

SOLVENCY AND FINANCIAL CONDITION REPORT 2024



GREENVAL INSURANCE
BNP PARIBAS GROUP

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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 Medium Low impact under PRISM for 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 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 31 December 2024 and 31 December 2023.

Financial Performance (EUR'000s)	Dec-24	Dec-23
Underwriting Performance	61,820	59,711
Investment Performance	6,497	8,995
Other Income and Expenses	(1,195)	(4,282)
Net Profit before Tax	67,122	64,424
Unrealised investment gains	3,867	6,334
Comprehensive Income	70,989	70,758
Corporation tax	(10,771)	(9,052)
Comprehensive Income after Tax	60,218	61,706

During 2024 the company:

- 1) Paid a dividend of €25m (2023: €49m) to its shareholder, Arval Service Lease SA
- 2) Maintained an A- credit rating from A.M. Best.

Under International Pillar Two tax reform, the Organization for Economic Co-Operation and Development (OECD) introduced a 15% global minimum tax (GMT) regime that has been adopted by Ireland and all countries in which the wider Group has significant operations, other than the U.S. Ireland enacted GMT legislation on 18 December 2023 which applies to fiscal years beginning on or after 31 December 2023.

The Company is a subsidiary of Arval, a leasing and fleet management company, which is part of a wider global financial services group headquartered in France (“the Group”). The Group has global turnover in excess of €750m and will fall within the scope of Pillar Two. The Company is an Irish incorporated and tax-resident subsidiary of the Group.

The Company is a member of a wider group which is a MNE group within the scope of Pillar Two. The Company has applied a top-up tax, which is added to corporation tax charged under domestic rules to reach the 15% rate. Further details on the application of top-up tax are disclosed in Note 10 to the 2024 Financial Statements.

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.

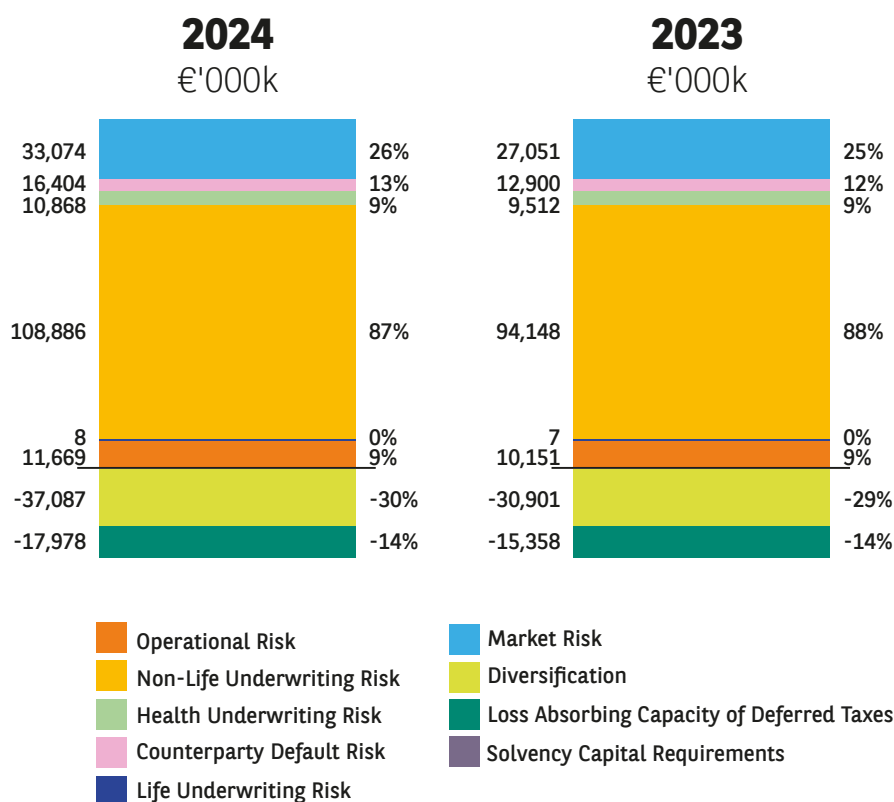
The Senior Executive Accountability Regime (SEAR) became effective in respect of executive PCF roles within in-scope firms from 1st of July 2024.



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-24			31-Dec-23		
	Solvency II Value	Statutory Accounts Value	Difference	Solvency II Value	Statutory Accounts Value	Difference
Total Assets	381,327	398,683	(17,356)	320,709	335,759	(15,050)
Liabilities	Solvency II Value	Statutory Accounts Value	Difference	Solvency II Value	Statutory Accounts Value	Difference
Technical Provisions	158,850	210,677	(51,827)	126,868	186,613	(59,745)
Other liabilities	16,362	13,900	2,462	14,865	10,259	4,605
Total Liabilities	175,212	224,577	(49,365)	141,733	196,872	(55,139)
Excess of Assets Over Liabilities	206,115	174,106	32,009	178,976	138,887	40,089

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 31 December 2024 and 31 December 2023 which is assessed using the Standard Formula.

Solvency Position (EUR'000s)	Dec-24	Dec-23
Total Tier 1 Unrestricted Own Funds	183,115	178,976
Solvency Capital Requirement ("SCR")	125,844	107,509
SCR Coverage	146%	166%
Minimum Capital Requirement ("MCR")	45,276	36,012
MCR Coverage	404%	497%

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 31 December 2024 and 31 December 2023.

*The above SCR includes the Company's foreseeable dividend payment of €23m. The SCR excluding the foreseeable dividend would be 164%.

The Company's Solvency Capital Requirement increased by €18m (c.17%) during the reporting period ended 31 December 2024 compared to 31 December 2023 with the largest variations deriving from:

Non-life underwriting risk	14,738	16%
Market risk	6,023	22%
Diversification	(6,186)	20%

The above table shows the percentage increase in 2024 compared to 2023.

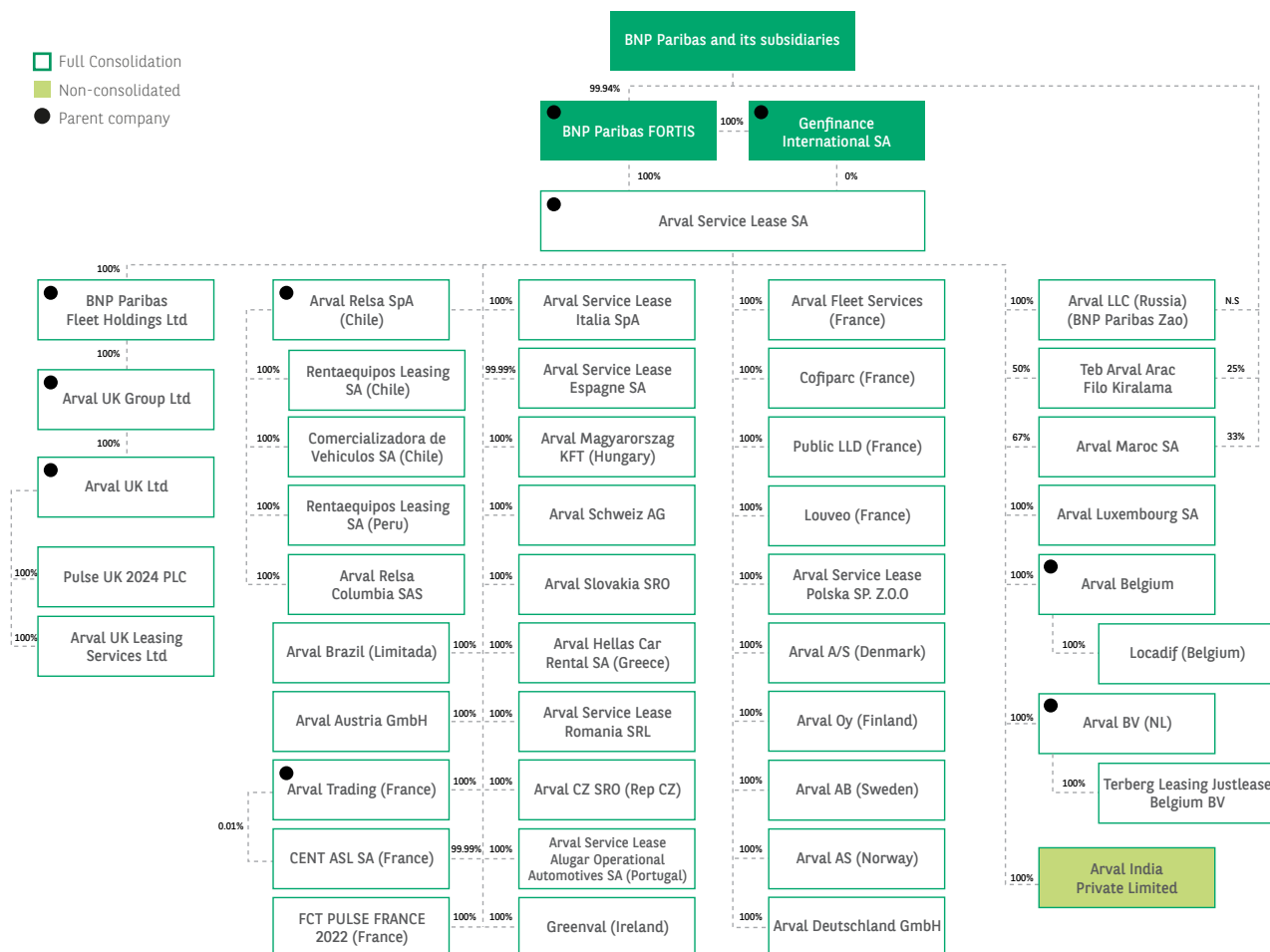
Report Approval

This report was reviewed by the Company's Audit Committee on 27th March 2025. It was subsequently reviewed and approved by the Board of Directors on 4th April 2025.



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 Medium Low impact under PRISM for 2024.

A1.3. External Auditor

The Company's external auditors at 31 December 2024 are Deloitte Ireland LLP, 29 Earlsfort Terrace, Dublin 2, D02 AY28.

A1.4. Qualifying Holdings

As at 31 December 2024 the Company is a wholly owned subsidiary of Arval Service 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 31 December 2024 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..

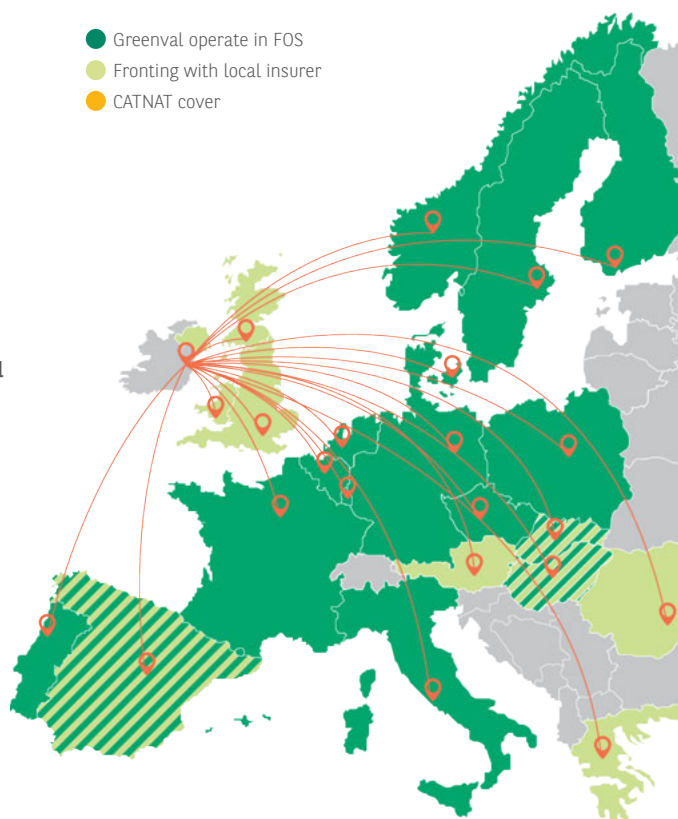
The following motor insurance products by lines of business are underwritten by the Company:

- **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 31 December 2024, 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 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.

