2017 Solvency and **Financial Condition** Report

Nationale-Nederlanden Schadeverzekering Maatschappij N.V.



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Content Solvency II

Solvency and Financial Condition Report

Summary	4
A. Business and Performance	6
B. System of Governance	9
C. Risk Profile	15
D. Valuation for Solvency Purposes	17
E. Capital Management	24
Appendix Quantitative Reporting Templates	34

Nationale-Nederlanden Schadeverzekering Maatschappij N.V. 2017 Solvency and Financial Condition Report

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 2017 Annual Report ('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 Delegated Regulation (EU) 2015/35/Annex XX 'Structure of the Solvency and Financial Condition Report and Regular Supervisory Report', this SFCR follows the required standard chapter layout. The subjects addressed are based on Directive 2009/138/EC/ and (amended) Directive 2014/51/EU section 3 – Public Disclosures (articles 51-56), Delegated Regulation (EU) 2015/35 and (amended) Delegated Regulation (EU) 2016/467 chapter XII Public Disclosures (articles 292-298). Furthermore, the figures presented in this report are in line with the supervisor's reported Quantitative Reporting Templates. NN Schade is required to submit the so-called Quantitative Reporting Templates ('QRTs') to its supervisor Dutch Central Bank ('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 2017, are included in the appendix to this SFCR.

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

The Solvency ratio, as well as the amounts disclosed in this SFCR are not final until filed with the regulators.

Chapter A 'Business and performance' describes the overall business profile and structure of NN Schade. It also provides insight into the underwriting and investment performance of NN Schade. Chapter B 'Governance system' explains the organisational governance structure and looks into the role and execution of key Solvency II functions. Chapter C 'Risk profile' analyses NN Schade's exposure to financial and non-financial risks and explains the risk mitigation techniques in place. Chapter D 'Valuation for solvency purposes' elaborates on the differences in presentation and measurement of balance sheet elements between Solvency II and International Financial Reporting Standards ('IFRS'). Chapter E 'Capital management' discusses the composition of available and Eligible Own Funds and the calculation of the Solvency Capital Requirement ('SCR').

Material changes in 2017

NN Schade is part of NN Group N.V. ('NN Group'). In 2017, NN Group acquired all issued and outstanding ordinary shares in the capital of Delta Lloyd N.V. ('Delta Lloyd'). The legal merger between NN Group Bidco B.V. (a 100% subsidiary of NN Group N.V.) and Delta Lloyd N.V. became effective on 1 June 2017. Following the acquisition, NN Group started to combine Delta Lloyd with the Dutch and Belgian activities of NN Group.

During 2017 new members of the Management Board of NN Schade were appointed and resigned due to the integration with Delta Lloyd. As per the date of integration the Management Board is responsible for both NN Schade and Delta Lloyd Schadeverzekering N.V. Further reference is made to the section 'Report of the Management Board – Business developments' in the 2017 Annual report of NN Schade.

Eligible Own Funds

Solvency II requires to hold Eligible Own Funds for covering Solvency Capital Requirement. The Eligible Own Funds are classified in three tiering categories. The tiering classification is prescribed in the Solvency II Legislation, as not all own-fund items are considered to be able to fully absorb losses in the event of winding-up proceedings. Tier 1 own-fund items are the highest grade capital and Tier 3 items are the lowest grade capital.

Eligible Own Funds

Tier 1 (unrestricted)	513,338	484,857
T o		
Tier 2		
Tier 3		
Total Eligible Own Funds	513,338	484,857

Eligible Own Funds increased EUR 28,481 thousand to EUR 513,338 thousand in 2017 mainly caused by the financial markets (equity, real estate and credit spread developments) and earned spreads. Two dividend payments totalling EUR 41,000 thousand and unfavourable Operating Experience variances (EUR-23,000 thousand) partly offset the increase in Own Funds.

Summary continued

Impact of long term guarantees and transitional measures

The quantification of the impact of a change to zero of the volatility adjustment, transitional on technical provisions and transitional on 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 paragraph 'Matching and volatility adjustment, transitional measures and transitional risk-free interest rate term structure' on page 21 in Section D.2 and QRT S.22.01.21 'Impact of long term guarantees and transitional measures' in the Appendix.

Solvency Capital Requirement

NN Schade uses the Partial Internal Model ('PIM') approved by DNB to measure SCR.

Solvency Capital Requirement

In EUR thousand	2017	2016
Market risk	165,193	158,665
Non-market risk	447,439	443,862
Diversification	-153,144	-150,270
Partial Internal Model BSCR	459,488	452,256
Operational Risk	42,864	41,846
Loss absorbing Capacity of Deferred Taxes	-116,263	-113,410
Total SCR	386,089	380,692

The SCR increased EUR 5,397 thousand to EUR 386,089 thousand in 2017. This is mainly driven by the transfer of the ING NL motor portfolio from NN Non-Life Insurance N.V. and spread risk changes for market risk and assumption changes for insurance risks.

NN Schade's Solvency II Capital ratio

The following table presents the solvency ratio of NN Schade at year-end 2017 (and reported at year-end 2016):

Ratio (%) (EOF/SCR)	133%	127%
Surplus	127.249	104,166
Solvency Capital Requirement (SCR)	386,089	380,692
Minimum Capital Requirement (MCR)	173,740	171,311
Eligible Own Funds (EOF)	513,338	484,857
In EUR thousand	2017	2016
Solvency ratio		

NN Schade was adequately capitalised at year-end 2017 with a Solvency II ratio of 133% based on the Partial Internal Model. The Solvency II ratio of NN Schade increased to 133% from 127%.



