2016 Solvency and Financial Condition Report

Nationale-Nederlanden Schadeverzekering Maatschappij N.V.

Capital management

Solvency and Financial

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Summary

Summary

NN Schade's approach to the Solvency and Financial Condition Report

This Solvency and Financial Condition Report ('SFCR') provides public quantitative and qualitative disclosures for Nationale-Nederlanden Schadeverzekering Maatschappij N.V. ('NN Schade') on Solvency II as required by the Solvency II legislation. NN Schade already discloses most of the information that is required to be included in the SFCR in its 2016 Annual Report. In order to ensure the most transparent and user-friendly approach, the information that is already included in the Annual Report is not duplicated in this SFCR. Therefore, this SFCR is prepared as a supplement to NN Schade's Annual Report. It includes all information required to be disclosed in the SFCR, either through a specific reference to the Annual Report or as supplemental information.

As required by the Solvency II legislation, this SFCR follows the required standard chapter layout.

The amounts disclosed in this SFCR are, consistent with the amounts in the Annual Report, in thousands of euros unless stated otherwise.

NN Schade is required to submit so-called Quantitative Reporting Templates ('QRTs') to its supervisor DNB. A subset of these QRTs, which are required to be publicly disclosed and which provide quantitative information in accordance with Solvency II as at 31 December 2016, are included in the appendix to this SFCR. To comply with the Solvency II legislation, the amounts in these QRTs are in thousands of euros.

The Solvency ratios, as well as the amount of own funds and Solvency Capital Requirement ('SCR') disclosed in the SFCR are not final until filed with the regulators.

Material changes in 2016

No material changes occurred in the business and performance, system of governance, risk profile, valuation for solvency purposes and capital management over the reporting period.

Acquisition Delta Lloyd

Reference is made to the section 'NN Group and NN Schade at a Glance-Possible impact Delta Lloyd acquisition' in the 2016 Annual Report of NN Schade and note 35 'Other events- Offer Delta Lloyd' in the 2016 Annual accounts of NN Schade.

NN Schade's Solvency II Capital ratio

NN Schade's Solvency II Capital ratio as at 31 December 2016 was 127%, reflecting Eligible Own Funds of EUR 484,857 thousand and an SCR of EUR 380,692 thousand.

The Solvency II ratio of NN Schade decreased to 127% from 135% at the end of 2015.

Eligible Own Funds decreased by EUR 10,360 thousand from EUR 495,217 thousand at 31 December 2015 to EUR 484,857 thousand at 31 December 2016. The decrease reflects capital flows to the shareholder. This was partially offset by operating return and positive market impacts.

Solvency Capital Requirement increased by EUR 13,363 thousand, from EUR 367,329 thousand at 31 December 2015 to EUR 380,692 thousand at 31 December 2016. The increase is driven both by non-market risks (composition of the insurance portfolio and the introduction of WGA-EBD Flex product on 1 January 2017) and market risk (larger mismatch in cash flow matching increases the interest rate risk and an increase of the investments in real estate increases the real estate risk).

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Business and Performance

A. Business and Performance

Introduction

This chapter of the SFCR contains general information on NN Schade, a simplified group structure and NN Schade's financial performance over 2016.

A.1 Business

General

Reference is made to the section 'NN Group and NN Schade at a Glance' in the 2016 Annual Report of NN Schade for the legal form of NN Schade and NN Schade's position within the legal structure of NN Group.

The supervisory authority responsible for financial supervision of NN Schade:

Dutch Central Bank (DNB) Westeinde 1 1017 ZN Amsterdam The Netherlands

The contact details of NN Schade's external auditor are:

Mr. E (Erik) Bleekrode RA KPMG Accountants N.V. Laan van Langerhuize 1 1186 DS Amstelveen The Netherlands

Information on the appointment of the external auditor is included in the section 'Corporate governance- External auditor' in the 2016 Annual Report of NN Schade.

Qualifying holdings

A 'qualifying' holding is a direct or indirect holding in NN Schade which represents 10% or more of the capital or of the voting rights or which makes it possible to exercise a significant influence over the management of that undertaking.

NN Schade is a fully owned subsidiary of Nationale-Nederlanden Nederland B.V. (NN Nederland) which in turn is a fully owned subsidiary of NN Insurance Eurasia N.V. IN Insurance Eurasia N.V. is fully owned by NN Group.

RRJ Capital II Ltd qualifies as holder of a qualifying holding in NN Group. On 19 December 2016, RRJ Capital II Ltd indirectly held 10.26% of the issued shares in NN Group via RRJ Capital Master Fund II L.P, Foxdale Asset Holding Ltd, Mayfair Asset Holding Ltd, Newton Asset Holding Ltd, Berkeley Asset Holding Ltd, Glasgow Asset Holding Ltd and Hemingway Asset Holding Ltd.

On 19 December 2016, RRJ, its owners and certain associated companies, received a Declaration of No Objection ('DNO') from the Dutch Central Bank ('DNB'), as referred to in section 3:95 of the Dutch Financial Supervision Act ('WfT'), to hold an interest in NN Group not exceeding 12.5% of the issued share capital of NN Group. On the date the DNO was issued by DNB, RRJ held an interest of 10.26% in the issued share capital of NN Group.

The immediate and ultimate owner of RRJ Capital II Ltd is Mr Ong Tiong Sin. RRJ Capital is a private equity firm specialising in special situations, buyouts and growth capital investments. It seeks to invest in energy, agriculture, healthcare, food, natural resources, consumer products, real estate and financial institutions. The firm targets investing in Asia with a focus on China and South East Asia. It invests between USD 50 million and USD 3 billion per deal. RRJ Capital was founded in February 2011 and is based in Hong Kong with an additional office in Singapore.

Material lines of business and related undertakings

Reference is made to section 'NN Group and NN Schade at a glance' and section 'Report of the Management Board' in the 2016 Annual report of NN Schade for more information on the material lines of business of NN Schade.

For information on any significant business events or other events that have occurred over the reporting period reference is made to the section 'Report of the Management Board- Financial developments' in the 2016 Annual Report of NN Schade and note 35 'Other events' in the 2016 Annual accounts of NN Schade.

Reference is made to the section 'Corporate governance' in the 2016 Annual Report of NN Schade for information on the governance and organisational structure of NN Schade.

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Simplified group structure

The simplified group structure as at 31 December 2016 is as follows:



A.2 Underwriting Performance ; A.3 Investment Performance

For information on underwriting and investment performance, reference is made to the section 'Report of the Management Board- Financial developments' in the 2016 Annual Report of NN Schade. For the underwriting performance, reference is made to QRT S.05.01.02 'Premiums, claims and expenses by line of business' and QRT S.05.02.01 'Premiums, claims and expenses by country' in the Appendix.

Further reference is made to Note 15 'Investment income' in the 2016 Annual accounts of NN Schade for information on income arising from investments by asset class and the components of such income.

Gains and losses on investments recognised directly in equity are disclosed in Note 9 'Equity'- revaluation reserve and in the statement of comprehensive income in the 2016 Annual accounts of NN Schade.

Information on investment in securitisations is included Note 3 'Available-for-sale investments' in the 2016 Annual accounts of NN Schade. Most of the investments in securitisations issued by third parties relate to debt instruments of structured entities regarding asset-backed securities ('ABS'), classified as loans.

A.4 Performance of other activities

NN Schade has no other activities.

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A.5 Any other information

Reference is made to the section 'Report of the Management Board' in the 2016 Annual Report of NN Schade for any other material information regarding the business and performance of NN Schade.

System of governance

B. System of Governance

Introduction

This chapter of the SFCR contains information on the system of governance of NN Schade in addition to governance information included in the NN Group 2016 Financial Report and disclosed on NN Group's website. The additional information includes relevant committees within the Management Board, a description of the main roles and responsibilities of key functions and NN Schade's approach to the 'fit and proper' requirements and to the Own risk and Solvency Assessment.

B.1 General information on the system of governance

This chapter describes the Risk and Finance Committee Structure and explains the responsibilities, members and interdependencies of each committee.

Over the course of 2016, NN Group reviewed its system of governance and considered improvements to its control framework. As a result, an updated system of governance was put in place as of January 2017. Framework improvements will be implemented over the course of 2017.

This chapter sets out the governance and control framework effective in 2016.

Structure of governance and changes in system of governance

For a description of the structure of NN Schade's administrative and management body, reference is made to Note 36 'Risk management' in the 2016 Annual accounts of NN Schade. This source also describes the main roles and responsibilities of these bodies, provides a brief description of the segregation of responsibilities within these bodies and describes relevant committees that exist within them.

MB committees

The Management Board of NN Schade performs the day-to-day management of NN Schade and the overall strategic direction of NN Schade.

The Charter of the Risk and Finance committees describes the Risk and Finance Committee Structure as instructed by NN Group and explains the responsibilities, memberships(s) and interdependencies of each committee. While the Management Board retains responsibility for the risk management of NN Schade, it has delegated certain other responsibilities to committees. These committees are the Enterprise Risk Committee, the Operational Risk Committee, the Product Risk Committee, the Model Committee, the Assets & Liabilities Committee and the Crisis Committee.

Roles and responsibilities of key functions

NN Schade is of the view that all the Solvency II key functions are organised in accordance with the applicable Solvency II regulations. All key function holders within NN Schade have passed the DNB fit and proper test. All the Solvency II key functions are able to carry out their duties objectively and free from undue influence and can report relevant findings directly to the relevant Board(s).

Risk function

Role

The Chief Risk Officer of NN Schade ('CRO') is the Head of the Risk function and is entrusted with the day-to-day responsibility for NN Schade's risk management function. The CRO steers an independent risk organisation which supports the first line in their decision making, but which also has sufficient countervailing power to prevent excessive risk taking. The CRO must ensure that the Management Board is at all times informed of, and understands the material risks to which NN Schade is exposed.

Responsibilities

Within the Management Board, the CRO is responsible for:

- · Setting, and monitoring compliance with, NN Schade's overall risk policies
- · Communicating NN Group's risk management strategy and ensuring that it is implemented throughout NN Schade
- Supervising the operation of NN Schade's risk management and business control systems
- Reporting NN Schade's risks, as well as the processes and internal business controls
- Taking risk management decisions with regard to matters which may have an impact on the financial results of NN Schade or its reputation, without limiting the responsibility of each individual Management Board member in relation to risk management

Compliance function

Reference is made to Note 36 'Risk management' in the 2016 Annual accounts of NN Schade for a description of the Compliance function.

Other functions

The Actuarial function is also considered a key function within NN Schade. For a description of this function, role and responsibilities and implementation in the NN Schade structure, reference is made to Note 36 'Risk management' in the 2016 Annual accounts of NN Schade .

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Remuneration is performed in line with the remuneration policies defined by NN Group. Reference is made to Note 20 'Staff expenses' as disclosed in the 2016 Annual accounts of NN Schade for information on the remuneration policy and practices regarding administrative, management and supervisory bodies and employees. Other information on remuneration is disclosed on NN Group's website: <u>https://www.nn-group.com/Who-we-are/Corporate-governance/Remuneration.htm</u>.

Transactions with related parties

Reference is made to Note 33 'Related parties' and Note 34 'Key management personnel compensation' in the 2016 Annual accounts of NN Schade for information about material transactions during the reporting period. Section B.7 in this SFCR contains more information on intragroup outsourcing arrangements. Transactions with people who exercise a significant influence on NN Schade and with members of the Management Board and Supervisory Board are disclosed in Note 34 'Key management personnel compensation' in the 2016 Annual accounts of NN Schade.

Adequacy of system of governance

The assessment of the adequacy of the system of governance of NN Schade to the nature, scale and complexity of the risks inherent in its business is disclosed in Note 36 'Risk management' in the 2016 Annual accounts of NN Schade.

Consistent use of risk management, internal control systems and reporting procedures

Reference is made to Note 36 'Risk management' in the 2016 Annual accounts of NN Schade for a description of how the risk management and internal control systems and reporting procedures are implemented consistently throughout the organisation.

