SOLVENCY AND FINANCIAL CONDITION REPORT 2023

GREENVAL INSURANCE
BNP PARIBAS GROUP

Contents

Summary

Business and Performance

Greenval Insurance Designated Activity Company ("Greenval" and "the Company") is a wholly owned subsidiary of Arval Service Lease SA. The ultimate parent of both entities is BNP Paribas SA.

Greenval is authorised by the Central Bank of Ireland ("CBI") to carry out the business of non-life insurance. The CBI has designated the Company as a low impact undertaking under its risk-based framework for the supervision of regulated firms, known as PRISM. The CBI has advised the company that its risk rating will be changed to Medium Low with effect from 1 January 2024. Greenval is reporting as an individual undertaking for Solvency II.

The principal activity of the Company is the provision of fleet motor insurance and associated products to the Arval Group and their clients in a number of primarily European Union territories, to complement Arval's mobility services.

The following table summarises the IFRS financial performance of the Company for the reporting period ended 31st December 2023 and 31st December 2022.

Financial Performance (EUR'000s)	31-Dec-2023	31-Dec-2022
Underwriting Performance	59,710	50,291
Investment Performance	8,995	(1,274)
Other Income and Expenses	(4,282)	(1,979)
Net Profit before Tax	**64,423**	**47,038**
Unrealised investment gains	6,334	(12,636)
Comprehensive Income	**70,757**	**34,445**
Corporation tax	(9,052)	(4,266)
Comprehensive Income after Tax	**61,705**	**30,136**

During 2023 the company:

a) Paid a dividend of €49m (2022: €29.5m) to its shareholder, Arval Service Lease SA,

b) Did not issue any ordinary shares (2022: €7.5m),

c) Maintained an A- credit rating from A.M. Best.

Refer to Section B.1.4. for further information on material transactions.

Refer to Section A for further details on the Company's Business and Performance.

System of Governance

Greenval has established and maintains an effective system of governance with clear delegated authorities, responsibilities and reporting lines as presented in the organisation chart which can be found at Appendix 1 of this report.

Greenval has assessed its system of governance and has concluded that it effectively provides for the sound and prudent management of the business, which is proportionate to the nature, scale and complexity of the operations of the Company.

The Central Bank (Individual Accountability Framework) Act 2023 (the IAF Act) was signed into law on 9 March 2023 and was partially commenced on 19 April 2023.

The Individual Accountability Framework (IAF) includes the following key elements:

• Senior Executive Accountability Regime (SEAR): This will require in-scope firms to set out clearly and fully where responsibility and decision-making lie within the firm's senior management.

•Conduct Standards: These include the Common Conduct Standards, which are a set of expected standards of conduct which apply to certain individuals in all regulated firms,, and the Additional Conduct Standards which apply to senior executives in all regulated firms, which apply from 29 December 2023 .

•Enhancements to the current Fitness & Probity (F&P) Regime: This will include clarifying firms' obligations to proactively certify that individuals carrying out certain specified functions are fit and proper. Enhancements to the Fitness & Probity (F&P) Regime went live from 29th December 2023.

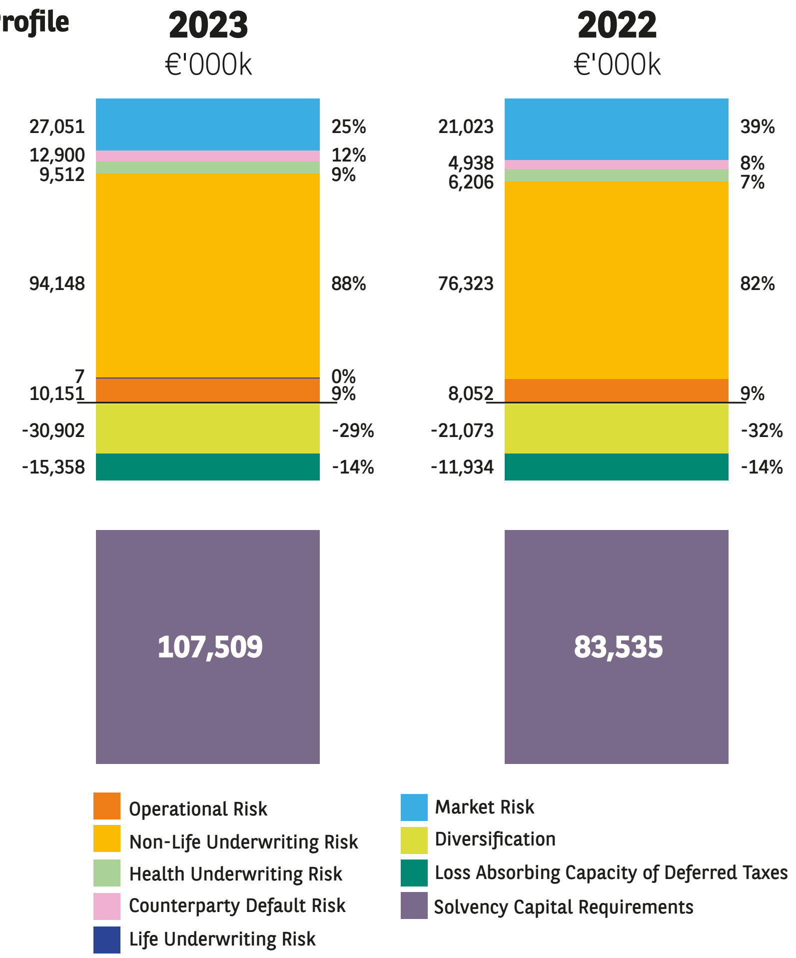
•Amendments to the Administrative Sanctions Procedure (ASP). A key change will be the Central Bank's ability to take enforcement action under the ASP directly against individuals for breaches of their obligations rather than only for their participation in breaches committed by a firm.

Refer to Section B for further details of the Company's System of Governance.

Risk Profile

Greenval has implemented effective processes for assessing and mitigating its material risk exposures. The Company's risk landscape comprises at a minimum, underwriting risk, market risk, credit risk, operational risk and liquidity risk that arise as a result of doing business. The Company's risk profile remains within the risk appetite.

SCR Risk Profile



Refer to Section C for further details of the Company's Risk Profile.

The majority of the insurance business underwritten by the Company is of a short tail nature, however, a proportion of bodily injury claims take relatively longer to settle completely. The Company's material underwriting risk exposures relate to pricing risk and reserving risk on the motor insurance products underwritten.

Valuation for Solvency Purposes

The Valuation for Solvency Purposes outlines the difference between the Solvency II valuation and the financial statements for the Company. Greenval's financial statements are prepared in accordance with International Financial Reporting Standards (IFRS).

Balance sheet	31-Dec-23			31-Dec-22		
	Solvency II Value	Statutory Accounts Value	Difference	Solvency II Value	Statutory Accounts Value	Difference
Total Assets	**320,709**	**335,759**	**(15,050)**	**291,213**	**303,090**	**(11,877)**
Liabilities	**Solvency II Value**	**Statutory Accounts Value**	**Difference**	**Solvency II Value**	**Statutory Accounts Value**	**Difference**
Technical Provisions	126,869	186,613	**(59,744)**	110,388	167,612	**(57,224)**
Other liabilities	14,865	10,258	**4,607**	16,576	9,296	**7,280**
Total Liabilities	**141,733**	**196,872**	**(55,138)**	**126,964**	**176,902**	**(49,938)**
Excess of Assets Over Liabilities	**178,976**	**138,889**	**40,087**	**164,249**	**126,182**	**38,067**

Refer to Section D for a further breakdown of the Valuation for Solvency Purposes.

The main differences between the valuation bases, methods and assumptions used by the Company in the two reporting bases are outlined in Section D.

Capital Management

The following table summarises the solvency position of the Company at 31st December 2023 and 31st December 2022 which is assessed using the Standard Formula.

Solvency Position (EUR'000s)	Dec-23	Dec-22
Total Tier 1 Unrestricted Own Funds	178,976	164,249
Solvency Capital Requirement ("SCR")	107,509	83,535
SCR Coverage	166%	197%
Minimum Capital Requirement ("MCR")	36,011	30,165
MCR Coverage	497%	544%

All the Company's own funds are classified as Tier 1 unrestricted and are available to cover the SCR and MCR.

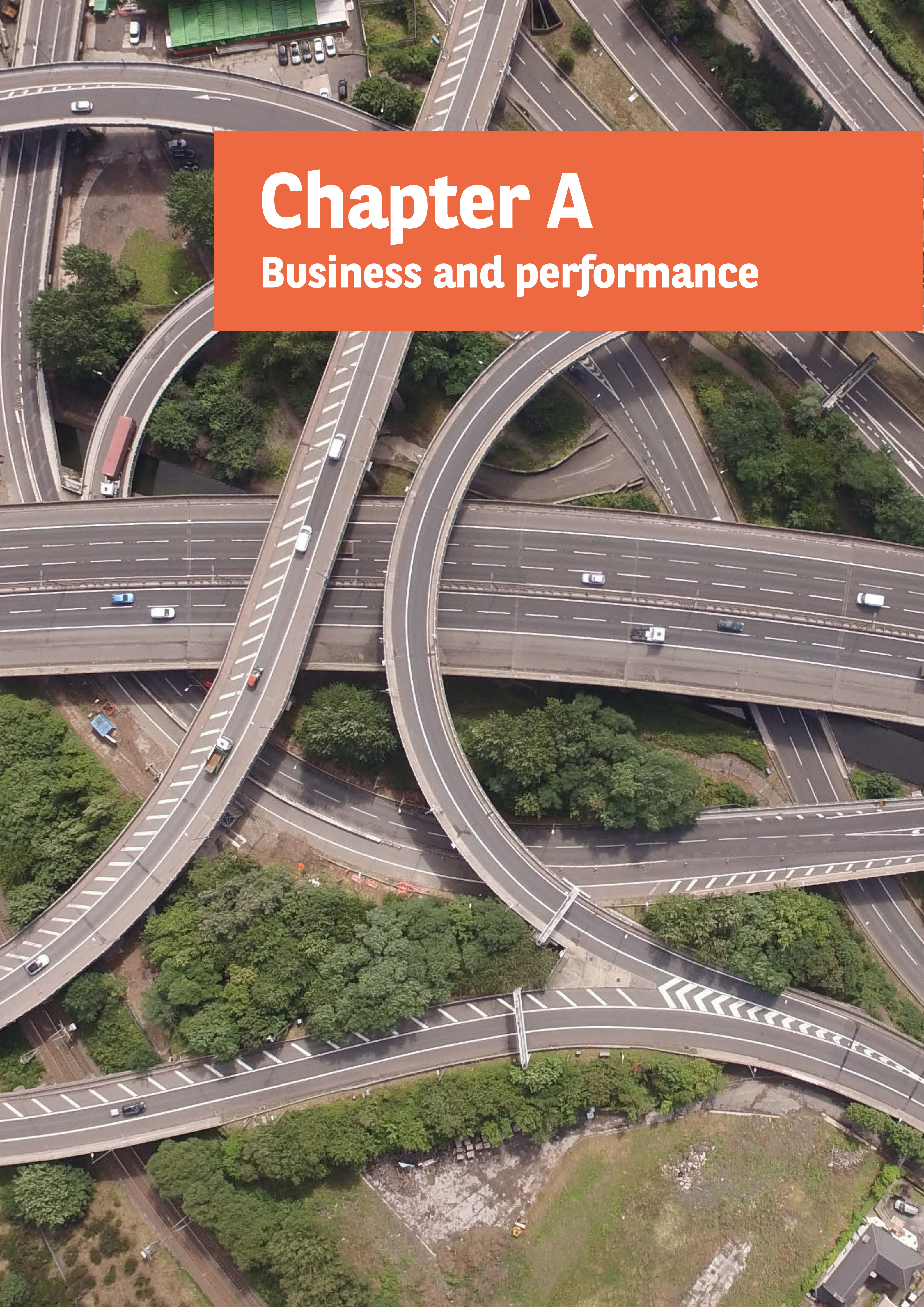
There were no instances of non-compliance with the MCR and the SCR during the reporting period ended 31st December 2023 and 31st December 2022.

The Company's Solvency Capital Requirement increased by €24m (c.29%) during the reporting period ended 31st December 2023 compared to 31st December 2022 with the largest variations deriving from:

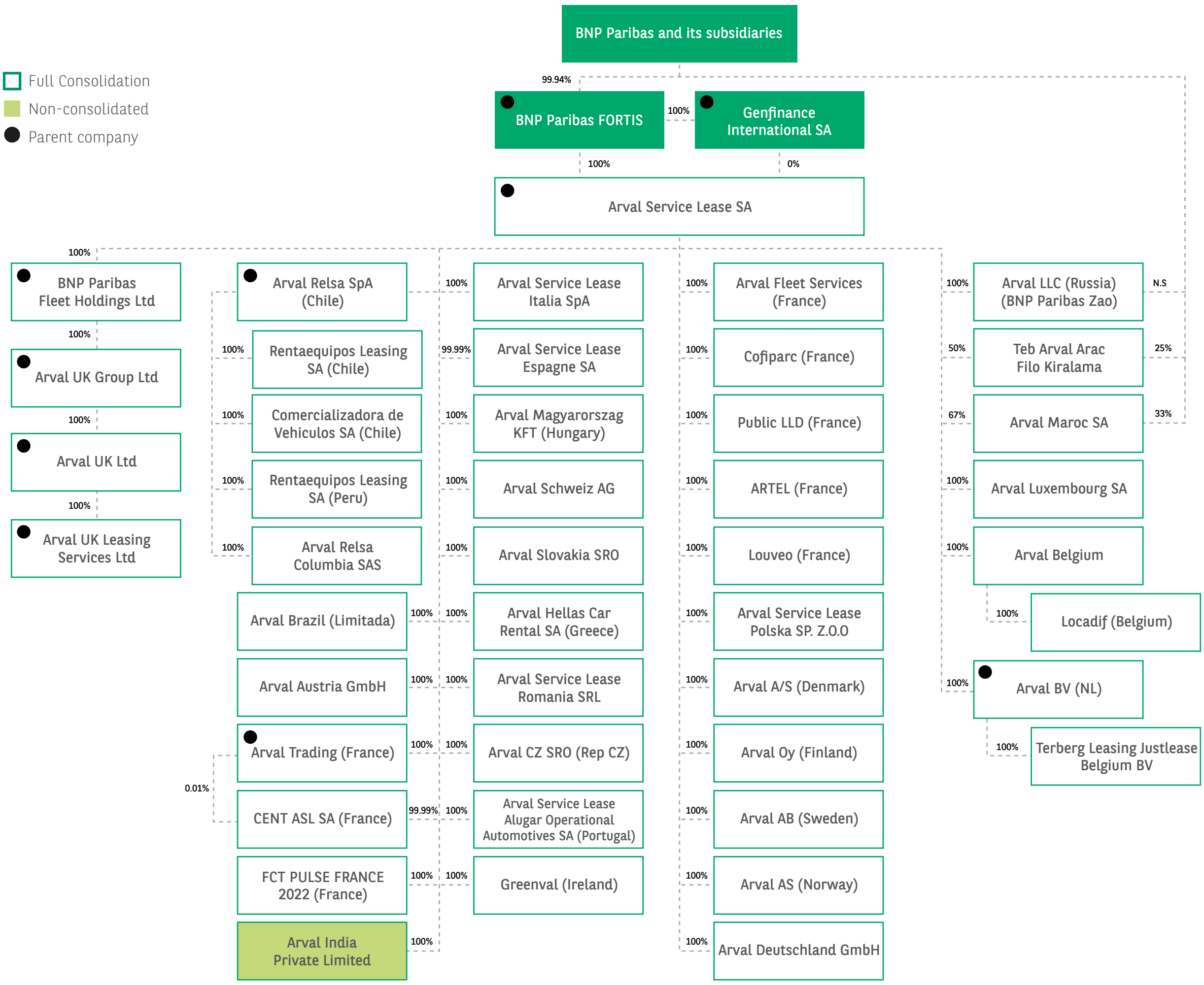
Non-life underwriting risk	+€18m	23%
Market risk	+€6m	29%
Diversification	-€10m	-47%

Report Approval

This report was reviewed by the Company's Audit Committee on 21st March 2024. It was subsequently reviewed and approved by the Board of Directors on 4th April 2024.



Chapter A
Business and performance



A1. Business

A1.1. Name and Legal Form of the Company

Greenval is a private company which is limited by shares.

A1.2. Supervisory Authority

Greenval is authorised by the Central Bank of Ireland ("CBI"), New Wapping Street, North Wall Quay, Dublin 1 D01 YW80, Ireland to carry out the business of non-life insurance in accordance with the provisions of the European Union (Insurance & Reinsurance) Regulations 2015.

The CBI has designated the Company as a low impact undertaking under its risk-based framework for the supervision of regulated firms, known as PRISM. The CBI has advised the company that its risk rating will be changed to Medium Low with effect from 1 January 2024.

A1.3. External Auditor

The Company's external auditors at 31st December 2023 are PricewaterhouseCoopers, Chartered Accountants & Statutory Audit Firm, One Spencer Dock, North Wall Quay, Dublin 1 D01 X9R7, Ireland.

PricewaterhouseCoopers will retire following completion of the 2023 audit and Deloitte Ireland LLP have been appointed as successors following a tender process.

A1.4. Qualifying Holdings

As at 31st December 2023 the Company is a wholly owned subsidiary of Arval Services Lease SA, 1 Boulevard Haussmann 75009, Paris, France.

The ultimate parent company is BNP Paribas SA, a company incorporated in France and listed on the Euronext Paris stock exchange. BNP Paribas SA's consolidated financial statements are available from the company at 16 Boulevard des Italiens, 75009 Paris, France.

A1.5. Group Structure

Greenval is reporting as an individual undertaking for Solvency II.

A1.6. Related Undertakings

The Company does not have any related undertakings that it has control of or an obligation to report results on.

The simplified organisation chart below explains the ownership and legal links between the Company, its immediate parent undertaking, Arval Service Lease SA and its ultimate parent, BNP Paribas SA.

- **BNP Paribas SA** is the ultimate parent of the group which is incorporated in France. It provides a range of banking and financial services in France and internationally.
- **BNP Paribas Fortis** is a banking subsidiary of the group which is based in Belgium and is the immediate parent undertaking to Arval
- **Arval Service Lease SA** is fully owned by BNP Paribas Fortis and is the group mobility company. Greenval is the preferred non-life insurance company chosen by the Arval Group. As at 31st December 2023 Arval Service Lease SA is the immediate parent undertaking to Greenval.

A1.7. Lines of Business and Geographical Areas

Greenval provides non-life motor insurance cover to Arval and Arval customers, in conjunction with Arval's mobility services. Greenval is the preferred non-life insurance company chosen by the Arval Group.

The following motor insurance products by lines of business are underwritten by the Company:

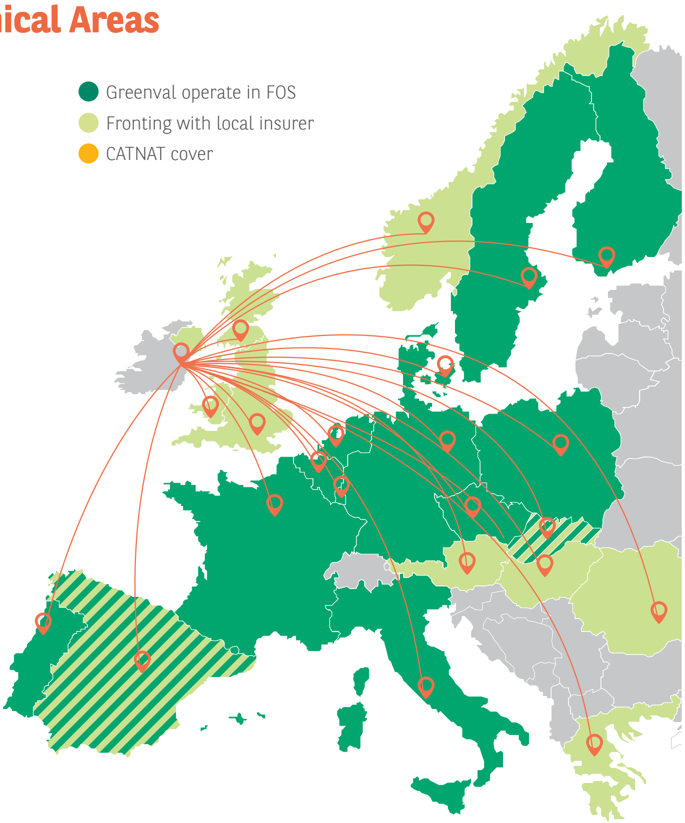
- **Third Party Liability ("TPL") which covers the insured in case of legal responsibility for damage caused to a Third Party by an automobile.**
- **Motor Own Damage ("MOD") which covers the damages incurred on the insured vehicle. This insurance can include a number of different perils: Fire, Natural Disaster, Theft of the vehicle, Personal Belongings, Professional Belongings and Hail etc.**
- **Driver & Passenger Cover ("DC") which covers the driver and passenger in case of an accident not involving a Third Party and/or an accident involving a Third Party where the driver is at fault (in the cases where TPL cover does not insure the driver).**
- **Guaranteed Auto Protection ("GAP") which in the case of a total loss covers the difference between the replacement value of the vehicle, as valued by an expert, and the contractual value of the insured vehicle.**
- **Legal expenses ("LP") covers financial assistance when the insured person commences legal action for damages against third parties.**
- **Natural Catastrophe ("CATNAT") covers risk retention programmes and used car stocks of Arval entities against natural catastrophe events such as wind storms, hail, flood, earthquake etc.**
- **Pecuniary losses ("PEC") covers driver onward journey in the event of a breakdown.**

As at 31st December 2022, Greenval operates in France, Belgium, Netherlands, Poland, Denmark, Finland, Spain, Portugal, Italy, Germany, Czech Republic, Sweden, Luxembourg and Slovakia on a direct business basis. Business is conducted by way of a reinsurance partnership through fronting in the UK, Norway, Hungary, Romania, Slovakia, Spain, Greece and Austria.

The Company's reinsurance policy in Russia, via a Fronting arrangement, expired on the 31st March 2022 and the Company did not renew this policy in light of the imposed sanctions and Russia's invasion of Ukraine.

The table below compares Greenval's lines of business to Solvency II lines of business and to the insurance authorisation the Company holds from the CBI.

Greenval	Solvency II Lines of Business	CBI Authorisation
Third Party Liability	4. Motor Vehicle Liability Insurance	10. Motor Vehicle Liability
Motor Own Damage	5.Other Motor Insurance	3. Land Vehicles 7. Goods in Transit (insured as an add on to MOD class 3)
Natural Catastrophe	5. Other Motor Insurance	3. Land Vehicles
Driver & Passenger Cover	1. Medical Expense Insurance	1. Accident
Legal Expenses	10. Legal Expenses Insurance	17. Legal Expenses
Guaranteed Auto Protection	12. Miscellaneous Financial Loss	16. Miscellaneous Financial Loss
Pecuniary Losses	12. Miscellaneous Financial Loss	16. Miscellaneous Financial Loss
Assistance	11. Assistance	18. Assistance



A1.8. Significant Business or Other Events

There are no significant business or other events that have occurred over the reporting period that have had a material impact on the Company. Please refer to section A.5 of this report for further information on other events during the year.