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 2017.

A.1 Business

General

Reference is made to the section 'NN Group and NN Schade at a Glance' in the 2017 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 Westeinde 1 1017 ZN Amsterdam The Netherlands

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

Mr. F.M. (Frank) van den Wildenberg 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 2017 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. NN Insurance Eurasia N.V. is fully owned by NN Group.

As at 31 December 2017, there were no holders of qualifying holdings in NN Group.

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 2017 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 2017 Annual Report of NN Schade and note 32 'Other events' in the 2017 Annual accounts of NN Schade.

Reference is made to the section 'Corporate governance' in the 2017 Annual Report of NN Schade for information on the governance and organisational structure of NN Schade.

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

Simplified group structure

The simplified group structure as at 31 December 2017 is as follows:



As of 1 January 2018 Delta Lloyd Bank N.V. and Delta Lloyd Asset Management N.V. are merged into NN Bank N.V. and NN Investment Partners B.V. respectively.

- As of 1 February 2018 Delta Lloyd Life N.V. (Belgium) has been transferred to NN Continental Europe Holdings B.V. 2 3
- As of 1 March 2018, Delta Llovd Schadeverzekering N.V. is transferred to Nationale-Nederlanden Nederland B.V.

Business and performance continued

A.2 Underwriting Performance (see A.3 below) 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 2017 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 2017 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 2017 Annual accounts of NN Schade.

Information on investment in securitisations is included Note 3 'Available-for-sale investments' in the 2017 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 classified as loans.

A.4 Performance of other activities

NN Schade has no other activities.

A.5 Any other information

Reference is made to the section 'Report of the Management Board' in the 2017 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 2017 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 were implemented over the course of 2017.

This chapter sets out the governance and control framework effective in 2017.

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 33 'Risk management' in the 2017 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 Product Risk Committee, the Model Committee, the Assets & Liabilities Committee and the Crisis Committee.

Roles and responsibilities of key functions

NN Schade has organised its Solvency II key functions in accordance with the applicable Solvency II regulations. All key function holders within NN Schade have passed 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 risk policies
- · Formulating the risk management strategy of NN Schade and ensuring that it is implemented throughout NN Schade
- Monitoring compliance with the overall risk policies of NN Schade
- · Supervising the operation risk management and business control systems of NN Schade
- · Reporting risks and the processes and internal business controls of NN Schade
- Making 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 member of the Management Board in relation to risk management

Compliance function

Reference is made to Note 33 'Risk management' in the 2017 Annual accounts of NN Schade for a description of the Compliance function.

Other functions

The Actuarial Function and Internal Audit Function are also key functions within NN Schade. For a description of these functions, roles and responsibilities and implementation in the NN Schade structure, reference is made to Note 33 'Risk management' in the 2017 Annual accounts of NN Schade .

Remuneration

Remuneration is performed in line with the remuneration policies defined by NN Group. Reference is made to Note 19 'Staff expenses' as disclosed in the 2017 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: https://www.nn-group.com/Who-we-are/Corporate-governance/Remuneration.htm.

Transactions with related parties

Reference is made to Note 30 'Related parties' and Note 31 'Key management personnel compensation' in the 2017 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 31 'Key management personnel compensation' in the 2017 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 33 'Risk management' in the 2017 Annual accounts of NN Schade.

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

Reference is made to Note 33 'Risk management' in the 2017 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, Delta Lloyd Schadeverzekering N.V., 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 33 'Risk management' in the 2017 Annual accounts of NN Schade. Requirements concerning skills, knowledge and expertise applicable to people who have other key functions, are included in the respective job profiles.

In accordance with the NN Group Governance Manual and applicable HR policies, the persons who effectively run NN Schade and the persons fulfilling key functions should be 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'). Where applicable the candidates must pass the DNB or AFM fit and proper test.

All persons holding key functions are assessed against 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 33 'Risk management' in the 2017 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 balanced decision-making processes of NN Schade.

Own Risk and Solvency Assessment

Business strategy and objectives, key risk appetite statements, risk and capital management are aligned in the Own Risk and Solvency Assessment ('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.

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

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, the ORSA:

- 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 the ORSA
- Shall be an integral part of business planning. As such, the ORSA is linked to the strategic management process and related decisionmaking 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 the 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 (Finance & Risk) control cycle. Developments are documented in internal Finance & Risk reports and discussed during board and/or delegated committee meetings. The CRO of NN Schade is responsible for identifying the need of a(n) (partial) ad-hoc ORSA. In such cases, the relevant national supervisory authority is also informed.

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 the 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.

The Actuarial function is to confirm that the base-case and projected technical provisions represent a true and fair view of future liabilities. The Actuarial function also provides input concerning the risks arising from the calculation of technical provisions.

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

- 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.

Stress testing and overall assessment of capital adequacy

Based on the Business Plan and the outcomes of the ORSA risk assessment, (reverse) stress scenarios 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. One of the management actions is a capital downstream to restore solvency ratios.

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

Model Validation

NN Schade's model governance and validation function aims to ensure that NN Schade's models are fit for their intended purpose. Models 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-forlocal-use 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 2017 no material changes to the governance of NN Schade's Partial Internal Model were made.

B.4 The Internal control system

Reference is made to Note 33 'Risk management' of the 2017 Annual accounts of NN Schade for a description of the implementation of the Internal control system.

