SOLVENCY & FINANCIAL CONDITION REPORT FOR THE YEAR ENDED 31 DECEMBER 2020

ONE LIFE

30 years

THE ONELIFE COMPANY S.A.

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EXECUTIVE SUMMARY

The **OneLife Group (the Group or OneLife)** is composed of **The OneLife Holding S.à r.l. (the Parent Company)** and its subsidiary, The OneLife Company S.A. (the Company). It is an insurance group whose sole and only insurance entity as of 31 December 2020 is **The OneLife Company S.A.**, an insurance company licenced in Luxembourg.

This is the Fifth **Solvency & Financial Condition Report (SFCR)** provided by the Company under the Delegated Regulation (UE) 2015/35 from the European Commission dated 10 October 2014, completing the European Parliament and Council Directive on the business of Insurance and Reinsurance (Solvency II). The current RSR covers the period from 1 January 2020 until 31 December 2020 (the **Reporting Period**).

When applicable, a summary of material changes since last SFCR issued is included in the current report.

The figures included in the current SFCR are extracted from the Company's audited annual accounts for the year ended 31 December 2020.

The purpose of the SFCR is to satisfy the reporting requirement to the **Commissariat aux Assurances (CAA or Regulator)** under the EU wide regulatory regime for insurance companies, known as Solvency II. This regime requires reporting and disclosure arrangements to be put in place by insurers and some of that is required to be public and published on the Company's public website as the current SFCR while another document required is purely issued to the CAA (referring to a specific apart confidential report-**Regular Supervisor Report – RSR**). The elements of the disclosure relate to business performance, governance, risk profile, solvency and capital management. The ultimate Administrative Body that has the responsibility for all these matters is the **Company's Board of Directors (BoD)** with the support of various governance and control functions that it has put in place to monitor and manage the business.

In a letter dated 14 December 2016, the Regulator has exempted OneLife from Group reporting for Solvency purposes. Accordingly, the sole entity having to produce such report is the Company and our report is produced considering that entity on a stand-alone basis.

With regards to the business and performance, profits have been generated by the core insurance activities in conjunction with strict cost controls and ad-hoc measures to cover the decrease of the markets resulting of the Covid shock in the first semester 2020. It resulted in a profit in 2020 of 5.3 M EUR (2019: 1.8 M EUR).

With regards to the system of governance, the Company assesses its system of governance as adequate taking into account the nature, scale and complexity of the risks inherent in its business. The different elements of the risk profile are assessed with a solid risk management methodology that requires intervention of all parties of the Company in order to ensure a complete picture including under simulated stress scenarios.

The Company exclusively applies the Standard Formula to determine its **Solvency Capital Requirements (SCR)**, without using simplified calculations and without using undertaking-specific parameters and has described the valuation methods used in section 5.

As at 31 December 2020, the Group's sole reporting entity, The OneLife Company S.A., post-dividend solvency II ratio is 137 % (2019 - 139%)

The tiering of basic own funds allows for the following split:

	2020	2019
Tier 1 Unrestricted	96.4 %	96.1 %
Tier 1 Restricted	3.6 %	3.9 %
Tier 2	N/A	N/A

SCR of the Company are concentrated on Market risk (equity, spread and currency risk) and on life underwriting risk (lapse risk, collection EURO Funds Versus Unit linked and expense risk).

Finally, the Company complied with its SCR and **Minimum Capital Requirement (MCR)** throughout the Reporting Period and the Company does not foresee a risk of non-compliance with its SCR or MCR during its business planning horizon.

Significant business or other events

Since 26 November 2019, OneLife is owned by APICIL Prévoyance and by APICIL Epargne S.A. (a company incorporated in France) which is entirely owned by APICIL Prévoyance.

On 30 December 2019, the Parent Company received from APICIL Epargne S.A. all the shares of **APICIL Life S.A.** ("APICIL Life"), a life insurance company incorporated in the Grand-Duchy of Luxembourg under Luxembourg law as a Société Anonyme and registered with the Luxembourg Trade and Companies Register under Number B 160.699. These shares were brought as a contribution in kind for a capital increase at the level of the Parent Company.

On 30 December 2019, the Company and APICIL Life merged through the Company absorbing APICIL Life with effective accounting date as of 1 January 2019.

In 2019, the Company has established a branch under registration number 878 395 169 R.C.S. Paris which is located in 51 Rue de Londres, 75008 Paris (France). Such branch is managing the business previously managed by APICIL Life's branch in Paris.

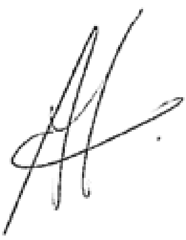
In 2020, the Covid-19 crisis had a significant impact on our operations and performance. The operational aspects were adequately managed and are still under control as of the date of this report. In parallel enhanced financial monitoring has been put in place thorough 2020 in terms of profitability, liquidity and solvency to assess and cover the financial impacts of the Covid 19 crisis.

Business continuity was maintained throughout the year and was put in place quickly following the outbreak of the pandemic in the first quarter of 2020. Members of OneLife were able to work from home to maintain business activities despite some slowness of IT systems in the first months. Improvements were introduced to increase capacity, for example of the bandwidth, and to implement digital solutions to facilitate communication between colleagues as they worked on a remote basis. OneLife teams managed to stay close to its partners and clients during the initial months of lockdown and subsequently when more staff returned to the office. We communicated on a regular basis to reassure our distributors and their clients that OneLife was open for business and that there was no loss of operations despite the challenging environment. Webinars and digital events were put in place to stay in close touch with our partners and OneLife continued to roll out its project roadmap with the delivery of a number of new service initiatives such as the successful migration to the new custodian bank, CACEIS, as well as daily valuation on SIF and IDFs with a number of banking partners. The new premium income performance across OneLife core markets was therefore satisfactory given the considerable challenges faced during the year.

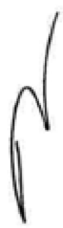
In the course of 2020, the Company conducted also alongside the Apicil Group a revision of its 4-year strategic plan (Horizon 24 – H24). This project is expected to be approved by the Board of Directors in Q1 2021 and will guide the Company in its future development.

Since 31 December 2020, there were no significant business or other events that occurred during the period until reporting that had a material impact on the Company or that could affect the reported figures or comments covered by this report.

Luxembourg, 6 April 2021



Antonio CORPAS
Chief Executive Officer



Philippe BARRET
Chairman of the Board of Directors

1. INTRODUCTION

1.1 - List of abbreviations & used terms

AML/CFT:	Anti-Money Laundering / Combat against Financing Terrorism
APICIL Epargne	APICIL Epargne S.A. (Société de droit français)
APICIL Life	APICIL Life S.A. (Société d'assurance de droit luxembourgeois)
APICIL Prévoyance	APICIL Prévoyance (Institution de Prévoyance de droit français)
ARCC:	Audit, Risk and Compliance Committee
BEL:	Best Estimate Liability
BSCR:	Basic Solvency Capital Requirement
Board or BoD:	Refers to The OneLife Company S.A. Board of Directors unless specified otherwise
Company:	The OneLife Company S.A. (Société d'assurance de droit luxembourgeois)
CAA:	Commissariat aux Assurances – Regulator of insurance companies in Luxembourg
CAC:	Client Acceptance Committee
CEO:	Chief Executive Officer- Delegate to the Daily Management
CF.	Control Function
DF or Dedicated Funds:	Unit-linked life insurance policies, capital redemption bonds and/or pension plans linked to an individual investment fund whose assets are managed according to the investment strategy selected by the Policyholder(s).
ERM:	Enterprise Risk Management
Exco	Executive Committee
FTE	Full Time Equivalent – referring to employees statistics
GDPR:	General Data Protection Regulation
Group	Refers to The OneLife Group composed of The OneLife Holding S.à r.l. and its subsidiary, The OneLife Company S.A.
HNWI:	High Net Worth Individuals
HR:	Human Resources department
HRRC:	Human Resources and Remuneration Committee
Iberia:	Iberian Peninsula composed of Spain & Portugal
IC:	Investment Committee
ICA:	In Collective Bargaining Agreement
MBC	Monitoring Branch Committee
MCR:	Minimum Capital Requirement

Merger	The merger between APICIL Life S.A. and the Company that was ratified on 30 December 2019 with effective accounting date 1 January 2019
MLRO:	Money Laundering Reporting Officer
NGC	Nomination & Governance Committee
NRGC	Nomination, Remuneration & Governance Committee
OAC	Outsourcing Activity Committee
OLC:	The OneLife Company
OLH:	The OneLife Holding S.à r.l.
OneLife	Also referred to as the Group
OPCOM	Operational Committee
ORSA:	Own Risk and Solvency Assessment
Parent Company	The OneLife Holding S.à r.l.
PSC	Products & Steering Committee
PVFP:	Present Value of Future Profits
QRT:	Quantitative Reporting Template
RCC	Risk & Control Committee
RED:	Risk Event Data
Regulator:	Refer to CAA
REM:	Risk Exposure Monitoring
RM:	Risk Margin
Reporting Period	The period from 1 January 2020 until 31 December 2020
RSR:	Regular Supervisory Report (addressed to the Regulator once approved by the BoD)
SCR:	Solvency Capital Requirement
SFCR	Solvency and Financial Condition Report (for publication on the Company's website)
SGAPS	Société de Groupe Assurantiel de Protection Sociale (France)
SLA:	Service Level Agreement
SMIRCo	Système de Management Intégré des Risques Communautaires
SMP:	Senior Management Position
T&L:	Tax & Legal Department
ToR:	Terms of Reference
UK:	United Kingdom

1.2 - Scope and corporate structure

This SFCR is prepared in accordance with requirements derived from the **Regulation (EU) N° 1094/2010 of the European Parliament and of the Council** (hereafter EIOPA Regulation) in connection with reporting on Solvency & Conditions Reports to the CAA for the regulated Company, The OneLife Company S.A. In accordance with the requirement of the Directive 2009/138/EC "Solvency II Directive", all the insurance and reinsurance undertakings must provide some information to the supervisory authorities in the RSR and must publicly disclose some information in the SFCR. All undertakings have to disclose on an annual basis, a report on their solvency and financial condition in which qualitative and quantitative information on business, performance, system of governance, risk profile, valuation for solvency purposes and capital management should be provided or described.

The Company is a life insurance company incorporated in the Grand Duchy of Luxembourg under Luxembourg law as a Société Anonyme on 26 June 1990 and registered with the Luxembourg Trade and Companies Register under number B 34402. This report is based on the Company's audited financial statements for the years ended 31 December 2020. The comparative figures presented for the year ended 31 December 2019 are also audited.

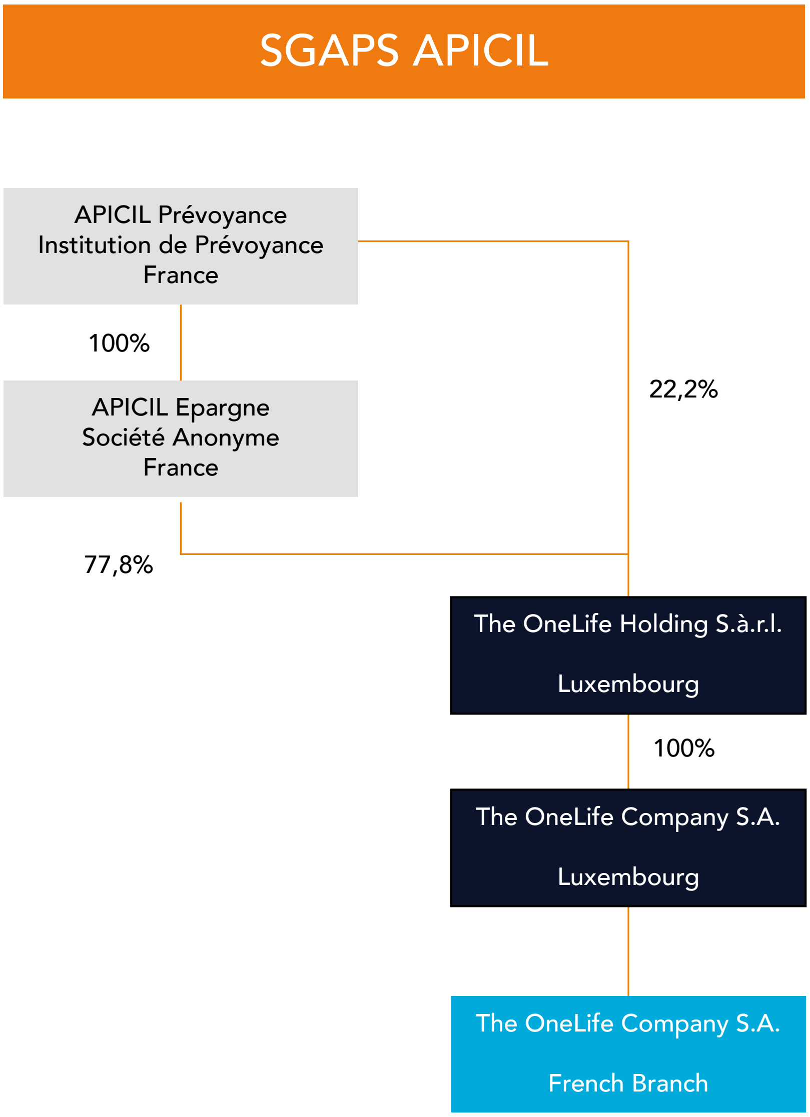
The Company is authorised by the CAA to provide life insurances, annuities, pensions and retirement benefits, and reinsurance operations or business of similar nature, and to conduct investment and real estate activity relating to the principal objective. The Company sources and administers its business through its head office in Luxembourg and through distribution partnerships in Luxembourg and other EU countries as well as via its branch in France.

During the reporting period, there were no significant changes occurred to the Company's organisation, business and structure compared to 2019.

The 100% shareholder and parent of the Company is The OneLife Holding S.à r.l. which is incorporated in Luxembourg.

Since 31 December 2019, the Company's accounts are consolidated for APICIL Group within the combined accounts at the level of Société de Groupe Assurantiel de Protection Sociale (France – "SGAPS"). The consolidated accounts and the consolidated Management reports are available at the address of that entity at 38, Rue François Peissel, 69300 Caluire et Cuire (France).

The structure of the Group as of 31 December 2020 and as of the date of this report is as follows:



In 2016, the Regulator exempted OneLife from Group reporting for Solvency purposes with effective date on 1 October 2016. Accordingly, the sole Group entity having to produce these reports is The OneLife Company S.A. and our SFCR and RSR reports are produced considering that entity on a stand-alone basis.

2. BUSINESS AND PERFORMANCE

2.1 - Business - Identification and appointments

This report relates to The OneLife Company S.A., an insurance company located and licenced in Luxembourg.

The Company is regulated by:

Commissariat aux Assurances
7, boulevard Joseph II
L-1840 Luxembourg
GD de Luxembourg
Telephone : (+352) 22 66 11 - 1
Fax : (+352)22 69 10
www.caa.lu

The Company's registered address is at

38 Parc d'Activités de Capellen
L-8308 Capellen
GD de Luxembourg
Telephone : (+352) 45 67 301
www.onelife.eu.com

The external auditor of the Company is:

Deloitte Audit, Société à Responsabilité Limitée
20 Boulevard de Kockelscheuer
L-1821 Luxembourg
GD de Luxembourg
Telephone : (+352) 45 14 51
www.deloitte.lu

Since 2 January 2019 and as of the date of this report, the Board of Directors is composed of 4 Non-Executive Directors:

Mr. Philippe Barret	Director and Chairman of the Board of Directors
Mr. Renaud Célié	Director
Mr. Alain Esquirol	Director
Mr. Michel Wolter	Director (Independent)

As of the date of this report, Mr. Antonio Corpas is the Company's Chief Executive Officer, legal representative, in charge of daily management and Authorized Manager towards the Regulator (*Dirigeant Agréé*). He was appointed on 18 April 2018. His mandate was renewed on 12 April 2019 (with effect as of 3 May 2019).

As of 31 December 2020 and as of the date of this report, the legal representative of the branch in France is Mr. Thierry Jouseau (*Mandataire Général*). He was appointed on 6 June 2019.

Whenever applicable, the figures presented in this report are derived from Audited Financial Statements for the years ended 31 December 2020 and 2019, which have been prepared in accordance with the Luxembourg law of 8 December 1994 on the accounts of insurance and reinsurance undertakings, as amended (the "Law") and in compliance with the generally accepted accounting policies for the insurance and reinsurance industry in the Grand Duchy of Luxembourg. The accounting policies and the valuation rules are determined and applied by the Board of Directors.

The following significant general rules have been applied:

- the Company is on a going concern basis;
- the valuation methods are consistent from one financial year to the other, except where otherwise stated in the Annual Accounts;
- the prudence principle is followed;
- only realised profits are recognised, with the exception of life insurance business where the risk is borne by the policyholder;
- all foreseeable risks and potential losses which arise during the course of the financial year are taken into account;
- assets and liabilities are valued item by item.

The Annual Accounts cover the yearly period from 1 January until 31 December.

All amounts in this report are labelled in Euro (EUR), if not otherwise stated.

2.2 - Business – Key figures

In terms of financial performance, the Company reported a profit of EUR 5.3 million in 2020 and EUR 1.8 million in 2019.

The earned premium net of reinsurance amounted to EUR 834 million for the year ended 31 December 2020 and EUR 848.4 million for the year ended 31 December 2019. Belgium, France and Luxembourg are the Company's primary markets in 2020 with additional core markets being Denmark, Iberia, UK Expatriates, Finland and Sweden.

