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# **Independent Auditor's Report**

# To the Members of GAN Direct Insurance Limited

Report on the Audit of the relevant elements of the Solvency and Financial Condition Report.

## Opinion

We have audited the following Solvency II Quantitative Reporting Templates ("QRTs") contained in annex I to Commission Implementing Regulation (EU) No 2023/895 of 4 April 2023, of GAN Direct Insurance Limited (the" Company" prepared as at 31 December 2023.

- S.02.01.02 Balance sheet
- S.17.01.02 Non-Life Technical Provisions
- S.23.01.01 Own funds
- S.25.01.21 Solvency Capital Requirement for undertakings on Standard Formula
- S.28.01.01 Minimum Capital Requirement Only non-life insurance or reinsurance activity

The above QRTs are collectively referred to for the remainder of this report as "the relevant QRTs of the Solvency and Financial Condition Report".

In our opinion, the information in the relevant QRTs of the Solvency and Financial Condition Report as at 31 December 2023 is prepared, in all material respects, in accordance with the Insurance and Reinsurance Services and other Related Issues Law of 2016 as amended, the Commission Delegated Regulation (EU) 2015/35 as amended, the relevant EU Commission's Implementing Regulations and the relevant Orders of the Superintendent of Insurance (collectively "the Framework").

### **Basis for Opinion**

We conducted our audit in accordance with International Standards on Auditing (ISAs). Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the relevant QRTs of the Solvency and Financial Condition Report section of our report. We are independent of the Company in accordance with the International Ethics Standards Board for Accountants' International Code of Ethics for Professional Accountants (including International Independence Standards) (IESBA Code) together with the ethical requirements that are relevant to our audit of the relevant QRTs of the Solvency and Financial Condition Report in Cyprus, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the IESBA Code. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

## **Emphasis of Matter**

We draw attention to the 'Valuation for solvency purposes' and 'Capital Management' and other relevant disclosures sections of the Solvency and Financial Condition Report, which describe the basis of preparation. The Solvency and Financial Condition Report is prepared in compliance with the Framework, and therefore in accordance with a special purpose financial reporting framework. As a result, the Solvency and Financial Condition Report may not be suitable for another purpose. Our opinion is not modified in respect of this matter.



#### Other information

The Board of Directors is responsible for the Other information. The Other information comprises certain narrative sections and certain QRTs of the Solvency and Financial Condition Report as listed below:

#### Narrative sections:

- Business and performance
- Valuation for solvency purposes:
- Capital management

QRTs (contained in Annex I to Commission Implementing Regulation (EU) No 2023/895 of 4 April 2023):

- S.05.01.02 Premiums, claims and expenses by line of business
- S.05.02.04 Premiums, claims and expenses by country
- S.19.01.21 Non-Life insurance claims

Our opinion on the relevant QRTs of the Solvency and Financial Condition Report does not cover the Other information listed above and we do not express any form of assurance conclusion thereon.

In connection with our audit of the Solvency and Financial Condition Report, our responsibility is to read the Other information and, in doing so, consider whether the Other information is materially inconsistent with the relevant elements of the Solvency and Financial Condition Report, or our knowledge obtained in the audit, or otherwise appears to be materially misstated. If, based on the work we have performed, we conclude that there is a material misstatement of this Other information, we are required to report that fact. We have nothing to report in this regard.

### Responsibilities of the Board of Directors for the Solvency and Financial Condition Report

The Board of Directors is responsible for the preparation of the Solvency and Financial Condition Report in accordance with the Framework.

The Board of Directors is also responsible for such internal control as the Board of Directors determines is necessary to enable the preparation of a Solvency and Financial Condition Report that is free from material misstatement, whether due to fraud or error.

In preparing the Solvency and Financial Condition Report, the Board of Directors is responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Board of Directors either intends to liquidate the Company or to cease operations, or has no realistic alternative but to do so.

The Board of Directors is responsible for overseeing the Company's financial reporting process.

# Auditor's Responsibilities for the Audit of the relevant QRTs of the Solvency and Financial Condition Report

Our objectives are to obtain reasonable assurance about whether the relevant QRTs of the Solvency and Financial Condition Report are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but it is not a guarantee that an audit conducted in accordance with ISAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the Solvency and Financial Condition Report.

As part of an audit in accordance with ISAs, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

 Identify and assess the risks of material misstatement of the relevant QRTs of the Solvency and Financial Condition Report, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.



- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are
  appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the
  Company's internal control.
- Evaluate the appropriateness of the basis of preparation used and the reasonableness of accounting estimates and related disclosures made by the Board of Directors.
- Conclude on the appropriateness of the Board of Directors' use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the Solvency and Financial Condition Report or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern.

We communicate with the Board of Directors regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

#### **Other Matter**

Our report is intended solely for the Board of Directors of the Company and should not be used by any other parties. We do not, in giving this opinion, accept or assume responsibility for any other purpose or to any other person to whose knowledge this report may come to.