B.5 Internal audit function

Reference is made to Note 33 'Risk management' of the 2017 Annual accounts of NN Schade for a description of the implementation of the internal audit function.

B.6 Actuarial function

Reference is made to Note 33 'Risk management' of the 2017 Annual accounts of NN Schade for a description of the implementation of the actuarial function.

B.7 Outsourcing

External Outsourcing arrangements

In 2017 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.

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 Group. Transactions with entities within the 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 for insurance and other entities
- Various other shared services, including finance and information technology, carried out by group companies for insurance and other entities
- 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 B.V. 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
- 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 2017 Annual report of NN Schade and the NN Group website: <u>https://www.nn-group.com/Who-we-are/Corporate-governance/Corporate-governance.htm</u> for other material information regarding the system of governance of NN Schade and NN Group. oital nagement

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 33 'Risk management' in the 2017 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 Non-market risk (Underwriting risk)

Non-Market risk is disclosed as insurance risk and business risk in Note 33 'Risk management' in the 2017 Annual accounts of NN Schade.

C.2 Market risk

Market risk is disclosed in Note 33 'Risk management' in the 2017 Annual accounts of NN Schade.

C.3 Counterparty risk (Credit risk)

Counterparty Default risk is disclosed in Note 33 'Risk management' in the 2017 Annual accounts of NN Schade.

C.4 Liquidity risk

Liquidity risk is disclosed in Note 33 'Risk management' in the 2017 Annual accounts of NN Schade.

C.5 Operational risk

Operational risk is disclosed in Note 33 'Risk management' in the 2017 Annual accounts of NN Schade.

C.6 Other material risks

Business conduct risk

Business conduct risk is the risks related to unethical or irresponsible corporate behaviour, inappropriate employee behaviour and customer suitability of products. For more details reference is made to Note 33 'Risk management' in the 2017 Annual accounts of NN Schade.

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 33 'Risk management' in the 2017 Annual accounts of NN Schade.

Investing assets in accordance with the 'Prudent person principle'

Acceptable investments

NN Schade complies with the prudent person principles as set out in Directive 2009/138/EC/article 132: Prudent person principle. 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).

Governance of investments

Within the three lines-of -defence model, investments are managed in the first line in close cooperation with NN Investment Office, reporting directly to the CFO of NN Schade. The second line function 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, which also provides (unsolicited) advice on proposed or current investments.

Risk prof

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

- Asset Class Standard (NICARP)
- Investment Management Policy
- Concentration Risk Standard
- ALM policy
- Financial Regulations Standard
- Responsible Investment framework policy

Investment Office

Based on market views, local Business Unit requirements, input from its assets managers, the Investment Office, which is headed by 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
- 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 Investment Office.

Sensitivity analysis

Reference is made Note 33 'Risk management' in the 2017 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.

Other material risks

Reference is made to the section 'Report of the Management Board' in the 2017 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 33 'Risk management' in the 2017 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 2017, 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 33 'Risk management' in the 2017 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.

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 2017 Annual accounts.

Reconciliation IFRS Balance sheet to Solvency II Balance sheet

As at 31 December 2017. In EUR thousand	IFRS	Presentation differences	Valuation differences	Solvency II
Assets		unrerences	unrerenees	borrency in
Cash and cash equivalents	4,684			4,684
Available-for-sale investments	2,177,219	36,047	50	2,213,315
Loans and advances	777,476	2,314	47,288	827,077
Reinsurance contracts	15,189		-9,734	5,455
Associates	10,074			10,074
Intangible assets	648		-648	
Deferred acquisition costs	40,267		-40,267	
Other assets	176,778	-38,361		138,417
Total assets	3,202,335		-3,313	3,199,022
Equity				
Shareholders' equity	510.700		2.638	513,338
Total equity / Excess of assets over liabilities	510,700		2,638	513,338
Liabilities				
Other borrowed funds	44,000	-55		43,945
Insurance contracts	2,538,413		-6,810	2,531,603
– non-trading derivatives				
Deferred tax liabilities	47,258		859	48,117
Other liabilities	61,964	55		62,020
Total liabilities	2,691,635		-5,951	2,685,684
Total equity and liabilities	3,202,335		-3,313	3,199,022

Reference is made to the 2017 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 33 'Risk Management' in the 2017 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 23 'Fair value of financial assets and liabilities' in the 2017 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 23 'Fair value of financial assets and liabilities' in the 2017 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 36,047 thousand as at 31 December 2017 are caused by presentation of accrued interest as part of the 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 2017 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 2017 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 47,288 thousand as at 31 December 2017. Presentation differences of EUR 2,341 thousand as at 31 December 2017 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 2017 Annual accounts of NN Schade ('clean market value').

Reinsurance contracts

Reference is made to section D2 'Technical provisions' of this SFCR.

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

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.

Presentation differences of EUR 38,361 thousand as at 31 December 2017 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 2017 Annual accounts of NN Schade ('clean market value').

Changes in valuation bases

During 2017, 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.

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 2017:

Value of technical provisions by Solvency II Business Line

As at 31 December 2017. In EUR thousand	BEL	Risk margin	Technical provisions
Technical provision by Solvency II Business line:			
1. Non-Life	725,247	38,649	763,896
2. Health similar to Non-Life	169,470	10,758	180,229
3. Health similar to Life	1,519,889	67,590	1,587,478
Total	2,414,605	116,997	2,531,603

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 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.

