Generali Hellas Insurance Company SA

SOLVENCY AND FINANCIAL CONDITION REPORT

generali.gr

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Introduction

Generali Hellas Insurance Company SA, falling under the scope of Solvency II Directive, reporting is required to predispose the Solvency and Financial Condition Report (SFCR).

This is in accordance with the Directive 2009/138/EC ('Solvency II Directive) as well as with the Delegated Regulation 2015/35/EC ('Delegated Act') and related Guidelines.

The objective of the Solvency and Financial Condition Report (SFCR) is to increase transparency in the insurance market requiring insurance and reinsurance undertakings to disclose publicly, at least on an annual basis, a report on their solvency and financial condition.

The document shall be approved by the Board of Directors of each reporting entity.

Policyholders and beneficiaries are the main addresses of SFCR benefitting from an increased market discipline that encourages best practices as well as from a higher market confidence that leads to an improved understanding of business.

SFCR specific content is defined by primary legislation and its implementing measures - which provide detailed information on the essential aspects of its businesses, such as a description of the activity and performance of the undertaking, the system of governance, risk profile, evaluation of assets and liabilities and capital management - for solvency purposes.

When disclosing the information referred to in this Regulation, figures reflecting monetary amounts shall be disclosed in thousands of units.

For the purposes of this Regulation 'reporting currency', unless otherwise required by the supervisory authority, shall be the currency used for the preparation of the insurance or reinsurance undertaking's financial statements.

When expressing the value of any asset or liability denominated in a currency other than the reporting currency, the value shall be converted in the reporting currency as if the conversion had taken place at the closing rate on the last day for which the appropriate rate is available in the reporting period to which the asset or liability relates.

When expressing the value of any income or expense, the value shall be converted in the reporting currency using such basis of conversion as that used for accounting purposes.

The conversion into the reporting currency shall be calculated by applying the exchange rate from the same source as used for the insurance or reinsurance undertaking's financial statements.

When references to other publicly available documents are included in the solvency and financial condition report, these references shall be done through references that lead directly to the information itself and not to a general document.

Insurance and reinsurance undertakings shall publicly disclose as part of their solvency and financial condition report at least the following templates:

- template S.02.01.02 of Annex I specifying balance sheet information using the valuation in accordance with Article 75 of Directive 2009/138/EC, following the instructions set out in section S.02.01 of Annex II to this Regulation
- template S.05.01.02 of Annex I, specifying information on premiums, claims and expenses using the valuation and recognition principles used in the undertaking's financial statements, following the instructions set out in section S.05.01 of Annex II to this Regulation, for each line of business as defined in Annex I of Delegated Regulation (EU) 2015/35
- template S.05.02.01 of Annex I, specifying information on premiums, claims and expenses by country using the valuation and recognition principles used in the undertaking's financial statements, following the instructions set out in section S.05.02 of Annex II
- template S.12.01.02 of Annex I, specifying information on the technical provisions relating to life insurance and health insurance pursued on a similar technical basis to that of life insurance ('health SLT') for each line of business as defined in Annex I to Delegated Regulation (EU) 2015/35, following the instructions set out in section S.12.01 of Annex II to this Regulation
- template S.17.01.02 of Annex I, specifying information on non-life technical provisions, following the instructions set out in section S.17.01 of Annex II to this Regulation for each line of business as defined in Annex I of Delegated Regulation (EU) 2015/35

- template S.19.01.21 of Annex I, specifying information on non-life insurance claims in the format of development triangles, following the instructions set out in section S.19.01 of Annex II for the total non-life business
- template S.22.01.21 of Annex I, specifying information on the impact of the long-term guarantee and transitional measures, following the instructions set out in section S.22.01 of Annex II
- template S.23.01.01 of Annex I, specifying information on own funds, including basic own funds and ancillary own funds, following the instructions set out in section S.23.01 of Annex II
- template S.25.01.21 of Annex I, specifying information on the Solvency Capital Requirement calculated using the standard formula, following the instructions set out in section S.25.01 of Annex II
- template S.25.02.21 of Annex I, specifying information on the Solvency Capital Requirement calculated using the standard formula and a partial internal model, following the instructions set out in section S.25.02 of Annex II
- template S.25.03.21 of Annex I, specifying information on the Solvency Capital Requirement calculated using a full internal model, following the instructions set out in section S.25.03 of Annex II
- template S.28.01.01 of Annex I, specifying the Minimum Capital Requirement for insurance and reinsurance undertakings engaged in only life or only non-life insurance or reinsurance activity, following the instructions set out in section S.28.01 of Annex II
- template S.28.02.01 of Annex I, specifying the Minimum Capital Requirement for insurance undertakings engaged in both life and non-life insurance activity, following the instructions set out in section S.28.02 of Annex II.

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Generali Hellas Insurance Company SA, falling under the scope of Solvency II Directive reporting are required to predispose the first SFCR with reference to the financial year starting from 1/1/2016.

CFO function has the Coordinator role for the SFCR production and owner of the overall document.

The document has been divided in terms of ownership of contents among company's Functions. One single Function has the accountability of each chapter and shall coordinate the collection and the related timing of information provided by all the Contributors of the related sections.

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Each chapter is numbered starting from letter A and the sections below include the indication of the Owner Function whereas a table recaps the Contributors and the related paragraphs to be developed.

Glossary

Gross written premiums: Equal to gross written premiums of direct business and accepted by third parties.

Gross direct premiums: Equal to gross written premiums of direct business

Combined Ratio (COR): It is a technical performance indicator of the P&C segment, calculated as the weight of the loss ratio and the acquisition and general expenses (expense ratio) on the earned premiums.

Solvency II ratio: defined as the ratio between the Eligible Own Funds and the Group Solvency Capital requirement, both calculated according to the definitions of the SII regime. Own funds are determined net of proposed dividend. The ratio has to be intended as preliminary since the definitive Regulatory Solvency Ratio will be submitted to the supervisory authority in accordance with the timing provided by the Solvency II regulations for the official reporting.

Equivalent consolidation area: Refers to equivalent consolidation scope.

Equivalent terms: Refers to equivalent exchange rates and equivalent consolidation scope.

Summary

Owner	Section	Please recap the content of the section and if applicable the changes compared to the document of the previous year
CFO Function	A.1. Business	
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CFO Function	E.6. Any other information	

A. Business and Performance

A.1. BUSINESS

Generali Hellas Insurance Company S.A. (the Company) is a Société Anonym Insurance Company, which operates in the insurance sector providing a wide range of general insurance and life insurance services to individuals and businesses, under the surveillance of the Bank of Greece and specifically the Department of Private Insurance Supervision (DEIA), which is the Regulatory Supervisory Authority of the Greek Private Insurance Market.

Its statutory aim is conducting all insurance, reinsurance and general financial services permitted in Société Anonym insurance companies, from the current respective Greek and Community law and operates under the provisions of Codified Law 2190/1920 "For Société Anonym Companies", Law Decree. 400/1970 "Regarding Private Insurance Undertakings", L.4364/2016 (FEK. 13.A/5-2-2016) for Solvency II and the decisions of the Ministry of Development as they have developed to date.

The external auditor of financial statements as well as SFCR, is Ernst &Young (HELLAS) Certified Auditors Accountants, which is the appointed audit firm since 2006.

The company is a subsidiary of Assicurazioni Generali SpA and its financial statements are consolidated line by line in the Group's financial statements. Assicurazioni Generali SpA holds 99.99% of the Company's Share Capital.

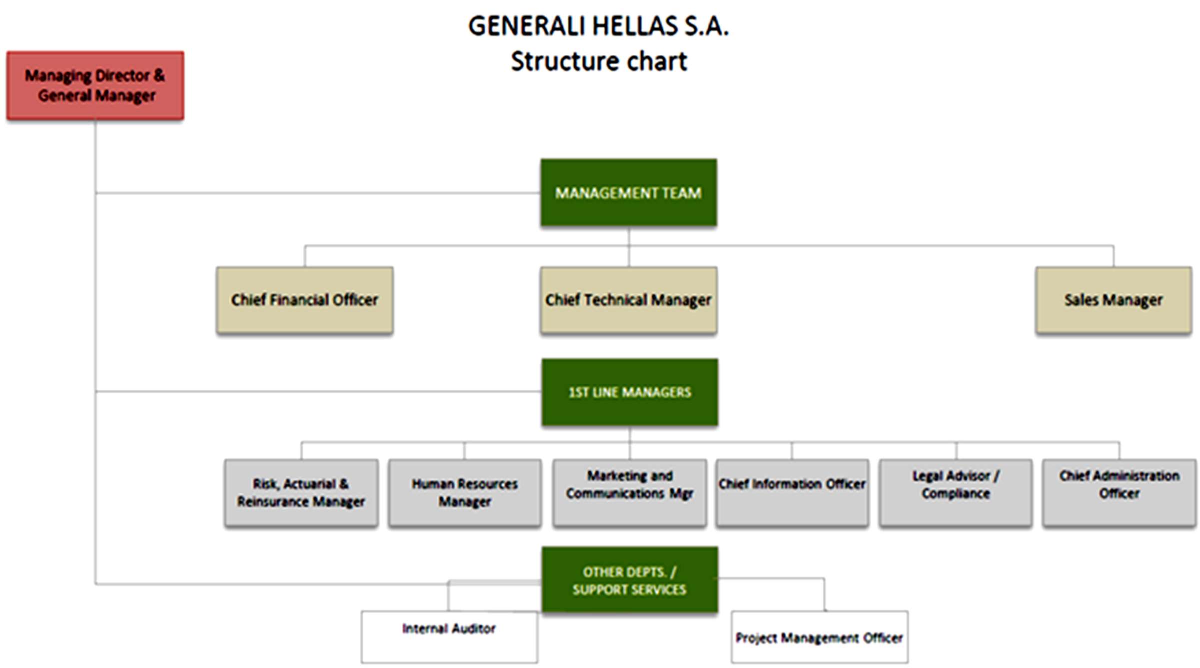
In particular, the company's share capital is as follows:

	%
Assicurazioni Generali SpA	99,99
Participatie Maatschappij Graafschap Holland N.V	0,01
Total Share Capital	**100,00**

Generali Hellas Insurance Company S.A. has no holdings in other companies.

There are no significant events after 31.12.2016 which require disclosure or adjustment to the accompanying financial statements.

