three weeks to submit an opinion. If this deadline passes without feedback, a further period of two weeks may be granted. If no opinion is issued within this period, it is assumed that the company has approved the contents of the draft report, including any proposed measures.

Both the local internal audit department and Group Internal Audit department are fully entitled to inspect and access all (written or electronic) data and verbal information without limitation. The responsibility of each company to establish and ensure the functioning of the internal audit department is not affected by the audits performed by the Group Internal Audit department.

The local internal audit department is assigned to the respective Managing Board or Supervisory Board according to the applicable statutory regulations. In the following matters, however, the Group Internal Audit department is to be involved in all cases in coordination with the local Managing Board or Supervisory Board:

- Appointment and dismissal of the head of a local internal audit department
- Serious fraud
- Audit topics that go beyond the authority of the local internal audit departments of the individual companies, such as topics that affect more than one VIG company in a country
- In the case of an internal audit topic for which no specific know-how is available in the local internal audit department

The annual audit planning of each local internal audit department is targeting the risk-oriented aspects – in addition to the respective legally mandatory audits. A multi-year plan is also created, which covers a period of three to a maximum of five years and covers all company areas. The focus must be on material areas. Whether a company area is material depends on risk-related factors. The following areas are always considered material: claims, underwriting, investments, reinsurance, accounting and the IT area. If the internal control system is not audited together with these topics, as a whole it must be considered a material company area and audited annually. This multi-year plan also flows into the annual audit plan. The local internal audit department also audits significant anomalies which cannot initially be explained during the year – independent of the planning – if such anomalies arise during the analysis of the company's data. The audit plan must also include the governance system.

The available resources, relevant national legislation and any recommendations of the financial statement auditor or the Group Internal Audit department are taken into consideration during the audit planning. The proposal for the annual audit plan prepared by the local internal audit department is agreed with the Group Internal Audit department in advance in a timely manner. Any changes are announced without delay during the year.

## B.6 ACTUARIAL FUNCTION

The actuarial function performs the main duties and responsibilities described in section B.1.3. It implements these in cooperation and through communication with other areas and functions.

An internal data request as well as a data and calculation process have been established to calculate the technical provisions for VIG Holding.

Companies that cede reinsurance to VIG Holding, the reinsurance department of VIG Holding and VIG accounting are the data sources for the indirect business of VIG Holding. With respect to the direct business of VIG Holding, data is supplied by the Wiener Städtische claims & statistics department.

Additionally a wide exchange of expertise and relevant information for the assessment of technical provisions takes place. In this regard, the actuarial function actively communicates with its peer departments of the individual companies (actuarial, claims, reinsurance and accounting departments).

With regard to the calculation of the SCR and the MCR, the actuarial function communicates with the risk management function, as the technical provisions are input data for the risk calculation with the PIM and the standard formula.

The policy towards risk is consistent with VIG Insurance Group strategy and does not result in additional material risk in VIG Holding. The reinsurance is consistent with the VIG Insurance Group strategy and also does not result in additional material risk in VIG Holding. In particular, a high proportion of direct business is reinsured. The observed loss history supports the assumption that the underwriting and reinsurance policies are complied with and that the reinsurance is set at an appropriate level.

In order to document their activities and to pass on information directly to the Managing Board and Supervisory Board, the actuarial function submits an annual report to the Managing Board. The report contains a summary of the results of the above-mentioned activities. It primarily provides an overview of the overall situation of VIG Holding and any measures and recommendations of the actuarial function.

## B.7 OUTSOURCING

A VIG Holding outsourcing policy was established for VIG Holding that implements the Group-wide minimum standards for outsourcing business activities and functions in the Group Outsourcing Policy for VIG Holding.

The VIG Holding Outsourcing guideline defines a clear process for outsourcing. The outsourcing officers who must be appointed for all outsourcings are responsible for compliance with it. They also ensure that legal and regulatory requirements are satisfied when outsourcing. This includes, in particular:

- Transfer of regulatory responsibilities only within the legally permissible scope
- Availability of appropriate organisational control structures and intervention opportunities to control the activities related to outsourcing
- Evaluation of the risk and materiality for all the existing and planned future outsourcing activities and compliance with the requirements for outsourcing agreements by the person responsible for outsourcing
- If legally required, notify the FMA of outsourcing contracts or obtain prior approval of outsourcing contracts from the FMA
- Compliance with the outsourcing agreement
- Continuous monitoring and documentation of outsourced activities and corresponding reporting to the Managing Board

The VIG Holding Outsourcing guideline specifies that an outsourced activity must be appropriately assessed, the service providers carefully selected and a due diligence examination performed before an outsourcing agreement is concluded. It also specifies the minimum contents of outsourcing agreements and, if relevant, the process for notification of and approval by the FMA. After an outsourcing agreement is concluded, it must be ensured that there is a systematic structured transfer of the activity or function to the service provider and that suitable risk management guidelines and process exist that are appropriate based on the scope and complexity of the agreement. Continuous monitoring of compliance with the outsourcing agreement and corresponding central documentation must also be ensured. Finally, appropriate controls and reports must be agreed with the service provider and examined using appropriate criteria.

### CRITICAL OR IMPORTANT FUNCTIONS AND ACTIVITIES

For VIG Holding, it was decided to outsource IT services to internal and external IT service providers. Outsourcing agreements that had been approved by the supervisory authority existed in 2022 with IBM Austria (Internationale Büromaschinen Gesellschaft m.b.H.) and the internal Group IT system provider twinformatics GmbH, both headquartered in Austria. The outsourcing agreement with IBM was terminated as a result of the assumption of all related services by twinformatics with effect from 28/02/2023. twinformatics GmbH has also assumed full responsibility for all IT services (with the exception of those listed in the following paragraph) for the Austrian VIG insurance companies and concludes any sub-outsourcing required for this purpose while observing statutory and regulatory requirements and after consulting with the VIG insurance companies.

From 01/03/2023, IT services in the VIG Group will be provided by VIG IT-Digital Solutions GmbH ("VIG IT-DS"). VIG IT-DS was founded by VIG Holding in order to further reinforce the alignment of IT services to be provided Group-wide and to have these services provided by a company that focuses on these services. Meanwhile, an outsourcing agreement approved by the Austrian Financial Market Authority (FMA) was concluded with VIG IT-DS. This agreement sets out the ultimate responsibility of VIG IT-DS (with twinformatics as a key sub-service provider) for all VIG solutions (SAP NewGL, IFRS 9/17, ReadSoft and some smaller supporting applications). In addition to these outsourcing agreements, VIG Holding has not outsourced any critical or important functions or business activities.

## B.8 ANY OTHER INFORMATION

No other information on the VIG Holding governance system is to be reported in the reporting period.

## C RISK PROFILE

The risk management system described in Section B.3, including the own risk and solvency assessment, is aimed at determining the VIG Holding risk profile, among other things. VIG Holding uses both quantitative and qualitative methods. The quantitative evaluation using the standard formula only applies to those areas in which a previous adequacy test has confirmed the validity of the standard formula. In other areas, VIG Holding relies on an internal model, as this reflects the actual risk situation, in contrast to the standard formula. The non-life business and property investments are therefore modelled internally.

The risk profile of VIG Holding is based on its function as a holding company. As the parent company, VIG Holding holds the participations in the operating insurance companies of VIG Insurance Group and is therefore mainly exposed to strategic investment risk. This risk is part of the equity risk (a sub-risk of market risk) but is significantly less risky due to its long-term strategic nature.

The total solvency capital requirement for VIG Holding was TEUR 2,535,818 as of 31 December 2022 (31/12/2021: TEUR 2,403,963). There were no material changes in the VIG Holding risk profile compared to the previous year.

In sections C.1 to C.6, the risk profile of VIG Holding as a solo company is described in accordance with the main risk categories prescribed in VAG 2016, with risk exposure, risk concentration, risk mitigation and risk sensitivity also discussed where material.

The risk profile is internally divided into the following 10 main risk categories, which cover all potential VIG Holding risks (incl. sustainability risks<sup>1</sup>). The classification of these categories in the required SFCR risk structure specified in Article 295 of Delegated Regulation (EU) 2015/35 is shown in the following table:

### VIG HOLDING RISK STRUCTURE

SFCR structure	Risk profile
C.1 Underwriting risk	Life underwriting risk Non-life underwriting risk Health underwriting risk
C.2 Market risk	Market risk
C.3 Credit risk	Counterparty default risk
C.4 Operational risk	Operational risk
C.5 Liquidity risk	Liquidity risk
C.6 Other material risks	Strategic risk Reputation risk Intangible asset risk

<sup>1</sup> Sustainability risks are not handled as a separate category in the regular risk management process, but are instead assigned to the indicated risk categories based on the underlying risk.



#### **IMPLEMENTATION OF THE PRUDENT PERSON PRINCIPLE**

The VAG in general and the prudent person principle in particular require greater direct responsibility of the company to invest with caution. VIG Holding has always used a conservative approach for its investments. The supervisory requirements which are now applicable are a confirmation of the policy chosen by the company.

The assessment of investment risks in a constantly changing regulatory environment requires a correspondingly high level of expertise within the individual companies of the Group and VIG Holding as a central control unit. Trained personnel and the necessary professional infrastructure are essential to meet these requirements. VIG Insurance Group has expressly committed to meeting these requirements and has contributed to their fulfilment by, for example, implementing a standardised software to manage and assess risks associated with significant investment portfolios.

The key principles of commercial prudence are defined in the internal guidelines, which apply to all insurance companies in VIG Insurance Group.

The asset management of investments of the individual companies is embedded in a multistage process. The primary objective of managing investments is to comply with the insurance obligations on a sustainable basis. When investing, the liabilities portfolios are taken into account on a company level.

#### **SPECIAL PURPOSE VEHICLES AND OFF-BALANCE SHEET ITEMS**

VIG Holding does not use special purpose vehicles (SPVs). Therefore there is no risk exposure resulting from risk transfers to special purpose vehicles. In addition, there are no material risk exposures resulting from off-balance sheet items.

#### **UNDERTAKING-SPECIFIC PARAMETERS**

No undertaking-specific parameters in accordance with Article 104 (7) of Directive 2009/138/EC were used in the calculation. No undertaking-specific parameters in accordance with Article 110 of the Directive were used.

## C.1 UNDERWRITING RISK

The underwriting risks are divided into the life insurance, non-life insurance and health insurance (incl. accident insurance) areas.

### C.1.1 LIFE UNDERWRITING RISK

The life underwriting risk includes risks that directly stem from distribution characteristics, such as lapse risk as well as risks arising from changes to life expectancy or disability rates. Life underwriting risks are taken into account during product design, although major unforeseen changes in the statistical characteristics can result in losses.

#### RISK EXPOSURE

VIG Holding conducts proportional reinsurance business in the area of health insurance not similar to life techniques (NSLT). Some of this business includes riders for life insurance. These riders are allocated to the life segment due to their connection with the underlying life insurance policy. Another part of VIG Holding's life risk is due to annuity obligations arising from assumed proportional reinsurance business in the motor third party liability line of business.

VIG Holding's life underwriting risk was TEUR 5,044 as of 31 December 2022 (31/12/2021: TEUR 2,090).

<b>Life underwriting risk ("gross")</b>	<b>31 December 2022</b>	<b>31 December 2021</b>
<i>in EUR '000</i>		
Mortality risk	12	75
Longevity risk	0	1,709
Disability and morbidity risk	0	0
Life expense risk	0	174
Revision risk	0	697
Lapse risk	5,042	103
Life catastrophe risk	6	0
Diversification	-16	-669
<b>Life underwriting risk</b>	<b>5,044</b>	<b>2,090</b>

Life underwriting risk is of minor importance for VIG Holding and continues to be at a very low level as at 31 December 2022.

#### RISK CONCENTRATION

VIG Holding is not exposed to any risk concentration in life insurance, as this is of minor importance.

#### RISK MITIGATION

Risk mitigation takes place within the network of subsidiaries. No additional specific risk mitigation is necessary at the level of VIG Holding.

#### RISK SENSITIVITY

Due to the minor importance of the life underwriting risk for the risk profile of VIG Holding, no separate stress tests or sensitivity analyses were required.

### C.1.2 NON-LIFE UNDERWRITING RISK

The non-life underwriting risk is the risk that the insured losses and costs exceed revenues in the non-life business. It essentially consists of the following components:

- Risk of extreme loss events, particularly natural catastrophes
- Risk from unprofitable contracts due to inadequate premium pricing
- Risk from already incurred but insufficiently known or reserved claims
- Lapse risk (decrease of the profit contribution caused by a significant discontinuance of insurance policies)
- Expense risk

#### RISK EXPOSURE

Quantitative risk assessment is performed using an internal model, as the requirements and assumptions of the standard formula do not adequately reflect the risk profile of VIG Holding in the non-life area.

VIG Holding's non-life underwriting risk was TEUR 285,720 as of 31 December 2022 (31/12/2021: TEUR 206,565).

<b>Non-life underwriting risk ("gross")</b>	<b>31 December 2022</b>	<b>31 December 2021</b>
<i>in EUR '000</i>		
<b>Non-life underwriting risk</b>	<b>285,720</b>	<b>206,565</b>

Non-life underwriting risk rose compared to the previous year (38.3%), due to strong growth in direct business, inflation effects and higher reinsurance costs, among other things.

#### RISK CONCENTRATION

The acceptance of proportional reinsurance for motor third party liability business from subsidiary companies results in a correspondingly high volume in this line of business for VIG Holding. However, this does not lead to a concentration risk, as the insurance portfolio is very well geographically diversified across Central and Eastern Europe. Moreover, the conducted direct insurance business, particularly in the field of fire and other property, as well as the proportional reinsurance business in the field of NSLT health insurance additionally results in a good diversification between lines of business.

#### RISK MITIGATION

In addition to the aforementioned risk diversification, comprehensive underwriting guidelines (criteria for the acceptance of risks) effectively contribute to risk mitigation in direct business.

Reinsurance contracts are also used to reduce the non-life underwriting risk, particularly for large losses. Subsidiaries must base the selection of reinsurers on a security list defined by the VIG Insurance Group Reinsurance Security Committee (see section B.1.2). Reinsurance may only be ceded to reinsurers that are not on this list after individual approval by the Reinsurance Security Committee.

The influence of reinsurance cessions on the SCR can be seen in the table below for the most material VIG Holding non-life lines of business.

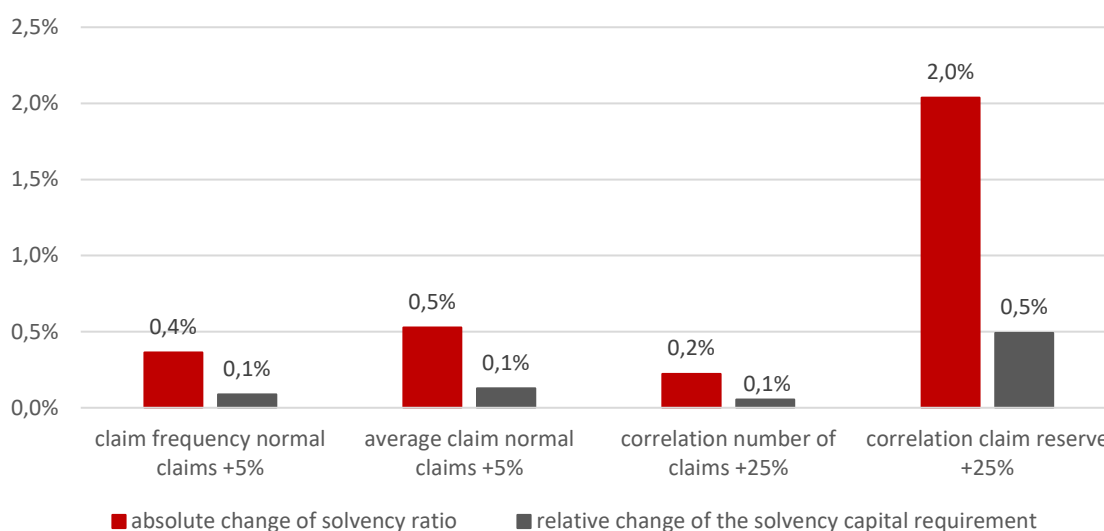
<b>Effect of reinsurance on non-life underwriting risk</b>	<b>SCR before reinsurance</b>	<b>SCR after reinsurance</b>	<b>Risk-mitigating effect</b>
<i>in EUR '000</i>			
Motor third party liability insurance (indirect business)	120,003	117,966	2,037
Fire and other property insurance (direct business)	238,364	138,968	99,396

## SENSITIVITY ANALYSIS FOR PARAMETERS IN NON-LIFE

The following stress tests were performed to assess the sensitivity to changes in the market environment:

- 5% increase in the claims frequency for normal claims<sup>1</sup> in all lines of business
- 5% increase in the average loss for normal claims in all lines of business
- Increased correlation of the number of claims between lines of business (+25% per correlation coefficient)
- Increased correlation of claim reserves between lines of business (+25% per correlation coefficient)

### NON-LIFE SENSITIVITIES



The analysis of sensitivities in the non-life underwriting business showed that the increase in correlation of claim reserves had the largest effect. In this case, the solvency ratio of VIG Holding decreases from 416.7% to 414.7%. Due to the good capital base and low capital requirement in the non-life area in comparison to the market risk, none of the calculated sensitivities indicate any potential danger to the solvency of VIG Holding.