Own risk and solvency assessment at group and entity level

NN Group did not make use of the option provided for in the third subparagraph of Article 246(4) of Directive 2009/138/EC to conduct the own risk and solvency assessments at the level of the group and at the level of any subsidiary in the group simultaneously. NN Schade makes use of the option provided for in the third subparagraph of Article 246(4) of Directive 2009/138/EC to conduct the own risk and solvency assessments at the level of the group of entities. The assessment is done for NN Schade, Movir N.V. and NN Non-Life Insurance N.V. as a whole.

B.2 Fit and proper requirements

For a description of NN Schade's specific requirements concerning skills, knowledge and expertise applicable to the persons who manage NN Schade, reference is made to Note 36 'Risk management' in the 2016 Annual accounts of NN Schade. For further information on NN Group Corporate Governance reference is made to the NN Group website: <u>https://www.nn-group.com/Who-we-are/Corporate-governance.htm</u>.

Requirements concerning skills, knowledge and expertise applicable to people who have other key functions, are included in the respective job profiles.

Various NN Schade policies and charters include provisions aiming to ensure that the persons who effectively run NN Schade and the persons fulfilling key functions are fit and proper. During recruitment all candidates must have the professional qualifications, knowledge and experience that are required for sound and prudent management ('fit') and be of good repute and have integrity ('proper'). In an early stage of the hiring process and preferably at the time a position has become vacant, an approval request is put forward to the external regulator (DNB or AFM).

For a description of NN Schade's process for assessing the fitness and the propriety of the persons who effectively run NN Schade, reference is made to article 1.4(f), 2.2(g) and 7(j) of the Charter of the Supervisory Board, which is available on the NN Group website: <u>https://www.nn-group.com/Who-we-are/Corporate-governance/Corporate-governance.htm</u>.

All persons holding key functions are assessed against both their performance objectives, leadership behaviours and any other requirements from their job profiles during the annual performance cycle and specifically during the year-end appraisal.

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

Description of NN Schade's risk management system

Reference is made to Note 36 'Risk management' in the 2016 Annual accounts of NN Schade for a description of the risk management system comprising of strategies, processes and reporting procedures, and how NN Schade is able to effectively identify, measure, monitor, manage and report, on a continuous basis, the risks on an individual and aggregated level, to which NN Schade is or could be exposed. In the same note, a description is included of how the risk management system including the risk management function are implemented and integrated into the organisational structure and decision-making processes of NN Schade.

Own Risk and Solvency Assessment (ORSA)

Business strategy and objectives, key risk appetite statements, risk and capital management are aligned in the ORSA in synchronisation with the yearly medium term business plan. The ORSA report supports the Management Board in assessing the overall risk and capital profile of the business under a wide range of scenarios.

The ORSA is defined as the entirety of the processes and procedures employed to identify, assess, monitor, manage and report the short and long term risks a (re)insurance legal entity faces or may face and to determine the own funds necessary to ensure that the entity's overall solvency needs are met at all times. In particular, ORSA:

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- Is a specific instrument within NN Schade's risk management system: it is a high level forward looking analysis on capital adequacy under a wide range of scenarios based on the current and emerging risk profile of an entity, given its strategy and risk appetite
- Does not serve to calculate the capital requirement, although capital add-ons can be considered as a result of ORSA
- Shall be an integral part of business planning. As such, ORSA is linked to the strategic management process and related decision-making framework as illustrated below:



Regular frequency

NN Schade prepares an ORSA at least once a year. In the ORSA, NN Schade articulates its strategy and risk appetite; describes its key risks and how they are managed; analyses whether or not its risks and capital are appropriately modelled; and evaluates how susceptible the capital position is to shocks through stress testing and scenario testing. Stress testing examines the effect of exceptional but plausible scenarios on the capital position of NN Schade. Stress testing can also be initiated outside ORSA, either internally or by external parties such as DNB and the European Insurance and Occupational Pensions Authority ('EIOPA'). The ORSA includes a forward looking overall assessment of NN Schade's solvency position in light of the risks it holds.

Monitoring between regular ORSAs: possible ad-hoc ORSA

To the extent necessary, the outcomes of ORSA are translated in ad-hoc ORSA triggers (i.e. events that lead to a significant shock in the risk profile and/or capital position), relevant metrics and/or indicators and management actions for identified material risks. Monitoring of the same is part of the regular control cycle.

The regular ORSA process as undertaken within NN Schade

Strategy and risk appetite

A thorough re-assessment of strategy is usually done once every 3-5 years or when material developments in the (external or internal) environment give rise to an earlier re-assessment. Yearly assessments are made in the first half of the year whether to adjust the strategy for developments in the past year and/or revised assumptions on the future. Setting (and adjusting) the risk appetite is inextricably part of strategy setting (and adjusting).

Risk Assessment

Key to ORSA is the identification of potentially solvency threatening risks by the management board, given their strategy and risk appetite. Basis for this risk assessment is NN Group's risk taxonomy. Modelled risks are subject to an appropriateness test (see below) and additional statistical stress testing (see below), both contributing to adequate capitalisation of these risks. Focus is therefore on non-modelled risks.

Appropriateness test of regulatory capital calculation

The assumptions and models for calculating regulatory solvency requirements are assessed against the actual risk profile. Differences are analysed in terms of future model improvements and/or non-modelled risks. The outcome of the analysis may lead to mitigating actions to overcome model shortcomings. If the deviations or uncertainties are considered material, quantification of the deviation is necessary in order to consider a (temporary) self-imposed capital add-on.

Capital and capital projections

The recognition and valuation bases for internal capital projections are the same as those used for regulatory solvency reporting and consistent with the best-estimate assumptions and parameters used for the Business Plan best estimate financial forecasts, among others the yearly updated Macro Economic Scenario.

Regulatory solvency is at the heart of ORSA: NN Schade must ensure that it is able to meet regulatory required solvency ratios. In addition, NN Schade assesses:



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- The quantity and quality of Own Funds over the Business Plan period
- The composition of Own Funds across tiers and how this composition may change as a result of redemption, repayment and maturity dates during the Business Plan period

As -in principle- only NN Group raises capital in the financial markets, the group-wide ORSA is to:

- Identify internal and external sources of capital if additional new capital is necessary
- Assess availability, transferability and fungibility of capital within the group, with special attention for businesses in non-EEA countries
- Reference any planned material transfer of capital within the group and its consequences
- Determine the capital plan for funding the capital needed by the subsidiaries

Stress testing and overall assessment of capital adequacy

Based on the Business Plan and the outcomes of the ORSA risk assessment, (reverse) stress scenario's and their parameters are developed and documented. The Management Board is responsible for identifying the key uncertainties and the related scenarios.

Scenario testing, as well as (reverse) stress testing are required for each ORSA. When the outcomes of performed stress tests show solvency ratios dropping below 100%, realistic strategies for recovering solvency ratios will be considered and documented in the ORSA report. For NN Schade, a capital downstream can only be considered if there is no other feasible management option left.

Ultimately, after all assessments and considerations (including formulated management actions) the ORSA is to conclude whether, going forward, the entity concerned is adequately capitalised under a wide range of scenarios over the planning horizon.

Governance of NN Schade's Partial Internal Model

The model governance and validation function seeks to ensure that the models are fit for their intended purpose. Models, assumptions and their disclosed metrics are approved by the Model Committee NN Non-life and where appropriate by the Model Committee NN Group ('MoC'). The model validation function carries out validations of the risk and cash flow models related to Solvency II. The findings of the model validation function are reported for acceptance to the Model Committee NN Non-life. This committee is responsible for modelling policies, processes, methodologies, and parameters which are applied within NN Schade particular those related to Solvency II.

Central models are developed at Group level, but NN Schade is informed on the design through the Model Board and performs a fit-for-localuse assessment to assess the fit to the NN Schade risk profile. The Model Board is linked to the MoC and processes model changes and informs the Business Units about model related issues.

Model validation is not a one-off assessment of a model, but an ongoing process whereby the reliability of the model is verified at different stages during its lifecycle: at initiation, before approval, when the model has been redeveloped or modified and on a regular basis discussed and agreed with model development. It is not a mere verification of the mathematics or statistics of the model, but encompasses both a quantitative and qualitative assessment of the model. Accordingly, the validation process encompasses a mix of developmental evidence assessment, process verification and outcome analysis. The validation cycle is based on a three to five year period depending on materiality.

Changes in the governance of NN Schade's partial internal model

During 2016 no material changes to the governance of NN Schade's partial internal model were made.

B.4 The Internal control system and compliance function; B.5 Internal audit function; B.6 Actuarial function

Reference is made to Note 36 'Risk management' of the 2016 Annual accounts of NN Schade for a description of the implementation of the Internal control system, compliance, internal audit and actuarial function.

B.7 Outsourcing

External Outsourcing arrangements

In 2016 an outsourcing arrangement was in effect regarding the claim settlement and claim expertise for NN Schade through Van Ameyde Services B.V. ('VAS'), a specialised claim handling company. VAS is an entity owned by NN Schade and Van Ameyde Nederland B.V. There are no significant provisions for doubtful debts or individually significant bad debt expenses recognised on outstanding balances with VAS.

In addition, NN Group outsourced part of its IT processes to external service providers. There are no significant provisions for doubtful debts or individually significant bad debt expenses recognised on outstanding balances with these providers.

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For these external outsourcing arrangements written service level agreements are in place, setting out:

- The mutual rights and obligations of the parties
- The duties and responsibilities of all parties involved
- The Service Provider's commitment to comply with applicable local laws and regulatory requirements, applicable to the outsourced function or activity and to cooperate with the Outsourcing Entity's relevant supervisory authority with regard to the outsourced function or activity
- The Service Provider's obligation to disclose any development which may have a material impact on its ability to carry out the outsourced functions and activities effectively and in compliance with applicable laws and regulatory requirements
- That the Service Provider and the Outsourcing Entity can only terminate the contract with a notice period and that this notice period is to be defined yearly by both parties
- That the Outsourcing Entity is able to terminate the arrangement for outsourcing where necessary without detriment to the continuity and quality of its provision of services to policy holder and other clients
- That the Outsourcing Entity reserves the right to be informed about the outsourced functions and activities and their performance by the Service Provider as well as a right to issue general guidelines and individual instructions at the address of the Service Provider, as to what has to be taken into account when performing the outsourced functions or activities

Intra-group Outsourcing arrangements

In the normal course of business, NN Group entities enter into various transactions with entities within the consolidated Group. Transactions with entities within the consolidated Group take place on an arm's length basis and include distribution agreements, human resources-related arrangements and rendering and receiving of services. There are no significant provisions for doubtful debts or individually significant bad debt expenses recognised on outstanding balances within the Group.

All intra-group transactions are conducted under market-consistent conditions. Included in the intra-group transactions were the following:

- · Facility services carried out by group companies
- Various other shared services, including finance and information technology, carried out by group companies
- Staff of the insurance entities within NN Group in the Netherlands is employed by NN Insurance Personeel B.V. NN Schade is charged for its staff expenses by NN Insurance Personeel B.V., under a service level agreement. Although these costs are not paid out in the form of salaries, they do have the character of staff expenses and they are therefore recognised as such. A staff provision for holiday entitlement and bonuses is recognised at NN Insurance Personeel. Actual spending is charged to the NN Schade as per the contract with NN Insurance Personeel B.V.
- Transactions between NN Group and NN Schade concerning the payment of tax, as NN Group heads the fiscal unity in the Netherlands
- NN Re (Netherlands) N.V. carries out reinsurance activities of NN Schade
- The transactions in financial instruments, namely shares, bonds, loans (excluding mortgage loans) and derivatives, are conducted via a management agreement with NN Investment Partners B.V. NN Investment Partners B.V. makes use of Nationale-Nederlanden Interfinance B.V. for the execution of the transactions involving derivatives
- Zicht B.V. acts as an authorised agent for NN Schade
- Mandema & Partners B.V., a group company of NN Group, acts as an authorised agent for NN Schade. Mandema and Partners B.V was sold in 2016. After the closing of this transaction in January 2017, Mandema & Partners B.V. is no longer part of NN Group
- NN Bank is the servicing and originating partner for mortgage loans held by NN Schade

For intra-group outsourcing arrangements, a written service level agreement is normally in place - similar to the one used for external service providers-.