Presented below, is the organizational structure of Generali Hellas SA, followed by a simplified group structure:



Generali Organization Charts

Generali Group organization is based on twelve Group Functions and eight Business Units including Italy, France, Germany, CEE, EMEA, Americas and Asia, and the Global Business Lines division.

EMEA

EMEA Regional Office

A.2. OVERALL PERFORMANCE

Gross Written Premiums

€183,8
million
+9,2%

61% P&C Segment Premiums
39% Life Segment Premiums

4,8%
Market Share

3,7% Life Segment Premiums
5,9% P&C Segment Premium

Result after taxes	Total Assets under Management	Own Funds	Solvency II Ratio
€ 5,07 million	€ 360 million	€ 63,9 million	134,5%
- 34,1%	+16,9%	+13,4%	

Our People

+3%
255
Employees

42% Men
58% Women

+14%
2.728
Intermediaries

+29%
301.912
Customers

The Company's total GWP's for the 2016 fiscal year stand at € 183,8 mln. marking an increase of 9,2% compared to 2015. It is especially noteworthy, that for quite a number of years, the Company has consistently outperformed its competitors, recording figures that are steadily above those of the market average, while also increasing its market share, which at year end 2016 stands at 4,8%.

Assessing our portfolio mix, it is clear that the performance of the P&C sector, which comprised 61% of our production, was key. The Life sector also showed dynamic growth, closing the year with an increase of 39%. All indices marked an increase compared to the previous year, with the single exception of the Net Result, which nevertheless closed very positively at €5,07 mln., decreased by 34,1% compared to an exceptional previous year. Own Funds marked an increase of 13,4% reaching € 63,9 mln., our improved solvency was recorded in the Solvency II Ratio of 134,5% and Total Assets under Management, reached €360 mln. Increased by 16,9%.

A.3. UNDERWRITING PERFORMANCE

Property & Casualty

In 2016, gross written premiums for P&C marked a significant increase of 10,5% compared to 2015, reaching 112,5 mln. Euro. The main factor behind this significant increase was the development noted in the Motor sector.

Result before taxes ranged at € 7,8 mil., marking a decrease of 22,8%, which was expected following the previous year's exceptional result. Also, NCR remained at the exceptional level of 88,2%, increased by 3,8 units.

Gross Written Premiums	Result Before Taxes	NCR
€ 112,5 million (+10,5%)	€ 7,8 million (-22,8%)	88,2% (+3,8 pps.)

Life

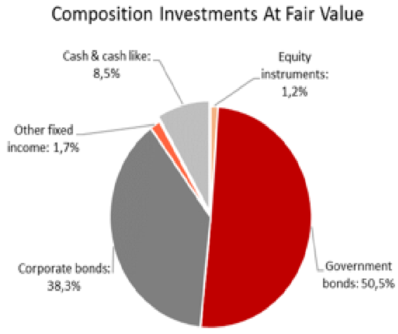
The Company solidified its position in the Life sector with innovative products that secured gross written premiums of € 71,2 mln. in 2016, increased by 7,3%.

Result before taxes was profitable at €0,6 mln. Despite the challenging investment environment. Also, NBV closed very favorably at € 5,6 mln. Increased by 51%.

Gross Written Premiums	Result Before Taxes	NBV
€ 71,2 million (+7,3%)	€ 0,6 million (+211,8%)	€ 5,6 million (+51,0%)

A.4. INVESTMENT PERFORMANCE

Investments at Fair Value	P&C	LIFE	TOTAL	%
General Investment Accounts	**194.330**	**146.036**	**340.366**	**100%**
Equity instruments	-	4.025	4.025	1,2%
Fixed income investments	172.786	134.772	307.558	90,4%
Government bonds	102.846	68.884	171.731	50,5%
Corporate bonds	66.035	64.167	130.202	38,3%
Other fixed income	3.905	1.721	5.625	1,7%
Real estate investments	-	-	-	0,0%
Cash & cash like	21.544	7.239	28.783	8,5%
Other investments	-	-	-	0,0%



Stocks of UG/L on and off Balance Sheet	P&C	LIFE	TOTAL
General Investment Accounts	**1.895**	**14.858**	**16.753**
Equity instruments	-	25	25
Fixed income investments	1.895	14.833	16.728
Government bonds	1.477	11.582	13.059
Corporate bonds	418	3.218	3.637
Other fixed income	-	33	33
Real estate investments	-	-	-
Cash & cash like	-	-	-
Other investments	-	-	-

P&L Investment income	P&C	LIFE	TOTAL
TOTAL	**2.384**	**4.294**	**6.678**
Current Income	3.040	4.254	7.294
Net Realized gains	- 419	131	- 288
Net Unrealised G/L at P&L	-	-	-
Impairment	-	-	-
Investment Expenses	- 237	- 91	- 328

Portfolio's Allocation in 2016 is allocated by 90,4% on Fixed Income Asset Class, in favor of Government issuers by 50,5%, while Corporate issuers hold 38,3%. Due to the enforced capital controls and the strict Generali investment strategy, the cash & cash like account stands at € 28,8 mln holding the significant 8,5% of Total Investment portfolio.

The Portfolio's results produced a Total Investment Income of € 6,7 mln, despite the non-invested cash due to capital controls. Current Income, deriving mainly from Interests from Fixed Income Investments, stood at € 7,3 mln.

A.5. PERFORMANCE OF OTHER ACTIVITIES

There is no other material performance in other activities to be reported.

A.6. ANY OTHER INFORMATION

Related Parties' Transactions and Balances

Statement of Comprehensive Income includes revenues and costs, arising from transactions between the Company and related companies. Related parties include the parent company and the companies controlled or influenced by key management personnel or shareholders of the Company. These transactions relate to sales and purchases of services during normal business operation. Total transactions of the Company with related companies for 2016 stood at € 16,0 mln, while total outstanding balances at 17,3 mln respectively. All related party transactions concern reinsurance activities, involving mainly the parent company "Assicurazioni Generali S.p.A." and "Assicurazioni Generali S.p.A. UK Branch".

Annex

QRT TEMPLATES VALID FOR SOLO PURPOSES

Premiums, claims and expenses by line of business (1/3)

	Line of Business for: Non-Life Insurance and Reinsurance Obligations (direct business and accepted proportional reinsurance)								
	Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance
Premiums written									
Gross - Direct Business	0	2.542	0	38.094	11.628	5.886	36.916	11.176	0
Gross - Proportional reinsurance accepted	0	0	0	0	0	71	1.130	178	0
Gross - Non-proportional reinsurance accepted	0	0	0	0	0	0	0	0	0
Reinsurers' share	0	34	0	1.280	290	2.774	15.582	2.434	0
Net	**0**	**2.508**	**0**	**36.814**	**11.337**	**3.183**	**22.463**	**8.920**	**0**
Premiums earned									
Gross - Direct Business	0	2.503	0	35.790	10.815	6.022	36.056	10.969	0
Gross - Proportional reinsurance accepted	0	0	0	0	0	65	1.049	183	0
Gross - Non-proportional reinsurance accepted	0	0	0	0	0	0	0	0	0
Reinsurers' share	0	36	0	1.306	334	2.838	15.416	2.527	0
Net	**0**	**2.468**	**0**	**34.483**	**10.480**	**3.249**	**21.689**	**8.625**	**0**
Claims incurred									
Gross - Direct Business	0	336	0	19.999	6.021	1.319	8.988	7.414	0
Gross - Proportional reinsurance accepted	0	0	0	0	0	7	102	11	0
Gross - Non-proportional reinsurance accepted	0	0	0	0	0	0	0	0	0
Reinsurers' share	0	32	0	226	-48	424	1.271	590	0
Net	**0**	**304**	**0**	**19.773**	**6.068**	**902**	**7.819**	**6.835**	**0**
Changes in other technical provisions									
Gross - Direct Business	0	0	0	0	0	0	0	0	0
Gross - Proportional reinsurance accepted	0	0	0	0	0	0	0	0	0
Gross - Non-proportional reinsurance accepted	0	0	0	0	0	0	0	0	0
Reinsurers' share	0	0	0	0	0	0	0	0	0
Net	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**
Expenses incurred	**0**	**782**	**0**	**11.969**	**3.314**	**1.120**	**9.535**	**3.175**	**0**
Other expenses	0	0	0	0	0	0	0	0	0
Total expenses	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**

Premiums, Claims and Expenses by line of business (2/3)

	Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)			Line of Business for: accepted non-proportional reinsurance				Total
	Legal expenses insurance	Assistance	Miscellaneous financial loss	Health	Casualty	Marine, aviation, transport	Property	
Premiums written								
Gross - Direct Business	0	3.615	1.170	0	0	0	0	**111.025**
Gross - Proportional reinsurance accepted	0	0	110	0	0	0	0	**1.489**
Gross - Non-proportional reinsurance accepted	0	0	0	0	0	0	0	**0**
Reinsurers' share	0	2.430	187	0	0	0	0	**25.011**
Net	**0**	**1.185**	**1.093**	**0**	**0**	**0**	**0**	**87.504**
Premiums earned								
Gross - Direct Business	0	3.254	924	0	0	0	0	**106.331**
Gross - Proportional reinsurance accepted	0	0	74	0	0	0	0	**1.372**
Gross - Non-proportional reinsurance accepted	0	0	0	0	0	0	0	**0**
Reinsurers' share	0	2.430	146	0	0	0	0	**25.034**
Net	**0**	**824**	**852**	**0**	**0**	**0**	**0**	**82.669**
Claims incurred								
Gross - Direct Business	0	2	198	0	0	0	0	**44.276**
Gross - Proportional reinsurance accepted	0	0	4	0	0	0	0	**125**
Gross - Non-proportional reinsurance accepted	0	0	0	0	0	0	0	**0**
Reinsurers' share	0	0	22	0	0	0	0	**2.517**
Net	**0**	**2**	**180**	**0**	**0**	**0**	**0**	**41.884**
Changes in other technical provisions								
Gross - Direct Business	0	0	0	0	0	0	0	**0**
Gross - Proportional reinsurance accepted	0	0	0	0	0	0	0	**0**
Gross - Non-proportional reinsurance accepted	0	0	0	0	0	0	0	**0**
Reinsurers' share	0	0	0	0	0	0	0	**0**
Net	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**
Expenses incurred	**0**	**714**	**425**	**0**	**0**	**0**	**0**	**31.034**
Other expenses	0	0	0	0	0	0	0	**2.525**
Total expenses	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**33.559**

Premiums, Claims and Expenses by line of business (3/3)