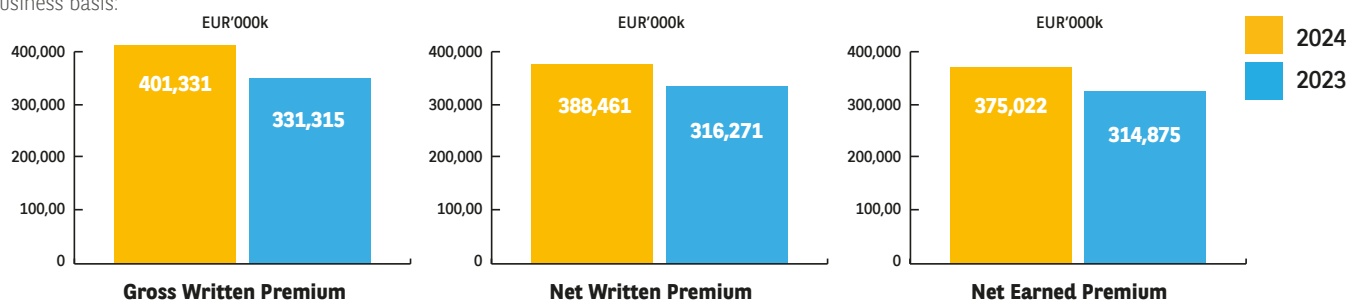
A2. Underwriting Performance

The following table presents the underwriting performance by material lines of business for the year ended 31 December 2024 and 31 December 2023

31-Dec-24	Driver Cover	Third Party Liability	Motor Own Damage & CATNAT	Other lines of business*	Total
	€'000	€'000	€'000	€'000	€'000
Gross Written Premium - Direct	21,404	155,890	136,277	14,110	327,681
Gross Written Premium - Reinsurance accepted	-	45,468	28,181	-	73,649
Reinsurers' share	-	(8,100)	(4,769)	-	(12,869)
Net Written Premium	21,404	193,258	159,689	14,110	388,461
Gross Earned Premium - Direct	20,034	154,260	131,978	14,496	320,768
Gross Earned Premium - Reinsurance accepted	-	39,583	28,650	-	68,233
Reinsurers' share	-	(7,662)	(6,316)	-	(13,978)
Net Earned Premium	20,034	186,181	154,312	14,496	375,023
Gross Claims Incurred - Direct	(1,889)	(125,033)	(103,468)	(68)	(230,508)
Gross Claims Incurred - Reinsurance accepted	-	(23,692)	(22,928)	666	(45,954)
Reinsurers' share	-	9,529	2,818	(341)	12,006
Net Claims Incurred	(1,889)	(139,246)	(123,578)	257	(264,456)
Expenses incurred	(3,329)	(34,605)	(16,039)	(2,194)	(56,167)
Underwriting Result	14,816	12,326	14,695	12,563	54,400

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	124,646	110,676	13,024	266,086
Gross Written Premium - Reinsurance accepted	-	41,622	23,606	-	65,228
Reinsurers' share	-	(9,810)	(5,233)	-	(15,043)
Net Written Premium	17,740	156,458	129,049	13,024	316,271
Gross Earned Premium - Direct	18,098	131,513	112,510	13,022	275,143
Gross Earned Premium - Reinsurance accepted	-	33,300	21,986	-	55,286
Reinsurers' share	-	(10,304)	(5,250)	-	(15,554)
Net Earned Premium	18,098	154,509	129,246	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)	(96,658)	(108,574)	(1,685)	(214,148)
Expenses incurred	(855)	(27,546)	(16,064)	(1,985)	(46,450)
Underwriting Result	10,014	30,305	4,608	9,352	54,279

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) Insurance Revenue, Net written premium & Net earned premium

- Insurance revenue (IFRS 17) has increased in the year by 18% from €330m in 2023 to €389m in 2024.
- Net written premiums have increased in the year by 23% from €316m in 2023 to €388m in 2024.
- Net earned premiums have increased in the year by 19% from €315m in 2023 to €375m in 2024.
- These increases are primarily due to increases in fleet volume levels in various countries particularly in Poland and Netherlands.

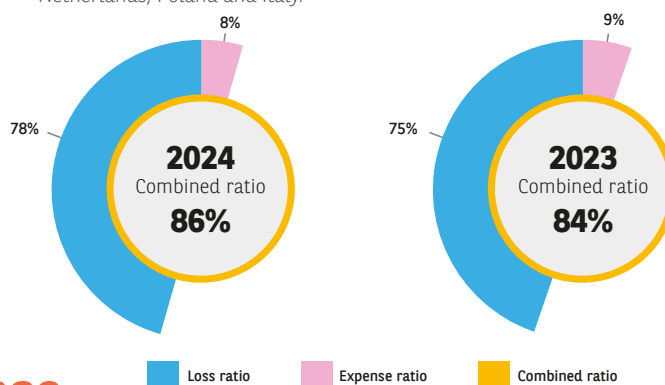
2) Combined operating ratio

- Combined ratio comprising claims and expense ratios for 2024 & 2023 are as follows:

Combined operating ratio ("COR")

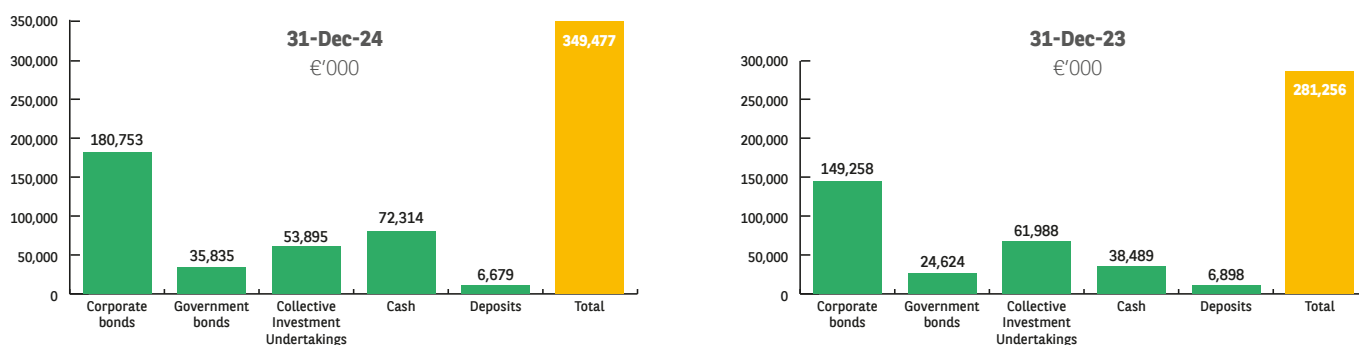
The COR increased from 84% to 86% as a result of a greater negative movement on the insurance liabilities, reflecting a higher loss on finance income/expenses as a result of a lower positive discounting impact in 2024, which increased by €5.6m to (€6.7m) in 2024. This was partially offset by a positive movement on the discounting of the reinsurance liabilities by €1.4m.

The most significant concentration of underwriting risk in reference to the Company's gross technical provisions exists in France, Belgium, Netherlands, Poland and Italy.



A3. Investment Performance

At 31 December 2024 and 31 December 2023 the Company's investment portfolio comprised of the following. There were no investments in securitisations.

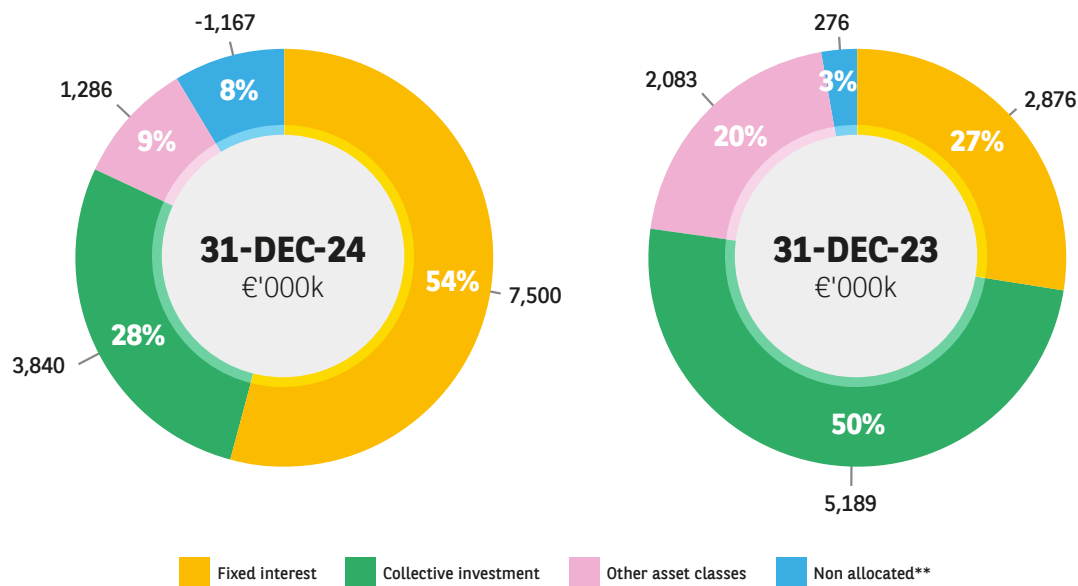


The table below summarises the investment performance for the reporting period.

	31-Dec-24					31-Dec-23				
Asset Category	Income & Expenses	Realised Gains & Losses	Unrealised Gains & Losses (P&L)	Total through Profit & Loss	Unrealised Gains & Losses (OCI)	Income & Expenses	Realised Gains & Losses	Unrealised Gains & Losses (P&L)	Total through Profit & Loss	Unrealised Gains & Losses (OCI)
	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000
Fixed Interest	2,963	4,537	-	7,500	3,867	3,161	(285)	-	2,876	6,563
Collective Investment Funds	1,949	713	1,178	3,840	-	1,542	251	3,396	5,189	-
Other asset classes	1,285	-	-	1,286	-	1,999	83	-	2,083	(229)
Non allocated*	(1,167)	-	-	(1,167)	-	276	-	-	276	-
Total	5,030	5,250	1,178	11,458	3,867	6,979	49	3,396	10,424	6,334

*Comprise foreign exchange and other Investment Management expenses

Profit & Loss



OCI



Investment performance for the year, recognised in the P&L has increased to €11.5m in 2024 compared to €10.4m in 2023. Realised gains on the disposal of bonds is the main contributor to the increase in investment income. Overall interest earned has dropped slightly by €0.9m reflecting the lower interest rate environment in 2024 compared to 2023. Interest income on funds has increased by €0.4m as a result of an increase in the NAV's compared to 2023 coupled with an increase in income yielding funds within the portfolio during 2024. The mark-to-market (MTM) gains on funds recognised within the P&L has decreased to €1.2m in 2024 compared to €3.4m in 2023. Foreign exchange gain/loss of +€0.7m in 2023 moving to a loss in 2024 of -€0.6m.