B.8 Any other information

Reference is made to the section 'Corporate Governance' in the 2016 Annual report of NN Schade and the NN Group website: <u>https://www.nn-group.com/Who-we-are/Corporate-governance/Corporate-governance</u> for other material information regarding the system of governance of NN Schade and NN Group.

Risk profile

C. Risk Profile

Introduction

This chapter of the SFCR contains information on the risk profile of NN Schade and information on the 'prudent person principle' used when investing.

Risk profile per risk category

Reference is made to Note 36 'Risk management' in the 2016 Annual accounts of NN Schade for quantitative and qualitative information on the risk profile per risk category. The following risk categories have been disclosed:

C.1 Underwriting risk

Underwriting risk is disclosed as insurance risk and business risk in Note 36 'Risk management' in the 2016 Annual accounts of NN Schade.

C.2 Market risk

Market risk is disclosed in Note 36 'Risk management' in the 2016 Annual accounts of NN Schade.

C.3 Credit risk

Credit risk is disclosed in Note 36 'Risk management' in the 2016 Annual accounts of NN Schade.

C.4 Liquidity risk

Liquidity risk is disclosed in Note 36 'Risk management' in the 2016 Annual accounts of NN Schade.

C.5 Operational risk

Operational risk is disclosed in Note 36 'Risk management' in the 2016 Annual accounts of NN Schade.

C.6 Other material risks

Compliance risk

Reference is made to Note 36 'Risk management' in the 2016 Annual accounts of NN Schade for information on compliance risk.

Concentration risks

NN Schade does not have an appetite for risk concentration and manages concentration risk with a limit structure. More information on the mitigation of several types of concentration risk is included in Note 36 'Risk management' in the 2016 Annual accounts of NN Schade.

Investing assets in accordance with the 'Prudent person principle'

Acceptable investments

NN Group maintains a Global Asset List, which contains all asset classes in which subsidiaries of NN Group are allowed to invest. Before an asset class is approved for this list, a New Investment Class Approval & Review Procedure ('NICARP') must be followed.

The NICARP should describe all relevant considerations on return, risk and operational consequences that are relevant to the decision whether a Business Unit of NN Group should invest in the proposed investment class.

The NICARP request does not describe a specific transaction, but is a proposal for the potential investment in an investment class. The NICARP should nevertheless address the quantitative impact of potential future investments and include proposed portfolio limits for the product. This should always be in line with NN Group internal policies as well as external constraints (such as regulatory limits).

Investment decisions: GITA

The intention of a Global Investment Transaction Approval ('GITA') request is to obtain approval for a specific investment (transaction or program). The GITA should always be combined with the locally approved investment approval. The GITA request itself is an overlay form on this investment proposal that should allow NN Group to validate that the proposed investment is in line with NN Group risk appetite and Business Unit strategic asset allocation.

Governance of investments

Within the three lines-of-defence model, investments are managed in the first line through a dedicated Central Investment Office, reporting directly to the CEO of NN Group. The second line function DCRO (Deputy CRO) reports to the CRO of NN Schade. All stakeholders regularly meet in the Asset and Liability Committee ('ALCO') for discussing the most material issues. ALCO is involved in (but not limited to) oversight of market and investment risk taking, the definition of an investment strategy applicable to certain mandates and/or local financial markets, discussing quarterly figures and insights in interventions before end of quarter and capital position, risk metrics and balance sheet. Operational activities regarding investments are performed by NN Group's Business Unit NN Investment Partners, who also provides (unsolicited) advice on proposed or current investments.

Risk profile

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All investment related activities are performed within the boundaries as set by NN Group. These include among others the following:

- Asset-Liability Management-Strategic Asset Allocation ('ALM-SAA') Policy
- NICARP and Global Asset List
- Investment Mandate Policy
- Concentration Risk Policy
- Hedging Policy

Chief Investment Officer

Based on market views, local Business Unit requirements, input from its assets managers, the Chief Investment Officer will:

- · Propose Investment Strategies for NN Group as well as for NN Schade
- Prepare proposals for mandates and for delegated approval levels for the Asset Managers
- Propose Investment ideas to the Group Investment Office
- · Prepare Performance Measurement Guidelines of all investment decisions taken under the delegated approval authorities

NN Investment Partners prepares a market view, proposes investment ideas based on market developments and Business Unit requirements and makes investment decisions within allocated limits/thresholds. NN Investment Partners executes the Performance Measurement Guidelines as prepared by the Chief Investment Officer.

IFRS net result sensitivity analysis

Reference is made Note 36 'Risk management' in the 2016 Annual accounts of NN Schade for a description of the methods used, the assumptions made and the outcome of stress testing and sensitivity analysis for material risks and events.

Own funds sensitivity analysis

Reference is made to Note 36 'Risk management' in the 2016 Annual accounts of NN Schade for the outcome of the NN Schade Own Funds at Risk ('OFaR') analysis, the loss of Own Funds in a 1-in-20 year scenario.

Other material risks

Reference is made to the section 'Report of the Management Board' in the 2016 Annual report of NN Schade for any other information on any other material risks.

Risk exposure from off-balance sheet positions and transfer of risk to special purpose vehicles

Reference is made to Note 36 'Risk management' in the 2016 Annual accounts of NN Schade regarding the risk exposure of NN Schade, including the exposure arising from off-balance sheet positions and describing the measures used to assess these risks.

As at 31 December 2016, no material risks were transferred to special purpose vehicles outside NN Schade.

C.7 Any other information relevant to the risk profile of NN Schade

Techniques used for mitigation of risks

Reference is made to Note 36 'Risk management' in the 2016 Annual accounts of NN Schade for a description of the techniques used for mitigating risks and the processes for monitoring the continued effectiveness of these risk mitigation techniques.

No other material information is relevant to the risk profile of NN Schade.

Valuation for Solvency purposes

D. Valuation for Solvency Purposes

Introduction

This chapter of the SFCR contains information on the valuation for solvency purposes of assets, insurance liabilities and other liabilities of NN Schade and explains the differences with their valuations in the NN Schade 2016 Annual accounts.

Reconciliation IFRS Balance sheet to Solvency II Balance sheet

Reconciliation in R3 balance sheet to Solvency in balance sheet		Presentation	Valuation	
As at 31 December 2016.	IFRS	differences	differences	Solvency II
Assets				
Cash and cash equivalents	4,342			4,342
Available-for-sale investments	2,200,642	37,000	89	2,237,732
Loans and advances	700,680	2,171	41,533	744,383
Reinsurance contracts	41,545		-4,478	37,067
Associates	10,327			10,327
Intangible assets	1,019		-1,019	
Deferred acquisition costs	37,625		-37,625	
Other assets	154,532	-39,172		115,361
Total assets	3,150,712		-1,500	3,149,211
Equity				
Shareholders' equity	539,146		-54,289	484,857
Total equity / Excess of assets over liabilities	539,146		-54,289	484,857
Liabilities				
Other borrowed funds	54,500	-113		54,387
Insurance contracts	2,442,995		70,915	2,513,910
- non-trading derivatives	9			9
Other liabilities	114,062	113	-18,126	96,048
Total liabilities	2,611,566		52,789	2,664,354
Total equity and liabilities	3,150,712		-1,500	3,149,211

1 Investments consists of the IFRS Balance sheet items 'Financial assets at fair value through profit or loss' and 'Available-for-sale investments'.

Reference is made to the 2016 Annual accounts of NN Schade for more detailed information on the IFRS Balance sheet. Reference is made to QRT S.02.01.02 'Balance sheet' in the Appendix for the full Solvency II Balance sheet. The values in these tables may differ from those included in Note 36 'Risk Management' in the 2016 Annual accounts of NN Schade due to classification and valuation differences to reflect a risk management view.

The valuation and presentation differences between IFRS and Solvency II resulting from differences in accounting principles and methods are explained in the sections below. For items where no valuation difference occurred, reference is made to Note 1 'Accounting policies' and Note 25 'Fair value of financial assets and liabilities' in the 2016 Annual accounts of NN Schade for a description of the bases, methods and main assumptions used for their valuation.

The presentation differences relate to the presentation of accrued interest. The most important valuation differences are related to loans and technical provisions. Details of these and other valuation differences are included in Section D.1- D.3 below.

D.1 Assets

Accounting principles, methods and main assumptions used

In general, Solvency II valuation requires a market consistent approach to the valuation of assets and liabilities. The default reference framework for valuing assets and liabilities, other than technical provisions, is IFRS as endorsed by the European Union ('IFRS-EU'). The exception is if the IFRS valuation principle does not reflect a market consistent valuation (e.g. amortised cost). For main assumptions used in fair valuing assets, reference is made to Note 25 'Fair value of financial assets and liabilities' in the 2016 Annual accounts of NN Schade.

Cash and cash equivalents

In the IFRS balance sheet, cash and cash equivalents are reported at the notional amount. In the Solvency II balance sheet, cash and cash equivalents are reported at market value. There are no significant valuation differences between IFRS and Solvency II for cash and cash equivalents as the market value is not significantly different from the notional value.

Investments (excluding loans)

In the IFRS balance sheet, investments are reported at fair value. In the Solvency II balance sheet, investments are reported at market value. There are no significant valuation differences between IFRS and Solvency II for investments as fair value generally equals market value. Presentation differences of EUR 37,000 thousand as at 31 December 2016 are caused by presentation of accrued interest as part of the

Valuation for Solvency purposes

Continued

investments, instead of a separate presentation as accrual under IFRS. Solvency II requires accrued interest to be presented as part of the investments ('dirty market value') and not separately as other assets as in the 2016 Annual accounts of NN Schade ('clean market value').

Loans

In the IFRS balance sheet, loans are reported at amortised cost. In the Solvency II balance sheet, loans are reported at market value. For loans that are repriced frequently and have had no significant changes in credit risk, the carrying values in the 2016 Annual accounts of NN Schade represent a reasonable estimate of the market value for Solvency II. For other loans the market value is estimated by discounting expected future cash flows using a discount rate that reflects credit risk, liquidity and other current market conditions. The market value of mortgage loans is estimated by taking into account prepayment behaviour. Loans with similar characteristics are aggregated for calculation purposes.

Valuation differences between IFRS and Solvency II for loans represents the difference between amortised cost and market value of EUR 41,533 thousand as at 31 December 2016. Presentation differences of EUR 2,171 thousand as at 31 December 2016 are caused by the different presentation of accrued interest. Solvency II requires accrued interest to be presented as part of the loans ('dirty market value') and not separately as other assets as in the 2016 Annual accounts of NN Schade ('clean market value').

Reinsurance contracts

Reference is made to section D2 'Technical provisions'.

Associates (Holdings in related undertakings)

In the IFRS balance sheet, associates are reported at net asset value (equity accounting).

All holdings in related undertakings were either valued using quoted market prices in active markets or by using the adjusted equity method (when a stock listing was not available).

Intangible assets

Goodwill and Value of Business Acquired ('VOBA') are not recognised for Solvency II purposes. Other intangibles including software can be recognised and measured at a value other than nil if they can be sold separately and if there is a quoted market price in an active market for the same or similar intangible assets. As there is no quoted market price for NN Schade's other intangible assets, it is valued at nil for Solvency II purposes.

Deferred acquisition costs (DAC)

Deferred Acquisition Costs are not recognised for Solvency II purposes.

Other assets

In the IFRS balance sheet, other assets are reported at their notional amounts. In the Solvency II balance sheet, other assets (with the exclusion of deferred taxes) are reported at market value. There are no significant valuation differences between IFRS and Solvency II for other assets as the market value is not significantly different from the notional value.

Presentation differences of EUR 39,172 thousand as at 31 December 2016 consist of the different presentation of accrued interest. Solvency II requires accrued interest to be presented as part of the interest bearing investments ('dirty market value') and not separately as other assets as in the 2016 Annual accounts of NN Schade ('clean market value').