2020 Claims incurred, net of reinsurance amounted to EUR 713 million (charge) while 2019 Claims incurred, net of reinsurance amounted to EUR 888.4 million (charge) and are driven by surrenders for both the Dedicated Funds and the Unit-Linked business.

Change in Other technical provisions, net of reinsurance stands at EUR 246 million for 2020 (charge) and EUR 755.9 million (charge) for 2019.

Unrealised gains on investments stands at EUR 581 million for 2020 and EUR 903.9 million for 2019 and unrealised losses on investments amounts to EUR 419 million in 2020 and EUR 74.7 million for 2019. The investment income amounts to EUR 115 million in 2020 and EUR 95.5 million in 2019.

Net operating expenses decreased to EUR 68 million in 2020 compared with EUR 82.2 million in 2019.

The technical provisions increased at EUR 7.739 billion as at the end of December 2020 compared to EUR 7.482 billion as at end of 2019 (increase of 3.4%), resulting from positive market impact of EUR 163 million combined with an overall positive net flow of EUR 121 million.

The Company has no other activity than directly related or derived from its life insurance activities. Non-Technical Income are recorded in Other Income and are mainly composed of interests on Intragroup loans, interest on advances made to policy holders, interests derived from tax receivable, reversals of previous years taxes, liquidation process and reversal of prior years' excessive provisions.

Key balance sheet figures for the year ended 31 December 2020 and 2019 are:

Assets

EUR	2020	2019
Intangible assets	3,531,267	5,316,277
Investments	469,691,333	436,901,298
Investments for the benefit of life insurance policyholders who bear the investment risk	7,299,494,903	7,023,060,084
Debtors	37,792,687	84,070,590
Other assets	93,673,119	106,472,775
Prepayments and accrued income	14,531,129	13,589,091
Total assets	**7,918,714,438**	**7,669,410,115**

Liabilities

EUR	2020	2019
Capital and reserves	**101,613,523**	**97,268,953**
Subscribed capital	50,200,525	50,200,525
Share premium account	18,825,233	20,520,274
Reserves	16,787,053	15,000,000
Profit brought forward	10,456,142	9,707,851
Profit for the financial year	5,344,570	1,840,306
Subordinated liabilities	**6,941,019**	**6,941,019**
Technical provisions	**439,508,797**	**458,529,566**
Technical provisions for life insurance policies where the investment risk is borne by the policyholders	**7,299,494,903**	**7,023,060,084**
Provisions for other risks and charges	**7,078,875**	**5,637,606**
Creditors	**63,477,861**	**77,245,614**
Accruals and deferred income	**599,460**	**727,273**
Total liabilities	**7,918,714,438**	**7,669,410,115**

Key Profit & Loss figures for the year ended 31 December 2020 and 2019 are:

EUR	2020	2019
Earned premiums, net of reinsurance	833,929,054	848,394,491
Investment income	114,865,797	95,510,100
Unrealised gains on investments	581,166,894	903,904,386
Other technical income, net of reinsurance	19,200,264	20,264,068
Claims incurred, net of reinsurance	-712,737,795	-888,432,956
Change in other technical provisions, net of reinsurance	-245,913,087	-755,967,433
Bonuses and rebates, net of reinsurance	-5,691,313	-6,682,229,
Net operating expenses	-68,025,174	-82,240,458
Investment charges	-76,082,481	-48,039,332
Unrealised losses on investments	-418,610,078	-74,689,404
Other technical charges, net of reinsurance	-16,752,033	-10,995,750
Balance on the technical account - life insurance business	**5,350,048**	**1,025,481**
Other Income	927,655	1,724,532
Other charges, including value adjustments	-245,565	-75,984
Profit on ordinary activities after tax	**6,032,138**	**2,674,029**
Other taxes not shown under the preceding items	-687,568	-833,723
Profit for the financial year	**5,344,570**	**1,840,306**

2.3 - Personnel of the Company

Personnel employed during the year

The average number of persons employed by the Company in full time equivalent for the year ending 31 December 2020 amounts to 135 (2019: 142) and is broken down into the following categories:

Categories	2020
Management	62
Employees	73
Total	**135**

As of December 31 2020, the Company had 133 Full Time Equivalent ("FTE") employees (2019: 135) with an average over the year of 132 FTE and a yearly average headcount of 138 employees.

Since 2019, the Branch entered into a service level agreement with APICIL entities and most of its resources were transferred to these other entities of the APICIL Group. The few remaining employees were transferred to the Company. As of 31 December 2020, the sole person working for the branch in France is its Manager *(Mandataire Général)*, Mr. Thierry Jouseau.

2.4 - Underwriting performance

Products, markets and distribution

The Company offers unit-linked and saving life assurance policies whose benefits are linked to the value of an investment portfolio. The Company offers a wide range of asset classes and investment strategies and calibrates each solution precisely using an array of fund types, financial products and investment vehicles – providing the flexibility and diversification that allow its clients to optimise risk / return profiles. Under certain conditions, the client (policy holder) can change asset allocation, custodian bank and investment manager during the life of a contract.

More particularly, the Company proposes the following assets in its products

1. External investment funds managed by experienced asset managers;
2. Internal collective funds offering mandated collective management in line with different policyholders' risk profiles;
3. Internal dedicated funds that allow discretionary management, in line with the policyholder's personal objectives;
4. Specialised funds that allow the holding of specific classes of assets without discretionary management.

The business generated via the French branch relates to life assurance activities as per Annex 2 of the Luxembourg law of 7 December 2015 on insurance sector, as amended, and also referred to in Article R 321-1 of the French Insurance Code.

The clients are individuals or legal entities.

The Company develops cross-border financial planning solutions for wealthy clients across Europe, more specifically in Belgium, Denmark, Finland, France, Luxembourg, Portugal, Spain, Sweden and for the UK expatriate market.

OneLife's customised solutions are based on clients' financial, fiscal, legal and family circumstances. Its open architecture approach provides clients with unit-linked contracts that offer a large choice and great investment flexibility across a wide variety of funds: from external funds to internal collective and dedicated funds. The products derived from the book of business previously developed by APICIL Life in France are distributed through the branch in Paris via advisors in wealth management.

The main products currently marketed by the Company are listed in the table below:

Client segment	(Ultra) High Net Worth (1M-10M) and Affluent
Product type	– Life assurance – Capitalisation bond – Individual pension
Underlying structure	– External funds – Internal collective funds – Internal dedicated funds – Specialized insurance funds
Main Products names & category	– Camelea/Serenity (Unit Linked) – Adiameris (Dedicated Fund) – Pension Belgium (Pension) – Wealth France / Capitalisation France (Wealth) – Wealth Belgium (Wealth) – Wealth Finland (Wealth) – Wealth Sweden (Wealth) – Wealth Spain (Wealth) – Wealth UK / Capitalisation UK (Wealth) – Personal Pension Denmark (Pension) – Wealth Luxembourg / Capitalisation Luxembourg (Wealth) – Wealth Portugal (Wealth)
Markets	– Belgium – UK Expats – France – Sweden – Finland – Luxembourg – Denmark – Spain – Portugal
Main distributors	– Agents – Brokers/CGPI (IFAs) – Banks – Family Offices – Asset Managers
Jurisdiction	– Luxembourg – France

The business generated via the French branch relates to life assurance activities as per Annex 2 of the Luxembourg law of 7 December 2015 on insurance sector, as amended, as follows:

I. Life, death and mixed insurance, annuity insurance - other than marriage and birth assurance - not linked to investment funds, as well as ancillary insurances to such insurances
III. Life, death and mixed insurance, annuity insurance linked to investment funds
IV. Capital redemption operations

and also referred to in Article R 321-1 of French Insurance Code for the following products:

20. Life and death operations whenever commitments are dependant from the life of policyholders as well as other activities listed in business sector 22, 23 and 26
22. Insurances linked to investments funds whenever commitments are dependant from the policyholders' life duration and linked to an investment fund

The activities mentioned under 20 and 22 include complementary insurances activities as guarantees in case of death or disability of the policyholder

24. Capitalisation products whenever collection of premium aim at capitalizing these and include, for regular premium or unique ones, direct or indirect, commitments as to the duration or the amount

APICIL Life also had a small portfolio of life insurance contracts in Portugal (in run-off mode).

The gross premiums written are broken down as follows:

EUR	2020	2019
Individual premiums	834,756,346,	849,309,781
Total	**834,756,346**	**849,309,781**

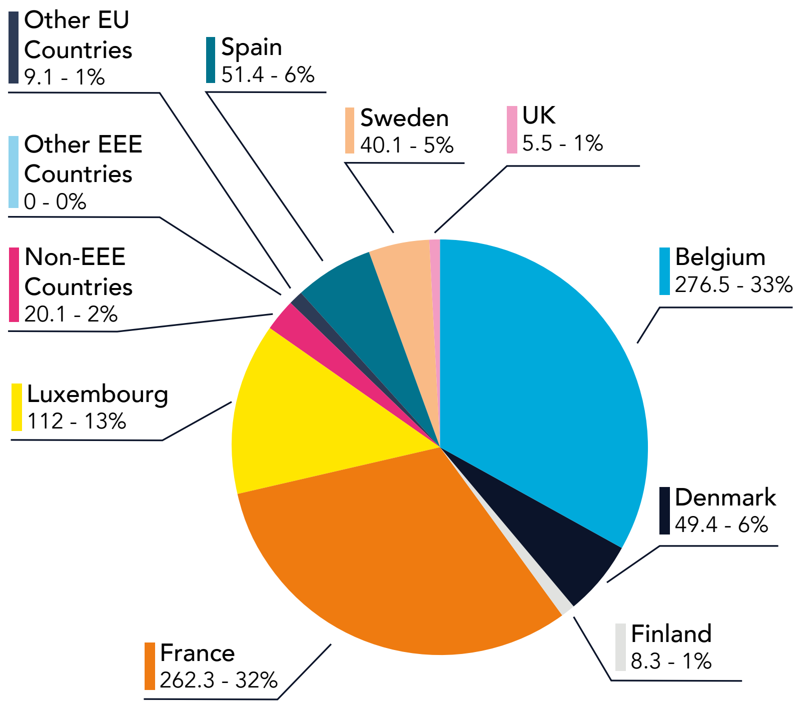
EUR	2020	2019
Periodic premiums	1,705,549	1,829,983
Single premiums	833,050,797	847,479,798
Total	**834,756,346**	**849,309,781**

EUR	2020	2019
Premiums from non-bonus policies	75,889	79,463
Premiums from bonus policies	38,584,418	60,178,258
Premiums from policies where the investment risk is borne by the policyholder	796,096,319	789,052,060
Total	**834,756,346**	**849,309,781**

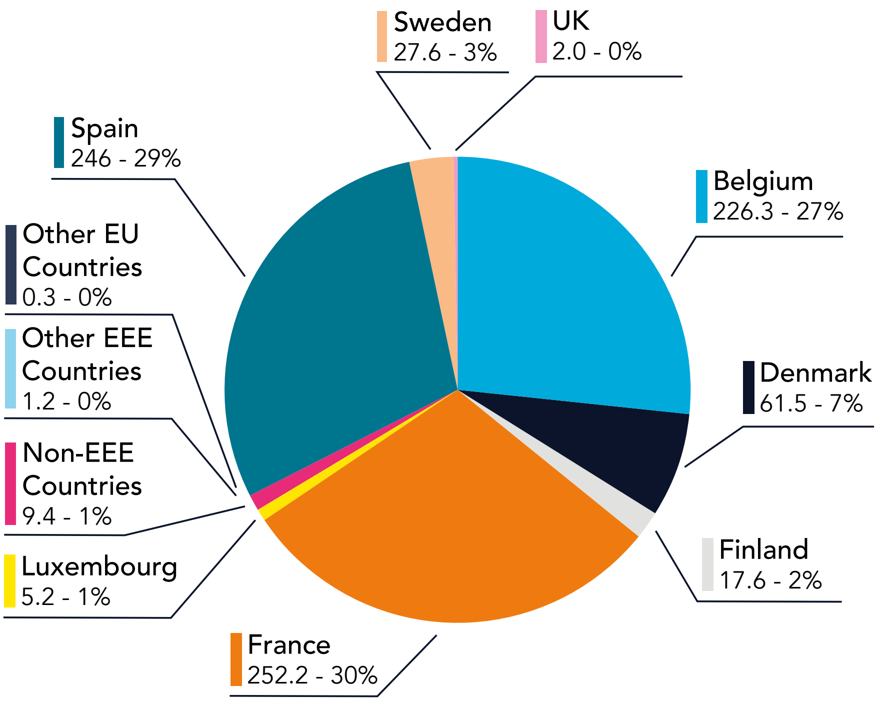
The geographical distribution of gross premiums written is as follows:

EUR	2020	2019
Luxembourg	111,968,795	5,191,234
Other EU countries	697,158,830	833,509,585
Non EU countries	25,628,721	10,608,962
Total	**834,756,346**	**849,309,781**

2020 (in EUR million)



2019 (in EUR million)



2.5 - Investment performance

As of 31 December 2020 and 2019, the Financial Investments were as follows:

	2020	2019
Investments for the benefit of life assurance policyholders who bear the investment risk	**7,299,494,903**	**7,023,060,084**
Other financial investments	**469,691,333**	**436,901,298**
Shares and other variable yield transferable securities and units in unit trusts	79,765,680	50,533,621
Debt securities and other fixed income transferable securities	356,302,843	356,411,443
Other loans	27,122,810	24,456,234
Deposits with credit institutions	6,500,000	5,500,000
Investment income	**114,865,797**	**95,510,100**
Income from other investments	27,189,897	32,611,464
Gains on realisation of investments	87,675,900	62,898,636
Investment charges	**76,082,481**	**48,039,332**
Investment management charges, including interest	8,050,726	9,021,066
Losses on the realisation of investments	68,031,755	39,018,266

The Company also had the following cash at banks and in hand:

	2020	2019
Cash at bank and in hand	93,490,422	106,226,708

2.6 - Performance of other activities

The Company has no other activity than directly related or derived from its life insurance activities. Non-Technical Income is recorded in Other Income and is mainly composed of Interests on Intragroup loans, interest from advances made to policyholders, interests derived from tax receivable, reversals of previous years taxes, liquidation process and reversal of prior years' excessive provisions.

2.7 - Any other information

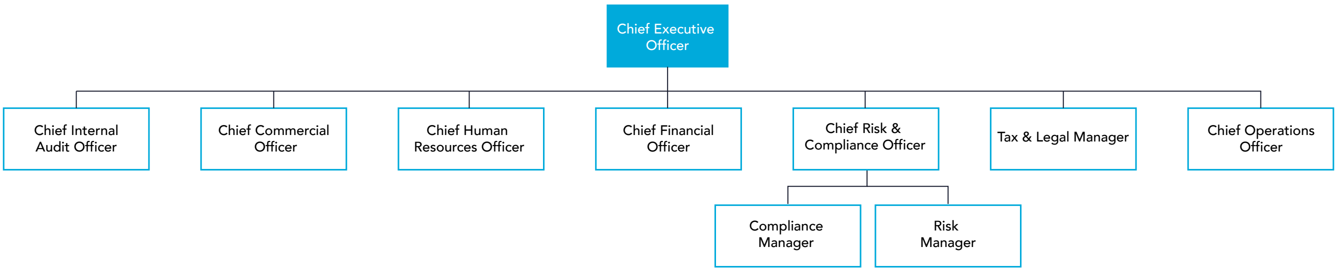
Reference is made to previous sections mentioning the changes in the Group and the Company's structure and organisation.

3. SYSTEM OF GOVERNANCE

3.1 - General information on the system of governance

3.1.1 Organisation chart

The following graph illustrates the situation as of **31 December 2020** including the department heads, and the key function owners:



It is worth noting that the Chief Internal Audit Officer, in addition to the administrative reporting to the CEO, also reports to the ARCC, from a functional aspect.

In addition to this chart, as of 31 December 2020 and as of the date of this report, the legal representative (*Mandataire Général*) of the branch in France being Mr. Thierry Jouseau reports to the CEO of the Company.

Decisions engaging the Company may be taken at different levels: the **General Meeting of Shareholders**, the **Board of Directors**, the **Chief Executive Officer** and the different **Committees**.

3.1.2 General Meeting of Shareholders

The General Meeting of Shareholders is not involved in the day-to-day operations of the Company. Its role is to review and approve the strategy proposed by the Board of Directors and to control its implementation. To do so, the General Meeting of Shareholders is principally given the authority to appoint the Directors and to approve the Annual Accounts.

3.1.3 Board of Directors

Directors and is principally in charge of determining the Company's strategy. One of the Director is independent from the Apicil Group. In this context, the Board reviews the means of achieving the objectives, establishes internal controls, and monitors and evaluates the performance against the strategic plans and budgets.

To do so, it is given all the powers not expressly reserved to the General Meeting of Shareholders by law or by the Articles of Association.

The Members of the Board have extensive knowledge and experience in the areas of life-insurance business, private banking, financial markets, securities, brokerage, finance, risk management, operating management, business development, strategic direction of the Company.

The Board meets at least four times a year on a quarterly basis. Additional Board Meetings may be convened with appropriate notice at any time to address specific needs of the business. Any Director may call for a meeting of the Board of Directors. The convening notice includes an agenda of all the business to be discussed and resolved at the meeting. The agenda, proxy forms and related information must be provided to each Director prior to the meeting, within the timeframe indicated in the Articles of Association (Article 10.3). Resolutions may also be adopted by the Board of Directors (in writing, or via electronic mail). Any Board Member may request the inclusion of a matter on the agenda.