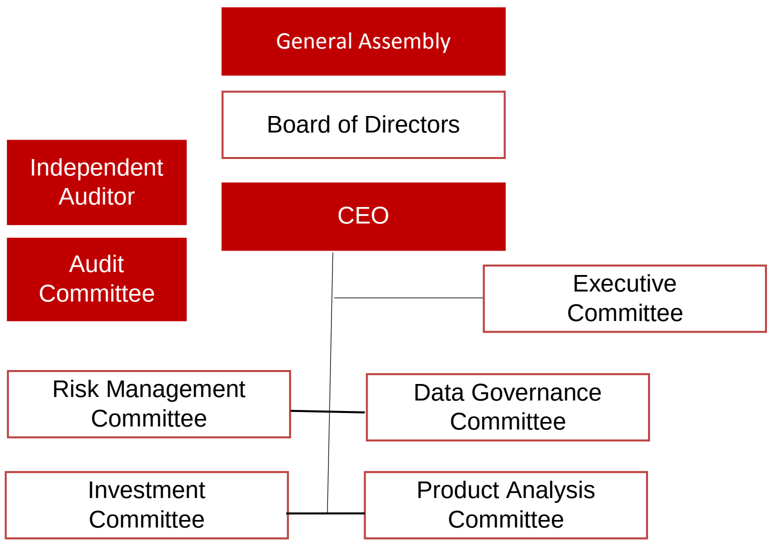
	Line of Business for: life insurance obligations				Life reinsurance obligations			Total
	Health insurance	Insurance with profit participation	Index-linked and unit-linked insurance	Other life insurance	Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations	Health reinsurance	Life reinsurance	
Premiums written									
Gross - Direct Business	49.742	7.269	977	2.208		0	0	0	**60.197**
Reinsurers' share	5.295	0	0	0		0	0	0	**5.295**
Net	**44.447**	**7.269**	**977**	**2.208**		**0**	**0**	**0**	**54.901**
Premiums earned									
Gross - Direct Business	49.742	7.269	977	2.208		0	0	0	**60.197**
Reinsurers' share	5.295	0	0	0		0	0	0	**5.295**
Net	**44.447**	**7.269**	**977**	**2.208**		**0**	**0**	**0**	**54.901**
Claims incurred									
Gross - Direct Business	29.222	8.096	951	1.076		0	0	0	**39.344**
Reinsurers' share	4.238	0	0	0		0	0	0	**4.238**
Net	**24.984**	**8.096**	**951**	**1.076**		**0**	**0**	**0**	**35.106**
Changes in other technical provisions									
Gross - Direct Business	-1.612	-2.985	-47	-37		0	0	0	**-4.681**
Reinsurers' share	-69	0	0	0		0	0	0	**-69**
Net	**-1.543**	**-2.985**	**-47**	**-37**		**0**	**0**	**0**	**-4.612**
Other expenses	0	0	0	0		0	0	0	**328**
Total expenses	**0**	**0**	**0**	**0**		**0**	**0**	**0**	**17.492**

B. System of Governance

B.1. GENERAL INFORMATION ON THE SYSTEM OF GOVERNANCE

B.1.1. INFORMATION ON GENERAL GOVERNANCE: STRUCTURE OF ADMINISTRATIVE, MANAGEMENT OR SUPERVISORY BODIES, DESCRIPTION OF ROLES AND RESPONSIBILITIES, DETAILS ON THE SEGREGATION OF RESPONSIBILITIES (EXISTENCE OF RELEVANT COMMITTEES MUST BE DISCLOSED)

The Generali Hellas' System of Governance consists of the following:



Board of Directors

The Board of Directors has ultimate responsibility for the carrying out of business, strategy setting and for the setting up of an effective risk management and internal control system, verifying its adequacy over time. The Board of Directors is ultimately responsible for setting strategies and policies in the area of risk management and internal control and ensuring their adequacy and sustainability over time, in terms of completeness, functioning and effectiveness.

- Jaime Anchustegui Melgarejo (Chairman)
- Roberto Gasso
- Panagiotis Dimitriou
- Konstantinos Venetis (independent)

Executive Committee

The Executive Committee is composed by executive directors; its mission is to plan the strategy of the Company, to solve all high level managerial issues and to decide about any crucial issue regarding the performance of the Company.

The members of the Executive Committee are the following:

- Panagiotis Dimitriou — Managing Director and General Manager
- Panagiotis Vasilopoulos — Chief Technical Manager
- Elias Rigas — Chief Financial Officer

Internal Audit Committee

The Audit Committee is composed of non-executive and independent directors; its mission is to advise the Management Board, and to put forward proposals regarding the internal control and risk management system.

The members of the Internal Audit Committee are the following:
- Jaime Anchustegui Melgarejo
- Roberto Gasso
- Konstantinos Venetis

Risk Committee

The Risk Committee acts as an advisory body, to provide support to the Company's Top Management in defining the Company's target risk and the related levels of economic capital; in monitoring the risk profile on the basis of reports prepared by the Company's Risk Management function and in setting any corrective strategies. The Risk Committee includes the CEO, the General Manager and CFO, the CRO and the Heads of the Company's main areas / operating units.

The members of the Risk Committee are the following:
- Panagiotis Dimitriou (Managing Director and General Manager)
- Panagiotis Vasilopoulos (Chief Technical Manager)
- Elias Rigas (Chief Financial Officer)
- Manolis Tsironis (Investments Supervisor)
- Ioannis Sinos (Risk, Actuarial & Reinsurance Manager)
- Stylianos – Antonis Dimitriou (Actuarial Supervisor)
- Georgios Theodorakopoulos (Internal Auditor - observator)
- Maria Skouteropoulou (Legal Advisor & Compliance Officer)

Investment Committee

The Investment Committee in respect to Company strategic planning, conducts the investment strategy, eligible to Group Risk Guidelines, and controls the compliance of the Investments procedure in respect to the limits set by the Group Risk Guidelines and the evolution of actual results in comparison to target's achievement for precaution measures.

The members of the Investment Committee are the following:
- Panagiotis Dimitriou (Managing Director and General Manager)
- Elias Rigas (Chief Financial Officer)
- Manolis Tsironis (Investments Supervisor)
- Ioannis Sinos (Risk, Actuarial & Reinsurance Manager)

Product Analysis Committee

The Product Analysis Committee is responsible to certify that the products provided by the Company are in alignment with the quality and profitability standards that are set by the HO, and that these products follow the local market trends. In parallel, this Committee ensures that through the aforementioned products the company provides the client with the best insurance solution.

The members of the Product Analysis Committee are the following:
- Panagiotis Vasilopoulos (Chief Technical Manager)
- Elias Rigas (Chief Financial Officer)
- Ioannis Sinos (Risk, Actuarial & Reinsurance Manager)
- Stylianos – Antonis Dimitriou (Actuarial Supervisor)
- Maria Skouteropoulou (Legal Advisor & Compliance Officer)

B.1.2. CHANGES IN THE SYSTEM OF GOVERNANCE (ONLY MATERIAL CHANGES THAT HAVE TAKEN PLACE OVER THE REPORTING PERIOD MUST BE DISCLOSED)

No changes in Generali Hellas' System of Governance to be reported, since this is the first submission of the Solvency and Financial Condition Report (SFCR).

B.1.3. REMUNERATION POLICY (FIXED AND VARIABLE COMPONENTS, PERFORMANCE CRITERIA, SUPPLEMENTARY PENSIONS)

The remuneration policy is a key element for Generali Hellas Insurance Company SA and reflects its values: the mission of the Company is to protect and improve people's lives through the provision of insurance services. The Company proactively pursue this goal, taking care of the future of its customers and of people, dedicating itself to the core insurance business, managing and mitigating the risks of individuals and institutions with the commitment to create value for its stakeholders.

Through the remuneration policy, the Company aims to attract, motivate and retain the people who - for their technical and managerial skills and their different profiles in terms of origins, gender and experience - are a key factor for the success of the Company, as reflected in its values.

The Company's reward approach is based on the total remuneration concept. Employees are compensated with the following components:

- Fixed remuneration
- Benefits
- Variable remuneration: all incumbents in executive roles also have access to a variable remuneration.

Fixed Remuneration

Fixed remuneration includes base salary, legally required additional payments, allowances. The structure of fixed remuneration is determined by local regulations, local market benchmark and company practices.

The fixed salary remunerates the role held and responsibilities assigned, also considering the experience of the relevant incumbent and the skills required, as well as the quality of the contribution made in terms of achieving business results.

The weight of the fixed remuneration must be such as to attract and retain our people, and at the same time must also sufficiently remunerate the role, even if the variable component should not be disbursed due to failure to achieve individual, Company or Group targets, this reduces the possibility of conduct that is not in line with the Company's risk appetite framework.

As for the other components of the remuneration, the fixed part is also measured annually in comparison with market trends.

Benefits

Benefits are a substantial component of the remuneration package – within a total remuneration approach - which complement monetary payments. The type and overall value of benefits differ according to category of beneficiaries.

More specifically, supplementary pensions and healthcare are governed by individual contracts, applicable collective bargaining agreements and company level regulations. The company level regulation also provides for other guarantees, such as the Long-Term Care in the event of permanent disability, and the guarantees in the event of death or total permanent disability caused by injury or disease, whether occupational or otherwise.

Benefits package may also include personal and business use of a company car with fuel card (alternatively car allowance can be provided), dedicated assistance in case of emergency and agreements with airport operators (e.g. corporate frequent flyer cards). Moreover, favorable contractual conditions are also granted, in respect to all applicable regulations, with regards to, for example, the subscription of insurance, banking or other Generali Group products, along with facilitated access to loans, mortgages for buying houses or vehicles, as well as other benefits or reimbursements related to company events or specific company initiatives.

Other benefits can be assigned for a definite period of time, in line with market practices, in case of internal or international mobility such as housing, children education and other relocation allowances linked to relocation.

Variable Remuneration

The variable remuneration seeks to motivate employees to achieve business targets by creating a direct link between incentives and quantitative and qualitative targets set at Group, Region, Country, Business / Function and individual level. Performance is assessed by taking a multi-perspective approach that, according to the time frame considered, evaluates the results achieved by the individuals, those achieved by the business units in which said individuals work and the Group results as a whole.

The variable remuneration opportunities vary for each participant, according to the organizational level, the possibility of having a direct influence on Group results and the impact of the individual role on the business. The time horizon for the variable remuneration also differs according to the role, with greater weighting assigned to the long-term component for the positions expected to play a key role in determining long-term sustainable performance.