The Company has initially applied IFRS 17 "Insurance Contracts" and IFRS 9 "Financial Instruments", including any consequential amendments to other standards, from 1 January 2023. These standards have brought significant changes to the accounting for insurance and reinsurance contracts and financial instruments. Unless otherwise stated herein, the 2022 IFRS numbers are the originally reported numbers as reported last year under IFRS 4. Similarly, there has been no restatement of prior year balances for any potential impact of the application of the revised Solvency II 2.8 taxonomy.

As a consequence of the revised IFRS standards, the Company has amended certain of its Key Performance Indicators compared to the prior definitions.

Loss Ratio	Expense Ratio	Combined Ratio
Insurance service expenses ***less***	Other operating expenses ***plus***	Less ratio ***plus***
• attributable expenses • amortisation of insurance acquisition cashflows	• attributable expenses • amortisation of insurance acquisition cashflows	Expense Ratio
Plus		
Net income/expenses from reinsurance contracts		
Divided by	***Divided by***	
Insurance Revenue	Insurance Revenue	

A2. Underwriting Performance

The following table presents the underwriting performance by material lines of business for the year ended 31st December 2023 and 31st December 2022.

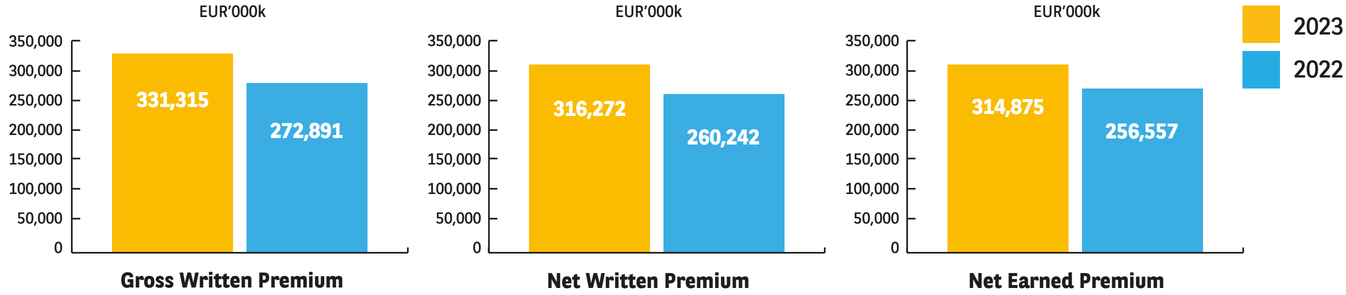
31-Dec-23	Driver Cover	Third Party Liability	Motor Own Damage & CATNAT	Other lines of business*	Total
	€'000	**€'000**	**€'000**	**€'000**	**€'000**
Gross Written Premium - Direct	17,740	124,647	110,676	13,024	266,087
Gross Written Premium - Reinsurance accepted	-	41,622	23,606	-	65,228
Reinsurers' share	-	(9,810)	(5,233)	-	(15,043)
Net Written Premium	**17,740**	**156,459**	**129,049**	**13,024**	**316,272**
Gross Earned Premium - Direct	18,098	131,513	112,510	13,022	275,141
Gross Earned Premium - Reinsurance accepted	-	33,300	21,986	-	55,287
Reinsurers' share	-	(10,304)	(5,249)	-	(15,553)
Net Earned Premium	**18,098**	**154,509**	**129,247**	**13,022**	**314,875**
Gross Claims Incurred - Direct	(7,229)	(73,773)	(102,681)	(1,693)	(185,376)
Gross Claims Incurred - Reinsurance accepted	-	(24,669)	(18,560)	6	(43,223)
Reinsurers' share	-	1,782	12,667	2	14,451
Net Claims Incurred	**(7,229)**	**(96,659)**	**(108,574)**	**(1,685)**	**(214,148)**
Expenses incurred	(855)	(27,532)	(16,073)	(1,986)	(46,449)
Underwriting Result	**10,011**	**30,318**	**4,600**	**9,351**	**54,278**

*Other lines of business consist of LP, GAP, PEC and annuities.

31-Dec-22	Driver Cover	Third Party Liability	Motor Own Damage & CATNAT	Other lines of business*	Total
	€'000	**€'000**	**€'000**	**€'000**	**€'000**
Gross Written Premium - Direct	11,634	111,335	92,466	10,958	226,393
Gross Written Premium - Reinsurance accepted	-	30,463	16,035	-	46,498
Reinsurers' share	-	(9,750)	(2,899)	-	(12,649)
Net Written Premium	**11,634**	**132,048**	**105,602**	**10,958**	**260,242**
Gross Earned Premium - Direct	11,580	107,969	91,950	10,948	222,447
Gross Earned Premium - Reinsurance accepted	-	30,433	15,970	-	46,403
Reinsurers' share	-	(9,418)	(2,875)	-	(12,293)
Net Earned Premium	**11,580**	**128,984**	**105,045**	**10,948**	**256,557**
Gross Claims Incurred - Direct	(1,822)	(69,444)	(71,589)	(1,247)	(144,102)
Gross Claims Incurred - Reinsurance accepted	-	(26,831)	(9,274)	30	(36,075)
Reinsurers' share	(295)	13,810	2,351	-	15,866
Net Claims Incurred	**(2,117)**	**(82,465)**	**(78,512)**	**(1,217)**	**(164,311)**
Expenses incurred	(1,149)	(21,852)	(13,436)	(1,744)	(38,181)
Underwriting Result	**8,314**	**24,667**	**13,097**	**7,987**	**54,065**

*Other lines of business consist of Legal Cover, GAP and PEC.

The primary measures of underwriting performance used by the Company are displayed below and these are monitored on a country and line of business basis:



1) Gross written premium, Net written premium & Net earned premium

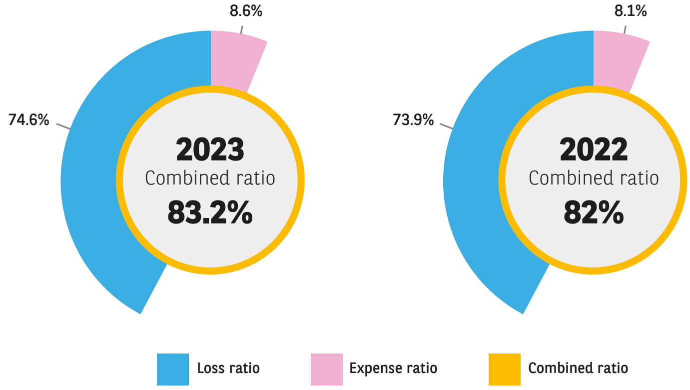
- Gross written premiums have increased in the year by 21% from €273m in 2022 to €331m in 2023.
- Net written premiums have increased in the year by 22% from €260m in 2022 to €316m in 2023.
- Net earned premiums have increased in the year by 23% from €257m in 2022 to €315m in 2023.
- These increases are primarily due to increased fleet numbers in existing countries plus the impact of an acquisition by Arval in the Netherlands.

2) Combined operating ratio

- Combined ratio comprising claims, acquisition and expense ratios for 2023 & 2022 are as follows:

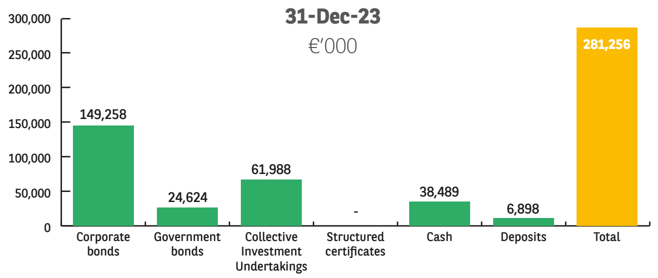
The Combined ratio has increased compared to the prior year as a result of an increase in both loss and expense ratios. Claims ratio has increased by 0.7% on the preceding year. In 2023, frequency began to return to pre-Covid levels; however, there is evidence of a continuing lower level of frequency in some territories reflecting the post-Covid lower mileage. The expense ratio (which under IFRS 17 includes the amortisation of acquisition costs) has increased from prior year by 0.5%.

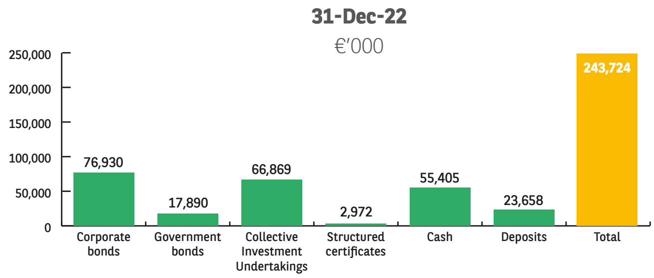
The material geographical areas which Greenval operates in in terms of liabilities are France, Netherlands, Italy, Poland and Spain.



A3. Investment Performance

At 31st December 2023 and 31st December 2022 the Company's investment portfolio comprised of the following. There were no investments in securitisations. 2022 have been restated for application of IFRS 9 and IFRS 17.



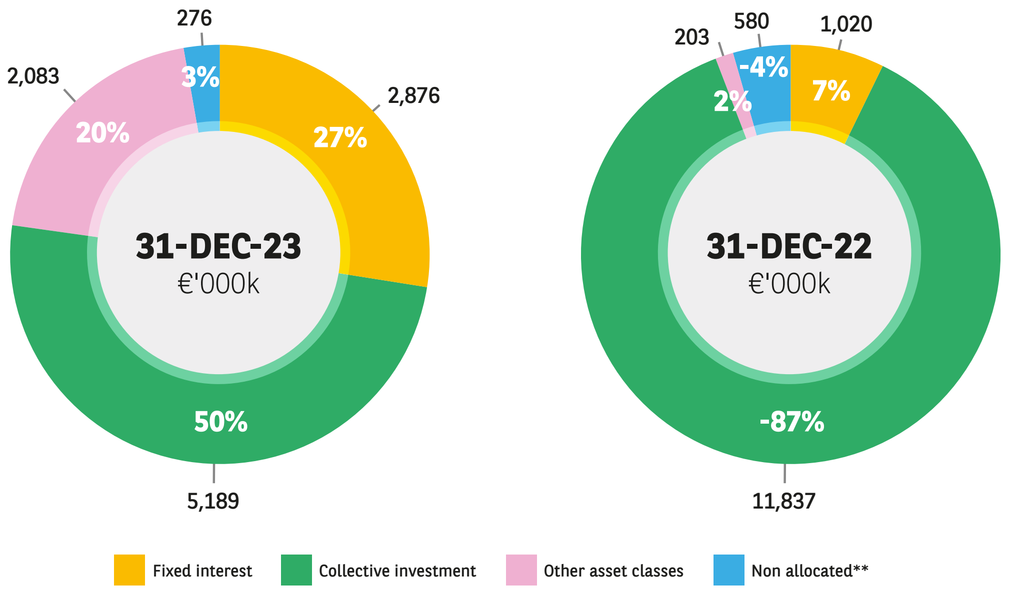


The table below summarises the investment performance for the reporting period.

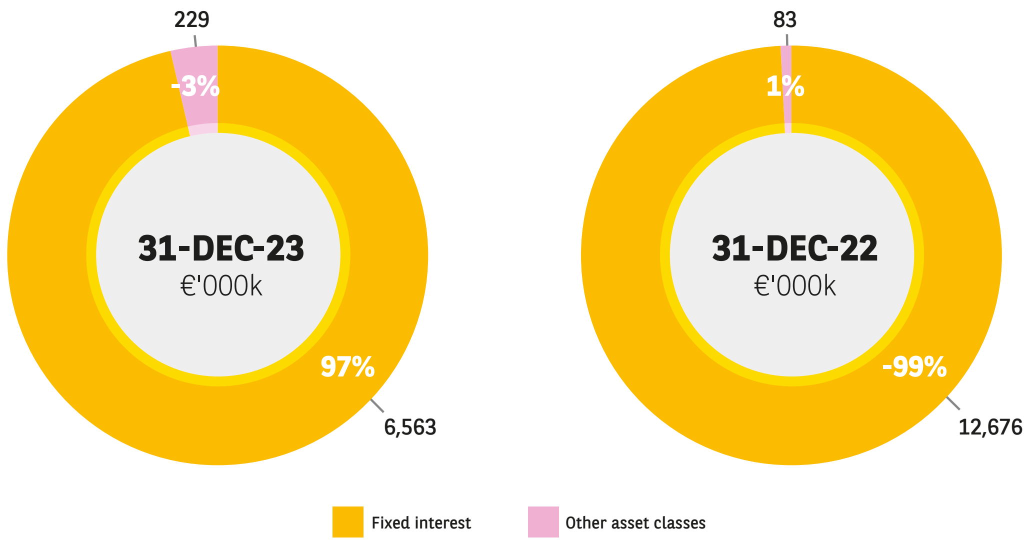
	31-Dec-23					31-Dec-22 (Restated)				
Asset Category	Income & Expenses	Realised Gains & Losses	Total through Profit & Loss	Unrealised Gains & Losses (P&L)	Unrealised Gains & Losses (OCI)	Income & Expenses	Realised Gains & Losses	Total through Profit & Loss	Unrealised Gains & Losses (P&L)	Unrealised Gains & Losses (OCI)
	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000
Fixed Interest	3,161	(285)	-	2,876	6,563	1,021	(2)	-	1,019	(12,676)
Collective Investment Funds	1,542	251	3,396	5,189	-	1,749	(5,892)	(7,694)	(11,837)	-
Other asset classes	1,999	83	-	2,082	(229)	203	-	-	203	83
Non allocated*	276	-	-	276	-	(580)	-	-	(580)	-
Total	**6,978**	**49**	**3,396**	**10,423**	**6,334**	**2,393**	**(5,894)**	**(7,694)**	**(11,195)**	**(12,593)**

*Comprise foreign exchange and other Investment Management expenses

Profit & Loss



OCI



Investment performance for the year, recognised in the P&L under IFRS 9, has increased by 193% (2023 +€10.4m vs Restated 2022 -€11.2m). Mark-to-market returns on equity funds contributed €4.6m to the turnaround with a gain of €2.3m in 2023 versus a loss of €2.3m in 2022. Other collective funds, comprising primarily mortgages and loans, also contributed with gains of €1.1m versus €6.4m of losses in the prior year. Income from fixed interest exposures and short term deposits increased significantly to €5.2m compared to €1.2m in 2022 as yields increased. This was also aided by greater deposits being placed on non-Euro denominated business. The mark-to-market adjustment included in other comprehensive income, which now under IFRS 9 only relates to instruments which pass the SPPI (Solely Payments of Principal and Interest) test, remains significantly negative on a cumulative basis in the Statement of Financial Position, but contributes a gain of €6.3m in the Statement of Other Comprehensive Income compared to a loss of €12.6m recognised in 2022.

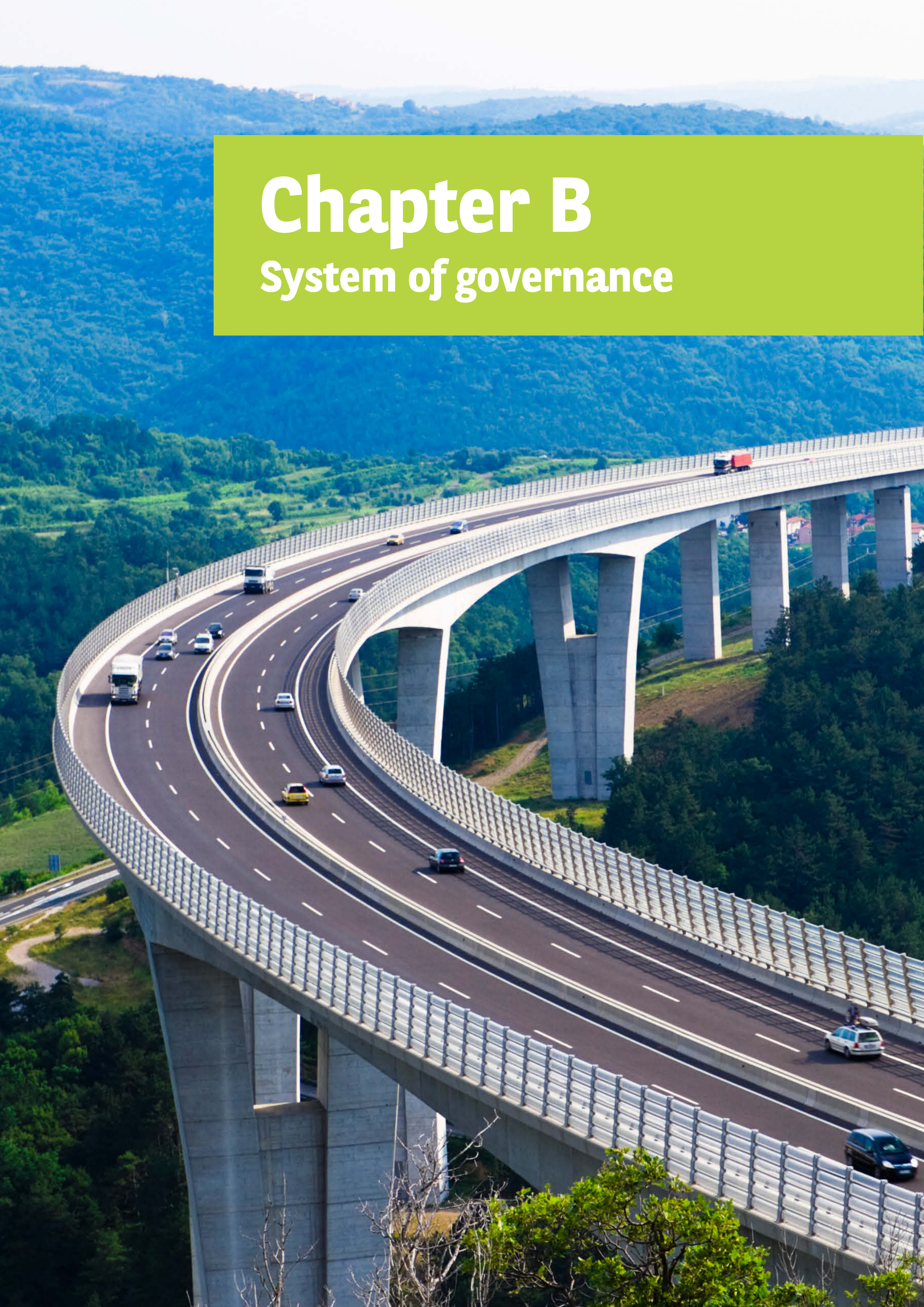
A4. Performance of other activities

The Other Income category has declined by 41% on the prior year and largely reflects income from services provided to group companies.

A5. Any other information

Refer to Section B.1.4. Material Transactions for further information on dividend distributions for 2022 and 2023.

Chapter B
System of governance



B1. General Information on the System of Governance

B1.1. Overview of the System of Governance

Greenval has established and maintains an effective system of governance with clear delegated authorities, responsibilities and reporting lines as presented in the organisation chart at appendix 1 of this report.

The system of governance is regularly reviewed to ensure its continued appropriateness reflecting changing commercial and regulatory requirements and organisational developments.

B1.1.1. Board of Directors

The table below presents the composition of the current Board of Directors ("the Board") of Greenval along with each Directors designation and a summary of the segregation of responsibilities within Board Committees.

Directors name	Directors designation	Board committee membership & responsibilities	Length & Tenure on Board & Sub-Committees
Derek Kehoe	Non-Executive Director & Chair	Investment Committee Member	Board: 8 years and 5 months Investment Committee: 7 years and 9 months
Paul Duffy	Independent Non-Executive Director	Audit Committee Member & Chairperson, Risk Committee Member, Investment Committee Member	Board: 7 years and 11 months Risk Committee: 6 years and 1 month Audit Committee: 6 years and 3 months Investment Committee: 7 years and 1 month
Olivier Mantoulan	Executive Director & Managing Director	N/A	Board: 7 years and 2 months
Remi Esclattier	Non-Executive Director	Risk Committee Member Investment Committee Member & Chairperson	Board: 6 years Risk Committee: 5 years and 10 months Investment Committee: 3 years and 3 months
John Sheridan	Executive Director & Chief Financial & Operating Officer	Investment Committee Member	Board: 3 years and 6 months Investment Committee: 3 years and 3 months
Bart Beckers	Non-Executive Director	Risk Committee Member	Board: 2 years and 3 months Risk Committee: 2 years and 3 months
Stephane De Marnhac	Non-Executive Director	Audit Committee Member	Board: 2 years and 3 months Audit Committee: 2 years and 3 months
Joan Collins	Independent Non-Executive Director	Audit Committee Member Risk Committee Member & Chairperson	Board: 1 year and 3 months Risk Committee: 1 year and 1 month Audit Committee: 9 months

The Board is responsible for the effective, prudent and ethical oversight of the Company and meets on a quarterly basis or more frequently as required.

The Board is responsible for setting and overseeing:

- the business strategy for the Company
- a robust and transparent organisational structure with effective communication and reporting channels
- the amounts, types and distribution of capital adequate to cover the risks of the Company
- the strategy for the on-going management of material risks
- an adequate and effective internal control framework, that includes well-functioning actuarial, risk management, compliance and internal audit functions as well as an appropriate financial reporting and accounting framework

The role and responsibilities of the Board are clearly documented in its Terms of Reference and Schedule of Reserved Matters which are reviewed on an annual basis by the Board of Directors.

B1.1.2. Board Committees

Greenval's Board has established three Board Committees that meet on a quarterly basis, or more frequently as required, and report to the Board, namely the Audit Committee, Risk Committee and Investment Committee.

The authority, functions, membership and reporting lines of the committees established by the Board as well as meeting frequency, voting rights and quorums are clearly outlined in the written Terms of Reference established by the Board for each committee.

The Terms of Reference are reviewed at least annually by the committees to ensure continuing appropriateness. Recommendations on revisions are provided to the Board for review and approval where necessary.

Audit Committee

The main roles and responsibilities of the Audit Committee are:

- Review financial statements and other published documents and make recommendations to the Board
- Monitor the effectiveness, independence and objectivity of the external auditors
- Monitor the effectiveness of the Company's Internal Audit Function in the context of the Company's overall risk management system
- Review any significant matters raised by the internal and external auditors
- Review the effectiveness and appropriateness of the Company's internal controls
- Review the Company's arrangements for its employees to raise concerns, in confidence, about possible wrong-doing in financial reporting or other matters

Risk Committee

The main roles and responsibilities of the Risk Committee are:

- Monitor the effectiveness of the Company's risk management system and Risk Management Function
- Monitor the implementation of the Company's risk strategy and maintenance thereof
- Review and make recommendation to the Board on risk appetite and risk management policies across the Company
- Review capital and solvency position of the Company
- Oversee the own risk and solvency assessment process

Investment Committee

The main roles and responsibilities of the Investment Committee are:

- Ensure compliance with the Board approved investment policy for the Company
- Review the performance of the investment advisor to the Company
- Monitor external developments in relation to investments
- Ensure that the Company is in compliance with the prudent person principle
- Maximise the investment return while ensuring that the liability profile of the Company is hedged with suitable investments and minimising the risk of loss due to counterparty default

B1.1.3. Management Committees

Management Committee & Executive Committee

The Management Committee ("MT") and Executive Committee ("ComEx") are mandated and responsible for implementing the strategies approved by the Board and managing the affairs of the Company. Both committees are chaired by the Managing Director ("MD"). The MD is a member of the Board and reports to each Board meeting on business performance and operations.