A4. Performance of other activities

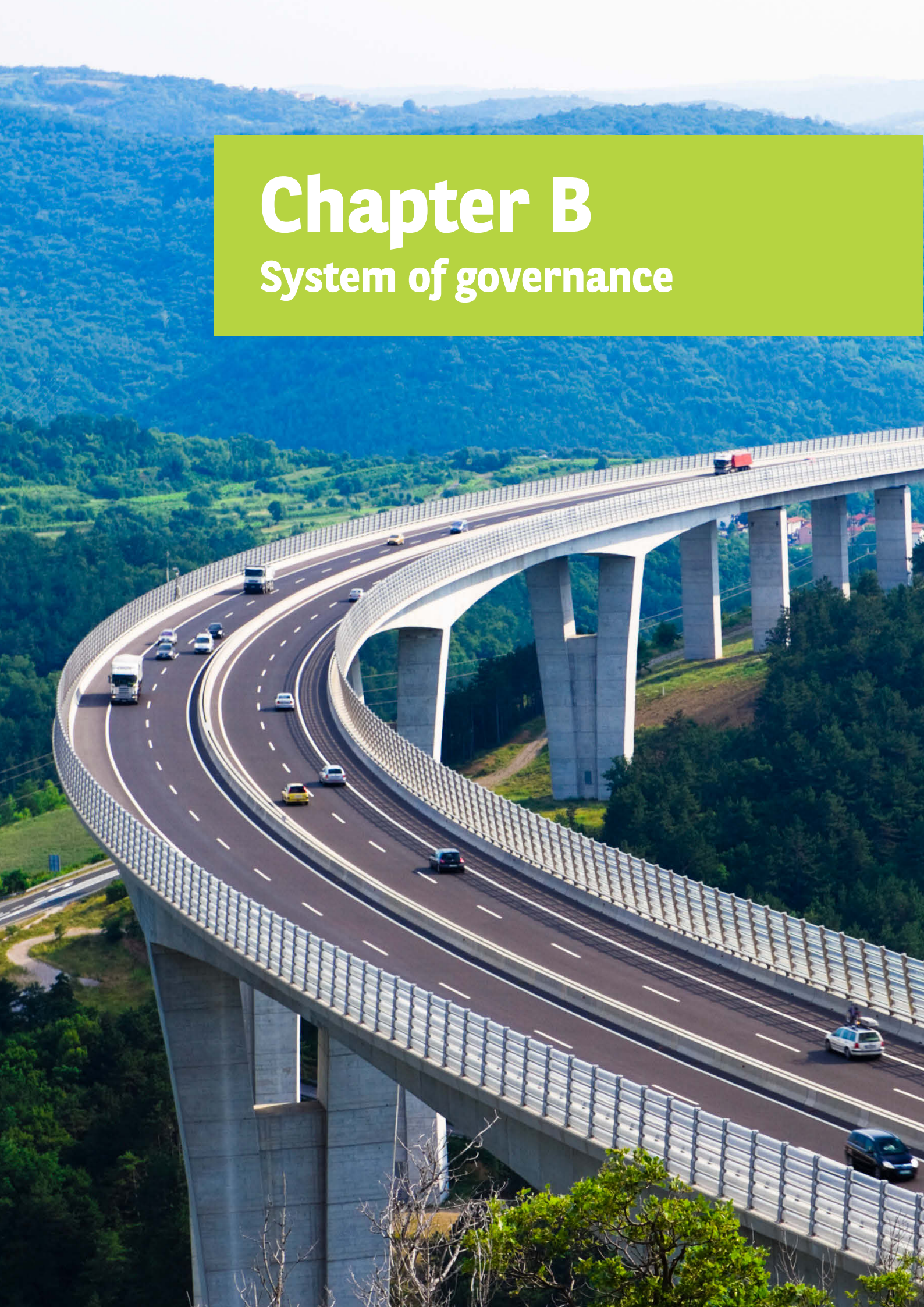
The Other Income category has remained stable on the prior year and largely reflects income from services provided to group companies.

A5. Any other information

Refer to Section B.1.4. Material Transactions for further information on dividend distributions for 2023 and 2024.

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 & Chairman	Investment Committee Member	Board: 9 years and 5 months Investment Committee: 8 years and 9 months
Paul Duffy Resigned 31st December 2024	Independent Non-Executive Director	Audit Committee Member & Chairperson, Risk Committee Member, Investment Committee Member	Board: 8 years and 11 months Risk Committee: 6 years and 7 months Audit Committee: 7 years and 1 month Investment Committee: 8 years and 1 month
Joan Collins	Independent Non-Executive Director	Audit Committee Member Risk Committee Member & Chairperson	Board: 2 year and 3 months Risk Committee: 2 year and 1 month Audit Committee: 1 year and 8 months
Remi Esclattier	Non-Executive Director	Risk Committee Member Investment Committee Member & Chairperson	Board: 6 years 7 months Risk Committee: 6 years and 7 months Investment Committee: 4 years and 6 months
Olivier Mantoulan	Executive Director & Managing Director	N/A	Board: 8 years and 10 months
John Sheridan	Executive Director & Chief Financial & Operating Officer	Investment Committee Member	Board: 4 years and 8 months Investment Committee: 4 years and 6 months
Bart Beckers	Non-Executive Director	Risk Committee Member	Board: 3 years and 2 months Risk Committee: 3 years and 2 months
Stephane De Marnhac	Non-Executive Director	Audit Committee Member	Board: 3 years and 2 months Audit Committee: 3 years and 2 months
Ian Britchfield	Independent Non-Executive Director	Audit Committee Member & Chairperson Risk Committee Member	Board: 0 years and 3 months Risk Committee: 0 years and 2 months Audit Committee: 0 years and 2 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 amounts, types and distribution of both internal capital and own funds adequate to cover the risks of the Company.
- Setting and overseeing the strategy for the on-going management of material risks including capital, solvency & liquidity risks.
- A robust and transparent organisational structure with effective communication and reporting channels.
- An adequate and effective internal control framework, that includes well-functioning risk management, compliance and internal audit functions as well as an appropriate financial reporting and accounting framework.

- Directing management in the oversight of the Company's compliance with legal and regulatory requirements; and fulfilling its responsibility to oversee Greenval's accounting and financial reporting processes and audits of Greenval's financial statements.
- Reviewing the financial reports and other financial information provided to the Company from auditors.

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:

- To inform directors of the entity of the outcome of the statutory audit and explain how the statutory audit contributed to the integrity of financial reporting and what the role of the audit committee was in that process,
- Monitor the financial reporting process and submit recommendations or proposals to the directors of the entity to ensure its integrity,
- Monitor the effectiveness of the entity's internal quality control and risk management systems and, where applicable, its internal audit, regarding the financial reporting of the entity, without breaching its independence,
- Monitor the statutory audit of the annual and financial statements, in particular, its performance, taking into account any findings and conclusions by the Supervisory Authority pursuant to Article 26(6) of Regulation (EU) No 537/2014,
- To review and monitor the independence of the statutory auditors or the audit firms in accordance with Regulations 93 to 98 and Article 6 of Regulation (EU) No 537/2014, and, in particular, the appropriateness of the provision of non-audit services to the audited entity in accordance with Article 5 of that Regulation, and
- To be responsible for the procedure for the selection of a statutory auditor or audit firm and recommend the statutory auditor or audit firm to be appointed in accordance with Article 16 of Regulation (EU) No 537/2014 except when Article 16(8) of that Regulation is applied.

Risk Committee

The main roles and responsibilities of the Risk Committee are:

- Recommending an appropriate and effective risk strategy, framework and resource plan which supports the Company's business strategy to the Board for approval.
- Reviewing and recommending the risk appetite metrics for each of the major risk classes to the Board for approval.
- Reviewing and challenging the Company's overall risk profile, capital and funding position of the business.
- Monitoring and challenging actual risk exposure and ensuring appropriate actions are taken to manage exposures within the risk appetite parameters set by the Board. This monitoring includes a regular review of operational risk matters.

- Perform deep dive risk reviews into key business/risk areas as appropriate.
- Overseeing and challenging the work performed by the Company in relation to Solvency II and Risk Based Capital assessments, including the underlying inputs such as stress testing and scenario analysis.
- Reviewing risk implications of proposed business developments within the non-life insurance businesses. This includes in particular the consideration of any material outsourcing proposals, new insurance concepts and changes to the business plan, the use of new insurance products and the requirements of the Company's Product Oversight & Governance Policy.
- Review all material reinsurance arrangements, both internal and external on an annual basis.
- Overseeing the ongoing development, implementation and operation of the risk strategy, framework, and resource plan.
- Ensuring the risk management function is sufficiently independent and is free from management and other restrictions.
- Overseeing the work of the Company Risk Function and the Chief Risk Officer.
- Oversee and advise the Board on the current risk exposures of the company and future risk strategy, having regard to the strategic objectives, culture and values.

Investment Committee

The main roles and responsibilities of the Investment Committee are:

- Recommend an appropriate investment policy to the Board for approval,
- Ensure compliance with the approved investment policy,
- Assist the Board in appointing an investment advisor to the Company,
- Review the performance of the investment advisor to the Company,
- Assist the Board in appointing a custodian to safeguard the company's assets,
- Monitor external developments in relation to interest and exchange rates as they relate to the Company,
- Ensure that the investment risks of the Company are appropriately monitored and that appropriate resources are allocated to facilitate such monitoring,
- Minimise the risk of loss to the Company due to counterparty default,
- Maximise the benefits to the shareholder of surplus cash in the Company,
- Ensure the existence of a sound reporting framework in relation to investments under management.
- Discuss policies regarding risk assessment and risk management.
- Following each meeting, report on the proceedings of the Committee to the full Board with such recommendations as the Committee may deem appropriate;

B1.1.3. Management Committees

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:

Organisational Structure and Governance

- Working with the Board to establish, implement and maintain decision-making processes and an organisational structure which clearly documents reporting lines and allocates responsibilities.
- Establishing, implementing and maintaining effective internal reporting and communication of information to the Board of Greenval, sub-committees of the Board, and across the Company.

Strategy and Culture

- Implementing and monitoring the business objectives and strategy of the Company as approved by the Board.
- Implementing, monitoring and regularly reviewing the culture and values of the Company.
- Providing regular updates to the Board and the relevant sub-committees of the Board on the implementation of the Company's strategy, business objectives and culture.

Financial Performance

- Managing and regularly reviewing the financial performance of the Company, including the integrity of management information and financial reporting systems.
- Reviewing the work performed by the Company in relation to Solvency II and Risk Based Capital assessments, including the underlying inputs such as stress testing and scenario analysis.
- Establishing, implementing and maintaining accounting policies and procedures which reflect a true and fair view of the financial position of the Company, and can be provided to regulatory authorities in a timely manner on request.
- Establishing and maintaining effective systems of financial control for the Company to ensure conformity with all statutory and regulatory requirements, as well as relevant internal Group policies.

Operational Performance

- Reviewing and monitoring the Company's business performance delivery against plans and other new business opportunities arising from changing markets and report to the Board on such progress.
- Managing and monitoring the operational performance of the Company against objectives and key performance indicators approved by the Board, including overseeing the performance of each business function.

Risk

- Implementing the Board approved Risk Management Framework to ensure the proper identification and management of risk.
- Establishing, implementing and maintaining reporting to enable the Board and sub-committees of the Board to have appropriate oversight of risk matters.
- Reviewing breaches of the Company's Risk Appetite Statement (RAS), including the assessment of the materiality of any breaches that occur and ensuring management take corrective action.
- Reviewing the risk implications of proposed business developments within the non-life insurance businesses.
- Ensuring that Environmental, Social and Governance risks are considered when developing and implementing the strategy of the Company.

Compliance

- Monitoring compliance with relevant policies, legislation and regulations.

Internal Control

- Establishing, implementing and maintaining adequate internal control mechanisms to ensure compliance with regulation and Company procedures.
- Monitoring and evaluating the adequacy and effectiveness of the internal control environments and taking appropriate measures to address any identified deficiencies.
- Reviewing and monitoring findings and recommendations reported by the Internal Audit Function of the Company.

Human Resources

- Ensuring that a performance management process is in place in line with the Company's Performance Management Policy.
- Ensuring that the Company's staff have access to regular training to maintain and enhance their professional capabilities and to keep themselves updated on industry and regulatory developments relevant to their areas of responsibility.

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 Managing Director ("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 & Underwriting Committee

The role of the Pricing & Underwriting Committee ("PUC") is to support Greenval Management, Board, Risk Committee and any additional Committees in monitoring and providing oversight of pricing and underwriting risks within Greenval. It will ensure appropriate underwriting practices are in place and that pricing activities are consistent with the Company's Pricing & Underwriting Policy, Risk Acceptance Guidelines, applicable insurance accounting policies, actuarial standards of practice, regulatory requirements and other related policies. The PUC is chaired by the Managing Director ("MD") and meets quarterly.

The main responsibilities of PUC are:

- Monitoring the Projected Combined Operating ratio for each insurance programme, including the expected premium rate and claims experience over the projection period;
- Approving the Risk Acceptance Guidelines and any changes to those Guidelines;
- Approving the pricing proposals for new business projects;
- Approve any changes to standard rate pricing for existing insurance programmes or clients (if fleet size exceeds the authority limit of the Head of Underwriting);
- Approving risks presented by the Head of Underwriting for approval;

- Monitor performance of the Company's reinsurance programme, reinsurers and reinsurer broker;
- Review and approve reinsurance renewal strategy;
- Annual review and approval of the Reinsurance Policy;
- Annual review and approval of the Pricing & Underwriting Policy;
- Monitor product review, remediation and distribution (Product Oversight and Governance) activities;
- Review results of internal and external audits as well as results from external consulting engagements on pricing, underwriting or product oversight and governance topics;
- Annual review and approval of the Product Oversight and Governance policy;
- Ensure the Committee's Terms of Reference are reviewed annually.