The Group guidelines on variable remuneration ensure alignment with regulatory requirements and the recommendations made by the control functions. Individual contracts contain specific details on the maximum amount of the variable remuneration and the proportions of the short and long-term components.

The process to define the remuneration policy is managed within the Local Governance framework, taking into consideration also the local circumstances, with particular attention to the local practice in terms of contractual levels, pay-mix and eligibility on incentives plan with a final purpose to maintain our reward packages competitive and to attract the best people.

B.1.4. INFORMATION ON RISK MANAGEMENT, INTERNAL AUDIT, COMPLIANCE AND ACTUARIAL FUNCTIONS INTEGRATION INTO THE ORGANIZATIONAL STRUCTURE AND THE DECISION-MAKING PROCESSES OF THE UNDERTAKING. STATUS AND RESOURCES OF THE FOUR FUNCTIONS WITHIN THE UNDERTAKING

Risk Management

The Risk Management function acts as guarantor for the correct implementation of the risk management system, as required by law and as established by the BoD.

The Risk Management function supports the BoD and the Senior Management in granting the effective implementation of the risk management system, as required by law and internal regulation. The function supports the BoD and Senior Management in the definition of risk management strategies and provides tools for risk identification, monitoring, management and measurement. Risk Management also provides, through an adequate reporting system, the elements for assessing risk exposures and tightness of the end-to-end risk management system. The Risk Management function at all levels has a clearly defined mandate that establishes its role within the overall structure in light of the Internal Control and Risk Management system, where Risk Management function is identified as a second line of defense in the three lines of defense system.

Risk Management function has full access, in accordance with local laws and regulations, to all information, systems and documentation related to activities within the risk management scope and they may attend relevant BoD and Committee meetings (i.e. Risk Committee, Internal Control Committee meetings), to raise risk related matters, whenever appropriate. Information and documents accessed shall be handled in a prudent and confidential manner.

Local Risk Management is in charge of performing risk management activities at Legal Entity level. Subject to the applicable laws and regulations, the local Risk Management takes the leadership and responsibility for all risk management activities of the relevant perimeter and is in charge to apply Group policies and guidelines at Legal Entity level, ensuring risks are managed accordingly. Specifically, local Risk Management is responsible to:

- Monitor Legal Entity risks in line with risk related policies, guidelines and operating procedures, consistency with the defined risk strategy and risk limits
- Run the local risk function, embedding risk related Group policies, guidelines and operating procedures at Legal Entity level
- Participate and bring risk view into Legal Entity business processes, in accordance to the relevant processes and guidelines
- Monitor risk process at Legal Entity level and adherence to risk limits
- Report risk results and risk related reports to Main Country/ Region/ Division Risk Management and relevant Legal Entity Governance bodies
- Escalate to Main Country/ Region /Division Risk Management and relevant Legal Entity Governance bodies in case of breaches.

Internal Audit

As described in chapter B.5.

Compliance

The Compliance function participates in protecting the Company from loss and damage, improving the way business is done.

The Compliance function's mission is:

- to contribute in safeguarding the integrity and reputation of the entity
- to reinforce the entity's compliance awareness, transparency and responsibility towards stakeholders
- to support a steady and persistent business operation and build a sustainable competitive advantage by integrating compliance risk management in the daily activities and strategic planning.

In this context, the Compliance function is the administrative capacity for ensuring that all the actions of the Company comply with applicable laws and regulatory requirements. The Compliance function includes advising the Board of Directors and the senior management on compliance with laws, regulations, internal rules and administrative provisions adopted pursuant the responsibilities assigned to the Compliance function by the relevant Regulatory Authorities.

It also includes an assessment of the possible impact of any changes in the legal environment on the operations of the entity concerned and the identification, assessment and management of the related compliance risk.

The Compliance function assists in identifying, assessing, and monitoring compliance risks arising from failure to comply with the applicable laws and regulations and internal rules and participates, in an independent way, to the effective management of risks.

The key Compliance function's activities can be summarized as follows:

- Reported Concerns and Incorrect Conduct Management
  - ✓ managing the concerns reported both directly or through the whistleblowing channel according to the relevant Group Rules
- Group Compliance-related Policies Implementation
  - ✓ supervising the implementation, also performing adequate controlling activities, of compliance policies relevant at Group level (Compliance related policies), such as the Related party transactions procedure, the Code of Conduct implementing Group Rules falling within the scope of the Compliance function and FATCA – Group Compliance program, AML and personal data protection policies and any other Group Compliance program.
- Monitoring of the Legal Framework
  - ✓ identifying on a continual basis the regulations applicable to the entity and assess the impact on its processes and procedures. In order to assess the possible impact on the entity of significant changes in the legal environment, as well as identify and assess the compliance risk that could arise from such changes, the Compliance function monitor projected revisions of legislation and plan to introduce new regulation.
- Compliance Risk Management
  - ✓ assessing the adequacy and effectiveness of the organizational measures adopted to prevent the risk of non-compliance with internal and external standards, according to the Group Compliance Risk Assessment Methodology;
  - ✓ proposing organizational and procedural changes aimed at ensuring adequate control over the compliance risk;
  - ✓ assessing the effectiveness of the organizational improvements following the compliance recommendations proposed to the business (action-tracking);
  - ✓ taking part in new business projects with the aim to assess ex-ante the compliance risk associated to them. The Compliance function identify, document and assess the compliance risk associated with the business activities, including the development of new products and business practices, the proposed establishment of new types of business or customer relationship or material changes in the nature of such relationship.
- Advising
  - ✓ assisting the Board of Directors and senior management in managing effectively the compliance risk faced by the business, support and advise the business on all the topics where there is a compliance risk, keeping them informed on developments in the area.

- Reporting
  - ✓ reporting to the Board of Directors and to the Group Compliance Officer and/or to the Country/Regional Compliance Officer on the activities performed on a regular basis and on any major compliance failures as soon as identified. Compliance issues that need to be reported immediately are: cancellation or suspension of the license or authorization to operate, criminal sanctions, material administrative fines and incidents that carry a high reputational risk, changes in the legal environment having a material impact on the business or on the entities' risk profile, inspections by Regulatory Authorities.

Actuarial function

As described in chapter B.6.

B.1.5. INFORMATION ON AUTHORITIES, RESOURCES, PROFESSIONAL QUALIFICATIONS, KNOWLEDGE, EXPERIENCE AND OPERATIONAL INDEPENDENCE OF THE FUNCTIONS AND HOW THEY REPORT TO AND ADVISE THE ADMINISTRATIVE, MANAGEMENT OR SUPERVISORY BODY OF THE INSURANCE OR REINSURANCE UNDERTAKING

Risk Management

The Risk Management function complies with the following requirements as per their qualifications, knowledge and experience:

- The CRO has the necessary qualifications, knowledge, experience and professional and personal skills which enable him to carry out his duties effectively. He has a solid relevant experience in insurance industry, in risk management practices and in actuarial function's duties.
- The CRO has the capacity to relate to the commercial mind-set of the business and develop an overall understanding of the organization from the operational and strategic point of view. The CRO shall follow the applicable risk policies, which set out the relevant responsibilities, goals, processes and reporting procedures to be applied.
- All the personnel belonging to Risk Management function own above requirements and characteristics, commensurate with the degree of complexity of the activities to be carried out.
- The fitness requirements are being maintained at an appropriate and adequate level at all times.
- The evaluation of the fitness requirement outlined above should be performed on the basis of the procedure indicated in the Group Fit and Proper Policy.

In terms of resources, the Risk Management Function currently consists of three people. All of them possess an actuarial – risk preparation, with a BSc degree in actuarial, statistics or mathematics, all of them possess a Master's degree in actuarial science (MSc).

The Risk Management function is responsible for the overall risk profile monitoring and reporting to the BoD, Senior Management and Risk Owners (within the limits of their competencies), as defined in the regulatory framework and in the Internal Control and Risk Management system. The risk reporting is coordinated at Group level in order to grant a common reporting framework, and shall take into consideration additional local specific reporting requirements.

Internal risk reporting to the BoD and the Senior Management includes:

- ORSA Reporting.
- Results of stress tests and limits breaches.
- Risk trends and other reporting to BoD and Senior Management in line with regulatory requirements and best practices.
- Periodical Reporting containing information gathered at the different phases of the process for managing operational risks.

Risk Management function also contributes to external risk reporting in relation to:

- Risk report in the Notes of the Financial statement;
- Regulatory reporting to the competent Supervisory Authority and to the Market as far as concerns the risk profile, Additional risk topics included in the financial reporting process.

Internal Audit

As described in chapter B.5.

Compliance function

The appointment of the Compliance Officer is subject to the approval of the Board of Directors, in agreement with the Regional Compliance Officer. The same rule applies for the dismissal of the Compliance Officer.

The organizational structure of Generali Hellas' Compliance Function consisting of 1,5 Full Time Employees is appropriate to mitigate the relevant risks.

The current staff of the Compliance Function has the necessary qualifications (professional certifications) and experience (more than 10 years), in order to carry out their duties effectively. They have the necessary professional and personal skills enabling them to understand the obligations, legislation, standards and rules that impact the business and to be familiar with compliance risk management methodologies. Moreover, the current annual budget is sufficient to mitigate the Compliance related risks.

Adequate safeguards are in place to ensure the separation of tasks and the prevention of conflicts of interest in order to guarantee the Compliance function's independence. The separation of the Compliance function from the other controlling functions and from the operational departments is guaranteed by expressly defining its respective role and scope of activities.

The Compliance Officer reports to the Board of Directors, to the CEO and to the Group Compliance Officer through the Country/Regional Compliance Officer. The Compliance Officer has a matrix-reporting line and a two-tier responsibility: at local level, in order to guarantee the compliance with local rules and other specificities linked to the business practices, organization, etc. and at Group level, being subject to Group guidance and coordination.

Compliance reporting allows the Board of Directors and senior management to obtain a picture of the level of risk faced by the Company for communication, discussion and decision making. It includes, as a minimum, the drafting of the annual Compliance Plan, the Risk Assessment Report and the annual Compliance Report.

Planned activities are set out in a Compliance Plan, which takes into consideration all relevant areas of the entity, its exposure to compliance risk and Group Compliance directives. The activities included in the Plan take into account the existing laws and regulations as well as the emerging ones and potential follow-up activities on the assessments performed in previous years. The Plan is discussed with the Regional Compliance Officer, and then it is presented to the local Board of Directors for approval.