The main responsibilities of these committees are to:

- Review, implement and monitor the business plans and recommend changes for approval by the Board
- Structure the operations to maximise efficiency
- Ensure that effective systems of controls are established and maintained which facilitate identification and effective management of all significant risks facing the business
- Decide upon priorities for allocating operating resources within the current business plan
- Ensure the functional areas provide accurate and timely management information to enable the business to be effectively managed
- Review financial and operational performance of the business and authorise appropriate actions
- Review compliance, risk and internal audit reports to ensure that ownership is allocated and appropriate corrective action is taken
- Pass relevant and specific information to the Board Committees and the Board, including any recommendations that require approval by the Board

Reserving Committee

The Reserving Committee ("ROC") is mandated to support the Greenval Board, Audit Committee and any additional Committees in monitoring elements of reserving within Greenval. It will ensure adequate and reasonable reserves are in place and that reserving activities are consistent with applicable insurance accounting policies, actuarial standards of practice, regulatory requirements and other related policies. The ROC is chaired by the MD and meets quarterly.

The main responsibilities of ROC are:

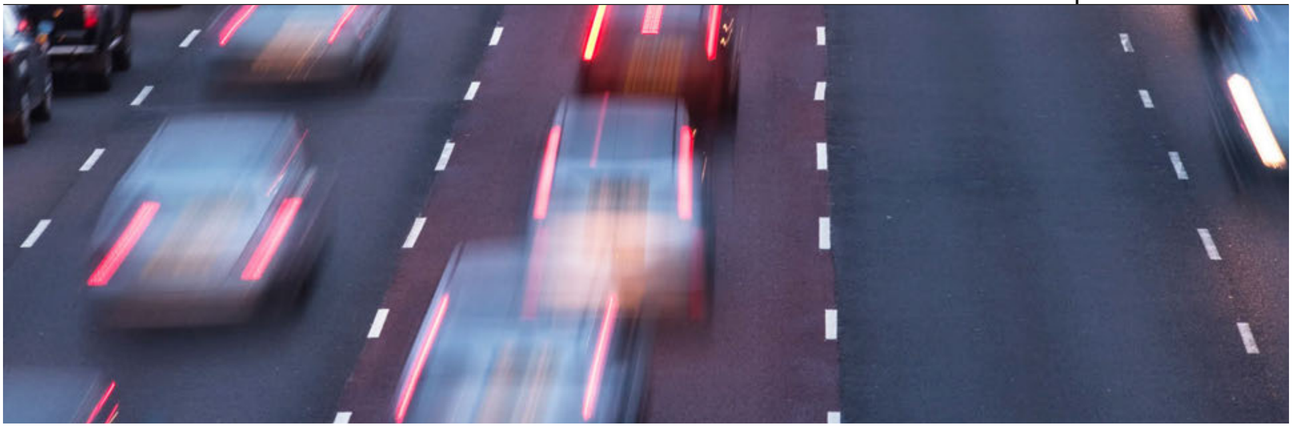
- Review insurance reserves for adequacy and reasonableness
- Review and discuss results from actuarial reserve reviews along with key assumptions and material issues underlying current reserve valuations
- Review changes in reserve amounts and measures of reserve adequacy over time
- Review and approve parameters for determining when reserves should be modified
- Review and discuss the basis for determining incurred loss estimates for current period exposures
- Understand changes in assumptions and methodologies used to estimate, evaluate, determine, and record reserves
- Review results of internal and external audits on reserving as well as results from external consulting engagements
- Review the HoAF Actuarial Report and Opinion on Technical Provisions
- Review and approve that reserving activities are consistent with applicable insurance accounting policies, procedures, and roles as they are developed and updated while noting that certain actuarial standards of practice, regulatory requirements and other related policies may also need review and approval by Greenval's Audit Committee and Board.

Pricing Committee

The Pricing Committee ("POC") is mandated to support the Greenval Board, Risk Committee and any additional Committees in monitoring elements of pricing within Greenval. It will ensure adequate and reasonable underwriting practices are in place and that pricing activities are consistent with applicable insurance accounting policies, actuarial standards of practice, regulatory requirements and other related policies. The POC is chaired by the MD and meets quarterly.

The main responsibilities of POC are:

- Report on Projected Combined Operating ratio, with focus on expected premium rate and claims experience over the projection period.
- Monitor trends, and make recommendations, as required, on the risk profiles of classes of risks in general, and of individual risks in particular, that should either be included or excluded from acceptance and validate any corresponding changes to Risk Acceptance Guidelines.
- Review pricing projects and business plans and validate pricing proposals.
- Review and approve acceptance of non-standard risks and risks exceeding underwriting authority of the Head of Underwriting in accordance with the decision process under the Company's New Business ("TAC/NAC") policy.
- Review and validate underwriting strategy per insurance programme, discuss corresponding underwriting activities.
- Monitor performance of reinsurance programme, reinsurers and reinsurer broker, review and approve reinsurance renewal strategy, and an annual review of the Reinsurance Policy.
- Monitor product review (and remediation) as well as distribution (Product Oversight and Governance), reviewing results of internal and external audits as well as results from external consulting engagements; annual review of the Product Oversight and Governance Policy.
- Review and approve the Pricing & Underwriting Policy, procedures, and roles as they are developed and updated.



Compliance Committee

The Compliance Committee ("CC") is mandated to ensure Senior Management ownership and monitoring of compliance risk management within Greenval. The CC is chaired by the MD and meets quarterly.

The scope of the CC encompasses those compliance risks arising from activities within Greenval's insurance authorisation from the Central Bank of Ireland and within the following BNP Paribas Group compliance domains:

- **Know Your Customer (KYC). The scope of this domain also includes Know Your Intermediary (KYI) and Know Your Supplier (KYS).**
- **Financial Security (FS). The observance of Sanctions and AML (Anti-Money Laundering) legislation, regulation and BNPP Financial Security policies.**
- **Protection of Interests of Customers (PIC). Observance of the BNPP policies and guidelines relating to customer protection.**
- **Professional Ethics (PE). Observance of the BNPP Code of Conduct and compliance with bribery and conflict of interests' policies.**

Outsourcing Oversight Committee

Greenval has established an Outsourcing Oversight Committee ("OOC") whose purpose is to support the Greenval Board, Risk Committee and any additional Board Committees and Management Committees in the effective discharge of their responsibilities for managing the risks and exposure in relation to functions and activities outsourced by Greenval. The OOC is chaired by the MD and meets quarterly.

The main responsibilities of OOC are:

- **Ensuring the implementation of, and ongoing compliance with, the requirements of the following:**
  - Greenval's Board approved Outsourcing Policy
  - BNP Paribas Group policies in relation to outsourcing
  - Regulatory requirements in relation to outsourcing
- **Review the Company's Outsourcing Policy annually and make recommendations for policy updates to the Risk Committee and the Board for approval.**
- **Monitoring of the outsourcing of all functions and activities in line with the Board approved Outsourcing Policy.**
- **Validation of the 'Outsourcing Manager' for each outsourced function or activity. The 'Outsourcing Manager' must be a PCF of the Company who will be responsible for the outsourced relationship on an ongoing basis.**
- **Review and approve the arrangements' criticality assessment, as required by Greenval's Outsourcing Policy.**
- **Review and approve the providers' classification as outsourcing or purchasing, resulting from Outsourcing Manager's evaluation.**
- **Review all existing outsourcing arrangements determine if the SLA/contract is properly defined for the service outsourced**
- **Review the performance of all outsourced functions and activities**
- **Monitoring of actions taken to close recommendations and findings from any internal audit reviews on outsourcing**
- **Report to the Risk Committee and/or Board on outsourcing activities with such recommendations as the Committee may deem appropriate.**

Purchasing Providers Committee

Greenval has established a Purchasing Providers Committee ("PPC") whose purpose is to support the Greenval Board, Risk Committee and any additional Board Committees and Management Committees in the effective discharge of their responsibilities for managing the risks and exposure in relation to functions and activities purchased by Greenval. The PPC will focus on all Greenval providers other than those which are outsourced. The PPC is chaired by the CFO and meets quarterly.

The main responsibilities of the PPC are:

- **Ensuring the implementation of, and ongoing compliance with, the requirements of the following:**
  - Greenval's approved Procurement Policy
  - BNP Paribas Group and Arval policies in relation to Procurement and supplier risk management
  - Regulatory requirements in relation to Procurement activities
- **Review the Company's Procurement Policy annually and make recommendations for policy updates.**
- **Monitoring of the critical purchasing activities of all functions (other than those related to Outsourcing, already monitored by the OOC), in line with the Company's approved Procurement Policy.**
- **Review all existing critical purchasing relationships to ensure the contract is properly defined.**
- **Review the performance of all critical purchasing providers.**
- **Report to the OOC on Procurement activities/issues, as the Committee may deem appropriate.**

Data, I.T. Oversight & Business Resilience Committee

Greenval has established a Data, I.T. Oversight & Business Resilience Committee ("DIOBRC") to support the Greenval Board, Risk Committee and management in the effective discharge of their responsibilities for managing the risks and exposure in relation to relevant functions and activities. The DIOBRC is chaired by the MD and meets quarterly.

The main responsibilities of the DIOBRC are:

- **Monitoring of data quality.**
- **General data protection regulation including reviews of any data breaches, GDPR policy adoption overviews and control updates, maintenance and update of Register of Processing Activities ("ROPA"), data retention and deletion, and training.**
- **Monitor Insurance Bureau reporting, including confirmation of satisfactory discharge of reporting obligations and to follow up on issue resolution.**
- **Ensuring the regular review, implementation of, and ongoing compliance with, the requirements of the following:**
  - Greenval's Board approved Business Continuity Plan Policy ("BCP").
  - BNP Paribas Group and Arval policies in relation to BCP.
  - Regulatory guidance from the CBI and others in relation to BCP
- **Ensure a culture of security and resilience is prevalent throughout the Company.**
- **Ensure that I.T. security (including cyber security) reviews are conducted and documented at regular intervals.**
- **Approval of changes to standard hardware and patching application.**
- **Review the Company I.T. strategy annually.**
- **Provide authorisation to any changes to the Company website including any social media sites.**

New Activity Committee

Greenval have established a New Activity Committee, which is chaired by the MD, whose purpose is to validate any new activity or altered activity related to products, services and service components. New activity is one that cannot be instigated, monitored or administered within the existing written guidelines, policies, procedures or systems and, hence, does not fit in the approval framework. Existing activities are considered as altered when their conduct has been deeply affected by new conditions.

Conduct Committee

Greenval have established a Conduct Committee, which is chaired by the MD, whose purpose is to support the Greenval Board and any additional Board Committees and Management Committees in monitoring the implementation of the BNP Paribas Group Code of Conduct.

The Conduct Committee meets annually, with the main responsibility being the monitoring of the implementation of the BNP Paribas Group Code of Conduct on:

- **Customer interest.**
- **Professional ethics.**
- **Respect for colleagues.**
- **Mandatory training for staff.**

Financial and Operational Risk Control Committee (FORCC)

Greenval have established a FORCC, which is chaired by the CFO, whose purpose is to provide the attendees with the necessary key indicators and the related analysis and attention points in order to take the adequate decisions as required on accounting and financial information and the associated financial and other risks. The main duties of the Committee are to:

- **Provide a global vision of the current situation of Finance regarding the internal control framework and related operational risks**
- **Discuss, analyse and decide over Finance permanent control topics**
- **Raise alerts on recurrent weaknesses**
- **Formalize the action plans to solve issues and their regular follow up**

Finance Internal Control Committee (FICC)

Greenval have established a FICC, which is chaired by the CFO, whose purpose is to provide the attendees with the most current view of the internal control framework and operational risks pertaining to finance in order to take the adequate decisions as required on accounting and financial information and the associated financial and other risks. The main duties of the Committee are to:

- **Provide a global vision of the current situation of Finance regarding the internal control framework and related operational risks**
- **Discuss, analyse and decide over Finance permanent control topics**
- **Raise alerts on recurrent weaknesses**
- **Formalize the action plans to solve issues and their regular follow up**

B1.1.4. Key Functions

Risk Management Function

Greenval has appointed a Chief Risk Officer (CRO) who is responsible for the Risk Management Function. Note that the Company's CRO resigned during 2023 and was filled on a temporary basis by an external consultant. The CBI notified approval of a proposed permanent appointment on 8 March 2024.

Refer to section B.3.2 of this report for further information on the implementation of the Risk Management Function.

Compliance Function

Greenval has appointed a Head of Compliance who is responsible for the implementation of Compliance Function.

Refer to section B.4.2 of this report for further information on the Compliance Function.

Actuarial Function

In line with the requirements of Solvency II, and the CBI's 'Domestic Actuarial Regime and Related Governance Requirements under Solvency II', Greenval has appointed a Head of the Actuarial Function. Jean Rea of KPMG has been engaged on an outsourced basis to provide the Head of the Actuarial Function.

Refer to section B.6 of this report for further information on the Actuarial Function.

Internal Audit Function

Greenval has outsourced its Internal Audit Function to an independent BNP Paribas Group Function, Inspection Generale. Greenval has appointed the Head of Inspection Generale for the BNP Paribas Group in Ireland as the Company's Head of Internal Audit Function and the appointment has received PCF approval from the CBI.

Refer to section B.5 of this report for further information on the implementation and independence of the Internal Audit Function.

B1.2. Material Changes to the System of Governance

Greenval has established and maintains an effective system of governance with clear delegated authorities, responsibilities and reporting lines.

There were no changes to membership of the Board during the reporting period. The following key function appointments took place subsequent to the reporting period:

- **David Devereux as PCF 14 - Chief Risk Officer**

Apart from the above there were no other material changes to the system of governance during the reporting period.

B1.3. Remuneration Practices

Principles of remuneration practices

Greenval recognises that the existence of appropriate compensation to attract and retain competent, experienced and skilled employees is an essential part of the Company's business strategy but that any compensation provided should align employees' decision-making and risk-taking behaviour with the Company's business objectives and risk management strategy.

The Company provides a range of benefits to employees, including contractual salary, life cover, permanent health insurance, paid holiday arrangements, pension contributions, car allowances and mortgage subsidies.

The Company offers all employees the choice of making contributions into a defined contribution pension scheme, which the Company will match up to a limit. Once the contributions have been paid the Company has no further payment obligations. The assets of the plan are held separately from the Company in independently administered funds. Employees can contribute additional voluntary contributions to suit their circumstances.

The variable remuneration potential for Company employees, which is paid in cash or as an option to participate in a profit sharing scheme of the BNP Paribas Group, is limited within the range 0% to 35% of basic salary. Remuneration plans offer rewards according to performance at group, company and individual level as appropriate. Individual objectives include a combination of financial and non-financial targets, taking into account ethical behaviour and corporate responsibility. Variable remuneration plans are underpinned by performance management systems in order to reinforce a performance culture. The Company's Remuneration Policy seeks to prevent the taking of more risk than is acceptable under the Company's risk appetite framework.

Members of the Board, who are not employees of the Company or employees of the BNP Paribas Group, receive compensation in the form of a fixed Director's fee with no variable component.

Share options, shares or variable components of remuneration

The Company's remuneration practices do not include the offer of share options or shares of Greenval to members of the Board, key function holders or other Company employees.

Remuneration practices do allow for a variable component of compensation for Greenval employees, as stated above, which remunerates quantitative and qualitative achievements that are measured on the basis of observed performance and individual assessments relative to fixed objectives.

Variable compensation does not constitute a right and is set in a discretionary manner each year in accordance with the compensation policy for the relevant year and corporate governance guidelines. The variable component of compensation takes the form of a bonus for employees, paid in cash or as an option to participate in a profit sharing scheme of the BNP Paribas Group, and is determined so as to avoid incentives that could lead to conflicts of interest or non-compliance with conduct of business rules.

Members of the Board, who are not employees of the Company, do not receive variable compensation from Greenval.

Supplementary pension or early retirement schemes for the members of the Board of Directors and other key function holders

The Company's remuneration practices do not include any supplementary pension or early retirement schemes for members of the Board of Directors, key function holders or other Company employees.

B1.4. Material Transactions

During the reporting period the following material transaction took place with the Company's shareholder, with persons who exercise a significant influence on the Company, and with members of the Board:

a) A dividend of €49m (2022: €29.5m) was paid to its shareholder, Arval Service Lease SA.

b) No ordinary shares were issued during 2023 (2022: €7.5m)

Other than the above and contracted employee salaries and benefits, there were no material transactions with the Shareholder (other than those of a standard insurance nature negotiated on an arm's length basis), with persons who exercise a significant influence on the Company and with members of the Board.

B2. Fit and Proper Requirements

B2.1. Requirements for Skills, Knowledge and Expertise

Greenval ensures that the persons who effectively run the Company or have other key functions, including members of the Board, are 'fit' and take account of the respective duties allocated to them to ensure the provision of sound and prudent management through their professional qualifications, knowledge and experience and are proper by being of good repute and integrity.

Greenval ensures that the persons, who effectively run the Company or have other key functions, including members of the Board, collectively possess at least qualifications, experience and knowledge about:

a) insurance and financial markets

b) business strategy and business model

c) system of governance

d) financial and actuarial analysis

e) regulatory framework and requirements

B2.2. Process for Assessing the Fitness and Probity of Persons

Greenval has established and implemented a Fitness and Probity Policy, which sets out the process for assessing the fitness & propriety of persons, and aligns with the CBI's Fitness and Probity Standards.

Greenval's assessment of the 'Fitness' of persons include:

1. Identification (copy of passport)
2. Compliance with the minimum competency code, where relevant
3. Evidence of professional qualifications
4. Obtain self-certification from the person that they are compliant with any required continuing professional development
5. Record of interview and application where relevant
6. Make all reasonable efforts to obtain references
7. Record of previous experience
8. Record of experience gained outside of Ireland
9. Concurrent responsibilities
    a) Other directorships
    b) Other employments
    c) Other potential conflicts of interest
10. CBI Individual Questionnaire as applicable

Greenval's assessment of the 'Probity' of persons includes considering whether the individual is of good repute and integrity, including an assessment of their honesty and financial soundness which is based on their reputation, reflecting past conduct, criminal record, financial record and supervisory experience. Probity due diligence will include requesting completion of questions on reputation and character and on financial interest.

In compliance with the requirements of the CBI's Fitness and Probity Standards, prior approval for the appointment of certain function holders is obtained by Greenval from the CBI.

B3. Risk Management System including the Own Risk and Solvency Assessment

B3.1. Risk Management System

For its risk management system:

- The Board of Directors has defined its ***risk appetite*** through a top-down approach where the Board has set the overall risk appetite and different tolerances in line with the business strategy. Greenval operates within the risk tolerance limits set by the Board considering the Company's exposure to particular categories of risk, which comprise the risk profile of the Company, which can be controlled, measured and reported. A trigger monitoring and reporting framework based on risk threshold limits (acceptable, warning, immediate action and material deviation) is used to signal activities and reporting requirements. The risk appetite statement and tolerance limits are subject to regular review and amendment to ensure that evolving business strategy, financial capacity, regulatory constraints, other internal/external factors and the needs and input of its stakeholders are appropriately reflected.
- Documented ***risk and internal control policies*** have been established to ensure implementation of the risk management strategy and form part of the risk management framework.
- An ***Own Risk and Solvency Assessment*** is carried out at least on an annual basis as set out in section B.3.3 of this report.

B3.2. Implementation of the Risk Management System including the Risk Management Function

Risk Management Function

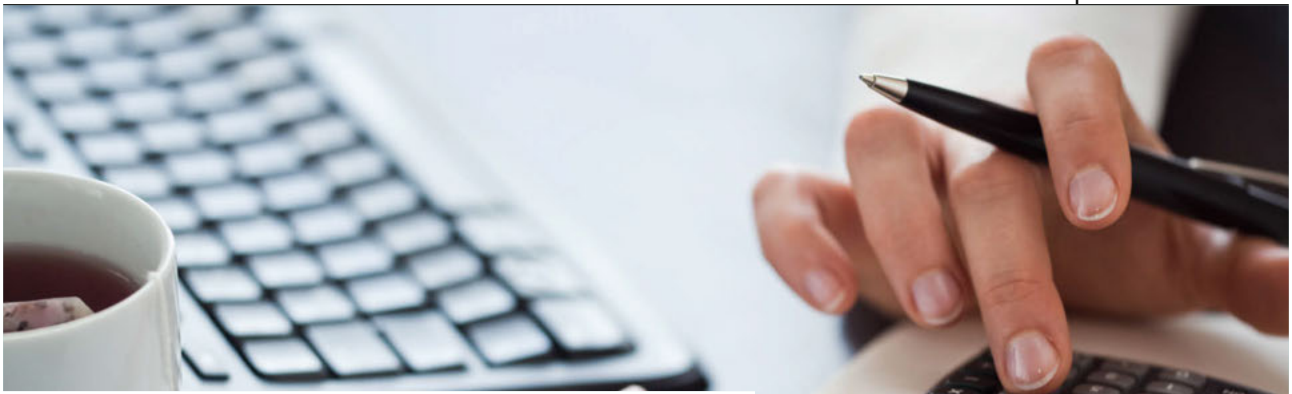
Greenval has appointed a Chief Risk Officer who is responsible for the Risk Management Function as set out in section B.1.1.4 of this report. Note that the Company's CRO resigned during 2023 and was filled on a temporary basis by an external consultant. The CBI notified approval of a proposed permanent appointment on 8 March 2024.

Risk Management Function Responsibilities

The responsibilities of the Risk Management Function include:

- maintaining and monitoring the effectiveness of the Company's risk management system
- ensuring the Company has effective processes in place to identify and manage the risks to which the Company is or might be exposed
- maintaining effective processes to monitor and report the risks to which the Company is or might be exposed
- facilitation of the setting of the risk appetite by the Board
- providing comprehensive and timely information on the Company's material risks which enables the Board to understand the overall risk profile of the Company.

The Chief Risk Officer is responsible for the risk management activities and reports to the Risk Committee and the Board.



B3.3. Own Risk and Solvency Assessment ("ORSA")

ORSA Process

Greenval carries out a regular assessment, at least annually, of its solvency and risks, the ORSA process, which includes:

- **The level of own funds that Greenval needs to hold to cover the ORSA own solvency needs and the regulatory solvency capital requirement**
- **The prospective solvency ratios that Greenval will achieve when realising the business plan over the business planning time horizon**
- **The resilience of these ratios under stress test scenarios**

Greenval will also carry out a non-scheduled ORSA, outside of the regular annual assessment, if there is a significant change in the risk profile of the Company.

Greenval has established and implemented an ORSA policy which describes how the ORSA is performed, internally documented and reviewed.