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:

- monitoring and oversight of the Company's compliance framework, in order to ensure adherence with applicable laws, regulations.
- providing direction and management support for the development of the Company's compliance framework, so that it aligns with the requirements of its insurance authorisation from the Central Bank of Ireland.
- ensuring the Company's compliance framework remains appropriate and adequate with regard to coverage and ability to ensure adherence to standards.
- ensuring that regulatory change projects are supported by the commitment of financial, technical and human resources, to ensure compliance with applicable legislation and regulatory standards.

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,**
- **Oversee and approve the arrangements' criticality assessment, as required by the Company's Outsourcing Policy,**
- **Oversee and approve the providers' classification as outsourcing or purchasing, resulting from Outsourcing Managers' evaluation,**
- **Oversee all existing outsourcing relationships to ensure the service level agreement/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 relating to outsourcing,**
- **To consider and if thought suitable, approve the preferred bidder in case of a new outsourcing provider proposal,**
- **To consider, and if thought suitable, approve the proposed sub-outsourcing, by an outsourced service provider, of all or a material part of the function, activity, or legal obligation that the Company has outsourced to its outsourced service provider,**
- **To monitor the Outsourcing Providers' performance and audit results,**
- **To consider, and if thought suitable, approve the Outsourcing Register.**

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 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 the Company, Group and regulators' with respect to business continuity, operational resilience and crisis management.**
- **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

B1.1.4. Key Functions

Risk Management Function

Greenval has appointed a Chief Risk Officer (CRO) who is responsible for the Risk Management Function. .

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 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.

During 2024 Paul Duffy retired as Independent Non-Executive Director on the 31st of December 2024 and Ian Britchfield was appointed as Independent Non-Executive Director on the 6th of September 2024. Carol Kierans was appointed as a Non-Executive Director on the 18th of March 2025.

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:

- 1) A dividend of €25m (2023: €49m) was paid to its shareholder, Arval Service Lease SA.

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:

- 1) insurance and financial markets
- 2) business strategy and business model
- 3) system of governance
- 4) financial and actuarial analysis
- 5) 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. Enhancements to the Fitness & Probity (F&P) Regime went live from 29th December 2023 including clarifying the company's obligations to proactively certify that individuals carrying out certain specified functions are fit and proper.

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.
- 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.

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

Risk Management Function

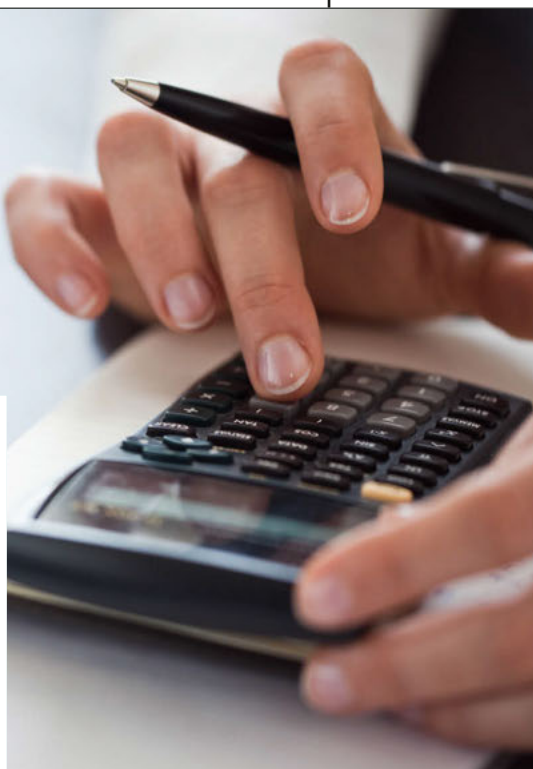
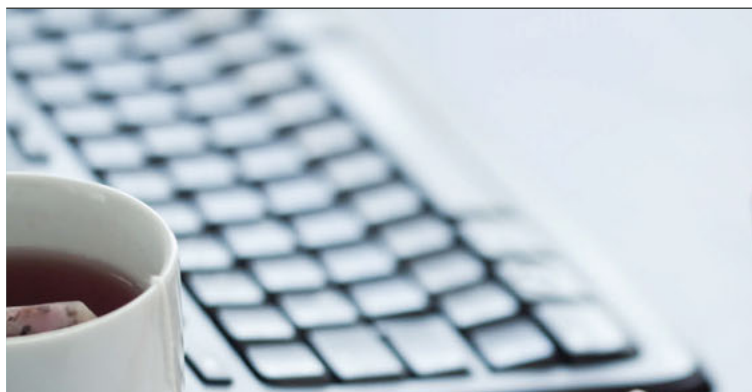
Greenval has appointed a Chief Risk Officer who is responsible for the Risk Management Function as set out in section B.1.1.4 of this report.

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 Company. 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 regulators

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. Greenval are currently in the process of outsourcing the Internal Audit Function to an external party to the BNP Paribas Group.

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, 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	France
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 a number of 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 31 December 2024 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 frontier 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 23% from €316m in 2023 to €388m in 2024. This increase is primarily due to increased fleet numbers in existing countries and the full year effect of acquisitions within the Arval group in the preceding year. 84% (2023: 80%) of GWP is attributable to business written on a direct basis while 16% (2023: 20%) represents business written via fronting.

Underwriting Risk Concentrations

Greenval writes fleet motor insurance to the Arval Group and their clients in a number of European Union territories. The most significant concentration of underwriting risk in reference to the Company's gross technical provisions exists in France, Belgium, Netherlands, Poland and Italy.

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 & Underwriting Committee and Reserving Committee which are Management Committees tasked with overseeing pricing, underwriting and reserving activities. These committees meet on a quarterly basis.**

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 company's ability to meet its SCR, with the exception of the reverse stress tests applied in the 2024 ORSA 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 and collective investment undertakings
- 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.

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

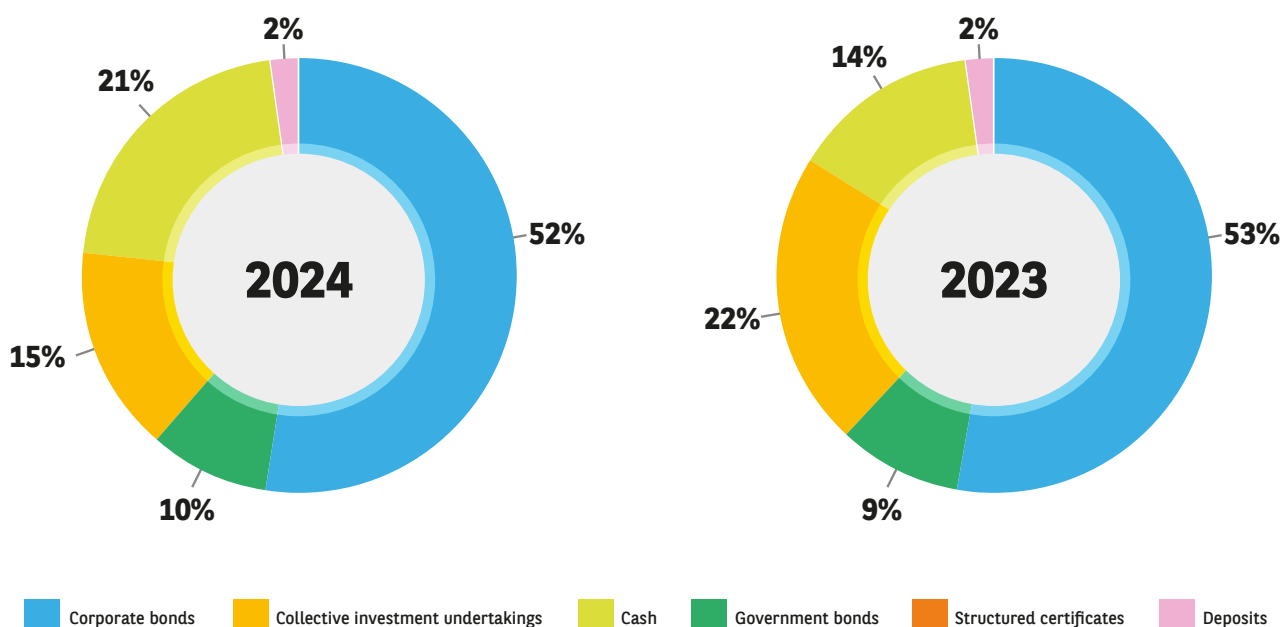
v. Currency risk

- 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").

Market Risk Concentrations

The following chart provides information regarding the concentration of investments, based on market values at 31 December 2024 and 31 December 2023. 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.

In addition, the risk appetite statement of the business sets out several key risk indicators that are used to monitor and assess the risks pertaining to our investment portfolio.

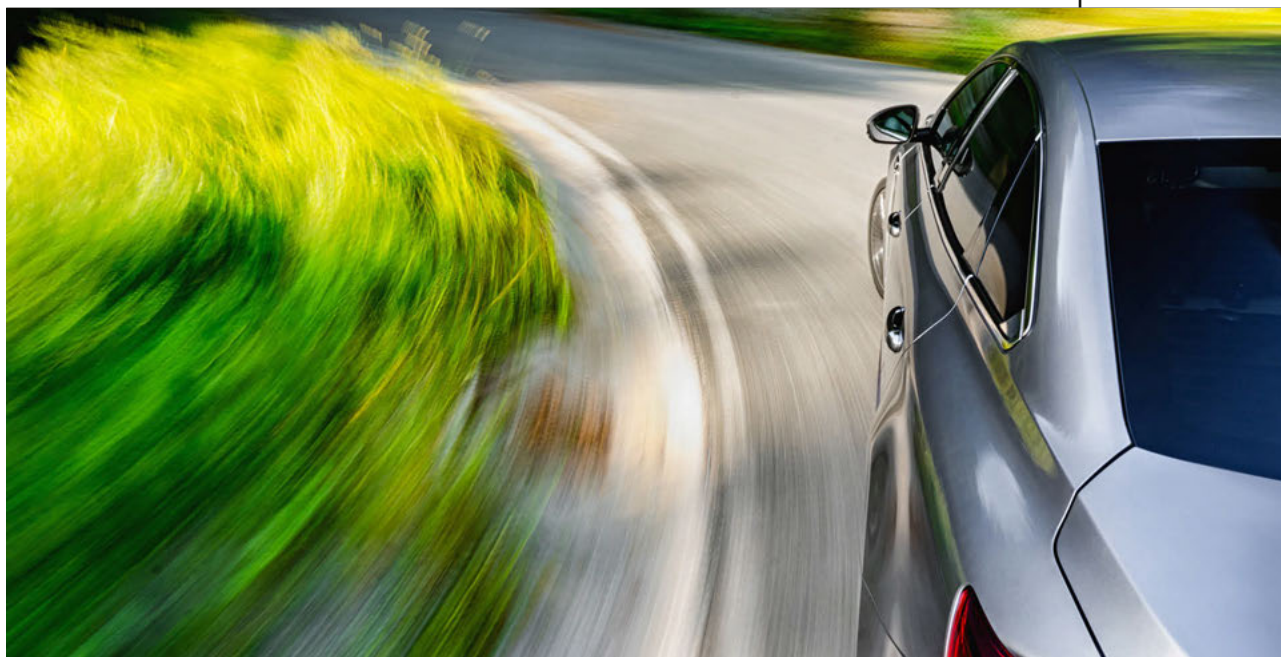


The table below presents the Company's material foreign exchange risk concentrations at 31 December 2024 and 31 December 2023 comparison in Polish Zloty ("PLN"), British Pound ("GBP"), and Czech Koruna ("CZK") which are the most material exposures to the Company.

Category	31-Dec-24		31-Dec-23	
	Assets	Liabilities	Assets	Liabilities
	€'000	€'000	€'000	€'000
PLN	8,298	(3,608)	10,575	(8,494)
GBP	2,447	(1,794)	5,315	(4,807)
CZK	7,128	(7,138)	5,676	(3,732)

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 2024	Shareholders' equity 2024	Profit before tax 2023	Shareholders' equity 2023
	€'000	€'000	€'000	€'000
1% increase in interest rates	-	(12,291)	-	(8,201)



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
- All equity investments must be approved by the IAU committee.

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 investment manager's performance is managed through the companies outsourcing oversight arrangement.

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 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 in 2024.

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 31 December 2024.