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

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

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 2017, the EIOPA and NN Schade curves were consistent.

Changes in assumptions

During 2017, 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 33 'Risk Management' in the 2017 Annual accounts of NN Schade.

Main differences between IFRS and Solvency II valuation of technical provisions

		Valuation	
As at 31 December 2017. In EUR thousand	IFRS	differences	Solvency II
Technical provision by Solvency II Business line:			
1. Non-Life	851,088	-87,192	763,896
2. Health similar to Non-Life	195,490	-15,262	180,229
3. Health similar to Life	1,491,835	95,643	1,587,478
Total	2,538,413	-6,810	2,531,603

Summary of main differences between IFRS and Solvency II as at 31 December 2017

At 31 December 2017, 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 6,810 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 so-called 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
- Matching Adjustment

on:

- Technical provisions
- Basic own funds
- Eligible Own Funds to meet Solvency Capital Requirement
- Solvency Capital Requirement

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

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 Volatility adjustment component. As at 31 December 2017, the level of the VOLA for the Euro currency was 4 bps.

The application of the VOLA resulted in a reduction of EUR 6,297 thousand in technical provisions, contributing EUR 4,723 thousand (after tax) to Basic own funds as at 31 December 2017. Excluding the VOLA from the calculation of technical provisions would reduce the eligible own funds by EUR 4,723 thousand.

In the calculation of the SCR, NN Schade assumes no change to the VOLA after a shock-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.

If the Dynamic VOLA would be excluded from the SCR calculation, the spread risk on government bonds and mortgages would, in the opinion of NN Schade, 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 investment grade government bonds from the SCR, in combination with removing the VOLA from Eligible Own Funds. In such scenario, the SCR would be EUR 48,022 thousand higher and Eligible Own Funds would be EUR 4,723 thousand lower.

Amount without Long Term Guarantee measures and transitionals

		Impact of volatility	
	Amount with Long Term Guarantee measures and	adjustment set to zero and eliminating additional credit spread	Amount without Long Term Guarantee measures and
	transitionals	shock	transitionals
As at 31 December 2017. In EUR Thousand	(A)	(B)	(C) =(A)-(B)
Technical provisions	2,531,603	6,297	2,537,900
Basic own funds	513,338	-4,723	508,615
Eligible Own Funds to meet Solvency Capital Requirement (1)	513,338	-4,723	508,615
Solvency Capital Requirement (2)	386,089	48,022	434,111

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 55 thousand as at 31 December 2017. 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 2017 Accounts of NN Schade ('clean market value').

Deferred tax liabilities and 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 and liabilities as set out in sections D.1 'Assets', D.2 'Technical provisions' and D.3 'Other liabilities' EUR 859 thousand higher deferred tax liabilities are recognised in the Solvency II balance sheet as at 31 December 2017.

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.

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 2017 Annual accounts of NN Schade ('clean market value'). Presentation differences amounted to EUR 55 thousand as at 31 December 2017.

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 2017).

For more details on other provisions and contingent liabilities, reference is made to Note 28 'Contingent liabilities and commitments' in the 2017 Annual accounts of NN Schade.

Leasing

Information on operating lease arrangements are recognised in Note 21 'Other operating expenses' and Note 28 'Contingent liabilities and commitments' in the 2017 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.23.01.01 '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 25 'Liabilities by maturity' in the 2017 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 33 'Risk management' in the 2017 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 2017

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 23 'Fair value of financial assets and liabilities' in the 2017 Annual accounts of NN Schade for more information on the valuation approaches used.

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 2017 Annual accounts of NN Schade. The valuation methods used if the markets are inactive are described in Note 23 '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 33 'Risk Management' in the 2017 Annual accounts of NN Schade.

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Capital management

Capital management

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 34 'Capital management' in the 2017 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 2017 or as at 31 December 2017.

Impact of long term guarantees and 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.23.01.01 'Own funds' as included in the Appendix plus those that are included by reference into this report.

Analysis of significant changes in own funds

Reference is made to Note 34 'Capital management' in the 2017 Annual accounts of NN Schade for an analysis of significant changes in own funds.

The principal loss-absorbency mechanism

During 2017, NN Schade had no subordinated liabilities issued by NN Schade.

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.23.01.01 'Own funds' in the Appendix to this report.

Business and System of governance Risk profile purposes manage		F	-)	6	
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As at 31 December 2017 NN Schade does not have any deductions for foreseeable dividends, distributions and charges.

Reconciliation IFRS equity to Own Funds

Reconciliation IFRS equity to Solvency II Basic Own Funds

In EUR thousand	2017	2016
IFRS 'Shareholders' Equity	510,700	539,146
Elimination of deferred acquisition costs and other intangible assets	-40,915	-38,644
Valuation differences on assets	37,603	37,144
Valuation differences on liabilities, including insurance and investment contracts	6,811	-70,915
Deferred tax effects on valuation differences	-860	18,126
Excess assets/ liabilities	513,338	484,857
Foreseeable dividends and distributions		
Basic Own Funds	513,338	484,857

The differences between IFRS Shareholders' Equity in NN Schade's 2017 Annual accounts and Solvency II Basic Own Funds of NN Schade as at 31 December 2017 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 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

Reference is made to QRT S.25.02.21 in the Appendix and Note 33 'Risk management' in the 2017 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 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 certain equity securities and the equity shock in the SCR on these securities do 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:

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 Q&As 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.