Deferred taxes

Under IFRS, deferred tax assets are part of the other assets. In the IFRS balance sheet, deferred taxes, other than deferred tax assets arising from the carry forward of unused tax credits and the carry forward of unused tax losses, are valued on the basis of the difference between the tax bases of assets and liabilities and their carrying values. A positive value to deferred taxes is only attributed where it is probable that future taxable profit will be available against which the deferred tax asset can be used, taking into account any legal or regulatory requirements on the time limits relating to the carry forward of unused tax losses or credits.

Reference is made to Note 24 'Taxation' in the 2016 Annual accounts of NN Schade for more information on the origin of the recognition of deferred tax assets and the amount and expiry date of deductible temporary differences, unused tax losses and unused tax credits for which no deferred tax asset is recognised in the IFRS balance sheet.

In the Solvency II balance sheet, deferred tax assets and liabilities are recognised and valued in conformity with IFRS. However, the differences in valuation of assets and liabilities as set out in sections D.1 'Assets', D.2 'Technical provisions' and D.3 'Other liabilities' result in an decrease of EUR 18,126 thousand of deferred tax liabilities recognised in the Solvency II balance sheet as at 31 December 2016.

Changes in valuation bases

During 2016, no material changes were made to the recognition and valuation bases, or estimations used, in the measurement of assets on the Solvency II balance sheet.

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D.2 Technical provisions ('Insurance contracts')

Value of the technical provisions

The value of technical provisions, including the amount of the Best Estimate of Liabilities ('BEL') and the Risk Margin ('RM') is disclosed below separately for each material line of business as at 31 December 2016:

Value of technical provisions by Solvency II Business Line

	BEL	Risk margin	l echnical provisions
Technical provision by Solvency II Business line:			
1. Non-Life	694,195	35,564	729,759
2. Health similar to Non-Life	156,948	9,672	166,620
3. Health similar to Life	1,552,683	64,849	1,617,531
Total	2,403,825	110,085	2,513,910

Bases, methods and main assumptions used for solvency valuation

Technical Provisions are measured for Solvency II purposes as the sum of the BEL and a RM. The BEL is equal to the probability-weighted average of the present value of the future liability cash flows. The RM is defined as the amount that an empty (re)insurance entity is expected to require in excess of the BEL in order to take over and meet the (re)insurance obligations.

Best estimate of liabilities

NN Schade uses cash flow models and best estimate assumptions to determine the BEL under Solvency II. Premiums, benefits, expenses and other relevant cash flows are projected for the policy term – subject to contract boundaries – and discounted at the currency specific risk-free interest rate term structure to allow for financial risk with currency specific Credit Risk Adjustments ('CRA') and country specific Volatility Adjustment ('VOLA'). This is the full-cash flow approach and is typical for traditional business. Cash flows are projected on a combination of per policy basis and portfolio level.

Cash flows are projected deterministically since NN Schade does not have material embedded options or guarantees.

The cash flow projections used in the calculation of the BEL are based on the best estimate assumptions. The cash flow projection reflects the expected realistic future demographic, legal, medical, technological, social, environmental and economic developments that will have a material impact on the BEL.

For each material line of business, a quantitative and qualitative explanation of material differences between the bases, methods and main assumptions used for the valuation for solvency purposes and those used for their valuation in financial statements are included in the Actuarial Function Report ('AFR') prepared by the local Actuarial Function Holder ('AFH').

NN Schade reports a relatively small portion of unmodelled Technical Provisions. For unmodelled business, Technical Provisions are estimated either by scaling of modelled business or by setting Solvency II Technical Provisions equal to IFRS provisions. Where these approaches are taken, the AFH has provided an opinion that the approaches are acceptable given the materiality of the Technical Provisions.

Reinsurance and other recoverables

The BEL are estimated gross, without deduction of the amounts recoverable from reinsurance contracts. The amounts recoverable from reinsurance contracts and expected losses due to counterparty default are calculated separately. The principles used to calculate the amounts recoverable are consistent with those underlying the calculation of the gross BEL.

Risk margin

In addition to the BEL a RM is held to allow for non-hedgeable market and non-market risks. The calculation of the RM is performed by using a driver approach. Long term guarantee ('LTG') measures are excluded from the discounting, when calculating the RM.

With the driver approach, the relevant sub-risk SCRs are projected using appropriate risk drivers, multiplied by the cost of capital of 6%, then discounted at the relevant risk free rate term structure. The sub-risk market value margins are aggregated using the relevant diversification factors. Note that this is a simplification as Solvency II requires the individual SCRs to be diversified at each future point in time. NN Schade's simplification does not lead to a material misestimation of the RM (less than 1%).

Assumptions

Non-financial assumptions

Best estimate assumptions are set for expenses, mortality, morbidity and other relevant insurance risks using historical experience of the insurance portfolio. Assumptions are reviewed by NN Schade at least annually and submitted to the Model Committee ('MoC') for approval, following NN Schade's model governance.

Policyholder behaviour regarding lapses, are taken into account subject to the boundaries of the contracts.

Valuation for Solvency purposes

Continued

Boundaries of insurance contracts for all products except Individual Disability are set equal to the contract term. For Individual Disability policies, the contract boundaries are set equal to the policy terms, taking the 'en bloc' practices of NN Schade into account.

Financial assumptions

NN Schade follows EIOPA requirements in determining the basic risk-free rates and the VOLA to determine the relevant currency specific risk free rate term structure for valuation of Technical Provisions. Because EIOPA curves are not available in time for NN Schade to start their valuations, NN Schade follows NN Group using the EIOPA methodology to independently produce the curves. These are then compared to the published EIOPA curves when these are made available to ensure consistency between the EIOPA and the NN Schade manufactured curves. At year-end 2016, the EIOPA and NN Schade curves were consistent.

Changes in assumptions

During 2016, best estimate assumptions were reviewed and updated where necessary. No material assumption changes were implemented.

Options and guarantees

NN Schade does not have material options and guarantees in the insurance liabilities.

Level of Uncertainty

For the level of uncertainty associated with the value of the technical provisions, reference is made to the Own funds at risk-Insurance risk in Note 36 'Risk Management' in the 2016 Annual accounts of NN Schade.

Main differences between IFRS and Solvency II valuation of technical provisions

		Valuation	
	IFRS	differences	Solvency II
Technical provision by Solvency II Business line:		-	
1. Non-Life	795,351	-65,592	729,759
2. Health similar to Non-Life	188,049	-21,429	166,620
3. Health similar to Life	1,459,596	157,936	1,617,531
Total	2,442,995	70,915	2,513,910

Summary of main differences between IFRS and Solvency II as at 31 December 2016

At 31 December 2016, the valuation differences between the insurance and investment contracts recognised in the IFRS balance sheet and the technical provisions recognised in the Solvency II balance sheet of NN Schade amounted to EUR 70,915 thousand. Methods and models used in calculating Solvency II technical provisions and IFRS insurance liabilities differ substantially. The main valuation differences between IFRS and Solvency II are outlined below:

- Insurance liabilities in the IFRS Balance sheet are established in accordance with IFRS 4 'Insurance Contracts'. Under IFRS 4, an insurer may
 continue its existing pre-IFRS accounting policies for insurance contracts, provided that certain minimum requirements are met. Upon
 adoption of IFRS-EU in 2005, NN Schade decided to continue the then existing accounting principles for insurance contracts under IFRS-EU.
 This means the application of accounting standards generally accepted in the Netherlands ('Dutch GAAP') for the provisions for liabilities
 under insurance contracts
- The BEL in Solvency II are calculated as the expected present value of future liability cash flows using best estimate assumptions
- A RM for non-hedgeable risks is added to the BEL to establish the Solvency II technical provisions
- Different interest rates are used for calculation of insurance contracts under IFRS and Solvency II. For Solvency II a risk-free interest rate curve with credit risk and VOLA where applicable is used. A matching adjustment is not applied. For IFRS a fixed interest rate/guaranteed technical interest rate is used, and for certain non-life insurance contracts discounting is not applied
- The present value of future profits is recognised in Solvency technical provisions but not in IFRS reserves

Matching and volatility adjustment, transitional measures, and transitional risk-free interest rate-term structure

QRT S.22.01.21 'Impact of long term guarantees and transitional measures' in the Appendix provides the quantitative impact of excluding the socalled Long Term Guarantee ('LTG') measures and Transitional measures from own funds and the SCR. QRT S.22.01.21 mandate disclosure of the quantitative impact of excluding:

- Transitional measures in respect of technical provisions
- · Transitional measures in respect of interest rates
- Volatility adjustment ('Vola')
- Matching Adjustment ('MA')

Valuation for Solvency purposes

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- Technical provisions
- Basic own funds
- Eligible own funds to meet Solvency Capital Requirement
- Solvency Capital Requirement ('SCR')

All the elements of which the impact is excluded in this QRT are an integral part of the Solvency II framework. The resulting own funds and SCR should therefore not be seen as a replacement of, or alternative for, the own funds and SCR as determined in accordance with Solvency II. For NN Schade, the Vola is of relevance given its liability profile and its approach to match cash-flows of these liabilities with corresponding fixed income instruments. Transitional measures in respect of technical provisions and interest rates and Matching Adjustment are not applied by NN Schade.

Volatility adjustment ('Vola')

NN Schade applies the yield curve as published by EIOPA for the calculation of the technical provisions under Solvency II. In line with Solvency II regulations, this yield curve includes a Vola component. As at 31 December 2016, the level of the Vola for the Euro currency was 13 bps.

The application of the Vola resulted in a reduction of EUR 20.485 thousand in technical provisions, contributing EUR 15.447 thousand (after tax) to Basic own funds as at 31 December 2016. Excluding the Vola from the calculation of technical provisions would reduce the eligible own funds by EUR 15.447 thousand.

In the calculation of the SCR, NN Schade assumes no change in Vola after a shocked-event but reflects the illiquidity of liabilities in the asset shocks to ensure appropriate solvency capital requirements. This 'Dynamic Vola' approach is approved by DNB, in particular to ensure appropriate risk incentives on asset allocation decisions. NN Schade also shocks all government bonds and its mortgage portfolio in the calculation of spread risk capital requirements in the SCR. Under the standard formula no capital is required to be held against spread risk arising from these assets.

If the Dynamic Vola would be excluded from the SCR calculation, the modelling approach for spread risk on government bonds and mortgages would need to be adjusted accordingly. However, for the completion of QRT S.22.01.21 'Impact of long term guarantees and transitional measures' in the Appendix, NN Schade is required to reflect only the impact of excluding the Vola from eligible own funds and the SCR, without adjusting for the spread risk on government bonds and mortgages.

The table below shows the impact of excluding both the Dynamic Vola as well as spread risk on government bonds from the SCR, in combination with removing the Vola from eligible own funds. In such scenario, the SCR would be EUR 31.925 thousand higher and eligible own funds would be EUR 15.447 lower.

Amount without Long Term Guarantee measures and transitionals

	Amount with Long Term Guarantee measures and transitionals	Impact of volatility adjustment set to zero and eliminating additional credit spread shock	Amount without Long Term Guarantee measures and transitionals
	(A)	(B)	(C) =(A)-(B)
Technical provisions	2,513,910	20,485	2,534,395
Basic own funds	484,857	-15,447	469,411
Eligible own funds to meet Solvency Capital Requirement (1)	484,857	-15,447	469,411
Solvency Capital Requirement (2)	380,692	31,925	412,617

D.3 Other liabilities

Other borrowed funds

In the IFRS balance sheet, other borrowed funds are reported at amortised cost. In the Solvency II balance sheet, these borrowings are reported at market value, excluding an adjustment for NN Schade's own credit risk. In Solvency II market value, (a change in) the own credit risk is not taken into account. The Solvency II market value of other borrowed funds, is generally based on quoted market prices or, if not available, on prices estimated by discounting expected future cash flows using a current market interest rate and credit spreads applicable to the yield, credit quality and maturity.

Presentation differences include the different presentation of accrued interest amounting to EUR 113 thousand as at 31 December 2016. Solvency II requires accrued interest to be presented as part of the interest bearing liabilities ('dirty market value') and not separately as other assets as in the 2016 Accounts of NN Schade ('clean market value').