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 31 December 2024 and 31 December 2023.

31st December 2024 EUR'000s	Credit Rating						Total
	AAA	AA	A	BBB	BB	Not Rated	
Available-for-sale financial assets	7,579	37,439	61,202	110,367	-	53,896	270,483
Deposits with credit institutions	-	-	6,679	-	-	-	6,679
Cash and cash equivalents	-	-	72,314	-	-	-	72,314
Reinsurance contract assets	-	3,820	39,897	-	-	-	43,717
Total	7,579	41,259	180,092	110,367	-	53,896	393,193

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	-	61,989	235,872
Deposits with credit institutions	-	-	6,898	-	-	-	6,898
Cash and cash equivalents	-	-	38,489	-	-	-	38,489
Reinsurance contract assets	-	7,428	33,117	-	-	-	40,545
Total	11,280	33,762	132,084	82,689	-	61,989	321,804

During the year, there were cash transfers of €20m into the Company's asset management portfolio, the majority of which was invested into the company's bond portfolio.

The Company's holdings in cash and deposits increased from €45m to €79m during the period with in excess of 92% of cash and deposit holdings held with BNP entities.

The Company appointed two new reinsurers to its reinsurance panel for 2024.

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, this includes a minimum of A- rating.

In addition at 31 December 2024:

- in excess of 92% (2023: 95%) 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 engage 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 31 December 2024 and 31 December 2023.

Assets 31st December 2024 (EUR'000s)	Total	Within 1 Year	1-5 Years	5-10 Years	>10 Years	No Maturity
Financial assets	270,483	15,850	61,911	105,404	33,422	53,896
Deposits with credit	6,679	6,679	-	-	-	-
Cash and cash equivalents	72,314	72,314	-	-	-	-
Insurance contract assets	2,154	2,154	-	-	-	-
Reinsurance contract assets	43,717	43,717	-	-	-	-
Other assets	462	462	-	-	-	-
Total	395,809	141,176	61,911	105,404	33,422	53,896

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	6,898	6,898	-	-	-	-
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

* Financial assets comprise Corporate bonds, Government bonds and Collective Investment Undertakings.

Liabilities 31st December 2024 (EUR'000s)	Total	Within 1 Year	1-5 Years	5-10 Years	>10 Years
Insurance contract liabilities	210,677	84,367	48,414	42,950	34,946
Reinsurance contract liabilities	1,539	246	555	627	111
Other liabilities	8,166	8,166	-	-	-
Current tax liabilities	2,175	2,175	-	-	-
Lease liabilities	2,020	227	905	888	-
Total	224,577	95,181	49,874	44,465	35,057

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	92,762	56,921	34,896	11,509

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 92% (2023: 95%) 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.

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

- 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.

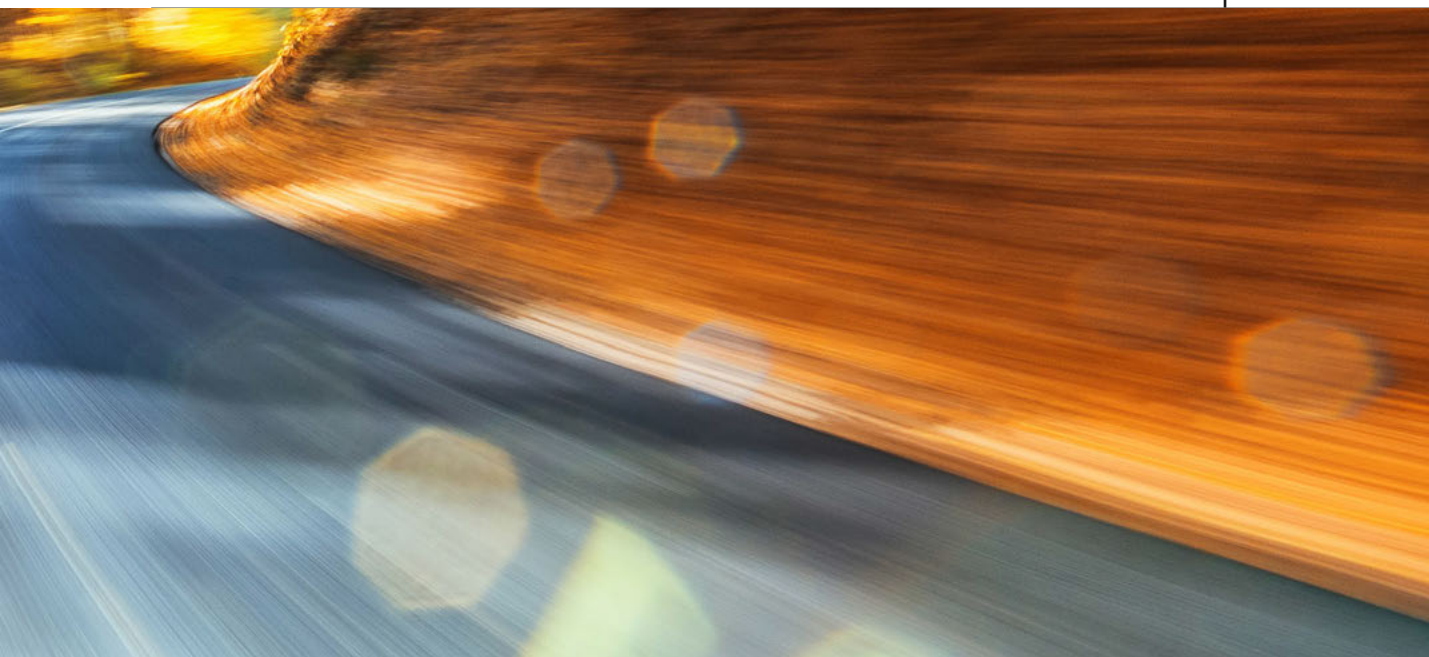
There were no material changes to the strategies, policies and processes for managing this risk during the reporting period.

C4.4. Expected Profit included in Future Premiums

At 31 December 2024 the expected profit included in future premiums is €60.7m (2023: €54m).

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, the sensitivity of the solvency ratio to a deterioration in liquidity position was assessed in the ORSA process. The results of the ORSA suggest that the company's solvency position can withstand a short term sudden market disruption leading to a liquidity challenge.



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 2019-2024 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.

Geopolitical Risk

The heightened geopolitical risks and macroeconomic uncertainties that have emerged in recent times need to be closely monitored and carefully managed by Greenval through its Risk Management Framework. It is important that Greenval has a geopolitical/macroeconomic risk assessment capability to understand and develop strategies to mitigate any potential impacts/consequences that could impact the business. Such risks can be those directly related to the provision of motor insurance (claims inflation/reinsurance hardening), those risks related to any uncertainty/volatility in the equity/bond markets, or macro economic risks impacting Arval that indirectly impact our business (growth/renewals).

Claims Frequency & Inflation

Volatility in claims frequency represents a significant area of uncertainty. Frequency has begun 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 monitors this situation closely and a sensitivity analysis of the impact of increases and decreases in claims frequency is summarised below.

Impact Net Claims	2024	2023
	€'000	€'000
-10%	(28,036)	(21,722)
-5%	(14,018)	(10,861)
+5%	14,018	10,861
+10%	28,036	21,722

The Company observed an increase in claims costs in 2024 and 2023 largely reflecting inflationary cost increases, especially on MOD claims.

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 last recovery plan approved on 19th March 2024.

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.

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 31 December 2024 and 31 December 2023 and information on material classes of assets is provided thereunder.

Balance sheet	31-Dec-24			31-Dec-23		
Assets	Solvency II Value	Statutory Accounts Value	Difference	Solvency II Value	Statutory Accounts Value	Difference
Deferred tax assets	135	135	-	619	619	-
Property, plant & equipment held for own use	1,847	2,739	(892)	2,248	2,952	(704)
Government Bonds	35,835	35,835	-	24,624	24,624	-
Corporate Bonds	180,753	180,753	-	149,258	149,258	-
Structured notes	-	-	-	-	-	-
Collective Investments Undertakings	53,895	53,895	-	61,988	61,989	(1)
Deposits other than cash equivalents	6,679	6,679	-	6,898	6,898	-
Reinsurance recoverables	26,960	43,717	(16,757)	29,309	40,545	(11,236)
Deposits to cedants	2,447	-	2,447	4,925	-	4,925
Insurance and intermediaries receivables	-	2,154	(2,154)	-	8,034	(8,034)
Reinsurance receivables	-	-	-	-	-	-
Receivables (trade, not insurance)	-	-	-	-	-	-
Cash and cash equivalents	72,314	72,314	-	38,489	38,489	-
Any other assets, not elsewhere shown	462	462	-	2,350	2,350	-
Total assets	381,327	398,683	(17,356)	320,708	335,758	(15,049)

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

- **Corporate Bonds with an increase of €31m,**
- **Cash and cash equivalents with an increase of €34m,**
- **Government Bonds with an increase of €11m.**

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 €27m (2023: €29.3m) on a Solvency II basis compared to the IFRS 17 value of €43.7m (2023: €40.5m). This difference of €16.8m (2023: €11.2m) 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 2024 the Company provided collateral via a loss deposit fund of €2.4m (2023: €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 €2m (2023: €8m) 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:
 - 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 31 December 2024 and 31 December 2023, 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 €0.5m at 31 December 2024 and €2.4m at 31 December 2023.
 - 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 present a summary of the Solvency II valuation of non-life and life technical provisions compared to the IFRS financial statements at 31 December 2024 and 31 December 2023.

Solvency II Total Technical Provisions

Component	Gross Technical Provisions	Reinsurance Recoverables	Net Technical Provisions
Undiscounted IFRS 17 LIC	304,595	47,587	257,008
Remove IFRS 17 Expenses	-	-	-
Remove IFRS 17 ENID	(12,500)	(6,000)	(6,500)
Remove Risk Adjustment	(13,822)	(5,705)	(8,117)
Other adjustments related to IFRS17	2,448	-	2,447
Claims provision future premium	(75,115)	(1,539)	(73,576)
Unexpired premium and claims cashflows	(9,982)	(742)	(9,240)
WBNI premium and claim cashflows	(111,223)	(6,632)	(104,591)
ENID	24,323	6,024	18,299
Expenses	61,032	-	61,032
Reinsurer Default	-	(1,261)	1,261
Impact of discounting	(34,766)	(4,771)	(29,995)
Risk Margin	23,860	-	23,860
Solvency II Total Technical Provisions	158,850	26,961	131,888

The tables below display's the Claims and Premiums Insurance liabilities separately. This Risk Margin of €23.9 is excluded.

Solvency II Claims Technical Provisions

Component	Gross Technical Provisions	Reinsurance Recoverables	Net Technical Provisions
Undiscounted IFRS LIC	304,595	47,587	257,008
Remove IFRS 17 expenses	-	-	-
Remove IFRS 17 ENID	(12,500)	(6,000)	(6,500)
Remove Risk Adjustment	(13,822)	(5,705)	(8,117)
Other adjustments related to IFRS 17	2,447	-	2,447
Undiscounted SII Expenses	4,525	-	4,525
Undiscounted SII ENID	12,500	6,000	6,500
Undiscounted Future Premium	(75,115)	(1,539)	(73,576)
Total Discounting	(24,107)	(4,744)	(19,363)
Reinsurer Default	-	(1,201)	1,201
Solvency II Claims Technical Provisions	198,523	34,398	164,125

Solvency II Premium Technical Provisions

Component	Gross Technical Provisions	Reinsurance Recoverables	Net Technical Provisions
Unexpired (undiscounted)			
Future premiums	(44,069)	(878)	(43,191)
UPR Received	4,663	-	4,663
Future claims	29,424	136	29,288
Future expenses	8,374	-	8,374
ENID	1,298	2	1,296
WBNYI (undiscounted)			
Future premiums	(361,761)	(11,676)	(350,085)
Future claims	250,537	5,044	245,493
Future expenses	48,133	-	48,133
ENID	10,525	22	10,503
Total Discounting	(10,659)	(27)	(10,632)
Total RI Default	-	(60)	60
Solvency II Premium Technical Provisions	(63,535)	(7,437)	(56,098)

The tables below present the valuation of technical provisions for each material line of business as defined by Solvency II, at 31 December 2024 and 31 December 2023. The technical provisions comprise the best estimate of claims provisions, the best estimate of premiums provisions and the risk margin.