Baker Tilly Klitou and Partners Ltd

Certified Public Accountants and Registered Auditors

Corner C Hatzopoulou & 30 Griva Digheni Avenue 1066 Nicosia

Cyprus

4 April 2024

# Annex I:

- S.02.01.02 Balance sheet
- S.17.01.02 Non-Life Technical Provisions
- S.23.01.01 Own funds
- S.25.01.21 Solvency Capital Requirement for undertakings on Standard Formula S.28.01.01 Minimum Capital Requirement Only non-life insurance or reinsurance activity
- S.05.01.02 Premiums, claims and expenses by line of business
  S.05.02.04 Premiums, claims and expenses by country (N/A)
- S.19.01.21 Non-Life insurance claims



# Appendix A – Balance Sheet (S.02.01.02)

		Solvency II value
Assets		C0010
Intangible assets	R0030	-
Deferred tax assets	R0040	41.205
Pension benefit surplus	R0050	-
Property, plant & equipment held for own use	R0060	8.727.946
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	9.417.658
Property (other than for own use)	R0080	-
Holdings in related undertakings, including participations	R0090	338.122
Equities	R0100	1.799
Equities - listed	R0110	1.799
Equities - unlisted	R0120	-
Bonds	R0130	9.077.737
Government Bonds	R0140	9.077.737
Corporate Bonds	R0150	-
Structured notes	R0160	-
Collateralised securities	R0170	-
Collective Investments Undertakings	R0180	-
Derivatives	R0190	-
Deposits other than cash equivalents	R0200	-
Other investments	R0210	-
Assets held for index-linked and unit-linked contracts	R0220	-
Loans and mortgages	R0230	-
Loans on policies	R0240	-
Loans and mortgages to individuals	R0250	-
Other loans and mortgages	R0260	-
Reinsurance recoverables from:	R0270	953.175
Non-life and health similar to non-life	R0280	953.175
Non-life excluding health	R0290	940.430
Health similar to non-life	R0300	12.745
Life and health similar to life, excluding health and index-linked and unit- linked	R0310	-
Health similar to life	R0320	-
Life excluding health and index-linked and unit-linked	R0330	-
Life index-linked and unit-linked	R0340	-
Deposits to cedants	R0350	-
Insurance and intermediaries receivables	R0360	1.140.240
Reinsurance receivables	R0370	-
Receivables (trade, not insurance)	R0380	4.263.543
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	447.025
Any other assets, not elsewhere shown	R0420	TIDA
Total assets	R0500	24:990.792

		Solvency II value
Liabilities		C0010
Technical provisions – non-life	R0510	12.655.948
Technical provisions – non-life (excluding health)	R0520	12.624.975
Technical provisions calculated as a whole	R0530	-
Best Estimate	R0540	12.008.948
Risk margin	R0550	616.027
Technical provisions - health (similar to non-life)	R0560	30.973
Technical provisions calculated as a whole	R0570	-
Best Estimate	R0580	29.462
Risk margin	R0590	1.511
Technical provisions - life (excluding index-linked and unit-linked)	R0600	-
Technical provisions - health (similar to life)	R0610	=
Technical provisions calculated as a whole	R0620	
Best Estimate	R0630	-
Risk margin	R0640	2
Technical provisions – life (excluding health and index-linked and unit-linked)	R0650	-
Technical provisions calculated as a whole	R0660	-
Best Estimate	R0670	, <u>-</u>
Risk margin	R0680	-
Technical provisions – index-linked and unit-linked	R0690	: <u>-</u>
Technical provisions calculated as a whole	R0700	-
Best Estimate	R0710	-
Risk margin	R0720	-
Contingent liabilities	R0740	-
Provisions other than technical provisions	R0750	-
Pension benefit obligations	R0760	-
Deposits from reinsurers	R0770	-
Deferred tax liabilities	R0780	-
Derivatives	R0790	846.325
Debts owed to credit institutions	R0800	-
Financial liabilities other than debts owed to credit institutions	R0810	-
Insurance & intermediaries payables	R0820	-
Reinsurance payables	R0830	352.043
Payables (trade, not insurance)	R0840	226.036
Subordinated liabilities	R0850	-
Subordinated liabilities not in Basic Own Funds	R0860	=
Subordinated liabilities in Basic Own Funds	R0870	-
Any other liabilities, not elsewhere shown	R0880	701.731
Total liabilities	R0900	14.782.083
Excess of assets over liabilities	R1000	10.208.709