The results of each compliance risk assessment activity carried out following the Compliance Plan are described in detail in the Risk Assessment Report. This report contains all the information about the compliance risk identification and assessment phases and allows management and the Compliance Officer to become aware and discuss the compliance risk identified, so that informed, timely decisions can be made.

The Assessment Report is addressed to the head of the business units impacted and to the senior management.

The Compliance Officer prepares an annual report on the activities carried out by the Compliance function and on the adequacy of the controls put in place by the Company to manage the compliance risk.

The annual report is addressed to the Board of Directors, to the Chief Executive Officer and to the Regional Compliance Officer.

The report contains a description of the activities carried out during the year as per the Compliance Plan as well as any extra plan activities performed following requests by the Board of Directors, the Group Compliance Officer, the Regional Compliance Officer and local Regulatory Authorities.

Actuarial function

(please see section B.6)

B.2. FIT AND PROPER REQUIREMENTS

B.2.1. DESCRIPTION OF SKILLS, KNOWLEDGE AND EXPERTISE REQUIRED FOR PERSONS WHO EFFECTIVELY RUN THE UNDERTAKING OR HAVE OTHER KEY FUNCTIONS

The Solvency II Directive requires that all persons who effectively run the undertaking or have other key functions "at all times fulfil the following requirements:

- their professional qualifications, knowledge and experience are adequate to enable sound and prudent management (fit) and
- they are of good repute and integrity (proper)".

The Company's Fit & Proper Policy, based on the Group Fit & Proper Policy which is applied to all Group Legal Entities, sets out:

- the minimum fit and proper requirements for the personnel effectively running the Company or performing other key functions
- the process for assessing the fitness and propriety of the relevant personnel.

The rules for identifying the personnel requested to meet the fit & proper requirements is described in par. 3 (Relevant Personnel) of the Fit & Proper Policy. The Relevant personnel is:

- Members of the Administrative and Supervisory Bodies
- Members of the Board of Statutory Auditors, if any
- Key Managers
- Personnel of the Control Functions
- Personnel exerting control over certain outsourced activities.

The Relevant personnel must comply with the minimum fitness requirements provided by the Fin & Proper Policy, as well as by local legislation and more restrictive local fit & proper policies, depending on the collective or individual responsibilities they hold.

Moreover, the Relevant personnel are expected to avoid, to the maximum extent possible, activities that could create conflicts of interest or the appearance of conflicts of interest.

The Company shall arrange professional training/education sessions, as necessary, so that the relevant personnel are able to meet the changing and/or increasing requirements set forth by the applicable legislation in relation to their particular responsibilities.

More analytically, the Relevant personnel's Fitness requirements are detailed as follows:

MEMBERS OF THE ADMINISTRATIVE OR SUPERVISORY BODIES

The Administrative Bodies and Supervisory Bodies include, in the one-tier administrative system, the board of directors and, in the two-tier administrative system, the supervisory board, and/or (if applicable) the management board.

The Company applies the one-tier administrative system and has the board of directors as administrative body.

The Administrative Body of the Company shall collectively possess appropriate experience and knowledge about at least:

- the market in which the undertaking operates,
- business strategy and business model,
- system of governance,
- actuarial and financial analysis,
- regulatory framework and requirements.

- **Market knowledge** means an awareness and understanding of the wider relevant business, economic and market environment in which the undertaking operates and an awareness of the level of knowledge of and needs of customers.
- **Business strategy and business model knowledge** refers to a detailed understanding of the undertaking's business strategy and model.

- **System of Governance knowledge** means the awareness and understanding of the risks that the undertaking is facing and the capability to manage them. Furthermore, it includes the ability to assess the effectiveness of the undertaking's arrangements to deliver effective governance, oversight and controls in the business and, if necessary, oversee changes in these areas.
- **Actuarial and Financial analysis knowledge** means the ability to interpret the undertaking's actuarial and financial information, identify and assess key issues, and take any necessary measures (including appropriate controls) based on this information.
- **Regulatory framework and requirements knowledge** means awareness and understanding of the regulatory framework in which the undertaking operates, in terms of both the regulatory requirements and expectations, and the capacity to adapt to changes in the regulatory framework without delay.

MEMBERS OF THE BOARD OF STATUTORY AUDITORS

The Board of statutory auditors includes the board of persons with a control and auditing role, whose appointment is required by applicable legislation or by the by-laws of the Company.

KEY MANAGERS

In general terms, Key Managers could include persons employed by the undertaking who are responsible for high level decision making and implementing the strategies devised and the policies approved by the Administrative and Supervisory Bodies. Key Managers are those managers who effectively run any Group legal entity. Regardless of the title assigned to each correspondent role, these include at least:

- the local CEOs
- the General Managers
- the Chief Financial Officer
- the Chief Insurance Officer
- the Chief Operating Officer
- the Head of HR
- the General Counsel
- the Chief Investment Officer
- the Chief Data Officer.

Each Key Manager must possess the professional qualifications, knowledge and experience which are appropriate and adequate to hold all the roles he/she is in charge of.

PERSONNEL OF THE CONTROL FUNCTIONS

This includes at least the following heads of Control Functions (where established):

- the Head of the Internal Audit function,
- the Head of the Risk Management function,
- the Head of the Compliance function,
- the Head of the Actuarial function.

All the personnel of the control functions must possess the fit and proper requirements provided by the policies governing these functions as described in the respective chapters of this report.

PERSONNEL EXERTING CONTROL OVER CERTAIN OUTSOURCED ACTIVITIES

As a general principle, the persons that are in charge of the control of outsourced activities must possess sufficient professional qualifications, knowledge and expertise to exert control over the outsourced activity. In particular, at a minimum level, the person who has overall responsibility for the outsourced activities has to possess enough knowledge and experience regarding the outsourced function to be able to challenge the performance and the results of the service provider.

B.2.2. PROCESS FOR ASSESSING THE FITNESS AND THE PROPRIETY OF THE PERSONS

In addition to the requirements stated above and in the relevant policies, the Company shall evaluate if the Relevant personnel is "fit" and "proper" to perform the role and responsibilities assigned to them.

FITNESS REQUIREMENTS EVALUATION

MEMBERS OF THE ADMINISTRATIVE OR SUPERVISORY BODIES

The Administrative and Supervisory Bodies of the Company are expected to take collective decisions based on the contribution of each single member. The members are not expected to possess, each of them individually, expert knowledge, competence and experience within all areas of the undertaking. However, the collective knowledge, competence and experience of the Administrative and Supervisory Bodies as a whole have to provide for a sound and prudent management of the undertaking.

Therefore, the fitness of the Administrative and Supervisory Body's members shall be evaluated from both an individual (considering the contribution that each member can give to the collective decision) and collective perspective.

When assessing the knowledge, competence and experience required for the performance of a particular role within the Administrative and Supervisory Bodies, the qualifications and experience of the employees within the undertaking can be also taken into account as a relevant factor.

The evaluation shall demonstrate that the collective knowledge of the body is maintained at an adequate level at all times.

The evaluation of the possession of the fitness requirements shall be executed by the Administrative or Supervisory Body itself:

- in one of the first meetings after their appointment,
- at least once a year,
- whenever a change in the composition of the Administrative or Supervisory Body occurs due to any reason whatsoever (including, without limitation, in the event of replacement of one of the members of the corporate body).

The Company may decide that the supervisory body evaluates the fitness requirements of the members of the Administrative Body.

When a sole director is appointed, the evaluation is performed by the subject (within the Company), who has the power to appoint him/her (in most cases the shareholders).

If appropriate (taking into account the activities carried on by each of them), Group legal entities sharing the same members of the Administrative or Supervisory Body, or the sole director can agree in writing to have the evaluation performed just by one of them.

As a general rule, the Company shall perform the Fit & Proper evaluation within the Administrative and Supervisory Bodies when approving the annual financial statement.

When the candidates are proposed according to the process set out in the Policy on Nomination, Delegated powers and Remuneration, the evaluation is performed also by Assicurazioni Generali before communicating the nomination.

MEMBERS OF THE BOARD OF STATUTORY AUDITORS

The members of the Board of Statutory Auditors (if any) shall comply with the fitness requirements provided by the applicable local legislation.

KEY MANAGERS

The evaluation on the possession by each Key Manager of the fitness requirements shall demonstrate that the qualifications, knowledge and experience of each Key Manager is maintained at an appropriate and adequate level at all times.

The evaluation shall be executed by the subject or the collective body in charge of the appointment of the Key Manager according to the applicable corporate governance rules. Moreover, the HR Department shall request a written self-declaration to confirm their adherence to the current fit & proper standards and their commitment to give immediate notice to the HR Department of any significant events which are relevant in this respect.

PERSONNEL OF THE CONTROL FUNCTIONS

The aim of the fitness evaluation is to demonstrate at all times that the qualifications, knowledge and experience of the Heads of the Control Functions is maintained at an adequate level.

The evaluation of the possession by the Heads of the Company's Control Functions of the fitness requirements shall be executed by the Administrative Body of the Company when appointing the Head of the relevant Control Function and on an ongoing basis (at least on an annual basis).

The evaluation of the personnel shall be executed by the Head of the Control Function. Moreover, the HR Department shall request a written self-declaration as described above.

Where the Control Function is outsourced to a service provider, the possession of fitness requirements by the persons performing the function must be documented.

PERSONNEL EXERTING CONTROL OVER CERTAIN OUTSOURCED ACTIVITIES

The evaluation shall demonstrate that the qualifications, knowledge and experience of the persons exerting control over certain outsourced activities is maintained at an adequate level at all times.

The evaluation shall be executed by the person in charge of the appointment of the persons in charge of the control. Moreover, the HR Department shall request a written self-declaration as described above.

PROPER REQUIREMENTS EVALUATION

The assessment of whether the Relevant personnel are proper should include an assessment of their honesty based on relevant evidence regarding their character, personal behavior and business conduct. Personal reliability and good reputation are prerequisites to be eligible for and hold relevant roles within the Company.