Technical Provisions (EUR'000s) 31/12/2024	Direct business and accepted proportional reinsurance					Accepted non-proportional reinsurance	Total Non-Life Obligations	Total Life Obligations	Total Obligations
	Medical expense insurance	Motor vehicle liability insurance	Other motor insurance	Legal expenses	Miscellaneous financial loss	Non-proportional casualty reinsurance			
Total Best Estimate Gross	(9,535)	175,688	(19,104)	(2)	(11,563)	(963)	134,521	469	134,990
Risk Margin	713	20,997	1,827	41	-	231	23,809	51	23,860
Total Gross Technical Provisions	(8,822)	196,685	(17,277)	39	(11,563)	(732)	158,330	520	158,850

Technical Provisions (EUR'000s) 31/12/2023	Direct business and accepted proportional reinsurance					Accepted non-proportional reinsurance	Total Non-Life Obligations	Total Life Obligations	Total Obligations
	Medical expense insurance	Motor vehicle liability insurance	Other motor insurance	Legal expenses	Miscellaneous financial loss	Non-proportional casualty reinsurance			
Total Best Estimate Gross	(10,776)	130,279	(1,126)	215	(7,296)	(365)	110,931	521	111,453
Risk Margin	350	13,094	1,813	41	6	68	15,371	45	15,416
Total Gross Technical Provisions	(10,426)	143,373	687	256	(7,290)	(297)	126,302	566	126,868

The following tables present a summary of the Solvency II valuation of non-life and life technical provisions compared to the IFRS financial statements at 31 December 2024 and 31 December 2023.

31-Dec-24				31-Dec-23		
Technical Provisions (EUR'000s)	Solvency II Value	Statutory Accounts Value	Difference	Solvency II Value	Statutory Accounts Value	Difference
Technical provisions – non-life	167,153	204,677	(37,524)	136,728	182,398	(45,670)
Best Estimate	144,057			121,707		
Risk margin	23,096			15,021		
Technical provisions – health (similar to non-life)	(8,822)	5,480	(14,302)	(10,426)	3,649	(14,075)
Best Estimate	(9,535)			(10,776)		
Risk margin	713			350		
Technical provisions – life	520	520	-	566	566	-
Best Estimate	469			521		
Risk margin	51			45		
Total Technical Provisions	158,850	210,677	(51,827)	126,868	186,613	(59,745)

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) 31/12/2024	Solvency II Value	Statutory Accounts Value	Difference
Best Estimate of Claims Provisions/BE LIC	198,526	261,658	(63,601)
LIC Risk Adjustment	-	13,674	(13,674)
LRC	-	(64,655)	64,655
Best Estimate of Premiums Provisions	(63,535)	-	(63,535)
Risk Margin	23,860	-	23,809
Total	158,850	210,677	(52,346)

Technical Provisions (EUR'000s) 31/12/2023	Solvency II Value	Statutory Accounts Value	Difference
Best Estimate of Claims Provisions/BE LIC	172,311	218,012	(46,223)
LIC Risk Adjustment	-	14,913	(14,913)
LRC	-	(46,312)	46,312
Best Estimate of Premiums Provisions	(60,858)	-	(60,858)
Risk Margin	15,416	-	15,371
Total	126,868	186,613	(60,311)



The IFRS 17 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 €23.9m (2023: €15.4m) 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%.

Solvency II 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 31 December 2024.

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 €27.0m (2023: €29.3m) on a Solvency II basis compared to the Statutory Accounts value of €43.7m (2023: €40.5m). This difference of €16.7m 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 31 December 2024 and 31 December 2023 and information on material classes of liabilities is provided thereunder.

Other Liabilities	31-Dec-24			31-Dec-23		
	Solvency II Value	Statutory Accounts Value	Difference	Solvency II Value	Statutory Accounts Value	Difference
Deferred tax liabilities	4,001	-	4,001	5,795	784	5,011
Insurance & intermediaries payables	-	-	-	-	-	-
Reinsurance payables	-	1,539	(1,539)	-	405	(405)
Payables (trade, not insurance)	12,361	12,361	-	9,070	9,070	-
Any other liabilities, not elsewhere shown	-	-	-	-	-	-
Total Other Liabilities	16,362	13,900	2,462	14,865	10,259	4,605

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

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 €3.6m (2023: €3.2m) comprising general business expense accruals for professional fees, training costs, IT costs and others.
 - b) Insurance Premium Tax ("IPT") payable of €1.8m (2023: €3.5m). 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 €1.9m (2023: €2.2m).
 - d) Corporation tax payable of €1.9m (2023: €0.1m). This increase is driven by the additional CT payable due to the introduction of Pillar Two.
 - e) Financial assets traded not yet settled in bank of €2.4m
- 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.

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 2024 to 2027. 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.04.05.21 - Premiums, claims and expenses by country
- S.05.01.02 - Premiums, claims and expenses by line of business
- S.12.01.01 - Life and Health SLT Technical Provisions
- S.12.01.02 - Life Technical Provisions
- 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.



A nighttime photograph of a city street. In the foreground, a dark asphalt road with white crosswalk lines leads towards the background. On the left, several streetlights with bright yellow-orange glow illuminate the scene. In the background, several tall, modern skyscrapers with glass facades are visible, their windows lit up with warm white light. The sky is dark blue. A magenta rectangular box is overlaid on the lower right portion of the image, containing the chapter title.

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 31 December 2024 and 31 December 2023 by tiers. All the Company's own funds are classified as tier 1 unrestricted.

Tier 1 Unrestricted - Own Funds (EUR'000s)	Opening Balance at 31/12/2023	Movement in Period	Closing Balance at 31/12/2024
Paid in Ordinary Share Capital	49,950	-	49,950
Capital Contributions	10,000	-	10,000
Reconciliation Reserve	119,026	4,139	123,165
Total Tier 1 Unrestricted Own Funds	178,976	4,139	183,115

*Own funds available to cover SCR of €183m has been reduced by the foreseeable dividends of €23m.

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 31 December 2024 of €0.1m (2023: €0.6m). This arises due to the mark-to-market losses incurred in the Company's investment portfolio.

The Company recognised a deferred tax liability of €4.0m at 31

December 2024 (2023: €5.8m) 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 31 December 2024 and 31 December 2023.

Own Funds (EUR'000s)	31-Dec-24			31-Dec-23		
	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	(948)	-	(948)	(4,374)	-	(4,374)
Retained Earnings	115,104	-	115,104	77,825	-	77,825
IFRS 4-IFRS 17 Reconciliation Reserve	-	-	-	5,486	-	5,486
Difference in the valuation of assets	-	(17,356)	(17,356)	-	(15,049)	(15,049)
Difference in the valuation of technical provisions (non-life)	-	52,346	52,346	-	60,311	60,311
Difference in the valuation of technical provisions (life)	-	(519)	(519)	-	(566)	(566)
Difference in the valuation of other liabilities	-	(2,462)	(2,462)	-	(4,605)	(4,605)
Total	174,106	32,009	206,115	138,887	40,091	178,978

Adjustment for Solvency Purposes

The following summarises the adjustment for solvency purposes of €32m (2023: €40m) above:

- **Difference in valuation of assets of €17.4m (2023: €15m)**
 - Refer to section D.1. of this report
- **Difference in valuation of technical provisions of €52m (2023: €60m)**
 - Refer to section D.2. of this report
- **Difference in valuation of other liabilities of €(2)m (2023: €(5)m)**
 - 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, capital contributions and foreseeable dividends. Capital contributions are approved by the CBI as Tier 1 unrestricted own funds.

Reconciliation Reserve (EUR'000s)	31-Dec-2024	31-Dec-2023
Solvency II Balance Sheet - Excess of assets over liabilities	206,115	178,976
Ordinary Share Capital	(49,950)	(49,950)
Capital Contributions	(10,000)	(10,000)
Foreseeable dividends, distributions and charges	(23,000)	-
Reconciliation Reserve	123,165	119,026
Represented by		
Difference in the valuation of assets	(17,356)	(15,051)
Difference in the valuation of technical provisions	51,827	59,745
Difference in the valuation of other liabilities	(2,462)	(4,605)
Revaluation Reserve from the Statutory Accounts	(948)	(4,374)
Retained earnings from Statutory Accounts	115,104	77,825
Foreseeable dividends, distributions and charges	(23,000)	-
IFRS 4-IFRS 17 Reconciliation Reserve	-	5,486
Reconciliation Reserve	123,165	119,026

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 31 December 2024 and 31 December 2023.

Capital Requirement (EUR'000s)	31-Dec-2024	31-Dec-2023
Solvency Capital Requirement	125,844	107,509
Minimum Capital Requirement	45,276	36,012

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 31 December 2024 and 31 December 2023 split by risk modules.

Risk Modules (EUR'000s)	31-Dec-2024	31-Dec-2023
Market Risk	33,074	27,051
Counterparty Default Risk	16,404	12,900
Life Underwriting Risk	8	7
Health Underwriting Risk	10,868	9,512
Non-Life Underwriting Risk	108,886	94,148
Diversification	(37,087)	(30,901)
Intangible asset risk	-	-
Basic Solvency Capital Requirement	132,153	112,717
Operational Risk	11,669	10,151
Loss Absorbing Capacity of Deferred Taxes	(17,978)	(15,358)
Solvency Capital Requirement	125,844	107,510

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 31 December 2024 and 31 December 2023.

Inputs to MCR Calculation (EUR'000s) 31-Dec-2024 (Non-Life)	Net (of reinsurance/SPV) best estimate	Net (of reinsurance) written premiums in the last 12 months
Medical expense insurance and proportional reinsurance	-	21,404
Motor vehicle liability insurance and proportional reinsurance	146,899	193,428
Other motor insurance and proportional reinsurance	-	159,689
Legal expenses insurance and proportional reinsurance	31	1,449
Miscellaneous financial loss insurance and proportional reinsurance	-	12,490
Non-proportional property reinsurance	-	-

Inputs to MCR Calculation (EUR'000s) 31-Dec-2024 (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	75

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-2023	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	-	-

The overall MCR calculation is presented in the table below. Using the inputs in the table above results in a Linear MCR of €45.3m (2023: €36.0m).

Overall MCR Calculation (EUR'000s)	31-Dec-2024	31-Dec-2023
Linear MCR	45,276	36,012
SCR	125,844	107,509
MCR cap	56,630	48,379
MCR floor	31,461	26,877
Combined MCR	45,276	36,012
Absolute floor of the MCR	4,000	4,000
Minimum Capital Requirement	45,276	36,012

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 €18m at 31 December 2024 (2023: €15.4m).

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

- Deferred tax liability on the Solvency II balance sheet at 31 December 2024.
- 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 31 December 2024 or 31 December 2023.