### C.1.3 HEALTH UNDERWRITING RISK

Health underwriting risk is divided into SLT (similar to life techniques) and NSLT (not similar to life techniques) health underwriting risk depending on the policy terms and conditions. The NSLT health underwriting risk is calculated with the PIM, as the assumptions established in the standard formula do not adequately reflect the risk profile of VIG Holding in the non-life area. SLT health underwriting risk is not relevant for VIG Holding and health catastrophe risk is calculated using the standard formula.

<sup>1</sup> Excluding large losses, catastrophe and annuity losses

## RISK EXPOSURE

Health underwriting risk was TEUR 47,301 as of 31 December 2022 (31/12/2021: TEUR 42,648).

<b>Health underwriting risk ("gross")</b>	<b>31 December 2022</b>	<b>31 December 2021</b>
<i>in EUR '000</i>		
NSLT health underwriting risk	46,725	41,490
SLT health underwriting risk	0	0
Health catastrophe risk	2,123	3,947
Diversification	-1,548	-2,789
<b>Health underwriting risk</b>	<b>47,301</b>	<b>42,648</b>

There was an overall increase in health underwriting risk compared to the previous year (+10.9%), primarily due to inflation effects and segment changes in the area of NSLT health insurance.

### NSLT HEALTH UNDERWRITING RISK

NSLT health underwriting risk corresponds to accident insurance assumed by reinsurance and includes the classic non-life insurance underwriting risks. Losses can arise, for example, from accumulation events that include a large number of fatalities and injuries but are appropriately reinsured.

The NSLT health underwriting risk was TEUR 46,725 as of 31 December 2022 (31/12/2021: TEUR 41,490).

### HEALTH CATASTROPHE RISK

Three different catastrophe scenarios are considered for health catastrophe risk: mass accident, accident concentration and pandemic. The risk is adequately reinsured and is of minor importance due to its low materiality.

Health catastrophe risk was equal to TEUR 2,123 as of 31 December 2022 (31/12/2021: TEUR 3,947).

### RISK CONCENTRATION

The health underwriting risk is predominantly concentrated in the Austrian companies, which is reflected by the proportional reinsurance accepted by VIG Holding. This risk is of minor importance.

### RISK MITIGATION

Similar to the non-life sector, the mitigation measures mentioned above were also used here for risk mitigation. Almost all of the catastrophe risk is reinsured. As mentioned above, total health underwriting risk is of minor importance.

### RISK SENSITIVITY

Due to the minor importance of health underwriting risk for the risk profile of VIG Holding, no additional stress tests or sensitivity analyses were carried out.

## C.2 MARKET RISK

The market risk arises directly or indirectly from fluctuations in the level and volatility of market prices for assets, liabilities and financial instruments. The level of market risk is determined by changes in financial parameters, such as share prices and exchange rates, interest rates and real estate prices.

### RISK EXPOSURE

Based on the partial internal model, the market risk for VIG Holding was TEUR 2,463,444 as of 31 December 2022 (31/12/2021: TEUR 2,339,828). The following table shows the composition of the market risk.

<b>Market risk ("gross")</b>	<b>31 December 2022</b>	<b>31 December 2021</b>
<i>in EUR '000</i>		
Interest rate risk	87,329	18,037
Share price risk	2,072,343	1,974,535
Property risk	36,488	40,054
Spread risk	86,284	73,331
Market risk concentrations	74,519	78,202
Currency risk	654,587	683,201
Diversification	-548,105	-527,533
<b>Market risk</b>	<b>2,463,444</b>	<b>2,339,828</b>

Equity risk and currency risk are the material risks, as would be expected for a holding company with participations outside the Eurozone. The other risk types are only of minor importance. VIG Holding's market risk increased by TEUR 123,616 (+5.3%) compared to the previous year. The increase was due to the performance of participations in insurance companies and an increase in interest rate sensitivity.

### INTEREST RATE RISK

The interest rate risk results from all assets and liabilities whose value depends on changes in the yield curve or the volatility of interest rates. VIG Holding's interest rate risk was TEUR 87,329 as of 31 December 2022 (31/12/2021: TEUR 18,037). The increase was due to the change in the risk-free yield curve.

### EQUITY RISK

The equity risk stems from the level or volatility of the equities market prices. The amount of equity risk depends on all of the assets and liabilities whose values are subject to changes in equity prices.

VIG Holding had equity risk of TEUR 2,072,343 as of 31 December 2022 (31/12/2021: TEUR 1,974,535) and represents by far the largest individual risk among the market risks. This reflects the importance of participations in insurance companies in the VIG Holding portfolio. In the equity risk calculation, a distinction is made within the equity portfolio between type 1 equities (those listed on regulated markets within the EEA or OECD) and type 2 equities (all other equities). The portfolio of participations in insurance companies consists exclusively of strategic participations which are assessed separately from the classification into type 1 or type 2 equities.

### PROPERTY RISK

Property risk stems from all assets, liabilities and financial instruments whose value depends on the market prices of real estate or their volatility. In particular, this includes land, buildings, land rights as well as investments in real estate for own use.

In the view of VIG Holding, the assumptions of the standard formula concerning the volatility of real estate prices are not appropriate, since the geographic specifics of the real estate portfolio, in particular the Austrian real estate market, are not considered in the standard formula. For this reason, VIG Holding relies on a partial internal model to calculate property risk. In addition, a risk map is prepared during the annual risk inventory that analyses the degree of coverage of the property PIM. On the basis of the risk map, all material risks that affect the market value of property are covered

by the PIM. Based on the risk map all major risks that are not taken into account in the model are immaterial or are allocated to other risk categories in which they are already identified and are subject to effective control measures.

VIG Holding's property risk was TEUR 36,488 as of 31 December 2022 based on the internal model (31/12/2021: TEUR 40,054).

#### **SPREAD RISK**

The spread risk results from all assets, liabilities and financial instruments whose value depends on changes in the level or volatility of credit spreads over the risk-free yield curve. This also takes into account the default risk of financial instruments. The main factors determining the level of the spread risk are the average duration and the rating of the respective investment. Liabilities in the local currency of a central government or a central bank of an EU member state as well as liabilities of supranational institutions (ECB, EIB, EFSF, etc.) are considered to be risk-free exposures.

The spread risk of VIG Holding was TEUR 86,284 as of 31 December 2022 (31/12/2021: TEUR 73,331), making it a comparatively small part of the market risk.

#### **CURRENCY RISK**

The currency risk stems from all assets and liabilities whose value depends on changes in exchange rates. VIG Holding had a currency risk of TEUR 654,587 as of 31 December 2022 (31/12/2021: TEUR 683,201), making it VIG Holding's second-largest individual risk. The size is due to the fact that material participations are held in insurance companies outside the Eurozone, in particular in the Czech Republic and Poland.

#### **CONCENTRATION RISK**

The market concentration risk sub-module comprises those risks that are either caused by a low level of diversification within the investments or by a high exposure to the default risk of an individual securities issuer or a group of related issuers. Concentration risk includes investments that are taken into account in equity, spread and property risks. The investments that are included in the counterparty default risk calculation scope are not taken into account in the concentration risk.

Market concentration risk was TEUR 74,519 as of 31 December 2022 (31/12/2021: TEUR 78,202).

#### **RISK MITIGATION**

As the parent company of an international insurance group, VIG Holding is naturally exposed to equity and currency risk. The equity risk essentially results from the participations in the subsidiaries. These are all strategic in nature and short-term market fluctuations are therefore of minor importance and are consciously accepted.

Derivative financial instruments are used only to hedge dividend payments from the largest participations in insurance companies outside the Eurozone. When using these instruments, attention is paid to the selection of contractual partners.

#### **RISK SENSITIVITY**

Since this mainly involves market risk from strategic participations, no sensitivities have been determined.

### C.3 CREDIT RISK

The counterparty default risk is the risk of a loss or a disadvantageous change in the value of assets and financial instruments resulting from an unexpected default of a counterparty or debtor. A credit risk exists in both the investments, such as bonds, loans and deposits, as well as in other insurance and non-insurance receivables and cash deposits with banks.

VIG Holding uses the standard formula's risk classification. Therefore the following credit risk section deals exclusively with positions which are treated within the standard formula in counterparty default risk. The credit risk arising from investments is reflected under market risk and in particular the spread risk, which takes into account the credit risk of these positions.

#### RISK EXPOSURE

Counterparty default risk is the risk of a loss or a disadvantageous change in the value of assets resulting from an unexpected default of a counterparty or debtor within the next twelve months. VIG Holding's counterparty default risk was TEUR 127,910 as of 31 December 2022 (31/12/2021: TEUR 121,593).

For the determination of the risk-mitigating effect of reinsurance contracts, which is relevant for the calculation of the counterparty default risk, the simplification in accordance with Article 107 of the Delegated Regulation (EU) 2015/35 was applied.

<b>Counterparty default risk ("gross")</b>	<b>31 December 2022</b>	<b>31 December 2021</b>
<i>in EUR '000</i>		
Counterparty default risk on type 1 exposures	75,368	92,981
Counterparty default risk on type 2 exposures	61,269	35,158
Diversification	-8,728	-6,545
<b>Counterparty default risk</b>	<b>127,910</b>	<b>121,593</b>

Counterparty default risk rose slightly by TEUR 6,316 (+5.2%) compared to the previous year due to an increase in receivables.

#### RISK CONCENTRATION

Counterparty default risk plays a minor role for VIG Holding in terms of its amount. There is no significant concentration of receivables from a single counterparty.

#### RISK MITIGATION

VIG Holding has appropriate procedures and controls in place to reduce the risk arising from receivables from counterparties. In addition to the monitoring of the bank and reinsurer rating changes and the preparation of internal bank ratings, this includes measures such as a well-coordinated reinsurance programme, cooperation with renowned brokers in the large customer business, a large number of sales partners, and accounting and underwriting guidelines applicable throughout the Group. VIG Holding also uses many measures to limit the counterparty default risk with respect to policy holders. These include reminders, cooperation with collection companies and contract termination in the case of overdue payments. In addition, insurance protection is generally not applied or is reduced in the case of unpaid premiums payments.

#### RISK SENSITIVITY

Due to the minor importance of counterparty default risk for the risk profile of VIG Holding, no separate stress tests or sensitivity analyses were carried out.



#### C.4 LIQUIDITY RISK

The liquidity risk is the risk arising from the lack of marketability of investments in order to meet current short-term or long-term obligations. This includes, for example, losses arising due to asset-liability mismatches.

##### RISK EXPOSURE

The liquidity risk of the company is also considered low in light of the measures described below. Finance and Accounting also prepares an annual liquidity plan for VIG Holding in cooperation with the Treasury incl. ALM department.

##### RISK CONCENTRATION

There is no significant risk concentration with respect to the liquidity risk.

##### RISK MITIGATION

Liquidity requirements are regularly analysed as part of the asset and liability management (ALM). These analyses, together with clear investment requirements (limit systems) and a conservative investment policy, help to appropriately manage liquidity risk. The Treasury incl. ALM department performs regular monitoring of cash flows and reports at least quarterly on liquidity changes in the Liquidity Committee. This solid liquidity management ensures VIG Holding's liquidity. In addition to providing a view of liquidity, the implemented ALM process also sheds light on the relationship between investments and liabilities. In view of this, the liquidity risk of the company is considered low.

##### RISK SENSITIVITY

Due to the existing ongoing monitoring of the liquidity requirement and the associated assessment of the liquidity risk as low, no separate stress tests or sensitivity analyses were carried out.

##### EXPECTED PROFIT INCLUDED IN FUTURE PREMIUMS

The total amount of expected profit included in future premiums (EPIFP) calculated in accordance with Article 260 (2) of Commission Delegated Regulation (EU) 2015/35 was TEUR 83,469 as of 31 December 2022 (31/12/2021: TEUR 39,084).

## C.5 OPERATIONAL RISK

Operational risk is the risk of loss resulting from the inadequacy or failure of internal processes, employees or systems, or external events. Operational risk also includes legal and compliance risks.

### RISK EXPOSURE

Operational risk is assessed in VIG Holding both quantitatively using the standard formula and qualitatively on the basis of a severity/frequency analysis. Based on the standard formula, operational risk was TEUR 46,872 as of 31 December 2022 (31/12/2021: TEUR 43,146).

<b>Operational risk</b>	<b>31 December 2022</b>	<b>31 December 2021</b>
<i>in EUR '000</i>		
<b>Operational risk</b>	<b>46,872</b>	<b>43,146</b>

Operational risk according to the standard formula is mainly dependent on the amount of earned premiums or technical provisions. However, this assessment does not provide a precise explanation of the causes and associated effects of operational risk. For this reason, operational risk is divided into further sub-categories and additionally assessed qualitatively. Operational risk is assessed at the level of VIG Holding in accordance with internal Group requirements in order to obtain a more precise profile of operational risk. The twelve qualitatively assessed operational sub-risk categories are:

#### BUSINESS INTERRUPTION RISK

Business interruption risk is the risk of loss due to serious business interruptions that cannot be eliminated in the day-to-day business process.

#### KNOWLEDGE CONCENTRATION RISK

Knowledge concentration risk is the risk that important duties are performed by a person who has exclusive knowledge or special skills.

#### INSUFFICIENT HUMAN RESOURCES

Insufficient human resources can have a negative impact on business processes, which can lead to a higher failure rate, a decrease in performance or financial damages.

#### HARDWARE AND INFRASTRUCTURE RISK

The hardware and infrastructure risk results from the use of outdated or inadequate methods and facilities as well as the insufficient maintenance and repair of the company's hardware and infrastructure.

#### IT SOFTWARE AND SECURITY RISK

The IT software and security risk results from the use of outdated or inadequate software, as well as the insufficient maintenance and support of the company's software and IT security systems.

#### MODEL AND DATA QUALITY RISK

The model and data quality risk is the risk of loss due to badly designed or improperly used models whose results are used for business decisions.

#### IT DEVELOPMENT RISK

The IT development risk is the risk of loss due to shortcomings, errors or mistakes in the conception and implementation of IT solutions.

#### PROJECT RISK

Project risk is the risk that major projects cannot deliver the desired results in time, lack in quality or exceed the budget.

#### COMPLIANCE RISK

Compliance risk is the risk of non-compliance with legal (statutory and regulatory) requirements.

#### RISK OF EXTERNAL CRIME

The risk of external crime is the risk of loss due to criminal acts by third parties. Examples include robbery, theft, break-in, and all types of fraud.

#### PROCESS AND ORGANISATION RISK

Process and organisation risk is the risk of loss due to inadequate or failed internal processes.

#### HUMAN ERROR

Human errors are unintended errors or wrong decisions of employees within the scope of their professional activities.

Operational risks are assessed based on the severity and frequency assessments. For this purpose, the residual risk is assessed, i.e. the risk that remains after taking into account the risk-mitigating effects of controls. The expected loss is assessed on a scale from insignificant to severe, depending on existing own funds, whereas a loss is considered severe if it exceeds 1% of the own funds of VIG Holding. The frequency is based on a scale from rare to frequent. Losses occurring at most once in ten years are considered rare and losses occurring more than a hundred times a year are considered frequent.

The operational risks of VIG Holding are in the low to middle range on average.

#### RISK CONCENTRATION

There are no material risk concentrations in VIG Holding with regard to operational risks.

#### RISK MITIGATION

In order to monitor operational risks, VIG Holding has an adequate internal control system (ICS) which contributes to the mitigation of existing risks. The individual operational risks identified for the business processes are regularly checked for relevance using a standardised process and the effectiveness of the implemented controls is monitored. Remediation measures are implemented if new operational risks or control weaknesses are identified (see section B.4). Emergency plans are in place for material operational risks that cannot be reduced by internal controls, in particular risks relating to business interruption and loss of employees. These are regularly checked and tested for their relevance.

#### RISK SENSITIVITY

Due to the minor importance of operational risk for the quantitative risk profile of VIG Holding and the generally qualitative nature of the operational risks, no separate stress tests or sensitivity analyses were carried out.