Other liabilities

Part of the other liabilities are the deferred tax liabilities. In the Solvency II balance sheet, deferred tax assets and liabilities are recognised and valued in conformity with IFRS (reference is made to section D.1 'Assets'- Other assets). However, due to the differences in valuation of assets



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and liabilities as set out in sections D.1 'Assets', D.2 'Technical provisions' and D.3 'Other liabilities' EUR -18,126 thousand lower deferred tax liabilities are recognised in the Solvency II balance sheet as at 31 December 2016.

In the IFRS balance sheet, other liabilities are reported at the notional amount. In the Solvency II balance sheet, other liabilities (with the exclusion of deferred taxes) are reported at market value. There are no significant valuation differences between IFRS and Solvency II for other liabilities as the market value is not significantly different from the notional value.

Presentation differences include the different presentation of accrued interest. Solvency II requires accrued interest to be presented as part of the interest bearing liability ('dirty market value') and not separately as other liabilities as in the 2016 Annual accounts of NN Schade ('clean market value'). Presentation differences amounted to EUR 113 thousand as at 31 December 2016.

Contingent liabilities and provisions

Part of the other liabilities are the contingent liabilities and provisions. In the IFRS balance sheet, provisions are recognised when:

- An entity has a present obligation (legal or constructive) as a result of a past event
- It is probable that an outflow of resources embodying economic benefits will be required to settle the obligation
- A reliable estimate can be made of the amount of the obligation

In the IFRS balance sheet, provisions are recognised for the amount representing the best estimate of the expenditure required to settle the present obligation at the end of the reporting period. Contingent liabilities are not recognised in the IFRS balance sheet. These are disclosed, unless the possibility of an outflow of resources embodying economic benefits is remote.

In the Solvency II balance sheet, all material contingent liabilities are recognised as liabilities for the expected present value of future cash flows required to settle the contingent liability over the lifetime of that contingent liability, using the basic risk-free interest rate term structure.

Valuation differences between IFRS and Solvency II for contingent liabilities and provisions represent:

- A recognition difference: contingent liabilities are not recognised in the IFRS balance sheet, but are recognised in the Solvency II balance sheet if the exposure can be reliably estimated
- A measurement difference: provisions are measured in the IFRS balance sheet using the best estimate outcome (i.e. the full amount that may be incurred), while Solvency II requires a provision for the probability weighted outcome (i.e. the probability multiplied by the impact of the differences as at 31 December 2016).

For more details on other provisions and contingent liabilities, reference is made to Note 31 'Contingent liabilities and commitments' in the 2016 Annual accounts of NN Schade.

Leasing

Information on operating lease arrangements are recognised in Note 22 'Other operating expenses' and Note 31 'Contingent liabilities and commitments' in the 2016 Annual accounts of NN Schade. There are no financial lease arrangements within NN Schade.

Expected profits in future premiums

For existing business, expected profits included in future premiums are reflected in the technical provisions and therefore contribute to the Own Funds. For more information on the expected profits in future premiums, reference is made to QRT S.23.01.21 'Own funds' as included in the Appendix.

Outflow of economic benefits

For the expected timing of the outflows of economic benefits reference is made to Note 36 'Risk management', section 'Liabilities' annual undiscounted cash flows' in the 2016 Annual accounts of NN Schade. Uncertainties surrounding the amount or timing of the outflows of economic benefits is described in the Liquidity Risk paragraph in Note 36 'Risk management' in the 2016 Annual accounts of NN Schade. The uncertainties in amount or timing of other liability cash flows are low. Deviation risk was not taken into account in the valuation of the other liabilities.

Changes during 2016

No significant changes were made to the recognition and valuation bases nor on estimations of the other liabilities during the reporting period.

D.4 Alternative methods for valuation

Alternative valuation methods used

Alternative valuation methods are used by NN Schade to determine the fair value of assets and liabilities if quoted market prices in active markets are unavailable. Reference is made to Note 25 'Fair value of financial assets and liabilities' in the 2016 Annual accounts of NN Schade for more information on the valuation approaches used.

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D.5 Any other information

Active markets

Information on the criteria used to assess whether markets are active is included in Note 1 'Accounting policies' in the 2016 Annual accounts of NN Schade. The valuation methods used if the markets are inactive are described in Note 25 'Fair value of financial assets and liabilities'.

Estimation uncertainties

For the major sources of estimation uncertainty, reference is made to the Own funds at risk in Note 36 'Risk Management' in the 2016 Annual accounts of NN Schade.

Other information

No other material information regarding the valuation of assets and liabilities for Solvency II purposes is relevant

E. Capital Management

Introduction

This chapter of the SFCR contains information on the capital management of NN Schade, including the reconciliation of IFRS equity to Solvency II Own Funds, NN Schade's Minimum Capital Requirement ('MCR') and detailed information on NN Schade's Partial Internal model.

E.1 Own funds

Reference is made to Note 37 'Capital management' in the 2016 Annual accounts of NN Schade for:

- The objectives, policies and processes employed by NN Schade for managing its own funds, including information on the time horizon used for business planning and on any material changes over the reporting period
- The structure, amount and quality of own funds, including the extent to which each material own fund item is available and subordinated, as well as its duration and any other features that are relevant for assessing its quality
- The amount of eligible own funds to cover the SCR and MCR, classified by tiers

Solvency II Basic Own Funds represents the excess of assets over liabilities in the Solvency II balance sheet. It comprises the following items:

- Paid-in ordinary share capital and the related share premium account
- A reconciliation reserve. The purpose of the reconciliation reserve is to reconcile the value of the above item to the total amount of the excess of assets over liabilities

NN Schade did not have ancillary own funds during 2016 or as at 31 December 2016.

Impact of transitional measures

The quantification of the impact of a change to zero of the volatility adjustment and transitional interest rates on NN Schade's financial position, represented by an adjustment on the amount of technical provisions, the SCR, the basic own funds and the eligible own funds is included in Section D.2 and QRT S.22.01.21 'Impact of long term guarantees and transitional measures' in the Appendix.

Items deducted from own funds

Under Solvency II, Own funds are reduced by 'foreseeable dividends, distributions and charges'. This requirement is different from reporting under IFRS where dividends are deducted from equity (and a corresponding liability is recognised) when they are declared.

Under IFRS and Solvency II, dividends are deducted from equity when these are declared. Dividends are declared when these are approved by the General meeting.

In addition, under Solvency II, proposed dividends that are not yet finally approved but form part of the appropriation of the net result for the year are foreseeable dividends as from the date the decision to distribute has been made by the Management Board. If such decision is made after the balance sheet date but before the publication date, these are reflected as foreseeable dividends. Dividends that are approved after the balance sheet date and relate to the new period/year (i.e. are not part of the appropriation of the result for the period), are not reflected as foreseeable dividends at the reporting date.

Quantitative explanation of the material differences between IFRS equity and excess assets over liabilities as calculated for solvency purposes is provided further in this section and section D 'Valuation for Solvency Purposes'.

Additional ratios

No additional ratios are disclosed in the Solvency and Financial Condition Report other than the ratios included in QRT S.23.01.21 'Own funds' as included in the Appendix.

Analysis of significant changes in own funds

Reference is made to Note 37 'Capital management' of the 2016 Annual accounts of NN Schade for an analysis of significant changes in own funds.

The principal loss-absorbency mechanism

During 2016, NN Schade had no principal loss-absorbency mechanism in place.

Reconciliation reserve

The reconciliation reserve equals the total excess of assets over liabilities reduced by the following key elements:

- Paid-in ordinary share capital and related share premium account
- Foreseeable dividends, distributions and charges

The reconciliation reserve is included in QRT S.23.01.21 'Own funds' in the Appendix to this report.

As at 31 December 2016 NN Schade does not have any deductions for foreseeable dividends, distributions and charges.

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Reconciliation IFRS equity to Own Funds

Reconciliation IFRS equity to Solvency II Basic Own Funds

As at 31 December 2016.	2016
IFRS Shareholders' Equity	539,146
Elimination of deferred acquisition costs and other intangible assets	-38,644
Valuation differences on assets	37,144
Valuation differences on liabilities, including insurance and investment contracts	-70,915
Deferred tax effects on valuation differences	18,126
Excess assets/ liabilities	484,857
Foreseeable dividends and distributions	
Basic Own Funds	484,857

The differences between IFRS Shareholders' Equity in NN Schade's 2016 Annual accounts and Solvency II Basic Own Funds of NN Schade as at 31 December 2016 are mainly caused by:

Valuation differences:

- Intangible assets are not recognised under Solvency II
- · Deferred acquisition costs are not recognised under Solvency II as separate balance sheet item
- Loans and advances are measured differently on the IFRS and Solvency II balance sheets
- · Reinsurance contracts are measured differently
- · Insurance and investment contract liabilities are measured differently
- The other adjustments mainly consist of the change in net Deferred Tax Assets or Deferred Tax Liabilities caused by using different valuations for some Solvency II balance sheet items whilst the tax base of these items remained the same

Reference is made to section D 'Valuation for Solvency Purposes' for more information on the valuation and consolidation differences between IFRS and Solvency II.

Eligibility, transferability and fungibility of Own Funds

NN Schade does not have restrictions affecting eligibility, transferability and fungibility of Own Funds.

E.2 Solvency Capital Requirement and Minimum Capital Requirement

SCR

Reference is made to QRT S.25.02.21 in the Appendix and Note 36 'Risk management' in the 2016 Annual accounts of NN Schade for the amount of the SCR split by risk categories.

NN Schade determined the SCR including:

 Loss-absorbing capacity of deferred taxes ('LAC DT'). NN Schade's total loss in a 1-in-200 adverse event would be offset by tax recoveries and these are recognised to the extent to be expected to be recoverable. The determination of LACDT is significantly dependent on various assumptions, such as capitalisation assumptions, the assumed investment returns and the projection period.

Deferred tax under Solvency II

The total deferred tax amount in Solvency II arises from:

- Taxable or deductible temporary differences because the carrying amount of assets or liabilities in the Solvency II balance sheet differs from the tax base of those assets or liabilities. These differences multiplied by the tax rate are recognised as a net deferred tax liability or a net deferred tax asset (per legal entity) in the balance sheet. Reference is made to section D.1 'Assets' for the deferred tax asset recognised in the Solvency II balance sheet.
- The LAC DT on the SCR.
- Unused tax losses that are available for carry forward for tax purposes.

Not all valuation differences between the tax basis and Solvency II and SCR shocks will lead to deferred tax as certain elements are exempt for tax. For example: valuation differences on equity securities and the equity shock in the SCR would normally not result in a deferred tax effect when equity returns are exempt from tax. Therefore, these are excluded from the valuation differences and SCR amounts in order to arrive at the deferred tax balances for Solvency II.

The total deferred tax amount for Solvency II is therefore built up in a number of steps:

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- deferred tax assets on unused tax losses
- +/- deferred tax assets/liabilities from valuation differences between IFRS and tax basis (except for non-taxable items)
- = deferred tax asset/liability in the IFRS balance sheet (deferred tax for IFRS)
- +/- deferred tax assets/liabilities from valuation differences between Solvency II and IFRS (except for non-taxable items)
- = deferred tax asset/liability in the Solvency II balance sheet (deferred tax for Own Funds)
- + deferred tax on SCR (LAC DT on the SCR) (except for non-taxable items)
- = total deferred tax amount for Solvency II

The 'total deferred tax amount for Solvency II' represents the deferred tax position that would be reflected in a Solvency II balance sheet that is fully shocked in line with the SCR shock. Any net deferred tax asset/benefit - whether for IFRS, Own Funds or SCR - must be tested for recoverability. The general guidance on assessing recoverability is summarised as follows:

Tax assets can only be recognised when it is concluded that their recoverability is probable. This applies to both deferred tax assets from timing differences, deferred tax assets from unused tax losses carried forward and the LAC DT on the SCR.