E6. Any other information

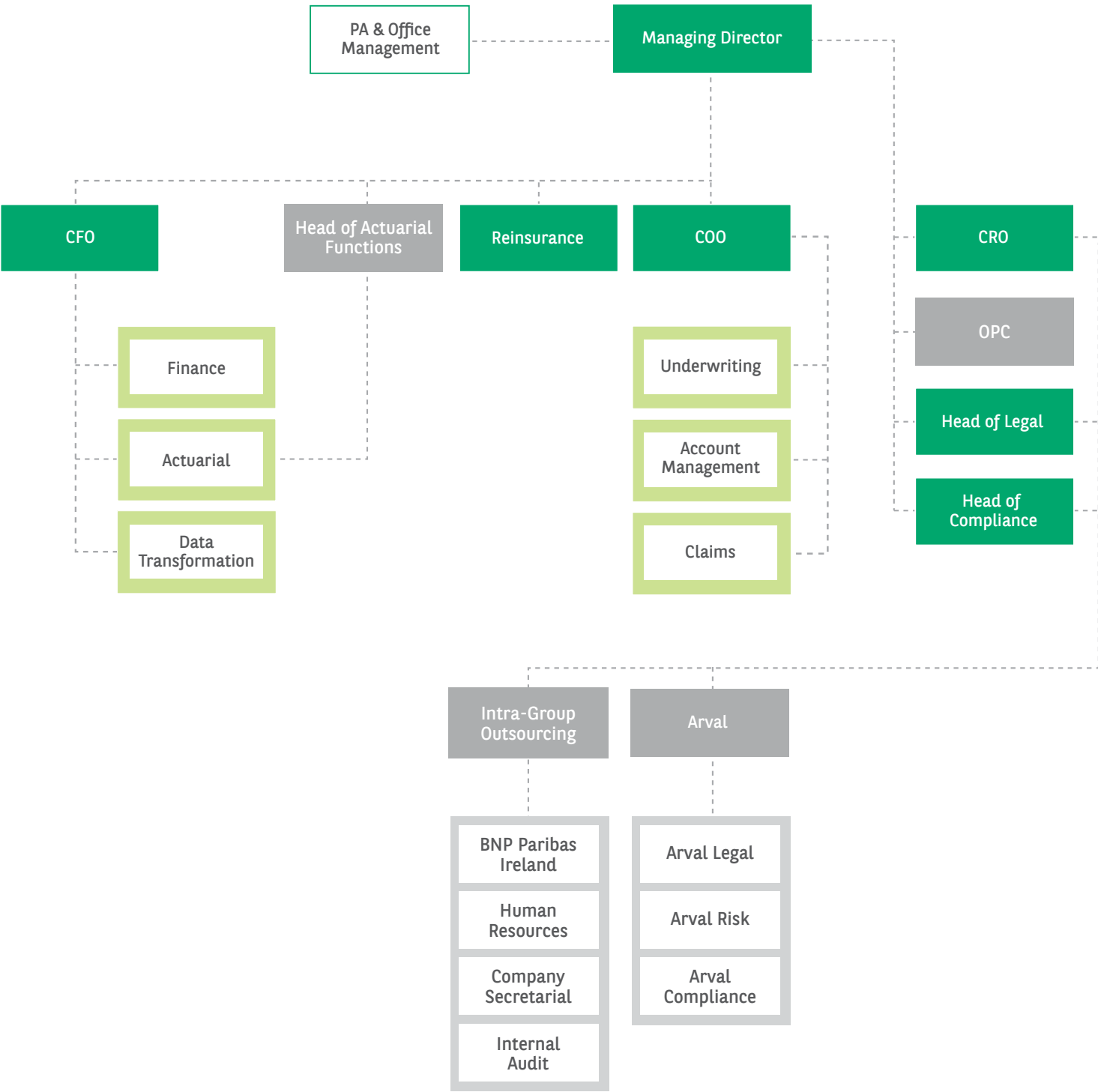
There is no other material information regarding the capital management of Greenval that has not been disclosed in section E above.

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 2024

All amounts expressed in €'000

S.02.01.02 Balance sheet

	Solvency II value C0010
Assets	
Intangible assets	R0030 -
Deferred tax assets	R0040 135
Pension benefit surplus	R0050 -
Property, plant & equipment held for own use	R0060 1,847
Investments (other than assets held for index-linked and unit-linked contracts)	R0070 277,161
Property (other than for own use)	R0080 -
Holdings in related undertakings, including participations	R0090 -
Equities	R0100 -
Equities - listed	R0110 -
Equities - unlisted	R0120 -
Bonds	R0130 216,587
Government Bonds	R0140 35,835
Corporate Bonds	R0150 180,752
Structured notes	R0160 (0)
Collateralised securities	R0170 -
Collective Investments Undertakings	R0180 53,895
Derivatives	R0190 -
Deposits other than cash equivalents	R0200 6,679
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 26,960
Non-life and health similar to non-life	R0280 26,567
Non-life excluding health	R0290 26,597
Health similar to non-life	R0300 (31)
Life and health similar to life, excluding health and index-linked and unit-linked	R0310 393
Health similar to life	R0320 -
Life excluding health and index-linked and unit-linked	R0330 393
Life index-linked and unit-linked	R0340 -
Deposits to cedants	R0350 2,447
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 72,314
Any other assets, not elsewhere shown	R0420 462
Total assets	R0500 381,327

S.02.01.02

Balance sheet

Liabilities

Technical provisions – non-life

Technical provisions – non-life (excluding health)

TP calculated as a whole

Best Estimate

Risk margin

Technical provisions - health (similar to non-life)

TP calculated as a whole

Best Estimate

Risk margin

Technical provisions - life (excluding index-linked and unit-linked)

Technical provisions - health (similar to life)

TP calculated as a whole

Best Estimate

Risk margin

Technical provisions – life (excluding health and index-linked and unit-linked)

TP calculated as a whole

Best Estimate

Risk margin

Technical provisions – index-linked and unit-linked

TP calculated as a whole

Best Estimate

Risk margin

Contingent liabilities

Provisions other than technical provisions

Pension benefit obligations

Deposits from reinsurers

Deferred tax liabilities

Derivatives

Debts owed to credit institutions

Financial liabilities other than debts owed to credit institutions

Insurance & intermediaries payables

Reinsurance payables

Payables (trade, not insurance)

Subordinated liabilities

Subordinated liabilities not in BOF

Subordinated liabilities in BOF

Any other liabilities, not elsewhere shown

Total liabilities

Excess of assets over liabilities

	Solvency II value
	C0010
R0510	158,330
R0520	167,151
R0530	-
R0540	144,056
R0550	23,096
R0560	(8,822)
R0570	-
R0580	(9,535)
R0590	713
R0600	520
R0610	-
R0620	-
R0630	-
R0640	-
R0650	520
R0660	-
R0670	468
R0680	51
R0690	-
R0700	-
R0710	-
R0720	-
R0740	-
R0750	-
R0760	-
R0770	-
R0780	4,001
R0790	-
R0800	-
R0810	-
R0820	-
R0830	-
R0840	12,361
R0850	-
R0860	-
R0870	-
R0880	-
R0900	175,212
R1000	206,115

S.04.05.21

Premiums, claims and expenses by country

		Home Country	Top 5 countries (by amount of gross premiums written) - non-life obligations					Total Top 5 and home country
		C0010	C0020	C0030	C0040	C0050	C0060	C0070
	R0010	C0080	FR	NL	BE	PL	IT	C0070
		C0080	C0090	C0100	C0110	C0120	C0130	C0140
Premiums written								
Gross - Direct Business	R0110		66,483	54,532	31,045	62,296	45,309	259,665
Gross - Proportional reinsurance accepted	R0120	73,648						73,648
Gross - Non-proportional reinsurance accepted	R0130							-
Reinsurers' share	R0140	746	2,782	1,356	1,735	999	3,016	10,634
Net	R0200	72,902	63,701	53,177	29,311	61,297	42,293	322,680
Premiums earned								
Gross - Direct Business	R0210		65,631	55,501	31,157	60,801	44,154	257,243
Gross - Proportional reinsurance accepted	R0220	68,204						68,204
Gross - Non-proportional reinsurance accepted	R0230							-
Reinsurers' share	R0240	1,224	1,427	1,520	1,337	1,359	4,643	11,510
Net	R0300	66,980	64,204	53,981	29,820	59,442	39,511	313,937
Claims incurred								
Gross - Direct Business	R0310		54,839	49,071	15,557	38,690	28,284	186,442
Gross - Proportional reinsurance accepted	R0320	46,620						46,620
Gross - Non-proportional reinsurance accepted	R0330						(666)	(666)
Reinsurers' share	R0340	(157)	6,246	3,996	395		850	11,330
Net	R0400	46,777	48,593	45,075	15,163	38,690	26,768	221,066
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	10,317	11,854	7,147	4,860	11,604	3,781	49,562
Other expenses	R1200							-
Total expenses	R1300							49,562

		Home Country	Top 5 countries (by amount of gross premiums written) - life obligations					Total Top 5 and home country
		C0150	C0160	C0170	C0180	C0190	C0200	C0210
	R1400	C0220						C0210
		C0220	C0230	C0240	C0250	C0260	C0270	C0280
Premiums written								
Gross	R1410	-	-	-	-	-	-	-
Reinsurers' share	R1420	-	-	-	-	-	-	-
Net	R1500	-	-	-	-	-	-	-
Premiums earned								
Gross	R1510	-	-	-	-	-	-	-
Reinsurers' share	R1520	-	-	-	-	-	-	-
Net	R1600	-	-	-	-	-	-	-
Claims incurred								
Gross	R1610	-	-	-	-	-	-	-
Reinsurers' share	R1620	-	-	-	-	-	-	-
Net	R1700	-	-	-	-	-	-	-
Changes in other technical provisions								
Gross	R1710	-	-	-	-	-	-	-
Reinsurers' share	R1720	-	-	-	-	-	-	-
Net	R1800	-	-	-	-	-	-	-
Expenses incurred	R1900	-	-	-	-	-	-	-
Other expenses	R2500							-
Total expenses	R2600							-

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

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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	-	-
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	468	468
Total recoverables from reinsurance/SPV and Finite Re before the adjustment for expected losses due	R0040	413	413
Recoverables from reinsurance (except SPV and Finite Re) before adjustment for expected losses	R0050	413	413
Recoverables from SPV before adjustment for expected losses	R0060	-	-
Recoverables from Finite Re before adjustment for expected losses	R0070	-	-
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due	R0080	393	393
Best estimate minus recoverables from reinsurance/SPV and Finite	R0090	75	75
Risk margin	R0100	51	51
Amount of the transitional on Technical Provisions			
Technical Provisions calculated as a whole	R0110	-	-
Best estimate	R0120	-	-
Risk margin	R0130	-	-
Technical provisions - total	R0200	520	520
Technical provisions minus recoverables from reinsurance/SPV and Finite RE - total	R0210	126	126
Best Estimate of products with a surrender option	R0220	-	-
Gross BE for Cash Flow			
Cash out-flows			
Futuer guaranteed and discretionary benefits	R0230	562	562
Future guaranteed benefits	R024		-
Future discretionary benefits	R0250		-
Future expenses and other cash out-flows	R0260	-	-
Cash in-flows			
Future premiums	R0270	-	-
other cash in-flows	R0280	-	-
Percentage of gross Best Estimate calculated using approximations	R0290	-	
Surrender Value	R0300	-	-
Best estimate subject to transitional of the interest rate	R0310	-	-
Technical provisions without transitional on interest rate	R0320	-	-
Best Estimate subject to volatility adjustment	R0330	-	-
Technical provisons without volatility adjustment and without others transitional measures	R0340	-	-
Best Estimate subject to matching adjustment	R0350	-	-
Technical provisons without matching adjustment and without all the others	R0360	-	-
Expected profits included in future premiums (EPIFP)	R0370	-	-
Gross TP Amount calculated using simplified methods	RTT01		

S.12.01.02 Life and Health SLT Technical Provisions

Technical provisions calculated as a whole

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

Technical provisions calculated as a sum of BE and RM Best Estimate

Gross Best estimate

Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default

Best estimate minus recoverables from reinsurance/SPV and Finite

Risk margin

Amount of the transitional on Technical Provisions

Technical Provisions calculated as a whole

Best estimate

Risk margin

Technical provisions - total

	Insurance with profit participation	Index-linked and unit-linked insurance		Other life insurance		Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations	Accepted reinsurance				Total (Life other than health insurance, incl. Unit-Linked)			
		Contracts without options and guarantees	Contracts with options or guarantees	Contracts without options and guarantees	Contracts with options or guarantees		Insurance with profit participation	Index-linked and unit-linked insurance	Other life insurance	Annuities stemming from non-life accepted insurance contracts and relating to insurance obligation other than health insurance obligations				
	C 0020	C 0030	C 0040	C 0050	C 0060	C 0070	C 0080	C 0090	C 0100	C 0110	C 0120	C 0130	C 0140	C 0150
R0010	-	-	-	-	-	-	-	-	-	-	-	-	-	-
R0020	-	-	-	-	-	-	-	-	-	-	-	-	-	-
R0030	-	-	-	-	-	-	-	468	-	-	-	-	-	-
R0080	-	-	-	-	-	-	-	393	-	-	-	-	-	-
R0090	-	-	-	-	-	-	-	75	-	-	-	-	-	-
R0100	-	-	-	-	-	-	-	51	-	-	-	-	-	-
R0110	-	-	-	-	-	-	-	-	-	-	-	-	-	-
R0120	-	-	-	-	-	-	-	-	-	-	-	-	-	-
R0130	-	-	-	-	-	-	-	-	-	-	-	-	-	-
R0200	-	-	-	-	-	-	-	530	-	-	-	-	-	-