The Board appoints and removes the Chief Executive Officer, or other party responsible for the day-to-day oversight of the Company's activities. Any changes in the Board composition is recommended by the Nomination and Governance Committee and submitted to the Board for approval (appointment or removal).

The Board Secretary also assists and advises the Board, the Chairman, the CEO and all Board Members in exercising their duties. The Board Secretary ensures that the Board procedures are complied with and that the Board acts in accordance with its obligations under the law, the Articles of Association, the internal rules and regulations. The Board Secretary also makes sure to share with the Board any matters discussed at SGAPS meetings that could impact the Company.

Access to information and management:
The Board of Directors can have access to all corporate and business information needed to fulfil their duties.

The Board proceeds to an annual self-assessment of its own performance and of its Committees (Audit, Risk and Compliance Committee, Nomination Remuneration and Governance Committee).

The Board has adopted Terms of Reference to promote strong and effective governance.

The Board also appoints the Manager (*Mandataire Général*) of the branch in France who reports to the Chief Executive Officer (Delegate to the daily management).

The CEO is in charge of day-to-day operations and has all the powers required to fulfil this role. The CEO is the preferred, if not exclusive, point of contact between the Company and the Commissariat aux Assurances.

3.1.4 Committees

3.1.4.1 Committees reporting to the Board of Directors:

- Audit, Risk and Compliance Committee (**ARCC**);
- Nomination, Remuneration and Governance Committee (**NRGC**).

These Committees have been put in place by the Board; they report regularly to it and assist it in fulfilling its duties.

The ARCC comprises three Members of the Board.

- Mr. Renaud CELIE
- Mr. Alain ESQUIROL
- Mr. Michel WOLTER (Chairman).

The ARCC is a committee of the Board from which it derives its authority and which regularly reports to it in order notably for the Board to make final decisions in light of the ARCC recommendations.

Its current composition gathers competencies such as senior management experience, risk management, strategic and operating management, knowledge of financial markets, private banking. The Chairman of the ARCC is an independent Director.

The ARCC meets separately, as needed, with the Chief Executive Officer, the Chief Financial Officer, the Chief Actuary, the Risk Manager, the Chief Internal Audit Officer, the Chief Compliance and Regulatory Officer, the

Tax & Legal Manager, the representatives of the Independent Auditor or any other person and may require the same to attend any meeting(s) of the ARCC.

The ARCC meetings are held on a quarterly basis, any additional meetings may be convened.

The ARCC has authority to select, evaluate, appoint, and replace the Independent Auditor with the approval of the Board and approves in advance all audit engagement fees and terms and all audit-related, tax compliance and other non-audit engagements with the Independent Auditor. The ARCC consults with Management, but shall not delegate these responsibilities.

The ARCC has the authority, to the extent it deems necessary or appropriate, to retain special legal, accounting, or other consultants to advise the Committee. The Company provides funding, as determined by the ARCC, for payment of compensation to the Independent Auditor, any advisors employed by the ARCC and ordinary administrative expenses of the Committee.

The ARCC regularly reports to the Board on its activities. These main activities cover the integrity of the Company's financial reporting process and the Company's system of internal accounting and financial controls, oversight of the Independent Auditors, oversight of Risk Management, oversight of Internal Audit, oversight of Legal/Regulatory/ Compliance Responsibilities, Oversight of General Management Responsibilities.

The NRGC is currently composed of three Members

- Mr. Renaud CELIE
- Mr. Alain ESQUIROL
- Mr. Michel WOLTER (Chairman).

The NRGC is a committee of the Board from which it derives its authority and which regularly reports to it in order notably for the Board to make final decisions in light of the NRGC recommendations.

The Board has delegated its operational responsibilities related to nomination, remuneration and governance matters to the Committee. It assists the Board mainly in:

- Identifying individuals qualified to become Board members and recommending to the Board the director candidates (nominees) for the next annual shareholders' meeting.
- Annually reviewing of the Board's performance and recommending to the Board director candidates for each committee for appointment by the Board.
- Determining, approving the compensation structure for members of senior management (members of the Executive Committee), staff members and certain highly compensated employees, in accordance with guidelines established by the Committee from time to time, and special compensation and benefits policies.

Additionally, the Committee will regularly review the Company's management resources, succession planning and development activities, as well as the performance of senior management. The Committee is charged with monitoring the Company's performance toward meeting its goals on employee diversity.

As far as governance is concerned, the Committee takes a leadership role in shaping corporate governance policies and practices, including recommending to the Board the Corporate Governance Guidelines applicable to the Company and monitoring its compliance with said policies and guidelines.

The Committee meets as often as it determines, but not less frequently than once a year, and as it deems necessary.

A remuneration policy is adopted and there are two different status of employees in the Company:

- Non-ICA Employees
- ICA Employees

Non-ICA employees are Experts, Managers, Department Manager, Department Head (including executive committee members) are not subject to the ICA, for the financial side of their compensation.

ICA employees are employees below the Manager level.

Emoluments granted to members of the Board of Directors by reason of their responsibilities with respect to the financial year 2020 are included in Administrative expenses in the Profit and Loss Account. No commitments have been entered into with respect to retirement pensions for former members of the Board of the Company.

3.1.4.2 Committee with Chairman reporting to the Board of Directors

The Executive Committee (ExCo).

The ExCo is in charge of implementing the strategy as defined by the Board.

The CEO, who reports directly to the Board of Directors, directs it.

As of 31 December 2020, the ExCo is composed as follows:

Mr. Romain CHEVALIER	Chief Commercial Officer
Mr. Antonio CORPAS	Chief Executive Officer (Chairman)
Mr. Elio FRATINI	Chief Operations Officer
Mr. Cedric LOOTVOET	Chief Financial Officer
Ms Laurence PARISON	Chief Human Resources Officer

The Chief Internal Audit Officer, being responsible for a key internal control function, is not member of the but attends its regular meetings.

Mr. Jerome DRIF, Chief Compliance, Risk and Regulatory Officer, joined the ExCo on 1st January 2021.

3.1.4.3 Committees reporting to the

- **Risk & Control Committee (RCC);**
  The RCC's purpose is notably to assist the and CEO in their internal control duties, to act as a focal point for instigation, monitoring, review and communication of relevant audit matters, internal control, risk, compliance and actuarial risk matters, to review the operational risks identified by the business and to ensure an integrated approach to risk and control matters.

- **Investment Committee (IC).**
  The IC is an executive committee whose purpose is to: implement the investment guidelines, review all investment on own portfolio and guaranteed rate portfolios, monitor the investment performance, review all investment exceptions, the credit risks and the accumulation exposures, implement internal controls and risk management in respect of investment processes, monitor business conduct and compliance with laws, regulations and relevant codes of conduct where these relate to investments. The IC recommends to the the acceptability of client's investments that meet with regulators needs, monitor hedging, approve new funds and maintain compliance with funds as approved by the CAA.

- **Monitoring Branch Committee (MBC)**
  The MBC purpose is to: assist the CEO and the ExCo in its duties to identify, assess and monitor all material risk exposures and internal topics in relation to the activities delegated to the French Branch, be a forum to discuss and deal with specific topics identified by or brought to the attention of the MBC and review the operational risks linked to the delegated activities.

- **Operational Committee (OPCOM)**
  The OPCOM's purpose is to assist the ExCo in following operational implementation of the strategy, take decisions on operational blocking issues or on options related to operational implementation, assist the ExCo in its duties to identify, assess and monitor all material risk exposures and internal control topics; discuss and deal with specific topics identified by or brought to the attention of the OPCOM; and support the lifecycle of the Système de Management Intégré des Risques Communautaire (SMIRCO).
- **Outsourcing Activity Committee (OAC)**
  The OAC's purpose is to assist the CEO and the ExCo in their duties to identify, assess and monitor all material risk exposures and internal control topics in relation to the identified outsourced critical or important functions or activities, review and manage the operational risks linked to the delegated activities, review the Scorecards of the outsourced critical activity, approve the Outsourcing of critical or important functions or activities Policy, and be a forum to discuss and deal with specific topics identified by or brought to the attention of the OAC.
- **Product and Steering Committee (PSC)**
  The PSC's purpose is to define, review the product strategy, review alignment of products to the Company's strategy, agree on criteria to launch or withdraw a product, monitor scope, budget, time and determine the schedule product's review. It is part of the Product oversight Governance.

3.1.4.4 Committees implemented at the level of the life insurance company

A Client Acceptance Committee (CAC) has the authority to review and accept or refuse applications from prospective and existing clients relating to cases that qualify as high risk.

3.1.6 Group structure and shareholders

Since 26 November 2019, OneLife is owned by APICIL Prévoyance and by APICIL Epargne S.A., which is entirely owned by APICIL Prévoyance.

3.2 - Fit and proper requirement

The Company has a policy to observe the obligations included in Solvency II Directive and detailed in the EIOPA Guidelines.

The Fitness & Probity policy includes the minimum requirements pursuant to the Solvency II Directive requirements.

The functions subject to Fitness& Proper assessment are:

- Members of the Boards of Directors
- Members of the Boards of the
- Key functions, as defined by the Solvency II guidelines
- Specific Senior Management or key positions as identified by HR.

Persons proposed for Senior Management Positions must be honest, diligent and of good reputation and must act and have acted ethically and with integrity.

In determining a person's honesty, integrity and reputation, the Company will have regard to matters, which may have arisen in either Luxembourg or elsewhere.

3.2.1 Documents to support Fitness Assessment Procedure

Persons proposed for Control Functions, or Senior Management Positions must be adequately trained, qualified and experienced regarding the nature of the functions and the required qualifications of the functions.

Due to the complexity of certain functions within the Company and in connection to the above criteria, for assessing one's qualification, training and experience (fitness) for one position, the Company shall seek for each applicant to a SMP relevant documents and whenever deemed necessary, supplementary information and/or documents are requested.

3.2.2 Documents to support Probity Assessment

Persons proposed for CFs, or SMPs must be honest, diligent and must act ethically and with integrity.

In connection to the above criteria, for assessing one's honesty, integrity and good reputation, the Company shall seek for each applicant to a SMP some relevant documents.

3.3 - Risk management system including the own risk and solvency assessment

As part of APICIL Group integration, OneLife is integrating the "Système de Management Intégré des Risques Communautaires" (SMIRCo) approach with the aim to obtain the ISO 9001 2015 certification in 2021.

An alignment with APICIL Group Risk Management methodology has been required to ensure consistency in the aggregation of risk exposure at Group level.

Before presenting specific risks inherent to the Company's business is subsequent section 4, here below is a summary of the key principles of the SMIRCo approach (in French as derived from APICIL Group processes):

Key Principles

Driving the performance

Cartographie des processus	– **Objectif** : Cartographier les activités
Cartographie des risques	– **Objectif** : Identifier, suivre et maîtriser les risques
Tableau de bord	– **Objectif** : Suivre la performance de l'activité – **Fréquence** : Différentes fréquences possibles (indicateurs mensuels, trimestriels, …) – Indicateurs de performance et contextuels
Plan d'actions	– **Objectif** : Suivre l'avancement des actions du processus/service – **Fréquence** : La mise à jour se faut au fil de l'eau selon l'avancement de chaque action. La revue est effectuée lors de la revue mensuelle de la performance
Grille de polyvalence	– **Objectif**: Identifier les compétences nécésaires à la réalisation de l'activité, identifier les compétences en interne, les besoins en formation, les hommes clés

3.3.1 Risk Governance

The Board assumes final responsibility for the implementation of an appropriate risk system within the Company and to satisfy itself that an appropriate level of governance is exercised to ensure that risk is integrated into decision-making and control within the Company. The Board also assumes the final responsibility for the Risk Strategy and Risk Appetite definition.

The Board in turn delegates to a sub-committee, i.e. the ARCC the responsibility to undertake review of the corporate risk system, and the risk exposures to ensure that Management continue to manage the business within the Board's prescribed Risk Appetite, and that key risk exposures do not exceed Board approved limits.

Having established the risk exposure constraints for Management to operate within, the ARCC delegates to the Executive Committee the authority to continue operations such that the limits are not exceeded.

The Executive Committee in turn has established dedicated oversight committees for managing the risk exposures, the RCC (Risk & Control Committee).

The aim of the RCC is to improve the efficiency and the effectiveness of the corporate governance and is established to assist OneLife Chief Executive Officer and the Executive Committee in their internal control duties.

3.3.2 Corporate Three lines of Defence Model

The Corporate Governance is structured following the "Three Lines of Defence" model:

- **First Line of Defence** – Day-to-day risk management, performed by the various departments under the supervision of department heads.

  In each department, employees, managers and department heads have a deep understanding of their daily operations and the related risks, as such:

  - They own and manage risks (i.e. "risk owners");
  - They are responsible for identifying, assessing, controlling and mitigating risks;
  - They maintain effective internal controls and execute risk and control procedures;
  - They implement corrective actions to address process and control deficiencies;
  - They design and implement "internal rules" in coordination with other departments;
  - They guide the design of controls into systems and processes.

- **Second Line of Defence** – Risk Oversight, performed by the Actuarial function, Risk Management function, Compliance function;

  The responsibilities of these functions include:

  - Supporting management policies;
  - Providing risk management frameworks identifying known and emerging issues;
  - Identifying changes in the organization's risk appetite;
  - Assisting management in developing processes and controls to manage risks and issues;
  - Providing guidance and training on risk management processes;
  - Monitoring implementation of effective risk management practices and adequacy and effectiveness of internal control;
  - Alerting to emerging issues and changing regulatory and risk scenarios.

- **Third Line of Defence** – Independent Assurance, performed by Internal Audit department. Additional information on how Internal Audit provide the governing body and Senior Management with comprehensive assurance, based on the highest level of independence and objectivity within the organization, is described in the Internal Audit section of this report.

3.3.3 Risk Management Team - Compliance & Risk Department

The Risk Management team – Compliance & Risk Department is responsible for:

- Co-ordinating the risk management programme and providing advice and guidance, including the development of standard templates and tools to assist the Company in managing risk;
- Developing and conducting training on the principles of risk management, risk assessment and on how to implement risk management effectively;
- Ensuring that strategic risks are considered by conducting an annual Reverse Stress Test to identify exogenous risk events which may lead to the business model no longer remaining viable and maintaining a register of endogenous risks which can lead to a failure of Executive Committee to achieve the objectives of the strategic plan. Further registers will be maintained of the financial and operational risks identified through the risk self-assessment process;
- Developing a comprehensive risk event reporting system and maintain information on losses or adverse events when risks crystallise;
- Supporting Management in the effective operation of the risk management system,
- Monitoring the risk management system;
- Maintaining a Group-wide perspective and aggregated view of the risk profile;
- Reporting on risk exposure and advise Management on risk in relation to strategic considerations and major initiatives and projects;
- Identifying and assessing emerging risk;
- Establishing policies and procedures to guide risk management activity.

The Risk Manager reviews the risk management process annually and reports this in an annual report on risk management to the ARCC.

3.3.4 Risk Correspondents

Within operating departments there are a number of individuals identified to fulfil the role of Risk Correspondent.

Their objective is to support the Risk Owner (usually the Department Head) in the embedding of a strong risk culture in the Business Unit, assisting the Risk Management team in compiling the Business Unit's Risk Register and support the reporting of Risk Events.

Formal Terms of Reference for the role are agreed by the RCC.

3.3.5 Risk Map

OneLife uses a pre-defined risk map, which is structured as follows (high level):

3.3.6 The Business' Review of Risk

The mapping of the Operational risk is mainly managed via the identification of the processes risk profile of the company. It is performed via the "Risk and Control Self-Assessment" approach where Risk Management department accompany the various department in the following main steps:

1. Identification of the risks
2. Assessment of the risks (gross score)
3. Identification of the components of the system of elements addressing the risk (SEAR) and assessment of the risk (net score)

Risk Management then define a yearly control plan in order to verify the processes risk assessment and the implementation of the elements addressing the risk. Mitigation actions or additional controls are then proposed to the involved departments.

Risk Management department also perform an Issue Based Risk Assessment (IBRA), which is mainly a risk assessment, based on events occurred with a high frequency and impact on a specific process (ad-hoc basis).

For the IBRA specific scoring grid and evaluation method are adapted to the process and validated by the Risk Assessment participants and the whole process is mentioned in the final report for a global overview.

Risk Management also drives the mapping of the Strategic risks with the Department Heads.

Significant strategic risks (as assessed based on their probability and impact) are identified in the mapping and the related mitigation actions are specified as well.

The rating (gross and net) of the mitigation put in place is based on 3 steps:

1. Calculation of the gross severity (low, medium, high or extreme): defined based on the probability and impact of the risk without considering the system of elements addressing the risk.
2. The percentage of attenuation of the elements addressing the risk (based on the setting up and the effectiveness)
3. Application of the percentage of attenuation to the gross severity that gives the net severity of the risk.

An appropriate monitoring of any change affecting those risks is in place and the mapping of the strategic risks is reviewed at least once a year and in case of major changes affecting the company.

3.3.7 Risk Exposure Reporting Process

The OneLife Company's Risk Exposure is estimated through process risk assessments, the collection of operational incidents (Risk Event Data collection – or "RED") and the quarterly monitoring of key risks indicator which are reported in the Risk Exposure Monitoring ("REM") report.

The RED collection process consists of the systematic collection and recording of operational risk events across the Company. Risk Events are communicated to Risk Management via an internal tool; a report is presented to the ARCC and RCC Committees on a regular basis.

The REM is produced by the Risk Management team on a quarterly basis, with financial and non-financial data collected across various departments of the Company. It includes breaches where applicable and an assessment of the exposures. The REM report is presented to the sub- committees and to the ARCC.