Deferred tax assets are recoverable when:

- There are sufficient deferred tax liabilities relating to the same taxation authority and the same taxable entity. These deferred tax liabilities must be expected to reverse either in the same period as the tax asset or in periods into which a tax loss can be carried back or forward
- It is probable that the entity will have sufficient taxable profit relating to the same taxation authority and the same taxable entity in the same period as the reversal of the deductible temporary difference (or in the periods into which a tax loss arising from the deferred tax asset can be carried back or forward)
- Tax planning opportunities are available

Deferred taxes in the IFRS and Solvency II balance sheet are nominal, undiscounted, amounts. Therefore, recoverability testing also only considers nominal, undiscounted, amounts.

Specific guidance applies under Solvency II in respect of item b. 'Sufficient taxable profit' as, different from IFRS, this refers to Solvency II based profits (before and after a shock event) and not to regular (IFRS-based) profits.

In order to assess the recoverability of deferred tax, the total deferred tax amount for Solvency II (i.e. deferred tax in the Solvency II balance sheet plus the LAC DT on the SCR) must be equal to or lower than the total recoverable deferred tax amount in a Solvency II environment.

The recoverable amount must be assessed at the legal entity level and may not - except for the Solvency II balance sheet deferred tax asset only - include amounts from other entities in the Group, independent of existing fiscal unities or tax groups. While from a legal, tax and economic perspective the recoverability would benefit from the existence of a fiscal unity, and therefore the benefit from a fiscal unity is 'real', the guidance as published by DNB prohibits reflecting the benefit of a fiscal unity in supporting the LAC DT on the SCR. The fiscal unity may be reflected in supporting the deferred tax asset in the Solvency II balance sheet.

As the total deferred tax amount for Solvency II (i.e. the deferred tax asset that exists in a fully shocked SCR balance sheet) is the highest amount, it acts as starting point for the recoverability test. This total amount reflects the differences between the tax values and the Solvency II values for all assets and liabilities and the tax benefit on the SCR. Only if the total deferred tax is non-recoverable, the recoverability of the deferred tax in Own Funds becomes separately relevant.

NN Group holds the capital buffers for the Group companies. Therefore NN Schade is dependent on recapitalisation from NN Group to continue as a going concern after a shock. The tax recoverability test of NN Schade is performed on this basis.

The total recoverable deferred tax amount in a Solvency II environment may come from various sources and includes both recoverability from items that never impact taxable profits and reverse over time as well as sources of profits and losses that would emerge in a Solvency II environment or a Solvency II environment after a SCR-type shock would have occurred. The recoverability is therefore based on an estimation of the total taxable results (including both income and expenses) that is expected to arise in a Solvency II environment after the shock. The sources of recoverability include all components of the estimated future taxable results, irrespective whether these are income ('profit') or expense ('loss').

The following items are included in determining the total recoverable deferred tax amount:

- Reversal of the amount of the risk margin in the technical provision
- Reversal of other valuation differences
- Taxable return on capital directly after the shock for one year
- Taxable return on capital after recovery to 100% SCR within one year for a certain period
- · Investment return on assets backing insurance liabilities in excess of interest on technical provisions

NN Schade has sufficient recoverable amounts to support the total deferred tax position recognised.

Capital management

Continued

The net deferred tax asset is classified as Tier 3 capital. Tier 3 capital cannot exceed 15% of NN Schade's SCR. Futher information on Tiering is included in Note 37 'Capital management' in the 2016 Annual accounts of NN Schade.

MCR

For the MCR (and its inputs) as calculated in accordance with the formulas in the Solvency II regulations, reference is made to QRT S.28.01.01 as included in the Appendix.

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

NN Schade has not used the duration-based equity risk sub-module during the reporting period.

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

Internal Model vs Standard Formula

NN Schade applies a Partial Internal Model as it better reflects the risk profile of the entity and contains additional benefits for risk management purposes, whilst the Standard Formula adequately captures the risk profile of the international businesses.

In particular:

- An Internal Model approach better reflects the specific assets and therefore the market risk in the portfolio of NN Schade e.g. property risk, sovereign and other credit spread risks. In addition the approach to the most significant non-market risks within NN Schade such as Disability/Morbidity and catastrophe windstorm is better tailored to the specific portfolio characteristics and statutory reserves set up according to local company law
- In the case of Disability/Morbidity Risks the product features and experience in the Dutch market are different from those in the wider European market, e.g. greater emphasis is placed on claimants returning to work in the Netherlands
- In the case of the non-life catastrophe windstorm risk in P&C products the Internal Model better reflects the risk profile in the NN portfolio which differs due to the type of property
- The Standard Formula diversification assumptions do not recognise all the diversification of risks that exists in the NN portfolios.

Risks covered by the internal model which are not -or differently- covered in the standard formula

Risk arises from the possibility that actual experience will negatively deviate from expectations, which results in economic losses for NN Schade. In this respect, NN Schade identified the following risk factors, and developed probability distributions for these various risk factors, as part of its Internal Model, which leads to the Basic Solvency Capital requirement ('BSCR'):

Capital management

Continued



In addition to the risks covered in the Standard Formula, the Internal Model includes the following risks:

- Inflation risk is defined as the risk associated with adverse changes in both realised and future expected inflation rates
- Equity implied volatility refers to the possibility of adverse changes in Solvency II own funds due to adverse changes in the level of equity implied volatilities
- Interest rate implied volatility refers to the possibility of adverse changes in Solvency II own funds due to adverse changes in the level of interest rate implied volatilities
- Foreign Exchange implied volatility refers to the possibility of adverse changes in Solvency II own funds due to adverse changes in the level of foreign currency implied volatilities
- Basis risk is the risk that occurs if the underlying asset or liability behaves differently than the underlying hedge instrument
- Continuation risk refers to political, country or legal risk

Continued

Business and performance System of governance Risk profile Valuation for Solvency purposes Capital management

The most important differences between the Internal Model and the Standard Formula in covered risk factors are:

- Interest Rate Risk:
 - The Internal Model incorporates several shocks, including non-parallel ones, to the curve instead of only two parallel shocks used in the Standard Formula
 - When interest rates are at low levels, the Internal Model uses absolute shocks, while the Standard Formula uses relative shocks
- In the Internal Model, first, the shock is applied to the interest rates and then the resulting rates are extrapolated to the Ultimate Forward rate. In the Standard Model the interest rates are first extrapolated to the Ultimate Forward rate and afterwards the shock is applied.
- Equity Risk:
- Level of shocks differs mainly because it is calibrated to the equity portfolio of NN Group
- Credit Spread:
 - Shocks in the Internal Model apply to all fixed income assets, whereas the Standard Formula does not apply shocks to the bonds issued by countries which are EU members
- Real Estate Risk:
- Shock applied in the Standard Formula is calibrated to historical prices observed in the UK property market, while the shock in the Internal Model is calibrated to actual exposures of NN Group
- Counterparty Default Risk:
 - Counterparty Default Risk module in the Standard Formula includes shocks applied to mortgage exposure, which are included under the Credit Spread module in the Internal Model
- Diversification within the Market Risk module:
 - The Internal Model assumes significant diversification between interest rate risk, on the one hand and Credit Spread and Equity risks, on the other. Under the Standard Formula, diversification between these risks is different.
- Morbidity risk:
 - For some products (e.g. WGA-EBD) the benefits are very specific to the Dutch market and depend on Dutch legislation. The regular Standard Formula calibration is based on Europe wide experience and does not fit the Dutch market well. Furthermore, the Standard Formula calculation does not take all risks into account that are present in the WIA products.
- Non-life Catastrophe risk:
 - NN Schade's own data does not fit the Standard Formula assumptions. For CAT Windstorm, the specific characteristics of the NN portfolio (e.g. building characteristics – private or commercial) and a more advanced model that predicts the path of storm have been used to more accurately capture the risk profile of the business than is possible with the Standard Formula. For CAT man made liability, the Standard Formula applies a factor to the premium received for each type of risk. A more sophisticated simulation approach to model different catastrophes and claims based on a historic data analysis shows that the Standard Formula does not fully reflect the risk profile of our business.

Capital requirements for operational risk is calculated based on the Standard Formula, and added to the combined BSCR.

Next, loss absorption capacity of taxes are included.

Further reference is made to the QRT 25.02.21 in the Appendix.

The nature and appropriateness of the data used in the internal model

Market data is collected from pre-defined external data sources. The market data methodologies are based on the following key principles:

- All relevant market data must be used when it is available and is of sufficient quality, i.e. data derived from deep, liquid and transparent ('DLT') markets; for most of the market risk models NN Schade uses standard well established market data sources,
- The market data used should be of sufficient quality; e.g. for most of the market risk models standard well established market data sources are used. The data is analysed for correctness as part of the calibration process;
- · From the last observable liquid market data point, extrapolation methods must be used to complete the data set
- Extrapolated market data should
 - Be free of arbitrage
 - Be based on sound theoretical assumptions and/or expert judgment
 - Follow a smooth path from the entry point to the unconditional long-term level
- Estimates of ultimate long-term rates or levels should be stable over time, and only change because of changes in long-term expectations
- For non-market risks in general, an appropriate selection of company-specific data is made to give the best possible fit to our risk profile

Capital management

Continued

Qualitative and quantitative information on the material sources of NN Schade's diversification effects

The material group diversification effects arises from:

- Diversification within market risk module of EUR 49 million as at 31 December 2016 including diversification effects between interest rate risk, on the one hand, and credit spread and equity risk, on the other
- Diversification between market risk and non-market risk of EUR 150 million as at 31 December 2016

The uses of the Internal model

The Internal Model allows NN Schade to treat different risk management activities in a consistent way:

- The model provides a framework which is consistent across risk types, businesses and the key uses such as market valuation, capitalisation, product pricing, investments, monitoring of risk appetite and risk mitigation/transfer
- The model facilitates adequate risk management at all levels of the organisation and provides a framework to measure, monitor and manage risks versus NN Schade's risk appetite
- The model allows NN Schade to manage risk in many different ways, e.g.:
- Manage individual risk types at a much more granular approach, i.e. a stochastic (loss distribution) approach
- Manage volatility in a stochastic rather than deterministic approach
- Supports valuation, scenario- and stress analysis by running scenarios in a simple way using replicating portfolios
- The model allows NN Schade to proactively define its risk measurement and management approach rather than awaiting (generic) industry changes to the Standard Formula

The Internal Model is used for different purposes. It is used to measure and manage the risks at all levels within the company, thus covering the entire loss distribution. This information is not only used to determine the SCR to cover tail risks. It is also used for, amongst others, wider risk management, capital management and business decisions such as product pricing and asset allocation. The following diagram provides an overview of the key uses of the Internal Model.



The methods used in the internal model for the calculation of the probability distribution forecast and the Solvency Capital Requirement For the market risk models the Normal Inverse Gaussian ('NIG') distribution is mostly used. The class of the NIG distributions is a flexible set of distributions that includes fat-tailed and skewed distributions. For some market risk models e.g. for the real estate risk model where fewer data points are available, the Normal or t-distribution are used.

Where there is lack of annual data, higher frequency data is used for the calibration of the distribution parameters. The distribution is then annualised for the calculation of the SCR.

To assess the quality of the calibration, the goodness-of-fit tests and back testing are applied.

Continued

Reference is made to Note 37 'Capital management' in the 2016 Annual accounts of NN Schade for more information on the risk measure and time period used in the Internal Model.

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

NN Schade complied with the MCR and the SCR during the reporting period.

E.6 Any other information

Reference is made to Note 37 'Capital management' in the 2016 Annual accounts of NN Schade for any other material information regarding the capital management of NN Schade.