ORSA Governance

The Board has ultimate responsibility for the ORSA and the role of the Board in the ORSA process is:

- **Directing – how the assessment is to be performed and approving the policy**
- **Challenging – assumptions, methodologies and results**
- **Decision making - taking into account the output from the ORSA**
- **Approval – results and report**

The Board has delegated operational responsibility for the ORSA process as follows:

1. **The Chief Risk Officer is responsible for the ORSA process**
2. **The Managing Director provides day to day oversight**
3. **The Risk Committee is responsible for oversight of the ORSA process**

Final approval of the ORSA process is with the Board.

Determination of Own Solvency Needs

Greenval's Board has determined that the Standard Formula should be used to calculate the SCR and to assess the overall solvency needs of the ORSA. A business planning time horizon of three years is used to project the Solvency II Balance Sheet and SCR at each year end of the business planning time horizon. The base case projections are then subjected to a range of stress tests and scenario analysis to assess the resilience of the solvency position of the Company. The results of the assessment are reviewed by the Board and, where appropriate, potential management actions are agreed.

B3.4. Risk Management System for Internal Model Users

Greenval is not an internal model user and uses the Standard Formula for its SCR and MCR calculation.

B4. Internal Control System

B4.1. Internal Control System

Greenval has established an internal control system that is the overall framework which aims to ensure:

- **The effectiveness and efficiency of the internal operations**
- **The reliability of internal and external information**
- **The security of transactions**
- **The compliance with laws, regulations and internal policies**

The scope of the internal control system covers all activities for which the Company is responsible which includes activities carried out by all departments of Greenval and activities outsourced by the Company to a third party.

The internal control processes of Greenval are aligned with the key policies and procedures established and implemented by the Company. These key policies and procedures and internal control processes are regularly reviewed to ensure a continuous improvement.

Greenval's internal controls are composed of permanent controls and the periodic controls which are complementary but separated and independent from each other.

B4.2. Implementation of the Compliance Function

Compliance Function

Greenval has established a Compliance Function which comprises the Head of Compliance and a Compliance Manager.

Compliance Function Responsibilities

The responsibilities of the Compliance Function include:

- **identifying and assessing the compliance risks impacting the Company**
- **assisting the Board with ensuring ongoing compliance with legislation and applicable requirements**
- **implementing the Group compliance policy and procedures in the Company**
- **enhancing the Company's awareness of compliance matters**
- **acting in an advisory capacity to the Company in relation to compliance and regulatory issues**
- **monitoring the Company's compliance with insurance legislation and applicable requirements and guidelines**
- **documenting any compliance breaches identified, how they were addressed and whether any third party reporting of the breach is required**
- **ensuring that the Board is kept informed of any amendment to the applicable regulations, legislation and guidelines or the addition of any new requirements and the potential impact on the Company**
- **through its opinions, recommendations, monitoring and independent controls providing reasonable assurance of the effectiveness and consistency of the internal processes used to control the compliance of the Company's operations and protect its reputation**
- **Providing adequate input to the overall risk management system in respect of compliance risk**
- **Acting as the contact point for the Company's regulator**

The compliance activities are prioritised using a risk-based approach. They are documented in an annual compliance plan prepared by the Compliance Function which is approved by the Board of Directors. The Head of Compliance is responsible for the compliance plan and monitoring program and reports to the Board of Directors

B5. Internal Audit Function

B5.1. Implementation of the Internal Audit Function

Internal Audit Function

The Internal Audit Function is an independent outsourced function, and constitutes an integral element of the Company's control framework, with a remit to examine and evaluate the functioning, effectiveness and efficiency of the internal control system and all other elements of the system of governance.

The Internal Audit function does not hold any executive responsibilities, other key function responsibilities or any accountability for risk management or systems of internal control, other than to appraise their effectiveness.

Greenval has outsourced its Internal Audit Function to an independent BNP Paribas Group Function, Inspection Generale, as set out in section B.1.1.4 of this report.

Internal Audit Function Responsibilities

The responsibilities of the Internal Audit Function include:

- a) **Establishing, implementing and maintaining an audit plan setting out the audit work to be undertaken, taking into account all activities and the complete system of governance of the Company**
- b) **Taking a risk-based approach in deciding its priorities**
- c) **Reporting the audit plan to the Audit Committee and if requested by the Audit Committee including assignments which are not included in the audit plan**
- d) **Carrying out reviews and submitting a written report on its findings and recommendations to the Audit Committee**

Oversight of Internal Audit Function

The Board of Greenval has delegated responsibility for overseeing the Internal Audit Function of Greenval to the Company's Audit Committee.

The Audit Committee considers as part of their activities the following matters:

- a) **the independence, skill, experience and competency of its Internal Audit Function and internal audit service providers**
- b) **the terms of reference for the Internal Audit Function**
- c) **the budget to be allocated for internal audit services**
- d) **the effectiveness and adequacy of the internal audit plan as proposed by the Internal Audit Function**
- e) **the arrangements, quality and periodicity of the assurance processes**
- f) **the report of audit assignments received from the Internal Audit Function**
- g) **the adequacy of management's response to audit findings and recommendations**

The Audit Committee regularly reviews the organisation, audit plan, audit programme and adequacy of resources to ensure the proper performance of the activities of the Internal Audit Function. The Board and the Audit Committee regularly request internal audit services from a third party service provider to assist the Company's Internal Audit Function to carry out the reviews required. These engagements are one-off in nature and a separate engagement is agreed with the third party service provider for each individual engagement as applicable. The Audit Committee through its Chair reports to the Board on the activities of the Internal Audit Function.

B5.2. Independence of the Internal Audit Function

The effectiveness of the Internal Audit Function depends upon its independence from the day-to-day operations of the business, which allows the objective assessment of evidence to provide an independent opinion or conclusions regarding a process, system or other subject matter.

Greenval's Audit Committee, which is composed of a majority of Independent Non-Executive Directors, and Chaired by an Independent Non-Executive Director, ensures that the Internal Audit Function should not be subject to influence from the Board of Directors, Management and Business Functions of the Company that could impair its independence and impartiality.

The Internal Audit Function, along with its BNP Paribas Group reporting responsibilities, has direct access to the Chair of the Audit Committee, who is an Independent Non-Executive Director. This reporting structure ensures independence of the Internal Audit Function.

Periodically Greenval will engage a third party service provider to assist the Company's Internal Audit Function with carrying out an internal audit assignment. An advantage of using this model to carry out internal audit activity is that it gives the Company a wider array of skills at its disposal to carry out audits of different parts of the business and the people that carry out the reviews and report the findings are clearly independent from the people that work in the areas under review.

B6. Actuarial Function

Actuarial Function

In line with the requirements of Solvency II, and the CBI's 'Domestic Actuarial Regime and Related Governance Requirements under Solvency II', Greenval has appointed a Head of the Actuarial Function ("HoAF"). Jean Rea of KPMG has been engaged on an outsourced basis to provide the HoAF and the appointment has received PCF approval from the CBI.

The HoAF is supported in her role by the Actuarial Department of Greenval.

The activities of the Actuarial Function are split between Greenval's Actuarial Department, under the responsibility of Greenval's Actuarial Manager, who are responsible for the day to day activities, and the activities of the HoAF who provides independent oversight and validation.

Actuarial Function Responsibilities

The responsibilities of the Actuarial Function include:

a) Coordination of the calculation of technical provisions;
b) Ensuring the appropriateness of the methodologies and underlying models used as well as the assumptions made in the calculation of technical provisions;
c) Assessing the sufficiency and quality of the data used in the calculation of technical provisions;
d) Comparing best estimates against experience;
e) Informing the Board of the reliability and adequacy of the calculation of technical provisions;
f) Expressing an opinion on the overall underwriting policy;
g) Expressing an opinion on the adequacy of reinsurance arrangements; and
h) Contributing to the effective implementation of the risk-management system.

B7. Outsourcing

Greenval enters into outsourcing arrangements only where there is a sound commercial basis for doing so, and where the risk can be effectively managed.

The Company has established and implemented an Outsourcing Policy with the objective of:

- **establishing effective oversight of outsourced arrangements to ensure that the use of outsourcing within Greenval does not lead to a decline in the quality of internal controls and operational risk management**
- **ensuring that Greenval considers the additional risks associated with its outsourcing arrangements and enabling Greenval to mitigate the risk inherent with such outsourcing arrangements and control the outsourced functions**

Greenval's Outsourcing Policy sets out the requirements for the following:

- **Roles and Responsibilities**
- **Assessment of Outsourcing Options / Due Diligence**
- **Outsourced Contract and Service Level Agreement**
- **Monitoring Outsourced Arrangements**
- **Business Contingency Plans, including Exit Strategies**
- **Intra Group Outsourcing**
- **Regulatory Notifications**

Refer to section B.1.1.3. for details on the Company's Outsourcing Oversight Committee.

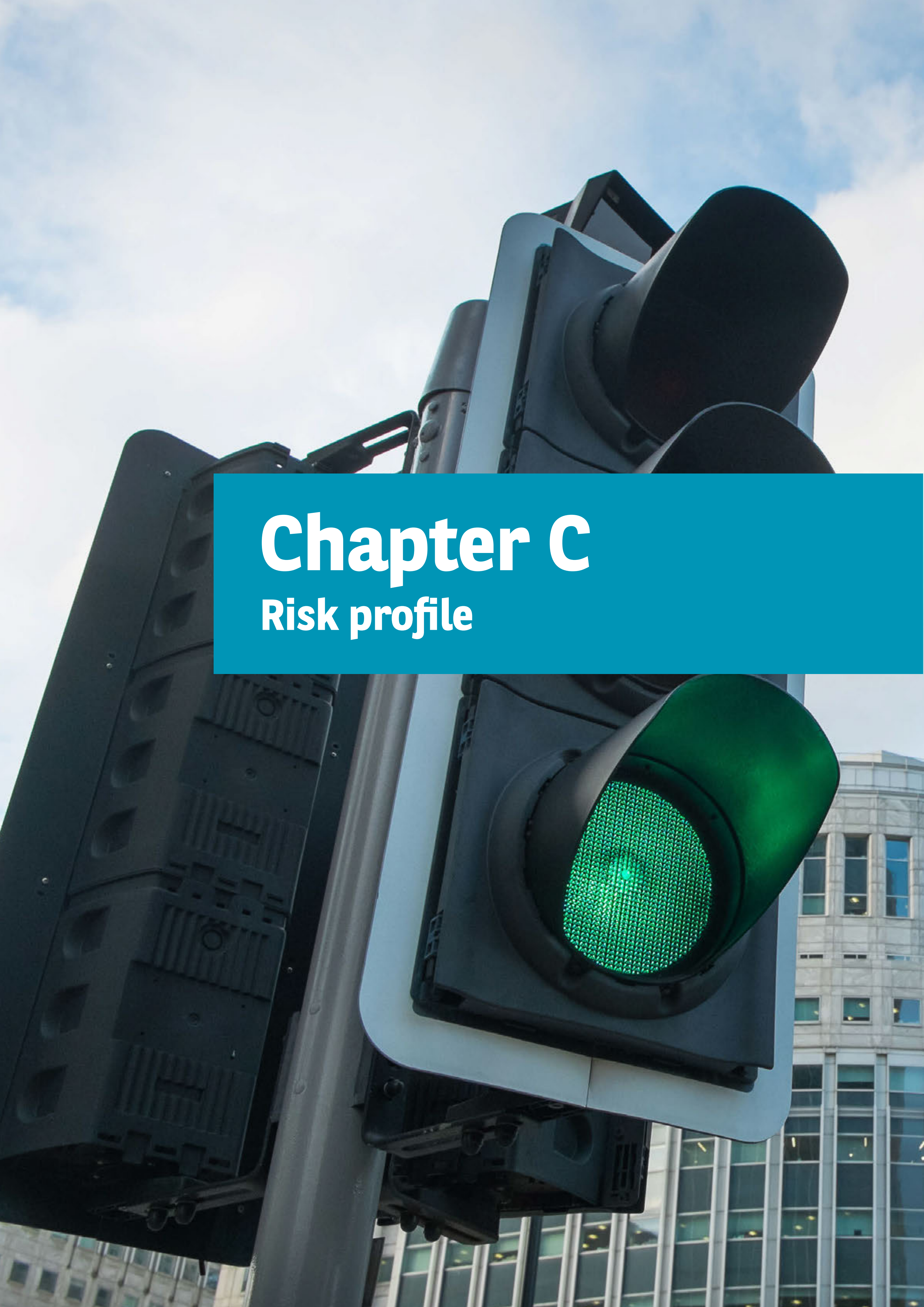
The table below presents the critical or important operational functions or activities that Greenval has outsourced together with the jurisdiction in which the service providers of such functions or activities are located.

Description of Functions or Activities	Jurisdiction
Head of Actuarial Function	Ireland
Internal Audit Function	Ireland
Claims Handling	France, Belgium, Netherlands, Italy, Spain, Portugal, UK, Germany Poland, Denmark, Finland, Czech Republic, Sweden, Slovakia
Policy Administration	France, Belgium, Netherlands, Italy, Spain, Portugal, Germany, Poland, Denmark, Finland, Czech Republic, Sweden
Investment Management	UK
Custodian	Ireland
Human Resource Support and Payroll (including Payroll Agent)	Ireland
Facilities	Ireland
IT Systems and Support (including data storage)	France
Fiscal Representation	UK

B8. Any other information

Greenval's system of governance effectively provides for the sound and prudent management of the business, which is proportionate to the nature, scale and complexity of the operations of the Company.

Chapter C
Risk profile



C1. Underwriting Risk

C1.1. Material Underwriting Risks

Material Underwriting Risks

Greenval defines underwriting risk as the risk of loss or of adverse change in the value of insurance liabilities, due to inadequate pricing and reserving assumptions which is the risk that premiums and current reserves are not sufficient to cover future incurred losses.

Greenval provides non-life motor fleet insurance cover, as set out in section A.1.7 of this report, on a primarily Freedom of Services basis in a number of primarily European Union territories in addition to the UK and Norway, to Arval and Arval fleet customers, in conjunction with Arval's mobility services.

As at the 31st of December 2023 Greenval operates in France, Belgium, Netherlands, Poland, Denmark, Finland, Spain, Portugal, Italy, Germany, Czech Republic, Luxembourg, Sweden, and Slovakia on a direct business basis. Business in the UK, Norway, Hungary, Romania, Slovakia, Spain, Greece and Austria is conducted by way of a reinsurance partnership through a local fronter in these jurisdictions.

The majority of the insurance business underwritten by the Company consists of short tail damage claims, however a proportion of bodily injury claims, may take relatively longer to settle completely. The Company's material underwriting risk exposures relate to pricing risk and reserving risk on the motor insurance products underwritten.

Net written premiums have increased in the year by approximately 22% from €260m in 2022 to €316m in 2023. This increase is primarily due to increased fleet numbers in existing countries and acquisitions within the Arval group. 80% (2022: 83%) of GWP is attributable to business written on a direct basis while 20% (2022: 17%) represents business written via Fronting.

Underwriting Risk Concentrations

Greenval writes fleet motor insurance to the Arval Group and their clients in a number of primarily European Union territories. The most significant concentration of underwriting risk in reference to the Company's liabilities by geographical location exists in France, Belgium, Netherlands, Poland and Spain.

C1.2. Assessment and Risk Mitigation Techniques used for Underwriting Risks

The Company monitors and develops the management of the underwriting risks in accordance with best practice principles and good underwriting discipline.

Greenval has implemented an effective process for assessing and mitigating underwriting risk which includes the following key elements:

- **By establishing and implementing the following policies to direct the underwriting activities:**
  1. **Pricing & underwriting policy**
     - Pricing & Underwriting policy sets out the Company's pricing and underwriting principles and processes, risks allowed to cover in accordance with the risk appetite, approach to managing exposure including key controls for the pricing and underwriting processes and monitoring of the underwriting performance
  2. **Reinsurance policy**
     - Reinsurance is used to mitigate the underwriting risk on retained lines, according to the Company's underwriting risk appetite
     - Reinsurance strategy is reviewed annually by the Risk Committee and the Board to verify that the levels of risk transfer being ceded are commensurate with the Company's risk appetite
     - Reinsurance is obtained from reinsurance counterparties who meet the Company's counterparty security requirements i.e. rated A- or better by Standard & Poor's (or equivalent). While all reinsurance counterparties external to the BNP Paribas Group must be rated A- or better, reinsurance can be obtained from another company of the BNP Paribas Group which can be unrated. If a Group company is unrated Greenval considers the credit rating of BNP Paribas SA, the ultimate parent, and also the requirements of Article 199 of the Solvency II Delegated Acts (that deals with counterparty default) which provides a treatment for 'counterparties who are subject to Solvency II but don't have a rating'.
  3. **Reserving policy**
     - Reserving is conducted in accordance with the Company's reserving policy
     - Periodic reviews of the Company's claims provisions and the adequacy thereof are conducted during the year by the HoAF
     - HoAF, which has been outsourced to Jean Rea of KPMG, provides an annual Actuarial Opinion and Report on Technical Provisions. This opinion confirms the adequacy of the technical provisions.
- **By establishing an Underwriting Department, Claims Management Department, Data Management Department and Actuarial Department:**
  - The Departments are organised to ensure that they are functionally efficient in fulfilling their roles while exercising appropriate, centralised control of all of its responsibilities.
  - The Departments adhere to the Company's pricing and underwriting policy, reinsurance policy and reserving policy as applicable.
- **By establishing a Pricing Committee and Reserving Committee which are Management Committees tasked with overseeing pricing, underwriting and reserving activities.**

There were no material changes to the strategies, policies and processes for mitigating underwriting risk during this reporting period.

C1.3. Risk Sensitivity of Underwriting Risks

The Company carries out stress and scenario testing as part of the ORSA process which includes stress testing for the deterioration of claims experience, a reduction in average premium, increase in average claims costs and an increase in the fleet insured.

Underwriting risk is a key element of the Company's SCR and the results of stress testing clearly demonstrate the key drivers of underwriting risk to the SCR. The stress testing results highlight that there could be a material adverse movement in the solvency position of the Company should the scenarios assessed occur. Nevertheless in the context of the solvency position of the Company at 31st December 2023 the results of the stresses would not be severe enough to impact on the Company's ability to continue to meet its SCR. However, it is anticipated that as projected business volumes grow and annual dividends are paid, that further shareholder support may be required to support this growth.

C2. Market Risk

C2.1. Material Market Risks

Material Market Risks

Greenval defines market risk as the risk of a financial loss (market value and revenue), arising from adverse movements in market parameters which comprise, but are not limited to, foreign exchange rates, interest rates, bond prices and equity prices.

The Company is exposed to market risk on:

- its investment portfolio of fixed income bonds, collective investment undertakings and structured notes
- its assets and liabilities exposed to interest rate movements
- its assets and liabilities denominated in foreign currencies which are exposed to currency risk

The Company's material market risk exposures relate to:

i. Spread risk

- The Company's fixed income bond portfolio and collective investment undertaking portfolio as applicable, is exposed to spread risk where the values of the investments are sensitive to changes in the level or in the volatility of credit spreads

ii. Concentration risk

- The Company's fixed income bond portfolio and collective investment undertaking portfolio as applicable, are exposed to concentration risk which is the sensitivity to an accumulation of exposures on single name counterparties

iii. Equity risk

- The Company is exposed to equity risk through its investments in collective investment undertakings which consist of equity investments in the European Union

iv. Interest rate risk

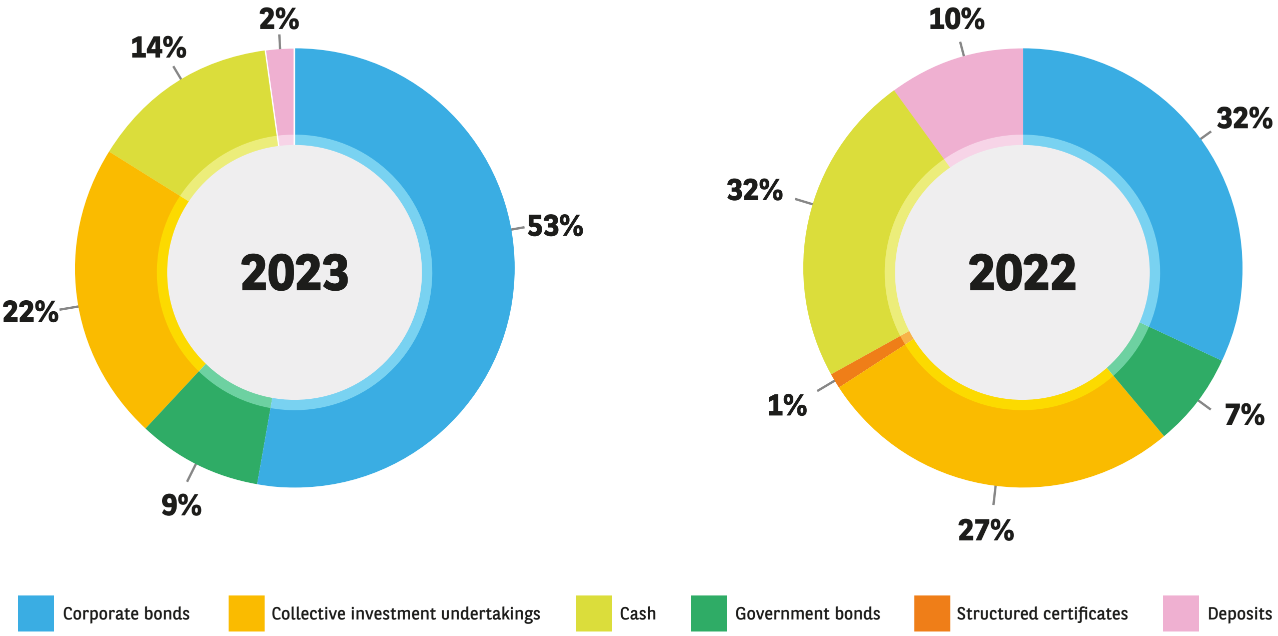
- The Company's fixed income bond portfolio and collective investment undertaking portfolio as applicable, drives the exposure to interest rate risk which arises from asset values being impacted by changes in interest rates
- Future cash flows relating to technical provisions are also exposed to interest rate risk as the discount rates applied to these cash flow projections are impacted by changes in interest rates

v. Currency risk

- The majority of the Company's business is conducted in Euro and hence the exposure to currency risk is low in the context of the business
- However, the Company does undertake certain transactions denominated in foreign currencies and the Company is exposed to foreign currency risk primarily through its assets and liabilities denominated in Polish Zloty ("PLN"), British Pound ("GBP"), Czech Koruna ("CZK") and Swedish Krona ("SEK"). The Company is also exposed, but to a more limited extent, to currency risk on Danish Krone ("DKK"), Hungarian Forint ("HUF"), Norwegian Krone ("NOK") and Romanian Leu ("RON").

Market Risk Concentrations

The following chart provides information regarding the concentration of investments, based on market values at 31st December 2023 and 31st December 2022. Investments are made in compliance with the Company's Investment Policy and Investment Management Agreement, which places constraints on any other type of investment outside the policy.



The table below presents the Company's material foreign exchange risk concentrations at 31st December 2023 and the prior year comparison in Polish Zloty ("PLN"), British Pound ("GBP"), Czech Koruna ("CZK") and Swedish Krona ("SEK") which are the most material exposures to the Company.