The full picture on Risks Exposure (including the risk ratings, defined strategy, risk owner, mitigation actions, etc.) is presented to the ARCC and RCC Committees in order to validate the Risk Assessment: a regular follow-up on mitigation actions is done.

The GRAPE report is then presented to the Audit, Risk and Compliance Committee and it used then by the Board of Directors as a decision maker tool.

3.3.8 ORSA process

The ORSA policy is adopted and states that the *"ORSA is a process that seeks to link the ERM framework to the Corporate Strategy and to the Solvency/Capital requirements of the enterprise. The business strategy will imply a number of risks that the business will face, but at the same time, a number of risk factors may change over time, such as the external economic environment, internal business practices and the competitive landscape. The ORSA needs to demonstrate that, over all reasonable expectations of such impacts, the business can continue to remain solvent.*

The Board needs to be assured that the ERM is robust with good governance, supports their expressed appetite for risk and of the business's ability to identify all of the types and levels of own risk (quantitative and qualitative) to which they are exposed as well as management actions through mitigation or adequate capital resources to survive the impact of such risks crystallising. Such analyses will have broader reach than just the risks specified for calculating the SCR, as well as having different calibrations of the impacts and likelihoods of the SCR risks.

There is a need using stress and scenario analysis to project over the horizon of the business plan –three years in OneLife's case - the outcomes in respect of capital positions arising from the impacts of own risks under range of scenarios.

The outcome of the ORSA is an ability to support the statements that, OneLife's plans are consistent with the Risk Appetite, that the Group is adequately capitalised on the basis chosen for the own risk assessment as well as on a regulatory basis, and that the Group will continue to be so over the planning horizon."

The ORSA is completed at a point in time during the year and provided to the regulators according to the requirements.

The ORSA exercise is undertaken on a yearly basis; OneLife aims to deliver an ORSA based on the latest available 5-year budget. However, if a significant exceptional event affecting the structure of the Group occurs then the ORSA process would be triggered and an ad-hoc assessment (in part or in full as appropriate) would be conducted.

The Board, the ARCC, the , the RCC and the CEO are also entitled to request an ORSA to be produced at any point in time.

Concerning the ORSA report structure, which is not fixed and can evolve according to report needs, the information included must cover at least (not exhaustive):

- Information on the Structure of the Group
- Information on the Business, Markets and Performance
- Information on the System of Governance
- Information on the Risk Profile
- Assessment of the overall solvency needs
- Forward-looking perspective of the overall solvency needs assessment
- Valuation and recognition bases of the overall solvency needs
- Continuous Compliance with Regulatory Capital Requirements
- Continuous Compliance with Technical Provisions
- Assessment on the potential Deviations from assumptions underlying the SCR calculation

The conclusion includes at least:

- The qualitative and quantitative results of the forward looking assessment and the conclusions drawn by the undertaking from those results
- The summary of the methods and main assumptions used

During the year Risk Management will ensure a process of risk reporting (in agreement with the results of the annual ORSA report) and continuous monitoring of the ORSA results (actuals vs. projected). In practice, whenever the Actuarial Team will report Solvency II coverage (which under Solvency II is at least on a quarterly basis), Risk Management will be informed of report any breach of the Risk Appetite Solvency coverage limit and it will be reported to the relevant stakeholders.

The ORSA assumptions and results are reported to the for comments and approval before presentation to the ARCC and the ORSA assumptions and results have to be approved by the Board.

ORSA results are interpreted into budget approval process.

The ORSA process and modelling takes also into accounts risk as assessed as high and identifies if they are covered in the SCR calculated by the standard formula and for in stressed scenarios.

3.4 - Internal control system

3.4.1 Compliance Team – Compliance/Regulatory & Risk Department

Compliance team's role within OneLife is to support the Company and its key stakeholders against business practices that would not be in line with legal, regulatory, internal rules and in some aspects, ethical requirements.

This includes also the protection against reputation risk which is one of the key assets for development success.

The Compliance & Regulatory function includes the following main activities:

Category	Tasks
AML / CTF – Anti-money laundering / Counter Terrorist Financing	Review of Know-You-Customer files and atypical transactions. Perform regular controls on a "risk-based" approach. Name filtering of clients (including other parties to the policy like beneficiaries, assignees, trustees, payees etc) and brokers against official lists and exposed persons lists. Compliance performs the reporting of suspicious transactions or activities to authorities and the Chief Compliance & Risk Officer is the MLRO (Money Laundering Reporting Officer).
Compliance training	Following the compliance training plan, annual training is provided on AML / CTF, complaint handling, fraud prevention, GDPR and other related topics to employees.
Complaints handling	Centralization and analysis of complaints. Periodic reporting to ARCC. However, the member of the Executive Committee responsible for complaints (as per CAA Regulation 19/3) is the Chief Operating Officer.

Category	Tasks
Data protection and record retention	Set up data protection policies. Support other departments by performing reviews, setup of record retention schedules, etc. In 2020, a group of data protection correspondents was set-up, made of representatives of each department, in order to provide the DPO with support in this matter.
Distribution network review	Review the distribution network of the different insurance channels in order to assess if the brokers are licensed and do not present reputation risk for the Company. This responsibility was transferred to the Business Coordination team during S2 2020.
Fraud prevention / investigation	Promote a fraud awareness culture. Investigate potential cases of fraud. Propose procedures / controls / remediation actions based on findings.
Internal code of conduct / ethics	Develop policies and procedures that foster an ethical behaviour of all employees.
Internal procedures review	Review internal procedures in order to identify if those procedures take into consideration compliance risk.
Product review / product acceptance	Review new products and their development in order to raise and address on time potential compliance issues. Suggest modifications if needed.
Project support	Support ongoing project which may have a compliance impact.
Rules of conduct / Information to clients	Review proper mechanisms for information to clients (complete / accurate / timely).
Whistle Blowing	The Chief Compliance & Risk Officer is the contact person "GPM - Good Practice Manager" and is responsible for centralizing and handling alerts of unethical behaviour raised by employees in case an employee does not want to use the external PWC channel.
Regulatory watch	Make a follow-up of new or updated laws, rules and regulations, carry out a gap analysis and set-up an operational action plan for implementing the regulatory requirements in the Company.

The Compliance function documents its controls and issues recommendation when appropriate. The controls include the N2 controls carried out on the French branch of OneLife, who delegated the administration of the branch portfolio.

It is an independent function and reports to the CEO and to the ARCC where it has direct access to Board members.

In addition, the function disposes of own resources and budgets to seek external support in case of need.

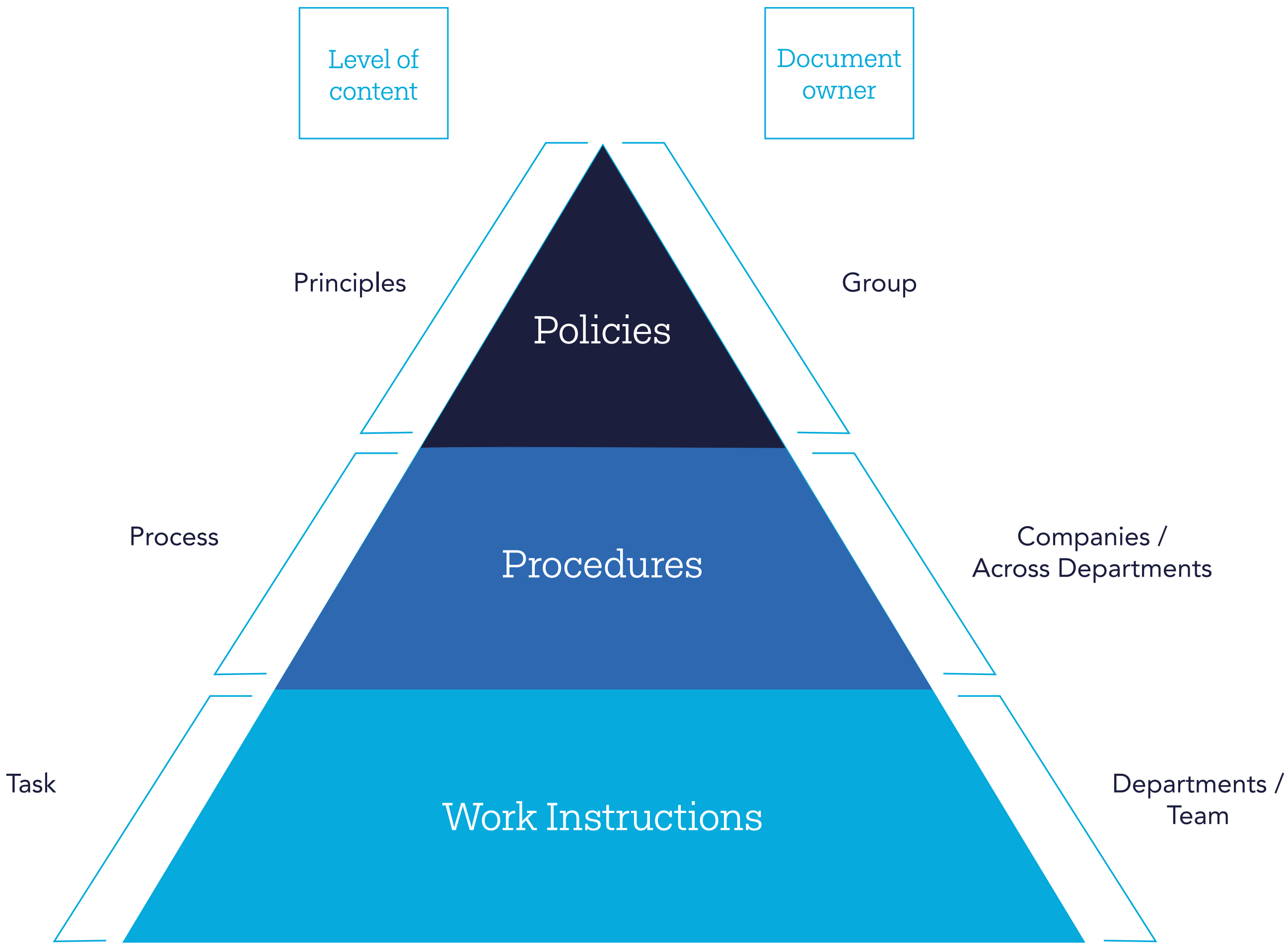
3.4.2 Internal rules

The Company has implemented Internal Rules covering all its activities, including its life insurance activities meeting the Commissariat aux Assurances requirements. The Company's Internal Rules manual is updated on a yearly basis or when deemed necessary.

Internal Rules are centralized by Compliance, Regulatory & Risk department and made available for all employees on the Intranet. They are structured under Policies, Procedures and Work Instructions.

- **Policies** set overall principles for activities of OneLife. Some policies may derive from the Group policies;
- **Procedures** document one process within and across departments and are applicable to one or several companies. Some procedures may derive from Group's policies or procedures;
- **Work instructions** provide more detailed guidance on how to carry out a single task. Work instructions depend on the details requested to perform a specific task. In some cases, detailed work instructions may be optional if a detailed procedure is in place.

The graph below explains the level of details of each category of Internal Rules:



Trainings on some of these internal rules are organized including but not limited to Compliance topics (AML, Complaints ...).

3.5 - Internal audit function

3.5.1 Internal Audit Department

The Internal Audit department is responsible for:

- evaluating the internal controls system through reviews of the various activities of OneLife and all its affiliates (whether located in Luxembourg or abroad),
- ensuring that OneLife is adequately protected by the internal rules in place, and
- making recommendations for improvement.

Scope, responsibilities, organisation and reporting lines of the Company's Internal Audit function are defined in the Audit Charter, which has been approved by the ARCC.

The key principles and standards ruling the Internal Audit function have been made available to all staff members through the publication on the intranet of the Internal Audit Manual.

To ensure objectivity and in particular to avoid conflict of interest, a system of rotation of audit tasks is instituted within the limits of practicality, and arrangements made to avoid new recruits from within the organisation performing audit work on activities where they exercised their duties in the recent past.

3.5.2 Reporting Line

To provide for the independence of the Internal Audit activity, the Chief Internal Audit Officer reports functionally to the ARCC and administratively to the Chief Executive Officer.

The OneLife internal audit activities are reported into the Apicil internal audit yearly report to the Audit Committee of the SGAPS.

3.5.3 Risk Assessment and Internal Audit Plan

The internal audit activity of OneLife follows a risk-based approach, meaning that internal audit resources are deployed with efficiency to cover the audit universe, draw up the internal audit plan, plan audit engagements and communicate results. The yearly risk assessment is aligned to the Risk Management's methodology. Inherent business risks, mitigating controls and residual risks are evaluated.

For efficiency reasons, the Internal Audit department relies to some extent on the work of others (e.g. Risk Register compiled by Risk Management team), but expresses its opinion independently.

The Internal Audit department:

- conducts interviews with members of the Executive Committee, with Risk Management and reviews documents made available by all departments, and
- produces some high-level risk matrix representing the audit universe, a Heat Map summarising high levels risks and finally the risk-based audit plan.

The audit plan is:

- foreseen as a dynamic tool to be adapted in relation to the evolution of the business and of its related risk. Quarterly reviews of the internal audit plan are performed to take this into account;
- drawn up for at least 4 years so as to cover all activities and functions according to their risk exposure;
- approved by the CEO and the Audit, Risk and Compliance Committee.

Special investigations may be carried out by the Internal Audit department at the request of the CEO and / or the ARCC.

3.5.4 Audit Reports

Standard reports include observation, risk and recommendation. Observations are classified between Extreme, High, Moderate or Low in relation to their residual risk. The level of residual risk attached to each internal audit finding is determined as a result of the internal audit engagement, following the risk topology and the risk assessment methodology.

Management responses, with precise action plan and deadline for implementation, are included in the final report, which is graded according to the magnitude of the reported observations.

Management responses, with action plan and deadline for implementation are included in the final report, which is graded A, B, C or D, according to the magnitude of the reported findings.

3.5.5 Follow-up Process and Reporting

Recommendations raised by the Internal Audit department for the purpose of improving the organisational and internal control quality are subject to regular follow-up whose frequency is dependent on the "Recommendation Priority" as described in a procedure.

3.6 - Actuarial function

The duties of the Actuarial Function are carried out by the Company's Actuarial Team, which is part of the Company's Finance Department.

The Head of Actuarial reports to the CFO, with a dual reporting line to the CEO and access to the Board of Directors through regular attendance at ARCC meetings.

The Actuarial Function carries out the following tasks, which are summarised in an annual Actuarial Function Report to the Board of Directors:

- coordinates the calculation of technical provisions;
- ensures the appropriateness of the methodologies and underlying models used as well as the assumptions made in the calculation of technical provisions;
- assesses the sufficiency and quality of the data used in the calculation of technical provisions;
- compares best estimates against experience;
- informs the Board of the reliability and adequacy of the calculation of technical provisions;
- oversees the calculation of technical provisions where approximations have been used due to insufficient data of appropriate quality;
- expresses an opinion on the overall underwriting policy;
- expresses an opinion on the adequacy of reinsurance arrangements, and;
- contributes to the effective implementation of the risk-management system, in particular with respect to the risk modelling underlying the calculation of the SCR, MCR and to the ORSA.

Those tasks include oversight of activities in respect of the Branch portfolio, namely the calculation of technical provisions, evaluation of capital requirements and pricing of products, which are performed by the APICIL Group on behalf of the Company.

3.7 - Outsourcing

An Outsourcing policy has been set and the owner is the Tax & Legal department.

Each department of the Company is responsible for monitoring and maintaining the list of the outsourced functions/activities, including the ones considered as critical and important, within its department. This information is reflected in an outsourcing log. The information in the outsourcing log is provided by all the Company's departments to the Tax & Legal Department, which will submit the log to the Executive Committee for management.

The Executive Committee manages the outsourcing arrangements.

In order to ensure that the outsourcing of critical or important functions or activities does not impair the ability of the supervisory authorities to monitor the compliance of the Company with its obligations, the Executive Committee ensures that:

- the service providers cooperate with the supervisory authorities of OneLife in connection with the outsourced functions or activities; and
- OneLife, its external and internal auditors have effective access to data related to the outsourced functions or activities.

Each department reviews the relevant SLA from a Solvency II (outsourcing rules requirements) perspective and based on predetermined criteria. The Tax & Legal Department undertakes a second level review and proposes any necessary amendments to meet such requirements.

The Tax & Legal department reviews the SLA from a legal point of view.

Regarding the French branch's business, numerous activities/functions have been outsourced to other entities of APICIL Group.

These delegated processes are detailed in specific agreements with structured and precise follow-up and controls.

The outsourcing process for all these functions of the French branch is effective since 1 July 2019. As of that date, all employees of APICIL Life have been transferred to the APICIL Group entities taking over these activities. Some few remaining employees of APICIL Life were transferred to the Company.

Accordingly, as of 31 December 2020 and as of the date of this report, the sole person still working for the French branch is its Manager (*Mandataire Général*).

All critical or important functions or activities outsourced by the Company are as follows:

Activity type	Intra-group outsourcing	Country of performance of the outsourced activity
Accounting and reporting	No	Luxembourg
Investments	No	Luxembourg
EMIR and SFTR	No	Luxembourg
EMIR and SFTR	No	Switzerland
IT	Yes	France

Activity type	Intra-group outsourcing	Country of performance of the outsourced activity
Risk management function	Yes	France
Accounting and reporting	Yes	France
AML/CFT function	Yes	France
Compliance function	Yes	France
Complaints handling	Yes	France
Claims handling	Yes	France
Distribution	Yes	France
Underwriting	Yes	France
Actuarial function	Yes	France

3.8 - Adequacy of the system of governance

The Company assesses its system of governance as adequate taking into account the nature, scale and complexity of the risks inherent in its business.