Appendix 1: Quantitative Reporting Templates of the

Solvency and Financial Condition Report Amounts in thousands of euros

Appendix 1: Quantitative Reporting Templates that form part of the Solvency and Financial Condition Report

This appendix includes certain Quantitative Reporting Templates ('QRTs') of NN Group, required to be reported to DNB and to be publicly disclosed:

Reference number	Titl	e Description
		Balance sheet information using Solvency II valuation
S.02.01.02	Balance sheet	methodology
		Information on premiums, claims and expenses using
		the valuation and recognition principles used in NN
S.05.01.02	Premiums, claims and expenses by line of business	Group's Consolidated annual report
		Information on premiums, claims and expenses by
		country using the valuation and recognition principles
S.05.02.01	Premiums, claims and expenses by country	used NN Group's Consolidated annual report
		Information on Life and Health similar to life technical
S.12.01.02	Life and Health SLT Technical Provisions	provisions by line of business
		Information on Non-life enad Health similar to Non-
S.17.01.02	Non-Life Technical Provisions	life technical provisions by line of business
		Information on Non-life Gross Claims paid and Best
S.19.01.21	Non-Life insurance claims	Estimate provision
	Impact of long term guarantees and transitional	Information on the impact of the long term guarantee
S.22.01.21	measures	and transitional measures
S.23.01.01	Own funds	Information on own funds, including basic own funds
		Information on the Solvency Capital Requirement
		calculated using the standard formula and a partial
S.25.02.21	Solvency Capital Requirement	internal model
	Minimum Capital Requirement – Only life or only non	- Information on the Minimal Capital Requirement
S.28.01.01	life insurance or reinsurance activity	calculation.

All amounts in this appendix are recorded in EUR thousand.

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S.02.01.02 Balance sheet

S.02.01.02 Buildince Sheet		Solvency II value
	-	C0010
Assets		
Goodwill	R0010	
Deferred acquisition costs	R0020	
Intangible assets	R0030	
Deferred tax assets	R0040	
Pension benefit surplus	R0050	
Property, plant & equipment held for own use	R0060	
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	2,264,572
Property (other than for own use)	R0080	
Holdings in related undertakings, including participations	R0090	10,327
Equities	R0100	73,207
Equities - listed	R0110	56,587
Equities - unlisted	R0120	16,621
Bonds	R0130	1,762,318
Government Bonds	R0140	1,398,498
Corporate Bonds	R0150	347,307
Structured notes	R0160	,
Collateralised securities	R0170	16.513
Collective Investments Undertakings	R0180	418,719
Derivatives	R0190	110,110
Deposits other than cash equivalents	R0200	
Other investments	R0210	
Assets held for index-linked and unit-linked contracts	R0220	
Loans and mortgages	R0230	724,533
Loans on policies	R0240	721,000
Loans and mortgages to individuals	R0250	513,838
Other loans and mortgages	R0200	210.695
Reinsurance recoverables from:	R0270	37.067
Non-life and health similar to non-life	R0280	11,942
Non-life excluding health	R0200	12,075
Health similar to non-life	R0290	-133
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	25,125
Health similar to life	R0310	25,125
Life excluding health and index-linked and unit-linked	R0320	20,120
5	R0330 R0340	
Life index-linked and unit-linked		0.007
Deposits to cedants	R0350	3,337
Insurance and intermediaries receivables	R0360	38,018
Reinsurance receivables	R0370	2,284
Receivables (trade, not insurance)	R0380	68,966
Own shares (held directly)	R0390	
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	
Cash and cash equivalents	R0410	4,342
Any other assets, not elsewhere shown	R0420	6,092
Total assets	R0500	3,149,211

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		Solvency II value
	-	C0010
Liabilities	Docto	000070
Technical provisions – non-life	R0510	896,379
Technical provisions – non-life (excluding health)	R0520	729,759
Technical provisions calculated as a whole	R0530	
Best Estimate	R0540	694,195
Risk margin	R0550	35,564
Technical provisions - health (similar to non-life)	R0560	166,620
Technical provisions calculated as a whole	R0570	
Best Estimate	R0580	156,948
Risk margin	R0590	9,672
Technical provisions - life (excluding index-linked and unit-linked)	R0600	1,617,531
Technical provisions - health (similar to life)	R0610	1,617,531
Technical provisions calculated as a whole	R0620	
Best Estimate	R0630	1,552,683
Risk margin	R0640	64,849
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	
Technical provisions calculated as a whole	R0700	
Best Estimate	R0710	
Risk margin	R0720	
Other technical provisions	R0730	
Contingent liabilities	R0740	
Provisions other than technical provisions	R0750	8.105
Pension benefit obligations	R0760	0,100
Deposits from reinsurers	R0770	
Deferred tax liabilities	R0780	39.361
Derivatives	R0790	9
Debts owed to credit institutions	R0800	54,387
Financial liabilities other than debts owed to credit institutions	R0810	51,507
Insurance & intermediaries payables	R0820	16.018
Reinsurance payables	R0830	1,803
Payables (trade, not insurance)	R0840	27.562
Subordinated liabilities	R0840	21,302
Subordinated liabilities	R0860	
Subordinated liabilities in Basic Own Funds	R0870	
	R0870	3.199
Any other liabilities, not elsewhere shown Total liabilities	R0880	-,
		2,664,354
Excess of assets over liabilities	R1000	484,857

Appendix 1: Quantitative Reporting Templates of the Solvency and Financial Condition Report Continued

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

,		•	-	n-life insuran	ce and reins	urance oblig		t business an roportional re		Total
		Income protection insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Legal expenses insurance	Miscellane ous financial loss	1000
		C0020	C0040	C0050	C0060	C0070	C0080	C0100	C0120	C0200
Premiums written	Datta	007.000	100 500	101 5 10	17.550	0.47.740	100.007		0.470	1007.150
Gross - Direct Business	R0110	267,090	128,506	101,542	17,556	347,712	123,207	39,664	2,176	1,027,452
Gross - Proportional reinsurance	D0100	2	20		1	007	1000			2.400
accepted	R0120	2	26		1	997	1,380			2,406
Gross - Non-proportional reinsurance	D0120									
accepted	R0130	1100	401	01	070	11 077	1 4 - 1			14.000
Reinsurers' share	R0140 R0200	1,198 265,893	421	91 101,450	270 17,286	11,377 337,332	1,451	39,664	2,176	14,809
	R0200	265,893	128,112	101,450	17,200	337,332	123,130	39,664	2,176	1,015,049
Premiums earned	Dooto	005 007	100.000	100.000	10111	0.40.405	100 770	00 501	0.007	1 0 0 0 1 0 0
Gross - Direct Business	R0210	265,807	129,068	102,388	18,144	348,495	123,770	39,521	2,237	1,029,429
Gross - Proportional reinsurance	Doooo	2	01		1	1000	1000			0.400
accepted	R0220	2	31		1	1,029	1,360			2,422
Gross - Non-proportional reinsurance	DODDO									
accepted	R0230	1100	401	01	070	11.070	1 40 0			14.0.40
Reinsurers' share	R0240	1,198	421	91	270	11,378	1,482	20 5 21	0.007	14,842
Net	R0300	264,610	128,678	102,297	17,875	338,145	123,647	39,521	2,237	1,017,010
Claims incurred	D0010	100.050	100.075	00.000	0.000	100 700	01 5 0 0	00.440	10.4	050.054
Gross - Direct Business	R0310	166,852	122,075	66,602	9,289	189,703	81,533	23,412	184	659,651
Gross - Proportional reinsurance	Doooo		10		0	070	700			1005
accepted	R0320		-12		2	376	730			1,095
Gross - Non-proportional reinsurance	DODDO									
accepted	R0330	207	710				2 200			4100
Reinsurers' share	R0340	207	718	CC CO 2	0.001	100.070	3,208	00.410	10.4	4,133
Net	R0400	166,645	121,345	66,602	9,291	190,079	79,054	23,412	184	656,613
Changes in other technical provisions										
Gross - Direct Business	R0410									
Gross - Proportional reinsurance										
accepted	R0420									
Gross - Non- proportional reinsurance										
accepted	R0430									
Reinsurers'share	R0440									
Net	R0500									
Expenses incurred	R0550	88,923	64,505	38,069	7,727	153,657	66,123	12,777	748	432,529
Other expenses	R1200									
Total expenses	R1300									

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		Line of Business for: life insurance obligations Health insurance	Total
Duranti una unittan		C0210	C0300
Premiums written Gross	R1410	261,782	261,782
Reinsurers' share	R1420	4,161	4,161
Net	R1500	257,621	257,621
Premiums earned			
Gross	R1510	272,260	272,260
Reinsurers' share	R1520	4,161	4,161
Net	R1600	268,099	268,099
Claims incurred			
Gross	R1610	196,804	196,804
Reinsurers' share	R1620	3,650	3,650
Net	R1700	193,154	193,154
Changes in other technical provisions			
Gross	R1710		
Reinsurers' share	R1720		
Net	R1800		
Expenses incurred	R1900	78,106	78,106
Other expenses	R2500		
Total expenses	R2600		78,106

S.05.02.01 Premiums, claims and expenses by country

		Home Country	Total Top 5 and home country
		C0010	C0070
	R0010		
		C0080	C0140
Premiums written			<u>.</u>
Gross - Direct Business	R0110	1,027,452	1,027,452
Gross - Proportional reinsurance accepted	R0120	2,406	2,406
Gross - Non-proportional reinsurance accepted	R0130		
Reinsurers' share	R0140	14,809	14,809
Net	R0200	1,015,049	1,015,049
Premiums earned			
Gross - Direct Business	R0210	1,029,429	1,029,429
Gross - Proportional reinsurance accepted	R0220	2,422	2,422
Gross - Non-proportional reinsurance accepted	R0230		
Reinsurers' share	R0240	14,842	14,842
Net	R0300	1,017,010	1,017,010
Claims incurred			
Gross - Direct Business	R0310	659,651	659,651
Gross - Proportional reinsurance accepted	R0320	1,095	1,095
Gross - Non-proportional reinsurance accepted	R0330		
Reinsurers' share	R0340	4,133	4,133
Net	R0400	656,613	656,613
Changes in other technical provisions			
Gross - Direct Business	R0410		
Gross - Proportional reinsurance accepted	R0420		
Gross - Non- proportional reinsurance accepted	R0430		
Reinsurers'share	R0440		
Net	R0500		
Expenses incurred	R0550	432,529	432,529
Other expenses	R1200		
Total expenses	R1300	432,529	432,529

		Home Country	Total Top 5 and home country
		C0150	C0210
	R1400		
		C0220	C0280
Premiums written			
Gross	R1410	261,782	261,782
Reinsurers' share	R1420	4,161	4,161
Net	R1500	257,621	257,621
Premiums earned			
Gross	R1510	272,260	272,260
Reinsurers' share	R1520	4,161	4,161
Net	R1600	268,099	268,099
Claims incurred			
Gross	R1610	196,804	196,804
Reinsurers' share	R1620	3,650	3,650
Net	R1700	193,154	193,154
Changes in other technical provisions			
Gross	R1710		
Reinsurers' share	R1720		
Net	R1800		
Expenses incurred	R1900	78,106	78,106
Other expenses	R2500		·
Total expenses	R2600		78,106

Appendix 1: Quantitative Reporting Templates of the Solvency and Financial Condition Report Continued

S.12.01.02 Life and Health SLT Technical Provisions

		Health insur		
		wit	Total (Health similar to life insurance)	
		C0160	C0170	C0210
Technical provisions calculated as a whole	R0010			
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected				
losses due to counterparty default associated to TP as a whole	R0020			
Technical provisions calculated as a sum of BE and RM				
Best Estimate				
Gross Best Estimate	R0030		1,552,683	1,552,683
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected				
losses due to counterparty default	R0080		25,125	25,125
Best estimate minus recoverables from reinsurance/SPV and Finite Re - total	R0090		1,527,558	1,527,558
Risk Margin	R0100	64,849		64,849
Amount of the transitional on Technical Provisions				
Technical Provisions calculated as a whole	R0110			
Best estimate	R0120			
Risk margin	R0130			
Technical provisions - total	R0200	1,617,531		1,617,531