## C.6 OTHER MATERIAL RISKS

### C.6.1 STRATEGIC RISK

Strategic risk is the risk of an adverse business development as a result of poor business and investment decisions, inadequate communication and implementation of company objectives or the lack of the company's adaptability to the economic environment, as well as contradictory business objectives.

#### RISK EXPOSURE

Investments in participations play a major role in VIG Holding's strategic risk. The extensive exchange of information between management and the functional departments of VIG Holding will ensure that risks and opportunities are adequately analysed and well-founded decisions are taken on this basis before investments are made. VIG Insurance Group's decentralised organisation, based on its multi-brand policy and multi-channel distribution, has a risk-reducing effect in this connection (diversification).

Complete, reliable information is needed to make sound strategic decisions. VIG Insurance Group has many experts who provide the Managing Board and the management of the local companies with in-depth analyses to help them in their decision-making. The clear communication of the company's objectives ensures that the business decisions taken are implemented across the Group. Members of the VIG Holding Managing Board also hold positions on VIG insurance company Supervisory Boards in order to ensure local implementation of Group objectives. The pursuit of the multi-branding strategy, combined with the high degree of autonomy of the local companies, ensures that strategic risk is strongly diversified.

VIG Insurance Group makes use of the potential in the countries of Central and Eastern Europe (CEE). While the economic catch-up process lost significant momentum during the financial crisis, the Group is still convinced of the long-term potential of these markets. The balanced position in mature and growth-oriented markets will ensure the long-term success of the company in coming years. Despite a generally good strategic orientation, companies in these countries may also experience adverse business development due to political tensions or changes in the law.

The "VIG 25" strategic programme addresses the current strategic challenges. VIG 25 defines three strategic priorities and uses targeted activities aimed at optimising, expanding and extending its business model in these three areas to ensure greater customer proximity and more value creation.

Aside from the effects of the Russia-Ukraine war, the significant increase in inflation in the year just ended and exit from the low interest rate phase with sudden increases in the interest rate environment currently present the biggest challenges for insurance companies and groups.

Taking into account the above factors, the strategic measures that were implemented and the current geopolitical environment, VIG Holding has a medium level of strategic risk.

#### **RISK CONCENTRATION**

There are no significant risk concentrations within VIG Holding with regard to strategic risk.

#### **RISK MITIGATION**

The clear communication of the company's strategy and objectives ensures that the business decisions taken are implemented across the Group. Giving Managing Board members and 2<sup>nd</sup> level managers of VIG Holding positions in the supervisory boards of the subsidiaries ensures that the Group's objectives are implemented locally. The pursuit of the multi-branding strategy, combined with the high degree of autonomy of the local companies, ensures that strategic risk is strongly diversified.

#### **RISK SENSITIVITY**

No specific stress tests or sensitivity analyses were carried out due to the existing comprehensive measures for mitigating risk.

### **C.6.2 REPUTATION RISK**

Reputation risk is the risk of negative changes in business due to damage to a company's reputation. A loss of reputation can shake customer confidence and the confidence of investors and the company's own personnel and lead to financial losses. The causes include, among other things, inadequate advice when products are sold, inadequate customer service, inadequate disclosures to investors, negative media coverage, in particular in connection with sustainability or other non-financial risks, or reputation damage that spreads from one company to another.

#### **RISK EXPOSURE**

VIG Holding's duties primarily focus on the strategic management of VIG Insurance Group. As a result of the multi-brand strategy used and the discreet public image associated therewith, the reputation risk for VIG Holding as a solo company is classified as low.

As a result of the multi-brand strategy within VIG Insurance Group, reputation losses and associated economic losses are usually limited to a single location. The risk that reputation losses of individual companies spread to other companies is therefore classified as low. VIG Holding's reputation risk as a whole is also considered to be low in view of the risk-mitigating measures outlined below.

#### **RISK CONCENTRATION**

There are no material risk concentrations in VIG Holding with regard to reputation risk.

#### **RISK MITIGATION**

Whether employees are of good reputation and integrity (proper) is already taken into account when they are hired. In particular, special training is provided for employees in sales and employees who act as company representatives. Furthermore, the Code of Business Ethics provides clear rules of conduct that must be followed by all employees. In addition to these staff-related measures, the company's risk-mitigating measures also include investing in advertisement in order to attract new customers and to ensure the long-term loyalty of existing customers to the company, a professional complaint management system to deal with customer matters, and a strong social and cultural commitment (e.g. the Social Active Day, events, sponsorship of art and culture).

Furthermore, the Investor Relations and Communication & Marketing departments of VIG Holding are responsible for a clear external communication in order to provide information for investors and make statements on the media coverage.

#### **RISK SENSITIVITY**

Due to the minor importance of reputation risk for the risk profile of VIG Holding, no separate stress tests or sensitivity analyses were carried out.

### **C.6.3 INTANGIBLE ASSET RISK**

Intangible asset risk reflects the risk of a loss or adverse change in the value of intangible assets.

#### **RISK EXPOSURE**

The intangible assets had a value of TEUR 24,184 as of 31 December 2022 based on UGB/VAG accounting principles (31/12/2021: TEUR 21,456). VIG Holding follows a conservative approach by reporting intangible assets with a value of zero in the economic balance sheet. VIG Holding therefore has no solvency capital requirement for this area.

#### **RISK CONCENTRATION**

There is no risk concentration for intangible asset risk in VIG Holding.

#### **RISK MITIGATION**

Intangible assets are periodically tested for impairment. No risk mitigation measures are needed.

## RISK SENSITIVITY

Due to the minor importance of intangible asset risk for the risk profile of VIG Holding, no separate stress tests or sensitivity analyses were carried out.

## C.7 ANY OTHER INFORMATION

The following additional topics were or are important for the risk profile of VIG Holding or VIG Insurance Group during the financial year just ended and the beginning of 2023 (after the balance sheet date) and are therefore briefly discussed below.

### SUSTAINABILITY RISKS

For VIG Insurance Group, sustainability risks are risks with potential effects in ESG areas (environment, society and governance) that could negatively affect the overall performance of the Group or that arise due to VIG Group activities and have negative effects on the environment or society.

Events or changes in conditions in the environmental or social areas could have a negative effect on VIG Insurance Group's net assets, financial position and results of operations, as well as its reputation. These include, among others:

- climate change (climate risks),
- potentially stricter requirements for sustainability in the area of environmental protection,
- political measures to promote sustainable investment, and
- stricter requirements for a sustainable social environment (labour standards, occupational safety and working conditions, compensation, etc.).

A structured approach for the identification and assessment of sustainability risks in VIG Insurance Group was established to integrate sustainability risks into existing risk management processes. VIG Holding includes sustainability risks in its regular risk management processes (e.g. ORSA). The sustainability risks at the VIG Holding level are classified in the low to medium range.

## MACROECONOMIC RISKS

As a participant in the market, the business activities of VIG Insurance Group are influenced by the development of macroeconomic factors, such as the rate of unemployment, GDP and inflation.

2022 saw a significant rise in inflation in almost all markets in which the VIG Insurance Group operates. Global economic growth was also subdued by the ongoing COVID-19 pandemic and the Russia–Ukraine conflict. Inflation trends are being closely monitored by VIG and potential impacts are analysed using scenario analyses, enabling appropriate responses to an ever-changing environment to be taken.

## RISKS RELATED TO THE RUSSIA–UKRAINE CONFLICT

VIG Insurance Group is represented by three insurance companies in the Ukrainian market. The companies are mainly active in the western regions of the country, so business operations have thus far only been directly impacted to a limited extent.

Further development of the conflict and the potential for further escalation of sanctions and countermeasures could further worsen the implications for financial markets and the economy in general. This could create a number of risks for VIG Holding that are addressed and handled as part of its sustainable risk management.

## EARTHQUAKE IN SOUTH-EASTERN TÜRKIYE AND PARTS OF SYRIA

An earthquake of magnitude 7.8 on the Richter scale occurred in the early morning hours of 6 February 2023, accompanied by numerous aftershocks of up to 7.5 on the Richter scale in subsequent hours. Overall, the earthquakes affected a region with a radius of around 400 kilometres, including the cities of Gaziantep, Adana, Antakya, Kahramanmaraş, Malatya, Kilis, Osmaniye, Diyarbakır, Adıyaman and Şanlıurfa in Türkiye, and Aleppo, Idlib, Homs and Hama in Syria. Several thousand buildings collapsed, causing thousands of injuries and tens of thousands of deaths. Small tsunami waves were observed on the east coast of Cyprus as a result of the earthquakes, but did not cause any damage and a tsunami warning was issued in Italy.

VIG offers insurance coverage in this region, primarily through its insurance company RaySigorta in Türkiye, which mainly focuses on the less affected western part of Türkiye. The insurance penetration for the affected area in Türkiye is lower than in the western part of the country and residential buildings are covered by the state TCIP pool. According to preliminary estimates, the Group is expecting a gross loss of approximately EUR 100.0 million (before reinsurance). Currently, net loss cannot be estimated, but VIG has concluded reinsurance programmes for natural disasters.

## BANKING CRISIS IN THE FIRST QUARTER OF 2023

Silicon Valley Bank (SVB) collapsed on 10 March 2023, causing subsequent turmoil in the financial market. The increased loss of confidence in individual institutions also caused financing difficulties for the bank Credit Suisse, which was followed on 19 March 2023 by an announcement of a takeover of Credit Suisse by its competitor UBS. The rapid rescue was coordinated with the Swiss National Bank, was welcomed by other central banks (e.g. FED, ECB) and temporarily calmed financial markets. A high level of uncertainty nevertheless remains with regard to the stability of the banking world due to the events.

Given these failures and uncertainties and the current macroeconomic situation (inflation, risk of a recession), there is a risk that the financial market could experience high levels of volatility, even in the near future, and that other banks could fail and the financial market could be put under pressure. The situation is therefore being monitored closely in order to react to any adverse developments at an early stage.

## D VALUATION FOR SOLVENCY PURPOSES

This section deals with the valuation of assets and liabilities for the purpose of assessing the solvency position in accordance with VAG. In addition to the balance sheet complying with the Austrian Commercial Code (UGB) and Austrian Insurance Supervision Act (VAG), an economic balance sheet has to be prepared. The economic balance sheet should include a market-consistent valuation of all assets and liabilities. Market-consistent valuation should be used to determine the amount of own funds the Group has available to cover the solvency capital requirement.

The next section presents the valuation of the most important items in the economic balance sheet, the assets on the asset side and technical provisions and other liabilities on the liabilities side.

### D.1 ASSETS

Investments are an important part of the asset side of the balance sheet and represent the insurance company's capital market investments. In accordance with Solvency II, these are generally recognised at market value or fair value that can be achieved in an arm's length transaction.

The following table shows the assets of VIG Holding based on market values in comparison to the UGB/VAG values (in EUR '000):

Assets	Solvency balance sheet	UGB/VAG	Difference
in EUR '000			
Intangible assets	0	24,184	-24,184
Deferred tax assets	64,134	0	64,134
Property, plant and equipment held for own use	84,721	23,767	60,954
Investments (other than assets held for index-linked and unit-linked policies)	11,100,853	6,050,211	5,050,641
Property	568,585	133,209	435,376
Shares in affiliated companies, including participations	9,526,439	4,886,930	4,639,508
Shares	0	0	0
Bonds	665,438	690,654	-25,216
Collective investments undertakings	1,641	1,378	263
Derivatives	0	0	0
Deposits other than cash equivalents	338,750	338,040	710
Assets held for unit-linked and index-linked policies	0	0	0
Loans and mortgages	154,512	147,115	7,397
Reinsurance recoverables	246,597	255,290	-8,693
Receivables from insurance companies and intermediaries	122,791	89,577	33,215
Deposit receivables	1,218,466	1,218,466	0
Other receivables, short-term bank deposits and other assets	1,192,216	1,237,619	-45,403
<b>Total</b>	<b>14,184,289</b>	<b>9,046,228</b>	<b>5,138,061</b>

Intangible assets are not recognised in the solvency balance sheet, as the criteria for recognition are not met.

Property, plant and equipment held for own use are recognised in the solvency balance sheet at fair value, which also serves as the basis for the real estate PIM. The fair value is determined by certified experts on a regular basis.

Starting 01/01/2019, the requirements of IFRS 16 were taken into account when determining the fair values of the lease agreements included.

Under UGB/VAG, real estate or land (for own and third party use) is valued at cost, and buildings at cost less depreciation and any write-downs.

In accordance with Article 10 of Delegated Regulation (EU) 2015/35, the following valuation hierarchy is applied to investments in calculating the Solvency II valuation:



First, the current market price or stock exchange price, if available, is used. If there is no active market, the fair value is determined by comparison with financial instruments as comparable as possible for which a market price on an active market exists. For this purpose, the following options are available:

- **Mark-to-market:**  
The comparable financial instrument is listed on an active market (market price). A market is considered to be an active market if an adequate volume of transactions for identical or similar assets or groups of assets take place at an adequate frequency to make price information continuously available.
- **Mark-to-model:**  
The investments can be valued reliably and consistently using recognised valuation models. As a rule, several present value methods are used. That is, future cash flows are discounted to the valuation day with an appropriate yield curve. The spreads depend on the type of security and its rating. Ratings are available from certified rating agencies, and the second-best rating is used. Collateral and guarantees are taken into account when determining internal ratings for bonds. If this is not possible, the investments are classified as “not rated”. The input parameters for the models used for valuing securities are generally observable on the market and are available via the applicable data providers.

If no benchmark value can be used, there is the option of carrying out the valuation on the basis of amortised cost and alternative valuation methods.

Apart from insurance or reinsurance companies, shares in affiliated companies, including participations, are valued using the Solvency II valuation hierarchy.

VIG Holding's participations in insurance and reinsurance companies are valued using the adjusted equity method applying the valuation hierarchy specified in Article 13 of Delegated Regulation (EU) 2015/35. Since the shares of the participations in insurance or reinsurance companies are not listed on an active market, they are recognised using the share of their Solvency II own funds (excluding subordinated liabilities). Any own funds effects resulting from potential use of the volatility adjustment or transitional measures were taken into account for each company during valuation.

Bonds and equities are valued at fair value, which was determined on the basis of market prices. For securities that are classified under IFRS as “held to maturity”, a revaluation to fair value was made. Securities which were classified in the IFRS categories “available for sale” or “trading investments” and those in which the “fair value option” was used in accordance with IFRS, were recognised in the solvency balance sheet at the corresponding IFRS value.

Under UGB/VAG, shares and other non-fixed-income securities and shares in affiliated companies are valued using the strict lower-of-cost-or-market principle (strenges Niederstwertprinzip). Bonds, other fixed-income securities and participations are valued using the less strict lower-of-cost-or-market principle (gemildertes Niederstwertprinzip).

Collective investment undertakings (investment funds) are recognised at fair value in the economic balance sheet. The fair value is determined largely based on current market prices. For unlisted fund investments, generally accepted valuation models are used for determining the fair value. These may be general present value models that are applied in accordance with the regulatory requirements of the fund or, in the case of real estate funds, valuations made by qualified and recognised real estate appraisers.

For loans and mortgages, the fair value is recognised in the economic balance sheet. In this case, the fair value is determined based on mark-to-model prices. Unlike the economic balance sheet, loans and mortgages are valued at the nominal amount of the outstanding receivables for the UGB/VAG balance sheet.

The valuation of the reinsurance recoverables, i.e. the reinsurers' share of the technical provisions, results from the best-estimate calculation.

Deposit receivables arise from accepted reinsurance business.

Receivables from insurance companies and intermediaries relate to receivables from policy holders, insurance intermediaries and insurance companies. Other receivables mainly include receivables from interest and rents, receivables from tax authorities and tax allocations. Most of the receivables have short maturities. Initial recognition is at cost and subsequent valuation is at amortised cost. Accrued interest is shown in the economic balance sheet for the market values of securities.

In accordance with UGB/VAG, sufficient provisions are set up for doubtful receivables and deducted from their nominal amounts.

The obligations due to long-term leases refer to leases for IT equipment (copiers, printers, telephone system, etc.), car leases and office buildings.

The other receivables, short-term bank deposits and other investments mainly consist of cash in banks and other overnight money/time deposits. Due to their short-term nature, not their present or fair value but the IFRS book value is used in the economic balance sheet.

For derivative financial instruments, relevant valuation models (similar to a Black-Scholes model) are used that take into account the particular design of the derivative. Where these derivatives relate to specific hedges of risks associated with individual securities, hedging relationships are recognised for these securities and derivatives in accordance with UGB/VAG.

Deferred tax assets on temporary differences between earnings under corporate law and taxable earnings are capitalised. The tax rate chosen for this is 20.7% (2021: 22.5%) for the financial year onwards. The decrease in the tax rate is due to the 2022 eco-social tax reform and the associated gradual reduction of the corporate income tax rate.