Technical provisions calculated as a whole

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

Technical provisions calculated as a sum of BE and RM Best Estimate

Gross Best estimate

Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default

Best estimate minus recoverables from reinsurance/SPV and Finite

Risk margin

Amount of the transitional on Technical Provisions

Technical Provisions calculated as a whole

Best estimate

Risk margin

Technical provisions - total

	Health insurance (direct business)			Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Health reinsurance (reinsurance accepted)	Total (Health similar to life insurance)
	Contracts without options and guarantees	Contracts with options or guarantees				
	C 0160	C 0170	C 0180	C 0190	C 0200	C 0210
R0010	-	-	-	-	-	-
R0020	-	-	-	-	-	-
R0030	-	-	-	-	-	-
R0080	-	-	-	-	-	-
R0090	-	-	-	-	-	-
R0100	-	-	-	-	-	-
R0110	-	-	-	-	-	-
R0120	-	-	-	-	-	-
R0130	-	-	-	-	-	-
R0200	-	-	-	-	-	-

S.17.01.02 Non-life Technical Provisions

Technical provisions calculated as a whole

Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole

Technical provisions calculated as a sum of BE and RM

Best estimate

Premium provisions

Gross

Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default

Net Best Estimate of Premium Provisions

Claims provisions

Gross

Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default

Net Best Estimate of Claims Provisions

Total Best estimate - gross

Total Best estimate - net

Risk margin

Amount of the transitional on Technical Provisions

Technical Provisions calculated as a whole

Best estimate

Risk margin

Technical provisions - total

Technical provisions - total

Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total

Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total

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
R0010	-	-	-	-	-	-	-	-
R0050	-	-	-	-	-	-	-	-
R0060	(15,648)	-	(14,737)	(22,504)	-	-	-	-
R0140	(31)	-	(5,642)	(1,731)	-	-	-	-
R0150	(15,617)	-	(9,095)	(20,774)	-	-	-	-
R0160	6,113	-	190,425	3,401	-	-	-	-
R0240	-	-	34,431	(698)	-	-	-	-
R0250	6,113	-	155,994	4,100	-	-	-	-
R0260	(9,535)	-	175,688	(19,103)	-	-	-	-
R0270	(9,505)	-	146,899	(16,674)	-	-	-	-
R0280	713	-	20,997	1,827	-	-	-	-
R0290	-	-	-	-	-	-	-	-
R0300	-	-	-	-	-	-	-	-
R0310	-	-	-	-	-	-	-	-
R0320	(8,822)	-	196,685	(17,276)	-	-	-	-
R0330	(31)	-	28,789	(2,429)	-	-	-	-
R0340	(8,791)	-	167,895	(14,847)	-	-	-	-

Technical provisions calculated as a whole

Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole

Technical provisions calculated as a sum of BE and RM

Best estimate

Premium provisions

Gross

Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default

Net Best Estimate of Premium Provisions

Claims provisions

Gross

Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default

Net Best Estimate of Claims Provisions

Total Best estimate - gross

Total Best estimate - net

Risk margin

Amount of the transitional on Technical Provisions

Technical Provisions calculated as a whole

Best estimate

Risk margin

Technical provisions - total

Technical provisions - total

Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total

Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total

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
R0010	-	-	-	-	-	-	-
R0050	-	-	-	-	-	-	-
R0060	(194)	-	(10,451)	-	-	-	(63,535)
R0140	(34)	-	-	-	-	-	(7,437)
R0150	(161)	-	(10,451)	-	-	-	(56,098)
R0160	192	-	(1,112)	-	(963)	-	198,055
R0240	-	-	-	271	-	-	34,003
R0250	192	-	(1,112)	-	(1,234)	-	164,052
R0260	(2)	-	(11,563)	-	(963)	-	134,521
R0270	31	-	(11,563)	-	(1,234)	-	107,954
R0280	41	-	-	231	-	-	23,809
R0290	-	-	-	-	-	-	-
R0300	-	-	-	-	-	-	-
R0310	-	-	-	-	-	-	-
R0320	39	-	(11,563)	-	(732)	-	158,330
R0330	(34)	-	-	271	-	-	26,567
R0340	72	-	(11,563)	-	(1,003)	-	131,763

S.19.01.21 Non-life Insurance Claims Information

Total Non-Life Business

Accident year / Underwriting year

Z0010	1
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Gross Claims Paid (non-cumulative) (absolute amount)

(absolute amount)		Development year										
		0	1	2	3	4	5	6	7	8	9	10 & +
	Year	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110
Prior	R0110											
N-9	R0160	24,432	10,720	2,649	164	1,166	2,667	720	322	692	1,478	-
N-8	R0170	31,631	14,050	1,760	1,778	1,491	967	157	567	206		
N-7	R0180	38,257	16,892	3,612	1,382	1,523	862	1,762	721			
N-6	R0190	43,522	24,752	4,114	2,652	1,120	907	1,171				
N-5	R0200	52,792	33,244	6,757	1,610	2,621	2,367					
N-4	R0210	52,475	31,256	3,121	3,039	2,570						
N-3	R0220	76,897	47,021	6,079	3,399							
N-2	R0230	97,215	61,370	6,307								
N-1	R0240	99,675	99,538									
N	R0250	126,455										

Gross undiscounted Best Estimate Claims Provisions (absolute amount)

(absolute amount)

	Year	Development year										
		0	1	2	3	4	5	6	7	8	9	10 & +
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300
Prior	R0110											685
N-9	R0160	-	14,675	13,191	12,073	10,523	6,701	5,690	4,030	2,498	1,685	
N-8	R0170	29,807	11,457	7,952	5,222	3,909	2,419	1,867	1,264	1,342		
N-7	R0180	36,793	19,758	11,637	10,317	6,067	6,296	3,469	5,146			
N-6	R0190	39,851	15,889	12,741	10,970	8,639	4,244					
N-5	R0200	60,089	21,349	13,264	14,164	9,910	8,517	5,181				
N-4	R0210	55,582	23,048	22,251		14,855	14,520					
N-3	R0220	57,829	24,573	16,882	17,635							
N-2	R0230	74,702	31,657	25,764								
N-1	R0240	99,223	42,079									
N	R0250	99,516										

In Current year

Sum of years (cumulative)

	C0170	C0180
R0100	104	104
R0160	1,478	45,000
R0170	206	52,606
R0180	721	65,012
R0190	1,171	78,235
R0200	2,367	99,389
R0210	2,570	92,462
R0220	2,288	133,366
R0230	6,307	164,892
R0240	99,538	199,213
R0250	126,455	126,455
Total	R0260	244,316
		1,056,734

Year end (discounted data)

	C0360
R0100	583
R0160	1,494
R0170	1,233
R0180	4,527
R0190	4,563
R0200	7,436
R0210	12,730
R0220	15,494
R0230	22,828
R0240	37,362
R0250	89,805
Total	R0260 198,055

S.23.01.01

Own funds

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)
 Share premium account related to ordinary share capital
 Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings
 Subordinated mutual member accounts
 Surplus funds
 Preference shares
 Share premium account related to preference shares
 Reconciliation reserve
 Subordinated liabilities
 An amount equal to the value of net deferred tax assets
 Other own fund items approved by the supervisory authority as basic own funds not specified above

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

Deductions

Deductions for participations in financial and credit institutions

Total basic own funds after deductions

Ancillary own funds

Unpaid and uncalled ordinary share capital callable on demand
 Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand
 Unpaid and uncalled preference shares callable on demand
 A legally binding commitment to subscribe and pay for subordinated liabilities on demand
 Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC
 Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC
 Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC
 Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC
 Other ancillary own funds

Total ancillary own funds

Available and eligible own funds

Total available own funds to meet the SCR
 Total available own funds to meet the MCR
 Total eligible own funds to meet the SCR
 Total eligible own funds to meet the MCR

SCR

MCR

Ratio of Eligible own funds to SCR

Ratio of Eligible own funds to MCR

Reconciliation reserve

Excess of assets over liabilities
 Own shares (held directly and indirectly)
 Foreseeable dividends, distributions and charges
 Other basic own fund items
 Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds

Reconciliation reserve

Expected profits

Expected profits included in future premiums (EPIFP) - Life business
 Expected profits included in future premiums (EPIFP) - Non- life business

Total Expected profits included in future premiums (EPIFP)

	Total C0010	Tier 1 - unrestricted C0020	Tier 1 - restricted C0030	Tier 2 C0040
R0010	49,950	49,950	-	-
R0030	-	-	-	-
R0040	-	-	-	-
R0050	-	-	-	-
R0070	-	-	-	-
R0090	-	-	-	-
R0110	-	-	-	-
R0130	123,165	123,165	-	-
R0140	-	-	-	-
R0160	-	-	-	-
R0180	10,000	10,000	-	-
R0220	-	-	-	-
R0230	-	-	-	-
R0290	183,115	183,115	-	-
R0300	-	-	-	-
R0310	-	-	-	-
R0320	-	-	-	-
R0330	-	-	-	-
R0340	-	-	-	-
R0350	-	-	-	-
R0360	-	-	-	-
R0370	-	-	-	-
R0390	-	-	-	-
R0400	-	-	-	-
R0500	183,115	183,115	-	-
R0510	183,115	183,115	-	-
R0540	183,115	183,115	-	-
R0550	183,115	183,115	-	-
R0580	125,844	-	-	-
R0600	45,276	-	-	-
R0620	1.46	-	-	-
R0640	4.04	-	-	-
C0060	-	-	-	-
R0700	206,115	-	-	-
R0710	-	-	-	-
R0720	23,000	-	-	-
R0730	59,950	-	-	-
R0740	-	-	-	-
R0760	123,165	-	-	-
R0770	-	-	-	-
R0780	60,761	-	-	-
R0790	60,761	-	-	-

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

Market risk
 Counterparty default risk
 Life underwriting risk
 Health underwriting risk
 Non-life underwriting risk
 Diversification
 Intangible asset risk

Basic Solvency Capital Requirement**Calculation of Solvency Capital Requirement**

Operational risk
 Loss-absorbing capacity of technical provisions
 Loss-absorbing capacity of deferred taxes
 Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC

Solvency capital requirement excluding capital add-on

Capital add-on already set

Solvency capital requirement**Other information on SCR**

Capital requirement for duration-based equity risk sub-module
 Total amount of Notional Solvency Capital Requirement for remaining part
 Total amount of Notional Solvency Capital Requirements for ring fenced funds
 Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios
 Diversification effects due to RFF nSCR aggregation for article 304

Approach to tax rate

Approach based on average tax rate

Calculation of loss absorbing capacity of deferred taxes

LAC DT
 LAC DT justified by reversion of deferred tax liabilities
 LAC DT justified by reference to probable future taxable economic profit
 LAC DT justified by carry back, current year
 LAC DT justified by carry back, future years
Maximum LAC DT

	Gross solvency capital requirement	USP	Simplifications
	C0110	C0090	C0100
R0010	33,074		-
R0020	16,404		
R0030	8	-	-
R0040	10,868	-	-
R0050	108,886	-	-
R0060	(37,087)		
R0070	-		
R0100	132,153		

	C0100
R0130	11,669
R0140	-
R0150	(17,978)
R0160	-
R0200	125,844
R0210	-
R0220	125,844
R0400	-
R0410	-
R0420	-
R0430	-
R0440	-

	C0109
R0590	2

	C0130
R0640	- 17,987
R0650	- 4,001
R0660	
R0670	- 13,976
R0680	
R0690	- 17,979

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**

MCRNL Result	C0010	
	R0010	45,274

	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	-21,404
Income protection insurance and proportional reinsurance	R0030	-
Workers' compensation insurance and proportional reinsurance	R0040	-
Motor vehicle liability insurance and proportional reinsurance	R0050	146,899193,428
Other motor insurance and proportional reinsurance	R0060	-159,689
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	311,449
Assistance and proportional reinsurance	R0120	-
Miscellaneous financial loss insurance and proportional reinsurance	R0130	-12,490
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**

MCRL Result	C0040	
	R0200	1,574

	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	75
Total capital at risk for all life (re)insurance obligations	R0250	-

Overall MCR calculation

	C0070	
Linear MCR	R0300	45,276
SCR	R0310	125,844
MCR cap	R0320	56,630
MCR floor	R0330	31,461
Combined MCR	R0340	45,276
Absolute floor of the MCR	R0350	4,000
	C0070	
Minimum Capital Requirement	R0400	45,276





GREENVAL INSURANCE
BNP PARIBAS GROUP