2021
Solvency and Financial Condition Report

Nationale-Nederlanden Schadeverzekering Maatschappij N.V.

nationale nederlanden

Solvency and Financial Condition Report

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 2021 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).

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 2021, 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).

Covid-19 pandemic

Since early 2020, the spread of the Covid-19 pandemic is causing significant disruption to society and the world-wide economy, impacting NN Schade, its employees, its customers and its suppliers. Financial markets had been severely impacted by significant volatility in interest rates, equity prices and spreads and the world-wide economy had been significantly impacted as well. Governments and central banks worldwide were responding to this crisis with aid packages and further supporting measures. NN Schade was constantly monitoring the developments and the (potential) impact on NN Schade. The most significant risks that NN Schade was facing in this context were related to the financial markets (including interest rates, inflation, equity prices and spreads), insurance risk (including disability and illness and policyholder behaviour) and operational risk (continuity of business processes).

The Covid-19 pandemic, and the related impact on the financial markets, impacted the financial reporting of NN Schade mainly through additional uncertainties in the determination of the fair value of illiquid assets, including real estate investments and private equity investments. NN Schade uses quarterly appraisals by external valuers as main input for the determination of fair value of its real estate investments. During 2020, uncertainties in the environment had led to the inclusion of 'material valuation uncertainty' clauses in certain external valuation reports. Such clauses do not imply that the valuation cannot be relied upon, but are used to indicate that – in the current extraordinary circumstances – less certainty can be attached to valuations than would otherwise be the case.

In 2021, the Covid-19 pandemic continued, but the impact on NN Schade's financial reporting in 2021 was limited. While real estate valuations remain complex and uncertain, the specific valuation uncertainty clauses were no longer included in real estate appraisals by external appraisers in the valuations and there were no significant impairments (including debt and equity securities, loans and intangible assets). For NN Schade's disability insurance contracts there are both direct effects from insureds being affected by Covid-19, as well as indirect effects from longer disability as treatment is postponed. For specific portfolios this may lead to increased claims; however the observed and expected financial impact for NN Schade is not significant. Note 41 'Risk management' in the 2021 Annual Report includes extensive disclosure on the exposure to such risks and the risk management thereof.

NN Schade has established a business continuity plan to help ensure the continuity of its businesses, the well-being of its staff and its capability to support its customers, whilst maintaining financial and operational resilience.

Material changes in 2021

On 31 December 2020, NN Schade entered into a legal merger with VIVAT Schade. On 1 January 2021, the legal merger between NN Schade and VIVAT Schade became effective. In accordance with the deed of merger, the financial data of VIVAT Schade have been included in the annual accounts of NN Schade as from 1 April 2020. As a result of this merger, VIVAT Schade ceased to exist as a separate legal entity and NN Schade acquired all assets and liabilities of VIVAT Schade under universal title of succession. This merger was between companies with the same parent ('under common control'), as well.

NN Schade runned in 2020 and 2021 dedicated programme to efficiently integrate the acquired VIVAT Non-Life portfolio both commercially as well as financially in a controlled manner. This integration has been completed towards the end of 2021.

In October 2021 NN Group ('NN') acquired a 70% stake in the insurance broker and service provider Heinenoord, for a total consideration of EUR 179 million. In addition, NN is also going to refinance the outstanding debt granted to Heinenoord for an amount of EUR 129 million. The agreement includes an option structure to acquire the remaining 30% of shares by NN within four years, following the closing of the transaction. Heinenoord is one of the largest insurance brokers and service providers in the Dutch insurance market offering, amongst other things, policy administration, underwriting services and claims handling.

In 2021 NN Group acquired Qare Nederland Holding B.V. (Qare) in order to be able to continue to build services and scope. Qare is a full-service partner on health and safety services, case management, re-integration and employability. As a result, we are able to meet a growing need for innovative solutions in the field of risk and case management for absenteeism and disability. In 2022 the Qare organization will be integrated into HCS.

NN Schade is in the process of expanding its Partial Internal Model (NN PIM) to include the former VIVAT Non-life business. Prior to the formal completion thereof, NN Schade calculates the SCR for the merged entity using the NN PIM including a Transitional Capital Lock-In (TCLI). The TCLI amounts to EUR 181 million and resembles the impact of reporting the former VIVAT Non-life business on the Solvency II standard formula versus the NN PIM.

The full-year 2021 operating result of NN Schade improved to EUR 253 million from EUR 172 million in 2020. The increase reflects higher underwriting results in both P&C and D&A and higher investment income following the shift to higher yielding assets.

The higher underwriting results in P&C reflect a favourable claims development, including a positive impact from Covid-19. Higher underwriting results in D&A include more favourable claims development in the Group Income and Accident & Travel portfolios, partly offset by higher claims experience in the Individual Disability portfolio including a negative impact from Covid-19.

The full-year 2021 result before tax increased to EUR 241 million from EUR 123 million in 2020, reflecting the higher operating result, and lower special items. Higher non-operating items include realised gains on the sale of public equity as well as government bonds. Special items mainly reflect integration expenses.

The combined ratio for 2021 was 94% compared with 96% in 2020.

Overall, in 2021 NN Schade delivered a solid financial performance. The NN Schade strategy was updated and progress was made on the strategic priorities. NN Schade's ambition for 2022 is to continue the solid financial performance whilst executing the strategic initiatives needed to achieve our strategic objectives. NN Schade will keep an unwavering focus on improving the customer experience. NN Schade will continue to execute the VIVAT integration. In addition, NN Schade aims to increase its role in society by improving the product and service offering as well as supporting social initiatives.

With regard to the calculation of deferred tax the change in tax law, that was approved in December 2021, was included.

Eligible Own Funds

Solvency II requires to hold Eligible Own Funds for covering the Solvency Capital Requirement. The Eligible Own Funds are classified in three tiers depending on whether the own funds items are available to absorb losses on a going concern basis and/or in the case of winding-up as prescribed in the Solvency II Legislation. Tier 1 Own Funds items are the highest grade capital and Tier 3 Own Funds are the lowest grade capital.

Eligible Own Funds

In EUR thousand	2021	2020
Tier 1 (restricted and unrestricted)	1,551,734	1,320,814
Tier 2	152,328	154,248
Tier 3	0	0
Total Eligible Own Funds	**1,704,062**	**1,475,062**

Eligible Own Funds increased EUR 229,000 thousand to EUR 1,704,062 thousand in 2021. This increase is mainly to strong positive experience and economic variances, offset by a dividend payment of EUR 70 million.

Impact of long term guarantees and transitional measures

The quantification of the impact of a change to zero of the volatility adjustment on NN Schade 's Solvency capital ratio - represented by an adjustment on the amount of technical provisions, the SCR, the Basic Own Funds and the Eligible Own Funds is included in the paragraph 'Matching and volatility adjustment, transitional measures and transitional risk-free interest rate term structure' in Section D.2 and QRT S.22.01.21 'Impact of long term guarantees and transitional measures' in the Appendix.

Solvency Capital Requirement

On 31 December 2020, NN Schade entered into a legal merger with VIVAT Schadeverzekeringen N.V. (VIVAT Non-life). As a result, VIVAT Non-life ceased to exist as a separate legal entity and NN Schade assumed all assets and liabilities of VIVAT Non-life under universal title of succession. NN Schade is in the process of expanding its Partial Internal Model (NN PIM) to include the former VIVAT Non-life business. Prior to the formal completion thereof, NN Schade calculates the SCR for the merged entity using the NN PIM including a Transitional Capital Lock-In (TCLI). The TCLI amounts to EUR 116 million and resembles the impact of reporting the former VIVAT Non-life business on the Solvency II standard formula versus the NN PIM.

The 2021 figures for NN Schade are based on the PIM, including the abovementioned TCLI. Note that the comparative 2020 BSCR figures are determined by summing the PIM BSCR for NN Schade and the Standard Formula for BSCR for the former VIVAT Non-life entity.

Solvency Capital Requirement

In EUR thousand	2021	2020
Market risk	483,519	465,826
Counterparty default risk	16,007	19,763
Non-market risk	1,130,770	1,274,760
Diversification	-347,285	-319,408
Partial Internal Model BSCR	**1,283,011**	**1,440,941**
Transitional Capital Lock-In	180,702	0
Operational Risk	110,163	110,360
Loss absorbing Capacity of Deferred Taxes	-372,228	-365,572
Total SCR	**1,201,648**	**1,185,729**

The SCR increased slightly by EUR 15,919 thousand to EUR 1,201,648 thousand in 2021.

NN Schade's Solvency II ratio

The following table presents the solvency ratio of NN Schade at year-end 2021:

Solvency ratio

In EUR thousand	2021	2020
Eligible Own Funds (EOF)	1,704,062	1,475,062
Minimum Capital Requirement (MCR)	540,742	533,578
Solvency Capital Requirement (SCR)	1,201,648	1,185,729
Surplus	**502,414**	**289,333**
Ratio (%) (EOF/SCR)	142%	124%

The Solvency II ratio of NN Schade increased to 142% from 124% mainly due to the strong increase in the Own Funds.

Contract boundaries for individual disability contracts

In 2021, the DNB issued further guidance related to the treatment of contract boundaries for individual disability contracts. NN Schade intends to reflect the consequence of this guidance in its solvency calculations in the first half year of 2022, which is expected to have an impact of approximately -21%-points on the Solvency II ratio of NN Schade. Given current capital position, NN Schade is able to absorb this estimated impact.