Capital management

NN Group holds the capital buffers for the Group companies. Therefore after a 1-in-200 adverse event 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 may be included in determining the total recoverable deferred tax amount:

- The amount of the risk margin in the technical provision
- Return on capital after the shock
- Reversal of the net effects of the credit-spread shock
- Investment spread in excess of interest accretion on technical provisions and funding costs over their (expected average) remaining duration. Profits from estimated new business
- Net fee income
- Carry-back

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

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 34 'Capital management' in the 2017 Annual accounts of NN Schade.

Minimum Capital Requirement

In EUR thousand	2017	2016
Eligible Own Funds to cover MCR	513,338	484,857
of which Tier 1 unrestricted	513,338	484,857
MCR	173,740	171,311

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.
- The internal model accounts for the volatility adjuster in the liability discount rate by means of a dynamic volatility adjustment. Reference is made to section D.2 (in paragraph 'Matching and volatility adjustment, transitional measures and transitional risk-free interest rate term structure' on page 21) for further information on NN Schade's 'Dynamic VOLA'

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'):

Business and performance System of Risk profile Solvency purposes Capital management		
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In addition to the risks covered in the Standard Formula, the Internal Model includes the following risks (in addition to the differences mentioned in the beginning of section E4):

- 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

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
 - The Internal Model allows for negative interest rates, whereas the Standard Formula does not
 - 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
 - In the internal model NN Schade convergence to the UFR after shock and thereby follow the dynamics of the balance sheet, whereas in the Standard Formula there is no convergence to the UFR after shock
- Equity Risk:
 - Level of shocks differs mainly because it is calibrated to the equity portfolio of NN Group
- Credit Spread Risk:
 - 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
 - In the Internal Model mortgages and loans are treated under Credit Spread Risk, whereas in the Standard Formula these are shocked as part of Counterparty Default Risk
- 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
- 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.

Business and performance	System of governance	Risk profile	Valuation for Solvency purposes	Capital manageme
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The table below shows the results for the steps described above.

Solvency Capital Requirement

In EUR thousand	2017	2016
Market risk	165,193	158,665
Non-market risk	447,439	443,862
Diversification	-153,144	-150,270
Partial Internal Model BSCR	459,488	452,256
Operational Risk	42,864	41,846
Loss absorbing Capacity of Deferred Taxes	-116,263	-113,410
Total SCR	386,089	380,692

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

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 48 million as at 31 December 2017 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 153 million as at 31 December 2017

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

Capital management

- 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 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.

Reference is made to Note 34 'Capital management' in the 2017 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 34 'Capital management' in the 2017 Annual accounts of NN Schade for any other material information regarding the capital management of NN Schade.

Business and performance	System of governance	Risk profile	Valuation for Solvency purposes	Capital management
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Appendix 1

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 Schade, required to be reported to DNB and to be publicly disclosed:

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

All amounts in this appendix are recorded in EUR thousand.

Appendix 1 continued

S.02.01.02 Balance 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 & equipement held for own use	R0060	
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	2,233,533
Property (other than for own use)	R0080	
Holdings in related undertakings, including participations	R0090	10,074
Equities	R0100	75,891
Equities - listed	R0110	59,539
Equities - unlisted	R0120	16,352
Bonds	R0130	1,742,532
Government Bonds	R0140	1,310,281
Corporate Bonds	R0150	422,108
Structured notes	R0160	
Collateralised securities	R0170	10,143
Collective Investments Undertakings	R0180	405,036
Derivatives	R0190	
Deposits other than cash equivalents	R0200	
Other investments	R0210	
Assets held for index-linked and unit-linked contracts	R0220	
Loans and mortgages	R0230	814,125
Loans on policies	R0240	
Loans and mortgages to individuals	R0250	580,499
Other loans and mortgages	R0260	233,626
Reinsurance recoverables from:	R0270	5,455
Non-life and health similar to non-life	R0280	9,969
Non-life excluding health	R0290	10,072
Health similar to non-life	R0300	-104
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	-4,514
Health similar to life	R0320	-4,514
Life excluding health and index-linked and unit-linked	R0330	
Life index-linked and unit-linked	R0340	
Deposits to cedants	R0350	2,809
Insurance and intermediaries receivables	R0360	61,403
Reinsurance receivables	R0370	1,101
Receivables (trade, not insurance)	R0380	68,988
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	4,684
Any other assets, not elsewhere shown	R0420	6,925
Total assets	R0500	3,199,022

Business and System of Solvency Capital performance governance Risk profile purposes management	
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Appendix 1 continued

		Solvency II
	-	value C0010
Liabilities		
Technical provisions – non-life	R0510	944,124
Technical provisions – non-life (excluding health)	R0520	763,896
Technical provisions calculated as a whole	R0530	
Best Estimate	R0540	725,247
Risk margin	R0550	38,649
Technical provisions - health (similar to non-life)	R0560	180,229
Technical provisions calculated as a whole	R0570	
Best Estimate	R0580	169,470
Risk margin	R0590	10,758
Technical provisions - life (excluding index-linked and unit-linked)	R0600	1,587,478
Technical provisions - health (similar to life)	R0610	1,587,478
Technical provisions calculated as a whole	R0620	
Best Estimate	R0630	1,519,889
Risk margin	R0640	67,590
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	4,521
Pension benefit obligations	R0760	
Deposits from reinsurers	R0770	
Deferred tax liabilities	R0780	48,117
Derivatives	R0790	
Debts owed to credit institutions	R0800	43,945
Financial liabilities other than debts owed to credit institutions	R0810	
Insurance & intermediaries payables	R0820	22,933
Reinsurance payables	R0830	1,338
Payables (trade, not insurance)	R0840	33,228
Subordinated liabilities	R0850	
Subordinated liabilities not in Basic Own Funds	R0860	
Subordinated liabilities in Basic Own Funds	R0870	
Any other liabilities, not elsewhere shown	R0880	-0
Total liabilities	R0900	2,685,684
Excess of assets over liabilities	R1000	513,338
S.05.01.02 Premiums, claims and expenses by line of business