		Solvency II value
Assets		C0010
Intangible assets	R0030	-
Deferred tax assets	R0040	41.205
Pension benefit surplus	R0050	The C.D.
Property, plant & equipment held for own use	R0060	8.727.946
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	9.417.658
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Equities - listed	R0110	1.799
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Bonds	R0130	9.077.737
Government Bonds	R0140	9.077.737
Corporate Bonds	R0150	_
Structured notes	R0160	_
Collateralised securities	R0170	_
Collective Investments Undertakings	R0180	_
Derivatives	R0190	
Deposits other than cash equivalents	R0200	
Other investments	R0210	-
Assets held for index-linked and unit-linked contracts	R0220	-
Loans and mortgages	R0230	-
Loans on policies	R0240	-
Loans and mortgages to individuals	R0250	-
Other loans and mortgages	R0260	-
Reinsurance recoverables from:	R0270	-
Non-life and health similar to non-life	R0280	953.175
	R0290	953.175
Non-life excluding health	R0300	940.430
Health similar to non-life	R0310	12.745
Life and health similar to life, excluding health and index-linked and unit-linked		-
Health similar to life	R0320	
Life excluding health and index-linked and unit-linked	R0330	-
Life index-linked and unit-linked	R0340	-
Deposits to cedants	R0350	-
nsurance and intermediaries receivables	R0360	1.140.240
Reinsurance receivables	R0370	-
Receivables (trade, not insurance)	R0380	4,263,5431.77
Own shares (held directly)	R0390	18/
amounts due in respect of own fund items or initial fund called up but not yet paid	R0400	13 - / V
Cash and cash equivalents	R0410	19X//
		X ROLLO
		A LANGUAGE CONTRACTOR OF THE PARTY OF THE PA

		447.025
Any other assets, not elsewhere shown	R0420	_
Total assets	R0500	24.990.792
Ti-Line		Solvency II value
Liabilities	Dog 40	C0010
Technical provisions – non-life	R0510	12.655.948
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Best Estimate	R0580	29.462
Risk margin	R0590	1.511
Technical provisions - life (excluding index-linked and unit-linked)	R0600	_
Technical provisions - health (similar to life)	R0610	_
Technical provisions calculated as a whole	R0620	
Best Estimate	R0630	
Risk margin	R0640	-
Technical provisions – life (excluding health and index-linked and unit-linked)	R0650	-
Technical provisions calculated as a whole	R0660	
Best Estimate	R0670	-
Risk margin	R0680	-
Technical provisions – index-linked and unit-linked	R0690	-
	R0700	-
Technical provisions calculated as a whole  Best Estimate	R0710	-
	R0720	-
Risk margin Contingent liabilities	R0740	-
Provisions other than technical provisions	R0750	-
Pension benefit obligations	R0760	-
Deposits from reinsurers	R0770	-
Deferred tax liabilities	R0780	TT-D X D
Derivatives	1	Z - AX
Debts owed to credit institutions	R0790	846.325
sects owed to credit institutions	R0800	V -

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Financial liabilities other than debts owed to credit institutions	R0810	_
Insurance & intermediaries payables	R0820	-
Reinsurance payables	R0830	352.043
Payables (trade, not insurance)	R0840	226.036
Subordinated liabilities	R0850	-
Subordinated liabilities not in Basic Own Funds	R0860	_
Subordinated liabilities in Basic Own Funds	R0870	
Any other liabilities, not elsewhere shown	R0880	701.731
Total liabilities	R0900	14.782.083
Excess of assets over liabilities	R1000	10.208.709



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

		Line of	Business for: n	on-life insuran	ce and reinsura rein	Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)	(direct busines:	and accepted	proportional	
		Medical expense insuran ce	Income protection insurance	Workers' compensati on insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Total
December		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0200
Gross - Direct Business	R0110		124 860		000000					
Gross - Proportional reinsurance accepted	R0120		124:002		0.000.0	3.400.760	855	889.879	19.719	13.094.754
Gross - Non-proportional reinsurance accepted	R0130	X								
Reinsurers' share	R0140		93.327		342.738	134 613		784 031		007 330 1
Net	R0200		31.542		8 315 934	3 26 147	250	107:01		600.000.1
Premiums earned					1000000	7:500.14/	650	104.948	19./19	11.739.145
Gross - Direct Business	R0210		138 971		8 463 783	2 2 4 7 5 7	220	000		
Gross - Proportional reinsurance accepted	R0220				6.405.705	3.347.737	853	899.113	15.031	12.865.512
Gross - Non-proportional reinsurance accepted	R0230	X								
Reinsurers' share	R0240		104.608		342.738	134.614		690.853		1 200 013
Net	R0300		34.363		8.121.045	3 213 143	855	200.000	15.031	2007/7:1
Claims incurred							CCS	200.202	18	66,765.11
Gross - Direct Business	R0310		1.015		4.731.633	3.620.054	1	138.482	MA	8.491.184
										TIP TO THE PROPERTY OF THE PRO