Business and performance

A. Business and performance

Introduction

This chapter of the SFCR contains general information on NN Schade, a simplified organisational structure and NN Schade's financial performance over 2021.

A.1 Business

General

Reference is made to the section 'NN Group and NN Schade at a Glance' in the 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
Spaklerweg 4
1096 BA Amsterdam
The Netherlands

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

Mr. W. (Wim) Teeuwissen 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 2021 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 2021, 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 Annual Report of NN Schade for more information on the material lines of business of NN Schade.

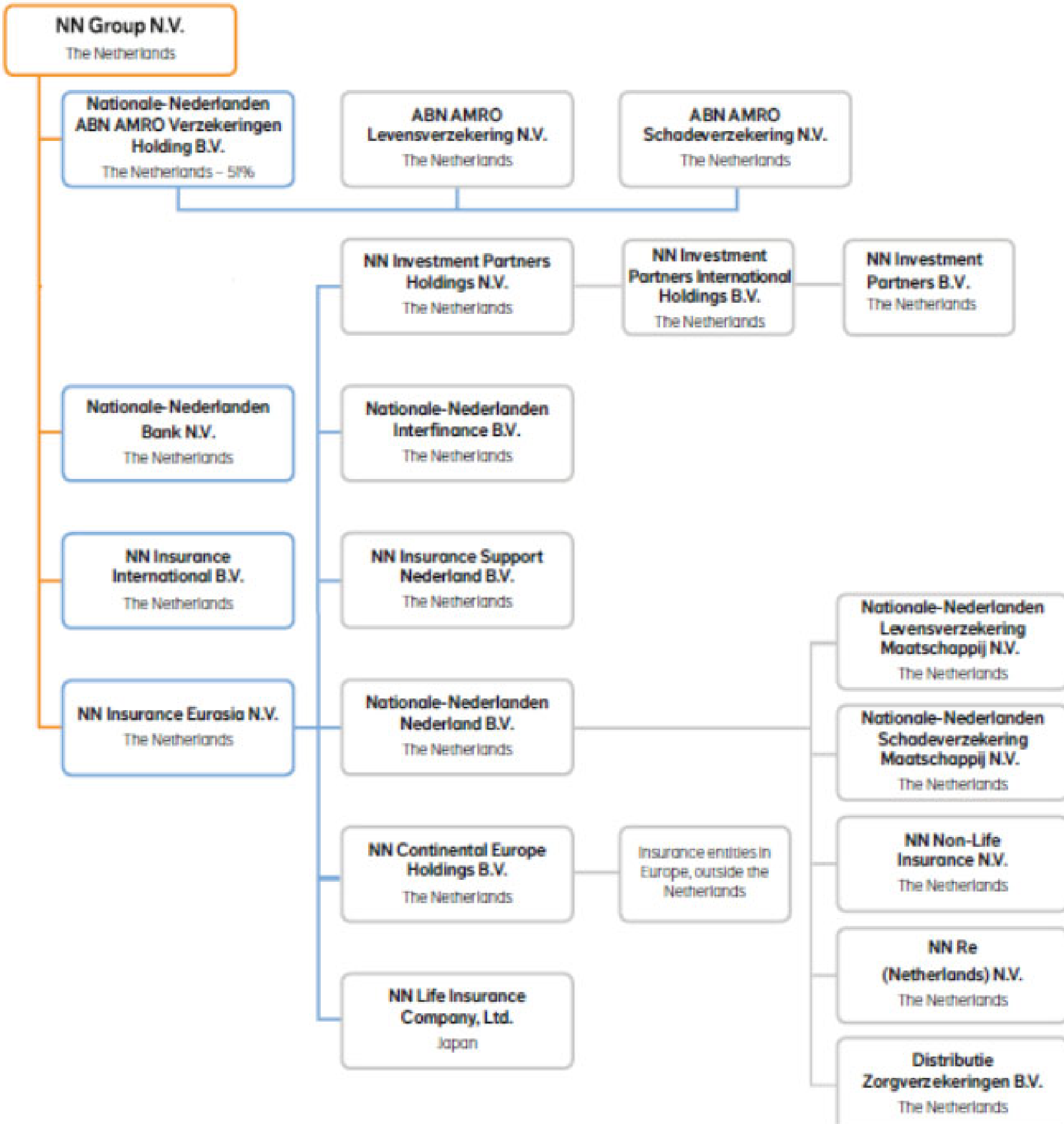
For information on any significant business events or other events that have occurred over the reporting period reference is made to the section 'Report of the Management Board – Financial strength' in the Annual Report of NN Schade and note 40 'Other events' in the 2021 Annual Report of NN Schade.

Reference is made to the section 'Corporate governance' in the 2021 Annual Report of NN Schade for information on the governance and organisational structure of NN Schade.

Simplified group structure

The simplified group structure as at 31 December 2021 is as follows:

Business and performance continued



In 2021 there were no changes in the legal structure 2021.

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 strength' in the 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' in the Appendix.

Further reference is made to Note 19 'Investment income' in the 2021 Annual Report 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 12 'Equity'- revaluation reserve and in the statement of comprehensive income in the 2021 Annual Report of NN Schade.

Information on investment in securitisations is included Note 5 'Available-for-sale investments' in the 2021 Annual Report 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.

Business and performance continued

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 2021 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 2021 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 structure of the committees, and explains the responsibilities, members and interdependencies of each committee. This chapter sets out governance and control framework effective in 2021.

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 41 'Risk management' in the 2021 Annual Report 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 their relevant committees.

MB committees

The Management Board of NN Schade has been entrusted with the day-to-day management of NN Schade and the overall strategic direction of NN Schade.

The Governance Manual 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 Management Board committees are the Risk Board, the Model Committee, and the Assets & Liabilities Committee. In addition, the following committees are in place: a MT Risk committee per Business Line, the Crisis Committee, Pricing Model Governance Board (MGB), Pricing and Underwriting committees, Steering Committee Reinsurance (SC HV), and the LDI 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 the DNB's fit and proper test. All the Solvency II key functions are able to carry out their duties objectively and free from undue influence, and do not simultaneously perform conflicting activities. They all have been given an appropriate standing in the organisation and can report relevant findings directly to the relevant Board(s).

Risk function

CRO

The Chief Risk Officer (CRO) of NN Schade is member of the NN Non-life Management Board and reports hierarchically to the NN Schade CEO and functionally to the NN Group CRO. 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. The CRO domain includes both the Risk Management Function and the Actuarial Function.

Risk Management Function

Responsibilities

The Head of Risk Management is the Solvency II Key Function Holder for the Risk Management Function and reports to the NN Schade CRO. Responsibilities of the Risk Management Function include:

- Setting, and monitoring compliance with, NN Schade's overall risk policies;
- Formulating the risk management strategy of NN Schade and ensuring that it is implemented throughout NN Schade;
- Supervising the operation of risk management and business control systems of NN Schade;
- Reporting of NN Schade's risks, as well as the processes and internal controls;
- Making risk management decisions with regards 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.
- Sharing best practices across NN Group
- Developing the Partial Internal Model of NN Schade

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 41 'Risk management' in the 2021 Annual Report of NN Schade.

System of governance continued

Remuneration
Remuneration is performed in line with the remuneration policies defined by NN Group. Reference is made to Note 24 'Staff expenses' as disclosed in the 2021 Annual Report 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: NN Group - Remuneration (nn-group.com).

Transactions with related parties
Reference is made to Note 38 'Related parties' and Note 39 'Key management personnel compensation' in the 2021 Annual Report of NN Schade for information about material transactions during the reporting period. Section B.7 in this SFCR contains more information on intra-group 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 39 'Key management personnel compensation' in the 2021 Annual Report of NN Schade.

Adequacy of system of governance
An 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 has been based, amongst others, on self-assessments by each Key Function Holder on its compliance with requirements and on its operational effectiveness, as well as on a self-assessment on the effectiveness of the NN Non-life System of Risk Management and Internal Control (challenged by the Risk Management and Compliance Key Function). Overall, whilst some improvement areas were identified with appropriate measures to address these, the NN Non-life Management Board concludes that NN Non-life's System of Governance is adequate and effective, supports its strategic objectives and operations and provides for sound and prudent management of the company.

Consistent use of risk management, internal control systems and reporting procedures
Reference is made to Note 41 'Risk management' in the 2021 Annual Report 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 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 applicable to the persons who manage NN Schade, reference is made to Note 41 'Risk management' in the 2021 Annual Report of NN Schade. Requirements concerning skills, knowledge and expertise applicable to people who have other key functions, are included in the respective job profiles.

Various NN Group policies and charters include provisions aiming to ensure that the people who effectively run NN Schade and the people fulfilling key functions are fit and proper. During recruitment all candidates must have the professional qualifications, knowledge and experience that are required for sound and prudent management (fit) and be of good repute and have integrity (proper). Where applicable the candidates must pass the DNB or AFM fit and proper test.

All people 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 41 'Risk management' in the 2021 Annual Report of NN Schade for:

- a description of the risk management system, which comprises of strategies, processes and reporting procedures,
- how NN Schade is able to effectively identify, assess, monitor, manage and report, on a continuous basis, and
- the risks to which NN Schade is or could be exposed on an individual and aggregated level.