3.9 - Any other information

Reference is made to previous sections mentioning the significant changes in the Group's structure and organisation.

4. RISK PROFILE

4.1 - Underwriting risk

Underwriting risk is the risk of loss arising from insurance contracts underwritten by the Company. It arises from the following sources:

Lapse Risk

Lapse Risk comprises the risk of loss arising through higher levels of policyholder lapses than expected on contracts underwritten by the Company. It may be concentrated where a large number of policyholders are serviced by a small number of distributors, and where the focus on HNWI leads to fewer but larger premium receipts and corresponding surrenders.

The Company accepts that in the short to medium term it will be significantly exposed to lapse risk and in particular as it implements its strategy to build relationships with a wider range of product distributors. In designing its products and processes the Company will take steps to limit direct exposure to lapses. The Company has a low appetite for lapse risk.

Mortality Risk

Mortality Risk is the risk of loss arising through higher levels of policyholder deaths than expected on contracts underwritten by the Company.

For the historic OneLife portfolio, the scale of life cover in the Company's policies is relatively low, and is mitigated with reinsurance to achieve low levels of risk retention, in line with the Company's low appetite for mortality risk.

For the historic APICIL life portfolio, no reinsurance is taken and the Company takes the mortality risk with Group guidance. The current amount additional death cover is EUR10.0m and therefore the amount of mortality risk exposure is limited.

Longevity Risk

Longevity Risk is the risk of loss arising to the Company through policyholders surviving for longer periods than expected. It is a risk most typically associated with annuity business, but can be present in other types of business. The Company currently has no appetite for writing further direct longevity risk beyond that represented in its closed books.

Expense Risk

Expense risk is the risk of loss arising through increases in the Company's expense levels, or inflation over time. Expense risk is a significant risk for the Company, and one which it must accept in order to write business. The Company will monitor expense experience on an on-going basis and has set limits for actual expenses relative to budgeted expenses The Company has a low appetite for expense risk.

Life Catastrophe Risk

This relates to the risk of losses arising due to mortality risk exposure from extreme or irregular events whose effects are not sufficiently captured by the Mortality Risk Limits. The Company has a low tolerance for exposure to Life Catastrophe Risk and through product design and reinsurance will ensure that any exposure remains within the limits identified.

Risk on Mix Euro/UL in the collection of the Branch portfolio

This relates to a deviance of collection versus expected one as defined in the Business plan.

Arbitrages/switches in the Branch portfolio

This relates to not realizing the transfers of Savings to Unit linked as expected in the Business plan, resulting in increased Euro Funds portfolio versus what was expected and so distorting the portfolio balance.

4.2 - Market risk

Market Risk is the risk of loss resulting from fluctuations in the level of market prices of assets, liabilities and financial instruments.

Control is exercised depending on the portfolio respectively through the Investment Committee or at APICIL Group level for the branch portfolio.

OneLife's appetite for Market Risk has two key elements – a policyholders' fund element and a shareholders' fund element:

In respect of policyholder funds, the Company has no appetite for direct Market Risk, and future products issued out of Luxembourg will be designed such that no guarantees will be provided which will directly expose the Company to Market Risk. The existing guaranteed portfolios have some inherent risk that is managed with a robust asset liability matching overseen by the Investment Committee, the appetite for this residual risk is low.

The branch in France issues products with guarantees that expose the Company to Market Risk. The mitigation actions are performed with asset allocation and market risk monitoring at APICIL Group level. This entails also determining lower technical rates and benefit participation on those products in case of adverse situation.

The Company earns fee income based on the value of policyholder funds, and therefore will accept Market Risk at this second order level. Control is exercised depending on the portfolio respectively through the Investment Committee or at APICIL Group level over the investments permitted to be held in policyholder portfolios.

In respect of the shareholder portfolio, the Company has a low appetite for Market Risk. The Company will invest primarily in lower risk assets, such as cash, conservative investment funds and fixed interest securities. However, the Company is willing to take on some risk, through allowing to invest in non-government fixed interest securities with a view to generating additional returns, subject to specific limits contained in the Investment Policy set by the Company's Investment Committee. These limits are designed to keep the Company's direct market risk within the risk tolerances set out in this document, and will be reviewed as appropriate in light of any changes to this document.

It can take the form of:

Interest Rate Risk

IInterest Rate Risk is the risk of loss resulting from adverse changes in interest rates. The Company is exposed to Interest Rate risk through direct holdings of fixed interest securities supporting guaranteed funds, through shareholder investment in bonds and bond funds and through the second order impact of changes in interest rates on policyholder funds. The Company for its historical portfolio has a low tolerance for direct interest rate risk and has determined an investment policy for shareholder and guaranteed funds on that basis.

Capital Market Risk

For OneLife, Capital Market Risk primarily relates to the risk of loss resulting from fluctuations in the market prices of equities and other market priced assets. The Company has no tolerance for direct equity or asset exposure other than where an exposure is required for operational reasons through a temporary shareholder holding in unit funds, either as a box position or for seeding funds, for which the appetite is low.

The Company accepts Capital Market Risk through the second order exposure to policyholder unit funds (through fee income). This is part of the business model and at Global Risk Assessment Profile and Evaluation (GRAPE) level, this risk is accepted.

Risk Limits for Capital Market Risk are set out in the Risk Appetite Statement.

Foreign Exchange Risk

Foreign Exchange Risk is the risk of loss resulting from adverse movements in currency exchange rates.

The Company has a low tolerance for Foreign Exchange Risk. The risk appetite of the Company is compatible with writing business in territories where the Euro is not the local currency. However, it is likely that policyholder requirements will mean that the Company will earn fee income in non-Euro currencies whilst typically incurring at least some expenses in Euro.

The Company has a low tolerance for some level of Foreign Exchange Risk, primarily for operational purposes, but has determined overall limits for aggregate currency exposures within which it must operate.

These Risk Limits are set out in the Risk Appetite Statement.

For the branch, the main Market risks are related to:

Variable assets /shares portfolio risk

Share risk is the potential significant negative market impact on the value of eligible assets and own funds.

This could also result in setting-up specific provision affecting the result and guaranteed rates. For Unit Linked, a reduced value of assets results in reducing the future margin of the Company and its own funds. In addition, a significant drop of the shares' market value, switches from Unit linked to Euro Funds business could disturb the realisation of the strategy and impact the reduction of its solvency ratios.

This risk is mitigated by setting-up thresholds on exposures per portfolio, being defined to manage the risk in the frame of the agreed strategy. These thresholds are followed-up on a monthly basis. Alerts are reported when indicators reach 90% of the threshold and mitigating actions are then initiated to avoid crossing over the thresholds.

Absorbing the impact via contribution to benefits also allows reducing the impact.

Spread risk

Spread risk is the potential impact of an increase of the credit spread on own assets. It is assessed as the spread between the actuarial rate of a company's bond and a theoretical sovereign debt (without risk) with similar maturity.

When markets are nervous, the credit spreads on bonds can increase what can lead to deterioration of market value of these bonds reducing the own funds and solvency ratio. This has also an impact on the counterparty risk, potentially requiring additional provisions affecting the result and guaranteed rates portfolio.

Strategic review and allocation (through specific limits/thresholds) by category at the level of the entity does circumvent this risk. Setting limits on concentration of issuers also reduces the risk

Absorbing the impact via contribution to benefits also allows reducing the impact.

Concentration risk

Concentration Risk is the potential risk of overweighting one single business segment in own assets. It also includes concentration risk on issuers and geographical areas. This can result in reduced market value of related investments and impact the results of the Company. This is considered as an important risk for the branch business mainly for what relates to insurance and financial business segment. The banking and financial sector has to be considered as a unique systemic risk as evidenced by the 2008 and 2011 financial crisis which resulted in massive issues on liquidities. A dedicated follow-up of the sector risk is done on a monthly basis via numerous financial indicators. Thresholds on the concentration in banking and financial business segment have been put in place and are followed-up on a monthly basis.

In order to mitigate such risk, the Company diversified and diluted its investments through maximum exposures on issuers, business segments, etc.

4.3 - Credit risk

Credit Risk describes the risk of loss resulting from fluctuations in the credit standing of issuers of securities, counterparties and debtors to which the Company is exposed. It can take the form of:

- Investment Counterparty Risk
- Reinsurer Counterparty Risk
- Policyholder Counterparty Risk

Investment Counterparty Risk

Investment Counterparty risk reflects the risk of loss arising from a counterparty defaulting and being unable to fully discharge an obligation to the Company, and/or spread risk. It will typically include counterparties to fixed interest securities, and other parties that the Company is exposed to, consideration is also given to intra-Group exposures and financial deposits or current accounts

The Company has a medium-low appetite for investment counterparty risk and has set specific limits in the Investment Guidelines Policy, which must be adhered to in relation to investments held directly in shareholder funds. The risk of default on investments in unit-linked funds is passed to policyholders and the risk to the Company is a second order effect driven by a reduction in fee income.

The Company will monitor exposures to relevant third parties. The Company has determined Risk Limits for Investment Counterparty Risk exposures, and will actively monitor these exposures to ensure that they remain within these limits.

Spread risk is treated as a sub-risk of Investment Counterparty Default Risk and relates to the risk of loss arising from changes in the value of market securities driven by changes in the credit standing of counterparties. For OneLife, the risk manifests itself primarily through the shareholder portfolio of fixed interest investments and the guaranteed portfolio. Changes in the credit spreads of fixed interest counterparties (whether corporate or sovereign) will affect the value of those assets.

The Company has a low tolerance for spread risk and has set out a defined Investment Policy to limit exposure by credit rating and concentration limits of counterparties.

Risk limits for the Company's exposure to spread risk are set out in the Company's Investment Policy reviewed at least annually in the context of these risk limits.

Reinsurance Counterparty Risk

Exposures to re-insurers will be monitored as appropriate, and the Company will apply defined limits reporting to the Board. The Board's tolerance to Reinsurance Counterparty Risk is low.

The majority of reinsurance for the main establishment portfolio of OneLife is placed with Munich Re (over 90%). This does not generate a significant concentration of reinsurer credit risk due to the risk premium structure of the reinsurance, which does not cause significant reserves to build up on the reinsurer's balance sheet. Credit risk is therefore limited to claims incurred but not yet reimbursed by the reinsurer, and to accrued profit share not yet received.

The branch portfolio is not reinsured.

Policyholder Counterparty Risk

On occasions, some policyholder funds have issues to liquidate part of the holding to meet fees due, and this creates an exposure for OneLife. The Board expects these exposures to be minimised and action for recovery taken at the earliest opportunity, hence their tolerance for this risk is low.

4.4 - Liquidity risk

LLiquidity Risk is the risk of losses in the event that insufficient liquid assets are available to meet the cash flow requirements of the obligations to any counterparties, such as employees, service providers and policyholders in respect of surrenders when they fall due.

This can be caused by:

- Lack of short term resources to face cash-outs
- Incidents from treasury/liquidities management tools
- Incident with a third party bank

The Company has a low tolerance for liquidity risk. Robust modelling of medium term liquidity needs is completed as part of the annual planning exercise and a safety margin is maintained for short-term liquidity based on recent experience of cash demands. The investment of shareholder funds backing the guarantee funds must be in line with the Asset and Liability Matching Policy which takes account of the Company's projected liability profile, including the projected duration of liabilities, with assets backing policyholder liabilities suitably matched by duration. Furthermore guidelines and monitoring are in place for the policy advance made on former the branch portfolio.

The Company's Investment Policy Guidelines for shareholder funds requires investment in liquid assets which are listed on recognised markets. Where unlisted assets, or other assets which may have less liquidity than typical listed assets, are held within unit funds, the Company will clearly set out the basis for transferring those assets back to policyholders if claims are made on a policy at a time when the assets cannot readily be realised.

The Company's Investment Committee will determine the eligibility of assets or types of asset into unit funds on a case-by-case basis, where the automatic criteria for inclusion in the fund, determined by the Investment Committee, have not been met.

OneLife also monitors the ratio of shareholders' cash at bank, in hand, unused facilities and cash deposits divided by Expenses (monthly average).

The balances of miscellaneous cash accounts are monitored on a daily basis.

For the branch, a rating on liquidity has been developed within the APICIL Group to grant a score for each asset. In terms of its level of liquidity being defined as the average delay to confirm a quote/price on an institutional scale. Liquidity limits have been defined for each portfolio in alignment with related liabilities commitments.

Sinistrality peaks are estimated as well as potential movements resulting from expenses and claims by the business segments in the frame of risks chart. Within the branch, potentials out-flows from Euro Fund business are estimated in case of massive claims/surrenders based on historical data. It is concluded that the available liquid assets do significantly cover such massive claim scenario.

The Company writes only a small amount of regular premium business and those future recurring premiums have been considered outside the contract boundaries for the valuation of technical provisions. The Company does not take credit for any material expected profit included in future premiums.

4.5 - Operational risk

Operational Risk is the risk of loss resulting from inadequate or failed processes, people and systems or from external events.

The Company has a medium-low appetite for Operational Risk, but sees it as an inevitable corollary of writing insurance business. The Company will seek to minimise operational risk through a robust operational risk management process.

The Company has an operational risk policy and uses a three-level categorization of Operational Risk Events:

- **Level I:**
  Seven different event types are defined, in line with the Basel II definitions.
- **Level II:**
  For each Level I event type, Level II event types are developed to provide more detail on the type of the event to answer the question "what has happened?". The Level II event types are closely related to the Basel event types, but some adjustments were made for the application to the insurance industry.
- **Level III:**
  Facilitates the categorization by giving more concrete examples that add to level II and I. Supports the analysis of reported losses by various stakeholders.

The operating model is described in the Operational Risk policy and the events types on the three levels are listed in Appendix I of the same policy.

Furthermore the services outsourced to the APICIL Group for the portfolio of the French branch is subject to outsourcing monitoring to limit the operational risks.

The collection of risk event data enables the Company to supplement the risk information provided by the risk assessment process undertaken by business areas.

4.6 - Stress Testing

In its 2020 ORSA, the Company has considered a number of stresses to quantify key sensitivities in the following areas:

	Stress
1.	Sales risk
2.	Lapse risk
3.	Market Fall
4.	Expense risk
5.	Operational risk
6.	Erosion of fees
7.	Rise in interest rates

Where possible, the Company has aligned the stresses to the APICIL Group ORSA.

Specific interest rate Stress (Stresses 1 and 2) were applied only on the Branch portfolios due to the low remaining guaranteed portfolio in the Company.

When modelling the value of the in-force portfolio in the stressed conditions, we anticipated that management would be able to take some corrective action to reduce future expense levels following a fall in assets under management.

For ease of comparison, dividends were assumed to continue as per the Central Scenario in all of the stresses.

Scenario de Risques Redoutés (SRR)

In addition to the stresses, we considered a combined scenario (Scénario de Risques Redoutés, or "SRR") aligned to the APICIL Group SRR considering the following components:

- Interest Rates
- Equities & spreads
- Sales
- Expenses
- Lapses
- Dividends
- Counterparty Default

Additional Scenarios

Further, the Company considered a Reverse Stress Test to quantify a scenario in which the Company's solvency position would be such that the Company's business model would no longer be viable. The scenario is as per Group SRR.

The Company additionally considered an Economic Growth scenario, with positive UL market evolution, increased expense inflation, higher interest rates and operational losses.

4.7 - Other material risks

Product Design and Pricing

New business pricing risk is the risk of losses arising from accepting new business premiums at unprofitable rates. It is an important risk for the Company to monitor. Whilst it may be important for the Company to write business on competitive terms, and there may be occasions where it is appropriate to apply special terms, the Company has no appetite for writing unprofitable business more generally. Review of issued policies is performed on a regular basis and should business have been written at unprofitable terms, reporting is made to the Executive Committee for actions and / or decision. The analysis is based also on the Expense analysis performed that allocates the expenses in accordance with the different activities. From this analysis a product target pricing is derived.

The process for minimising new business pricing risk requires the profitability of new product developments to be assessed by the Head of Actuarial. Exception requests in respect of individual cases or sub-products are coordinated by Sales & Marketing and must be approved by the Actuarial Team. In case of disagreement, the pricing exception is submitted to the CEO for decision. Periodic reviews of the current pricing of existing products are undertaken at a portfolio level.

The New Business Product Approval process has been revised in light to the Insurance Distribution Directive (IDD). Itis not strictly a risk in its own right, but is a key control. A robust product approval process is central to ensuring that the Company does not inadvertently accept new risks or otherwise increase its risk profile.

Risk Concentration

Within OneLife (head office), risk concentration is monitored and controlled at Shareholders cash balance level: any excessive exposure due to high concentration of shareholder investments in a single entity or Company of related entities, or in a single geographic location or industry are all prescribed with Investment Policy Limits and reported monthly to the Investment Committee.

Consolidated shareholders cash balance per Bank on a Company level is reported by Treasury. Concentration limits for exposures to individual banking companies, are set to minimise the outcome of counterparty defaults.

In addition, the Risk concentration is monitored and controlled at partner level: OneLife developed Key Risk Indicators in order to monitor Broker, Sales person and Custodian concentration.

Sales Risk

Sales risk, is the risk of not reaching the budgeted sales figures or having a surrender rate higher than expected. This risk is monitored each month.

Legal, Regulatory & Compliance Risk

Legal/regulatory (compliance) risk is the impact arising from failure to comply with statutory or regulatory obligations. OneLife considers legal risk as the outcome of other risks crystallising, in particular operational risk. The Company has no appetite for material legal / regulatory risk and will invest in people, systems and governance controls to minimise the possibility of failing to meet legal and regulatory obligations.