	-	Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)								
		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
		C0020	C0040	C0050	C0060	C0070	C0080	C0100	C0120	C0200
Premiums written										
Gross - Direct Business	R0110	273,490	134,003	104,855	18,284	347,588	123,758	42,812	2,251	1,047,040
Gross - Proportional reinsurance										
accepted	R0120	2	23		1	1,051	1,513			2,589
Gross - Non-proportional reinsurance										
accepted	R0130									
Reinsurers' share	R0140	1,145	1,032	203	252	11,478	1,600			15,709
Net	R0200	272,347	132,994	104,652	18,032	337,161	123,671	42,812	2,251	1,033,920
Premiums earned										
Gross - Direct Business	R0210	273,851	134,950	104,375	18,202	349,719	123,910	41,657	2,243	1,048,906
Gross - Proportional reinsurance										
accepted	R0220	2	24		1	1,060	1,568			2,655
Gross - Non-proportional reinsurance										
accepted	R0230									
Reinsurers' share	R0240	1,145	963	203	252	11,483	1,626			15,671
Net	R0300	272,708	134,011	104,172	17,950	339,297	123,852	41,657	2,243	1,035,890
Claims incurred										
Gross - Direct Business	R0310	188,316	159,854	55,702	7,883	156,627	91,822	24,950	253	685,407
Gross - Proportional reinsurance										
accepted	R0320	-0	5		-0	297	120			421
Gross - Non-proportional reinsurance	Baaaa									
accepted	R0330									
Reinsurers' share	R0340	270	332			959	1,378			2,939
Net	R0400	188,046	159,527	55,702	7,883	155,965	90,564	24,950	253	682,890
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	84,800	63,428	40,051	8,022	157,180	65,477	12,906	801	432,665
Other expenses	R1200									
Total expenses	R1300									432,665

	-	Line of Business for: life insurance obligations Health insurance C0210	Total
Premiums written		0210	0000
Gross	R1410	277,885	277,885
Reinsurers' share	R1420	3,572	3,572
Net	R1500	274,313	274,313
Premiums earned			
Gross	R1510	282,932	282,932
Reinsurers' share	R1520	3,572	3,572
Net	R1600	279,360	279,360
Claims incurred			
Gross	R1610	209,211	209,211
Reinsurers' share	R1620	-1,224	-1,224
Net	R1700	210,434	210,434
Changes in other technical provisions			
Gross	R1710		
Reinsurers' share	R1720		
Net	R1800		
Expenses incurred	R1900	90,159	90,159
Other expenses	R2500		
Total expenses	R2600		90,159

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				
Gross - Direct Business	R0110	1,047,040	1,047,040	
Gross - Proportional reinsurance accepted	R0120	2,589	2,589	
Gross - Non-proportional reinsurance accepted	R0130			
Reinsurers' share	R0140	15,709	15,709	
Net	R0200	1,033,920	1,033,920	
Premiums earned				
Gross - Direct Business	R0210	1,048,906	1,048,906	
Gross - Proportional reinsurance accepted	R0220	2,655	2,655	
Gross - Non-proportional reinsurance accepted	R0230			
Reinsurers' share	R0240	15,671	15,671	
Net	R0300	1,035,890	1,035,890	
Claims incurred				
Gross - Direct Business	R0310	685,407	685,407	
Gross - Proportional reinsurance accepted	R0320	421	421	
Gross - Non-proportional reinsurance accepted	R0330			
Reinsurers' share	R0340	2,939	2,939	
Net	R0400	682,890	682,890	
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	432,665	432,665	
Other expenses	R1200	,		
Total expenses	R1300	432,665	432,665	

Total Top 5 and

Home Country home country

		C0150	C0210
	R1400		
		C0220	C0280
Premiums written			
Gross	R1410	277,885	277,885
Reinsurers' share	R1420	3,572	3,572
Net	R1500	274,313	274,313
Premiums earned			
Gross	R1510	282,932	282,932
Reinsurers' share	R1520	3,572	3,572
Net	R1600	279,360	279,360
Claims incurred			
Gross	R1610	209,211	209,211
Reinsurers' share	R1620	-1,224	-1,224
Net	R1700	210,434	210,434
Changes in other technical provisions			
Gross	R1710		
Reinsurers' share	R1720		
Net	R1800		
Expenses incurred	R1900	90,159	90,159
Other expenses	R2500		
Total expenses	R2600		90,159

S.12.01.02 Life and Health SLT Technical Provisions

	_	wi	Health insurance (direct business) Contracts without options and guarantees	
		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		1,519,889	1,519,889
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected				
losses due to counterparty default	R0080		-4,514	-4,514
Best estimate minus recoverables from reinsurance/SPV and Finite Re - total	R0090		1,524,403	1,524,403
Risk Margin	R0100	67,590		67,590
Amount of the transitional on Technical Provisions				
Technical Provisions calculated as a whole	R0110			
Best estimate	R0120			
Risk margin	R0130			
Technical provisions - total	R0200	1,587,478		1,587,478