In the same note, a description is included on how the risk management system including the risk management function are implemented and integrated into the organisational structure and decision-making processes of NN Schade.

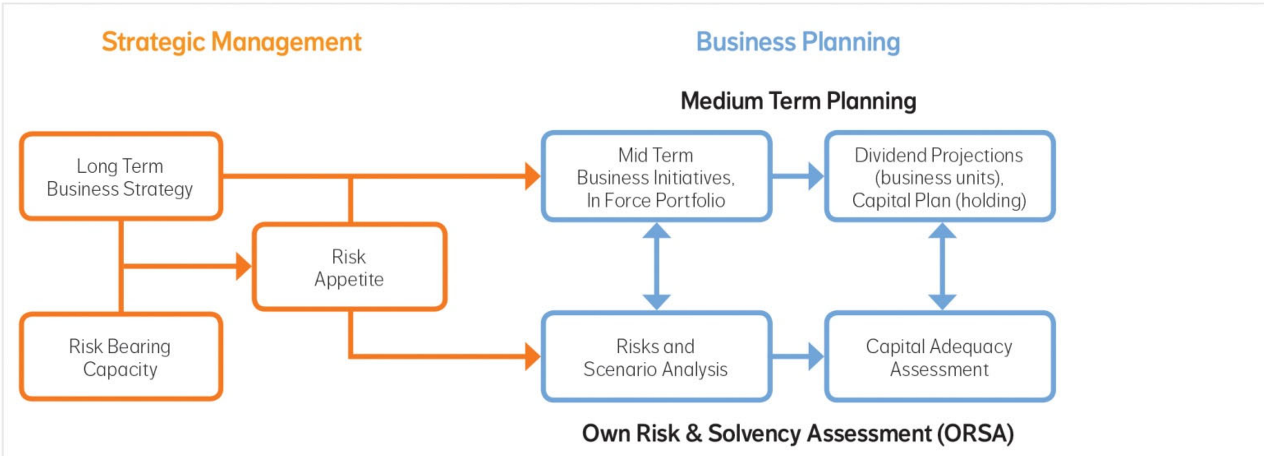
Own Risk and Solvency Assessment
Business strategy and objectives, key risk appetite statements, risk and capital management are aligned in the Own Risk and Solvency Assessment (ORSA) in synchronisation with the yearly medium term business plan. The ORSA report supports the Management Board in assessing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

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:

System of governance continued

- 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
- Is an integral part of business planning.

As such, the ORSA is linked to the strategic management process and related decision-making framework as illustrated below:



Regular frequency
NN Schade, in combination with NN Non-Life Insurance N.V., 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 analysis, including a multiyear view.

Stress testing examines the effect of exceptional but plausible scenarios on the capital position of NN Schade. Stress testing can also be initiated outside the 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 the solvency position of NN Schade considering the risks it holds.

Monitoring between regular ORSAs: possible ad-hoc ORSA
To the extent necessary, 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), risk metrics and management actions for identified material risks. Monitoring of ad-hoc ORSA triggers and risk metrics is performed as 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 and can result in changes in the determination of required capital.

Capital projections
The projection basis is 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.

System of governance continued

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 at all times. 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.

Note that 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 has outsourced its Model Validation Function to NN Group. NN Group's Model Validation Function aims to ensure that NN Schade's models are fit for their intended use. For this purpose, the Model Validation Function carries out validations of risk and valuation models in particular those related to Solvency II. Any changes to models that have an impact larger than certain pre-set materiality thresholds require approval from either the Group CRO, Group CFO or the NN Group Management Board.

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 life cycle: at initiation, prior to approval, when the model has been redeveloped or modified, and on a regular basis, based on a planning discussed and agreed with the Model Development departments. It is not only a verification of the mathematics and/or statistics of the model, but encompasses both a quantitative and qualitative assessment of the model. Accordingly, the validation process covers a mix of developmental evidence assessment, process verification and outcome analysis.

The validation cycle determines the maximum period between two model validations, which can be up to five years. This means that each model in scope will be independently validated at least once within the validation cycle. In general, the length of the validation cycle relates to the relative materiality of the models in scope. Model Validation can also start validating before the due date, for example following specific portfolio/market developments or regulatory changes. Materiality of a model is determined based on quantitative and qualitative criteria. Quantitative criteria relate to, amongst others, a percentage of Market Value of Liabilities/Assets, or Solvency Capital Requirement. Qualitative criteria cover model complexity, strategic importance and other factors. Depending on materiality of the model, as well as the severity of findings resulting from a model validation, models receive a Validation Opinion. Models with severe findings require remediation actions by management, such as further adjustments of the model.

Changes in the governance of NN Schade's Partial Internal Model

During 2021 no material changes to the governance of NN Schade's Partial Internal Model (PIM) were made.

B.4 The Internal control system

Reference is made to Note 41 'Risk management' of the 2021 Annual Report of NN Schade for a description of the implementation of the Internal control system.

B.5 Internal Audit Function

Reference is made to Note 41 'Risk management' of the 2021 Annual Report of NN Schade for a description of the implementation of the Internal Audit Function.

B.6 Actuarial Function

Reference is made to Note 41 'Risk management' of the 2021 Annual Report of NN Schade for a description of the implementation of the Actuarial Function.

System of governance continued

B.7 Outsourcing

External Outsourcing arrangements

NN Schade has outsourced part of its (IT) processes to external service providers. There are no significant provisions recognised for doubtful debts or individually significant bad debt expenses 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
- 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 the policyholder 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.

Following the acquisition of VIVAT Non-Life on 1 April 2020, a Transitional Service Agreement (TSA) is in place with related governance bodies to manage the migration from VIVAT Schade to NN Schade until completion.

Intra-group Outsourcing arrangements

In the normal course of business, NN Schade 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 recognised for doubtful debts or individually significant bad debt expenses on outstanding balances within NN Schade.

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 Personeel B.V. NN Schade is charged for its staff expenses by NN 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 Personeel B.V. Actual spending is charged to the NN Schade as per the contract with NN 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 certain derivatives. The sale of in-house asset manager NN IP to Goldman Sachs Group, expected to close in the first half year of 2022.
- Zicht B.V. and Volmachtkantoor Nederland B.V., act as mandated brokers for NN Schade
- Nationale-Nederlanden Bank N.V. is the servicing and originating partner for mortgage loans held by NN Schade
- Heinenoord Assuradeuren B.V., acquired in October 2021 by NN Group, is a holding company with entities that are mandated brokers or regular intermediaries for NN Schade.

For intra-group outsourcing arrangements, a written Intra-group Outsourcing 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 Annual Report of NN Schade and the NN Group website:
NN Group - Corporate Governance (nn-group.com) for other information regarding the system of governance of NN Schade and NN Group .

Risk profile

C. Risk profile

Introduction

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

Risk profile per risk category

Reference is made to Note 41 'Risk management' in the 2021 Annual Report 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 41 'Risk management' in the 2021 Annual Report of NN Schade.

C.2 Market risk

Market risk is disclosed in Note 41 'Risk management' in the 2021 Annual Report of NN Schade.

C.3 Counterparty risk (Credit risk)

Counterparty Default risk is disclosed in Note 41 'Risk management' in the 2021 Annual Report of NN Schade.

C.4 Liquidity risk

Liquidity risk is disclosed in Note 41 'Risk management' in the 2021 Annual Report of NN Schade.

C.5 Operational risk

Operational risk is disclosed in Note 41 'Risk management' in the 2021 Annual Report of NN Schade.

C.6 Other material risks

Strategic and emerging risks

Strategic risks are risks arising from making incorrect business decisions, implementing decisions poorly, or being unable to adapt to changes in the operating environment. Emerging risks are newly developing risks, or changing risks, that cannot yet be fully assessed or quantified but that could, in the future, affect the viability of NN Schade's strategy. Most of these risks have a high degree of uncertainty with regard to how they can impact us, or the size of the impact. Reference is made to the 2021 Annual Report of NN Schade, section 'Managing our risks' for any other information on any 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 41 'Risk management' in the 2021 Annual Report of NN Schade.

Concentration risks

NN Schade manages concentration risk with a limit structure. More information on the mitigation of several types of concentration risk is included in Note 41 'Risk management' in the 2021 Annual Report 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 specific assessment, called 'New Asset Class Assessment' (NACA) must be followed.

The NACA 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 NACA request does not describe a specific transaction, but is a proposal for the potential investment in an investment class. The NACA 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 provide advice on proposed or current investments.

Risk profile continued

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

- Asset Class Standard (NACA)
- Investment Management Policy
- Concentration Risk Standard
- ALM policy
- Interest Rate Risk Management Standard
- Liquidity Risk Reporting Standard
- Financial Regulations Standard
- Responsible Investment framework policy
- Investment Mandate Standard.

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

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

NN Investment Partners prepares a market view, proposes investment ideas based on market developments and Business Unit requirements and makes investment decisions within allocated limits/thresholds. NN Investment Partners executes the Performance Measurement Guidelines as prepared by the Chief Investment Officer. In August 2021, NN Group announced that it had reached an agreement to sell its asset management activities executed by NN Investment Partners (NNIP) to Goldman Sachs for total cash proceeds of EUR 1.7 billion. Closing of the transaction is subject to customary conditions, and is expected to take place in the first half of 2022.