-		0201	700.702	7.740.215	1							4.141.917	4 141 017
		186		7.74								4.14	7
				1				X				6.213	
		205 131		00.049				X			907 100	291.198	
								X			VIII.		
			7 620 054	1.020.024				X			1 058 053	V.0500.0	
		541.211	4 190 422	1.170.722							2 735 115		
								X				$\bigvee$	
		4.627	3.612								50.738		
	X							X				$\bigvee$	X
R0320	R0330	R0340	R0400			R0410	R0420	R0430	R0440	R0500	R0550	R1200	R1300
Gross - Proportional reinsurance accepted	Gross - Non-proportional reinsurance accepted	Reinsurers' share	Net	Changes in other technical	provisions	Gross - Direct Business	Gross - Proportional reinsurance accepted	Gross - Non- proportional reinsurance accepted	Reinsurers' share	Net	Expenses incurred	Other expenses	Total expenses



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

				Direct business and accepted proportional reinsurance	ind accepted	proportional	reinsurance			
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Total Non-Life obligation
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	COOO	C0160
Technical provisions calculated as a whole	R0010		1							~
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole	R0050									
Technical provisions calculated as a sum of BE and RM		X				X	X			X
Best estimate		$\bigvee$	$\bigvee$		$\bigvee$	$\bigvee$	$\left\langle \right\rangle$	$\bigvee$	$\sqrt{}$	$\sqrt{}$
Premium provisions		$\bigvee$	$\bigvee$	$\bigvee$	$\bigvee$	$\bigvee$	$\bigvee$	$\bigvee$	$\left\langle \right\rangle$	$\left\langle \right\rangle$
Gross	R0060		24.554		2 442 925	824 377		17/1350	2 507	3 460 731
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140		9.104					55 507	3.307	5.409.721
Net Best Estimate of Premium Provisions	R0150		15.449		2.442.925	824 377		118 851	3 507	3 405 100
Claims provisions		$\bigvee$	$\bigvee$					170.071	7.00.0	2.402.103
Gross	R0160		4.908		7.650.056	834 611		70 114		007 075 0
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to	R0240					110.1.00		77.114		600.000.00
counterparty default			3.641		828.481	1		56 442		000.304
Net Best Estimate of Claims Provisions	R0250		1.267		6.821.575	834.611		22 672		7 561 195 1
Total Best estimate - gross	R0260		29.462		10.092.981	1.658.988		253 472	3 507	12 038 410
Total Best estimate - net	R0270		16.717		9.264.499	1.658.988		141.523	3.507	1108533
Kisk margin	R0280		1.511		517.743	85.102	1	13.002	180	885.78

Amount of the transitional on Technical Provisions			$\backslash\!$					X	X	X
Technical Provisions calculated as a whole	R0290									
Best estimate	R0300									
Risk margin	R0310									
Technical provisions - total		X		$\bigvee$	$\bigvee$	X				
Technical provisions - total	R0320		30.973	\	10 610 724	1 744 000		127	(10)	0,000
Recoverable from reinsurance contract/SPV and					10:010:01	1./44.030		200.4/4	3.68/	12.655.948
Finite Re after the adjustment for expected losses	R0330									052 175
due to counterparty default - total			12.745		828.481	,		111 940		273.173
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	R0340		900					111.747		11 700 770
Cash-flows of the Rest actimate of Decemina			10.228		9.782.242	1.744.090		154.525	3.687	11./02.//2
Provisions (Gross)		X	$\setminus$		X	X	X	X	X	X
Cash out-flows					$\bigvee$	$\bigvee$	$\bigvee$	$\bigvee$	$\bigvee$	
Future benefits and claims	R0410		15.981	2.003.410	636 203		174 250	157		001.000
Future expenses and other cash out-flows	R0420		8.573	439 515	188 174		66 701	1 250		2.832.109
Cash in-flows					100.17	$\cdot \rangle$	00./91	000.1	./	/06.403
Future premiums	R0430			\\ .						
Other cash in-flows (incl. Recoverables from	D0440									1
salvages and subrogations)	104+0V		71		,	,	21			
Cash-flows of the Best estimate of Claims Provisions (Gross)		X	X		X	X				X
Cash out-flows					$\bigvee$		$\bigvee$			
Future benefits and claims	R0410		3.194	2.089.513	644.101		79 114			7 815 022
Future expenses and other cash out-flows	R0420		1.714	1.376.347	190.510		31.214			1 500 704
Cash in-flows						X	TISTIC V			1.379.704
Future premiums	R0430									
Other cash in-flows (incl. Recoverables from salvages and subrogations)	R0440			1 100 472						1.100.472
				7/1:001:1						1