Deferred tax assets on the asset side of the economic balance sheet result from temporary differences of individual balance sheet items between solvency and tax accounting in accordance with Austrian tax law. A deferred tax rate of 20.7% (2021: 22.5%) is applied from the financial year onwards. Most deferred tax assets have their origin in investments and in non-technical provisions.

In some cases, the valuations use estimates that VIG Holding is aware of and include uncertainties that are consciously taken into account in the valuation.

No other asset classes than those in the economic balance sheet are used. No material changes were made to the recognition and valuation bases or estimates in the reporting period.

## D.2 TECHNICAL PROVISIONS

### D.2.1 VALUE OF THE TECHNICAL PROVISIONS

The following table shows the technical provisions under Solvency II of VIG Holding as of 31 December 2022, split into lines of business and into best estimate, risk margin and reinsurance recoverables.

#### SUMMARY OF TECHNICAL PROVISIONS BY LINES OF BUSINESS

	Best estimate	Risk margin	Technical provisions	Reinsurance recoverables*	Technical provisions after reinsurance
in EUR '000					
Life insurance (excl. SLT health insurance and index-linked and unit-linked insurance)	56,270	11	56,281	0	56,281
SLT health insurance	-167	77	-90	0	-90
Index-linked and unit-linked insurance	0	0	0	0	0
Non-life insurance	1,275,976	65,076	1,341,052	239,564	1,101,487
Non-SLT health insurance	277,970	19,947	297,917	7,032	290,884
<b>Total amount of life and non-life insurance</b>	<b>1,610,049</b>	<b>85,110</b>	<b>1,695,159</b>	<b>246,597</b>	<b>1,448,563</b>

\* After adjusting for counterparty default risk

### D.2.2 VALUATION OF THE TECHNICAL PROVISIONS

Details on the basis of the valuation of technical provisions, the assumptions and the methods used are provided below. In addition, other relevant information is presented in respect of the valuation and the basic data flows.

#### BASES

The economic balance sheet is based on market values, and liabilities are therefore also valued based on their market values. Since there is no liquid market for underwriting liabilities, the sum of a best estimate and a risk margin is used for the economic value of the liabilities.

The valuation measures satisfy the principle of proportionality, which ensures that valuations are close to market value and that an appropriate result is achieved. Simplifications are carried out in relation to the nature, scope and complexity of the risk.

The best estimate corresponds to the probability-weighted average of the discounted future cash flows. This is the present value of the random values of future obligations.

When calculating the risk margin it must be ensured that the value of the technical provisions corresponds to the amount that insurance and reinsurance companies would demand to assume and fulfil the insurance and reinsurance obligations.

The reinsurance recoverables correspond to the best estimate of the reinsurance liabilities less an adjustment for the counterparty default risk of the reinsurers.

All calculations were performed as of 31 December 2022 taking into account the claim reserves and the portfolio at that date, without including future new business.

#### **METHODOLOGY FOR CALCULATING THE BEST ESTIMATE IN LIFE INSURANCE**

The best estimate is the economic value of the underwriting liabilities. The expected present value of insurance liabilities is determined on the basis of current and credible information and realistic assumptions. For discounting purposes the official risk free rate yield curve published by EIOPA is applied.

All incoming and outgoing cash flows of the insurance liabilities are taken into account in the calculation of the best estimate. These include all payments to policy holders and beneficiaries, all expenses incurred for acquisitions, management, investment management and claims settlement and all premium payments and all cash flows resulting from premiums.

#### **METHODOLOGY FOR CALCULATING THE BEST ESTIMATE IN NON-LIFE INSURANCE**

The best estimate for non-life insurance consists of two modules, the claims reserve and the premium reserve.

For accepted reinsurance business, the best estimates are calculated separately for all VIG companies by each line of business and loss year.

To determine the best estimate claim reserve, standard chain ladder, Munich chain ladder, Cape Cod and the additive method, amongst others, are applied to both payments and incurred claims data before the decision is made for the most plausible methodology. This approach guarantees that different settlement patterns and all data are recorded and analysed. The best estimate of the premium reserve is determined by a combined ratio method.

#### **METHODOLOGY FOR CALCULATING THE RISK MARGIN**

The calculation of the risk margin is based on the assumption that the entire portfolio of insurance and reinsurance obligations is transferred to another insurance or reinsurance company, called the reference undertaking. Therefore, the risk margin corresponds to the cost of capital necessary to provide eligible own funds equal to the solvency capital requirement.

The Solvency II standard formula uses a cost of capital approach for calculating the risk margin. In this case, the solvency capital requirement is multiplied at any future point in time with a cost of capital of 6% and then discounted and aggregated. For discounting the risk-free basic interest rate is used.

#### **METHOD FOR CALCULATING REINSURANCE RECOVERABLES**

In the economic balance sheet, the best estimate is calculated before reinsurance receivables are deducted. Recoverable amounts from reinsurance contracts are valued separately and reported on the asset side of the economic balance sheet.

Counterparty default risk is taken into account when calculating the reinsurance recoverables. This is intended to take into account the expected loss resulting from the default of the counterparty. The calculation is performed separately for each counterparty and for each line of business. The calculation is based on an assessment of the probability of default of the counterparty and the ability of the counterparty to recover from this.

In non-life insurance, the counterparty default risk is determined separately for the premium and claim reserves.

#### **METHODOLOGY FOR CALCULATING THE EXPECTED PROFIT INCLUDED IN FUTURE PREMIUMS (EPIFP)**

The expected profit included in future premiums comes from the gains or losses included in the future expected premiums for existing insurance and reinsurance contracts. Methods similar to those used to calculate the best estimate of the premium reserve are applied.

#### **SIMPLIFICATIONS**

The UGB/VAG balance sheet reserve is only used to a small extent as the best estimate for individual lines of business and companies in the indirect business. The reasons for this are too short of a history, data limitations, too specific or non-material business so that an appropriate estimate is not available.

In the calculation of the risk margin, future SCRs are calculated in proportion to the change in the best estimate.

Recoverable amounts from reinsurance contracts in the direct business are adjusted proportionally to the booked reserves. The default risk is also taken into account. Due to the limited data available and because of the low amount of reinsurance business ceded, the reinsurance recoverables in the indirect business are not revalued.

#### **COMPARISON TO THE PREVIOUS YEAR**

Both the best estimate and risk margin have increased compared to the previous year. Technical provisions increased 5% overall after reinsurance. The increase in the best estimate was due to the growth in direct business, refinement of the model and additional reinsurance contracts and was partially offset by the current level of interest rates. The risk margin increased due to the increase in the underlying solvency capital requirement. The reinsurance contracts for life insurance were revalued without simplifications for the first time as at 31 December 2022. VIG Holding assumes life insurance risks in special cases for capital management within the Group.

#### **UNCERTAINTY IN THE BEST ESTIMATE CALCULATION**

Since most companies have a data and revaluation history that shows stable development, the degree of uncertainty in the best estimate calculation is satisfactory.

#### **ADJUSTMENTS AND APPLICATION OF TRANSITIONAL MEASURES**

VIG Holding does not use volatility adjustments as specified in Article 77d of Directive 2009/138/EC, and also does not use matching adjustments as specified in Article 77b of Directive 2009/138/EC. Furthermore, neither the temporary risk-free yield curve in accordance with Article 308c of Directive 2009/138/EC nor the temporary withdrawal in accordance with Article 308d of Directive 2009/138/EC are applied.

### D.2.3 REVALUATION OF TECHNICAL PROVISIONS

UGB/VAG valuation of technical provisions is based on a precautionary principle, while Solvency II strives for market-consistent valuation.

#### REVALUATION AND ADJUSTMENT OF TECHNICAL PROVISIONS

	Solvency balance sheet	UGB/VAG	Difference
<b>in EUR '000</b>			
Technical provisions	1,695,159	1,885,047	-189,888
Other technical provisions	0	3,904	-3,904

Under UGB/VAG, claim reserves are built for individual claims (RBNS) and additional lump-sum reserves are set up for IBNR losses. Experience has shown that this leads to run-off profits. These future run-off profits can be seen when comparing the technical provisions under Solvency II and UGB/VAG.

The best estimate for the premium reserve has no direct counterparty in the UGB/VAG balance sheet. Although unearned premiums, the cancellation reserve and provision for expected losses include corresponding cash flows, all of the future portfolio cash flows are not systematically recognised. In particular, no future profits or losses are reported under UGB/VAG.

This difference in valuation approach usually causes the Solvency II best estimate to be smaller than the technical provision under UGB/VAG. In addition, the equalisation provision and terror pool are missing in the economic balance sheet.

### D.3 OTHER LIABILITIES

Other liabilities are further provisions and liabilities of the company. This applies in particular to provisions for severance payments and pensions, subordinated liabilities and deferred tax liabilities. Here, too, a Solvency II valuation consistent with market value is used to prepare the solvency balance sheet. The table below shows the valuation of other liabilities for VIG Holding based on market values compared to the values calculated in accordance with UGB/VAG (in EUR '000):

Significant components of other liabilities	Solvency balance sheet	UGB/VAG	Difference
<b>in EUR '000</b>			
Contingent liabilities	44,152		44,152
Provisions other than technical provisions	124,331	126,348	-2,017
Pension payment liabilities	50,726	70,598	-19,872
Deposits from reinsurers	0	0	0
Deferred tax liabilities	218,709		218,709
Liabilities to financial institutions	227,965	227,965	0
Financial liabilities other than liabilities to financial institutions	360,065	503,836	-143,771
Liabilities to insurance companies and intermediaries	160,013	158,791	1,222
Liabilities to reinsurers	10,909	12,131	-1,222
Liabilities (retail, not insurance)	489,918	530,028	-40,109
Subordinated liabilities	1,569,557	1,684,400	-114,843
Other liabilities not reported elsewhere	732	732	0

The contingent liabilities concern the contingent liabilities for “ancillary own funds” for borrowing by and a letter of comfort for affiliated companies mentioned in A.4.

The **provisions other than technical provisions** mainly include the provision for anniversary bonuses, provision for unused vacation, provision for variable salary components, a provision for customer service and marketing and IT provisions. These are valued using the International Financial Reporting Standards (IAS 37), which is a reasonable approximation of the Solvency II valuation principles.

The pension payment liabilities (provisions for severance and provisions for pensions) were calculated in accordance with recognised actuarial rules using the Actuarial Association of Austria (AVÖ) 2018-P Pension insurance calculation principles taking into account the principles currently in effect (IAS 19).

The provisions for severance payments and pensions are calculated using a wage growth rate of:

- Wage growth rate (2023): 8.5%
- Wage growth rate (2024): 6.5%
- Wage growth rate (2025): 3.5%
- Wage growth rate (2026): 2.5%
- Wage growth rate (starting 2027): 2.0% p.a.;

(previous year: 2.25%) and discount rate of 3.60% (previous year: 1.00%).

The percentage of assets with respect to the defined-benefit plan assets is 60.45% for severance (previous year: 55.15%) and 6.06% for pensions (previous year: 4.49%).

The provisions for severance payments and pensions are calculated in the economic balance sheet in accordance with the provisions of IAS 19, while the projected unit credit method with 7-year average interest rate is used in the UGB/VAG balance sheet. A portion of the direct pension obligations are administered as an occupational group insurance plan following conclusion of an insurance contract in accordance with the provisions of §§ 93 to 97 VAG. In terms of outsourced severance obligations, the difference between provisions for severance payments formed in accordance with the requirements of corporate law and the balances at insurance companies is recognised in the balance sheet.

Deferred tax liabilities are recognised in accordance with IAS 12 for the entire economic balance sheet and thus contain the taxes payable in the future that arise from revaluations as at the current date. A deferred tax rate of 20.7% (previous year: 22.5%) is applied.

Subordinated liabilities and financial liabilities other than liabilities to banks consist of supplementary capital bonds issued in the form of securities and lease agreements for property, plant and equipment held for own use. Subordinated liabilities are recognised in the UGB/VAG balance sheet at their book value and in the economic balance sheet at their market values (dirty value, therefore including accrued interest). The requirements of IFRS 16, which apply starting 01/01/2019, are observed for the market values of lease agreements.

Liabilities to insurance companies and intermediaries are made up of liabilities to policy holders, insurance intermediaries and other insurance companies.

In addition to liabilities to affiliated companies and participations, the amounts reported in liabilities (retail, not insurance) include tax liabilities and social security liabilities.

Other liabilities not reported elsewhere consist of deferred income and are recognised at their IFRS value for reasons of materiality.

In some cases, the valuations use estimates that VIG Holding is aware of and include uncertainties that are consciously taken into account in the valuation.

No other classes than those in the economic balance sheet are used. No changes were made to the recognition and valuation bases or estimates in the reporting period. VIG Holding has no significant lease liabilities.

#### D.4 ALTERNATIVE METHODS FOR VALUATION

In the economic balance sheet, an alternative valuation method is used for the following assets and liabilities: own-use and third-party use real estate, term deposits as well as operating and office equipment.

Please refer to section D.1 with regard to the valuation methods applied to real estate and loans in the solvency balance sheet. The value of all real estate in the economic balance sheet excluding right-of-use assets in accordance with IFRS 16 is determined on the basis of expert opinion. This valuation is repeated on a regular basis. The location of the property and its occupancy rate if it is a rented property, amongst other factors, are used as assumptions for this valuation. This valuation method was chosen, since the UGB/VAG methods, i.e. valuation using amortised cost, are not appropriate for an economic balance sheet.

Term deposit accounts are recognised in the economic balance sheet at their nominal values.

For reasons of materiality and practicality, operating and office equipment is recognised using the amortised cost, i.e. the cost of acquisition, reduced by straight-line amortisation resulting from the customary useful life. The economic balance sheet thus takes the same approach as both the UGB/VAG and IFRS financial statements.

No other alternative valuation methods are used for assets or liabilities.

The alternative valuation methods are periodically checked for appropriateness.

#### D.5 ANY OTHER INFORMATION

There is no other significant information on the valuation of assets and liabilities for solvency purposes to be reported in the year under review.



## E CAPITAL MANAGEMENT

In addition to the capital management process and guidelines for the distribution of own fund items, VIG Holding’s capital management mainly consists of the classification of own funds. These are derived from the valuation of the economic balance sheet and represent the amount available to the company to cover the Solvency Capital Requirement (SCR).

### E.1 OWN FUNDS

This section deals with the composition and management of VIG Holding own funds. First, the capital management process is discussed and the possibility of distributions of own fund items is discussed. Then the individual own fund items are presented for each quality class (tier) along with their eligibility for the solvency capital requirement and the minimum capital requirement.

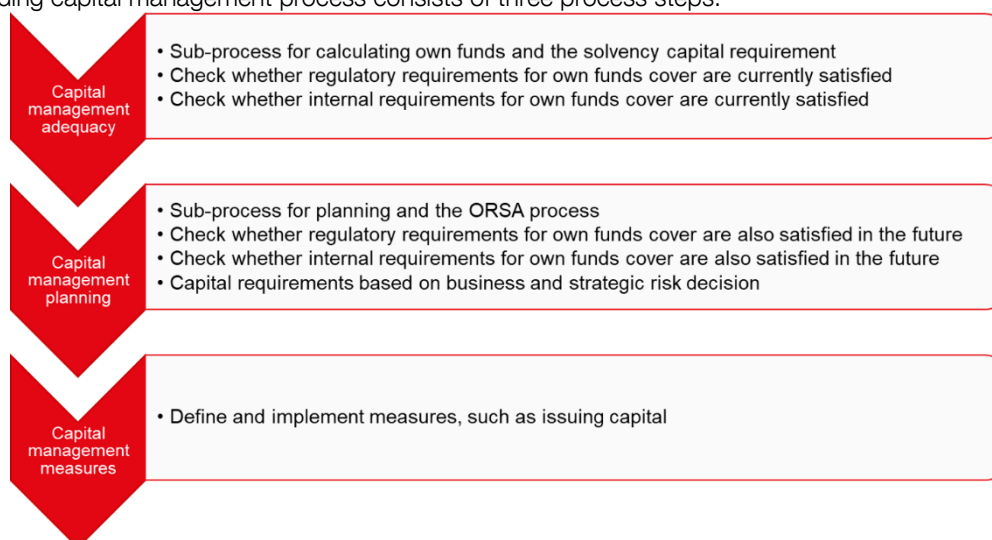
Management of own funds serves to ensure the compliance with legal and internal standards for quality and quantity in order to meet the solvency capital requirement and minimum capital requirement. VIG Holding’s solid capitalisation ensures the ongoing presence of the insurance operations in the future.