Sensitivity analysis
Reference is made to Note 52 'Risk Management' in the 2021 Annual Report of NN Group for a description of the methods used, the assumptions made and the exposures to certain risk types.

Other material risks
Reference is made to the section 'Report of the Management Board' in the 2021 Annual Report of NN Schade for any other information on any other material risks if any.

Risk exposure from off-balance sheet positions and transfer of risk to special purpose vehicles
Reference is made to Note 41 'Risk management' in the 2021 Annual Report 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 2021, 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 41 'Risk management' in the 2021 Annual Report 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.

Covid-19 pandemic
NN Schade is constantly monitoring the developments and the (potential) impact on the company:

- A dedicated Covid-19 coordination team met regularly to monitor developments in different areas, discuss our response, and set into motion required actions. The Covid-19 coordination team has regular contact with internal and external stakeholders, such as with supervisors (DNB and AFM), senior management and employees, to communicate any changes to corporate policies, remedial actions required and regular progress reporting.
- Monitoring of financial markets: To make sure financial positions are monitored, and losses avoided or mitigated, several financial indicators related to volatility and liquidity of markets are monitored, for example interest rates, equity prices, bond spreads, etc.
- We applied stress testing and scenario analysis to assess impact of financial market developments on our solvency and liquidity positions. As part of scenario analysis, we analysed both the impact of a prolonged Covid-19 crisis when vaccine-resistant mutations arise, as well as scenarios where Covid-19 will become endemic, meaning the pandemic will not end with the virus disappearing, but that enough people will gain immunity protection from vaccination or natural infection such that there will be less transmission and much less Covid-19-related hospitalisation and death, even as the virus continues to circulate.
- Monitoring of impact on customers: Monitoring morbidity and mortality rates (customers passing away due to Covid-19), claim rates from customers getting sick by Covid-19 or longer disability where treatments are postponed, impact on property and casualty claims, lapse and pre-payment behaviour, and whether products still fit customer' needs.
- Monitoring of third parties and business partners: To ensure that outsourced services are delivered according to agreed service levels, and to ensure that our sales and support networks via tied agents and brokers remain healthy, and extra measures are taken as necessary.
- Monitoring business continuity and IT security: To make sure that customers can be serviced in a normal way using our digital channels, where necessary via accelerated digital initiatives, to ensure that our employees could work safely from home and to make sure financial market

Risk profile continued

operations and payments could continue as normally as possible, while potential IT (security) risks are mitigated.
NN Schade will continue to monitor further developments related to the Covid-19 pandemic and adjust our response accordingly. Reference is made to Note 41 'Risk Management' in the 2021 Annual Report for more details.

Contract Boundaries – Future Management Actions

In 2021, DNB issued further guidance related to the treatment of contract boundaries for individual disability contracts. NN Schade intends to reflect the consequence of this guidance in its solvency calculations in the first half year of 2022, hereby taking into account the effect of Future Management Actions (FMAs), as noted in article 23 of the Delegated Acts. The estimated impact is approximately -21%-points on the solvency ratio of NN Schade. Given the current capital position, NN Schade is able to absorb this estimated impact.

Valuation for Solvency purposes

D. Valuation for Solvency Purposes

Introduction

This chapter contains information on the valuation for solvency purposes of assets, insurance liabilities and other liabilities of NN Schade and explains the differences with the valuations in the NN Schade 2021 Annual accounts.

Reconciliation IFRS Balance sheet to Solvency II Balance sheet

As at 31 December 2021. In EUR thousand	IFRS	Presentation differences	Valuation differences	Solvency II
Assets				
Cash and cash equivalents	7,881	0	0	7,881
– Non-trading derivatives	61,145	2,803	0	63,948
Available-for-sale investments	6,280,075	56,207	-6,288	6,329,994
Loans and advances	2,232,349	4,394	76,191	2,312,934
Reinsurance contracts	278,705	0	-56,481	222,224
Property and equipment	7,236	0	0	7,236
Subsidiaries and associates	53,188	53	0	53,241
Intangible assets	101,268	0	-101,268	0
Deferred acquisition costs	62,747	0	-62,747	0
Other assets	232,933	-68,909	0	164,024
Total assets	**9,317,527**	**-5,452**	**-150,593**	**9,161,482**
Equity				
Shareholder's equity	1,563,910	0	-147,070	1,416,840
Undated subordinated loan	130,000	3,730	4,948	138,678
Total equity / Excess of assets over liabilities	**1,693,910**	**3,730**	**-142,122**	**1,555,518**
Liabilities				
Subordinated debt	161,797	53	-9,522	152,328
Other borrowed funds	0	0	0	0
Insurance contracts	6,911,576	0	51,367	6,962,943
Financial liabilities at fair value through profit or loss:				
– Non-trading derivatives	48,538	946	0	49,484
Deferred tax liabilities	130,694	0	-48,950	81,744
Other liabilities	371,012	-10,181	-1,366	359,465
Total liabilities	**7,623,617**	**-9,182**	**-8,471**	**7,605,964**
Total equity and liabilities	**9,317,527**	**-5,452**	**-150,593**	**9,161,482**

Reference is made to the 2021 Annual Report of NN Schade for more detailed information on the IFRS Balance sheet. Reference is also 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 41 'Risk management' in the 2021 Annual Report 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 28 'Fair value of financial assets and liabilities' in the 2021 Annual Report of NN Schade for a description of the bases, methods and main assumptions used for their valuation.

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 28 'Fair value of financial assets and liabilities' in the 2021 Annual Report 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 56,207 thousand as at 31 December 2021 are caused by presentation of accrued interest as part of the

Valuation for Solvency purposes continued

investments, instead of a separate presentation as accrual under IFRS. Solvency II requires accrued interest to be presented as part of the investments (dirty market value) and not separately as other assets as in the 2021 Annual Report 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 2021 Annual Report 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 76,191 thousand as at 31 December 2021.

Presentation differences of EUR 4,394 thousand as at 31 December 2021 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 2021 Annual Report of NN Schade (clean market value).

Reinsurance contracts

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

Property and Equipment

In the IFRS balance sheet, property in own use is reported at fair value. In the Solvency II balance sheet, property in own use is reported at market value. There are no significant valuation differences between IFRS and Solvency II for property in own use as fair value generally equals market value. In the IFRS balance sheet, equipment is reported at cost less depreciation. In the Solvency II balance sheet, equipment is reported at market value. There are no significant valuation differences between IFRS and Solvency II for equipment, as market value is generally not significantly different from depreciated cost.

Subsidiaries and associates (Holdings in related undertakings)

In the IFRS balance sheet, subsidiaries are recognised using the equity method of accounting and 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 quoted market price 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.

Deferred taxes

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

Reference is made to Note 27 'Taxation' in the 2021 Annual Report and Note 36 'Contingent liabilities and commitments – Tax liabilities' of NN Schade for more information on the origin of the recognition of deferred taxes.

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 68,909 thousand as at 31 December 2021 is mainly related to 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 2021 Annual Report of NN Schade (clean market value).

Changes in valuation bases

During 2021, 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.

Valuation for Solvency purposes continued

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 2021:

Value of technical provisions by Solvency II Business Line

As at 31 December 2021. In EUR thousand	Best Estimate Liabilities	Risk margin	Technical provisions
Technical provision per line of Business:			
1. Non-Life	2,207,684	84,197	2,291,881
2. Health similar to Non-Life	281,708	16,634	298,342
3. Health similar to Life	4,013,191	359,529	4,372,720
Total	**6,502,583**	**460,360**	**6,962,943**

Bases, methods and main assumptions used for solvency valuation

Technical Provisions are measured for Solvency II purposes as the sum of the BEL and 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 except the modelling of inflation for the Movir portfolio, where a Time Value of Options and Guarantees (TVOG) exists.

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.

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 of the (former) NN, Movir, Delta Lloyd and VIVAT portfolios, the contract boundaries are based on the specific policy conditions. The largest part

Valuation for Solvency purposes continued

of the portfolio is set at a one-year horizon, taking the 'en bloc' practices of those portfolios into account.

In 2021, the Dutch Central Bank (DNB) issued further guidance related to the treatment of contract boundaries for individual disability contracts. NN Schade intends to reflect the consequence of this guidance in the solvency calculations in the first half of 2022, which is expected to have an impact of - 21% points on the solvency ratio.

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 2021, the EIOPA and NN Schade curves were consistent.

Changes in assumptions

During 2021, best estimate assumptions were reviewed and updated where necessary. Assumption changes reflect movements in the financial markets, and recalibration of non-market assumptions.

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 Note 41 'Risk management' in the 2021 Annual Report of NN Schade.

Main differences between IFRS and Solvency II valuation of technical provisions

As at 31 December 2021. In EUR thousand	IFRS	Valuation differences	Solvency II
Technical provision per line of Business:			
1. Non-Life	2,615,343	-323,462	2,291,881
2. Health similar to Non-Life	345,687	-47,345	298,342
3. Health similar to Life	3,950,546	422,174	4,372,720
Total	**6,911,576**	**51,367**	**6,962,943**

Summary of main differences between IFRS and Solvency II as at 31 December 2021

At 31 December 2021 , 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 51,367 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, whereas the IFRS assumptions contain prudency
- 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 on technical provisions
- Transitional measures on interest rates
- Volatility adjustment
- Matching Adjustment

on:

Valuation for Solvency purposes continued

- 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 Volatility adjustment (VOLA) is of significant 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 2021 , the level of the VOLA for the Euro currency was 3 bps (31 December 2020: 7bps). The application of the VOLA resulted in a reduction of EUR 12,370 thousand in technical provisions, contributing EUR 9,179 thousand (after tax) to Basic own funds and Eligible Own Funds as at 31 December 2021.