S.17.01.02 Non-life Technical Provisions

		Direct business and accepted proportional reinsurance									
		Income protection insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Legal expenses insurance	Miscellane ous financial loss	Total Non- Life obligation	
-		C0030	C0050	C0060	C0070	C0080	C0090	C0110	C0130	C0180	
Technical provisions calculated as a											
whole	R0010										
Total Recoverables from											
reinsurance/SPV and Finite Re after											
the adjustment for expected losses due											
to counterparty default associated to	DOOFO										
TP as a whole	R0050										
Technical provisions calculated as a sum of BE and RM											
Best estimate											
Premium provisions											
Gross	R0060	-9.177	24.936	10.446	-829	38.015	544	977	-523	64.389	
Total recoverable from		0,111	2 1,000	.5,110	020	00,010	011	0,1	020	01,000	
reinsurance/SPV and Finite Re after											
the adjustment for expected losses due											
to counterparty default	R0140	-133	-72	1	-89	-3,360	-612	0	0	-4.266	
Net Best Estimate of Premium				· · ·						.,	
Provisions	R0150	-9,043	25,007	10,445	-741	41,375	1,156	977	-523	68,655	
Claims provisions											
Gross	R0160	166,124	262,984	20,358	9,475	116,415	202,304	8,041	1,053	786,754	
Total recoverable from											
reinsurance/SPV and Finite Re after											
the adjustment for expected losses due											
to counterparty default	R0240	1	4,385	0	32	0	11,791	0	0	16,208	
Net Best Estimate of Claims Provisions	R0250	166,124	258,599	20,358	9,444	116,415	190,513	8,041	1,053	770,546	
Total Best estimate - gross	R0260	156,948	287,920	30,804	8,646	154,430	202,847	9,018	530	851,143	
Total Best estimate - net	R0270	157,081	283,606	30,803	8,703	157,790	191,669	9,018	530	839,201	
Risk margin	R0280	9,672	8,281	2,478	689	10,115	13,148	790	62	45,236	
Amount of the transitional on Technical											
Provisions											
Technical Provisions calculated as a											
whole	R0290										
Best estimate	R0300										
Risk margin	R0310										
Technical provisions - total	B										
Technical provisions - total	R0320	166,620	296,200	33,282	9,335	164,545	215,995	9,809	592	896,379	
Recoverable from reinsurance											
contract/SPV and Finite Re after the											
adjustment for expected losses due to	Dooco	100	4.010			0.000	44.470	-	0	11.0.10	
counterparty default - total	R0330	-133	4,313	1	-57	-3,360	11,178	0	0	11,942	
Technical provisions minus											
recoverables from reinsurance/SPV	D0340	160 750	201.007	22.201	0.202	167.005	204.017	0.000	500	004 407	
and Finite Re - total	R0340	166,753	291,887	33,281	9,393	167,905	204,817	9,809	592	884,437	

Appendix 1: Quantitative Reporting Templates of the Solvency and Financial Condition Report Continued

S.19.01.21 Non-Life insurance claims (Gross claims paid)

		Develop ment year										
		0	1	2	3	4	5	6	7	8	9	10 & +
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110
Prior	R0100											16,504
N-9	R0160	322,176	225,732	35,053	17,940	10,772	7,765	7,007	4,471	4,637	3,060	
N-8	R0170	308,489	170,871	39,202	17,006	12,773	10,358	8,651	8,171	7,858		
N-7	R0180	354,743	170,763	45,247	18,556	10,128	11,973	7,996	8,534			
N-6	R0190	357,387	188,057	45,586	15,084	11,577	9,130	7,344				
N-5	R0200	366,675	189,342	40,539	18,121	13,180	14,640					
N-4	R0210	331,706	176,249	40,961	20,176	14,691						
N-3	R0220	313,205	202,131	36,968	24,858							
N-2	R0230	311,801	177,078	45,364								
N-1	R0240	307,706	176,905									
Ν	R0250	321,760										

	In Current year	Sum of years (cumulative)
	C0170	C0180
R0100	16,504	16,504
R0160	3,060	638,613
R0170	7,858	583,379
R0180	8,534	627,940
R0190	7,344	634,164
R0200	14,640	642,497
R0210	14,691	583,784
R0220	24,858	577,161
R0230	45,364	534,242
R0240	176,905	484,610
R0250	321,760	321,760
R0260	641,517	5,644,654

Business and performance	
System of governance	
Risk profile	
Valuation for Solvency purposes	
Capital management	
	-

S.19.01.21 Non-Life insurance claims (Gross undiscounted best estimate claims provisions)

		Develop ment year										
		0	1	2	3	4	5	6	7	8	9	10 & +
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300
Prior	R0100											66,710
N-9	R0160										9,246	
N-8	R0170									17,060		
N-7	R0180								14,899			
N-6	R0190							24,682				
N-5	R0200						30,431					
N-4	R0210					41,054						
N-3	R0220				63,491							
N-2	R0230			94,365								
N-1	R0240		130,815									
N	R0250	303,956										

	Year end (discounted data)
-	· · · ·
	C0360
R0100	65,410
R0160	9,029
R0170	16,729
R0180	14,619
R0190	24,318
R0200	29,866
R0210	40,315
R0220	62,336
R0230	92,979
R0240	129,317
R0250	301,835
Total R0260	786,754

System of governance

Appendix 1: Quantitative Reporting Templates of the Solvency and Financial Condition Report Continued Risk profile Valuation for Solvency purposes

Capital managemen

S.22.01.21 Impact of long term guarantees and transitional measures

,, , , ,	Amount with LTG measures and transitionals	Impact of transitional on technical provisions	Impact of transitional on interest rate	Impact of volatility adjustment set to zero 1)	Impact of matching adjustment set to zero
	C0010	C0030	C0050	C0070	C0090
Technical provisions R0010	2,513,910			20,485	
Basic own funds R0020	484,857			-15,447	
Eligible own funds to meet SCR R0050	484,857			-15,447	
SCR R0090	380,692			86,765	
Eligible own funds to meet MCR R0100	484,857			-15,447	
Minimum Capital Requirement R0110	171,311			34,056	

1 This reflects the impact to set the volatility adjustment to zero; it does not reflect second order impacts, such as changes to LAC DT (which is kept constant).

Reference is made to Section D.2 for more information on the impact of long term guarantees and transitional measures.



Appendix 1: Quantitative Reporting Templates of the Solvency and Financial Condition Report Continued

S.23.01.01 Own funds

S.23.01.01 Own funds			Tioud	Time		
		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other						
financial sector as foreseen in article 68 of Delegated						
Regulation 2015/35						
Ordinary share capital (gross of own shares)	R0010	6,807	6,807			
Share premium account related to ordinary share capital	R0030	3,699	3,699			
linitial funds, members' contributions or the equivalent						
basic own - fund item for mutual and mutual-type						
undertakings	R0040					
Subordinated mutual member accounts	R0050					
Surplus funds	R0070					
Preference shares	R0090					
Share premium account related to preference shares	R0110					
Reconciliation reserve	R0130	474,352	474,352			
Subordinated liabilities	R0140					
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					
Own funds from the financial statements that should not be						
represented by the reconciliation reserve and do not meet the						
criteria to be classified as Solvency II own funds						
Own funds from the financial statements that should not						
be represented by the reconciliation reserve and do not						
meet the criteria to be classified as Solvency II own funds	R0220					
Deductions						
Deductions for participations in financial and credit						
institutions	R0230					
Total basic own funds after deductions	R0290	484,857	484,857			
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on						
demand	R0300					
Unpaid and uncalled initial funds, members' contributions						
or the equivalent basic own fund item for mutual and						
mutual - type undertakings, callable on demand	R0310					
Unpaid and uncalled preference shares callable on						
demand	R0320					
A legally binding commitment to subscribe and pay for						
subordinated liabilities on demand	R0330					
Letters of credit and guarantees under Article 96(2) of the						
Directive 2009/138/EC	R0340					
Letters of credit and guarantees other than under Article						
96(2) of the Directive 2009/138/EC	R0350					
Supplementary members calls under first subparagraph of						
Article 96(3) of the Directive 2009/138/EC	R0360					
Supplementary members calls - other than under first						
subparagraph of Article 96(3) of the Directive						
2009/138/EC	R0370					
Other ancillary own funds	R0390					
Total ancillary own funds	R0400					
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	484,857	484,857			
Total available own funds to meet the MCR	R0510	484,857	484,857			
Total eligible own funds to meet the SCR	R0540	484,857	484,857			
Total eligible own funds to meet the MCR	R0550	484,857	484,857			
SCR	R0580	380,692	101,007			
MCR	R0600	171,311				
Ratio of Eligible own funds to SCR	R0620	1.27				
Ratio of Eligible own funds to MCR	R0640	2.83				
	110040	2.00				

C0060

		C0000
Reconciliation reserve		
Excess of assets over liabilities	R0700	484,857
Own shares (held directly and indirectly)	R0710	
Foreseeable dividends, distributions and charges	R0720	
Other basic own fund items	R0730	10,506
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	
Reconciliation reserve	R0760	474,352
Expected profits		
Expected profits included in future premiums (EPIFP) - Life business	R0770	
Expected profits included in future premiums (EPIFP) - Non- life business	R0780	55,439
Total Expected profits included in future premiums (EPIFP)	R0790	55,439

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	C0080	C0090
1001	Total capital requirement for market risk	158,665	158,665		
	Total capital requirement for counterparty				
1003	default risk	7,101	7,101		
1004	Overall Insurance Risk	387,920	387,920		
1005	Overall Business Risk	48,841	48,841		
1006	Operational risk	41,846	41,846		
	Loss absorbing capacity for deferred taxes				
9	if not modelled within components	-113,411	-113,411		

Calculation of Solvency Capital Requirement

Calculation of Solvency Capital Requirement	_	C0100
Total undiversified components RC	0110	530,962
Diversification R00)60	-150,270
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC R0	160	380,692
Solvency capital requirement excluding capital add-on R02	200	380,692
Capital add-ons already set R0	210	
Solvency capital requirement R02	220	380,692
Other information on SCR		
Amount/estimate of the overall loss-absorbing capacity of technical provisions R03	300	
Amount/estimate of the overall loss-absorbing capacity ot deferred taxes R0	310	-113,411
Capital requirement for duration-based equity risk sub-module R04	100	
Total amount of Notional Solvency Capital Requirements for remaining part R0	410	
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)) R04	120	
Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios R04	130	
Diversification effects due to RFF nSCR aggregation for article 304 R04	140	

S.28.01.01 Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity

			C0010
MCRnL Result	R	.0010	172,569
	reinsurar) best e and lated	Net (of reinsurance) written premiums in the last 12 months
Medical expense insurance and proportional reinsurance	R0020	0020	C0030
Income protection insurance and proportional reinsurance		7.081	265,893
Workers' compensation insurance and proportional reinsurance	R0040	,	200,000
Motor vehicle liability insurance and proportional reinsurance	R0050 283	3,606	128,112
Other motor insurance and proportional reinsurance		0,803	101,450
Marine, aviation and transport insurance and proportional reinsurance	R0070 8	8,703	17,286
Fire and other damage to property insurance and proportional reinsurance	R0080 15	7,790	337,332
General liability insurance and proportional reinsurance	R0090 19	1,669	123,136
Credit and suretyship insurance and proportional reinsurance	R0100		
Legal expenses insurance and proportional reinsurance	R0110	9,018	39,664
Assistance and proportional reinsurance	R0120		
Miscellaneous financial loss insurance and proportional reinsurance	R0130	530	2,176
Non-proportional health reinsurance	R0140		
Non-proportional casualty reinsurance	R0150		
Non-proportional marine, aviation and transport reinsurance	R0160		
Non-proportional property reinsurance	R0170		

		C0040
MCR∟ Result	R0200	32,079

		Net (of reinsurance/S PV) best estimate and TP calculated as a whole	Net (of reinsurance/S PV) total capital at risk
		C0050	C0060
Obligations with profit participation - guaranteed benefits	R0210		
Obligations with profit participation - future discretionary benefits	R0220		
Index-linked and unit-linked insurance obligations	R0230		
Other life (re)insurance and health (re)insurance obligations	R0240	1,527,558	
Total capital at risk for all life (re)insurance obligations	R0250		

	C0070
Linear MCR R0300	204,648
SCR R0310	380,692
MCR cop R0320	171,311
MCR floor R0330	95,173
Combined MCR R0340	171,311
Absolute floor of the MCR R0350	3,700
	C0070
Minimum Capital Requirement R0400	171,311

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