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

			In Current year	C0170		5.063.046	5.295.310	5.539 488	5.439.922	4 901 899	4.625.460	3.868.616	5.029.637	4.701.821	3.864.538	48.329.737
					R0100	R0160	R0170	R0180	R0190	R0200	R0210	R0220	R0230	R0240	R0250	R0260
						1										Total
			10&+	C0110			1									
			6	C0100	$\bigvee$	5.063.046										
			90	C0000	X	16.816	5.295.310									
			٢	C0080	$\bigvee$	30.529	67.077	5.539.488								
		ı	9	C0070	$\bigvee$	525.296	40.287	31.586	5.439.922							
		Development year	ıc	C0060	$\bigvee$	47.641	65.919	99.395	22.033	4.901.899						
		Dev	4	C0050	$\bigvee$	284.104	245.450	60.728	19.318	130.363	4.625.460					
			3	C0040	$\bigvee$	551.782	297.170	105.273	154.071	165.355	20.559	3.868.616				
			7	C0030	$\bigvee$	144.000	239.845	484.540	107.845	770.156	140.300	44.240	5.029.637			
ulative)			1	C0020	$\bigvee$	291.461	363.123	384.176	1.113.424	431.548	437.992	296.604	196.871	4.701.821		
Gross Claims Paid (non-cumulative)			0	C0010	$\bigvee$	1.084.847	1.148.546	1.336.455	1.740.273	1.508.186	1.874.940	1.551.108	1.426.967	2.014.171	3.864.538	
Claims P.					R0100	R0160	R0170	R0180	R0190	R0200	R0210	R0220	R0230	R0240	R0250	
Gross	(absolute amount)		Year		Prior	6-N	8-Z	N-7	9-N	S-N	N-4-N	N-3	N-2	N-1	Z	

Sum of years (cumulative)

C0180

8.039.522

8.041.641 8.596.885 7.907.507 7.099.252



70.442.106

3.864.538

6.715.992

5.760.568

Gross undiscounted Best Estimate Claims	Provisions	(-11-4-	(absolute	amount)	

					_			-									
			Year end	(discounted	Coaso	0000	210.006	200.012	346 005	000.040	343 584	467 476	640 002	1 111 227	1.56.111.1	3 014 581	100.11.000
						R0100	R0160	R0170	R0180	R0190	R0200	R0210	R0220	R0230	R0240	R0250	
														•		•	
				10&+	C0300												
				6	C0290		215.811										
				<b>∞</b>	C0280		91.784	229 044									
				7	C0270	X	171.850	95.466	347.869								
		ent year		9	C0260	$\bigvee$	300.217	437.312	199.059	1.031.958							
		Development year		S	C0250	$\bigvee$	373.626	487.386	357.913	282.234	350.311						
				4	C0240	$\bigvee$	477.134	555.376	525.759	574.648	414.957	476.035					
			10	m	C0230	$\bigvee$	606.410	859.993	573.341	687.725	1.665.215	387.770	699.258				
				71	C0220	$\bigvee$	1.236.553	987.875	750.667	871.466	1.741.495	602.710	608.004	1.146.479			
			,	ı	C0210	$\bigvee$	1	1.092.152	1.360.226	958.081	2.372.166	944.694	889.869	753.875	1.669.761		
Provisions			•	0	C0200	$\bigvee$	,		1.709.702	2.199.658	2.231.275	1.356.978	1.340.955	1.029.718	1.349.818	3.098.568	
Pro						R0100	R0160	R0170	R0180	R0190	R0200	R0210	R0220	R0230	R0240	R0250	
	(absolute amount)			rear		Prior	0-N	N-8	N-7	9-N	N-5	4-N	N-3	N-2	N-1	z	



8.968.986

Total R0260

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

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35					X	X
Ordinary share capital (gross of own shares)	R0010	1.504.800	1.504.800			$\times$
Share premium account related to ordinary share capital	R0030	_	-			
Iinitial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040	-	-			
Subordinated mutual member accounts	R0050	_				
Surplus funds	R0070	-	_			$\times$
Preference shares	R0090	-				
Share premium account related to preference shares	R0110	-				
Reconciliation reserve	R0130	8.703.909	8.703.909		$\times$	$\times$
Subordinated liabilities	R0140	-	><			
An amount equal to the value of net deferred tax assets	R0160	-			$\times$	
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180	-	-			
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds					X	X
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	-			X	X
Deductions						$\overline{}$
Deductions for participations in financial and credit institutions	R0230	-	-			$\overline{}$
Total basic own funds after deductions	R0290	10.208.709	10.208.709			
Ancillary own funds				$\geq <$	><	> <
Unpaid and uncalled ordinary share capital callable on demand	R0300	-		$\rightarrow$		$\times$
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	-		$\rightarrow$	TD	BAR
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330	-		1	1	1
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340	-				

Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC Other ancillary own funds R0390  Total ancillary own funds R0400  Available and eligible own funds Total available own funds to meet the SCR R0500 Total available own funds to meet the SCR R0510 Total available own funds to meet the SCR R0510 Total eligible own funds to meet the SCR R0540 Total eligible own funds to meet the MCR R0550 Total eligible own funds to meet the MCR R0550 R0580 SCR R0580 Sc29.095  MCR R0600 A,000,000  Ratio of Eligible own funds to MCR R0640 Eligible own funds to MCR R0640 Sc59.295  R0700 C0060 Reconciliation reserve Excess of assets over liabilities R0700 C0060 Reconciliation reserve Excess of assets over liabilities R0700 C0060 C0	Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350	_			1	
subparagraph of Article 96(3) of the Directive 2009/138/EC Other ancillary own funds R0390 Total ancillary own funds R0400  Available and eligible own funds Total available own funds to meet the SCR R0500 Total available own funds to meet the SCR R0510 Total eligible own funds to meet the MCR R0510 Total eligible own funds to meet the MCR R0510 Total eligible own funds to meet the MCR R0510 Total eligible own funds to meet the MCR R0550 Total eligible own funds to meet the MCR R0550 R0540 R0580 SCR R0580 S.629.095 MCR Ratio of Eligible own funds to MCR R0600 Reconciliation reserve Excess of assets over liabilities R0700 C0060 Reconciliation reserve Excess of assets over liabilities R0700 C0060 Reconciliation reserve Excess of assets over liabilities R0700 C0060 Reconciliation reserve Excess of assets over liabilities R0700 C0060 Reconciliation reserve Excess of assets over liabilities R0700 C0060 Reconciliation reserve R0720 C0ther basic own fund items R0730 Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds Reconciliation reserve Expected profits Expected profits included in future premiums (EPIFP) Life business R0700 C0070	Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360	-				X
Total ancillary own funds  Available and eligible own funds  Total available own funds to meet the SCR  R0500  Total available own funds to meet the MCR  R0510  Total eligible own funds to meet the SCR  R0540  Total eligible own funds to meet the MCR  R0550  R0580  SCR  R0580  R0580  R0580  R0580  R0600  R0600  R0600  Ratio of Eligible own funds to MCR  R0640  R06	subparagraph of Article 96(3) of the Directive	R0370	-				
Available and eligible own funds  Total available own funds to meet the SCR  R0500  Total available own funds to meet the MCR  R0510  Total eligible own funds to meet the SCR  R0540  Total eligible own funds to meet the SCR  R0540  Total eligible own funds to meet the MCR  R0550  R0560  R0580  SCR  R0580  R0600  R0600  Ratio of Eligible own funds to SCR  R0600  Ratio of Eligible own funds to MCR  R0600  R0600  Reconciliation reserve  Excess of assets over liabilities  R0700  C0060  R0710  Foresceable dividends, distributions and charges  R0720  Cther basic own fund items  R0730  Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds  R0740  R0750  Expected profits  Expected profits included in future premiums (EPIFP)  Life business  R0780  Total Expected profits included in future premiums	Other ancillary own funds	R0390	-				
Total available own funds to meet the SCR  Total available own funds to meet the MCR  R0510  Total eligible own funds to meet the SCR  R0540  Total eligible own funds to meet the SCR  R0540  Total eligible own funds to meet the MCR  R0550  Total eligible own funds to meet the MCR  R0550  R0580  SCR  R0580  R0580  S.629.095  MCR  R0600  Ratio of Eligible own funds to MCR  R0600  Reconciliation reserve  Excess of assets over liabilities  R0700  C0060  Reconciliation reserve  Excess of assets over liabilities  R0710  Total eligible own fund items  R0730  Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds  Reconciliation reserve  Expected profits  Expected profits included in future premiums (EPIFP)  Life business  R0780  Total Expected profits included in future premiums (EPIFP)  R0780  Total Expected profits included in future premiums  R0790  R	Total ancillary own funds	R0400	_				
Total available own funds to meet the MCR  R0510  10.208.709  10.2	Available and eligible own funds						
Total eligible own funds to meet the MCR  Total eligible own funds to meet the SCR  R0540  R0540  R0550  R0550  R0580  R0580  R0580  R0580  R0600  R0700  C0060  R0710  R0710  R0710  R0720  Cother basic own fund items  R0730  Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds  R0740  R0740  R0770  R0770  Expected profits  Expected profits included in future premiums (EPIFP)  - Life business  R0780  Total Expected profits included in future premiums (EPIFP)  - Non- life business  Total Expected profits included in future premiums		R0500	10.208.709	10.208.709		_	
Total eligible own funds to meet the MCR  R0550  R0550  R0580  R0580  R0580  R0580  R0580  R0580  R0600  Ratio of Eligible own funds to SCR Ratio of Eligible own funds to MCR  R0600  Reconciliation reserve  Excess of assets over liabilities  R0700  C0060  R0710  Foresceable dividends, distributions and charges  Other basic own fund items  R0730  Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds  Reconciliation reserve  R0760  R0740  R0760  R0770  R0780  R0780	Total available own funds to meet the MCR	R0510	2000 2000 2000 2000		-	-	X
SCR  R0580  R0580  S.629.095  MCR  R0600  Ratio of Eligible own funds to SCR  R0620  R0620  R181,36%  Ratio of Eligible own funds to MCR  R0640  R064	Total eligible own funds to meet the SCR	R0540	10.208.709	10.208.709	-	-	