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 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 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 impact of removing the VOLA from Own Funds decreased in 2021 compared to 2020.

D.3 Other liabilities

Subordinated Debt
In the IFRS balance sheet, subordinated debt reported at amortised cost. In the Solvency II balance sheet, subordinated debt is reported at market value, excluding an adjustment for the change in NN Schade's own credit risk after initial recognition. In Solvency II value, the change in the own credit risk after initiation is not taken into account. The Solvency II value of subordinated debt is calculated using discounted cash flows based on current interest rates and credit spreads at issued date.

Presentation differences include the different presentation of accrued interest. Solvency II requires accrued interest to be presented as part of the interest bearing liabilities (dirty market value) and not separately as other liabilities as in the 2021 Annual Report of NN Schade (clean market value). In addition to this presentation difference, the undated subordinated notes presented as equity under IFRS is presented as liability under Solvency II. Total presentation differences for subordinated debt amounted to EUR 53 thousand as at 31 December 2021.

Valuation differences between IFRS and Solvency II for Subordinated debt of EUR -9,522 thousand represent the difference between amortised cost and market value, excluding an own credit element.

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'- Deferred taxes). 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 48,950 thousand lower deferred tax liabilities are recognised in the Solvency II balance sheet as at 31 December 2021.

Other liabilities
In the IFRS balance sheet, other liabilities are reported at the notional amount. In the Solvency II balance sheet, other liabilities are reported at market value.

Valuation differences between IFRS and Solvency II for other liabilities of EUR -1,366 thousand represent the difference between IFRS valuation and Solvency II valuation for reinsurance payables.

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 2021 Annual Report of NN Schade (clean market value). Presentation differences amounted to EUR -10,181 thousand as at 31 December 2021.

Valuation for Solvency purposes continued

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 2021).

For more details on other provisions and contingent liabilities, reference is made to Note 36 'Contingent liabilities and commitments' in the 2021 Annual Report of NN Schade.

Leasing
Information on operating lease arrangements are recognised in Note 26 'Other operating expenses' and Note 36 'Contingent liabilities and commitments' in the 2021 Annual Report 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 32 'Liabilities by maturity' in the 2021 Annual Report of NN Schade. Uncertainties surrounding the amount or timing of the outflows of economic benefits is described in the Liquidity Risk paragraph in Note 41 'Risk management' in the 2021 Annual Report 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 2021
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 28 'Fair value of financial assets and liabilities' in the 2021 Annual Report 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 2021 Annual Report of NN Schade. The valuation methods used if the markets are inactive are described in Note 28 'Fair value of financial assets and liabilities'.

Estimation uncertainties
For the major sources of estimation uncertainty, reference is made to Note 41 'Risk management' in the 2021 Annual Report of NN Schade.

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 42 'Capital management' in the 2021 Annual Report 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, classified by tiers

Solvency II Basic Own Funds represent 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 2021 or as at 31 December 2021.

Impact of long term guarantees and transitional measures

The quantification of the impact of changing the volatility adjustment to zero, the 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.

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 42 'Capital management' in the 2021 Annual Report of NN Schade for an analysis of significant changes in Own Funds.

The principal loss-absorbency mechanism

During 2021, NN Schade had no principal loss-absorbency mechanism in place.

Reconciliation reserve

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

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

The reconciliation reserve is included in QRT S.23.01.01 'Own funds' in the Appendix to this report.

As at 31 December 2021 NN Schade has foreseeable dividends, distributions and charges due to the interest on the subordinated debt.

Capital management continued

Reconciliation IFRS equity to Own Funds

Reconciliation IFRS equity to Solvency II Basic Own Funds

In EUR thousand	2021	2020
IFRS Shareholder's Equity	1,563,910	1,477,529
Elimination of deferred acquisition costs and other intangible assets	-164,015	-174,819
Valuation differences on assets	13,422	3,260
Valuation differences on subordinated loan, liabilities and insurance and investment contracts	-45,427	-219,726
Deferred tax effects on valuation differences	48,950	96,578
Excess of assets over liabilities	**1,416,840**	**1,182,822**
Undated subordinated loan	138,678	141,775
Subordinated debt	152,328	154,248
Foreseeable dividends and distributions	-3,784	-3,783
Basic Own Funds	**1,704,062**	**1,475,062**

The differences between IFRS Shareholders' Equity in NN Schade's 2021 Annual accounts and Solvency II Basic Own Funds of NN Schade as at 31 December 2021 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

SCR

NN Schade uses the Partial Internal Model (PIM) to calculate capital requirements under Solvency II.

On 31 December 2020, NN Schade entered into a legal merger with VIVAT Schadeverzekeringen N.V. (VIVAT Non-life). As a result, VIVAT Non-life ceased to exist as a separate legal entity and NN Schade assumed all assets and liabilities of VIVAT Non-life under universal title of succession. NN Schade is in the process of expanding its Partial Internal Model (NN PIM) to include the former VIVAT Non-life business. Prior to the formal completion thereof, NN Schade calculates the SCR for the merged entity using the NN PIM including a Transitional Capital Lock-In (TCLI). The TCLI amounts to EUR 181 million and resembles the impact of reporting the former VIVAT Non-life business on the Solvency II standard formula versus the NN PIM.

.Solvency Capital Requirement

In EUR thousand	2021	2020
Market risk	483,519	465,826
Counterparty default risk	16,007	19,763
Non-market risk	1,130,770	1,274,760
Diversification	-347,285	-319,408
Partial Internal Model BSCR	**1,283,011**	**1,440,941**
Transitional Capital Lock-In	180,702	0
Operational Risk	110,163	110,360
Loss absorbing Capacity of Deferred Taxes	-372,228	-365,572
Total SCR	**1,201,648**	**1,185,729**

Reference is made to QRT S.25.02.21 in the Appendix and Note 41 'Risk management' in the 2021 Annual Report of NN Schade for further explanations by risk categories.

Capital management continued

NN Schade determined the SCR including:

- Loss-absorbing capacity of deferred taxes (LACDT). 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 and new business 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 LACDT 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 (LACDT 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 LACDT 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 '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 LACDT 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 LACDT 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 continued

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).

In this calculation the change in tax law, that was approved in December 2021, was included. This refers to the tax rate to increase from 25.0% to 25.8% in 2022.

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

- The amount of the risk margin in the technical provision
- Taxable return on capital after the shock, after recapitalisation to 105% SCR if applicable, net of expected dividends.
- Taxable part of investment spread in excess of interest accretion on liabilities and funding costs over their (expected average) remaining duration.
- Profits from estimated new business to a limited number of years
- Other taxable items
- Finally, a number of scenarios is run to apply increasing uncertainty in future years. The average of the LACDT of the scenarios is rounded to the nearest 5% bucket of the maximal LACDT

The net deferred tax asset is classified as Tier 3 capital. Tier 3 capital cannot exceed 15% of NN Schade's SCR. Further information on Tiering is included in Note 42 'Capital management' in the 2021 Annual Report of NN Schade.

Minimum Capital Requirement

In EUR thousand	2021	2020
Eligible Own Funds to cover MCR	1,659,882	1,427,529
of which Tier 1 unrestricted	1,413,056	1,179,039
of which Tier 1 restricted	138,678	141,775
of which Tier 2	108,148	106,715
MCR (or the sum of the MCR of the related undertakings)	**540,742**	**533,578**

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 Partial Internal Model used

Partial Internal Model vs Standard Formula

The considerations for using a Partial Internal Model are in particular:

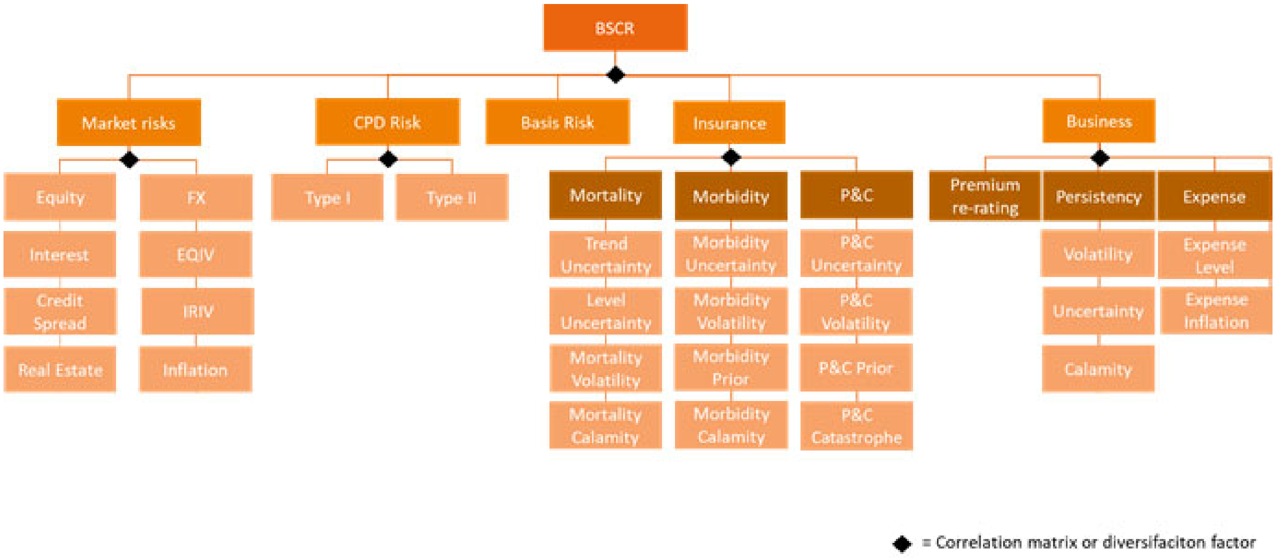
- An Partial Internal Model approach better reflects the specific assets and therefore the market risk in the portfolio of NN Schade e.g. property risk, sovereign and other credit spread risks. In addition the approach to the most significant non-market risks within NN Schade such as Disability/Morbidity 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 Partial 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 Partial Internal Model accounts for the volatility adjustment by means of an approach recognising the illiquidity of liabilities in the asset shocks. Reference is made to section D.2 (in paragraph 'Matching and volatility adjustment, transitional measures and transitional risk-free interest rate term structure') for further information on NN Schade's volatility adjustment.

Risks covered by the Partial 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

Capital management continued

Partial Internal Model, which leads to the Basic Solvency Capital requirement (BSCR):



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

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

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

- Interest Rate Risk:
  - The Partial Internal Model incorporates non-parallel shocks, to the curve as well instead of only two parallel shocks used in the Standard Formula
  - When interest rates are at low levels, the Partial Internal Model uses absolute shocks, while the Standard Formula uses relative shocks
  - The Partial Internal Model allows for negative interest rates, whereas the Standard Formula does not
  - In the Partial 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 Partial Internal Model interest rates converge 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 of the higher granularity in the Partial Internal Model and calibration to the equity portfolio of NN Group
- Credit Spread Risk:
  - Shocks in the Partial Internal Model apply to all fixed income assets, whereas the Standard Formula does not apply shocks to the bonds issued by EU member countries
  - In the Partial 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
  - In contrast to the Standard Formula, the Partial Internal Model recognises that exposure to volatility on credit spreads on our assets is mitigated by the illiquid nature of the liabilities through the Aligned Reference Portfolio (ARP) approach
- Real Estate Risk:
  - Shock applied in the Standard Formula is calibrated to historical prices observed in the UK property market, while the shocks in the Partial Internal Model are calibrated to historical prices observed in the property markets according to actual exposures of NN Schade
- 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 Partial Internal Model
- Diversification within the Market Risk module:
  - The Risk aggregation within the Partial Internal Model is performed on different level than in the Standard Formula. Partial Internal Model captures the dependency between risk drivers, while Standard Formula correlates losses

Capital management continued

- 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 necessary 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.

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.

The nature and appropriateness of the data used in the Partial 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 diversification effects arises from:

- For diversification within market risks, reference is made to the 'Market risk capital requirements' table in Note 41 'Risk management' of the 2021 Annual Report of NN Schade
- For other diversifications, reference is made to Note 41 'Risk management' of the 2021 Annual Report of NN Schade

The use of the Partial Internal Model

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

- The model provides a framework which is consistent across risk types, businesses and the key uses such as market valuation, capitalisation, product pricing, investments, monitoring of risk appetite and risk mitigation/transfer
- The model facilitates adequate risk management at all levels of the organisation and provides a framework to measure, monitor and manage risks versus NN Schade's risk appetite

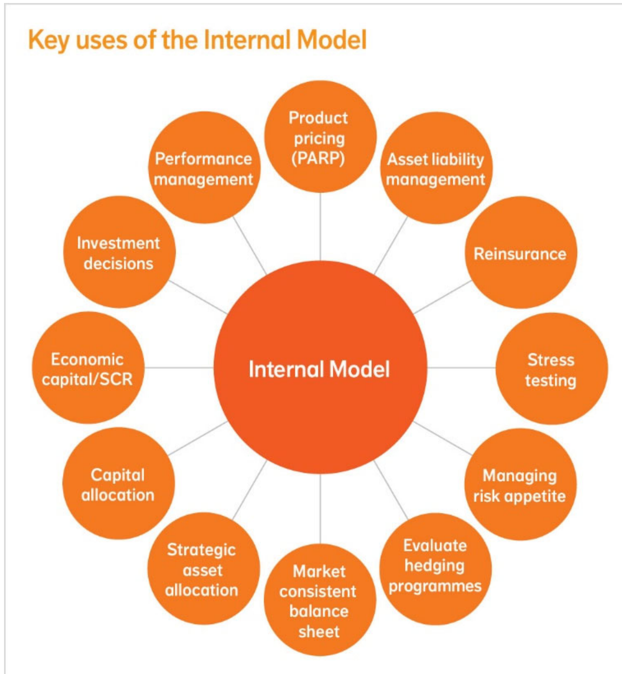
The model allows NN Schade to manage risk in many different ways, e.g.:

- Manage individual risk types at a much more granular approach, i.e. a stochastic (loss distribution) approach
- Manage volatility in a stochastic rather than deterministic approach
- Supports valuation, scenario- and stress analysis by running scenarios in a simple way using replicating portfolios
- The model allows NN Schade to proactively define its risk measurement and management approach rather than awaiting (generic) industry changes to the Standard Formula

The Partial 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, portfolio management and asset allocation.

Capital management continued

The following diagram provides an overview of the key uses of the Partial Internal Model.



The methods used in the Partial Internal Model for determining the probability distribution for risks and the Solvency Capital Requirement
For the market risk models the Normal Inverse Gaussian (NIG) distribution is mostly used. NIG distributions are a flexible set of distributions that allows modelling of fat-tailed and skewed distributions. For some market risk models where fewer data points are available, the Normal distribution is 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, goodness-of-fit tests and back testing are applied.

Reference is made to Note 42 'Capital management' in the 2021 Annual Report of NN Schade for more information on the risk measure and time period used in the Partial 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 42 'Capital management' in the 2021 Annual Report of NN Schade for any other material information regarding the capital management of NN Schade.

Appendix

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 number	Title	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.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 and 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 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 & equipment held for own use	R0060	7,236
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	6,454,815
Property (other than for own use)	R0080	
Holdings in related undertakings, including participations	R0090	53,241
Equities	R0100	307,750
Equities - listed	R0110	291,249
Equities - unlisted	R0120	16,501
Bonds	R0130	5,043,039
Government Bonds	R0140	1,913,211
Corporate Bonds	R0150	3,031,026
Structured notes	R0160	
Collateralised securities	R0170	98,802
Collective Investments Undertakings	R0180	986,085
Derivatives	R0190	63,948
Deposits other than cash equivalents	R0200	752
Other investments	R0210	
Assets held for index-linked and unit-linked contracts	R0220	
Loans and mortgages	R0230	2,304,457
Loans on policies	R0240	
Loans and mortgages to individuals	R0250	1,907,328
Other loans and mortgages	R0260	397,129
Reinsurance recoverables from:	R0270	222,224
Non-life and health similar to non-life	R0280	158,698
Non-life excluding health	R0290	158,832
Health similar to non-life	R0300	-134
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	63,526
Health similar to life	R0320	63,526
Life excluding health and index-linked and unit-linked	R0330	
Life index-linked and unit-linked	R0340	
Deposits to cedants	R0350	1,597
Insurance and intermediaries receivables	R0360	141,231
Reinsurance receivables	R0370	15,961
Receivables (trade, not insurance)	R0380	2,403
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	7,881
Any other assets, not elsewhere shown	R0420	3,676
Total assets	**R0500**	**9,161,482**

Appendix continued

		Solvency II value
		C0010
Liabilities		
Technical provisions – non-life	R0510	2,590,223
Technical provisions – non-life (excluding health)	R0520	2,291,881
Technical provisions calculated as a whole	R0530	
Best Estimate	R0540	2,207,684
Risk margin	R0550	84,197
Technical provisions - health (similar to non-life)	R0560	298,342
Technical provisions calculated as a whole	R0570	
Best Estimate	R0580	281,708
Risk margin	R0590	16,634
Technical provisions - life (excluding index-linked and unit-linked)	R0600	4,372,720
Technical provisions - health (similar to life)	R0610	4,372,720
Technical provisions calculated as a whole	R0620	
Best Estimate	R0630	4,013,190
Risk margin	R0640	359,529
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	6,183
Pension benefit obligations	R0760	
Deposits from reinsurers	R0770	14,232
Deferred tax liabilities	R0780	81,744
Derivatives	R0790	49,484
Debts owed to credit institutions	R0800	62,748
Financial liabilities other than debts owed to credit institutions	R0810	
Insurance & intermediaries payables	R0820	142,664
Reinsurance payables	R0830	54,499
Payables (trade, not insurance)	R0840	69,608
Subordinated liabilities	R0850	291,006
Subordinated liabilities not in Basic Own Funds	R0860	
Subordinated liabilities in Basic Own Funds	R0870	291,006
Any other liabilities, not elsewhere shown	R0880	9,533
Total liabilities	**R0900**	**7,744,642**
Excess of assets over liabilities	**R1000**	**1,416,840**