Strategic Risk (including Reputational Risk)

The Company is subject to Strategic Risks which are beyond its control, the impact of which may be to render the Business Model unviable. An annual exercise of Reverse Stress Testing has been undertaken by the Executive Committee and presented to the Board for their consideration of events which could have such an impact. A key output from the process is to ensure appropriate early warning measures are in place and that Management actions have been considered and documented should such events arise.

The Company has a low appetite for unprofitable classes of business arising from strategic positioning, or resulting from adverse pricing experience.

Reputational risk is the current and prospective impact on earnings and solvency capital arising from negative opinions exhibited by the public, regulators or tax authorities. Reputational risk can be seen as arising from other risks, in particular operational risk ("cascading effect"). It is considered one of the effects of operational risk events.

The Company has no appetite for reputational risk.OneLife continues to invest heavily in building in its chosen markets and in developing the necessary systems and controls to minimise reputation risk.

One area where Reputation Risk can arise relates to policyholder expectations which can be driven in part by product literature and the sales process. The Board is responsible for ensuring that the reasonable expectations of policyholders are met.

In addition, the Company will carefully select the distributor companies with which it will enter into distribution agreements and will verify the regulatory status of all agents, and where appropriate, implement a programme of on-going sales monitoring in all jurisdictions, and field visits / audits to ensure proactive monitoring of the activities of agents.

A revision of the 4-year strategic plan has been initiated by the Company alongside the Group with the Horizon 2024 project. This conclusion of the revision of the strategic plan has been conducted in 2020 and is expected to be approved by the Board of Directors in Q1 2021.

4.8 - Prudent Person Principle

The prudent person principle for investment purposes is covered through the regular monitoring of the Investment Committee that applies for the own portfolio and portfolios with guarantee return.

OneLife believes that prudent management of risk is a central element of the investment function and that diversification among asset classes will maximize the probability of achieving investment goals while minimizing the risk of loss associated with any single security, asset class, industry sector, or geographical region.

For the historical portfolio of OneLife, the Investment Committee oversees and guides the investment process and its policies subject to the following principles:

- To act solely in the interest of OneLife, its clients, and its shareholders
- To act with care, skill, prudence and diligence under any circumstances
- To prudently manage the costs of implementing this Investment Policy.

This is fully documented in the Company Investment Policy Guidelines

For portfolios where policyholders bear the investment risk, the decision about the asset classes are determined by the policyholders and/or their advisors. The Company ensures that those decisions comply with their investment strategies and with regulatory-determined investment limits.

The monitoring of the former branch portfolio is made at APICIL Group level.

4.9 - Any other information

As at 31 December 2020, the Company has commitments amounting to EUR 1,616,600 (2019: EUR 1,909,625) in relation to IT hardware, software and IT contractors, commitments amounting to EUR 534,628 (2019: EUR 872,635) in relation to car leasing contractors and commitments amounting to EUR 1,350,779 (VAT included) in relation to building lease (2019: EUR 2,365,654).

5. VALUATION FOR SOLVENCY PURPOSES

5.1 - Assets

As at 31 December 2020, The OneLife Company held the following assets:

Balance sheet: Assets (mio EUR)	Notes	Statutory accounts valuation	Solvency II valuation
Intangible assets	**a**	**3.53**	**0.00**
Investments		**469.69**	**519.64**
Shares, other variable yield transferable securities and units in unit trusts	b	79.77	87.49
Debt securities and other fixed income transferable securities	c	356.30	398.52
Other loans	d	27.12	27.12
Deposits with credit institutions	d	6.50	6.50
Investments for the benefit of life insurance	**e**	**7,299.49**	**7,299.49**
Debtors	**f**	**23.76**	**21.74**
Other assets		**93.62**	**93.62**
Cash at bank and in hand	g	93.49	93.49
Tangible assets and stocks		0.13	0.13
Any other assets, not elsewhere shown	**h**	**6.70**	**2.85**
Deferred acquisition costs	**i**	**7.88**	**0.00**
Total assets		**7,904.68**	**7,937.34**

The valuation principles applied to the assets are as follows:

a. For the Statutory Accounts, intangible assets are composed of goodwill (recognised as a result of the acquisition in 2015 of 100% of the shares of Altraplan Luxembourg S.A. and amortised over an eight-year period), establishment charges (which are amortized on a five years basis) and technical policy management and other software costs, which are valued at purchase price including the incidental expenses, less cumulated depreciation amounts and amortized over a seven, five or three years period. For Solvency II, intangible assets are taken at nil value.

b. For the Statutory Accounts, shares and other variable yield transferable securities and units in unit trusts are valued at historical acquisition cost or market value. For Solvency II, they are valued at market value.

c. For the Statutory Accounts, debt securities and other fixed income transferable securities are valued at amortised cost. For Solvency II they are valued at market value.

d. Deposits with credit institutions and other loans are valued at nominal value.

e. Investments for the benefit of life insurance policyholders who bear the investment risk are valued at market value.

f. Debtors are valued at the lower of their nominal and their probable realisation value. Value adjustments are made when recoverability is questionable, either in part or entirely. These value adjustments shall no longer be carried when the reasons for which they were made cease to apply. For Solvency II purposes, a value adjustment was applied in respect of EUR 2.02M of debtors representing prepaid software and application development costs, which were taken at nil value.

g. Cash at bank and in hand is valued at nominal value.

h. Any other assets include other expenditure incurred during the financial year which relates to a subsequent financial year and income relating to the current financial year, but which is not receivable until a subsequent financial year. For Solvency II, this item excludes accrued interest on debt securities, which is instead included in the "Debt Securities and other fixed income and transferable securities" line.

i. For Statutory Accounts, some acquisition costs relating to life insurance policies are deferred and recognized as an asset. The deferred acquisition costs are amortised over the acquisition charge earning period, on a straight line basis. Additional amortisation is recorded on fully surrendered policies. For Solvency II, deferred acquisition costs are not recognized as an asset and are taken at nil value.

5.2 - Technical provisions

Overview

The value of technical provisions under Solvency II requirements equals the sum of the Best Estimate Liability (BEL) and the Risk Margin (RM). The BEL is the expected present value of the probability-weighted average of future cash flows, using the relevant risk-free interest term structure.

The Risk Margin (RM) represents the cost of holding the Solvency Capital Requirement (SCR) over the lifetime of the insurance obligations. It is calculated with a "cost of capital" approach by applying the cost of capital rate to the discounted value of the projected SCR.

Summary of Amounts of Technical Provisions

The amounts of technical provisions as at 31 December 2020 for the purposes of financial statements and Solvency II are as follows:

Balance sheet: Liabilities (mio EUR)	Notes	Statutory accounts valuation	Solvency II valuation
Main Establishment Portfolio			
Unit Linked Technical Provisions	a	5,685.74	5,558.57
Technical Provisions excluding Unit Linked	b	11.81	11.46
Risk Margin	c	0.00	32.32
Main Establishment Portfolio Technical Provisions		**5,697.55**	**5,602.35**
Branch Portfolio			
Unit Linked Technical Provisions	d	1,613.76	1,572.43
Technical Provisions excluding Unit Linked	d	427.69	468.59
Risk Margin	e	0.00	18.31
Branch Portfolio Technical Provisions		**2,041.45**	**2,059.33**
Total Technical Provisions		**7,739.00**	**7,661.69**

a. Main Establishment Portfolio Unit Linked Technical Provisions

The portfolio mainly comprises single premium (with possible additional premiums) and regular premium unit-linked policies allowing investment into a range of internal or external collective funds which the Company makes available, or to one or more dedicated funds where the policy value is linked to an individual investment fund whose assets are managed according to the investment strategy selected by the policyholder.

Unit Linked Technical Provisions correspond to liabilities for those policies, for which the benefits are determined by reference to the value of the investments and where the investment risk is borne by the policyholders.

For the Statutory Accounts, they were evaluated as the net asset value of units allocated to policies on the valuation date, with assets taken at their market value.

For Solvency II, the value of technical provisions was determined by evaluating a Best Estimate Liability (BEL) by projecting forward the cashflows expected to arise from policies in-force at the valuation date on a best-estimate basis and discounting those cashflows using the risk-free rates provided by EIOPA.

Cashflows were modelled on a policy-by-policy basis for 98% of the portfolio, with the remainder being modelled using a model point approach for groups of contracts possessing similar technical characteristics. Cashflows included in the projections were:

- management fees, rebates and other fees and charges;
- claims (mortality, surrender and maturity);
- maintenance expenses;
- trail and renewal commissions.

The Company did not apply the matching adjustment, volatility adjustment, transitional risk-free interest term structure or transitional deduction referred to in, respectively, Articles 77b, 77d, 308c and 308d of the Solvency II Directive.

The BEL was calculated net of reinsurance with adjustment for the expected net profit from reinsurance profit share arrangements.

At the valuation date, amounts recoverable from reinsurance contracts were limited to recoveries due in respect of claims paid and reimbursements due under reinsurance profit share arrangements.

The assumptions about incomes and expenses were determined on the basis of internal observations and analysis, made separately for each part of the modelled portfolio. The probabilities of lapse were determined based on the observations made over the previous three years.

The principal assumptions were as follows:

Economic assumptions	
Risk free rates	EUR Risk free zero coupon curve as at the valuation date provided by EIOPA
Risk discount rates	Equal to the risk free rates
Fund growth rates	Equal to the risk free rates
Currency rates	All cash flows were converted to EUR using rates published by the ECB as at the valuation date
Demographic assumptions	
Surrender Rates	Surrender rates were based on an average of the last 3 years' experience prior to the valuation date, derived on an amounts basis per product grouping.
Mortality	Unit-linked products: 70% of the Belgian MK/FK92 tables. Annuities: 67.8% of the French TGF05/TGH05 tables.
Expense Assumptions	
Maintenance Expenses	Expense assumptions were derived from an analysis of Company expenditure over the 12 months prior to the valuation date. The analysis allocated expenses by type (acquisition, maintenance) and by product grouping. Expenses were modelled predominantly on a per-policy basis, which implicitly assumes a going concern approach.
Expense Inflation	1.6% p.a. (2020), unchanged from the previous valuation.
Fund Management Assumptions	
External Fund Management Charges	Based on fund data applicable at the valuation date.
Trail Commissions	Based on trail commission arrangements in place at the valuation date.
Investment Fund Rebates	Based on retrocession arrangements in place at the valuation date.
Product Specific Assumptions	
Charges	Management charge rates were taken from policy data extracts from the administration systems.

b. Main Establishment Portfolio Technical Provisions excluding Unit Linked

The Company's historical business includes a number of guaranteed fund products mainly written on the Danish market. The remaining *Taux Minimum Garanti* (TMG) and Taux Regulier Garanti (TRG) funds, mainly written on the Belgian market, terminated during 2020.

For both the Statutory Accounts and Solvency II, the technical provisions were calculated as the sum of:

- the number of units allocated to policies, multiplied by the price at the valuation date;
- strengthening reserves, determined by revaluing liabilities on a market-consistent basis.

A number of additional provisions are also included, relating to a small number of traditional annuities and, for the financial statements, to mortality and disability.

c. Main Establishment portfolio - Risk Margin

The market risk component of the SCR was excluded from the calculation, by assuming that the assets are selected in such a way that they minimise the SCR for market risk, in accordance with Article 38 (1) (h) of the Delegated Regulation.

Guideline 62 of the EIOPA guidelines on the valuation of technical provisions sets out a hierarchy of simplifications for the risk margin. For the Main Establishment portfolio, the Company uses method 2 (the second most precise method) where the SCR for each future year is proportional to the ratio of the best estimate for the relevant year to the best estimate at the valuation date. For that purpose, the best-estimate was assumed to evolve in proportion to the projected assets under management of the in-force portfolio.

The projected SCR at each future time period was then discounted back to the valuation date using risk free rates. The result of the calculation was then multiplied by the cost of capital rate of 6% to give the Risk Margin.

d. Branch portfolio - Best Estimate Liability

- The Solvency II technical provisions were calculated according to a stochastic method: 1000 simulations were carried out, for modelling equity, inflation, real estate and yield curve indices.

e. Branch portfolio - Risk Margin

The risk margin was determined using the formula:

$CoCM = (CoC/(1+r_1)) \bullet Dur_{mod}(0) \bullet SCR_{RU}(0),$

where:

SCR_{RU} (0)	SCR au 31/12/2020, without taking into account the SCR Market Risk and adjustment for deferred taxes
CoC	Cost of capital rate
Dur_{mod}	the modified duration of insurance liabilities

This uses method 3 (the duration-based approach) of the hierarchy of simplifications proposed by EIOPA.

The Company has performed the necessary due diligence taking into account its risk profile in order to justify the use of this method.

f. Branch portfolio – Volatility Adjustment

The valuation of the Solvency II technical provisions of the Branch portfolio takes into account the Volatility Adjustment (VA).

The application of the VA involves the following impacts as of 31/12/2020:

	€m
Amount of technical provisions	-1.7
Solvency Capital Requirement	-1.0
Minimum Capital Requirement	-0.3
Basic Own Funds	1.2
Eligible Own Funds to cover the MCR	1.2
Eligible Own Funds to cover the SCR	1.2

Uncertainty associated with the value of the technical provisions

The value of the technical provisions at the valuation date is highly sensitive to the assumptions underlying the calculation of the Present Value of Future Profits (PVFP) and, in particular, to the assumptions of future lapse experience, maintenance expenses, investment fund rebates, trail commissions and investment performance and discount rates.

The evolution of technical provisions is also highly sensitive to the development of assets under management, which is itself sensitive to market performance, levels of new business written and lapse experience.

Differences from the Statutory Account valuation & Other Information

A comparison of the technical provisions for the purposes of the financial statements and Solvency II has been shown in the table above.

The differences arise from the inclusion of the PVFP and the Risk Margin in the Solvency II technical provisions.

No securitisation arrangements were in place.

5.3 - Other Liabilities

The amounts of other liabilities as at 31 December 2020 for the purposes of the financial statements and Solvency II are as follows:

Balance sheet: Other Liabilities (mio EUR)	Notes	Statutory accounts valuation	Solvency II valuation
Subordinated Liabilities	a	**6.94**	**7.46**
Provisions for other risks and charges	b	**7.08**	**7.08**
Provisions for taxation		2.64	2.64
Other provisions		4.44	4.44
Creditors	c	**49.44**	**49.44**
Accruals and deferred income	d	**0.60**	**0.60**
Deferred Tax liabilities	e	**-**	**8.63**
Total of other liabilities		**64.06**	**73.21**

a. For Solvency II, subordinated loans were valued by discounting payments of interest and capital at risk-free interest rates. The basis differs from that used in the statutory accounts, which valued subordinated liabilities at nominal value.

b. Provisions for other risks and charges include the provisions for taxation and the other provisions.

   The provisions for taxation include the Company's best estimate of income tax liabilities for financial years for which a definitive taxation assessment has not yet been received from the fiscal authorities and final unpaid tax liabilities. Advance tax payments are recognized under the category "Any other assets".

   The other provisions are intended to cover losses or liabilities the nature of which is clearly defined and which, at the balance sheet date, are either likely to be incurred or certain to be incurred, but uncertain as to the amount or as to the date on which they will arise.

c. Creditors are valued at settlement value for both the Statutory Accounts and Solvency II.

d. Accruals and deferred income consist of both income received before the balance sheet date, but relating to a subsequent financial year, and charges relating to the current financial year, but payable in a subsequent financial year. They are valued at settlement value for both the Statutory Accounts and Solvency II.

e. For the purposes of Solvency II, an amount of **EUR 8.63M** was determined for the value of Deferred Tax Liabilities (DTL). This amount is presented net of relief from carried forward tax losses. The amount was calculated by applying the relevant tax rate for the company (28.69%) to the result of:

	(i)	Capital & Reserves on the Solvency II basis
less	(ii)	Capital & Reserves on the Financial Statements Basis
less	(iii)	Amount of tax losses carried forward

   subject to a floor of zero.

   The DTL was an amount of **EUR 31.41M** prior to allowing for the **EUR 22.78M** benefit from carried-forward tax losses.

5.4 - Alternative methods for valuation

The Company has not used alternative methods of valuation under Article 10(5) of the Delegated Regulations.

5.5 - Any other information

The Company has no further material information to disclose regarding the valuation of assets and liabilities for solvency purposes.

6. CAPITAL MANAGEMENT

6.1 - Own Funds

6.1.1 Capital Management Process

The objective of the capital management process is to ensure that the nature and amount of Own Funds are sufficient to meet regulatory capital requirements (i.e. the Solvency Capital Requirement and Minimum Capital Requirement) at all times.

To achieve this, the Risk Appetite Statement sets out a minimum target coverage ratio and also an internal minimum ratio.

The capital management process is summarised in the Capital Management Policy and includes the following key items:

- An annual Budget and Medium Term Capital Management Plan, carried out annually in the 4th quarter with a five-year time horizon and which takes into account different scenario hypotheses and any planned dividends or capital restructuring. A forecast exercise is also run quarterly, taking into account expected year-to-date performance.
- Stress and scenario analysis conducted within the ORSA process and summarised in the ORSA Report, which is used as an input to the Medium Term Capital Management Plan.
- The process for approval of any dividends or distributions of capital.
- Processes for simulating the solvency impact of planned new activities.
- Roles and responsibilities of the Actuarial Function, Group Executive Committee, ARCC and Board of Directors in the monitoring of capital adequacy on at least a quarterly basis.
- Processes to allow the Company to effectively manage a crisis situation that might lead to a capital shortfall against regulatory requirements or risk appetite.
- The roles of the CFO and the Investment Committee in managing and monitoring the investment of Own Funds.