The professional integrity of the Relevant personnel is assessed on the basis of evidence regarding the following:

- Criminal convictions
- Negative assessments by the competent supervisory authorities stating the inadequacy of the person to hold the relevant office
- Serious disciplinary or administrative measures applied as a consequence of willful misconduct or gross negligence, also related to relevant breaches of the Group Code of Conduct and the implementing Group Rules

B.3. RISK MANAGEMENT SYSTEM INCLUDING THE OWN RISK AND SOLVENCY ASSESSMENT

B.3.1. RISK MANAGEMENT SYSTEM

The purpose of the Risk Management system is to ensure that all risks to which the Company is exposed to are properly and effectively managed on the basis of the risk strategy defined, following a set of processes and procedures and based on clear governance provisions.

The principles defining the Risk Management system are provided in the Generali Group Risk Management Policy which is the cornerstone of all risk-related policies and guidelines. The Risk Management Policy covers all risks the Company is exposed to, on a current basis or on forward-looking basis.

Generali Group's Risk Management process is defined on the following phases:

1. Risk Identification

The purpose of the Risk identification phase is to ensure that all material risks to which the Company is exposed to are properly identified. For that purpose, the Risk Management Function interacts with the main Business Functions in order to identify the main risks, assess their importance and ensure that adequate measures are taken to mitigate them according to a sound governance process. Within this process, Emerging Risks are also taken into consideration.

Based on Solvency II risk categories and for the purpose of Solvency Capital Requirement (SCR) calculation, risks are categorized according to the following Risk Map:

Risk Map

Risks covered by Standard Formula				
Financial Risks	**Credit Risks**	**Insurance Risks Non-Life & NSLT Health**	**Insurance Risks Life & SLT Health**	**Operational Risks**
Interest Rate yields	Counterparty Default	Pricing	Mortality CAT	
Equity Price		Reserving	Mortality no CAT	
Property		Non-Life Lapse	Longevity	
Currency		CAT	Morbidity/Disability	
Concentration			Life Lapse	
Spread widening			Expense	
			Health CAT	

The Company has also developed an effective Risk Management system for those risks which are not included in the SCR calculation, such as Liquidity Risk and Other Risks (so called 'non-quantifiable risks', i.e. Reputational Risk, Contagion Risk and Emerging Risks).

Please see sections C.4 Liquidity Risk and C.6 Other Risks.

2. Risk Measurement

The risks identified during this 1st phase are then measured through their contributions to the SCR, eventually complemented by other modelling techniques deemed appropriate and proportionate to better reflect the Company risk profile. Using the same metric for measuring the risks and the SCR ensures that each risk is covered by an adequate amount of Solvency Capital which could absorb the loss incurred if the risk went to materialize.

The Company measures its capital requirement using the EIOPA Standard Formula approach, being fully compliant with Solvency II regulation.

Risks not included in the SCR calculation, such as Liquidity Risk and the Other Risks are evaluated based on quantitative and qualitative techniques and models.

3. Risk Management and Control

As part of Generali Group, the Company operates under a sound Risk Management system in line with the processes and the strategy set by Generali Group. To ensure that the risks are managed according to the risk strategy, the Company follows the governance defined in the Group Risk Appetite Framework (RAF). RAF governance provides a framework for risk management embedding in day-to-day and extraordinary business operations, control mechanisms as well as escalation and reporting processes.

Furthermore, the Company has created the local RAF, the purpose of which is to set the desired level of risk (in terms of Risk Appetite and Risk Preferences) and limit excessive risk-taking. Tolerance Levels on the basis of capital and liquidity metrics are set accordingly. Should an indicator approach or breach the defined Tolerance Levels, escalation mechanisms are then activated.

4. Risk Reporting

Risk monitoring and reporting is a key Risk Management process which allows to maintain Business Functions, Top Management, BoD and also Supervisory Authority aware and informed on the risk profile development, risk trends and breaches of Risk Tolerances.

The Own Risk and Solvency Assessment (ORSA) is the main risk reporting process, coordinated by the Risk Management Function. Its purpose is to provide the assessment of risks and of the overall solvency needs on a current and forward-looking basis. The ORSA process ensures ongoing assessment of the solvency position in line with the Strategic Plan and Capital Management Plan, followed by a regular communication of ORSA Results to the Supervisory Authority after BoD approval. More details are provided in section B.3.2.

5. Risk Governance

The above Risk Management process is ensured by the Risk Management Function, which in compliance with Solvency II and the principles set in the Risk Policies, supports the BoD and Top Management in ensuring the effectiveness of the Risk Management system.

The Risk Management Function is responsible for reporting to the BoD the most significant risks identified and for coordinating the ORSA process. The Risk Management Function has the responsibility to:

- Assist the Administrative, Management or Supervisory Board (AMSB) and other functions in the effective operation of the Risk Management system
- Monitor the Risk Management system and the implementation of the Risk Management Policy
- Monitor the general risk profile of the Company and coordinate the risk reporting, including the reporting in case of tolerances breaches
- Advise AMSB and support main business decision-making processes including those related to strategic affairs such as corporate strategy, mergers and acquisitions and major projects and investments. The responsible of the Risk Management Function reports hierarchically to the Chief Executive Officer (CEO) and functionally to the BoD. To ensure a strong coordination and direction from Head Office he/she also reports to the Group Chief Risk Officer (GCRO).

B.3.2. ORSA PROCESS

The ORSA process is a key component of the Risk Management system which aims at assessing the adequacy of the solvency position and the risk profile on a current and forward-looking basis.

The ORSA process documents and properly assesses the main risks the Company is exposed to, or might be exposed on the basis of its Strategic Plan. It includes the assessment of the risks in scope of the SCR calculation, but also the Other Risks not included in SCR calculation. In terms of risk assessment techniques, stress test and sensitivity analysis are also performed with the purpose to assess the resilience of the Company risk profile to changed market conditions or specific risk factors.

The ORSA Report is produced on an annual basis. In addition to the annual ORSA Report, non-regular ORSA Reports are produced when the risk profile has changed significantly.

All results are properly documented in the ORSA Report and discussed during the Company Risk Committee. After discussion and approval by the BoD, the Report is submitted to the Supervisory Authority. As a general rule, the information included in the ORSA Report is sufficiently detailed in order to ensure that the relevant results can be used in the decision-making process and in the business planning process.

The results of the local ORSA are also reported to the Parent Company as an input to the ORSA process of Generali Group. For this reason, the Company follows the principles set in the Group Risk Management Policy and additional operating procedures. These are issued by Head Office to grant consistency of the ORSA process across the Companies of Generali Group.

B.3.3. RISK EMBEDDING IN CAPITAL MANAGEMENT PROCESS

Capital Management and Risk Management are strongly integrated processes. This integration is deemed essential to ensure alignment between business and risk strategies.

By means of the ORSA process the projection of capital position and the forward-looking risk profile assessment contribute to the Strategic Planning and Capital Management process.

The ORSA Report also leverages on the Capital Management Plan to verify the adequacy, including the quality, of the Eligible Own Funds to cover the overall solvency needs on the basis of the plan assumptions.

To ensure the risk and business strategies on-going alignment, the local strategic planning process requires the involvement of all relevant departments, Finance, Investment, Technical, Actuarial and Risk. The procedure followed is in line with the Group Strategic Planning process.

The Finance department takes into account the most recent Economic and Financial Scenarios, the technical provisions provided by the Actuarial Function and all the required feedback from the Technical and Sales department's and ends up with the Business Plan. The Business Plan is then provided to the Risk department, which produces the forecasted Solvency Capital Requirement using a dedicated Projection Tool provided by the Group. The results are finally submitted for approval to the company's management and BoD.

The Local Strategic Planning Process as exhibited below follows the Strategic Planning Process of the Group.

B.4. INTERNAL CONTROL SYSTEM

B.4.1. INTERNAL CONTROL SYSTEM

The internal control and risk management system of Generali Hellas is founded on the establishment of the three lines of defense:

- the operating functions (the "Risk Owners"), which represent the first line of defense and have ultimate responsibility for risks relating to their area of expertise
- actuarial, compliance and risk management functions, which represent the second line of defense
- internal audit, which represents the third line of defense (together with actuarial, compliance and risk management functions the "Control Functions").

The internal control system ensures Company's compliance with applicable laws, regulations and administrative provisions and the effectiveness and the efficiency of its operations in light of its objectives as well as ensures the availability and reliability of financial and non-financial information.

The Company's risk management system allows risks, including those arising from non-compliance with regulations, to be identified, assessed even on a forward looking basis, managed, monitored and reported. The Own Risk and Solvency Assessment (ORSA) is part of the risk management system.

B.4.2. INFORMATION ON INTERNAL CONTROL FUNCTION: ORGANIZATIONAL STRUCTURE AND THE DECISION MAKING PROCESSES OF THE UNDERTAKING. STATUS AND RESOURCES OF THE INTERNAL CONTROL FUNCTION WITHIN THE UNDERTAKING

Regarding Compliance Function, please see section B.1.4.

B.4.3. INFORMATION ON AUTHORITIES, RESOURCES, PROFESSIONAL QUALIFICATIONS, KNOWLEDGE, EXPERIENCE AND OPERATIONAL INDEPENDENCE OF THE INTERNAL CONTROL FUNCTION

Regarding Compliance Function, please see section B.1.5.

B.5. INTERNAL AUDIT FUNCTION

B.5.1. INFORMATION ON INTERNAL AUDIT FUNCTION: ORGANIZATIONA STRUCTURE, THE DECISION MAKING PROCESSES, STATUS, AUTHORITIES, RESOURCES, PROFESSIONAL QUALIFICATIONS, KNOWLEDGE, EXPERIENCE AND OPERATIONAL INDEPENDENCE OF THE INTERNAL AUDIT FUNCTION

In Generali Hellas, the internal audit activities are performed by Internal Audit Function in line with the organizational rules defined in the Group Audit Policy approved by the Board of Directors of Assicurazioni Generali and by the Board of Directors of Generali Hellas (hereafter “BoD”).

Internal Audit Function of Generali Hellas (hereafter “IAF”) is an independent, effective and objective function established by the BoD to examine and evaluate the adequacy, functioning, effectiveness and efficiency of the internal control system and all other elements of the system of governance, with a view of improving the efficacy and efficiency of the internal control system of the organization and of the governance processes.

It supports the BoD in identifying the strategies and guidelines on internal control and risk management, ensuring they are appropriate and valid over time and provides the Board with analysis, appraisals, recommendations and information concerning the activities reviewed; it also carries out assurance and advisory activities for the benefit of the BoD, the Top Management and other departments.

As provided by the Group Audit Policy, a solid line reporting model is established between the Head of Group Audit in Assicurazioni Generali, the Head of the Business Unit Audit and the Heads of Internal Audit Functions.