#### E.1.1 CAPITAL MANAGEMENT PROCESS

Capital management serves to maintain the best possible capital structure in order to ensure the financial flexibility and independence of VIG Holding. It is based on the following guiding principles:

- Ensuring ongoing existence and an adequate capital base
- The ability to fulfil obligations to policy holders and other beneficiaries at any time
- Continuous dividend payment to shareholders
- Active management of the amount and quality of the capital base, taking into account the internal economic view, from the perspective of UGB/VAG, IFRS and Solvency II, and the rating
- Maintaining an appropriate capital structure in order to optimise the cost of capital
- Considering the minimum solvency rate decided by the Managing Board and documented in the business and risk strategy

The VIG Holding capital management process consists of three process steps:



### **CAPITAL MANAGEMENT ADEQUACY**

The first step involves the monitoring of the current own funds situation. This step is part of the process for calculating own funds and the solvency capital requirement and is therefore performed on a quarterly basis. The preparation of the economic balance sheet and the calculation of the own funds is done by the Finance and Accounting department, while the solvency capital requirement is determined by the Enterprise Risk Management or the risk management function.

In any case, the result is updated when the current capital base of VIG Holding has changed, such as when supplementary capital bonds are called, repurchased prior to maturity or newly issued.

In addition, the adequacy of the quality and quantity of the current own funds is checked.

In this context, it is checked whether the eligibility limits of Article 82 of the Delegated Regulation (EU) 2015/35 are met. The compliance with the internal risk tolerance, which is a minimum solvency ratio of 125%, is also checked.

If the capital base is considered insufficient, internal company measures are implemented, depending on the scope of the situation.

### **CAPITAL MANAGEMENT PLANNING**

While the current own funds situation is considered in the previous step of the process, this step involves monitoring the future own funds situation. This step is part of the planning and ORSA process and is thus performed annually in its regular form, and ad hoc if necessary.

The analysis of the future capital base refers to the own funds situation at the end of each year during the planning period (3 years).

The future own funds are also checked for adequacy in terms of quality and quantity. Compliance with the risk tolerance is also checked over the planning period.

The monitoring of the own funds situation in accordance with Solvency II in the ORSA process is performed by the risk management function.

The results of this review are documented in the ORSA report. If the capital base is considered insufficient, the above-mentioned measures are taken.

The future solvency ratio is determined during the annual ORSA process based on the projected own funds and capital requirements. The compliance with the risk tolerance is also checked over the planning period.

### **CAPITAL MANAGEMENT MEASURES**

The results from the previous steps as well as the business, investment and risk strategy serve as the basis for capital management measures. In addition, the own funds must also satisfy the risk tolerance defined internally in addition to the regulatory principles. It may therefore be necessary to take capital measures even though the company is adequately covered from a regulatory perspective.

Possible measures are clearly and understandably documented in the medium-term capital management plan. Furthermore, the expected impact on the capital and risk situation are described. The responsibilities with respect to the implementation, approval and further monitoring of measures are defined.

The medium-term capital management plan is prepared annually by Treasury incl. ALM in collaboration with Enterprise Risk Management and Finance and Accounting as part of the planning and ORSA process and updated if necessary. The observation period covered by the medium-term capital management is as long as the planning process, but an extended observation period is applied in the case of supplementary capital. This is to ensure that all terminated volumes of supplementary capital bonds are taken into account in assessing the capital. This is particularly true with respect to the transitional measures applied to supplementary capital.

After a review by the responsible committees, VIG Holding may carry out the following types of capital issues, among others, in accordance with the medium-term capital management plan: a capital increase and an issue of supplementary capital bonds.

### **E.1.2 DISTRIBUTIONS FROM OWN FUND ITEMS**

In VIG Holding, dividends on the share capital are paid as distributions from the own fund items.

In this process, all existing shares have the same dividend rights and claims. The amount of the dividend is determined by the amount of profit from the previous financial year. The profit is determined in accordance with the accounting principles of the UGB, taking into account the provisions of the VAG. The net retained profit therefore consists of the result from ordinary activities, less taxes, changes in reserves and retained profits.

The dividend payment amount for a financial year is specified in the Managing Board's dividend payment proposal and follows the specified dividend policy, which provides for a dividend distribution in the range of 30 to 50% of the Group profit after taxes and non-controlling interests. This proposal is presented to the Supervisory Board for approval. The General Meeting is bound to the approved proposal in its resolution on the appropriation of the profit.

Based on the current legal situation, the General Meeting may exclude the profit from the distribution in whole or in part. The VAG stipulates that the General Meeting may not approve the distribution if it would result in a shortfall in coverage of the solvency capital requirement (§ 170 (2) VAG).

If the coverage of the solvency capital requirement that is required under § 278 VAG is no longer permanently guaranteed, the suspension of the dividend payment is specified as a measure in the recovery plan which has to be submitted to the FMA. Until the company is adequately capitalised again and a permanent coverage of the SCR can be guaranteed again, no dividend payment can be made. The observation period is defined here as the planning period.

### **E.1.3 CLASSIFICATION OF OWN FUNDS**

VIG Holding own funds are described and their classification is explained in detail below. VIG Holding has the following own funds:

- Share capital
- Revaluation reserves, including capital reserves, retained earnings and other reserves (equalisation reserve)
- Share premiums attributable to share capital
- Subordinated liabilities in the form of supplementary capital bonds

The own funds are divided into basic own funds and ancillary own funds and classified in three quality classes (tiers) based on their features. The classification is based primarily on the following six criteria:

1. Permanent availability
2. Subordination of the total amount
3. Sufficient maturity
4. No repayment incentives
5. No compulsory ongoing costs
6. No charges

The following categorisation results from these criteria:

- Tier 1: only basic own funds, which largely meet all six criteria.
- Tier 2: basic own funds if it is not permanently available and ancillary own funds if it meets all six criteria.
- Tier 3: all remaining basic and ancillary own funds.

Own fund items by tier	Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
<i>in EUR '000</i>					
Share capital	132,887	132,887	0	0	0
Share premiums attributable to share capital	1,994,216	1,994,216	0	0	0
Reconciliation reserve	6,927,227	6,927,227	0	0	0
Subordinated liabilities	1,569,557	0	245,137	1,324,420	0
<b>Total own funds</b>	<b>10,623,887</b>	<b>9,054,331</b>	<b>245,137</b>	<b>1,324,420</b>	<b>0</b>

VIG Holding had TEUR 10,623,887 in available own funds as of 31 December 2022 (31/12/2021: TEUR 9,987,236). Equity and supplementary capital according to the UGB/VAG was TEUR 5,526,850 on the same date (31/12/2021: TEUR 5,190,774). The most significant difference between this and own funds in the economic balance sheet is due to revaluation. This affects both the asset and the liability side of the balance sheet. The individual own fund items are described in more detail below. More than 85.2% of VIG Holding's own funds are classified as restricted Tier 1 capital.

Change in own funds broken down by tier	Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
<i>in EUR '000</i>					
Own funds 31/12/2022	10,623,887	9,054,331	245,137	1,324,420	0
Own funds 31/12/2021	9,987,236	8,523,920	301,882	1,161,435	0
<b>Difference</b>	<b>636,651</b>	<b>530,411</b>	<b>-56,745</b>	<b>162,985</b>	<b>0</b>

Own funds increased by TEUR 636,651 during the reporting period. This was mainly the result of the increase in the reconciliation reserve, which reflects the increase in the excess of assets over liabilities in the solvency balance sheet.

The excess of assets over liabilities includes deferred tax assets and liabilities. As discussed in sections D.1 and D.3 above, deferred tax assets and liabilities in the solvency balance sheet are due to temporary measurement differences between the solvency and tax balance sheets and result in a negative tax balance of TEUR 154,575 (31/12/2021: TEUR 88,307).

## BASIC OWN FUNDS

VIG Holding's basic own funds consist of share capital, the share premium account, capital reserves, the revaluation reserve incl. retained earnings and subordinated liabilities. The supplementary capital bonds are reported under subordinated liabilities.

## SHARE CAPITAL

VIG Holding holds only paid-in share capital. The paid-in share capital is classified as Tier 1 capital since it satisfies the necessary characteristics for Tier 1 capital. VIG Holding has no other share capital categories such as callable share capital or treasury shares.

#### SHARE PREMIUM ACCOUNT

VIG Holding's share premiums are classified as Tier 1 capital since they satisfy the necessary characteristics for Tier 1 capital.

#### RECONCILIATION RESERVE

The reconciliation reserve is composed of the following:

<b>Reconciliation reserve</b>	<b>31 December 2022</b>	<b>31 December 2021</b>
<i>in EUR '000</i>		
Excess of assets over liabilities	9,230,368	8,689,306
Foreseeable dividends, distributions and charges	-176,038	-165,386
Other basic own fund items	-2,127,104	-2,127,104
<b>Total</b>	<b>6,927,227</b>	<b>6,396,816</b>

#### SUBORDINATED LIABILITIES

The supplementary capital of VIG Holding falls under subordinated liabilities. It consists of one hybrid capital bond and three supplementary capital bonds that satisfy the criteria for restricted Tier 1 and for Tier 2.

VIG Holding has no own fund items with Tier 1 quality that are of the type "paid-in subordinated member accounts of mutual insurance associations", "paid-in preferred shares and related share premium account" or "paid-in subordinated liabilities" and there are therefore no disclosures necessary regarding the capital adjustment mechanisms for these own fund items.

VIG Holding does not hold ancillary own funds.

#### ELIGIBILITY OF OWN FUNDS

The eligibility of VIG Holding's own fund items for covering the solvency and minimum capital requirements is checked, taking into account the current solvency capital requirement and minimum capital requirement (MCR). The quantity and quality of current own funds eligible to meet the SCR and MCR is checked.

#### QUANTITY OF OWN FUNDS

The assessment of the quantity of own funds is performed based on the fundamental requirements in § 174 VAG for own funds covering the SCR and in § 193 (1) VAG for own funds covering the MCR. This means that the following limits must be met:

- Solvency ratio  $\geq 100\%$
- MCR ratio  $\geq 100\%$

The Managing Board has defined a risk tolerance with a minimum solvency ratio of 125%. An additional review is therefore conducted:

- Solvency ratio  $\geq 125\%$

#### QUALITY OF OWN FUNDS

The own fund items of all quality levels (Tier 1, 2 and 3) are eligible for covering the SCR, but are subject to quantitative limits under Article 82 (1) of Delegated Regulation 2015/35:

- Tier 1 own funds  $\geq$  50% SCR
- Tier 3 own funds  $<$  15% SCR
- Tier 2 + Tier 3 own funds  $\leq$  50% SCR

Only own fund items with quality levels of Tier 1 and Tier 2 are eligible for covering the MCR. In accordance with Article 82 (2) of Delegated Regulation 2015/35, these eligible own funds are subject to the following quantitative limits:

- Tier 1 own funds  $\geq$  80% MCR
- Tier 2 own funds  $\leq$  20% MCR

In accordance with Article 82 (3) of Delegated Regulation 2015/35, own fund items with Tier 1 quality have to satisfy additional quantitative limits. Total paid-in preferred shares, including the share premium account, with Tier 1 quality and paid-in subordinated liabilities with Tier 1 quality (e.g. due to transitional rules) may not represent more than 20% of the total Tier 1 own funds.

In the case of VIG Holding this means:

- Tier 1 ancillary own funds  $\leq$  20% Tier 1 own funds;

Compliance with the eligibility limits in Article 98 of the Directive is also taken into account in this connection.

<b>Eligible own funds to meet the SCR</b>	<b>31 December 2022</b>	<b>31 December 2021</b>
<i>in EUR '000</i>		
Tier 1	9,299,468	8,825,802
Tier 2	1,267,909	1,161,435
Tier 3	0	0
<b>Total</b>	<b>10,567,377</b>	<b>9,987,236</b>

The eligible own funds to cover the SCR are TEUR 10,567,377. A value of TEUR 56,510 in Tier 2 own funds was deducted when the limits were checked on 31/12/2022. The eligible own funds for covering the SCR therefore increased by TEUR 580,140 compared to the previous year.

<b>Eligible own funds to meet the MCR</b>	<b>31 December 2022</b>	<b>31 December 2021</b>
<i>in EUR '000</i>		
Tier 1	9,299,468	8,825,802
Tier 2	126,791	120,198
Tier 3	0	0
<b>Total</b>	<b>9,426,259</b>	<b>8,946,000</b>

The eligible own funds to cover the MCR are TEUR 9,426,259. An amount of TEUR 1,197,629 in Tier 2 own funds was deducted when the limits were checked. This is because by definition Tier 2 own funds eligible for covering the MCR may not exceed 20% of the MCR. The eligible own funds for covering the MCR therefore increased by TEUR 480,259 compared to the previous year.

## E.2 SOLVENCY CAPITAL REQUIREMENT AND MINIMUM CAPITAL REQUIREMENT

The own funds requirements of the VAG require insurance companies to periodically calculate a solvency capital requirement (SCR) and a minimum capital requirement (MCR). These determine the amount of the own funds that the company requires in order to ensure an ongoing compliance with all obligations.

The solvency capital requirement of the insurance company corresponds to a required level of capital that will put the insurance company in a position to absorb unforeseen losses. The SCR is calculated using risk-based models and represents the capital that would be needed to cover a loss occurring only once in 200 years.

Only the net tax liability in the solvency balance sheet is reported for the loss-absorbing capacity of deferred taxes. The tax assets and liabilities are with the same tax authority and can actually be offset. No other adjustments are made to the loss-absorbing capacity of deferred taxes.

The minimum capital requirement represents the minimum level of the own funds that an insurance company must maintain under all circumstances.

Both key figures (SCR and MCR) are determined either on the basis of a Europe-wide standard formula or – if approved by the supervisory authority – using a (partial) internal model. VIG Holding has an approved partial internal model for the non-life and property areas. The solvency capital calculations are therefore calculated and reported using this partial internal model.

### E.2.1 SOLVENCY CAPITAL REQUIREMENT

Based on the calculated solvency capital requirement and own funds, VIG Holding had the following SCR coverage ratio as of 31 December 2022:

<b>Solvency capital requirement and its coverage for VIG Holding based on PIM</b>	<b>31 December 2022</b>	<b>31 December 2021</b>
<i>in EUR '000</i>		
Solvency II own funds to meet the SCR	10,567,377	9,987,236
Solvency capital requirement (SCR)	2,535,818	2,403,963
<b>Solvency ratio</b>	<b>416.7%</b>	<b>415.4%</b>

The following table shows the composition of the solvency capital requirement by risk module calculated based on the partial internal model taking into account statutory transitional measures.

<b>Description of the solvency capital requirement based on the PIM</b>	<b>31 December 2022</b>	<b>31 December 2021</b>
<i>in EUR '000</i>		
Basic solvency capital requirement	2,604,377	2,449,124
Market risk	2,463,444	2,339,828
Counterparty default risk	127,910	121,593
Life underwriting risk	5,044	2,090
Health underwriting risk	47,301	42,648
Non-life underwriting risk	285,720	206,565
Intangible asset risk	0	0
Operational risk	46,872	43,146
Loss-absorbing capacity of deferred taxes	-115,430	-88,307
<b>Solvency capital requirement</b>	<b>2,535,818</b>	<b>2,403,963</b>

VIG Holding's solvency capital requirement was TEUR 2,535,818 as of 31 December 2022 (31/12/2021: TEUR 2,403,963). Compared to the previous year, there was an increase of TEUR 131,855 (+5.5%) in the SCR that was due to the change in risks discussed in sections C.1-C.5 above.

No undertaking-specific parameters in accordance with Article 104 (7) of Directive 2009/138/EC were used in the calculation. For the determination of the risk-mitigating effect of reinsurance contracts, which is relevant for the calculation of the counterparty default risk, the simplification in accordance with Article 107 of the Delegated Regulation (EU) 2015/35 was applied.

## E.2.2 MINIMUM CAPITAL REQUIREMENT

The MCR is determined using a factor-based approach, in particular on the basis of technical provisions, written premiums and the solvency capital requirement (SCR). The technical provisions, risk capital and premiums are divided into lines of business, multiplied by factors specified by the regulator and aggregated. The MCR's lower limit is 25% of the SCR and its upper limit is 45% of the SCR. The lower limit specified by the SCR currently applies to VIG Holding, so that the MCR is one quarter of the SCR. The minimum solvency ratio is equal to the own funds eligible for covering the MCR divided by the MCR. The following MCR coverage ratio was calculated for 31 December 2022:

<b>Minimum capital requirement and its coverage for VIG Holding based on PIM</b>	<b>31 December 2022</b>	<b>31 December 2021</b>
<i>in EUR '000</i>		
Solvency II own funds to meet the MCR	9,426,259	8,946,000
Minimum capital requirement (MCR)	633,955	600,991
<b>MCR coverage ratio</b>	<b>1,486.9%</b>	<b>1,488.5%</b>

The difference between the own funds that can be used to cover the SCR and the own funds available to cover the MCR results from a regulatory limit for the eligibility of Tier 2 own fund items. Tier 2 own funds can only cover 20% of the MCR. Any amount above is not deemed eligible to cover the MCR.