	31-Dec-23		31-Dec-22	
Category	Assets	Liabilities	Assets	Liabilities
	€'000	€'000	€'000	€'000
PLN	**10,575**	**(8,494)**	**13,518**	**(11,458)**
GBP	**5,315**	**(4,807)**	**7,072**	**(3,015)**
CZK	**5,676**	**(3,732)**	**3,939**	**(2,674)**

Interest rate risk arises from the Company's investments. The Company manages this risk by adopting approximate asset liability matching criteria to minimise the impact of mismatches between the value of assets and liabilities from interest rate movements. The risk is mitigated by holding a significant proportion of the Company's investments in fixed interest securities with a duration of generally less than five years. The below sensitivity illustrates the impact of a 1% increase in interest rates on Available-for-sale financial assets. A 1% decrease in interest rates would have an equal but opposite effect on shareholders equity.

	Profit before tax 2023	Shareholders' equity 2023	Profit before tax 2022	Shareholders' equity 2022
	€'000	€'000	€'000	€'000
1% increase in interest rates	**-**	**(8,201)**	**-**	**(4,200)**

C2.2. Investments and Prudent Person Principle as applied to Market Risks

Greenval applies the prudent person principle when managing the Company's market risk exposure by adhering to the requirements of the Board approved Investment Policy and Liquidity Policy which stipulates:

- **minimum credit rating limits required for the investment portfolio**
- **maximum exposure allowed to any single counterparty and sector**
- **maximum exposure allowed in equity investments and structured notes**
- **modified duration requirement for the investment portfolio**
- **requirements for asset and liability matching**

C2.3. Assessment and Risk Mitigation Techniques used for Market Risks

Greenval has implemented an effective process for assessing and mitigating market risk which includes the following key elements:

- **By establishing an investment policy which includes the aim of maximising the performance of the Company's investment portfolio while hedging the liability profile of the Company with suitable investments and minimising the risk of loss due to counterparty default. Key requirements of the investment policy include:**
  - minimum credit rating limits required for the investment portfolio thus minimising spread risk and concentration risk
  - maximum exposure allowed to any single counterparty and sector to minimise concentration risk
  - maximum exposure allowed in equity investments, which must be in the form of investment in equities through collective investment undertakings and not direct equity investments, thus minimising the exposure to equity risk
  - modified duration requirement for the investment portfolio with the aim of:
    a) adopting asset liability matching criteria to minimise the impact of mismatches between the value of assets and liabilities from interest rate movements
    b) realising an appropriate duration on the fixed income portfolio thus managing spread risk
  - matching of foreign currency assets to the same currencies as the insurance liabilities thus minimising currency risk
- **By establishing an Investment Committee with an appropriate representation of Management and Non-Executive Directors which meets quarterly to review the investment performance and the investment strategy (including the asset allocation strategy)**
- **By engaging an Investment Manager to assist with implementing the investment strategy while respecting the constraints of the investment policy**

The risk mitigation strategies and policies outlined above are reviewed quarterly by the Investment Committee and/or Board as required to ensure that they are still effective and appropriate for the risk profile of the Company.

There were no material changes to the Company's strategies, policies and processes for mitigating risk aside from this.

C2.4. Risk Sensitivity for Market Risks

The Company carries out stress and scenario testing as part of the ORSA process which includes stress testing for deterioration in credit standing of fixed income bonds held, adverse valuations of fixed income bonds held, equity market distress and increases in interest rates. The result of these tests did not illustrate any doubt on the Company's ability to continue to meet its SCR in context of the level of solvency coverage of the Company at 31st December 2023.

C3. Credit Risk

C3.1. Material Credit Risks

Material Credit Risks

Greenval defines credit risk as the risk of loss, or of adverse change in the financial situation resulting from fluctuations in the credit standing of counterparties and any debtors to which Greenval is exposed.

Greenval has limited appetite for accepting credit risk which it recognises is a risk inherent in its business activities and cannot be fully eliminated. Greenval accepts exposure to credit risk to the extent that the acceptance of the risk optimises the business performance against objectives.

The Company's material credit risk exposures relate to:

i. Amounts due from reinsurers

ii. Amounts due from insurance policyholders and intermediaries

iii. Amounts held on deposit and on demand with banks

The following tables provides information regarding the aggregated credit risk exposure, based on credit ratings, relating to the Company's material credit risk exposures at 31st December 2023 and 31st December 2022.

31st December 2023 EUR'000s	Credit Rating						Total
	AAA	AA	A	BBB	BB	Not Rated	
Available-for-sale financial assets	11,280	26,334	53,580	82,689	-	61,988	235,871
Deposits with credit institutions	-	-	6,898	-	-	-	6,898
Cash and cash equivalents	-	-	38,489	-	-	-	38,489
Reinsurance contract assets	-	7,428	37,440	-	-	-	44,868
Total	**11,280**	**33,762**	**136,407**	**82,689**	**-**	**61,988**	**326,126**

31st December 2022 EUR'000s	Credit Rating						Total
	AAA	AA	A	BBB	BB	Not Rated	
Available-for-sale financial assets	4,562	19,531	38,934	34,765	-	66,869	164,661
Deposits with credit institutions	-	-	23,658	-	-	-	23,658
Cash and cash equivalents	-	-	55,405	-	-	-	55,405
Reinsurance contract assets	-	4,086	31,757	-	-	-	35,843
Total	**4,562**	**23,617**	**149,754**	**34,765**	**-**	**66,869**	**279,567**

Greenval's exposure to unrated securities reduced significantly during 2023 following reduced investment in collective funds, both fixed interest and equity, which are not rated. Underlying assets within these unrated funds are reviewed in line with look through requirements, and in excess of 52% (2022: 57%) of these assets have a credit rating of BBB or greater.

During the year, there were cash transfers of €20m in October and a further €10m in November to the investment portfolio along with the funds from maturity of Santander deposit (€15m), the majority of which was invested into line by line bond portfolio.

The Company's holdings in cash and deposits decreased from €79m to €45m during the period with in excess of 95% of cash and deposit holdings held with BNP entities.

Apart from the above, there was no material change in the Company's credit risk exposure in the reporting period, and no downgrades were observed.

Credit Risk Concentration

The Company is likely to be exposed to concentration of risk with individual reinsurers, due to the nature of the reinsurance market and the restricted range of reinsurers that the Company deals with who have acceptable credit ratings. The Company operates a policy to manage its reinsurance counterparty exposures.

In addition at 31st December 2023:

- in excess of 95% (2022: 97%) of the Company's cash and cash equivalents and deposits other than cash and cash equivalents were held in the BNP Paribas Group.

C3.2. Prudent Person Principle applied to Credit Risks

Greenval applies the prudent person principle when managing the Company's credit risk exposure to counterparties by:

- only selecting counterparties with strong credit ratings
- using multiple counterparties to avoid concentration risk

C3.3. Assessment and Risk Mitigation Techniques used for Credit Risks

Greenval has implemented an effective process for assessing and mitigating credit risk which includes the following key elements:

- **Credit risk exposure to reinsurance counterparties is managed by:**
  - Adherence to the Board approved reinsurance policy which includes that a panel of reinsurers, with a minimum Standard & Poor's credit rating of A- (or equivalent), should form part of the annual reinsurance program. While all reinsurance counterparties external to the BNP Paribas Group must be rated A- or better, reinsurance can be obtained from another company of the BNP Paribas Group which can be unrated. If a Group company is unrated Greenval considers the credit rating of BNP Paribas SA, the ultimate parent, and also the requirements of Article 199 of the Solvency II Delegated Acts (that deals with counterparty default) which provides a treatment for 'counterparties who are subject to Solvency II but don't have a rating'.
  - Reinsurance is shared between a number of reinsurance counterparties to reduce single name exposure
  - Credit ratings of reinsurance counterparties are monitored on an on-going basis.
- **The majority of amounts due from insurance policyholders and intermediaries are due from other BNP Paribas Group companies where Greenval seeks to adhere to four week payment terms.**
- **Credit risk exposure to financial institutions is managed by adherence to the Board approved investment policy which includes that cash deposits should only be placed with financial institutions that have a minimum Standard & Poor's credit rating of A-.**

The risk mitigation strategies and policies outlined above are reviewed at least annually by the Risk Committee, Investment Committee and/or Board as required to ensure that they are still effective and appropriate for the risk profile of the Company.

There were no material changes to the strategies, policies and processes for managing this risk during the reporting period.

C3.4. Risk Sensitivity for Credit Risks

The Company is exposed to concentration of risk with individual reinsurers, due to the nature of the reinsurance market and the restricted range of reinsurers that the Company deal with who have acceptable credit ratings.

The sensitivity of the solvency ratio to a deterioration of the credit standing of its reinsurance counterparties is assessed in the ORSA process. The results of the ORSA suggest that the Company's solvency position can withstand a bankruptcy of its largest reinsurance counterparty by exposure and deterioration in the credit quality step of all other reinsurance counterparties by one step all at the same time.

C4. Liquidity Risk

C4.1. Material Liquidity Risks

Material Liquidity Risks

Greenval defines liquidity risk as the risk of not being able to fund its cash flow requirements as they fall due arising from the Company holding insufficient liquid or other financial resources.

The Company can become illiquid even if it is solvent. Liquidity risk may stem from:

i. timing mismatches between asset maturities/realisation and liability cash flows

ii. problems arising from holding difficult-to sell assets to meet current liabilities

iii. new business, investments or acquisitions that require new funding

The Company's exposure to liquidity risk is considered to be low as it maintains a high level of liquid assets to meet its liabilities. The strong liquidity position is maintained by applying a liquidity policy which seeks to maintain sufficient financial resources to meet its obligations when they fall due. This is achieved through hedging its liability profile with suitable investments to ensure it can meet its liabilities as they fall due.

The following tables provide information on the expected maturity of material financial assets and liabilities at 31st December 2023 and 31st December 2022.

Assets 31st December 2023 (EUR'000s)	Total	Within 1 Year	1-5 Years	5-10 Years	>10 Years	No Maturity
Financial assets	235,871	5,064	98,406	49,279	21,133	61,989
Deposits with credit institutions	6,899	6,899	-	-	-	-
Cash and cash equivalents	38,489	38,489	-	-	-	-
Insurance contract assets	8,034	8,034	-	-	-	-
Reinsurance contract assets	40,545	40,545	-	-	-	-
Other assets	2,002	2,002	-	-	-	-
Total	**331,839**	**101,032**	**98,406**	**49,279**	**21,133**	**61,989**

Assets 31st December 2022 (EUR'000s)	Total	Within 1 Year	1-5 Years	5-10 Years	>10 Years	No Maturity
Financial assets	164,661	11,174	45,811	29,230	11,576	66,869
Deposits with credit institutions	23,658	23,658	-	-	-	-
Cash and cash equivalents	55,405	55,405	-	-	-	-
Insurance contract assets	9,187	9,187	-	-	-	-
Reinsurance contract assets	34,504	34,504	-	-	-	-
Other assets	10,807	10,807	-	-	-	-
Total	**298,222**	**144,735**	**45,811**	**29,230**	**11,576**	**66,869**

* Available-for-sale financial assets comprise Corporate bonds, Government bonds, Collective Investment Undertakings and Structured Notes

Liabilities 31st December 2023 (EUR'000s)	Total	Within 1 Year	1-5 Years	5-10 Years	>10 Years
Insurance contract liabilities	186,613	85,601	55,793	33,745	11,474
Reinsurance contract liabilities	405	136	95	139	35
Other liabilities	6,639	6,639	-	-	-
Current tax liabilities	128	128	-	-	-
Lease liabilities	2,303	258	1,033	1,012	-
Total	**196,088**	**92,763**	**56,920**	**34,895**	**11,509**

Liabilities 31st December 2022 (EUR'000s)	Total	Within 1 Year	1-5 Years	5-10 Years	>10 Years
Insurance contract liabilities	167,612	48,715	64,786	42,830	11,281
Reinsurance contract liabilities	186	47	63	69	6
Other liabilities	5,561	5,561	-	-	-
Current tax liabilities	200	200	-	-	-
Lease liabilities	2,560	287	1,148	1,124	-
Total	**176,120**	**54,811**	**65,997**	**44,023**	**11,287**

There were no material changes in the Company's liquidity risk exposure in the reporting period.

Liquidity Risk Concentrations

Due to the short term nature of the Company's business the majority of the insurance related liabilities are due for payment within 5 years with the largest concentration due within one year.

Greenval as a non-life insurer has designated all investments in fixed income bonds, collective investment undertakings and structured notes as available for sale and therefore can be sold when needed.

While Greenval transacts with various financial institutions, in excess of 95% (2022: 97%) of the Company's cash and cash equivalents and deposits (other than cash and cash equivalents) were held within the BNP Paribas Group at the year end. Under IFRS 9, cash and cash equivalents and deposit cashflows represent Solely Payment of Principal and Interest (SPPI) and credit risk exposure will continue to be disclosed on these financial assets.

C4.2. Prudent Person Principle as applied to Liquidity Risks

Greenval applies the prudent person principle when managing the Company's liquidity risk by:

- **ensuring that the investment portfolio is composed predominantly of marketable securities at all times**
- **ensuring a sizeable level of funding is maintained as cash in bank accounts at all times taking account of the monthly cash flow forecasts prepared to predict required liquidity levels over both the short and medium term**

C4.3. Assessment and Risk Mitigation Techniques used for Liquidity Risks

Greenval has no appetite for liquidity risk and being unable to meet liabilities as they fall due and has implemented an effective process for managing liquidity risk which includes the following key elements:

- **By hedging the liability profile of the Company with suitable investments which ensures that it has sufficient access to liquidity to meet its obligations as they fall due.**
- **By ensuring that the investment portfolio is composed primarily of marketable securities at all times**
- **A sizeable level of funding is maintained as cash in bank accounts at all times**
- **Cash flow forecasting is carried out on a monthly basis by the Company's Finance Department to predict required liquidity levels over both the short and medium term including details on large losses and reinsurance receivables**

The risk mitigation strategies and policies outlined above are reviewed on a quarterly basis by the Investment Committee and/or Board as required to ensure that they are still effective and appropriate for the risk profile of the Company.

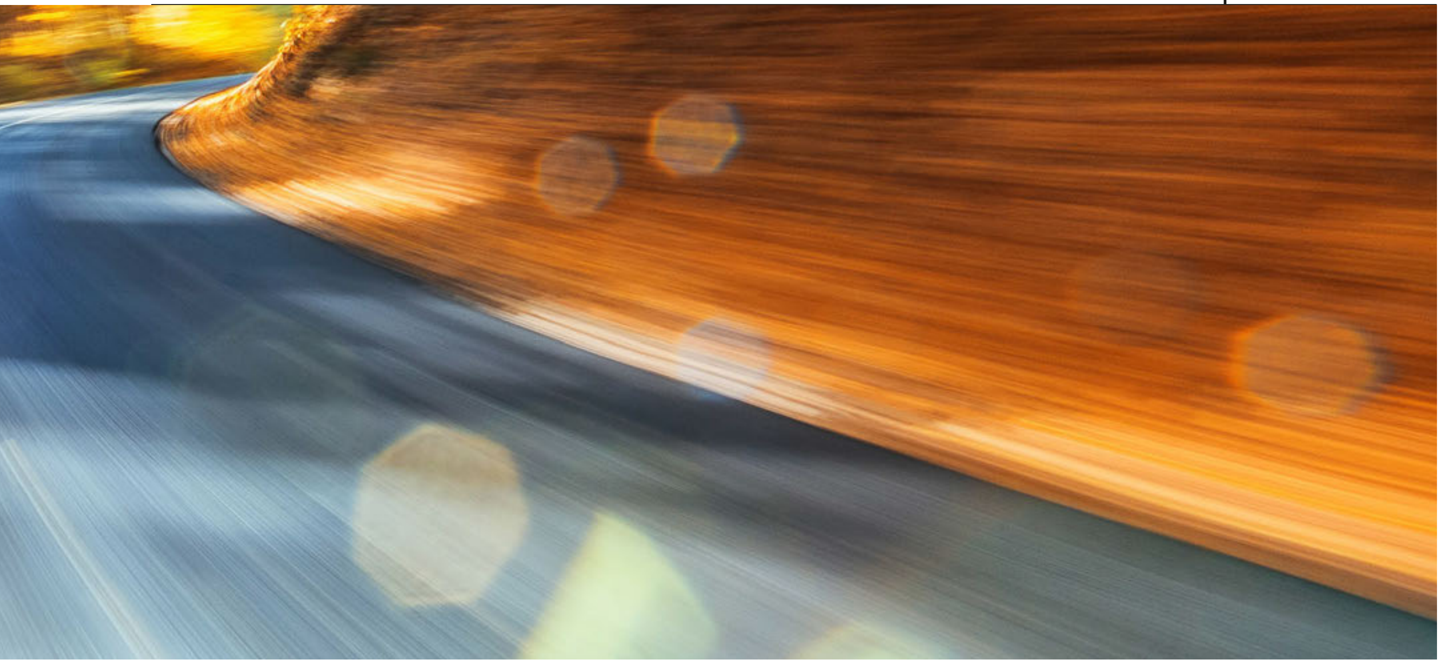
There were no material changes to the strategies, policies and processes for managing this risk during the reporting period.

C4.4. Expected Profit included in Future Premiums

At 31st December 2023 the expected profit included in future premiums is €54m (2022: €38m).

C4.5. Risk Sensitivity for Liquidity Risks

Given the Company's approach and strategy on liquidity it is not a material risk for the Company, and no specific risk sensitivity is provided.



C5. Operational Risk

C5.1. Material Operational Risks

Material Operational Risks

Greenval defines operational risk as the risk of loss resulting from inadequate or failed processes, people and systems or from external events (whether deliberate, accidental or triggered by natural occurrence).

Greenval has limited appetite for accepting operational risk which it recognises is a risk inherent in its business activities and cannot be fully eliminated. The Company's material operational risk exposures relate to:

i. Outsourcing - risk of failure, non-performance, ineffective management and/or oversight of an outsourced service provider

ii. IT Security (including Cyber Security) - risk of the loss or damage arising out of unauthorised access to, use of, disclosure of, disruption of, modification or destruction to information or information systems

iii. Execution, Delivery and Process Management - risk to a service provision arising from a failure to carry out operational processes in an accurate, timely and complete manner

iv. People - risk of inadequate recruitment practices, development, management or retention of employees

v. Data Management – risk that the Company does not have appropriate processes and procedures to ensure accuracy, completeness and appropriateness of data

There were no material changes in the Company's operational risk exposure in the reporting period.

Operational Risk Concentrations

The Company does not have any material concentration of operational risk exposures.

C5.2. Assessment and Risk Mitigation Techniques used for Operational Risks

Greenval has implemented an effective process for managing operational risk:

- by establishing an internal control system that covers all activities for which the Company is responsible which includes activities carried out by all departments of Greenval and activities outsourced by the Company to a third party
- by ensuring that the internal control processes of Greenval are aligned with the key policies and procedures established and implemented by the Company. These key policies and procedures and internal control processes are regularly reviewed to ensure a continuous improvement.

There were no material changes to the strategies, policies and processes for managing this risk during the reporting period.

C5.3. Risk Sensitivity for Operational Risks

During the ORSA process a qualitative assessment of material operational risks is carried out by assessing the impact of a number of scenarios that could impact on the Company. The assessment allows the Company to review and validate its risk mitigation plans and develop contingency plans as applicable.

C6. Other Material Risks

Compliance Risk

Greenval defines compliance risk as the risk of legal, administrative or disciplinary sanctions, together with the financial loss that the Company may suffer as a result of its failure to comply with all the laws, regulations, codes of conduct and standards of good practice applicable to insurance and financial activities (including instructions given by the Board), particularly in application of guidelines issued by a supervisory body.

Greenval has no appetite for failure to comply with legal or regulatory requirements and has implemented an effective process for managing compliance risk which includes the following key elements:

- **By establishing a Compliance Function with an appointed Head of Compliance**
- **By ensuring that intended compliance activities are set out in an annual compliance plan prepared by the Head of Compliance which is approved by the Board.**

Strategic Risk

The Company defines strategic risk as the risk arising from changes in its business environment including macro-economic factors and industry specific considerations and from adverse or improper implementation of business decisions leading to a failure to manage business performance against objectives. Strategic risk is managed through the Board's and Management's on-going oversight of Company strategy and its development.

Cyber Risk

The Board and Management of Greenval are aware of its ultimate responsibility for the robustness of its IT security (including cyber security). Greenval maintains an IT Security plan that:

i. **Ensures the secure operation of the business**

ii. **Ensures the confidentiality, integrity and availability of information**

iii. **Protects data, policyholders, employees and colleagues**

iv. **Complies with regulatory requirements**

Climate Change Risk

Climate change is no longer an emerging risk and Greenval appreciates the increasing impact that Climate Change risk is having. The frequency and severity of extreme weather events, such as hurricanes, floods, and in particular, hailstorms are concerning. These events can cause extensive damage to vehicles, resulting in a higher number of insurance claims and is impacting society. Greenval as an insurance undertaking believes that in conducting our motor insurance business activity, we have a key role to play in the transition to sustainable mobility while supporting a climate neutral society. Climate change is an important component of our Strategic Objectives and our Risk Management Framework. Greenval provides natural catastrophe events insurance cover on its motor own damage product on an annual reviewable basis which may potentially be impacted by climate change. The Company has appropriate reinsurance cover in place as part of its reinsurance strategy. The Company does not have a large exposure to climate change risk pertaining to its investment portfolio.

The Board of Greenval is responsible for making sure that all risks, inclusive of climate change risks are effectively identified, managed, and controlled. The Risk Committee and the Board has taken the necessary steps to ensure this area is understood and that the integration of the management of climate change risks is part of business as usual. In addition, Management, the Risk Committee, and the Board have been kept abreast of Climate Change risk and the importance of this for Greenval. The necessary training has taken place to ensure that the approach to the assessment and ongoing management of our exposure to climate change risk is fit for purpose. As a direct result of climate change, the frequency and severity of natural catastrophes is expected to increase. Improved climate projections provide evidence that future climate change will increase climate-related extremes in many European regions where our customers vehicles are insured. Indeed, the losses on our insurance program during 2019-2023 as a direct result of climate change has already resulted in our business initiating key mitigation measures to help mitigate exposures to climate change risk.

Claims Frequency & Inflation

Volatility in claims frequency represents a significant area of uncertainty. In 2022 frequency began to return to pre-Covid levels; however, there is evidence of a continuing lower level of frequency in some territories reflecting the post-Covid lower mileage. Greenval monitored this situation closely and the impact of increases and decreases in claims frequency is summarised below.

Impact Net Claims	2023	2022
	€'000	€'000
-10%	**(21,722)**	**(16,542)**
-5%	**(10,861)**	**(8,271)**
+5%	**10,861**	**8,271**
+10%	**21,722**	**16,542**

The Company observed an increase in claims costs in 2022 and 2023 largely reflecting inflationary cost increases, especially on MOD claims. A specific inflation adjustment has been included in the Company's reserves.

C7. Any Other Information

Recovery Plan

To comply with the Central Bank (Supervision and Enforcement) Act 2013 (Section 48(1)) (Recovery Plan Requirements for Insurers) Regulations 2022 Greenval maintains a Recovery Plan providing for measures to be taken by the Company to restore its financial position or maintain its viability following a significant deterioration of its financial situation.