Based on this model, the Head of IAF reports to the BoD and ultimately to the Head of Group Audit, through the Heads of the Business Unit Audit.

That ensures autonomy to act and independence from operational management as well as more effective communication flows. This covers the methodologies to be used, the organizational structure to be adopted (recruiting, appointment, dismissal, remuneration and budget in agreement with the BoD), the objectives setting and the year-end appraisal, the reporting methods, as well as the proposed audit activities to be included in the Internal Audit Plan to be submitted to the BoD for approval.

IAF is provided with appropriate budget and resources and its staff possesses the knowledge, skills and competencies required to carry out their work with proficiency and due professional care.

IAF has full, free, unrestricted and timely access to any and all of the organization’s records, physical properties, and personnel pertinent to carry out any engagement, with strict accountability for confidentiality and safeguarding records and information. The Head of IAF has free and unrestricted access to the BoD.

It governs itself by adherence to The Institute of Internal Auditors’ mandatory guidance including the Definition of Internal Auditing, the Code of Ethics, and the International Standards for the Professional Practice of Internal Auditing. Given the delicate and important nature of the assurance role carried out within the business, all the personnel must have specific fit and proper requirements as requested by the Group Fit & Proper Policy approved by the Board of Directors of Assicurazioni Generali.

In particular, the Head of IAF is a person which meets the requirements of the Greek Regulation Authority's Regime and Solvency II Regulation as well as the Generali Group requirements and has extensive relevant experience within areas including audit, control, insurance, risk and compliance.

The Head of IAF shall not assume any responsibility for any other operational function and should have an open, constructive and cooperative relationship with regulators, which supports sharing of information relevant to carry out their respective responsibilities.

All personnel belonging to IAF have skills and a proven track record commensurate with the degree of complexity of the activities to be carried out and must avoid, to the maximum extent possible, activities that could create conflicts of interest or the appearance of conflicts of interest. They behave in an impeccable manner at all times, and information coming to their knowledge when carrying out their tasks and duties must always be kept completely confidential.

The activity of IAF remains free from interference by any element in the organization, including matters of audit selection, scope, procedures, frequency, timing, or report content to permit maintenance of a necessary independent and objective mental attitude.

Internal Auditors do not have direct operational responsibility or authority over any of the activities audited. Accordingly, they are not involved in operational organization of the undertaking or in developing, introducing or implementing organizational or internal control measures. However, the need of impartiality does not exclude the possibility to request from the Internal Audit Function an opinion on specific matters related to the internal control principles to be complied with.

At least annually, the Head of IAF proposes to the Audit Committee of Generali Hellas an internal audit plan before being submitted for the approval of the BoD.

The Plan is developed based on a prioritization of the audit universe using a risk-based methodology, taking into account all the activities, the complete system of governance, the expected developments of activities and innovations and including input of Top management and the BoD. The planning shall take account of any deficiencies found during the audits already made and of any new risk detected.

In each Audit plan submitted by the Head of IAF for the approval of the BoD, timing as well as budget and resource requirements for the next calendar year is included. The Head of IAF communicates the impact of any resource limitations and significant interim changes to the BoD.

This plan is reviewed and adjusted at least on a bi-annual basis in response to changes in the organization's business, risks, operations, programs, systems, controls and findings. Where necessary, IAF may carry out audits which are not included in the Audit Plan or advisory services related to governance, risk management and control as appropriate for the organization.

All audit activities are carried out following a consistent methodology common at Group Level. The scope of auditing encompasses, but is not limited to, the examination and evaluation of the adequacy and effectiveness of the organization's governance, risk management, and internal control processes in relation to the organization's defined goals and objectives.

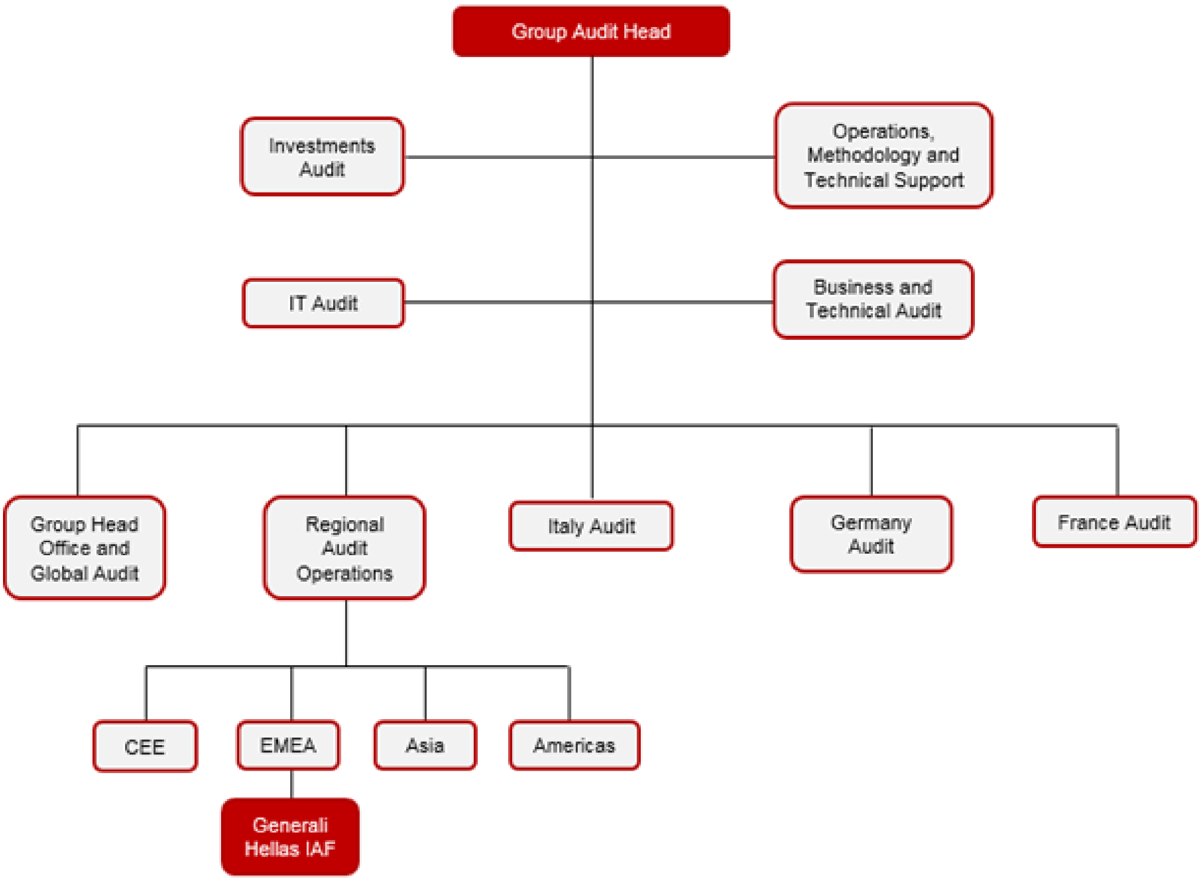
Following the conclusion of each engagement, a written audit report is prepared and issued to the auditee and the auditee's hierarchy. This report, that indicates the significance of the issues found, covers at least any issues regarding the efficiency and suitability of the internal control system, as well as major shortcomings regarding the compliance with internal policies, procedures and processes. It includes the agreed corrective actions taken or to be taken concerning the issues identified and also the agreed deadlines for the implementation of these corrective actions.

IAF is responsible for monitoring appropriate follow-up on issues raised and agreed actions.

The Head of IAF, at least on a bi-annual basis, provides the BoD with a report on activities and significant issues during the period and a proposal of an action plan. The BoD determines what actions are to be taken with respect to each issue and ensure that those actions are carried out. However, in the event of any particularly serious situations the Head of IAF will immediately inform the Audit Committee and the BoD.

IAF maintains a quality assurance and improvement program that covers all aspects of audit activity. The program includes an evaluation of the audit activity's conformance with the Group Audit Manual, the Definition of Internal Auditing and the Standards, and an evaluation of whether internal auditors apply the Code of Ethics. The program also assesses the efficiency and effectiveness of the audit activity and identifies opportunities for improvement.

In terms of organizational structure, IAF is placed as follows:



All these departments act in a coordinated way in order to ensure the fulfillment of the task explained above, following a common audit methodology and in adherence with the principles of the Group Audit Policy.

B.6. ACTUARIAL FUNCTION

The main responsibilities of Generali Hellas Actuarial Function (hereinafter "AF"), as required by the Solvency II principles (article 48 of Directive 2009/138/EC), are the following:

- To coordinate the calculation and validate the technical provisions (hereinafter "TPs")
- To inform the Board of Directors of Generali Hellas (hereinafter "BoD") on the reliability and adequacy of the calculation of the Technical Provisions
- To express an opinion on the overall underwriting policy
- To express an opinion on the adequacy of the reinsurance arrangements
- To contribute to the effective implementation of the risk-management system.

In this context, the company's AF transposes the common TP standard reference framework into the organization.

The Head of Actuarial Function is appointed by the BoD. In the case of Generali Hellas, due to the company's business structure, the Actuarial Function hierarchically reports to the CRO and sits under the CRO area. In addition, to preserve the independence in carrying out his activities, the head of Actuarial Function functionally reports to the Board of Directors, to which he has independent and direct access.

The Actuarial Function organizational structure specifies clearly the reporting lines, allocates functions and responsibilities. In addition, the Actuarial Function operating model takes into account the nature, scale and complexity of the risks inherent in the company's business. To be more specific:

- As far as the operating model is concerned, the model is in line with the model at Group level. In particular, the AF is constituted by the Calculation Unit (five persons) which is an operating unit responsible for the calculation of the Technical Provisions' and the implementation of the Actuarial Function Report, the Validation Unit (three persons) which is a controlling unit responsible for the validation of the TP's and finally the Head of AF which is the fully responsible for the control of the results, the opinion regarding the TP's, Underwriting and Reinsurance, and the process of TP's calculation in general.
- As far as the interactions of the AF with the existing statutory actuarial roles is concerned, all its members are also members of the company's Actuarial Department. In particular, all members of the Validation and Calculation Units are members of the company's Actuarial department.
- As far as the interaction of the AF with other internal functions is concerned, it should be highlighted that there is a very close cooperation especially between the AF and the Risk Management Function. This cooperation has been proved to be very useful for both functions to meet successfully their requirements.

At this point it should be highlighted that there no activities outsourced.