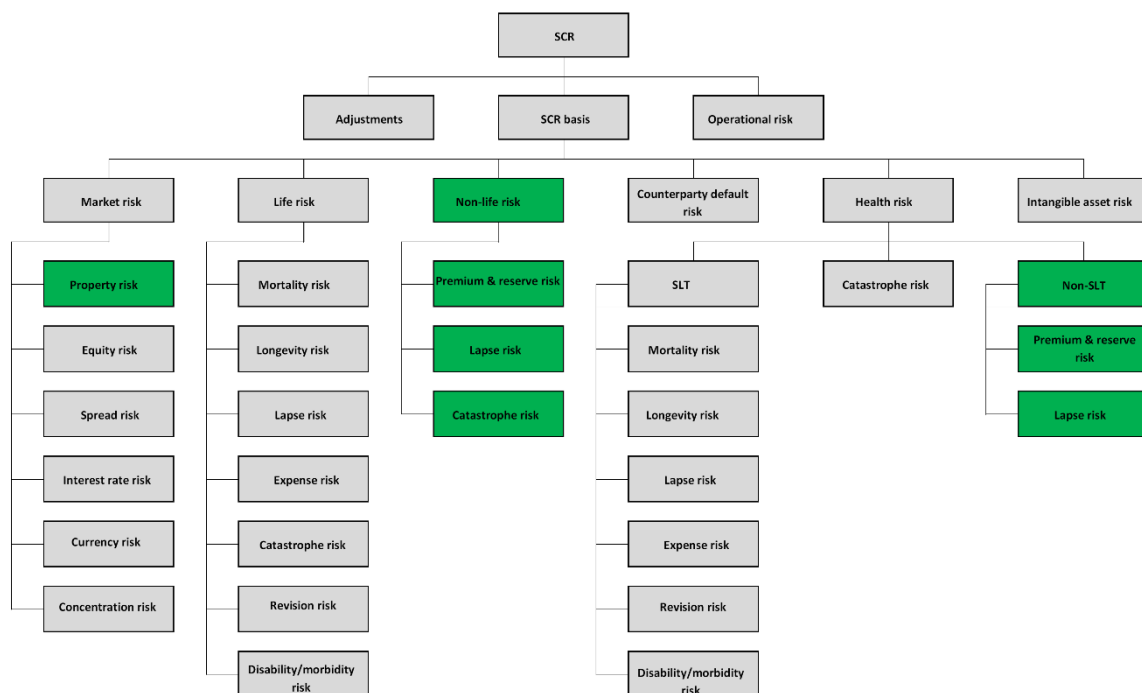
## E.3 USE OF THE DURATION-BASED EQUITY RISK SUB-MODULE IN THE CALCULATION OF THE SOLVENCY CAPITAL REQUIREMENT

VIG Holding does not use the duration-based equity risk sub-module specified in Article 304 of Directive 2009/138/EC when calculating the solvency capital requirement.



## E.4 DIFFERENCES BETWEEN THE STANDARD FORMULA AND ANY INTERNAL MODEL USED

The following chart shows the risk modules prescribed by Solvency II (“SCR tree”). The risk categories calculated with partial internal models are highlighted in green colour:



The aggregation and diversification effects follow the specifications of the standard formula. The partial internal model is integrated by replacing the results of the risk modules concerned. The application, structure and methodology of the model are described in the sections below.

### E.4.1 THE NON-LIFE MODEL

The model covers all material underwriting risks in the non-life insurance business and is used in VIG Holding for several purposes, including the following:

- To support key business decisions using scenario calculations for key performance indicators (premium growth, loss ratios, loss/expense ratio, underwriting result, etc.) and their expected volatility (risk); and decision-making (e.g. the purchase of reinsurance)
- To calculate the solvency capital requirement
- To forecast the solvency capital requirement based on the planning

The calculated solvency capital requirement corresponds to the value-at-risk for a change in own funds with a confidence level of 99.5% over a period of one year.

The model allows a one-year modelling of the underwriting result in the non-life insurance business using a Monte Carlo simulation. In this simulation, a multitude of possible scenarios is generated based on a random number generator. A possible realisation of profit and loss items is estimated (premiums, losses, etc.) for each scenario on gross and net of reinsurance level. These scenarios are based on a simulated portfolio development (parametrisation of ongoing business, new business, cancellations). The model takes into account the three main categories of risk: premium, reserve and catastrophe risk. Overall, the generated scenarios allow for the identification of risk drivers and analysis of possible extreme events.

Diversification effects in the model between the sub-modules stem directly from the Monte Carlo simulation and from the implemented correlation structures that use copulas to take into account all material dependencies that occur in reality. This includes, among other things, the correlation of portfolio performance, losses and reserve levels between the modelled lines of business.

In comparison to the standard formula, the model allows for a more granular segmentation of individual lines of business, making premium and reserve risk modelling more differentiated, which is tailored to the in-house portfolio characteristics. Therefore, the model is also used for steering of the company including business planning and reinsurance purposes. The adequacy of the data and methods is reviewed annually as part of the comprehensive validation. If necessary, the modelling can be adapted quickly to changes in the risk profile. Detailed information on the validation process and governance system for the PIM is provided in section B.3.2.

#### E.4.2 THE PROPERTY MODEL

The property PIM consists of three sub-models, with only two sub-models currently being used due to the existing portfolio:

- Directly held real estate, holding companies and (under IFRS 16) leased property
- Real estate funds
- Non-profit housing societies (currently no companies in scope)

A uniform approach is used for the modelling for each sub-model, with the PIM covering all property risks in the portfolios of the VIG insurance companies using the model. The model results are used for the following purposes, among others:

- To provide assistance if significant changes occur in the business and risk strategy with respect to real estate investment
- To calculate the solvency capital requirement
- To analyse the effects on the risk profile of possible real estate purchases or sales

The solvency capital requirement calculated using the partial internal model is the sum of the solvency capital requirements for the sub-models. It corresponds to the Value-at-Risk of the total value of the real estate portfolio with a confidence level of 99.5% over the period of one year. The SCR calculated based on the property PIM replaces the property risk calculated with the standard formula. Further aggregation is performed according to the specifications of the standard formula. Diversification effects therefore arise between the individual assets within the sub-models as well as between the property risk and other market risks within the aggregation method specified in the standard formula.

The property PIM is based on a simulation of changes in the parameters relevant to the value of the property portfolio. Based on the valuation methods typically used in the different markets (property appraisals, net asset value, discounted cash flow), the sub-models differ in the choice of the simulated parameters.

Compared to the standard formula, which is based on an index of the real estate market of the United Kingdom, the internal model takes into account, amongst other things, the geographical specifics of the in-house real estate portfolio. Residential real estate was not included in the calibration of the standard formula, but makes up a significant portion of the Group-wide portfolio. Due to their many years of experience with property investments, the companies that use the PIM have their own databases, valuation knowledge and specific market knowledge.

The adequacy of the data and methods used in the PIM is reviewed annually as part of the validation. Detailed information on the validation process and governance system for the PIM is provided in section B.3.2.

### E.5 NON-COMPLIANCE WITH THE MINIMUM CAPITAL REQUIREMENT AND NON-COMPLIANCE WITH THE SOLVENCY CAPITAL REQUIREMENT

VIG Holding complies with the minimum capital requirement and solvency capital requirement.

## E.6 ANY OTHER INFORMATION

No other information on capital management is to be reported in the reporting period.

## NOTICE

This report includes forward-looking statements based on current assumptions and estimates that were made by the management of VIENNA INSURANCE GROUP AG Wiener Versicherung Gruppe to the best of its knowledge. Disclosures using the words “expected”, “target” or similar formulations are an indication of such forward-looking statements. Forecasts related to the future development of the Company are estimates made on the basis of information available as of the date this report went to press. Actual results may differ from the forecasts if the assumptions underlying the forecast prove to be wrong or if unexpectedly large risks occur.

Amounts were rounded to improve readability and, where not indicated otherwise, are shown in thousands of euro (TEUR/EUR '000). Calculations, however, are done using exact amounts, including digits not shown, which may lead to rounding differences when rounded amounts and percentages are added.

The report was prepared with great care to ensure that all information is complete and accurate. The possibility of rounding, type-setting or printing errors, however, cannot be ruled out completely.

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#### EDITOR AND MEDIA OWNER:

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Schottenring 30, 1010 Vienna  
Company register: 75687 f  
Commercial Register of Vienna  
Data Processing Register code (DVR No.): 0016705

## ANNEX

### Documents in the annex

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Affiliated companies and participations of VIG Holding

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Public disclosure VIG Holding - Quantitative Reporting Templates (QRT) for the solvency and financial condition report of individual undertakings

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S.02.01.02 Balance sheet

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S.05.01.02 Premiums, claims and expenses by line of business

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S.05.02.01 Premiums, claims and expenses by country

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S.12.01.02 Life and SLT health technical provisions

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S.17.01.02 Non-life technical provisions

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S.19.01.21 Non-life insurance claims information

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S.23.01.01 Own funds

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S.25.02.21 Solvency capital requirement - for companies using the standard formula and partial internal model

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S.28.01.01 Minimum capital requirement - only life insurance activities, or only non-life insurance activities, or only reinsurance activities

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## AFFILIATED COMPANIES AND PARTICIPATIONS OF VIG HOLDING

The following material participations existed in VIG Holding on 31 December 2022 (§ 238 UGB):

<b>Company</b>	<b>Direct interest in capital (%)</b>
<b>Affiliated companies</b>	
Akcionarsko društvo za zivotno osiguranje Wiener Städtische Podgorica, Vienna Insurance Group, Podgorica	100.00
ASIGURAREA ROMANEASCA - ASIROM VIENNA INSURANCE GROUP S.A., Bucharest	88.77
ATBIH GmbH, Vienna	68.97
BCR Asigurari de Viata Vienna Insurance Group S.A., Bucharest	93.98
Beesafe Spolka z Ograniczona Odpowiedzialnoscia, Warsaw	77.27
BTA Baltic Insurance Company AAS, Riga	100.00
Ceská podnikatelská pojist'ovna, a.s., Vienna Insurance Group, Prague	100.00
Compania de Asigurari "DONARIS VIENNA INSURANCE GROUP" Societate pe Actiuni, Chisinau	99.99
Compensa Life Vienna Insurance Group SE, Tallinn	100.00
Compensa Towarzystwo Ubezpieczen Na Zycie Spolka Akcyjna Vienna Insurance Group, Warsaw	84.14
Compensa Towarzystwo Ubezpieczen Spolka Akcyjna Vienna Insurance Group, Warsaw	76.01
Compensa Vienna Insurance Group, akcine draudimo bendrove, Vilnius	100.00
DONAU Versicherung AG Vienna Insurance Group, Vienna	74.24
ELVP Beteiligungen GmbH, Vienna	100.00
Foreign limited liability company "InterInvestUchastie", Minsk	99.95
GLOBAL ASSISTANCE D.O.O. BEOGRAD, Belgrade	50.00
Global Assistance Polska Spolka z ograniczona odpowiedzialnoscia, Warsaw	30.77
GLOBAL ASSISTANCE SERVICES s.r.o., Prague	100.00
GLOBAL ASSISTANCE SERVICES SRL, Bucharest	40.00
GLOBAL ASSISTANCE SLOVAKIA s.r.o., Bratislava	40.00
GLOBAL ASSISTANCE, a.s., Prague	60.00
Global Services Bulgaria JSC, Sofia	50.00
Insurance Company Vienna osiguranje d.d., Vienna Insurance Group, Sarajevo	100.00
INSURANCE ONE-SHAREHOLDER JOINT-STOCK COMPANY BULSTRAD VIENNA INSURANCE GROUP EAD, Sofia	100.00
InterRisk Towarzystwo Ubezpieczen Spolka Akcyjna Vienna Insurance Group, Warsaw	100.00
InterRisk Versicherungs-AG Vienna Insurance Group, Wiesbaden	100.00
INTERSIG VIENNA INSURANCE GROUP Sh.A., Tirana	89.98
Joint Stock Insurance Company WINNER LIFE - Vienna Insurance Group Skopje, Skopje	100.00
Joint Stock Insurance Company WINNER-Vienna Insurance Group, Skopje	100.00
KOMUNÁLNA poisťovna, a.s. Vienna Insurance Group, Bratislava	100.00
KOOPERATIVA poisťovna, a.s. Vienna Insurance Group, Bratislava	94.37
Kooperativa, pojist'ovna, a.s. Vienna Insurance Group, Prague	95.84
KUPALA Belarusian-Austrian Closed Joint Stock Insurance Company, Minsk	52.34
LVP Holding GmbH, Vienna	100.00
OMNIASIG VIENNA INSURANCE GROUP S.A., Bucharest	99.54
Private Joint Stock Company "Insurance Company "USG", Kiev	6.90
Private Joint-Stock Company "INSURANCE COMPANY "KNIAZHA LIFE VIENNA INSURANCE GROUP", Kiev	97.94
PRIVATE JOINT-STOCK COMPANY "UKRAINIAN INSURANCE COMPANY "KNIAZHA VIENNA INSURANCE GROUP", Kiev	90.56
Ray Sigorta Anonim Sirketi, Istanbul	12.67
RISK CONSULT Sicherheits- und Risiko-Managementberatung Gesellschaft m.b.H., Vienna	41.00
SIA "Global Assistance Baltic", Riga	33.33
SIGMA INTERALBANIAN VIENNA INSURANCE GROUP Sh.A., Tirana	89.05
Stock Company for Insurance and Reinsurance MAKEDONIJA Skopje - Vienna Insurance Group, Skopje	94.36

<b>Company</b>	<b>Direct interest in capital (%)</b>
<b>Affiliated companies</b>	
twinformatics GmbH, Vienna	20.00
Vienna Insurance Group Polska Spolka z ograniczona odpowiedzialnoscia, Warsaw	51.43
Vienna International Underwriters GmbH, Vienna	100.00
Vienna Life Towarzystwo Ubezpieczen na Zycie S.A. Vienna Insurance Group, Warsaw	100.00
Vienna-Life Lebensversicherung AG Vienna Insurance Group, Bendorf	100.00
VIG AM Real Estate, a.s., Prague	100.00
VIG Hungary Holding B.V., Amsterdam	55.00
VIG Hungary Holding B.V. II, Amsterdam	55.00
VIG IT - Digital Solutions GmbH, Vienna	100.00
VIG Magyarország Befektetési Zártkörűen Működő Részvénytársaság, Budapest	55.00
VIG Management Service SRL, Bucharest	52.08
VIG Properties Bulgaria AD, Sofia	99.97
VIG RE zajišťovna, a.s., Prague	55.00
VIG Services Ukraine, LLC, Kiev	6.98
VIG Türkiye Holding B.V., Amsterdam	100.00
VIG-CZ Real Estate GmbH, Vienna	90.00
Wiener Osiguranje Vienna Insurance Group a.d., Banja Luka	100.00
Wiener osiguranje Vienna Insurance Group dionicko društvo za osiguranje, Zagreb	97.82
WIENER STÄDTISCHE OSIGURANJE akcionarsko društvo za osiguranje Beograd, Belgrade	100.00
WIENER STÄDTISCHE VERSICHERUNG AG Vienna Insurance Group, Vienna	90.82
Wiener Towarzystwo Ubezpieczen Spolka Akcyjna Vienna Insurance Group, Warsaw	100.00
<b>Participations</b>	
Erste Asset Management GmbH, Vienna	0.76
Wiener Börse AG, Vienna	8.50

**Annex I**  
**S.02.01.02**  
**Balance sheet**

Solvency II value

Assets		C0010
Intangible assets	R0030	0
Deferred tax assets	R0040	64 134
Pension benefit surplus	R0050	
Property, plant & equipment held for own use	R0060	84 721
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	11 100 853
Property (other than for own use)	R0080	568 585
Holdings in related undertakings, including participations	R0090	9 526 439
Equities	R0100	0
Equities - listed	R0110	0
Equities - unlisted	R0120	0
Bonds	R0130	665 438
Government Bonds	R0140	78 419
Corporate Bonds	R0150	587 019
Structured notes	R0160	0
Collateralised securities	R0170	
Collective Investments Undertakings	R0180	1 641
Derivatives	R0190	0
Deposits other than cash equivalents	R0200	338 750
Other investments	R0210	
Assets held for index-linked and unit-linked contracts	R0220	0
Loans and mortgages	R0230	154 512
Loans on policies	R0240	0
Loans and mortgages to individuals	R0250	0
Other loans and mortgages	R0260	154 512
Reinsurance recoverables from:	R0270	246 597
Non-life and health similar to non-life	R0280	246 597
Non-life excluding health	R0290	239 564
Health similar to non-life	R0300	7 032
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	0
Health similar to life	R0320	0
Life excluding health and index-linked and unit-linked	R0330	0
Life index-linked and unit-linked	R0340	
Deposits to cedants	R0350	1 218 466
Insurance and intermediaries receivables	R0360	122 791
Reinsurance receivables	R0370	35 855
Receivables (trade, not insurance)	R0380	169 896
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	972 406
Any other assets, not elsewhere shown	R0420	14 059
<b>Total assets</b>	<b>R0500</b>	<b>14 184 289</b>