MCR Ratio of Eligible own funds to SCR Ratio of Eligible own funds to MCR Ratio of Eligible own funds to MCR Ratio of Eligible own funds to MCR Ro640 Reconciliation reserve Excess of assets over liabilities Common shares (held directly and indirectly) Ro710 Foresceable dividends, distributions and charges Ro720 Other basic own fund items Ro730 Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds Reconciliation reserve Ro760 Expected profits Expected profits included in future premiums (EPIFP) - Life business Expected profits included in future premiums (EPIFP) - Non- life business Ro780 Total Expected profits included in future premiums	Total eligible own funds to meet the MCR	R0550	10.208.709	10.208.709	-	-	$\times$
Ratio of Eligible own funds to SCR Ratio of Eligible own funds to MCR Ratio of Eligible own funds to MCR Reconciliation reserve Excess of assets over liabilities Own shares (held directly and indirectly) Foresceable dividends, distributions and charges Other basic own fund items R0730 Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds Reconciliation reserve  Expected profits Expected profits included in future premiums (EPIFP) - Life business  Expected profits included in future premiums (EPIFP) - Non- life business  Total Expected profits included in future premiums  R0740 R0780  R0780  R0780  R0780	SCR	R0580	5.629.095		> <	$\times$	$\times$
Reconciliation reserve  Excess of assets over liabilities  Own shares (held directly and indirectly)  Foresceable dividends, distributions and charges  Other basic own fund items  Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds  Reconciliation reserve  Ro760  Expected profits  Expected profits included in future premiums (EPIFP) - Life business  Ro780  -  RO780  -  RO770  -  RO770  -  RO770  -  RO770  -  RO770  -  RO770  -  RO780	MCR	R0600	4.000.000		><	$\times$	$\times$
Reconciliation reserve  Excess of assets over liabilities  Own shares (held directly and indirectly)  Foreseeable dividends, distributions and charges  Other basic own fund items  Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds  Reconciliation reserve  Ro760  Expected profits  Expected profits included in future premiums (EPIFP) - Life business  Ro780  -  RO780	Ratio of Eligible own funds to SCR	R0620	181,36%		> <	><	> <
Excess of assets over liabilities  Own shares (held directly and indirectly)  Foreseeable dividends, distributions and charges  Other basic own fund items  Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds  Reconciliation reserve  R0760  Expected profits  Expected profits included in future premiums (EPIFP) - Life business  Expected profits included in future premiums (EPIFP) - Non- life business  R0780  -  R0780  -  R0780  -  R0780  -  R0780  -  R0780  -  R0780	Ratio of Eligible own funds to MCR	R0640	255,22%			$\geq$	> <
Excess of assets over liabilities  Own shares (held directly and indirectly)  Foreseeable dividends, distributions and charges  Other basic own fund items  Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds  Reconciliation reserve  R0760  Expected profits  Expected profits included in future premiums (EPIFP) - Life business  Expected profits included in future premiums (EPIFP) - Non- life business  R0780  -  R0780  -  R0780  -  R0780  -  R0780  -  R0780  -  R0780			C0060				
Excess of assets over liabilities  Own shares (held directly and indirectly)  Foreseeable dividends, distributions and charges  Other basic own fund items  Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds  Reconciliation reserve  Ro760  Expected profits  Expected profits included in future premiums (EPIFP)  - Life business  Expected profits included in future premiums (EPIFP)  - Non- life business  Ro780  -  RO780  -  RO780  -  RO780  -  RO780  -  RO780	Reconciliation reserve						
Own shares (held directly and indirectly)  Foreseeable dividends, distributions and charges  R0720  Other basic own fund items  Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds  Reconciliation reserve  R0760  Expected profits  Expected profits included in future premiums (EPIFP) - Life business  Expected profits included in future premiums (EPIFP) - Non- life business  R0780  Total Expected profits included in future premiums  P0790		R0700	C0060				
Foreseeable dividends, distributions and charges  Other basic own fund items  R0730  Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds  Reconciliation reserve  R0760  Expected profits  Expected profits included in future premiums (EPIFP) - Life business  Expected profits included in future premiums (EPIFP) - Non- life business  R0780  Total Expected profits included in future premiums  R0790	Own shares (held directly and indirectly)						
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds  Reconciliation reserve  R0740  Expected profits  Expected profits included in future premiums (EPIFP) - Life business  Expected profits included in future premiums (EPIFP) - Non- life business  R0780  R0780  R0780  R0780	Foreseeable dividends, distributions and charges	R0720	-				
matching adjustment portfolios and ring fenced funds  Reconciliation reserve  R0760  Expected profits  Expected profits included in future premiums (EPIFP) - Life business  Expected profits included in future premiums (EPIFP) - Non- life business  R0780  Total Expected profits included in future premiums  R0790	Other basic own fund items	R0730	-				
Expected profits  Expected profits included in future premiums (EPIFP) - Life business  Expected profits included in future premiums (EPIFP) - Non- life business  R0760  8.703.909  R0770  -  R0780  -  Total Expected profits included in future premiums  R0780  -  R0780		R0740	1.504.800				
Expected profits  Expected profits included in future premiums (EPIFP) - Life business  Expected profits included in future premiums (EPIFP) - Non- life business  R0780  Total Expected profits included in future premiums  P0790	Reconciliation reserve	R0760	8.703.909				
- Life business R0770 - Expected profits included in future premiums (EPIFP) - Non- life business R0780 - Total Expected profits included in future premiums R0790							
- Non- life business R0780  Total Expected profits included in future premiums P0790		R0770	-				
Total Expected profits included in future premiums		R0780	_				
		R0790	-				