The Recovery Plan is a stand-alone document and is part of the Company's Risk Management Framework, with links between the Recovery Plan and other documents and processes that are in place e.g. Risk Appetite Statement, Capital Management, ORSA, Solvency & Financial Condition Report, Regular Supervisory Report and operational resilience / business continuity plans.

The Board formally assesses and approves each version of the Recovery Plan with the first recovery plan approved on 30th March 2022.

The Recovery Plan will be periodically reviewed and updated if necessary, and such reviews will be completed within twenty-four months of preparation of the recovery plan or its last review. The first such review was approved by the Board on 19th March 2024.

No other relevant information.

Chapter D

Valuation for solvency purposes

D1. Assets

The following table presents a summary of the Solvency II valuation of assets compared to the IFRS financial statements at 31st December 2023 and 31st December 2022 and information on material classes of assets is provided thereunder. 2022 financial statements are restated for the application of IFRS 17 and IFRS 9.

Balance sheet

Assets	31-Dec-23 Solvency II Value	31-Dec-23 Statutory Accounts Value	31-Dec-23 Difference	31-Dec-22 Solvency II Value	31-Dec-22 Statutory Accounts Value	31-Dec-22 Difference
Deferred tax assets	619	619	-	2,416	1,417	**999**
Property, plant & equipment held for own use	2,248	2,952	**(704)**	2,383	3,224	**(841)**
Government Bonds	24,624	24,624	-	17,890	17,890	-
Corporate Bonds	149,259	149,259	-	76,930	76,930	-
Structured notes	-	-	-	2,972	2,972	-
Collective Investments Undertakings	61,988	61,988	-	66,869	66,869	-
Deposits other than cash equivalents	6,898	6,898	-	23,658	23,658	-
Reinsurance recoverables	29,309	40,545	**(11,236)**	21,525	34,504	**(12,979)**
Deposits to cedants	4,925	-	**4,925**	4,911	-	**4,911**
Insurance and intermediaries receivables	-	8,034	**(8,034)**	5,191	9,187	**(3,996)**
Reinsurance receivables	-	-	-	256	-	**256**
Receivables (trade, not insurance)	-	-	-	9,824	-	**9,824**
Cash and cash equivalents	38,489	38,489	-	55,405	55,405	-
Any other assets, not elsewhere shown	2,350	2,351	**(1)**	983	11,035	**(10,052)**
Total assets	**320,709**	**335,759**	**(15,050)**	**291,213**	**303,090**	**(11,877)**

The most notable movements from the preceding year are observed in:

- Corporate Bonds with an increase of €72m,
- Cash and cash equivalents with a decrease of €17m,
- Deposits other than cash equivalents with a decrease of €17m, and
- Government Bonds with an increase of €7m.

The following describes the bases, methods and main assumptions used by the Company for the valuation of assets for solvency purposes:

Property, plant & equipment held for own use

- Property, plant & equipment held for own use includes right-of-use assets held by the Company and recorded under IFRS 16. Right-of-use assets are measured initially at cost less depreciation. There is no difference to the IFRS and Solvency II valuation basis and method.
- Other property, plant and equipment held for own use by the Company is included under IFRS. This includes software assets, IT equipment and other leasehold assets. These are excluded under Solvency II.
- No significant estimates or judgements are used in the valuation of these investments.

Government and Corporate Bonds

- Government and corporate bonds held are quoted investments, valued in an active market with daily prices and liquidity available on the stock exchange where the bonds are listed.
- No significant estimates or judgements are used in the valuation of these investments.
- These investments are carried at fair value under Solvency II and IFRS and hence there is no difference to the valuation basis and method.

Collective Investment Undertakings

- Collective investment undertakings are quoted investments in an active market with regular net asset values available.
- No significant estimates or judgements are used in the valuation of these investments.
- These investments are carried at fair value under Solvency II and IFRS and hence there is no difference to the valuation basis and method.

Cash and Cash Equivalents and Deposits other than Cash Equivalents

- Cash and cash equivalents and deposits other than cash equivalents are valued at fair value by the relevant financial institution, and the Company receives regular statements to confirm the balances held. Amounts not denominated in EUR are translated into EUR at the period end for reporting purposes.
- There are no significant estimates or judgements used in valuing cash holdings due to the nature of the asset.
- Cash and cash equivalents and deposits other than cash equivalents are carried at fair value under Solvency II and IFRS and hence there is no difference to the valuation basis and method.

Reinsurance recoverables

- Reinsurance recoverables are estimated in a manner consistent with the outstanding claims provisions or settled claims associated with the reinsured policies and in accordance with the relevant reinsurance contract.
- The Company has reinsurance recoverables of €29.3m (2022: €21.5m) on a Solvency II basis compared to the IFRS 17 value of €40.5m (2022: €34.5m). This difference of €11.2m (2022: €12.9m) reflects:
  - Solvency II premium provisions on a net basis exceeding those on a gross basis giving rise to a negative reinsurance recoverable;
  - The impact of discounting, i.e., IFRS 17 discounting reflects the inclusion of an illiquidity premium ; and
  - An allowance required under Solvency II for expected reinsurance counterparty default.

Deposits to cedants

- In 2023 the Company provided collateral via a loss deposit fund of €4.9m (2022: €4.9m) under the reinsurance treaty pertaining to the UK business.
- There are no significant estimates or judgements used in valuing deposits to cedants due to the nature of the asset.
- Deposits to cedants are carried at fair value under Solvency II; under IFRS 17 deposits to cedants are not shown separately but included within the calculation of insurance liabilities.

Insurance and intermediaries receivables

- Insurance receivables, which generally have 30-day terms, are recognised and valued at original invoice amount less an allowance for any uncollectible items. An estimate for doubtful debts is made when collection of the full amount is no longer probable. Bad debts are written off when identified.
- This balance mainly represents outstanding premium owed by policyholders and due to the short term nature of these receivables no significant estimates or adjustment to the valuation is required.
- The variance of €8.0m (2022: €4.0m) between IFRS 17 and Solvency II reflects the difference in the two bases. The IFRS 17 value represents groups of contracts which are in an asset position; the Solvency II value represents receivables not included within the technical provisions.

Receivables (trade, not insurance)

- These balances principally comprise amounts due from BNP Paribas Group companies.
- No significant estimates or judgements are used in the valuation of these receivables.
- There are no differences between Solvency II valuation and IFRS valuation of these receivables.

Any other assets, not elsewhere shown

- These balances comprise a number of asset balances with the only material balance being:
  - Cash held in Claims Handlers' bank accounts for claim payments. These accounts are in the name of the relevant claims handler and Greenval transfers funds to these accounts upon receipt of the monthly claims bordereau and notification of claims settlements. At 31st December 2023 and 31st December 2022, Greenval had assets in Euro ("EUR") and Danish Krone ("DKK") in these accounts with DKK amounts being translated into EUR at the period end for reporting purposes.
  - These accounts are valued at fair value by the relevant financial institution and Greenval receives regular bank statements to confirm the balances held. This balance amounted to €2.4m at 31 December 2023 and €0.9m at 31 December 2022.
  - No significant estimates or judgements are used in the valuation of other assets.
  - There is no difference to the valuation basis and method from IFRS to Solvency II.

The following assets are recognised on an IFRS basis but not for solvency purposes:

a) Property, plant & equipment held for own use other than right-of-use assets

- Property, plant and equipment comprise mainly of information technology ("IT") and Leasehold improvements which is valued using the cost model i.e. cost less accumulated depreciation in line with IAS 37 under IFRS. However, the Solvency II framework stipulates that "intangible assets, other than goodwill, are recognised in the Solvency II balance sheet at a value other than zero only if they can be sold separately and the insurance and reinsurance undertaking can demonstrate that there is a value for the same or similar assets that has been derived from quoted market prices in active markets. Bespoke computer software tailored to the needs of the undertaking, "off the shelf" software licences that cannot be sold to another user shall be valued at zero". Taking this into consideration it was determined that the IT assets that the Company held and the leasehold improvements made to the Company's registered office could not be sold separately and hence no value has been accounted for this in the Solvency II Balance Sheet.

There were no changes to the recognition and valuation bases used by the Company for the valuation of assets for solvency purposes during the reporting period.

D2. Technical provisions

The introduction of IFRS 17 requires further explanation in the walkthrough from the Statutory Accounts to Solvency II.

The following tables provides a summary of the movements to get from IFRS 17 to Solvency II, with additional detail below.

Solvency II Total Technical Provisions

Component	Gross Technical Provisions	Reinsurance Recoverables	Net Technical Provisions
Undiscounted IFRS 17 LIC	254,524,382	50,084,543	204,439,839
Remove IFRS 17 Expenses	-	-	-
Remove IFRS 17 ENID	(15,880,028)	(6,001,288)	(9,878,740)
Remove Risk Adjustment	(15,499,472)	(5,274,929)	(10,224,543)
Other adjustments related to IFRS17	4,910,835	(602,783)	5,513,618
Claims provision future premium	(60,713,895)	(4,727,450)	(55,986,445)
Unexpired premium and claims cashflows	(6,207,635)	(562,798)	(5,644,837)
WBNYI premium and claim cashflows	(101,519,609)	(6,285,007)	(95,234,602)
ENID	25,579,725	5,997,387	19,582,338
Expenses	47,919,021	-	47,919,021
Reinsurer Default	-	(708,287)	708,287
Impact of discounting	(21,660,756)	(2,610,668)	(19,050,088)
Risk Margin	15,415,891	-	15,415,891
Solvency II Total Technical Provisions	**126,868,459**	**29,308,720**	**97,559,739**

Solvency II Claims Technical Provisions

Component	Gross Technical Provisions	Reinsurance Recoverables	Net Technical Provisions
Undiscounted IFRS LIC	254,524,382	50,084,543	204,439,839
Remove IFRS 17 expenses	-	-	-
Remove IFRS 17 ENID	(15,880,028)	(6,001,288)	(9,878,740)
Remove Risk Adjustment	(15,499,472)	(5,274,929)	(10,224,543)
Other adjustments related to IFRS 17	4,910,835	(602,783)	5,513,618
Undiscounted SII Expenses	2,456,508	-	2,456,508
Undiscounted SII ENID	15,880,028	6,001,288	9,878,740
Undiscounted Future Premium	(60,713,895)	(4,727,450)	(55,986,445)
Total Discounting	(13,367,773)	(2,645,498)	(10,722,275)
Reinsurer Default	-	(671,125)	671,126
Solvency II Claims Technical Provisions	**172,310,585**	**36,162,758**	**136,147,827**

Solvency II Premium Technical Provisions

Component	Gross Technical Provisions	Reinsurance Recoverables	Net Technical Provisions
Unexpired (undiscounted)			
Future premiums	(35,863,408)	(857,899)	(35,005,509)
UPR Received	5,661,981	-	5,661,981
Future claims	23,993,793	295,101	23,698,692
Future expenses	6,364,835	-	6,364,835
ENID	1,050,161	(4)	1,050,165
WBNYI (undiscounted)			
Future premiums	(297,401,975)	(9,151,028)	(288,250,948)
Future claims	195,882,367	2,866,021	193,016,346
Future expenses	39,097,678	-	39,097,678
ENID	8,649,536	(3,897)	8,653,433
Total Discounting	**(8,292,983)**	**34,829**	**(8,327,812)**
Total RI Default	**-**	**(37,162)**	**37,162**
Solvency II Premium Technical Provisions	**(60,858,015)**	**(6,854,029)**	**(54,003,977)**

The tables below present the valuation of technical provisions for each material line of business as defined by Solvency II, at 31st December 2023 and 31st December 2022. The technical provisions comprise the best estimate of claims provisions, the best estimate of premiums provisions and the risk margin.

Technical Provisions (EUR'000s) 31/12/2023	Direct business and accepted proportional reinsurance					Accepted non-proportional reinsurance	Total Life Non-Life Obligations
	Medical expense insurance	Motor vehicle liability insurance	Other motor insurance	Legal expenses insurance	Miscellaneous financial loss	Non-proportional casualty reinsurance	
Total Best Estimate Gross	(10,776)	130,279	(1,126)	215	(7,295)	(365)	110,931
Risk Margin	350	13,094	1,813	41	5	68	15,371
Total Gross Technical Provisions	**(10,426)**	**143,373**	**687**	**256**	**(7,291)**	**(297)**	**126,302**

Technical Provisions (EUR'000s) 31/12/2022	Direct business and accepted proportional reinsurance					Accepted non-proportional reinsurance	Total Life Non-Life Obligations
	Medical expense insurance	Motor vehicle liability insurance	Other motor insurance	Legal expenses insurance	Miscellaneous financial loss	Non-proportional casualty reinsurance	
Total Best Estimate Gross	320	112,692	(9,452)	315	(6,358)	(265)	97,252
Risk Margin	174	11,435	1,428	26	46	28	13,137
Total Gross Technical Provisions	**494**	**124,127**	**(8,024)**	**341**	**(6,312)**	**(237)**	**110,389**

The following tables present a summary of the Solvency II valuation of technical provisions compared to the IFRS financial statements at 31st December 2023 and 31st December 2022.

Technical Provisions (EUR'000s)	31-Dec-23 Solvency II Value	31-Dec-23 Statutory Accounts Value	31-Dec-23 Difference	31-Dec-22 Solvency II Value	31-Dec-22 Statutory Accounts Value	31-Dec-22 Difference
Technical provisions – non-life	**136,728**	**186,613**	**(49,885)**	**109,894**	**167,612**	**(57,718)**
Best Estimate	121,707			96,931		
Risk margin	15,021			12,963		
Technical provisions - health (similar to non-life)	**(10,426)**	**-**	**(10,426)**	**494**	**-**	**494**
Best Estimate	(10,776)			320		
Risk margin	350			174		
Total Technical Provisions	**126,302**	**186,613**	**(60,311)**	**110,388**	**167,612**	**(57,224)**

For the valuation of technical provisions for solvency purposes adjustments are applied to the Statutory Accounts technical provisions as presented in the tables below.

Technical Provisions (EUR'000s) 31/12/2023	Solvency II Value	Statutory Accounts Value	Difference
Best Estimate of Claims Provisions/BE LIC	171,789	218,804	(47,015)
LIC Risk Adjustment	-	15,474	(15,474)
LRC	-	(55,698)	55,698
Best Estimate of Premiums Provisions	(60,858)	-	(60,858)
Risk Margin	15,371	-	15,371
Total	**126,302**	**178,579**	**(52,277)**

Technical Provisions (EUR'000s) 31/12/2022	Solvency II Value	Statutory Accounts Value	Difference
Best Estimate of Claims Provisions/BE LIC	143,748	155,941	(12,193)
LIC Risk Adjustment	-	14,171	(14,171)
LRC	-	(11,687)	11,687
Best Estimate of Premiums Provisions	(46,497)	-	(46,497)
Risk Margin	13,137	-	13,137
Total	**110,388**	**158,425**	**(48,037)**

The IFRS claims reserves are calculated using a range of standard actuarial deterministic models, including chain-ladder and Bornhuetter-Ferguson methods. Expert judgement is applied to select the most appropriate methods, assumptions and parameters for each reserving segment.

In addition to the assumptions used to determine the IFRS best estimate reserves, further assumptions are required to calculate the Solvency II technical provisions, including:

- **The inclusion of premiums receivable for expired periods in claims provisions;**
- **The inclusion of reinsurance payables for expired periods in claims provisions;**
- **The inclusion of events not in the data ("ENIDs");**
- **The valuation of unexpired risks;**
- **The valuation of bound but not incepted ("BBNI") business;**
- **The impact of discounting; and**
- **The inclusion of the risk margin.**

A risk margin of €15.4m (2022: €13.1m) is calculated, by determining the cost of providing an amount of eligible own funds equal to the SCR necessary to support the insurance and reinsurance obligations over the lifetime thereof. The rate used in the determination of the cost of providing that amount of eligible own funds is called the cost of capital rate, currently set at 6%.

The IFRS 4 UPR and premiums receivables are replaced by the IFRS liability for remaining coverage (LRC).

In addition to the unexpired business, the premium provisions also include future cash flows relating to business that was bound but not incepted ("BBNI") at 31st December 2023.

The premium provisions for this business comprise:

- **Expected future premium income;**
- **Expected future claim payments;**
- **Expected future acquisition costs; and**
- **Expected future overhead expenses.**

A substantial proportion of Greenval's business is renewed annually on 1st January; as a result the volume of premiums considered to be BBNI is considerably higher than would be the case were the business to renew uniformly throughout the year.

The Company has a reinsurance recoverable of €29.3m (2022: €21.5m) on a Solvency II basis compared to the Statutory Accounts value of €40.5m (2022: €37.7m). This difference of €11.2m reflects:

- **The removal of the ceded LRC in the Solvency II reinsurance recoverable;**
- **Solvency II premium provisions on a net basis exceeding those on a gross basis giving rise to a negative reinsurance recoverable;**
- **The impact of discounting; and**
- **A defined allowance required for Solvency II for expected reinsurance counterparty default.**

The key areas of uncertainty associated with the value of technical provisions include:

- **The fact that the best estimate selected is only one of a range of possible best estimates and alternative values could have reasonably been selected;**
- **The appropriateness, completeness and accuracy of the data used to calculate the best estimate; and**
- **Possible future legislative changes affecting the settlement of technical provisions.**

The Company does not apply the:

- **matching adjustment referred to in Article 77b of Directive 2009/138/EC**
- **transitional deduction referred to in Article 308d of Directive 2009/138/EC**
- **transitional risk-free interest rate-term structure referred to Article 308c of Directive 2009/138/EC**
- **volatility adjustment referred to in Article 77d of Directive 2009/138/EC.**

D3. Other liabilities

The following table presents a summary of the Solvency II valuation of other liabilities compared to the IFRS financial statements at 31st December 2023 and 31st December 2022 and information on material classes of liabilities is provided thereunder.

	31-Dec-23			31-Dec-22		
Other Liabilities	Solvency II Value	Statutory Accounts Value	Difference	Solvency II Value	Statutory Accounts Value	Difference
Deferred tax liabilities	5,795	784	**5,011**	5,860	-	**5,860**
Insurance & intermediaries payables	-	-	**-**	1,223	4,562	**(3,339)**
Reinsurance payables	-	405	**(405)**	-	1,524	**(1,524)**
Payables (trade, not insurance)	9,070	9,070	**-**	6,934	6,934	**-**
Any other liabilities, not elsewhere shown	-	-	**-**	2,559	2,559	**-**
Total Other Liabilities	**14,865**	**10,259**	**4,606**	**16,576**	**15,579**	**997**

The following describes the bases, methods and main assumptions used by the Company for the valuation of other liabilities for solvency purposes:

Insurance & Intermediaries Payables

- **Insurance and Intermediaries payable includes the following material amounts:**

  a) Commission payable to intermediaries of €0.0m (2022: €0.5m)

  - Amounts due relate to commission payable to intermediaries and is calculated in accordance with the terms and conditions of the contract with the intermediary.
  - There is a high degree of certainty over the economic outflow due to the relatively short timeframe between the commission liabilities arising and the intermediary receiving payment from the Company.
  - The value of this commission payable in the financial statements is the same as for Solvency II with no significant estimates or judgements used in the valuation of these payables
  - The reduction in the Insurance & Intermediaries Payables from IFRS to Solvency II reflects the exclusion of Unearned Premium payables which are recorded with the Solvency II premium provisions.

Reinsurance Payables

- This balance is in respect of amounts owed to reinsurers, in respect of reinsurance agreements in place.
- The amounts payable are calculated in accordance with the reinsurance agreements and final statements received.
- No estimation methods, adjustments for future value or valuation judgements are required for these balances. The timing of expected economic outflows to settle the liability with each reinsurer is contractually based, and in the normal course of business is within three months of the reporting date.
- Under Solvency II, this balance has been included for expired periods in claims provisions.

Payables (trade, not insurance)

- **Payables (trade, not insurance) are carried at cost, which is the fair value of the consideration to be paid in the future for goods and services received, whether or not billed to the Company.**
- **These comprise the following material classes of liabilities:**

  a) General accruals of €3.2m (2022: €2.3m) comprising general business expense accruals for professional fees, training costs, IT costs and others.

  b) Insurance Premium Tax ("IPT") payable of €3.5m (2022: €3.1m). This amount represents the amount outstanding to fiscal authorities. The amounts payable are calculated in accordance with premium information received and relevant country IPT rates and monthly statements received.

  c) Lease liabilities amounting to €2.3m
- **No significant estimates or judgements are used in the valuation of these liabilities.**

Deferred tax liabilities

- **Deferred tax is provided on all timing differences that have originated but not reversed at the Balance sheet date, where transactions or events that result in an obligation to pay more tax in the future or a right to pay less tax in the future have occurred.**
- **Timing differences are temporary differences between profits as computed for tax purposes and profits as stated in the financial statements, which arise because of certain items of income and expenditure in the financial statements which are dealt with in different years for tax purposes.**
- **The increase in the deferred tax liability from IFRS to Solvency II reflects the increase in own funds on a Solvency II basis.**

Any other liabilities, not elsewhere shown

- **Any other liabilities includes the lease liability for the new office premises as included in Property, plant & equipment for own use. The liability is recorded in conjunction with the requirements of IFRS 16 and includes the lease liability amortised over the life time of the lease term, and includes any provisions for dismantling & rehabilitation.**
- **The lease is recorded at present value under both Solvency II and IFRS.**

The Company participates in a defined contribution scheme operated by BNP Paribas Ireland Unlimited Company whereby it offers all employees the choice of making contributions into a defined contribution pension scheme, which the Company will match up to a limit. Once the contributions have been paid the Company has no further payment obligations. The assets of the scheme are held separately from those of the Company in an independently administered fund. Differences between the amounts charged in the income statement and payments made to the scheme are treated as assets or liabilities. The Company does not participate in a defined benefit plan.

There were no changes to the recognition and valuation bases used by the Company for the valuation of other liabilities for solvency purposes during the reporting period.

D4. Alternative methods for valuation

The Company does not use any alternative methods for valuation.