**Annex I**  
**S.02.01.02**  
**Balance sheet**

Solvency II value

Liabilities		<b>C0010</b>
Technical provisions – non-life	<b>R0510</b>	1 638 968
Technical provisions – non-life (excluding health)	<b>R0520</b>	1 341 052
TP calculated as a whole	<b>R0530</b>	
Best Estimate	<b>R0540</b>	1 275 976
Risk margin	<b>R0550</b>	65 076
Technical provisions - health (similar to non-life)	<b>R0560</b>	297 917
TP calculated as a whole	<b>R0570</b>	
Best Estimate	<b>R0580</b>	277 970
Risk margin	<b>R0590</b>	19 947
Technical provisions - life (excluding index-linked and unit-linked)	<b>R0600</b>	56 281
Technical provisions - health (similar to life)	<b>R0610</b>	0
TP calculated as a whole	<b>R0620</b>	
Best Estimate	<b>R0630</b>	0
Risk margin	<b>R0640</b>	0
Technical provisions – life (excluding health and index-linked and unit-linked)	<b>R0650</b>	56 281
TP calculated as a whole	<b>R0660</b>	
Best Estimate	<b>R0670</b>	56 270
Risk margin	<b>R0680</b>	11
Technical provisions – index-linked and unit-linked	<b>R0690</b>	-90
TP calculated as a whole	<b>R0700</b>	
Best Estimate	<b>R0710</b>	-167
Risk margin	<b>R0720</b>	77
Contingent liabilities	<b>R0740</b>	44 152
Provisions other than technical provisions	<b>R0750</b>	124 331
Pension benefit obligations	<b>R0760</b>	50 726
Deposits from reinsurers	<b>R0770</b>	0
Deferred tax liabilities	<b>R0780</b>	218 709
Derivatives	<b>R0790</b>	1 685
Debts owed to credit institutions	<b>R0800</b>	227 965
Financial liabilities other than debts owed to credit institutions	<b>R0810</b>	360 065
Insurance & intermediaries payables	<b>R0820</b>	160 013
Reinsurance payables	<b>R0830</b>	10 909
Payables (trade, not insurance)	<b>R0840</b>	489 918
Subordinated liabilities	<b>R0850</b>	1 569 557
Subordinated liabilities not in BOF	<b>R0860</b>	0
Subordinated liabilities in BOF	<b>R0870</b>	1 569 557
Any other liabilities, not elsewhere shown	<b>R0880</b>	732
<b>Total liabilities</b>	<b>R0900</b>	4 953 921
<b>Excess of assets over liabilities</b>	<b>R1000</b>	9 230 368

Annex I

S.05.01.02

Premiums, claims and expenses by line of business

Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)									
	Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance
	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090
<b>Premiums written</b>									
Gross - Direct Business	R0110	0	0	0	0	5 455	240 409	4 871	
Gross - Proportional reinsurance accepted	R0120	21 484	333 576	876 957	0	0	394	0	
Gross - Non-proportional reinsurance accepted	R0130								
Reinsurers' share	R0140	0	1 828	7 606	0	1 451	128 610	3 001	
Net	R0200	21 484	331 748	869 351	0	4 004	112 192	1 870	
<b>Premiums earned</b>									
Gross - Direct Business	R0210	0	0	0	0	5 080	229 113	4 371	
Gross - Proportional reinsurance accepted	R0220	19 147	334 105	836 900	0	0	394	0	
Gross - Non-proportional reinsurance accepted	R0230								
Reinsurers' share	R0240	0	1 828	7 592	0	1 438	126 160	2 770	
Net	R0300	19 147	332 278	829 308	0	3 642	103 347	1 601	
<b>Claims incurred</b>									
Gross - Direct Business	R0310	0	0	0	0	1 394	211 637	840	
Gross - Proportional reinsurance accepted	R0320	16 896	145 300	571 952	-3	16	45	0	
Gross - Non-proportional reinsurance accepted	R0330								
Reinsurers' share	R0340	0	212	3 164	0	-36	122 306	501	
Net	R0400	16 896	145 088	568 788	-3	1 446	89 377	338	
<b>Changes in other technical provisions</b>									
Gross - Direct Business	R0410	0	0	0	0	0	-1 049	0	
Gross - Proportional reinsurance accepted	R0420								
Gross - Non-proportional reinsurance accepted	R0430								
Reinsurers' share	R0440								
Net	R0500	0	0	0	0	0	-1 049	0	
<b>Expenses incurred</b>	R0550	5 381	201 332	319 054	4	1 425	20 331	200	
<b>Other expenses</b>	R1200								
<b>Total expenses</b>	R1300								

Annex I

S.05.01.02

Premiums, claims and expenses by line of business

	Line of Business for: <b>non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)</b>			Line of business for: <b>accepted non-proportional reinsurance</b>			Total	
	Legal expenses insurance	Assistance	Miscellaneous financial loss	Health	Casualty	Marine, aviation, transport		Property
	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0200
<b>Premiums written</b>								
Gross - Direct Business	R0110							250 734
Gross - Proportional reinsurance accepted	R0120							1 232 409
Gross - Non-proportional reinsurance accepted	R0130							
Reinsurers' share	R0140							142 495
Net	R0200							1 340 649
<b>Premiums earned</b>								
Gross - Direct Business	R0210							238 564
Gross - Proportional reinsurance accepted	R0220							1 190 545
Gross - Non-proportional reinsurance accepted	R0230							
Reinsurers' share	R0240							139 788
Net	R0300							1 289 321
<b>Claims incurred</b>								
Gross - Direct Business	R0310							213 871
Gross - Proportional reinsurance accepted	R0320							734 207
Gross - Non-proportional reinsurance accepted	R0330							
Reinsurers' share	R0340							126 147
Net	R0400							821 931
<b>Changes in other technical provisions</b>								
Gross - Direct Business	R0410							-1 049
Gross - Proportional reinsurance accepted	R0420							
Gross - Non- proportional reinsurance accepted	R0430							
Reinsurers'share	R0440							
Net	R0500							-1 049
<b>Expenses incurred</b>	R0550							547 726
<b>Other expenses</b>	R1200							3 198
<b>Total expenses</b>	R1300							550 925

Annex I

S.05.01.02

Premiums, claims and expenses by line of business

	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
<b>Premiums written</b>									
Gross	R1410							16 174	16 174
Reinsurers' share	R1420								
Net	R1500							16 174	16 174
<b>Premiums earned</b>									
Gross	R1510							16 174	16 174
Reinsurers' share	R1520								
Net	R1600							16 174	16 174
<b>Claims incurred</b>									
Gross	R1610							3 239	3 239
Reinsurers' share	R1620								
Net	R1700							3 239	3 239
<b>Changes in other technical provisions</b>									
Gross	R1710							-13 752	-13 752
Reinsurers' share	R1720								
Net	R1800							-13 752	-13 752
<b>Expenses incurred</b>	R1900							327	327
<b>Other expenses</b>	R2500								
<b>Total expenses</b>	R2600								327

Annex I

S.05.02.01

Premiums, claims and expenses by country

	Home Country	Top 5 countries (by amount of gross premiums written) - non-life obligations						Total Top 5 and home country
	C0010	C0020	C0030	C0040	C0050	C0060	C0070	
R0010	CZ	DE	PL	RO	SK			
	C0080	C0090	C0100	C0110	C0120	C0130	C0140	
<b>Premiums written</b>								
Gross - Direct Business	R0110	43 899	5 430	73 461	22 498	3 954	4 199	153 441
Gross - Proportional reinsurance accepted	R0120	289 016	328 231	36 616	176 290	101 000	81 136	1 012 289
Gross - Non-proportional reinsurance accepted	R0130							
Reinsurers' share	R0140	61	21 516	22 991	-3			44 565
Net	R0200	332 854	312 146	87 086	198 790	104 954	85 335	1 121 164
<b>Premiums earned</b>								
Gross - Direct Business	R0210	44 780	5 100	71 920	21 204	3 187	4 117	150 308
Gross - Proportional reinsurance accepted	R0220	288 265	316 746	36 506	174 165	93 725	79 634	989 041
Gross - Non-proportional reinsurance accepted	R0230							
Reinsurers' share	R0240	493	21 481	22 762	-1			44 735
Net	R0300	332 552	300 365	85 664	195 370	96 912	83 752	1 094 614
<b>Claims incurred</b>								
Gross - Direct Business	R0310	45 955	191	97 365	9 505	29	87	153 133
Gross - Proportional reinsurance accepted	R0320	179 244	156 701	16 357	114 981	79 363	53 281	599 926
Gross - Non-proportional reinsurance accepted	R0330							
Reinsurers' share	R0340	979	22 824	15 684				39 487
Net	R0400	224 220	134 068	98 039	124 486	79 392	53 368	713 572
<b>Changes in other technical provisions</b>								
Gross - Direct Business	R0410	-1 049						-1 049
Gross - Proportional reinsurance accepted	R0420							
Gross - Non- proportional reinsurance accepted	R0430							
Reinsurers' share	R0440							
Net	R0500	-1 049						-1 049
<b>Expenses incurred</b>	R0550							
<b>Other expenses</b>	R1200							
<b>Total expenses</b>	R1300							

Annex I

S.05.02.01

Premiums, claims and expenses by country

	Home Country	Top 5 countries (by amount of gross premiums written) - life obligations						Total Top 5 and home country
		C0150	C0160	C0170	C0180	C0190	C0200	C0210
R1400			RO					
		C0220	C0230	C0240	C0250	C0260	C0270	C0280
<b>Premiums written</b>								
Gross	R1410		16 174					16 174
Reinsurers' share	R1420							
Net	R1500		16 174					16 174
<b>Premiums earned</b>								
Gross	R1510		16 174					16 174
Reinsurers' share	R1520							
Net	R1600		16 174					16 174
<b>Claims incurred</b>								
Gross	R1610		430					430
Reinsurers' share	R1620							
Net	R1700		430					430
<b>Changes in other technical provisions</b>								
Gross	R1710							
Reinsurers' share	R1720							
Net	R1800							
<b>Expenses incurred</b>	R1900							
<b>Other expenses</b>	R2500							
<b>Total expenses</b>	R2600							

**Annex I**  
**S.12.01.02**  
**Life and Health SLT Technical Provisions**

		Index-linked and unit-linked insurance			Other life insurance			Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Accepted reinsurance	Total (Life other than health insurance, incl. Unit-Linked)	
		Insurance with profit participation	Contracts without options and guarantees	Contracts with options or guarantees	Contracts without options and guarantees	Contracts with options or guarantees					
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0150
<b>Technical provisions calculated as a whole</b>	<b>R0010</b>										
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole	R0020										
<b>Technical provisions calculated as a sum of BE and RM</b>											
<b>Best Estimate</b>											
<b>Gross Best Estimate</b>	<b>R0030</b>									56 103	56 103
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0080									0	0
Best estimate minus recoverables from reinsurance/SPV and Finite Re - total	R0090									56 103	56 103
<b>Risk Margin</b>	<b>R0100</b>									88	88
<b>Amount of the transitional on Technical Provisions</b>											
Technical Provisions calculated as a whole	R0110										
Best estimate	R0120										
Risk margin	R0130										
<b>Technical provisions - total</b>	<b>R0200</b>									56 191	56 191

**Annex I**  
**S.12.01.02**  
**Life and Health SLT Technical Provisions**

Health insurance (direct business)		Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Health reinsurance (reinsurance accepted)	<b>Total (Health similar to life insurance)</b>	
Contracts without options and guarantees	Contracts with options or guarantees				
<b>C0160</b>	<b>C0170</b>	<b>C0180</b>	<b>C0190</b>	<b>C0200</b>	<b>C0210</b>

		C0160	C0170	C0180	C0190	C0200	C0210
<b>Technical provisions calculated as a whole</b>	<b>R0010</b>						
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole	<b>R0020</b>						
<b>Technical provisions calculated as a sum of BE and RM Best Estimate</b>							
<b>Gross Best Estimate</b>	<b>R0030</b>						
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	<b>R0080</b>						
Best estimate minus recoverables from reinsurance/SPV and Finite Re - total	<b>R0090</b>						
<b>Risk Margin</b>	<b>R0100</b>						
<b>Amount of the transitional on Technical Provisions</b>							
Technical Provisions calculated as a whole	<b>R0110</b>						
Best estimate	<b>R0120</b>						
Risk margin	<b>R0130</b>						
<b>Technical provisions - total</b>	<b>R0200</b>						



**Annex I**  
**S.17.01.02**  
**Non-life Technical Provisions**

Direct business and accepted proportional reinsurance										
	Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	
	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	
<b>Technical provisions calculated as a whole</b>	<b>R0010</b>									
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole	<b>R0050</b>									
<b>Technical provisions calculated as a sum of BE and RM</b>										
<b>Best estimate</b>										
Premium provisions										
Gross	<b>R0060</b>	0	-21 722	0	50 298	0	377	37 436	574	0
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	<b>R0140</b>	0	0	0	0	0	7	7 066	3	0
Net Best Estimate of Premium Provisions	<b>R0150</b>	0	-21 722	0	50 298	0	369	30 369	571	0
<b>Claims provisions</b>										
Gross	<b>R0160</b>	1 319	298 373	0	801 108		3 474	377 856	4 853	0
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	<b>R0240</b>	0	7 032	0	28 419	0	872	200 862	2 334	0
Net Best Estimate of Claims Provisions	<b>R0250</b>	1 319	291 341	0	772 689		2 603	176 994	2 518	0
<b>Total Best estimate - gross</b>	<b>R0260</b>	1 319	276 651	0	851 406		3 851	415 291	5 426	0
<b>Total Best estimate - net</b>	<b>R0270</b>	1 319	269 619	0	822 987		2 972	207 363	3 089	0
<b>Risk margin</b>	<b>R0280</b>	90	19 857	0	52 664		177	12 063	172	0
<b>Amount of the transitional on Technical Provisions</b>										
Technical Provisions calculated as a whole	<b>R0290</b>									
Best estimate	<b>R0300</b>									
Risk margin	<b>R0310</b>									

**Annex I**  
**S.17.01.02**  
**Non-life Technical Provisions**

Direct business and accepted proportional reinsurance										
	Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	
	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	
<b>Technical provisions - total</b>										
Technical provisions - total	<b>R0320</b>	1 409	296 508	0	904 070		4 028	427 355	5 598	0
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	<b>R0330</b>	0	7 032	0	28 419	0	879	207 928	2 337	0
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	<b>R0340</b>	1 409	289 475	0	875 650		3 149	219 426	3 261	0

**Annex I**  
**S.17.01.02**  
**Non-life Technical Provisions**

		Direct business and accepted proportional reinsurance			Accepted non-proportional reinsurance			Total Non-Life obligation	
		Legal expenses insurance	Assistance	Miscellaneous financial loss	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance		Non-proportional property reinsurance
		C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180
<b>Technical provisions calculated as a whole</b>	<b>R0010</b>								
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole	<b>R0050</b>								
<b>Technical provisions calculated as a sum of BE and RM</b>									
<b>Best estimate</b>									
<b>Premium provisions</b>									
Gross	<b>R0060</b>	0	0	0	0	0	0	0	66 961
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	<b>R0140</b>	0	0	0	0	0	0	0	7 077
Net Best Estimate of Premium Provisions	<b>R0150</b>	0	0	0	0	0	0	0	59 885
<b>Claims provisions</b>									
Gross	<b>R0160</b>	0	0	1	0	0	0	0	1 486 984
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	<b>R0240</b>	0	0	0	0	0	0	0	239 520
Net Best Estimate of Claims Provisions	<b>R0250</b>	0	0	1	0	0	0	0	1 247 465
<b>Total Best estimate - gross</b>	<b>R0260</b>	0	0	1	0	0	0	0	1 553 946
<b>Total Best estimate - net</b>	<b>R0270</b>	0	0	1	0	0	0	0	1 307 349
<b>Risk margin</b>	<b>R0280</b>	0	0		0	0	0	0	85 023
<b>Amount of the transitional on Technical Provisions</b>									
Technical Provisions calculated as a whole	<b>R0290</b>								
Best estimate	<b>R0300</b>								
Risk margin	<b>R0310</b>								