Appendix continued

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	Assistance	Miscellaneous financial loss
		C0020	C0040	C0050	C0060	C0070	C0080	C0100	C0110	C0120
Premiums written										
Gross - Direct Business	R0110	445,474	448,345	340,593	100,241	970,892	265,212	89,785	31,832	56,544
Gross - Proportional reinsurance accepted	R0120					828	750			
Gross - Non-proportional reinsurance accepted	R0130									
Reinsurers' share	R0140	765	3,481	-136	3,110	59,732	560	90,209		
Net	R0200	444,708	444,865	340,729	97,132	911,987	265,402	-425	31,832	56,544
Premiums earned										
Gross - Direct Business	R0210	447,369	451,243	345,945	100,750	987,968	267,927	89,993	33,541	57,835
Gross - Proportional reinsurance accepted	R0220		27			828	344			
Gross - Non-proportional reinsurance accepted	R0230									
Reinsurers' share	R0240	765	3,463	-136	3,194	56,796	560	90,016		
Net	R0300	446,604	447,806	346,080	97,557	931,999	267,711	-23	33,541	57,835
Claims incurred										
Gross - Direct Business	R0310	288,743	358,298	152,647	35,145	425,416	168,359	19,719	5,106	53,111
Gross - Proportional reinsurance accepted	R0320	-395	128		-10	1,651	-4,041			
Gross - Non-proportional reinsurance accepted	R0330									
Reinsurers' share	R0340	0	8,170	-229	-3,945	12,754	539	17,189		
Net	R0400	288,348	350,256	152,876	39,080	414,313	163,779	2,530	5,106	53,111
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**	**117,547**	**168,165**	**116,014**	**32,400**	**369,790**	**128,808**	**-2,191**	**10,420**	**8,858**
Other expenses	**R1200**									
Total expenses	**R1300**									

Appendix continued

		Line of Business for: accepted non-proportional reinsurance			Total
		Casualty	Marine, aviation, transport	Property	
		C0140	C0150	C0160	C0200
Premiums written					
Gross - Direct Business	R0110				2,748,918
Gross - Proportional reinsurance accepted	R0120				1,577
Gross - Non-proportional reinsurance accepted	R0130				
Reinsurers' share	R0140				157,721
Net	R0200				2,592,774
Premiums earned					
Gross - Direct Business	R0210				2,782,571
Gross - Proportional reinsurance accepted	R0220				1,198
Gross - Non-proportional reinsurance accepted	R0230				
Reinsurers' share	R0240				154,658
Net	R0300				2,629,111
Claims incurred					
Gross - Direct Business	R0310				1,506,544
Gross - Proportional reinsurance accepted	R0320				-2,668
Gross - Non-proportional reinsurance accepted	R0330	-997		-14	-1,010
Reinsurers' share	R0340				34,478
Net	R0400	-997		-14	1,468,388
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**	**-61**			**949,751**
Other expenses	**R1200**				
Total expenses	**R1300**				**949,751**

Appendix continued

		Line of Business for: life insurance obligations		Total
		Health insurance	Health reinsurance	
		C0210	C0270	C0300
Premiums written				
Gross	R1410	665,235		665,235
Reinsurers' share	R1420	20,664		20,664
Net	R1500	644,571		644,571
Premiums earned				
Gross	R1510	666,242		666,242
Reinsurers' share	R1520	20,664		20,664
Net	R1600	645,578		645,578
Claims incurred				
Gross	R1610	598,318	354	598,672
Reinsurers' share	R1620	3,893		3,893
Net	R1700	594,425	354	594,779
Changes in other technical provisions				
Gross	R1710			
Reinsurers' share	R1720			
Net	R1800			
Expenses incurred	**R1900**	**170,220**		**170,220**
Other expenses	**R2500**			
Total expenses	**R2600**			**170,220**

Appendix continued

S.12.01.02 Life and Health SLT Technical Provisions

		Health insurance (direct business)			Health reinsurance (reinsurance accepted)	Total (Health similar to life insurance)
			Contracts without options and guarantees	Contracts with options or guarantees		
		C0160	C0170	C0180	C0200	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		3,983,088	30,117	-15	4,013,190
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0080		63,526		0	63,526
Best estimate minus recoverables from reinsurance/SPV and Finite Re - total	R0090		3,919,562	30,117	-15	3,949,664
Risk Margin	R0100	359,529			0	359,529
Amount of the transitional on Technical Provisions						
Technical Provisions calculated as a whole	R0110					
Best estimate	R0120					
Risk margin	R0130					
Technical provisions - total	**R0200**	**4,372,734**			**-15**	**4,372,720**

Appendix continued

S.17.01.02 Non-life Technical Provisions

		Direct business and accepted proportional reinsurance								
		Income protection insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss
		C0030	C0050	C0060	C0070	C0080	C0090	C0110	C0120	C0130
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	R0050									
Technical provisions calculated as a sum of BE and RM										
Best estimate										
Premium provisions										
Gross	R0060	-14,640	15,898	10,939	-385	34,911	4,065	-3,786	-1,487	-507
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140	-248	-1,716	-573	-1,084	-22,949	-275	-3,012	-21	
Net Best Estimate of Premium Provisions	R0150	-14,393	17,614	11,512	698	57,860	4,339	-775	-1,467	-507
Claims provisions										
Gross	R0160	296,349	915,780	133,950	77,004	353,448	574,083	78,974	4,628	3,608
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240	113	26,912	3,660	7,575	43,691	27,363	78,593		
Net Best Estimate of Claims Provisions	R0250	296,236	888,868	130,289	69,428	309,758	546,720	381	4,628	3,608
Total Best estimate - gross	R0260	281,708	931,678	144,888	76,618	388,359	578,147	75,187	3,140	3,101
Total Best estimate - net	R0270	281,843	906,482	141,801	70,126	367,617	551,060	-393	3,161	3,101
Risk margin	R0280	16,634	23,353	9,199	4,376	22,721	18,956	630	494	4,274
Amount of the transitional on Technical Provisions										
Technical Provisions calculated as a whole	R0290									
Best estimate	R0300									
Risk margin	R0310									
Technical provisions - total										
Technical provisions - total	R0320	298,342	955,031	154,087	80,994	411,080	597,104	75,817	3,634	7,375
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	R0330	-134	25,196	3,087	6,492	20,742	27,088	75,581	-21	
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	R0340	298,476	929,834	151,000	74,502	390,339	570,016	237	3,654	7,375

Appendix continued

		accepted non-proportional reinsurance			Total Non-Life obligation
		Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance	
		C0150	C0160	C0170	C0180
Technical provisions calculated as a whole	R0010				
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole	R0050				
Technical provisions calculated as a sum of BE and RM					
Best estimate					
Premium provisions					
Gross	R0060	0	0	0	45,005
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140	0	0	0	-29,877
Net Best Estimate of Premium Provisions	R0150	0	0	0	74,882
Claims provisions					
Gross	R0160	5,958	15	591	2,444,387
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240	249	0	419	188,575
Net Best Estimate of Claims Provisions	R0250	5,709	15	173	2,255,812
Total Best estimate - gross	R0260	5,958	15	591	2,489,392
Total Best estimate - net	R0270	5,709	15	173	2,330,694
Risk margin	R0280	189	1	5	100,830
Amount of the transitional on Technical Provisions					
Technical Provisions calculated as a whole	R0290				
Best estimate	R0300				
Risk margin	R0310				
Technical provisions - total					
Technical provisions - total	R0320	6,147	16	596	2,590,223
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	R0330	249	0	419	158,698
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	R0340	5,898	16	177	2,431,525

Appendix continued

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

		Development 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											76,362
N-9	R0160	842,977	537,465	152,747	75,468	48,863	34,029	28,002	20,398	13,866	14,794	
N-8	R0170	791,848	573,610	155,218	77,778	43,525	30,281	29,325	22,563	17,614		
N-7	R0180	769,230	501,597	149,015	60,151	38,782	37,412	29,572	22,107			
N-6	R0190	749,619	466,088	120,999	61,112	40,718	37,475	28,301				
N-5	R0200	830,446	519,216	131,494	78,759	47,110	38,946					
N-4	R0210	749,434	450,260	124,758	62,763	42,992						
N-3	R0220	846,944	497,275	130,992	60,746							
N-2	R0230	718,392	497,129	147,524								
N-1	R0240	698,034	432,888									
N	R0250	622,013										

		In Current year	Sum of years (cumulative)
		C0170	C0180
Prior	R0100	76,362	76,362
N-9	R0160	14,794	1,768,610
N-8	R0170	17,614	1,741,762
N-7	R0180	22,107	1,607,867
N-6	R0190	28,301	1,504,313
N-5	R0200	38,946	1,645,971
N-4	R0210	42,992	1,430,207
N-3	R0220	60,746	1,535,957
N-2	R0230	147,524	1,363,045
N-1	R0240	432,888	1,130,923
N	R0250	622,013	622,013
Total	**R0260**	**1,504,288**	**14,427,030**