D5. Any other information

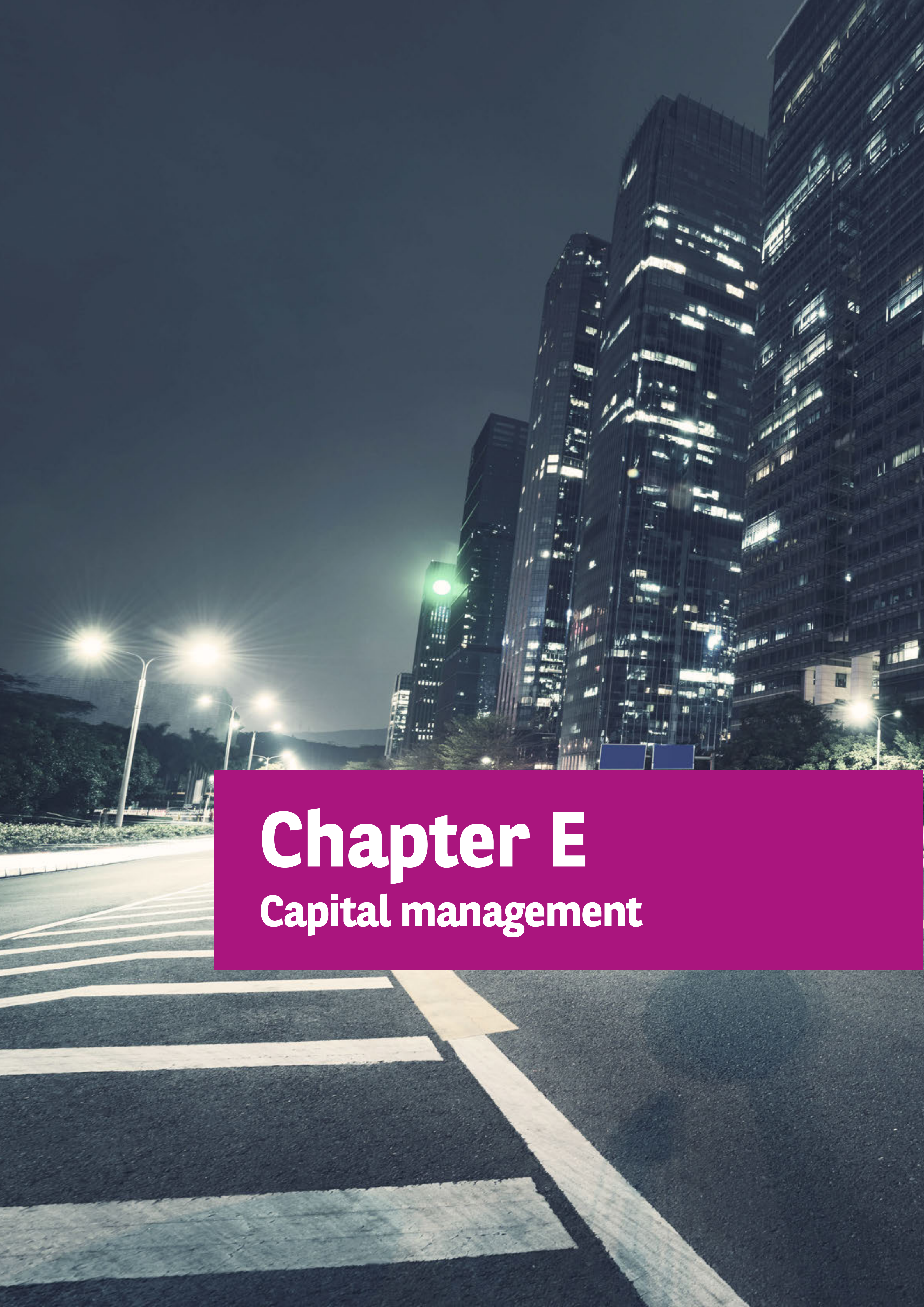
In assessing the Going Concern assumption of the Company, the Directors considered the Strategic Plan and an Own Risk and Solvency Assessment ("ORSA") for the Company. This includes reviews of solvency, liquidity and assessment of principal risks and risk management over a period from 2023 to 2026. The scenarios projected as part of the ORSA process included a range of estimates based on the various underwriting, market, credit, and operational risks identified by the Company and the results of these stress tests forms part of the Company's capital risk appetite including decisions on dividend payments.

Refer to the appendix 2 of this report for the following quantitative reporting templates:

- **S.02.01.02 - Balance Sheet**
- **S.05.01.02 - Premiums, claims and expenses by line of business**
- **S.05.02.01 - Premiums, claims and expenses by country**
- **S.17.01.02 - Non-Life Technical Provisions**
- **S.19.01.21 - Non-life insurance claims information**

Refer also to information included at section A.5 of this report.

There is no other material information regarding the valuation of assets and liabilities for solvency purposes.



Chapter E
Capital management

E1. Own funds

E1.1. Information on the Objectives, Policies and Processes for Managing Own Funds

Capital Management Objective

Greenval seeks at all times to hold sufficient eligible capital over its business planning time horizon of 3 years:

- to meet its current and projected business activities
- to ensure it can continue its business on a going concern basis
- to comply with the regulatory requirements set by the CBI
- to maximise the return to its sole shareholder

Dividends

As part of its capital management strategy the Company considers on an annual basis its ability to pay a dividend to its sole shareholder, Arval Service Lease SA. Dividends are paid out of the retained earnings of its statutory accounts provided that capital is maintained to provide a capital structure for the Company to support its existing business activities, planned business strategies and to meet legal and regulatory requirements. The dividend policy of the Company is to pay on an annual basis a dividend corresponding to the retained earnings of its statutory accounts at the previous year end. A dividend will not be paid or will be deferred if doing so would cause the Company to breach its legal and regulatory requirements or fall below the acceptable risk appetite tolerance limit for solvency margin cover. Prior to declaring any dividends, the Company will obtain the necessary approvals from its Board and Shareholder as required.

Monitoring and Reporting

Greenval's solvency position is assessed, including a full calculation of the SCR, at each quarter end and reported to Management, Risk Committee and the Board.

The Company's Board approved risk appetite statement contains a trigger monitoring and reporting framework based on risk appetite tolerance limits (acceptable, warning, immediate action and material deviation) which is used to signal activities and the escalation of reporting requirements. The risk appetite statement contains tolerance limits for solvency margin cover.

As part of its annual ORSA the Board considers the following over the business planning time horizon:

- the capital management plan
- the application of the dividend policy
- the scenarios that could trigger it seeking capital from its sole shareholder

E1.2. Own Funds Classified by Tiers

The table below presents own funds at 31st December 2023 and 31st December 2022 by tiers. All the Company's own funds are classified as tier 1 unrestricted.

Tier 1 Unrestricted - Own Funds (EUR'000s)	Opening Balance at 31/12/2022	Movement in Period	Closing Balance at 31/12/2023
Paid in Ordinary Share Capital	49,950	-	49,950
Capital Contributions	10,000	-	10,000
Reconciliation Reserve	104,300	14,726	119,026
Total Tier 1 Unrestricted Own Funds	**164,250**	**14,726**	**178,976**

The Company has received approval from the CBI to include all capital contributions as Tier 1 unrestricted own funds for solvency purposes.

Details of the reconciliation reserve are included in section E1.4.

E1.3. Eligibility of Own Funds

The Company's own funds are all classified as Tier 1 unrestricted and are available to cover the SCR and MCR.

None of the Company's own fund items are subject to transitional arrangements and the Company has no ancillary own funds. No deductions are applied to own funds items and there are no restrictions affecting their availability and transferability.

E1.4. Deferred Taxes

The Company recognised a deferred tax asset at the 31st December 2023 of €0.6m (2022: €2.4m). This arises due to the mark-to-market losses incurred in the Company's investment portfolio.

The Company recognised a deferred tax liability of €5.8m at 31st December 2023 (2022: €5.9m) which arises from the revaluation of assets and liabilities when applying Solvency II principles.

E1.5. Material difference between Equity as shown in the Financial Statements and the Excess of Assets over Liabilities calculated for solvency purposes

The tables below present the material difference between equity as shown in the financial statements prepared on an IFRS basis and the excess of assets over liabilities calculated for solvency purposes at 31st December 2023 and 31st December 2022.

	31-Dec-23			31-Dec-22		
Own Funds (EUR'000s)	Statutory Accounts Balance Sheet Equity	Adjustments for Solvency Purposes	Solvency II Balance Sheet Excess of Assets over Liabilities	Statutory Accounts Balance Sheet Equity	Adjustments for Solvency Purposes	Solvency II Balance Sheet Excess of Assets over Liabilities
Ordinary Share Capital	49,950	-	49,950	49,950	-	49,950
Capital Contributions	10,000	-	10,000	10,000	-	10,000
Revaluation Reserve	(4,374)	-	(4,374)	(16,908)	-	(16,908)
Retained Earnings	77,825	-	77,825	74,330	-	74,330
IFRS 4-IFRS 17 Reconciliation Reserve	5,486	-	5,486			
Difference in the valuation of assets	-	(15,049)	(15,049)	-	(62,463)	(62,463)
Difference in the valuation of technical provisions (non-life)	-	60,311	60,311	-	110,337	110,337
Difference in the valuation of technical provisions (life)	-	(566)	(566)	-	-	-
Difference in the valuation of other liabilities	-	(4,606)	(4,606)	-	(997)	(997)
Total	**138,887**	**40,089**	**178,976**	**117,372**	**46,877**	**164,249**

Adjustment for Solvency Purposes

The following summarises the adjustment for solvency purposes of €40.1m (2022: €46.9m) above:

- **Difference in valuation of assets of -€15.0m (2022: -€62.5m)**
  - Refer to section D.1. of this report
- **Difference in valuation of technical provisions of €60.1m (2022: €110.3m)**
  - Refer to section D.2. of this report
- **Difference in valuation of other liabilities of -€5m (2022: €1.0m)**
  - Refer to section D.3. of this report

Reconciliation Reserve

The table below presents the reconciliation reserve which comprises the excess of assets over liabilities of the Solvency II Balance Sheet less issued share capital and capital contributions. Capital contributions are approved by the CBI as Tier 1 unrestricted own funds.

Reconciliation Reserve (EUR'000s)	31-Dec-2023	31-Dec-2022
Solvency II Balance Sheet - Excess of assets over liabilities	178,976	164,249
Ordinary Share Capital	(49,950)	(49,950)
Capital Contributions	(10,000)	(10,000)
Reconciliation Reserve	**119,026**	**104,299**
Represented by		
Difference in the valuation of assets	(15,049)	(62,463)
Difference in the valuation of technical provisions	60,877	110,337
Difference in the valuation of other liabilities	(5,739)	(997)
Revaluation Reserve from the Statutory Accounts	(4,374)	(16,908)
Retained earnings from Statutory Accounts	77,825	74,330
IFRS 4-IFRS 17 Reconciliation Reserve	5,486	
Reconciliation Reserve	**119,026**	**104,299**

E2. Solvency Capital Requirement and Minimum Capital Requirement

E2.1. Amount of Solvency Capital Requirement and Minimum Capital Requirement

The table below presents the SCR and MCR at 31st December 2023 and 31st December 2022.

Capital Requirement (EUR'000s)	31-Dec-2023	31-Dec-2022
Solvency Capital Requirement	107,509	83,535
Minimum Capital Requirement	36,012	30,165

Increase in the SCR during the reporting period is in line with expectations as the Company's underwriting and investment activities continue to grow.

E2.2. Solvency Capital Requirement split by Risk Modules

The tables below present the SCR at 31st December 2023 and 31st December 2022 split by risk modules.

Risk Modules (EUR'000s)	31-Dec-2023	31-Dec-2022
Market Risk	27,051	21,023
Counterparty Default Risk	12,900	4,938
Life Underwriting Risk	7	-
Health Underwriting Risk	9,512	6,206
Non-Life Underwriting Risk	94,148	76,323
Diversification	(30,902)	(21,073)
Intangible asset risk	-	-
Basic Solvency Capital Requirement	**112,716**	**87,417**
Operational Risk	10,151	8,051
Loss Absorbing Capacity of Deferred Taxes	(15,358)	(11,934)
Solvency Capital Requirement	**107,509**	**83,534**

Undertaking specific parameters or simplified calculations are not used for any of the risk modules or sub-modules.

E2.3. Inputs used to calculate the Minimum Capital Requirement

The tables below show the inputs into the MCR calculation as at 31st December 2023 and 31st December 2022.

Inputs to MCR Calculation (EUR'000s) 31-Dec-2023 (Non-Life)	Net (of reinsurance/SPV) best estimate	Net (of reinsurance) written premiums in the last 12 months
Medical expense insurance and proportional reinsurance	-	17,740
Motor vehicle liability insurance and proportional reinsurance	108,890	156,459
Other motor insurance and proportional reinsurance	-	129,049
Legal expenses insurance and proportional reinsurance	257	1,473
Miscellaneous financial loss insurance and proportional reinsurance	-	11,551
Non-proportional property reinsurance	-	-

Inputs to MCR Calculation (EUR'000s) 31-Dec-2023 (Life)	Net (of reinsurance/SPV) best estimate and TP calculated as a whole
Obligations with profit participation - guaranteed benefits	-
Obligations with profit participation - future discretionary benefits	-
Index-linked and unit-linked insurance obligations	-
Other life (re)insurance and health (re) insurance obligations	73

Inputs to MCR Calculation (EUR'000s) 31-Dec-2022	Net (of reinsurance/SPV) best estimate	Net (of reinsurance) written premiums in the last 12 months
Medical expense insurance and proportional reinsurance	677	10,772
Motor vehicle liability insurance and proportional reinsurance	93,050	129,570
Other motor insurance and proportional reinsurance	-	110,807
Legal expenses insurance and proportional reinsurance	315	173
Miscellaneous financial loss insurance and proportional reinsurance	-	9,676
Non-proportional property reinsurance	-	-

The overall MCR calculation is presented in the table below. Using the inputs in the table above results in a Linear MCR of €36.0m (2022: €30.2m).

Overall MCR Calculation (EUR'000s)	31-Dec-2023	31-Dec-2022
Linear MCR	36,012	30,165
SCR	107,509	83,535
MCR cap	48,379	37,591
MCR floor	26,877	20,884
Combined MCR	36,012	30,165
Absolute floor of the MCR	4,000	4,000
Minimum Capital Requirement	**36,012**	**30,165**

E2.4. Material Changes to the Solvency Capital Requirement and to the Minimum Capital Requirement

The increase in the SCR and MCR is in line with the overall growth of the business.

E2.5. Loss Absorbing Capacity of Deferred Taxes ("LACDT")

The Company has recognised a LACDT of €15.4m at 31st December 2023 (2022: €11.9m).

Recoverability of the LACDT is confirmed by the recoverability of tax losses through business as usual tax planning, being the total of the following:

i. Deferred tax liability on the Solvency II balance sheet at 31st December 2023

ii. Amount of tax recoverable from the Revenue Commissioners in the current year by the carry back of unused tax losses to the prior period to reclaim tax paid the extent permitted by the Revenue Commissioners

There is sufficient capacity within the BNP Ireland tax group to fully utilise this loss relief provision.

E3. Use of the duration-based equity risk sub-module in the calculation of the Solvency Capital Requirement

Greenval uses the Standard Formula to calculate its SCR and MCR and does not use the duration-based equity risk sub-module in the calculation of the SCR.

E4. Differences between the Standard Formula and any Internal Model Used

Greenval uses the Standard Formula, and not an internal model, to calculate its SCR and MCR.

E5. Non-compliance with the Minimum Capital Requirement and Non-Compliance with the Solvency Capital Requirement

There were no instances of non-compliance with the MCR and the SCR for Greenval during the reporting period ended 31st December 2023 or 31st December 2022.

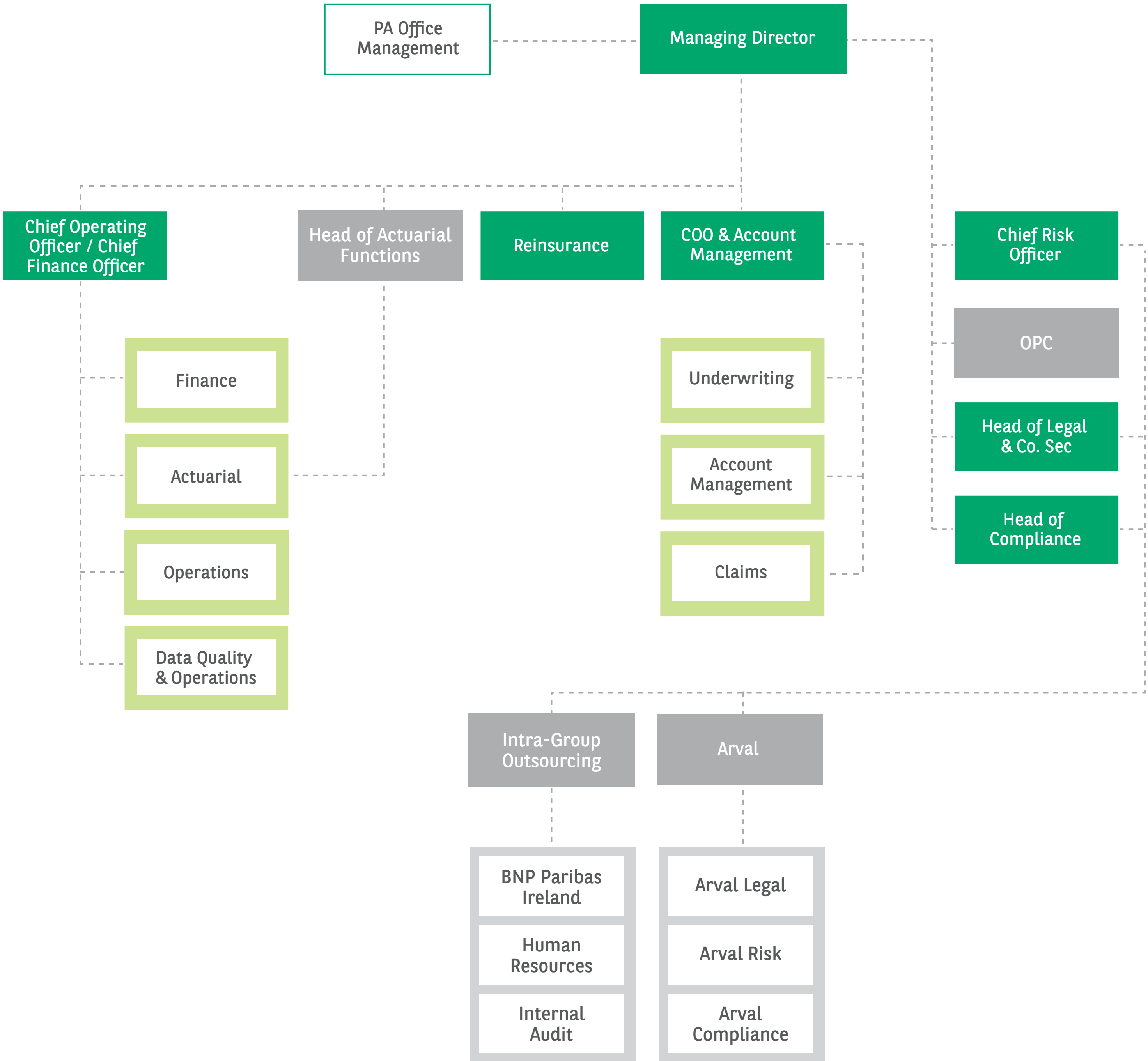
E6. Any other information

There is no other material information regarding the capital management of Greenval that has not been disclosed in section E above.

Refer to the appendix 2 to this report for the following quantitative reporting templates:

- S.23.01.01 – Own Funds
- S.25.01.21 - Solvency Capital Requirement - for undertakings on Standard Formula
- S.28.01.01 - Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity

Appendix 1
Greenval Organisation Chart



Appendix 2

Quantitative Reporting Templates 31st DECEMBER 2023
All amounts expressed in €'000

S.02.01.02
Balance sheet

		Solvency II value
		C0010
Assets		
Intangible assets	R0030	-
Deferred tax assets	R0040	619
Pension benefit surplus	R0050	-
Property, plant & equipement held for own use	R0060	2,248
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	242,769
Property (other than for own use)	R0080	-
Holdings in related undertakings, including participations	R0090	-
Equities	R0100	-
Equities - listed	R0110	-
Equities - unlisted	R0120	-
Bonds	R0130	173,882
Government Bonds	R0140	24,624
Corporate Bonds	R0150	149,258
Structured notes	R0160	(0)
Collateralised securities	R0170	-
Collective Investments Undertakings	R0180	61,988
Derivatives	R0190	-
Deposits other than cash equivalents	R0200	6,898
Other investments	R0210	-
Assets held for index-linked and unit-linked contracts	R0220	-
Loans and mortgages	R0230	-
Loans on policies	R0240	-
Loans and mortgages to individuals	R0250	-
Other loans and mortgages	R0260	-
Reinsurance recoverables from:	R0270	29,309
Non-life and health similar to non-life	R0280	28,861
Non-life excluding health	R0290	28,896
Health similar to non-life	R0300	(35)
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	448
Health similar to life	R0320	-
Life excluding health and index-linked and unit-linked	R0330	448
Life index-linked and unit-linked	R0340	-
Deposits to cedants	R0350	4,925
Insurance and intermediaries receivables	R0360	-
Reinsurance receivables	R0370	-
Receivables (trade, not insurance)	R0380	-
Own shares (held directly)	R0390	-
Amounts due in respect of own fund items or initial fund called up but not yet paid	R0400	-
Cash and cash equivalents	R0410	38,489
Any other assets, not elsewhere shown	R0420	2,350
Total assets	**R0500**	**320,709**

S.02.01.02
Balance sheet

Liabilities		Solvency II value C0010
Technical provisions – non-life	R0510	126,302
Technical provisions – non-life (excluding health)	R0520	136,728
TP calculated as a whole	R0530	-
Best Estimate	R0540	121,707
Risk margin	R0550	15,021
Technical provisions - health (similar to non-life)	R0560	(10,426)
TP calculated as a whole	R0570	-
Best Estimate	R0580	(10,776)
Risk margin	R0590	350
Technical provisions - life (excluding index-linked and unit-linked)	R0600	566
Technical provisions - health (similar to life)	R0610	-
TP calculated as a whole	R0620	-
Best Estimate	R0630	-
Risk margin	R0640	-
Technical provisions – life (excluding health and index-linked and unit-linked)	R0650	566
TP calculated as a whole	R0660	-
Best Estimate	R0670	521
Risk margin	R0680	45
Technical provisions – index-linked and unit-linked	R0690	-
TP calculated as a whole	R0700	-
Best Estimate	R0710	-
Risk margin	R0720	-
Contingent liabilities	R0740	-
Provisions other than technical provisions	R0750	-
Pension benefit obligations	R0760	-
Deposits from reinsurers	R0770	-
Deferred tax liabilities	R0780	5,795
Derivatives	R0790	-
Debts owed to credit institutions	R0800	-
Financial liabilities other than debts owed to credit institutions	R0810	-
Insurance & intermediaries payables	R0820	-
Reinsurance payables	R0830	-
Payables (trade, not insurance)	R0840	9,070
Subordinated liabilities	R0850	-
Subordinated liabilities not in BOF	R0860	-
Subordinated liabilities in BOF	R0870	-
Any other liabilities, not elsewhere shown	R0880	-
Total liabilities	**R0900**	**141,733**
Excess of assets over liabilities	**R1000**	**178,976**

S.04.05.21 - 1
Premiums, claims and expenses by country

	Home Country	Top 5 countries: non-life	Top 5 countries: non-life	Top 5 countries: non-life	Top 5 countries: non-life	Top 5 countries: non-life
Country		FR	NL	BE	PL	IT
Premiums written (gross)						
Gross Written Premium (direct)		60,846,096	23,052,718	26,633,574	53,508,007	41,413,136
Gross Written Premium (proportional reinsurance)	65,227,850					
Gross Written Premium (non-proportional reinsurance)						
Premiums earned (gross)						
Gross Earned Premium (direct)		60,846,096	37,631,719	26,633,574	51,014,085	40,095,837
Gross Earned Premium (proportional reinsurance)	55,285,652					
Gross Earned Premium (non-proportional reinsurance)						
Claims incurred (gross)						
Claims incurred (direct)		44,326,770	24,877,079	13,412,818	32,542,354	35,271,432
Claims incurred (proportional reinsurance)	43,229,589					
Claims incurred (non-proportional reinsurance)						-5,534
Expenses incurred (gross)						
Gross Expenses Incurred (direct)		9,144,103	4,244,182	2,594,509	7,716,517	4,718,095
Gross Expenses Incurred (proportional reinsurance)	7,837,109					
Gross Expenses Incurred (non-proportional reinsurance)						