6.1.2 Tiering and Quality of Own Funds

The following table shows the eligible amount of Own Funds to cover the SCR and the MCR classified by tiers and the corresponding solvency ratios. The amount of Own Funds is shown after taking into account a dividend of €0m to be paid in 2021 to OLH in respect of 2020 earnings.

Own Funds (mio EUR)	Solvency II value	Tier 1 - Unrestricted	Tier 1 - Restricted	Tier 2	Tier 3
31 December 2020					
Subscribed capital	50.20	50.20	-	-	-
Share premium account	18.83	18.83	-	-	-
Reconciliation reserve	133.42	133.42	-	-	-
Subordinated Liabilities	7.46	-	7.46	-	-
Basic Own Funds	**209.91**	**202.45**	**7.46**	**0.00**	**0.00**
SCR	**152.93**				
MCR	**63.69**				
Ratio of Eligible own funds to SCR	**137.3%**				
Ratio of Eligible own funds to MCR	**329.6%**				

For comparison, the Own Funds at the end of the previous reporting period were as follows:

Own Funds (mio EUR)	Solvency II value	Tier 1 - Unrestricted	Tier 1 - Restricted	Tier 2	Tier 3
31 December 2019					
Subscribed capital	50.20	50.20	-	-	-
Share premium account	20.52	20.52	-	-	-
Reconciliation reserve	113.25	113.25	-	-	-
Subordinated Liabilities	7.42	-	7.42	-	-
Basic Own Funds	**191.39**	**183.97**	**7.42**	**-**	**-**
SCR	**137.46**				
MCR	**61.85**				
Ratio of Eligible own funds to SCR	**139.24%**				
Ratio of Eligible own funds to MCR	**309.42%**				

The increase in Own Funds during **2020** was mainly due to:

- an increase in the PVFP of unit-linked policies as a result of higher AUM and favourable assumptions changes, particularly with regard to lapse rates;
- the benefit of a review of the level and the modelling of costs on the Branch portfolio;
- increase in the unrealised gains on the Company's investment portfolios.

a. Subscribed Capital and Share Premium Account

The subscribed capital amounts to EUR 50.20m and is represented by 2,024,843 fully paid and called-up ordinary shares. The share premium account corresponds to an amount of EUR 20.52m.

b. Reconciliation Reserve

The reconciliation reserve, classified as Unrestricted Tier 1, comprises the following items:

EURm	31/12/2020	31/12/2019
Reserves	16.79	15.00
Profit brought forward	10.46	9.71
Profit for the financial year	5.34	1.84
Foreseeable dividend	0.00	(1.00)
Variation in the valuation of assets	32.66	14.41
Variation in the valuation of liabilities	76.80	74.40
Deferred tax liabilities	(8.63)	(1.11)
Reconciliation reserve	**133.42**	**113.25**

The reserves amounting to EUR 16.79m (2019: EUR 15.00m) are composed of the legal reserve of EUR 5.01m (2019: EUR 3.22m) and a free reserve of EUR 11.78m (2019: EUR 11.78m). In accordance with Luxembourg law, the Company allocates 5% of its net profit for each financial year until the legal reserve balance reaches 10% of the issued share capital.

c. Subordinated Liabilities

The Company's Own Funds included the following subordinated loan, valued on a Solvency II basis:

EURm	31/12/2020	31/12/2019
Loan - The OneLife Holding S.à.r.l.	7.46	7.42

Details of the loans are as follows:

- Loan towards The OneLife Holding Sàrl: Subordinated floating rate loan originally issued on 01/03/1995 with unlimited term, now owed to The OneLife Holding S.à.r.l. for a nominal amount of EUR 6.9M.

The loan is subject to the transitional measures set out in Articles 308b(9) and 308b(10) of the Solvency II Directive (consolidated version), which can be applied for a 10-year period for subordinated loans issued before 1st of January 2016. Accordingly, the loan is classified as "Tier 1 – Restricted".

As at both December 2020 and December 2019, the Company had sufficient "Tier 1 – Unrestricted" Own Funds to fully cover its SCR and MCR, without recourse to subordinated liabilities.

d. Ancillary Own Funds, Deductions and Restrictions

The Company has no Ancillary Own Funds, applies no deductions to Own Funds and there are no material restrictions affecting their availability and transferability.

6.1.3 Comparison of Own Funds to Financial Statements

The following table reconciles the Capital & Reserves in the Company's financial statements to the excess of the assets over liabilities as calculated for Solvency II purposes.

Basic Own Funds: Reconciliation of Net Equity with Own Funds (mio EUR)	31/12/20	31/12/19
Total Equity in financial statements	**101.62**	**97.27**
Subscribed capital	50.20	50.20
Share premium account	18.83	20.52
Reserves	16.79	15.00
Profit / (loss) brought forward	10.46	9.71
Profit / (loss) for the financial year	5.34	1.84
Variation in the valuation of assets	**32.66**	**14.41**
Intangible assets	(3.53)	(5.32)
Deferred acquisition costs	(7.88)	(8.25)
Difference of valuation on the assets	44.08	27.98
Variation in the valuation of liabilities	**76.80**	**74.40**
Difference of valuation of the technical provisions	127.95	117.55
Risk Margin	(50.64)	(42.67)
Difference of valuation of subordinated liabilities	(0.52)	(0.48)
Subordinated liabilities (Solvency II basis)	**7.46**	**7.42**
Foreseeable Dividend	**0.00**	**(1.00)**
Deferred tax liabilities	**(8.63)**	**(1.11)**
Basic Own Funds	**209.91**	**191.39**

The difference between the Own Funds and the financial statements net equity arises from the differences between the valuations of assets, liabilities and technical provisions described in the sections above.

For the purposes of Solvency II, the value of Deferred Tax Liabilities was shown net of relief from carried forward tax losses.

6.2 - Solvency Capital Requirement and Minimum Capital Requirement

The table below shows the amounts of the Company's Solvency Capital Requirement split by risk modules.

Solvency Capital Requirement and Minimum Capital Requirement (mio EUR)	31/12/20	31/12/19
Market Risk	**104.75**	**86.60**
Interest Risk	0.98	9.75
Equity Risk	71.02	51.18
Property Risk	3.58	2.64
Spread Risk	30.85	28.11
Currency Risk	15.66	12.84
Concentration Risk	0.00	0.88
Diversification effect	(17.36)	(18.80)
Life Underwriting Risk	**96.03**	**85.38**
Mortality Risk	4.72	2.68
Longevity Risk	0.92	0.86
Disability - Morbidity Risk	0.00	0.00
Lapse Risk	72.90	62.45
Expense Risk	34.59	33.91
Revision Risk	0.00	0.00
Catastrophe Risk	0.66	0.56
Diversification effect	(17.77)	(15.08)
Counterparty Default Risk	**8.30**	**10.11**
Diversification effect	**(47.44)**	**(42.60)**
BSCR	**161.63**	**139.48**
Operational Risk	9.28	9.56
Loss-absorbing capacity of technical provisions	(9.35)	(10.47)
Loss-absorbing capacity of deferred taxes	(8.63)	(1.11)
SCR	**152.93**	**137.46**
MCR	**63.69**	**61.85**

The Company exclusively applies the Standard Formula to determine its Solvency Capital Requirement, without using simplified calculations and without using undertaking-specific parameters.

In accordance with Chapter VII of the Delegated Regulation, the Minimum Capital Requirement calculation is based on the net value of the technical provisions and the total capital at risk on death, evaluated at the reporting date. The result of the calculation is subject to a floor of 25% of the SCR and to a cap of 45% of the SCR.

Capital requirements moved as follows over 2020-2019:

mio EUR	31/12/20	31/12/19
Market Risk	104.75	86.60
Life Underwriting Risk	96.03	85.38
Counterparty Default Risk	8.30	10.11
Diversification effect	(47.44)	(42.60)
Operational Risk	9.28	9.56
Loss absorbing capacity of technical provisions	(9.35)	(10.47)
Loss absorbing capacity of deferred taxes	(8.63)	(1.11)
SCR	**152.93**	**137.46**
MCR	**63.69**	**61.85**

Over the year, the main changes to the SCR were as due to:

- increase in unit-linked AUM, which led to a higher PVFP. As the higher value generates greater sensitivity, this caused an increase in the market and life underwriting components of the SCR ;
- reduction in decrement assumptions led to a longer projected duration and hence greater sensitivity to shocks;
- increase in the mass lapse SCR due to reduction in internal cost assumptions on the Branch portfolio;
- the reduction in the interest rate risk SCR was due primarily to a change in treatment, which was offset by a corresponding movement in the Loss Absorbing Capacity of Technical Provisions (LACTP), the net impact being neutral. The interest rate risk SCR (net of LACTP) was more stable over the year.
- The impact of the loss absorbing capacity of deferred taxes follows the increase in deferred tax liabilities in the Own Funds.

6.3 - Use of the duration-based equity risk sub-module in the calculation of the Solvency Capital Requirement

The Company is not using the duration-based equity risk sub-module (set out in Article 304 of the Solvency II Directive) in the calculation of the Solvency Capital Requirement.

6.4 - Differences between the standard formula and any internal model used

The Company is not using an internal or partial internal model to determine the Solvency Capital Requirement.

6.5 - Non-compliance with the MCR and non-compliance with the SCR

The Company complied with its Solvency Capital Requirement and Minimum Capital Requirement throughout the reporting period.

The Company does not foresee a risk of non-compliance with its Solvency Capital Requirement or Minimum Capital Requirement during its business planning horizon.

The Company plans to ensure compliance with the SCR and MCR by the measures set out in its Capital Management Policy, which include:

- maintaining a sufficient buffer within its Own Funds above the SCR and MCR;
- reviewing the five-year business and Medium Term Capital Management Plan in the 4th quarter of each year, with a reforecast exercise in the 2nd quarter;
- performing a stress and scenario analysis at least annually within the ORSA process;
- reviewing the impact on solvency coverage of any potential dividend or redemption of subordinated loans;
- simulating the solvency impact of planned new activities or monitoring the impact in the change of the perimeter of the company;
- monitoring solvency coverage on at least a quarterly basis, or on occurrence of a significant event.

6.6 - Any other information

None

APPENDICES

A. QRT S.02.01.02
BALANCE SHEET

		Solvency II value	Statutory accounts value
		C0010	C0020
Assets			
Goodwill	**R0010**	**-**	**501 902.39**
Deferred acquisition costs	**R0020**	**-**	7 883 173.33
Intangible assets	**R0030**	-	3 029 364.41
Deferred tax assets	**R0040**	-	-
Pension benefit surplus	**R0050**	-	-
Property, plant & equipment held for own use	**R0060**	132 696.51	130 436.51
Investments (other than assets held for index-linked and unit-linked contracts)	**R0070**	492 512 791.35	446 410 693.61
Property (other than for own use)	R0080	-	-
Holdings in related undertakings, including participations	R0090	-	-
Equities	R0100	5 359.45	-
Equities - listed	R0110	5 359.45	-
Equities - unlisted	R0120	-	-
Bonds	R0130	398 520 450.81	360 145 014.00
Government Bonds	R0140	179 305 953.57	162 039 727.26
Corporate Bonds	R0150	219 206 513.41	198 098 071.71
Structured notes	R0160	7 983.83	7 215.03
Collateralised securities	R0170	-	-
Collective Investments Undertakings	R0180	87 486 981.09	79 765 679.64
Derivatives	R0190	-	-
Deposits other than cash equivalents	R0200	6 500 000.00	6 499 999.97
Other investments	R0210	-	-
Assets held for index-linked and unit-linked contracts	**R0220**	7 299 494 903.10	7 299 494 903.10

		Solvency II value	Statutory accounts value
		C0010	C0020
Loans and mortgages	**R0230**	27 122 810.15	27 122 810.15
Loans on policies	R0240	27 049 274.92	27 049 274.92
Loans and mortgages to individuals	R0250	-	-
Other loans and mortgages	R0260	73 535.23	73 535.23
Reinsurance recoverables from:	**R0270**	-	-
Non-life and health similar to non-life	R0280	-	-
Non-life excluding health	R0290	-	-
Health similar to non-life	R0300	-	-
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	-	-
Health similar to life	R0320	-	-
Life excluding health and index-linked and unit-linked	R0330	-	-
Life index-linked and unit-linked	R0340	-	-
Deposits to cedants	**R0350**	-	-
Insurance and intermediaries receivables	**R0360**	7 507 997.25	7 507 997.25
Reinsurance receivables	**R0370**	115 992.46	115 992.46
Receivables (trade, not insurance)	**R0380**	28 148 377.09	30 168 698.34
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**	93 487 542.83	93 487 542.83
Any other assets, not elsewhere shown	**R0420**	2 855 264.82	2 860 924.30
Total assets	**R0500**	7 951 378 375.56	7 918 714 438.68

A. QRT S.02.01.02
BALANCE SHEET

		Solvency II value	Statutory accounts value
		C0010	C0020
Liabilities			
Technical provisions – non-life	**R0510**	**-**	**-**
Technical provisions – non-life (excluding health)	R0520	-	-
Technical provisions calculated as a whole	R0530	-	-
Best Estimate	R0540	-	-
Risk margin	R0550	-	-
Technical provisions - health (similar to non-life)	R0560	-	-
Technical provisions calculated as a whole	R0570	-	-
Best Estimate	R0580	-	-
Risk margin	R0590	-	-
Technical provisions - life (excluding index-linked and unit-linked)	R0600	483,202 694.32	439,508,796.60
Technical provisions - health (similar to life)	R0610	-	-
Technical provisions calculated as a whole	R0620	-	-
Best Estimate	R0630	-	-
Risk margin	R0640	-	-
Technical provisions – life (excluding health and index-linked and unit-linked)	R0650	483,202,694.32	439,508,796.60
Technical provisions calculated as a whole	R0660		439,508,796.60
Best Estimate	R0670	480,047,556.90	-
Risk margin	R0680	3,155,137.42	-
Technical provisions – index-linked and unit-linked	R0690	7,178,483,493.82	7,299,494,903.10
Technical provisions calculated as a whole	R0700		7,299,494,903.10
Best Estimate	R0710	7,131,003,412.09	-
Risk margin	R0720	47,480,081.73	-
Other technical provisions	**R0730**	-	-
Contingent liabilities	**R0740**	-	-
Provisions other than technical provisions	**R0750**	7,078,874.53	7,078,874.53

A. QRT S.02.01.02
BALANCE SHEET

		Solvency II value	Statutory accounts value
		C0010	C0020
Pension benefit obligations	**R0760**	-	-
Deposits from reinsurers	**R0770**	-	-
Deferred tax liabilities	**R0780**	8,626,964.91	
Derivatives	**R0790**	-	-
Debts owed to credit institutions	**R0800**	-	-
Financial liabilities other than debts owed to credit institutions	**R0810**	-	-
Insurance & intermediaries payables	**R0820**	35,285,088.36	35,285,088.36
Reinsurance payables	**R0830**	-	-
Payables (trade, not insurance)	**R0840**	28,792,233.64	28,792,233.64
Subordinated liabilities	**R0850**	7,456,149.04	6,941,018.69
Subordinated liabilities not in Basic Own Funds	R0860	-	-
Subordinated liabilities in Basic Own Funds	R0870	7,456,149.04	6,941,018.69
Any other liabilities, not elsewhere shown	**R0880**	-	-
Total liabilities	**R0900**	7,748,925,498.63	7,817,100,914.92
Excess of assets over liabilities	**R1000**	202,452,876.93	101,613,523.76

B. QRT S.05.01.02
PREMIUMS, CLAIMS & EXPENSES BY LINE OF BUSINESS

		Line of Business for: life insurance obligations						Life reinsurance obligations		
		Health insurance	Insurance with profit participation	Index-linked and unit-linked insurance	Other life insurance	Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations	Health reinsurance	Life reinsurance	
		C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0300
Premiums written										
Gross	R1410		38,433,504.0	796,322,842.3						834,756,346.3
Reinsurers' share	R1420		0	827,292.0						827,292.0
Net	R1500		38,433,504.0	795,495,550.3						833,929,054.3
Premiums earned										
Gross	R1510		38,433,504.0	796,322,842.3						834,756,346.3
Reinsurers' share	R1520		0	827,292.0						827,292.0
Net	R1600		38,433,504.0	795,495,550.3						833,929,054.3
Claims incurred										
Gross	R1610		47,073,411.0	653,567,614.7						700,641,025.7
Reinsurers' share	R1620		0	312,055.6						312,055.6
Net	R1700		47,073,411.0	653,255,559.1						700,328,970.1
Changes in other technical provisions										
Gross	R1710		-19,020,769.2	276,434,818.8						257,414,049.6
Reinsurers' share	R1720		0	0						0
Net	R1800		-19,020,769.2	276,434,818.8						257,414,049.6
Expenses incurred	R1900		4,293,455.6	73,861,639.7						78,155,095.3
Administrative expenses										
Gross	R1910		1,720,448.2	39,153,402.6						40,873,850.8
Reinsurers' share	R1920									0
Net	R2000		1,720,448.2	39,153,402.6						40,873,850.8