S.17.01.02 Non-life Technical Provisions

	Direct business and accepted proportional reinsurance										
		Matau		Marine,	Fire and			Missellans			
	Income protection insurance C0030	Motor vehicle liability insurance C0050	Other motor insurance C0060	aviation and transport insurance C0070	other damage to property insurance C0080	General liability insurance C0090	Legal expenses insurance C0110	Miscellane ous financial loss C0130	Total Non- Life obligation C0180		
Technical provisions calculated as a											
whole R00	0										
Total Recoverables from											
reinsurance/SPV and Finite Re after											
the adjustment for expected losses due											
to counterparty default associated to											
TP as a whole R005	0										
Technical provisions calculated as a sum of BE and RM											
Best estimate											
Premium provisions											
Gross R006	0 -9.028	26,747	10,648	-755	38,103	876	396	-138	66,849		
Total recoverable from									· · ·		
reinsurance/SPV and Finite Re after											
the adjustment for expected losses due											
to counterparty default R014	0 -104	-31	1	-88	-2,591	-639	0	0	-3,452		
Net Best Estimate of Premium											
Provisions R015	0 -8,924	26,778	10,647	-667	40,694	1,515	396	-138	70,301		
Claims provisions											
Gross R016	0 178,498	296,679	17,989	8,197	99,391	216,740	9,387	985	827,868		
Total recoverable from											
reinsurance/SPV and Finite Re after											
the adjustment for expected losses due											
to counterparty default R024		2,300	0	32	971	10,118	0	0	13,421		
Net Best Estimate of Claims Provisions R025		294,379	17,989	8,165	98,420	206,622	9,387	985	814,447		
Total Best estimate - gross R026		323,426	28,637	7,442	137,494	217,616	9,784	848	894,717		
Total Best estimate - net R027		321,158	28,636	7,498	139,114	208,138	9,784	848	884,748		
Risk margin R028	0 10,758	9,293	2,155	728	8,979	16,538	898	59	49,408		
Amount of the transitional on Technical											
Provisions											
Technical Provisions calculated as a											
whole R029	-										
Best estimate R030	0										
Risk margin R03	0										
Technical provisions - total											
Technical provisions - total R032	.0 180,229	332,719	30,792	8,170	146,473	234,154	10,682	906	944,124		
Recoverable from reinsurance											
contract/SPV and Finite Re after the											
adjustment for expected losses due to											
counterparty default - total R033	0 -104	2,269	1	-56	-1,620	9,478	0	0	9,969		
Technical provisions minus											
recoverables from reinsurance/SPV											
and Finite Re - total R034	0 180,332	330,451	30,791	8,226	148,093	224,675	10,682	906	934,156		

Business and performance	System of governance	Risk profile	Valuation for Solvency purposes	Capital management
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S.19.01.21 Non-Life insurance claims (Gross claims paid)

											Developm	nent 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											18,100
N-9	R0160	308,489	170,871	39,202	17,006	12,773	10,358	8,651	8,171	7,858	8,274	
N-8	R0170	354,743	170,763	45,247	18,556	10,128	11,973	7,996	8,534	4,817		
N-7	R0180	357,387	188,057	45,586	15,084	11,577	9,130	7,344	6,035			
N-6	R0190	366,675	189,342	40,539	18,121	13,180	14,640	10,106				
N-5	R0200	331,706	176,249	40,961	20,176	14,691	9,884					
N-4	R0210	313,205	202,131	36,968	24,858	15,376						
N-3	R0220	311,801	177,078	45,364	18,129							
N-2	R0230	307,706	176,905	36,566								
N-1	R0240	321,760	197,560									
Ν	R0250	309,752										

			Sum of years
		In Current year	(cumulative)
		C0170	C0180
Prior	R0100	18,100	18,100
N-9	R0160	8,274	591,653
N-8	R0170	4,817	632,757
N-7	R0180	6,035	640,200
N-6	R0190	10,106	652,603
N-5	R0200	9,884	593,667
N-4	R0210	15,376	592,537
N-3	R0220	18,129	552,372
N-2	R0230	36,566	521,177
N-1	R0240	197,560	519,319
N	R0250	309,752	309,752
Total	R0260	634,600	5,624,137

Business and performance	System of governance	Risk profile	Valuation for Solvency purposes	Capital management
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S.19.01.21 Non-Life insurance claims (Gross undiscounted best estimate claims provisions)

											Developn	nent 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											61,008
N-9	R0160									17,060	12,363	
N-8	R0170								14,899	11,810		
N-7	R0180							24,682	20,624			
N-6	R0190						30,431	23,809				
N-5	R0200					41,054	30,549					
N-4	R0210				63,491	49,079						
N-3	R0220			94,365	78,822							
N-2	R0230		130,815	81,388								
N-1	R0240	303,956	149,440									
Ν	R0250	327,974										

		Year end (discounted data)
		C0360
Prior	R0100	58,961
N-9	R0160	11,949
N-8	R0170	11,417
N-7	R0180	19,956
N-6	R0190	23,053
N-5	R0200	29,602
N-4	R0210	47,623
N-3	R0220	76,240
N-2	R0230	79,480
N-1	R0240	146,080
N	R0250	323,506
Total	R0260	827,868

S.22.01.21 Impact of long term guarantees and transitional measures

	-	Amount with LTG measures and transitionals C0010	Impact of transitional on technical provisions C0030	Impact of transitional on interest rate C0050	Impact of volatility adjustment set to zero 1) C0070	Impact of matching adjustment set to zero C0090
Technical provisions R	0010	2,531,603			6,297	
Basic own funds Re	0020	513,338			-4,723	
Eligible own funds to meet SCR R	0050	513,338			-4,723	
SCR R(0090	386,089			116,977	
Eligible own funds to meet MCR R	0100	513,338			-4,723	
Minimum Capital Requirement F	R0110	173,740			37,333	

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.