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

		Development 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											226,372
N-9	R0160					151,725	106,479	113,059	81,652	56,443	45,501	
N-8	R0170				200,964	144,856	125,359	87,733	83,355	75,004		
N-7	R0180			274,504	214,415	183,221	141,194	139,630	84,873			
N-6	R0190		395,869	255,417	200,916	135,469	100,438	92,170				
N-5	R0200	782,822	408,615	290,281	174,879	102,692	116,512					
N-4	R0210	795,334	423,210	255,430	186,469	149,725						
N-3	R0220	821,384	409,368	261,345	232,981							
N-2	R0230	880,860	389,178	257,870								
N-1	R0240	880,411	372,522									
N	R0250	794,799										

		Year end (discounted data)
		C0360
Prior	R0100	225,568
N-9	R0160	45,347
N-8	R0170	74,755
N-7	R0180	84,604
N-6	R0190	91,875
N-5	R0200	116,131
N-4	R0210	149,319
N-3	R0220	232,290
N-2	R0230	257,248
N-1	R0240	372,033
N	R0250	795,220
Total	**R0260**	**2,444,387**

S.22.01.21 Impact of long term guarantees and transitional measures

		Amount with LTG measures and transitionals	Impact of transitional on technical provisions	Impact of transitional on interest rate	Impact of volatility adjustment set to zero	Impact of matching adjustment set to zero
		C0010	C0030	C0050	C0070	C0090
Technical provisions	R0010	6,962,943			12,370	
Basic own funds	R0020	1,704,062			-9,179	
Eligible own funds to meet SCR	R0050	1,704,062			-9,179	
SCR	R0090	1,201,648			476,965	
Eligible own funds to meet MCR	R0100	1,659,882			8,961	
Minimum Capital Requirement	R0110	540,742			90,696	

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

Appendix continued

S.23.01.01 Own Funds

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35						
Ordinary share capital (gross of own shares)	R0010	6,807	6,807			
Share premium account related to ordinary share capital	R0030	345,834	345,834			
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040					
Subordinated mutual member accounts	R0050					
Surplus funds	R0070					
Preference shares	R0090					
Share premium account related to preference shares	R0110					
Reconciliation reserve	R0130	1,060,416	1,060,416			
Subordinated liabilities	R0140	291,006		138,678	152,328	
An amount equal to the value of net deferred tax assets	R0160					
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180					
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds						
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220					
Deductions						
Deductions for participations in financial and credit institutions	R0230					
Total basic own funds after deductions	**R0290**	**1,704,062**	**1,413,056**	**138,678**	**152,328**	
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300					
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310					
Unpaid and uncalled preference shares callable on demand	R0320					
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330					
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340					
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350					
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360					
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370					
Other ancillary own funds	R0390					
Total ancillary own funds	**R0400**					
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	1,704,062	1,413,056	138,678	152,328	
Total available own funds to meet the MCR	R0510	1,704,062	1,413,056	138,678	152,328	
Total eligible own funds to meet the SCR	R0540	1,704,062	1,413,056	138,678	152,328	
Total eligible own funds to meet the MCR	R0550	1,659,882	1,413,056	138,678	108,148	
SCR	**R0580**	**1,201,648**				
MCR	**R0600**	**540,742**				
Ratio of Eligible own funds to SCR	**R0620**	**1.42**				
Ratio of Eligible own funds to MCR	**R0640**	**3.07**				

Reconciliation reserve

		C0060
Reconciliation reserve		
Excess of assets over liabilities	R0700	1,416,840
Own shares (held directly and indirectly)	R0710	
Foreseeable dividends, distributions and charges	R0720	3,783
Other basic own fund items	R0730	352,640
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	
Reconciliation reserve	R0760	1,060,416
Expected profits		
Expected profits included in future premiums (EPIFP) - Life business	R0770	100,609
Expected profits included in future premiums (EPIFP) - Non- life business	R0780	107,287
Total Expected profits included in future premiums (EPIFP)	**R0790**	**207,896**

Appendix continued

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
1001	Total capital requirement for market risk	483,519	483,519		
1003	Total capital requirement for counterparty default risk	16,007	16,007		
1004	Overall Insurance Risk	1,078,176	1,078,176		
1005	Overall Business Risk	236,420	236,420		
1006	Operational risk	110,163	110,163		
1015	Transitional Capital Lock-In	180,702	180,702		
9	Loss absorbing capacity for deferred taxes if not modelled within components	-372,228	-372,228		

Calculation of Solvency Capital Requirement		**C0100**
Total undiversified components	R0110	1,732,759
Diversification	R0060	-531,111
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	
Solvency capital requirement excluding capital add-on	R0200	1,201,648
Capital add-ons already set	R0210	
Solvency capital requirement	R0220	1,201,648
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	
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	

Approach to tax rate		**Yes/No** **C0109**
Approach based on average tax rate	R0590	No

Calculation of the adjustment for the loss-absorbing capacity of deferred taxes		**LACDT** **C0130**
LACDT	R0640	-372,228
LACDT justified by reversion of deferred tax liabilities	R0650	-81,744
LACDT justified by reference to probable future taxable economic profit	R0660	-290,484
LACDT justified by carry back, current year	R0670	0
LACDT justified by carry back, future years	R0680	0
Maximum LACDT	R0690	-372,228

Appendix continued

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

		C0010
MCRNL Result	R0010	456,948

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
		C0020	C0030
Medical expense insurance and proportional reinsurance	R0020		
Income protection insurance and proportional reinsurance	R0030	281,843	444,708
Workers' compensation insurance and proportional reinsurance	R0040		
Motor vehicle liability insurance and proportional reinsurance	R0050	906,482	444,865
Other motor insurance and proportional reinsurance	R0060	141,801	340,729
Marine, aviation and transport insurance and proportional reinsurance	R0070	70,126	97,132
Fire and other damage to property insurance and proportional reinsurance	R0080	367,617	911,987
General liability insurance and proportional reinsurance	R0090	551,060	265,402
Credit and suretyship insurance and proportional reinsurance	R0100		
Legal expenses insurance and proportional reinsurance	R0110		
Assistance and proportional reinsurance	R0120	3,161	31,832
Miscellaneous financial loss insurance and proportional reinsurance	R0130	3,101	56,544
Non-proportional health reinsurance	R0140		
Non-proportional casualty reinsurance	R0150	5,709	
Non-proportional marine, aviation and transport reinsurance	R0160	15	
Non-proportional property reinsurance	R0170	173	

		C0040
MCRL Result	R0200	138,379

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
		C0050	C0060
Obligations with profit participation - guaranteed benefits	R0210		
Obligations with profit participation - future discretionary benefits	R0220		
Index-linked and unit-linked insurance obligations	R0230		
Other life (re)insurance and health (re)insurance obligations	R0240	3,949,664	
Total capital at risk for all life (re)insurance obligations	**R0250**		**79,194,000**

		C0070
Linear MCR	R0300	595,327
SCR	R0310	1,201,648
MCR cap	R0320	540,742
MCR floor	R0330	300,412
Combined MCR	R0340	540,742
Absolute floor of the MCR	R0350	3,700
		C0070
Minimum Capital Requirement	R0400	540,742

Contact and legal information

Contact us

Nationale-Nederlanden Schadeverzekering Maatschappij N.V.
Prinses Beatrixlaan 35
2595 AK The Hague

P.O. Box 90464, 2509 LL The Hague
The Netherlands
Internet: www.nn.nl
Commercial register, no. 27023707

Nationale-Nederlanden Schadeverzekering Maatschappij N.V. is part of NN Group N.V.

Disclaimer

Small differences are possible in the tables due to rounding. Certain of the statements in this 2021 Solvency and Financial Condition Report are not historical facts, including, without limitation, certain statements made of future expectations and other forward-looking statements that are based on management's current views and assumptions and involve known and unknown risks and uncertainties that could cause actual results, performance or events to differ materially from those expressed or implied in such statements. Actual results, performance or events may differ materially from those in such statements due to, without limitation: (1) changes in general economic conditions, in particular economic conditions in NN Schade's core markets, (2) changes in performance of financial markets, including developing markets, (3) consequences of a potential (partial) breakup of the euro or European Union countries leaving the European Union, (4) changes in the availability of, and costs associated with, sources of liquidity as well as conditions in the credit markets generally, (5) the frequency and severity of insured loss events, (6) changes affecting mortality and morbidity levels and trends, (7) changes affecting persistency levels, (8) changes affecting interest rate levels, (9) changes affecting currency exchange rates, (10) changes in investor, customer and policyholder behaviour, (11) changes in general competitive factors, (12) changes in laws and regulations and the interpretation and application thereof, (13) changes in the policies and actions of governments and/or regulatory authorities, (14) conclusions with regard to accounting assumptions and methodologies, (15) changes in ownership that could affect the future availability to NN Schade of net operating loss, net capital and built-in loss carry forwards, (16) changes in credit and financial strength ratings, (17) NN Schade's ability to achieve projected operational synergies, (18) catastrophes and terrorist-related events, (19) adverse developments in legal and other proceedings and (20) the other risks and uncertainties detailed in the Risk management section and/or contained in recent public disclosures made by NN Group and/or related to NN Group.

Any forward-looking statements made by or on behalf of NN Schade in this Solvency and Financial Condition Report speak only as of the date they are made, and, NN Schade assumes no obligation to publicly update or revise any forward-looking statements, whether as a result of new information or for any other reason. This document does not constitute an offer to sell, or a solicitation of an offer to buy, any securities.