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

-		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0100
Market risk-	R0010	2.050.763	$\times$	-
Counterparty default risk	R0020	672.779	$\times$	
Life underwriting risk	R0030	-		-
Health underwriting risk	R0040	52.371		-
Non-life underwriting risk	R0050	4.016.075		-
Diversification	R0060	1.465.547	$\geq$	
Intangible asset risk	R0070	-	><	
Basic Solvency Capital Requirement	R0100	5.326.441	$\geq$	
				-
Calculation of Solvency Capital Requirement	-	C0100	<del>-</del>	
Operational risk	R0130	385.965	-	=
Loss-absorbing capacity of technical provisions	R0140	-		-
Loss-absorbing capacity of deferred taxes	R0150	83.311	-	-
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	-	-	-
Solvency Capital Requirement excluding capital add-on	R0200	5.629.095	-	N=
Capital add-on already set	R0210	_	-	H
Solvency capital requirement	R0220	-	:=.	=
Other information on SCR			-	
Capital requirement for duration-based equity risk sub- module	R0400	-	-	-
Total amount of Notional Solvency Capital Requirements for remaining part	R0410	-	-	:=:
Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420	=	-	-
Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	R0430	-	-	-
Diversification effects due to RFF nSCR aggregation for article 304	R0440	-	-	-

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

Linear formula component for non-life					
insurance and reinsurance obligations					
		C0010			
MCR <sub>NL</sub> Result	R0010	1.967.667			
MCN <sub>N</sub> , result	Nooro	11,507,007		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
				C0020	C0030
Medical expense insurance and proportional reinsurance			R0020	-	_
Income protection insurance and proportional reinsurance			R0030	16.717	31.542
Workers' compensation insurance and			D0040		
proportional reinsurance  Motor vehicle liability insurance and			R0040	-	-
proportional reinsurance			R0050	9.264.499	8.315.934
Other motor insurance and proportional reinsurance			R0060	1.658.988	3.266.147
Marine, aviation and transport insurance and proportional reinsurance			R0070	-	855
Fire and other damage to property insurance and proportional reinsurance			R0080	141.523	104.849
General liability insurance and proportional reinsurance			R0090	3.507	19.719
Credit and suretyship insurance and proportional reinsurance			R0100	-	_
Legal expenses insurance and proportional reinsurance			R0110	-	-
Assistance and proportional reinsurance			R0120	-	-
Miscellaneous financial loss insurance and proportional reinsurance			R0130	-	-
Non-proportional health reinsurance			R0140	-	_
Non-proportional casualty reinsurance			R0150	-	-
Non-proportional marine, aviation and transport reinsurance			R0160	-	-
Non-proportional property reinsurance			R0170	-	-
Linear formula component for life					
insurance and reinsurance obligations		C0040			Str. Contract
MCR <sub>L</sub> Result	R0200	C0040			/ SUND

				Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
				C0050	C0060
Obligations with profit participation - guaranteed benefits			R0210	-	
Obligations with profit participation - future discretionary benefits			R0220	-	
Index-linked and unit-linked insurance obligations			R0230	4	
Other life (re)insurance and health (re)insurance obligations			R0240	-	
Total capital at risk for all life (re)insurance obligations			R0250		-
Overall MCR calculation		COOMO			
		C0070		-	
Linear MCR	R0300	1.967.667		-	
SCR	R0310	5.629.095		-	-
MCR cap	R0320	2.533.093		_	
MCR floor	R0330	1.407.274		-	
Combined MCR	R0340	1.967.667		-	
Absolute floor of the MCR	R0350	4.000.000		-	
uc-	-	C0070		ă	
Minimum Capital Requirement	R0400	4.000.000		-	