		Line of Business for: life insurance obligations						Life reinsurance obligations		
		Health insurance	Insurance with profit participation	Index-linked and unit-linked insurance	Other life insurance	Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations	Health reinsurance	Life reinsurance	
		C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0300
Investment management expenses										
Gross	R2010		978,404.8	2,331,523.3						3,309,928.1
Reinsurers' share	R2020									0
Net	R2100		978,404.8	2,331,523.3						3,309,928.1
Claims management expenses										
Gross	R2110		294,214.0	6,237,946.2						6,532,160.2
Reinsurers' share	R2120									0.0
Net	R2200		294,214.0	6,237,946.2						6,532,160.2
Acquisition expenses										**0**
Gross	R2210		1,300,388.7	26,138,767.6						27,439,156.3
Reinsurers' share	R2220			0						0.0
Net	R2300		1,300,388.7	26,138,767.6						27,439,156.3
Overhead expenses										
Gross	R2310									0
Reinsurers' share	R2320									0
Net	R2400									0
Other expenses	**R2500**									**14,729,266.7**
Total expenses	**R2600**									**92,884,362.0**
Total amount of surrenders	**R2700**		**47,367,625.0**	**659,805,560.9**						**707,173,185.9**

All amounts are expressed in K EUR

C. QRT S.05.02.01
PREMIUMS, CLAIMS & EXPENSES BY COUNTRY

Country	R0015	BELGIUM	DENMARK	SPAIN	FRANCE	Home country	Total Top 5 and home country
		Country (*by amount of gross premiums written*) - life obligations	Country (*by amount of gross premiums written*) - life obligations	Country (*by amount of gross premiums written*) - life obligations	Country (*by amount of gross premiums written*) - life obligations	Country (*by amount of gross premiums written*) - life obligations	Country (*by amount of gross premiums written*) - life obligations
		C0230	C0230	C0230	C0230	C0220	C0280
Premiums written							
Gross	R1410	276,479,189.5	49,434,794.7	51,438,302.9	262,329,877.9	111,968,794.7	751,650,959.7
Reinsurers' share	R1420	827,291.95	0	0	0	0	827,291.95
Net	R1500	275,651,897.6	49,434,794.7	51,438,302.9	262,329,877.9	111,968,794.7	75,082,3667.8
Premiums earned							
Gross	R1510	276,479,189.5	49,434,794.7	51,438,302.9	262,329,877.9	111,968,794.7	751,650,959.7
Reinsurers' share	R1520	827,291.95	0	0	0	0	827,291.95
Net	R1600	275,651,897.6	49,434,794.7	51,438,302.9	262,329,877.9	111,968,794.7	750,823,667.8
Claims incurred							
Gross	R1610	285,213,817.1	15,809,099.07	154,524,621.8	153,746,742.7	118,695,43.18	621,163,823.9
Reinsurers' share	R1620	287,833.28	0	0	0	0	287,833.28
Net	R1700	284,925,983.8	15,809,099.07	154,524,621.8	153,746,742.7	118,695,43.18	620,875,990.6
Changes in other technical provisions							
Gross	R1710	60,052,867.39	51,375,926.24	-94,938,215.13	79,348,085.06	105,088,988.6	200,927,652.2
Reinsurers' share	R1720	0	0	0	0	0	0
Net	R1800	60,052,867.39	51,375,926.24	-94,938,215.13	79,348,085.06	105,088,988.6	200,927,652.2
Expenses incurred	**R1900**	**21,087,682.89**	**2,343,398.268**	**3,330,844.533**	**28,325,734.32**	**3,993,909.459**	**59,081,569.47**
Other expenses	**R2500**						
Total expenses	**R2600**	**21,087,682.89**	**2,343,398.268**	**3,330,844.533**	**28,325,734.32**	**3,993,909.459**	**59,081,569.47**

C. QRT S.05.02.01
PREMIUMS, CLAIMS & EXPENSES BY COUNTRY

		Home country (LU)	BE	ES	FR	DK	Total
		C0220	C0230	C0230	C0230	C0230	C0280
Premiums written							
Gross	R1410	111,968,795	276,479,190	51,438,303	262,329,878	49,434,795	751,650,960
Reinsurers' share	R1420	-	827,292	-	-	-	827,292
Net	R1500	111,968,795	275,651,898	51,438,303	262,329,878	49,434,795	750,823,668
Premiums earned							
Gross	R1510	111,968,795	276,479,190	51,438,303	262,329,878	49,434,795	751,650,960
Reinsurers' share	R1520	-	827,292	-	-	-	827,292
Net	R1600	111,968,795	275,651,898	51,438,303	262,329,878	49,434,795	750,823,668
Claims incurred							
Gross	R1610	8,249,543	290,213,817	154,524,622	153,746,743	14,429,099	621,163,824
Reinsurers' share	R1620	-	312,056	-	-	-	312,056
Net	R1700	8,249,543	289,901,761	154,524,622	153,746,743	14,429,099	620,851,768
Changes in other technical provisions							
Gross	R1710	105,088,989	60,052,867	-94,938,215	79,348,085	51,375,926	200,927,652
Reinsurers' share	R1720	-	-	-	-	-	-
Net	R1800	105,088,989	60,052,867	-94,938,215	79,348,085	,51,375,926	200,927,652
Expenses incurred	**R1900**	**3,993,909**	**24,870,980**	**3,931,669**	**21,880,904**	**2,763,206**	**57,440,669**
Other expenses	**R2500**						
Total expenses	**R2600**	**3,993,909**	**24,870,980**	**3,931,669**	**21,880,904**	**2,763,206**	**57,440,669**

D. QRT S.12.01.02
LIFE & HEALTH SLT TECHNICAL PROVISIONS

			Index-linked and unit-linked insurance			Other life insurance				Accepted reinsurance						Health insurance (direct business)					
		Insurance with profit participation		Contracts without options and guarantees	Contracts with options or guarantees		Contracts without options and guarantees	Contracts with options or guarantees	Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations		Insurance with profit participation	Index-linked and unit-linked insurance	Other life insurance	Annuities stemming from non-life accepted insurance contracts and relating to insurance obligation other than health insurance obligations	Total (Life other than health insurance, incl. Unit-Linked)		Contracts without options and guarantees	Contracts with options or guarantees	Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Health reinsurance (reinsurance accepted)	Total (Health similar to life insurance)
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180	C0190	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 calculated as a whole	**R0020**																				
Technical provisions calculated as a sum of BE and RM																					
Best Estimate																					
Gross Best Estimate	R0030	480,047,556.9		7,131,003,412											7,611,050,969						
Total recoverables from reinsurance/SPV and Finite Re before the adjustment for expected losses due to counterparty default	R0040																				
Recoverables from reinsurance (except SPV and Finite Re) before adjustment for expected losses	R0050																				
Recoverables from SPV before adjustment for expected losses	R0060																				
Recoverables from Finite Re before adjustment for expected losses	R0070																				
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0080																				
Best estimate minus recoverables from reinsurance/SPV and Finite Re	R0090	48,0047,556.9		7,131,003,412											7,611,050,969						
Risk Margin	R0100	3,155,137.42	47,480,081.73												50,635,219.15						
Amount of the transitional on Technical Provisions																					
Technical Provisions calculated as a whole	R0110																				
Best estimate	R0120																				

			Index-linked and unit-linked insurance			Other life insurance				Accepted reinsurance						Health insurance (direct business)					
		Insurance with profit participation		Contracts without options and guarantees	Contracts with options or guarantees		Contracts without options and guarantees	Contracts with options or guarantees	Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations		Insurance with profit participation	Index-linked and unit-linked insurance	Other life insurance	Annuities stemming from non-life accepted insurance contracts and relating to insurance obligation other than health insurance obligations	Total (Life other than health insurance, incl. Unit-Linked)		Contracts without options and guarantees	Contracts with options or guarantees	Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Health reinsurance (reinsurance accepted)	Total (Health similar to life insurance)
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180	C0190	C0200	C0210
Risk margin	R0130																				
Technical provisions - total	**R0200**	483,202,694.3	7,178,483,494												7,661,686,188						
Technical provisions minus recoverables from reinsurance/ SPV and Finite Re - total	**R0210**	483,202,694.3	7,178,483,494												7,661,686,188						
Best Estimate of products with a surrender option	**R0220**	476,983,187.3	7,131,003,412												7,607,986,599						
Gross BE for Cash flow																					
Cash out-flows																					
Future guaranteed and discretionary benefits	R0230		6,606,915,921												7,055,273,983						
Future guaranteed benefits	R0240	404,285,649.1																			
Future discretionary benefits	R0250	44,072,412.51																			
Future expenses and other cash out-flows	R0260	31,689,495.28	628,692,232.9												660,381,728.2						
Cash in-flows															0						
Future premiums	R0270	0	0																		
Other cash in-flows	R0280	0	104,604,742												104,604,742						
Percentage of gross Best Estimate calculated using approximations	**R0290**	0	0.007,433,423																		
Surrender value	**R0300**	435,834,344.4	7,285,109,044												7,720,943,388						
Best estimate subject to transitional of the interest rate	**R0310**																				
Technical provisions without transitional on interest rate	**R0320**																				
Best estimate subject to volatility adjustment	**R0330**	468,590,960.2	1,572,431,784												2,041,022,744						
Technical provisions without volatility adjustment and without others transitional measures	**R0340**	473,190,914.6	1,587,840,891												2,061,031,806						
Best estimate subject to matching adjustment	**R0350**																				
Technical provisions without matching adjustment and without all the others	**R0360**																				

E - QRT S.22.01 – IMPACT OF LONG TERM GUARANTEES MEASURES AND TRANSITIONALS

		Amount with Long Term Guarantee measures and transitionals	Impact of the LTG measures and transitionals (Step-by-step approach)								
			Without transitional on technical provisions	Impact of transitional on technical provisions	Without transitional on interest rate	Impact of transitional on interest rate	Without volatility adjustment and without other transitional measures	Impact of volatility adjustment set to zero	Without matching adjustment and without all the others	Impact of matching adjustment set to zero	Impact of all LTG measures and transitionals
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100
Technical provisions	R0010	7,661,686,188	7,661,686,188	0	7,661,686,188	0	7,663,384,267	1,698,079.3	7,663,384,267	0	1,698,079.3
Basic own funds	R0020	209,909,026	209909,026	0	209,909,026	0	208,698,125.6	-1,210,900.4	208,698,125.6	0	-1,210,900.4
Excess of assets over liabilities	R0030	202,452,876.9	202,452,876.9	0	202,452,876.9	0	201,241,976.6	-1,210,900.4	201,241,976.6	0	-1,210,900.4
Restricted own funds due to ring-fencing and matching portfolio	R0040	0	0	0	0	0	0	0	0	0	0
Eligible own funds to meet Solvency Capital Requirement	R0050	209,909,026	209,909,026	0	209,909,026	0	208,698,125.6	-1,210,900.4	208,698,125.6	0	-1,210,900.4
Tier 1	R0060	209,909,026	209,909,026	0	209,909,026	0	208,698,125.6	-1,210,900.4	208,698,125.6	0	-1,210,900.4
Tier 2	R0070	0	0	0	0	0	0	0	0	0	0
Tier 3	R0080	0	0	0	0	0	0	0	0	0	0
Solvency Capital Requirement	R0090	152,931,910.2	152,931,910.2	0	152,931,910.2	0	153,976,273.4	1,044,363.3	153,976,273.4	0	1,044,363.3
Eligible own funds to meet Minimum Capital Requirement	R0100	209,909,026	209,909,026	0	209,909,026	0	208,698,125.6	-1,210,900.4	208,698,125.6	0	-1,210,900.4
Minimum Capital Requirement	R0110	63,692,134.87	63,692,134.9	0	63,692,134.9	0	63,952,959.2	260,824.3	63,952,959.2	0	260,824.3

F. QRT S.23.01.01.01
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	50,200,525	50,200,525			
Share premium account related to ordinary share capital	R0030	18,825,232.64	18,825,232.64			
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040	0	0			
Subordinated mutual member accounts	R0050	0				
Surplus funds	R0070	0	0			
Preference shares	R0090	0				
Share premium account related to preference shares	R0110	0				
Reconciliation reserve	R0130	133,427,119.3	133,427,119.3			
Subordinated liabilities	R0140	7,456,149.043		7,456,149.043	0	
An amount equal to the value of net deferred tax assets	R0160	0				
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180	0	0			
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						

F. QRT S.23.01.01
OWN FUNDS

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
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	0				
Deductions						
Deductions for participations in financial and credit institutions	R0230	0	0			
Total basic own funds after deductions	R0290	209,909,026	202,452,876.9	7,456,149.043	0	0
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300	0			0	
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310	0				
Unpaid and uncalled preference shares callable on demand	R0320	0				
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330	0				
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340	0				
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350	0				

F. QRT S.23.01.01
OWN FUNDS

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360	0				
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370	0				
Other ancillary own funds	R0390	0				
Total ancillary own funds	R0400	0			0	0
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	209,909,026	202,452,876.9	7,456,149.043	0	0
Total available own funds to meet the MCR	R0510	209,909,026	202,452,876.9	7,456,149.043	0	
Total eligible own funds to meet the SCR	R0540	209,909,026	202,452,876.9	7,456,149.043	0	0
Total eligible own funds to meet the MCR	R0550	209,909,026	202,452,876.9	7,456,149.043	0	
SCR	R0580	15,293,1910.2				
MCR	R0600	63,692,134.87				
Ratio of Eligible own funds to SCR	R0620	1.372565253				
Ratio of Eligible own funds to MCR	R0640	3.295682056				

G. QRT S.23.01.01.02
RÉCONCILIATION RESERVE

		C0060
Reconciliation reserve		
Excess of assets over liabilities	R0700	202,452,876.9
Own shares (held directly and indirectly)	R0710	0
Foreseeable dividends, distributions and charges	R0720	0
Other basic own fund items	R0730	69,025,757.64
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	0
Reconciliation reserve	**R0760**	**133,427,119.3**
Expected profits		
Expected profits included in future premiums (EPIFP) - Life business	R0770	0
Expected profits included in future premiums (EPIFP) - Non-life business	R0780	0
Total Expected profits included in future premiums (EPIFP)	**R0790**	**0**

H – QRT S.25.01.01(A,S) - SOLVENCY CAPITAL REQUIREMENT - FOR UNDERTAKINGS ON STANDARD FORMULA

Basic Solvency Capital Requirement

Article 112	Z0011	No

		Net solvency capital requirement	Gross solvency capital requirement	Allocation from adjustments due to RFF and Matching adjustments portfolios
		C0030	C0040	C0050
Market risk	R0010	94,433,172.23	104,746,740.6	
Counterparty default risk	R0020	8,296,513.179	8,296,513.179	
Life underwriting risk	R0030	94,616,106.96	96,030,436.53	
Health underwriting risk	R0040			
Non-life underwriting risk	R0050			
Diversification	R0060	-45062049.56	-47,441,795.57	
Intangible asset risk	R0070			
Basic Solvency Capital Requirement	R0100	152,283,742.8	161,631,894.7	

Calculation of Solvency Capital Requirement

Article 112	Z0012	No

		Value
		C0100
Adjustment due to RFF/MAP nSCR aggregation	R0120	
Operational risk	R0130	9,275,132.295
Loss-absorbing capacity of technical provisions	R0140	-9,348,151.943
Loss-absorbing capacity of deferred taxes	R0150	-8,626,964.937
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	

H – QRT S.25.01.01(A,S) - SOLVENCY CAPITAL REQUIREMENT - FOR UNDERTAKINGS ON STANDARD FORMULA

		Value
		C0100
Solvency Capital Requirement excluding capital add-on	R0200	152,931,910.2
Capital add-on already set	R0210	
Solvency capital requirement	R0220	152,931,910.2
Other information on SCR		
Capital requirement for duration-based equity risk sub-module	R0400	
Total amount of Notional Solvency Capital Requirements for remaining part	R0410	
Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420	
Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	R0430	
Diversification effects due to RFF nSCR aggregation for article 304	R0440	
Method used to calculate the adjustment due to RFF/MAP nSCR aggregation	R0450	No,adjustment
Net future discretionary benefits	R0460	45,368,151.35

Approach to tax rate

Article 112	Z0013	No

		Yes/No
		C0109
Approach based on average tax rate	R0590	Approach not based on average tax rate

Calculation of loss absorbing capacity of deferred taxes

Article 112	Z0014	No

		Before the shock	After the shock
		C0110	C0120
DTA	R0600		
DTA carry forward	R0610		
DTA due to deductible temporary differences	R0620		
DTL	R0630	8,626,964.91	0

Calculation of loss absorbing capacity of deferred taxes

Article 112	Z0015	No

		LAC DT
		C0130
LAC DT	R0640	-8,626,964.937
LAC DT justified by reversion of deferred tax liabilities	R0650	
LAC DT justified by reference to probable future taxable economic profit	R0660	-8,626,964.937
LAC DT justified by carry back, current year	R0670	
LAC DT justified by carry back, future years	R0680	
Maximum LAC DT	R0690	

I – QRT S.28.01.01(A,S) - MINIMUM CAPITAL REQUIREMENT - ONLY LIFE OR ONLY NON-LIFE INSURANCE OR REINSURANCE ACTIVITY

Linear formula component for life insurance and reinsurance obligations

		C0040
MCRL Result	R0200	63,692,134.87

Total capital at risk for all life (re)insurance obligations

		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	434,182,502.9	
Obligations with profit participation - future discretionary benefits	R0220	45,865,053.97	
Index-linked and unit-linked insurance obligations	R0230	71,310,03412	
Other life (re)insurance and health (re)insurance obligations	R0240		
Total capital at risk for all life (re)insurance obligations	R0250		136,201,692

Overall MCR calculation

		C0070
Linear MCR	R0300	63,692,134.87
SCR	R0310	152,931,910.2
MCR cap	R0320	68,819,359.57
MCR floor	R0330	38,232,977.54
Combined MCR	R0340	63,692,134.87
Absolute floor of the MCR	R0350	3,700,000
Minimum Capital Requirement	R0400	63,692,134.87

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