S.04.05.21 - 2
Premiums, claims and expenses by country

		Home Country	Top 5 countries: life and health SLT
		C0030	C0040
Country	R1010		FI
Gross Written Premium	R1020		
Gross Earned Premium	R1030		
Claims incurred	R1040		566,187
Gross Expenses Incurred	R1050		

S.04.05.21 - 2
Premiums, claims and expenses by country

		Home Country	Top 5 countries: life and health SLT
		C0030	C0040
Country	R1010		FI
Gross Written Premium	R1020		
Gross Earned Premium	R1030		
Claims incurred	R1040		566,187
Gross Expenses Incurred	R1050		

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

		Line of Business for: **non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)**								
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance
		C0010	**C0020**	**C0030**	**C0040**	**C0050**	**C0060**	**C0070**	**C0080**	**C0090**
Premiums written										
Gross - Direct Business	**R0110**	17,740	-	-	124,647	110,676	-	-	-	-
Gross - Proportional reinsurance accepted	**R0120**	-	-	-	41,622	23,606	-	-	-	-
Gross - Non-proportional reinsurance accepted	**R0130**									
Reinsurers' share	**R0140**	-	-	-	9,810	5,233	-	-	-	-
Net	**R0200**	**17,740**	**-**	**-**	**156,459**	**129,049**	**-**	**-**	**-**	**-**
Premiums earned										
Gross - Direct Business	**R0210**	18,098	-	-	131,513	112,510	-	-	-	-
Gross - Proportional reinsurance accepted	**R0220**	-	-	-	33,300	21,986	-	-	-	-
Gross - Non-proportional reinsurance accepted	**R0230**									
Reinsurers' share	**R0240**	-	-	-	10,304	5,249	-	-	-	-
Net	**R0300**	**18,098**	**-**	**-**	**154,509**	**129,247**	**-**	**-**	**-**	**-**
Claims incurred										
Gross - Direct Business	**R0310**	7,229	-	-	73,773	102,681	-	-	-	-
Gross - Proportional reinsurance accepted	**R0320**	-	-	-	24,669	18,560	-	-	-	-
Gross - Non-proportional reinsurance accepted	**R0330**									
Reinsurers' share	**R0340**	-	-	-	1,782	12,667	-	-	-	-
Net	**R0400**	**7,229**	**-**	**-**	**96,659**	**108,574**	**-**	**-**	**-**	**-**
Changes in other technical provisions										
Gross - Direct Business	**R0410**	-	-	-	-	-	-	-	-	-
Gross - Proportional reinsurance accepted	**R0420**	-	-	-	-	-	-	-	-	-
Gross - Non- proportional reinsurance accepted	**R0430**									
Reinsurers'share	**R0440**	-	-	-	-	-	-	-	-	-
Net	**R0500**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
Expenses incurred	**R0550**	**855**	**-**	**-**	**27,546**	**16,064**	**-**	**-**	**-**	**-**
Other expenses	**R1200**									
Total expenses	**R1300**									

		Line of Business for: **non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)**			Line of business for: **accepted non-proportional reinsurance**				Total
		Legal expenses insurance	Assistance	Miscellaneous financial loss	Health	Casualty	Marine, aviation, transport	Property	
		C0100	**C0110**	**C0120**	**C0130**	**C0140**	**C0150**	**C0160**	**C0200**
Premiums written									
Gross - Direct Business	**R0110**	1,473	-	11,552					**266,088**
Gross - Proportional reinsurance accepted	**R0120**	-	-	-					**65,228**
Gross - Non-proportional reinsurance accepted	**R0130**				-	-	-	-	**-**
Reinsurers' share	**R0140**	-	-	-	-	-	-	-	**15,043**
Net	**R0200**	**1,473**	**-**	**11,552**	**-**	**-**	**-**	**-**	**316,272**
Premiums earned									
Gross - Direct Business	**R0210**	1,468	-	11,554					**275,143**
Gross - Proportional reinsurance accepted	**R0220**	-	-	-					**55,285**
Gross - Non-proportional reinsurance accepted	**R0230**				-	-	-	-	**-**
Reinsurers' share	**R0240**	-	-	-	-	-	-	-	**15,552**
Net	**R0300**	**1,468**	**-**	**11,554**	**-**	**-**	**-**	**-**	**314,876**
Claims incurred									
Gross - Direct Business	**R0310**	165	-	962					**184,810**
Gross - Proportional reinsurance accepted	**R0320**	-	-	-					**43,229**
Gross - Non-proportional reinsurance accepted	**R0330**				-	(6)	-	-	**(6)**
Reinsurers' share	**R0340**	-	-	-	-	(447)	-	-	**14,002**
Net	**R0400**	**165**	**-**	**962**	**-**	**441**	**-**	**-**	**214,031**
Changes in other technical provisions									
Gross - Direct Business	**R0410**	-	-	-					**-**
Gross - Proportional reinsurance accepted	**R0420**	-	-	-					**-**
Gross - Non- proportional reinsurance accepted	**R0430**				-	-	-	-	**-**
Reinsurers'share	**R0440**	-	-	-	-	-	-	-	**-**
Net	**R0500**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
Expenses incurred	**R0550**	**172**	**-**	**1,812**	**-**	**-**	**-**	**-**	**46,449**
Other expenses	**R1200**								**-**
Total expenses	**R1300**								**46,449**

		Line of Business for: **life insurance obligations**						**Life reinsurance obligations**		Total
		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**	-	-	-	-	-	-	-	-	-
Reinsurers' share	**R1420**	-	-	-	-	-	-	-	-	-
Net	**R1500**	-	-	-	-	-	-	-	-	-
Premiums earned										
Gross	**R1510**	-	-	-	-	-	-	-	-	-
Reinsurers' share	**R1520**	-	-	-	-	-	-	-	-	-
Net	**R1600**	-	-	-	-	-	-	-	-	-
Claims incurred										
Gross	**R1610**	-	-	-	-	-	566	-	-	566
Reinsurers' share	**R1620**	-	-	-	-	-	448	-	-	448
Net	**R1700**	-	-	-	-	-	118	-	-	118
Changes in other technical provisions										
Gross	**R1710**	-	-	-	-	-	-	-	-	-
Reinsurers' share	**R1720**	-	-	-	-	-	-	-	-	-
Net	**R1800**	-	-	-	-	-	-	-	-	-
Expenses incurred	**R1900**	-	-	-	-	-	-	-	-	-
Other expenses	**R2500**									-
Total expenses	**R2600**									-

S.12.01.01
Life and Health SLT Technical Provisions

		Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Total (Life other than health insurance, incl. Unit-Linked)
		C0090	C0150
Technical provisions calculated as a whole	R0010	0.00	0.00
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	0.00	0.00
Technical provisions calculated as a sum of BE and RM			
Best Estimate			
Gross Best Estimate	R0030	521,353.04	521,353.04
Total recoverables from reinsurance/SPV and Finite Re before the adjustment for expected losses due to counterparty default	R0040	470,490.15	470,490.15
Recoverables from reinsurance (except SPV and Finite Re) before adjustment for expected losses	R0050	470,490.15	470,490.15
Recoverables from SPV before adjustment for expected losses	R0060	0.00	0.00
Recoverables from Finite Re before adjustment for expected losses	R0070	0.00	0.00
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0080	448,055.14	448,055.14
Best estimate minus recoverables from reinsurance/SPV and Finite Re	R0090	73,297.90	73,297.90
Risk Margin	R0100	44,834.53	44,834.53
Amount of the transitional on Technical Provisions			
Technical Provisions calculated as a whole	R0110	0.00	0.00
Best estimate	R0120	0.00	0.00
Risk margin	R0130	0.00	0.00
Technical provisions - total	R0200	566,187.57	566,187.57
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	R0210	118,132.43	118,132.43
Best Estimate of products with a surrender option	R0220	0.00	0.00
Gross BE for Cash flow			
Cash out-flows			
Future guaranteed and discretionary benefits	R0230	632,894.64	632,894.64
Future guaranteed benefits	R0240		
Future discretionary benefits	R0250		
Future expenses and other cash out-flows	R0260	0.00	0.00
Cash in-flows			
Future premiums	R0270	0.00	0.00
Other cash in-flows	R0280	0.00	0.00
Percentage of gross Best Estimate calculated using approximations	R0290	0.0000	
Surrender value	R0300	0.00	0.00
Best estimate subject to transitional of the interest rate	R0310	0.00	0.00
Technical provisions without transitional on interest rate	R0320	0.00	0.00
Best estimate subject to volatility adjustment	R0330	0.00	0.00
Technical provisions without volatility adjustment and without others transitional measures	R0340	0.00	0.00
Best estimate subject to matching adjustment	R0350	0.00	0.00
Technical provisions without matching adjustment and without all the others	R0360	0.00	0.00
Expected profits included in future premiums (EPIFP)	R0370	0.00	0.00

Gross TP Amount calculated using simplified methods	RTT01		

S.12.01.02
Life and Health SLT Technical Provisions

		Insurance with profit participation	Index-linked and unit-linked insurance	Index-linked and unit-linked insurance: Contracts without options and guarantees	Index-linked and unit-linked insurance: Contracts with options or guarantees	Other life insurance	Other life insurance: Contracts without options and guarantees	Other life insurance: Contracts with options or guarantees	Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Accepted reinsurance	Accepted reinsurance: Insurance with profit participation	Accepted reinsurance: Index-linked and unit-linked insurance	Accepted reinsurance: Other life insurance	Accepted reinsurance: 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)
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150
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	-		-	-		-	-	521		-	-	-	-	-
Total Recoverables from reinsurance/SPV and Finite Re after	R0080	-		-	-		-	-	448		-	-	-	-	-
Best estimate minus recoverables from reinsurance/SPV and	R0090			-	-		-	-	73		-	-	-	-	
Risk margin	R0100	-	-			-			45	-					-
Amount of the transitional on Technical Provisions															
Technical Provisions calculated as a whole	R0110	-	-			-			-	-					-
Best estimate	R0120	-		-	-		-	-	-		-	-	-	-	-
Risk margin	R0130	-	-			-			-	-					-
Technical provisions - total	R0200	-	-			-			566	-					-

		Health insurance (direct business)	Health insurance (direct business): Contracts without options and guarantees	Health insurance (direct business): 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)
		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		-	-	-	-	-
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	R0090		-	-			
Risk margin	R0100	-			-	-	-
Amount of the transitional on Technical Provisions							
Technical Provisions calculated as a whole	R0110	-			-	-	-
Best estimate	R0120		-	-	-	-	-
Risk margin	R0130	-			-	-	-
Technical provisions - total	R0200	-			-	-	-

S.17.01.02
Non-life Technical Provisions

		Direct business and accepted proportional reinsurance								
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100
Technical provisions calculated as a whole	R0010	-	-	-	-	-	-	-	-	-
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole	R0050	-	-	-	-	-	-	-	-	-
Technical provisions calculated as a sum of BE and RM										
Best estimate										
Premium provisions										
Gross	R0060	(14,172)	-	-	(21,983)	(17,276)	-	-	-	-
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140	(101)	-	-	(5,247)	(1,391)	-	-	-	-
Net Best Estimate of Premium Provisions	R0150	**(14,071)**	**-**	**-**	**(16,736)**	**(15,885)**	**-**	**-**	**-**	**-**
Claims provisions										
Gross	R0160	3,396	-	-	152,262	16,150	-	-	-	-
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240	(23)	-	-	26,990	8,787	-	-	-	-
Net Best Estimate of Claims Provisions	R0250	**3,419**	**-**	**-**	**125,272**	**7,363**	**-**	**-**	**-**	**-**
Total Best estimate - gross	R0260	**(10,776)**	**-**	**-**	**130,279**	**(1,125)**	**-**	**-**	**-**	**-**
Total Best estimate - net	R0270	**(10,653)**	**-**	**-**	**108,536**	**(8,522)**	**-**	**-**	**-**	**-**
Risk margin	R0280	**350**	**-**	**-**	**13,094**	**1,813**	**-**	**-**	**-**	**-**
Amount of the transitional on Technical Provisions										
Technical Provisions calculated as a whole	R0290	-	-	-	-	-	-	-	-	-
Best estimate	R0300	-	-	-	-	-	-	-	-	-
Risk margin	R0310	-	-	-	-	-	-	-	-	-
Technical provisions - total										
Technical provisions - total	R0320	(10,426)	-	-	143,373	687	-	-	-	-
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	R0330	(123)	-	-	21,743	7,396	-	-	-	-
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	R0340	(10,303)	-	-	121,630	(6,709)	-	-	-	-

		Direct business and accepted proportional reinsurance			Accepted non-proportional reinsurance				Total Non-Life obligation
		Legal expenses insurance	Assistance	Miscellaneous financial loss	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance	
		C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180
Technical provisions calculated as a whole	R0010	-	-	-	-	-	-	-	-
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole	R0050	-	-	-	-	-	-	-	-
Technical provisions calculated as a sum of BE and RM									
Best estimate									
Premium provisions									
Gross	R0060	(96)	-	(7,330)	-	-	-	-	**(60,858)**
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140	-	-	(115)	-	(0)	-	-	**(6,854)**
Net Best Estimate of Premium Provisions	R0150	**(96)**	**-**	**(7,217)**	**-**	**0**	**-**	**-**	**(54,004)**
Claims provisions									
Gross	R0160	311	-	36	-	(365)	-	-	**171,789**
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240	-	-	(39)	-	(1)	-	-	**35,715**
Net Best Estimate of Claims Provisions	R0250	**311**	**-**	**75**	**-**	**(364)**	**-**	**-**	**136,075**
Total Best estimate - gross	R0260	**215**	**-**	**(7,296)**	**-**	**(366)**	**-**	**-**	**110,930**
Total Best estimate - net	R0270	**215**	**-**	**(7,142)**	**-**	**(364)**	**-**	**-**	**82,071**
Risk margin	R0280	**41**	**-**	**6**	**-**	**68**	**-**	**-**	**15,372**
Amount of the transitional on Technical Provisions									
Technical Provisions calculated as a whole	R0290	-	-	-	-	-	-	-	-
Best estimate	R0300	-	-	-	-	-	-	-	-
Risk margin	R0310	-	-	-	-	-	-	-	-
Technical provisions - total									
Technical provisions - total	R0320	256	-	(7,290)	-	(297)	-	-	**126,302**
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	R0330	-	-	(154)	-	(1)	-	-	**28,861**
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	R0340	256	-	(7,136)	-	(296)	-	-	**97,442**

S.19.01.21
Non-life Insurance Claims Information

Total Non-Life Business

Accident year / Underwriting year	Z0010	1

Gross Claims Paid (non-cumulative)
(absolute amount)

		Development year										
	Year	0	1	2	3	4	5	6	7	8	9	10 & +
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110
Prior	R0100											345
N-9	R0160	22,036	7,820	2,569	890	(191)	623	261	64	556	208	
N-8	R0170	24,432	10,721	2,649	154	1,166	2,667	720	322	692		
N-7	R0180	31,631	14,050	1,760	1,778	1,491	967	157	567			
N-6	R0190	38,257	16,892	3,612	1,382	1,523	862	1,762				
N-5	R0200	43,522	24,752	4,114	2,652	1,120	904					
N-4	R0210	52,792	33,244	6,757	1,610	2,621						
N-3	R0220	52,475	31,256	3,121	3,039							
N-2	R0230	76,867	47,021	6,079								
N-1	R0240	97,215	61,370									
N	R0250	99,675										

		In Current year	Sum of years (cumulative)
		C0170	C0180
	R0100	345	345
	R0160	208	34,838
	R0170	692	43,522
	R0180	567	52,400
	R0190	1,762	64,290
	R0200	904	77,063
	R0210	2,621	97,024
	R0220	3,039	89,891
	R0230	6,079	129,967
	R0240	61,370	158,585
	R0250	99,675	99,675
Total	R0260	**177,264**	**847,602**

Gross undiscounted Best Estimate Claims Provisions
(absolute amount)

		Development year										
	Year	0	1	2	3	4	5	6	7	8	9	10 & +
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300
Prior	R0100											462
N-9	R0160	-	-	4,562	4,793	3,429	2,681	1,866	1,746	940	570	
N-8	R0170	-	14,675	13,191	12,073	10,523	6,701	5,690	4,030	######		
N-7	R0180	29,807	11,457	7,952	5,222	3,909	2,419	1,867	1,264			
N-6	R0190	36,973	19,758	11,637	10,317	6,067	6,296	3,469				
N-5	R0200	39,851	15,889	12,741	10,970	8,639	4,244					
N-4	R0210	60,089	21,349	13,264	14,164	9,910						
N-3	R0220	55,582	23,048	22,251	14,855							
N-2	R0230	57,829	24,573	16,882								
N-1	R0240	74,702	31,657									
N	R0250	99,223										

		Year end (discounted data)
		C0360
	R0100	423
	R0160	534
	R0170	2,950
	R0180	1,183
	R0190	3,181
	R0200	3,999
	R0210	9,135
	R0220	13,593
	R0230	15,534
	R0240	29,443
	R0250	92,370
Total	R0260	**172,345**

S.23.01.01
Own funds

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation (EU) 2015/35						
Ordinary share capital (gross of own shares)	R0010	49,950	49,950		-	
Share premium account related to ordinary share capital	R0030	-	-		-	
Iinitial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040	-			-	
Subordinated mutual member accounts	R0050	-		-	-	-
Surplus funds	R0070	-				
Preference shares	R0090	-		-	-	-
Share premium account related to preference shares	R0110	-		-	-	-
Reconciliation reserve	R0130	119,026	119,157			
Subordinated liabilities	R0140	-		-	-	-
An amount equal to the value of net deferred tax assets	R0160	-				-
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180	10,000	10,000	-	-	-
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds						
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220	-				
Deductions						
Deductions for participations in financial and credit institutions	R0230	-	-	-	-	
Total basic own funds after deductions	R0290	**178,976**	**178,976**	**-**	**-**	
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300	-				
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310	-			-	
Unpaid and uncalled preference shares callable on demand	R0320	-			-	-
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330	-			-	-
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340	-			-	
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350	-			-	-
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360	-			-	
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370	-			-	-
Other ancillary own funds	R0390	-			-	-
Total ancillary own funds	R0400	**-**			**-**	**-**
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	179,896	179,896	-	-	-
Total available own funds to meet the MCR	R0510	179,896	179,896	-	-	
Total eligible own funds to meet the SCR	R0540	179,896	179,896	-	-	-
Total eligible own funds to meet the MCR	R0550	179,896	179,896	-	-	
SCR	R0580	**107,509**				
MCR	R0600	**36,011**				
Ratio of Eligible own funds to SCR	R0620	1.66				
Ratio of Eligible own funds to MCR	R0640	4.97				

		C0060	
Reconciliation reserve			
Excess of assets over liabilities	R0700	179,896	
Own shares (held directly and indirectly)	R0710	-	
Foreseeable dividends, distributions and charges	R0720	-	
Other basic own fund items	R0730	59,950	
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	-	
Reconciliation reserve	R0760	**119,026**	
Expected profits			
Expected profits included in future premiums (EPIFP) - Life business	R0770	-	
Expected profits included in future premiums (EPIFP) - Non- life business	R0780	54,004	
Total Expected profits included in future premiums (EPIFP)	R0790	54,004	

S.25.01.21
Solvency Capital Requirement - for undertakings on Standard Formula

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0100
Market risk	R0010	27,051		-
Counterparty default risk	R0020	12,900		
Life underwriting risk	R0030	7	-	-
Health underwriting risk	R0040	9,512	-	-
Non-life underwriting risk	R0050	94,148	-	-
Diversification	R0060	(30,901)		
Intangible asset risk	R0070	-		
Basic Solvency Capital Requirement	**R0100**	**112,716**		

Calculation of Solvency Capital Requirement		**C0100**
Operational risk	R0130	10,151
Loss-absorbing capacity of technical provisions	R0140	-
Loss-absorbing capacity of deferred taxes	R0150	(15,358)
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	-
Solvency capital requirement excluding capital add-on	**R0200**	**107,509**
Capital add-on already set	R0210	-
Solvency capital requirement	**R0220**	**107,509**
Other information on SCR		
Capital requirement for duration-based equity risk sub-module	R0400	-
Total amount of Notional Solvency Capital Requirement for remaining part	R0410	-
Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420	-
Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios	R0430	-
Diversification effects due to RFF nSCR aggregation for article 304	R0440	-

Approach to tax rate		**C0109**
Approach based on average tax rate	R0590	2

Calculation of loss absorbing capacity of deferred taxes		**C0130**
LAC DT	R0640	- 15,358
LAC DT justified by reversion of deferred tax liabilities	R0650	- 5,011
LAC DT justified by reference to probable future taxable economic profit	R0660	-
LAC DT justified by carry back, current year	R0670	- 10,347
LAC DT justified by carry back, future years	R0680	-
Maximum LAC DT	**R0690**	**- 15,358**

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

Linear formula component for non-life insurance and reinsurance obligations

		C0010
MCRNL Result	R0010	36,011

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
		C0020	C0030
Medical expense insurance and proportional reinsurance	R0020	-	17,740
Income protection insurance and proportional reinsurance	R0030	-	-
Workers' compensation insurance and proportional reinsurance	R0040	-	-
Motor vehicle liability insurance and proportional reinsurance	R0050	108,890	156,459
Other motor insurance and proportional reinsurance	R0060	-	129,049
Marine, aviation and transport insurance and proportional reinsurance	R0070	-	-
Fire and other damage to property insurance and proportional reinsurance	R0080	-	-
General liability insurance and proportional reinsurance	R0090	-	-
Credit and suretyship insurance and proportional reinsurance	R0100	-	-
Legal expenses insurance and proportional reinsurance	R0110	257	1,473
Assistance and proportional reinsurance	R0120	-	-
Miscellaneous financial loss insurance and proportional reinsurance	R0130	-	11,551
Non-proportional health reinsurance	R0140	-	-
Non-proportional casualty reinsurance	R0150	-	-
Non-proportional marine, aviation and transport reinsurance	R0160	-	0
Non-proportional property reinsurance	R0170	-	-

S.28.01.01
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	2

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
		C0050	C0060
Obligations with profit participation - guaranteed benefits	R0210	-	
Obligations with profit participation - future discretionary benefits	R0220	-	
Index-linked and unit-linked insurance obligations	R0230	-	
Other life (re)insurance and health (re)insurance obligations	R0240	73	
Total capital at risk for all life (re)insurance obligations	R0250		-

Overall MCR calculation

		C0070
Linear MCR	R0300	36,012
SCR	R0310	107,509
MCR cap	R0320	48,379
MCR floor	R0330	26,877
Combined MCR	R0340	36,012
Absolute floor of the MCR	R0350	4,000
		C0070
Minimum Capital Requirement	R0400	36,012

GREENVAL INSURANCE
BNP PARIBAS GROUP