Annex I  
S.17.01.02  
Non-life Technical Provisions

	Direct business and accepted proportional reinsurance			Accepted non-proportional reinsurance				Total Non-Life obligation
	Legal expenses insurance	Assistance	Miscellaneous financial loss	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance	
	C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180
<b>Technical provisions - total</b>								
Technical provisions - total	R0320	0	0	1	0	0	0	1 638 968
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	R0330	0	0	0	0	0	0	246 597
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	R0340	0	0	1	0	0	0	1 392 372

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Non-life Insurance Claims Information

Total Non-Life Business

Accident year / Underwriting year	<b>Z0020</b>	<b>Underwriting year</b>
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Gross Claims Paid (non-cumulative)

(absolute amount)

Year	Development year											In Current year	Sum of years (cumulative)		
	0	1	2	3	4	5	6	7	8	9	10 & +			C0170	C0180
	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110				
Prior	R0100											3 873	R0100	3 873	3 873
N-9	R0160	34 501	58 412	17 016	6 307	3 404	1 930	1 629	796	1 195	7 524		R0160	7 524	132 714
N-8	R0170	34 782	62 654	19 243	8 565	6 120	13 356	1 701	1 816	9 863			R0170	9 863	158 101
N-7	R0180	39 313	70 244	21 759	9 341	5 279	2 758	2 221	1 295				R0180	1 295	152 209
N-6	R0190	38 741	73 101	20 141	7 854	3 134	2 209	1 805					R0190	1 805	146 984
N-5	R0200	40 521	71 172	19 438	8 877	4 164	2 340						R0200	2 340	146 511
N-4	R0210	40 331	71 940	18 929	7 480	4 397							R0210	4 397	143 077
N-3	R0220	40 634	64 100	14 793	6 541								R0220	6 541	126 068
N-2	R0230	39 097	67 644	16 318									R0230	16 318	123 058
N-1	R0240	45 343	89 766										R0240	89 766	135 108
N	R0250	52 163											R0250	52 163	52 163
<b>Total</b>	<b>R0260</b>												<b>R0260</b>	<b>195 885</b>	<b>1 319 867</b>



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Non-life Insurance Claims Information

Total Non-Life Business

Accident year / Underwriting year	<b>Z0020</b>	Accident year
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Gross Claims Paid (non-cumulative)  
(absolute amount)

Year	Development year											In Current year	Sum of years (cumulative)		
	0	1	2	3	4	5	6	7	8	9	10 & +			C0170	C0180
	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110				
Prior	R0100											3 013	R0100	3 013	3 013
N-9	R0160	181 285	131 097	45 534	28 439	12 952	3 926	1 989	1 277	867	896		R0160	896	408 262
N-8	R0170	184 087	121 566	50 483	22 034	10 651	4 937	2 333	2 281	1 910			R0170	1 910	400 282
N-7	R0180	169 753	141 669	55 464	18 547	12 363	3 554	3 276	3 305				R0180	3 305	407 931
N-6	R0190	188 628	147 186	47 533	24 829	16 077	7 523	6 158					R0190	6 158	437 933
N-5	R0200	214 967	151 185	59 713	29 929	18 216	4 975						R0200	4 975	478 984
N-4	R0210	272 031	183 014	63 124	34 312	13 836							R0210	13 836	566 318
N-3	R0220	231 737	124 373	57 628	20 366								R0220	20 366	434 104
N-2	R0230	188 043	141 913	54 895									R0230	54 895	384 850
N-1	R0240	233 075	169 333										R0240	169 333	402 407
N	R0250	267 930											R0250	267 930	267 930
<b>Total</b>	<b>R0260</b>												<b>R0260</b>	<b>546 615</b>	<b>4 192 015</b>

Annex I

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Non-life Insurance Claims Information

Gross undiscounted Best Estimate Claims Provisions  
(absolute amount)

Year	Development year											Year end (discounted data)		
	0	1	2	3	4	5	6	7	8	9	10 & +			
	C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0360		
Prior	R0100											38 919	R0100	31 238
N-9	R0160	0	0	0	65 555	32 857	23 747	18 867	16 118	13 307	14 254		R0160	11 930
N-8	R0170	0	0	97 835	50 571	36 489	25 685	23 363	21 616	21 251			R0170	17 823
N-7	R0180	0	144 183	94 090	55 636	37 075	29 187	24 473	22 979				R0180	19 470
N-6	R0190	273 299	147 255	94 911	46 902	36 019	27 682	26 472					R0190	22 020
N-5	R0200	317 284	164 571	121 740	69 442	40 222	40 486						R0200	34 528
N-4	R0210	374 285	206 571	140 525	88 972	73 296							R0210	64 177
N-3	R0220	365 813	173 533	105 262	81 309								R0220	71 615
N-2	R0230	405 579	224 481	141 876									R0230	128 720
N-1	R0240	486 710	314 542										R0240	292 418
N	R0250	526 452											R0250	493 235
	<b>Total</b>												R0260	1 187 174



**Annex I**

**S.22.01.21**

**Impact of long term guarantees and transitional measures**

Amount with Long Term Guarantee measures and transitionals	Impact of transitional on technical provisions	Impact of transitional on interest rate	Impact of volatility adjustment set to zero	Impact of matching adjustment set to zero
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		C0010	C0030	C0050	C0070	C0090
Technical provisions	R0010					
Basic own funds	R0020					
Eligible own funds to meet Solvency Capital Requirement	R0050					
Solvency Capital Requirement	R0090					
Eligible own funds to meet Minimum Capital Requirement	R0100					
Minimum Capital Requirement	R0110					

**Annex I**  
**S.23.01.01**  
**Own funds**

	Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
	C0010	C0020	C0030	C0040	C0050
<b>Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation (EU) 2015/35</b>					
Ordinary share capital (gross of own shares)	R0010	132 887	132 887	0	
Share premium account related to ordinary share capital	R0030	1 994 216	1 994 216	0	
initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040	0	0	0	
Subordinated mutual member accounts	R0050	0	0	0	
Surplus funds	R0070	0	0		
Preference shares	R0090	0	0	0	
Share premium account related to preference shares	R0110	0	0	0	
Reconciliation reserve	R0130	6 927 227	6 927 227		
Subordinated liabilities	R0140	1 569 557		245 137	1 324 420
An amount equal to the value of net deferred tax assets	R0160				
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180				
<b>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</b>					
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				
<b>Deductions</b>					
Deductions for participations in financial and credit institutions	R0230				
<b>Total basic own funds after deductions</b>	R0290	10 623 887	9 054 331	245 137	1 324 420
<b>Ancillary own funds</b>					
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				

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S.23.01.01  
Own funds

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
<b>Available and eligible own funds</b>						
Total available own funds to meet the SCR	R0500	10 623 887	9 054 331	245 137	1 324 420	
Total available own funds to meet the MCR	R0510	10 623 887	9 054 331	245 137	1 324 420	
Total eligible own funds to meet the SCR	R0540	10 567 377	9 054 331	245 137	1 267 909	0
Total eligible own funds to meet the MCR	R0550	9 426 259	9 054 331	245 137	126 791	
<b>SCR</b>	R0580	2 535 818				
<b>MCR</b>	R0600	633 955				
<b>Ratio of Eligible own funds to SCR</b>	R0620	416.72%				
<b>Ratio of Eligible own funds to MCR</b>	R0640	1486.90%				

		C0060
<b>Reconciliation reserve</b>		
Excess of assets over liabilities	R0700	9 230 368
Own shares (held directly and indirectly)	R0710	0
Foreseeable dividends, distributions and charges	R0720	176 038
Other basic own fund items	R0730	2 127 104
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	0
<b>Reconciliation reserve</b>	R0760	6 927 227
<b>Expected profits</b>		
Expected profits included in future premiums (EPIFP) - Life business	R0770	0
Expected profits included in future premiums (EPIFP) - Non- life business	R0780	83 469
<b>Total Expected profits included in future premiums (EPIFP)</b>	R0790	83 469

**Annex I**  
**S.25.01.21**  
**Solvency Capital Requirement - for undertakings on Standard Formula**

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0120
Market risk	R0010			
Counterparty default risk	R0020			
Life underwriting risk	R0030			
Health underwriting risk	R0040			
Non-life underwriting risk	R0050			
Diversification	R0060			
Intangible asset risk	R0070			
<b>Basic Solvency Capital Requirement</b>	<b>R0100</b>			

Calculation of Solvency Capital Requirement C0100

Operational risk	R0130	
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	
<b>Solvency capital requirement excluding capital add-on</b>	<b>R0200</b>	
Capital add-on already set	R0210	
<b>Solvency capital requirement</b>	<b>R0220</b>	
<b>Other information on SCR</b>		
Capital requirement for duration-based equity risk sub-module	R0400	
Total amount of Notional Solvency Capital Requirement for remaining part	R0410	
Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420	
Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios	R0430	
Diversification effects due to RFF nSCR aggregation for article 304	R0440	

Yes/No

Approach based on average tax rate	R0590	
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LAC DT

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

Annex I

S.25.02.21

Solvency Capital Requirement - for undertakings using the standard formula and partial internal model

Unique number of component	Components description	Calculation of the Solvency Capital Requirement	Amount modelled	USP	Simplifications
C0010	C0020	C0030	C0070	C0090	C0120
1	Market risk	2 463 444	36 488		
2	Counterparty default risk	127 910	0		
3	Life underwriting risk	5 044	0		
4	Health underwriting risk	47 301	46 725		
5	Non-life underwriting risk	285 720	285 720		
6	Intangible asset risk	0	0		
7	Operational risk	46 872	0		
8	LAC Technical Provisions (negative amount)	0	0		
9	LAC Deferred Taxes (negative amount)	-115 430	0		

Calculation of Solvency Capital Requirement

	R0110	R0160	R0200	R0210	R0220	R0300	R0310	R0400	R0410	R0420	R0430	R0440
Total undiversified components	2 860 859											
Diversification							-325 041					
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC									0			
<b>Solvency capital requirement excluding capital add-on</b>									2 535 818			
Capital add-ons already set									0			
<b>Solvency capital requirement</b>									2 535 818			
<b>Other information on SCR</b>												
Amount/estimate of the overall loss-absorbing capacity of technical provisions												
Amount/estimate of the overall loss-absorbing capacity of deferred taxes							-115 430					
Capital requirement for duration-based equity risk sub-module									0			
Total amount of Notional Solvency Capital Requirements for remaining part									0			
Total amount of Notional Solvency Capital Requirements for ring fenced funds (other than those related to business operated in accordance with Art. 4 of Directive 2003/41/EC (transitional))									0			
Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios									0			
Diversification effects due to RFF nSCR aggregation for article 304									0			

Yes/No

C0109

Approach based on average tax rate	R0590	Yes
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LAC DT

C0130

LAC DT	R0640	-115 430
LAC DT justified by reversion of deferred tax liabilities	R0650	-115 430
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	-154 575

Annex I

S.28.01.01

Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity

Linear formula component for non-life insurance and reinsurance obligations

		C0010
MCR <sub>NL</sub> Result	R0010	245 600

Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
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		C0020	C0030
Medical expense insurance and proportional reinsurance	R0020	1 319	21 484
Income protection insurance and proportional reinsurance	R0030	269 619	331 748
Workers' compensation insurance and proportional reinsurance	R0040	0	
Motor vehicle liability insurance and proportional reinsurance	R0050	822 987	869 351
Other motor insurance and proportional reinsurance	R0060		0
Marine, aviation and transport insurance and proportional reinsurance	R0070	2 972	4 004
Fire and other damage to property insurance and proportional reinsurance	R0080	207 363	112 192
General liability insurance and proportional reinsurance	R0090	3 089	1 870
Credit and suretyship insurance and proportional reinsurance	R0100	0	
Legal expenses insurance and proportional reinsurance	R0110	0	
Assistance and proportional reinsurance	R0120	0	
Miscellaneous financial loss insurance and proportional reinsurance	R0130	1	
Non-proportional health reinsurance	R0140	0	
Non-proportional casualty reinsurance	R0150	0	
Non-proportional marine, aviation and transport reinsurance	R0160	0	
Non-proportional property reinsurance	R0170	0	

**Annex I**

**S.28.01.01**

**Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity**

**Linear formula component for life insurance and reinsurance obligations**

<b>C0040</b>		
MCR <sub>L</sub> Result	<b>R0200</b>	2 089

Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk

	<b>C0050</b>	<b>C0060</b>
Obligations with profit participation - guaranteed benefits	<b>R0210</b>	56 270
Obligations with profit participation - future discretionary benefits	<b>R0220</b>	<del>                    </del>
Index-linked and unit-linked insurance obligations	<b>R0230</b>	0
Other life (re)insurance and health (re)insurance obligations	<b>R0240</b>	0
Total capital at risk for all life (re)insurance obligations	<b>R0250</b>	<del>                    </del> 10 625

**Overall MCR calculation**

<b>C0070</b>		
Linear MCR	<b>R0300</b>	247 689
SCR	<b>R0310</b>	2 535 818
MCR cap	<b>R0320</b>	1 141 118
MCR floor	<b>R0330</b>	633 955
Combined MCR	<b>R0340</b>	633 955
Absolute floor of the MCR	<b>R0350</b>	4 000

<b>C0070</b>		
<b>Minimum Capital Requirement</b>	<b>R0400</b>	633 955

Annex I

S.28.02.01

Minimum capital Requirement - Both life and non-life insurance activity

Non-life activities	Life activities
MCR <sub>(NL,NL)</sub> Result	MCR <sub>(NL,L)</sub> Result

C0010

C0020

Linear formula component for non-life insurance and reinsurance obligations	R0010		

Non-life activities	Life activities

Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months	Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months

C0030

C0040

C0050

C0060

	R0020				
Medical expense insurance and proportional reinsurance	R0020				
Income protection insurance and proportional reinsurance	R0030				
Workers' compensation insurance and proportional reinsurance	R0040				
Motor vehicle liability insurance and proportional reinsurance	R0050				
Other motor insurance and proportional reinsurance	R0060				
Marine, aviation and transport insurance and proportional reinsurance	R0070				
Fire and other damage to property insurance and proportional reinsurance	R0080				
General liability insurance and proportional reinsurance	R0090				
Credit and suretyship insurance and proportional reinsurance	R0100				
Legal expenses insurance and proportional reinsurance	R0110				
Assistance and proportional reinsurance	R0120				
Miscellaneous financial loss insurance and proportional reinsurance	R0130				
Non-proportional health reinsurance	R0140				
Non-proportional casualty reinsurance	R0150				
Non-proportional marine, aviation and transport reinsurance	R0160				
Non-proportional property reinsurance	R0170				



Annex I

S.28.02.01

Minimum capital Requirement - Both life and non-life insurance activity

Non-life activities	Life activities
MCR <sub>(L,NL)</sub> Result	MCR <sub>(L,L)</sub> Result
<b>C0070</b>	<b>C0080</b>

Non-life activities	Life activities
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Linear formula component for life insurance and reinsurance obligations	<b>R0200</b>		
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Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk	Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
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	<b>C0090</b>	<b>C0100</b>	<b>C0110</b>	<b>C0120</b>
Obligations with profit participation - guaranteed benefits	<b>R0210</b>			
Obligations with profit participation - future discretionary benefits	<b>R0220</b>			
Index-linked and unit-linked insurance obligations	<b>R0230</b>			
Other life (re)insurance and health (re)insurance obligations	<b>R0240</b>			
Total capital at risk for all life (re)insurance obligations	<b>R0250</b>			

**Annex I****S.28.02.01****Minimum capital Requirement - Both life and non-life insurance activity****Overall MCR calculation**

<b>C0130</b>		
Linear MCR	<b>R0300</b>	
SCR	<b>R0310</b>	
MCR cap	<b>R0320</b>	
MCR floor	<b>R0330</b>	
Combined MCR	<b>R0340</b>	
Absolute floor of the MCR	<b>R0350</b>	

<b>C0130</b>		
<b>Minimum Capital Requirement</b>	<b>R0400</b>	

**Notional non-life and life MCR calculation**

Non-life activities	Life activities
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	<b>C0140</b>	<b>C0150</b>
Notional linear MCR	<b>R0500</b>	
Notional SCR excluding add-on (annual or latest calculation)	<b>R0510</b>	
Notional MCR cap	<b>R0520</b>	
Notional MCR floor	<b>R0530</b>	
Notional Combined MCR	<b>R0540</b>	
Absolute floor of the notional MCR	<b>R0550</b>	
Notional MCR	<b>R0560</b>	