S.23.01.01 Own funds

		Total C0010	Tier 1 - unrestricted C0020	Tier 1 - restricted C0030	Tier 2 C0040	Tier 3 C0050
Basic own funds before deduction for participations in other		0010	C0020	0030	C0040	C0050
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	502,832	502,832			
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	Daaaa					
meet the criteria to be classified as Solvency II own funds	R0220					
Deductions						
Deductions for participations in financial and credit	Doooo					
institutions	R0230		=			
Total basic own funds after deductions	R0290	513,338	513,338			
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	5.0010					
mutual - type undertakings, callable on demand	R0310					
Unpaid and uncalled preference shares callable on	DODDO					
demand A legally binding commitment to subscribe and pay for	R0320					
subordinated liabilities on demand	R0330					
Letters of credit and guarantees under Article 96(2) of the	10000					
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	844-1					
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	513,338	513,338			
Total available own funds to meet the MCR	R0510	513,338	513,338			
Total eligible own funds to meet the SCR	R0540	513,338	513,338			
Total eligible own funds to meet the MCR	R0550	513,338	513,338			
SCR	R0580	386,089				
MCR	R0600	173,740				
Ratio of Eligible own funds to SCR	R0620	1.33				

		C0060
Reconciliation reserve		
Excess of assets over liabilities	R0700	513,338
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	502,832
Expected profits		
Expected profits included in future premiums (EPIFP) - Life business	R0770	
Expected profits included in future premiums (EPIFP) - Non- life business	R0780	84,602
Total Expected profits included in future premiums (EPIFP)	R0790	84,602

S.25.02.21 Solvency Capital Requirement - for undertakings using the standard formula and partial internal model

Unique number of component	Components description	Calculation of the Solvency Capital Requirement	Amount modelled	USP	Simplifications
C0010	C0020	C0030	C0070	C0090	C0120
	Total capital requirement for				
1001	market risk	165,193	165,193		
	Total capital requirement for				
1003	counterparty default risk	152	152		
1004	Overall Insurance Risk	395,089	395,089		
1005	Overall Business Risk	52,198	52,198		
1006	Operational risk	42,864	42,864		
	Loss absorbing capacity for				
	deferred taxes if not modelled				
9	within components	-116,263	-116,263		

C0100 **Calculation of Solvency Capital Requirement** Total undiversified components R0110 539,233 Diversification R0060 -153,144 Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC R0160 386,089 Solvency capital requirement excluding capital add-on R0200 386,089 Capital add-ons already set R0210 Solvency capital requirement R0220 386,089 Other information on SCR Amount/estimate of the overall loss-absorbing capacity of technical provisions R0300 Amount/estimate of the overall loss-absorbing capacity ot deferred taxes R0310 -116,263 Capital requirement for duration-based equity risk sub-module R0400 Total amount of Notional Solvency Capital Requirements for remaining part R0410 Total amount of Notional Solvency Capital Requirements for ring fenced funds R0420 Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios R0430 Diversification effects due to RFF nSCR aggregation for article 304 R0440

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

		C0010
MCRnL Result	R0010	178,823

		Net (of reinsurance/SP V) best estimate and TP calculated as a whole C0020	Net (of reinsurance) written premiums in the last 12 months C0030
Medical expense insurance and proportional reinsurance	R0020		
Income protection insurance and proportional reinsurance	R0030	169,574	272,347
Workers' compensation insurance and proportional reinsurance	R0040		
Motor vehicle liability insurance and proportional reinsurance	R0050	321,158	132,994
Other motor insurance and proportional reinsurance	R0060	28,636	104,652
Marine, aviation and transport insurance and proportional reinsurance	R0070	7,498	18,032
Fire and other damage to property insurance and proportional reinsurance	R0080	139,114	337,161
General liability insurance and proportional reinsurance	R0090	208,138	123,671
Credit and suretyship insurance and proportional reinsurance	R0100		
Legal expenses insurance and proportional reinsurance	R0110	9,784	42,812
Assistance and proportional reinsurance	R0120		
Miscellaneous financial loss insurance and proportional reinsurance	R0130	848	2,251
Non-proportional health reinsurance	R0140		
Non-proportional casualty reinsurance	R0150		
Non-proportional marine, aviation and transport reinsurance	R0160		
Non-proportional property reinsurance	R0170		

		C0040
MCRL Result	R0200	32,012

		TP calculated as a whole	Net (of reinsurance/SP V) 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	1,524,403	
Total capital at risk for all life (re)insurance obligations	R0250		

		C0070
Linear MCR	R0300	210,836
SCR	R0310	386,089
MCR cap	R0320	173,740
MCR floor	R0330	96,522
Combined MCR	R0340	173,740
Absolute floor of the MCR	R0350	3,700
		C0070
Minimum Capital Requirement	R0400	173,740

Contact us

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