In terms of resources, the Actuarial Function currently consists of nine people. All of them possess an actuarial preparation, with a BSc degree in actuarial sciences, statistics or mathematics, seven of them possess a Master's degree in actuarial science (MSc) and three of them are full members of the Hellenic Actuarial Society.

B.7. OUTSOURCING

B.7.1. INFORMATION ON OUTSOURCING POLICY

Outsourcing is one of the levers that Generali Hellas could apply to optimize costs and commercial effectiveness, while safeguarding the quality of its operations.

Inherently, Outsourcing introduces to reputation and operations risks, that must be properly assessed and managed to ensure that the execution of the Outsourcer matches the standards normally ensured by processes internally executed. The Local Outsourcing Policy (hereinafter the "Policy") provides the principles to be followed on outsourcing initiatives pursuant to Directive 2009/138/EC of the European Parliament and of the Council of 25 November 2009, and relevant implementing measures.

The Policy is intended to set consistent minimum mandatory outsourcing standards at Local level, assign main outsourcing responsibilities and ensure that appropriate controls and governance structures are established within any outsourcing initiative.

The Policy outlines the main principles to be followed when implementing outsourcing.

The Policy introduces a risk-based approach, adopting a proportionality principle to apply requirements according to the risk profile (distinguishing between critical and not critical outsourcing), the materiality of each outsourcing agreement and the extent which Generali Hellas controls the service providers.

The Policy requires the appointment, for each outsourcing agreement, of a specific business referent. The business referent is responsible for the overall execution of the outsourcing lifecycle, from the risk assessment to the final management of the agreement and subsequent monitoring activities of the Service Level Agreements defined in each contract.

At the moment, there are no critical or important activities outsourced.

Main Objectives

The Local Outsourcing Policy (to follow the Policy) is aimed at:

- Setting globally consistent minimum mandatory outsourcing standards;
- Assigning outsourcing responsibilities within Generali Hellas, in its role of Group legal entity Company, and in relation to any outsourcing partner;
- Complying with anticipated Solvency II requirements (in force from 1/1/2016);
- Ensuring that appropriate controls and governance structures are established to monitor and guarantee adequate oversight of outsourced activities.

B.8. ANY OTHER INFORMATION

B.8.1. ASSESSMENT OF THE ADEQUACY OF THEIR SYSTEM OF GOVERNANCE TO THE NATURE, SCALE AND COMPLEXITY OF THE RISKS INHERENT IN THEIR BUSINESS

The Company has assessed its governance system 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.

B.8.2. OTHER MATERIAL INFORMATION REGARDING THE SYSTEM OF GOVERNANCE

There is no other information to report regarding the System of Governance.

C. Risk Profile

C.1. UNDERWRITING RISK

C.1.1. LIFE UNDERWRITING RISK

RISK EXPOSURE AND ASSESSMENT

Life and Health Underwriting Risks include Biometric and Operating Risks embedded in the Life and Health insurance policies. Biometric Risks derive from the uncertainty in the assumptions regarding mortality, longevity, health, morbidity and disability rates taken into account in the insurance liability valuations. Operating Risks derive from the uncertainty regarding the amount of expenses and from the adverse exercise by the policyholders of their contractual options. Along with the premium payment, the lapse of the policy is the most significant contractual option held by the policyholders.

The Life and Health Underwriting Risks identified in the Company's Risk Map are:

- Mortality Risk, defined as the risk of loss, or of adverse change in the value of insurance liabilities, resulting from changes in the mortality rates, where an increase in the mortality rates leads to an increase in the value of insurance liabilities. Mortality Risk include also Mortality Catastrophe Risk, as the risk of loss, or of adverse change in the value of insurance liabilities, resulting from the significant uncertainty of pricing and provisioning assumptions related to extreme or irregular events
- Longevity Risk that, similarly to Mortality, is defined as the risk resulting from changes in the mortality rates, where a decrease in the mortality rate leads to an increase in the value of insurance liabilities;
- Disability and Morbidity Risks are defined as the risk of loss, or of adverse change in the value of insurance liabilities, resulting from changes in the disability, sickness, morbidity and recovery rates
- Lapse Risk is linked to the loss or adverse change in liabilities due to a change in the expected exercise rates of policyholder options. The relevant options are all legal or contractual policyholder rights to fully or partly terminate, surrender, decrease, restrict or suspend insurance cover or permit the insurance policy to lapse. This includes also the catastrophic event on lapse
- Expense Risk, as the risk of loss, or of adverse change in the value of insurance liabilities, resulting from changes in the expenses incurred in servicing insurance or reinsurance contracts
- Health, as the risk of loss, or of adverse change in the value of insurance liabilities, resulting from changes in the Health claims. It includes also Health Catastrophe Risk, as the risk of loss, or of adverse change in the value of insurance liabilities, resulting from the significant uncertainty of pricing and provisioning assumptions related to extreme or irregular events for the Health insurance business.

The Company is exposed to Health Risk due to the products being classified as Health business. Those products cover medical expenses due to illness, accident or disability as well as financial compensation arising from those events. As a result, they have been assigned to life lines of business (i.e. SLT health business) or to non life lines of business (i.e. NSLT business) based on the nature of their liabilities and the identification of the risks which materially affect the underlying cash-flows. In the case of a product being assigned to SLT health business, it is exposed to the biometric risks defined above.

The main Underwriting Risk in the Company's portfolio is Lapse risk, and more precisely the lapse down shock. The Company's Life portfolio has a prevailing component of saving business with high guarantees which is exposed to Lapse Risk. This scenario assumes an instantaneous decrease of the assumed option exercise rates in all future years. The guaranteed rates of portfolio are much higher than the interest rate yields provided by the market and as a consequence, the reduction of the exercise rates creates a capital requirement for the Company.

Life portfolio also includes pure risk covers, with related Mortality Risk, and some annuity portfolios, with the presence of Longevity Risk.

Finally, Expense Risk is present on all the products in portfolio.

The Life Underwriting Risks are measured through a quantitative model aimed at determining the SCR, based on the methodology and parameters defined in the Standard Formula approach.

The risk measurement derives from the application of a pre-defined stress to the best estimate biometric/operating assumptions with a probability of occurrence equal to 0.5%.

For the Mortality and Longevity Risks, the uncertainty in insured population mortality and its impact on the Company is measured applying permanent and catastrophe stresses to the policyholders' death rates.

For the Morbidity and Disability Risks, the uncertainty in insured population sickness or morbidity and its impact on the Company is measured applying permanent or catastrophe stresses to the policyholders' morbidity, disability and recovery rates.

For the Health Risks, the uncertainty in insured population sickness or morbidity that are not captured in the Morbidity and Disability and its impact on the Company is measured applying stresses to the policyholders' claims and to the medical expenses.

In case of Lapse Risk, risk calibration and loss modelling aims at measuring the uncertainty in policyholder behavior with respect to legal or contractual options that give them the rights to fully or partly terminate, surrender, decrease, restrict or suspend insurance cover or permit the insurance policy to lapse. Similarly to Biometric Risks, the measurement is done via the application of permanent and catastrophe stresses to these policyholders' behavior.

Expense Risk is measured through the application of stresses to the amount of expenses and expense inflation that the Company expects to incur in the future.

RISK MANAGEMENT AND MITIGATION

The techniques for mitigating, monitoring and managing the Life Underwriting Risks are based on quantitative and qualitative assessments embedded in the processes that are carefully defined and monitored both at Company's and Generali Group level (such as Life product approval and underwriting limits process).

Risk Mitigation

Robust pricing and ex-ante selection of the risks through underwriting are the main two defenses against Life Underwriting Risks.

Product Pricing

An effective product pricing consists in setting product features and assumptions regarding expenses, biometric, policyholders' behavior assumptions so as to allow the Company to withstand any adverse development in the realization of these assumptions.

For saving business, this is mainly achieved through profit testing, while for protection business involving a biometric component, this is achieved by setting prudent assumptions.

For example, Lapse Risk, related to voluntary withdrawal from the contract, or Expense Risk, related to the uncertainty around the expenses that the Company expects to incur in the future, are evaluated in a prudential manner in the pricing of new products. This evaluation is taken into account in the construction and the profit testing of a new tariff, considering the underlying assumptions derived from the experience of the Company.

For insurance portfolios with a Biometric Risk component, the mortality tables used in the pricing include prudential margins. The standard approach is to use population or experience tables with adequate safety loadings. For these portfolios, comprehensive reviews of the mortality experience are performed at Head Office level, every year, which involve a comparison with the expected mortality of the portfolio, determined according to the most up-to-date mortality tables available in each market. This analysis, that takes into consideration the mortality by sex, age, policy year, sum assured and other underwriting criteria, allows to continuously check the adequacy of the mortality assumptions taken into account in the product pricing and to address the risk of misestimating for the next underwriting years.

Similarly to Mortality Risk, for Longevity Risk, an annual assessment of the adequacy of the mortality tables used in the pricing is performed, that not only considers the Biometric Risks but also the Financial Risks related to the minimum Interest Rate guarantee and any potential mismatch between the liabilities and the corresponding assets. Also in this case, the analysis allows to continuously check the adequacy of the longevity assumptions taken into account in the product pricing and to address the risk of misestimating for the next underwriting years. Should this not be sufficiently reliable or suitable, the experience of the other Companies of the same Country or the general experiences of the local market are used.

Furthermore, to ensure full alignment with Generali's strategy on product approval, the process includes an on-going monitoring of the products to be launched by the Company and a biannual update of the profitability review, done at Parent Company level.

Underwriting Process

The Parent Company issues underwriting guidelines, determines operating limits to be followed by the Company and defines the standard process to request exemptions in order to maintain the risk exposure between the pre-set limits and ensure a coherent use of the capital.

There is a particular emphasis put on the underwriting of new contracts that considers both the Medical, Financial and Moral Hazard Risks. The Group has defined clear underwritings standards through manuals, forms and medical and financial underwriting requirements. The autonomy of the Company in underwriting policies depends on its structure and portfolio and is determined by the Parent Company.

For insurance riders , which are most exposed to moral hazard, maximum insurability levels by the Company are set, lower than those applied for death covers. In order to mitigate these risks, policy exclusions are also defined.

The Company monitors regularly the risk exposures and the adherence to the operative limits, reports any abnormal situation and follows an escalation process proportionate to the nature of the breach in order to ensure that remediation actions are swiftly undertaken.

Role of Risk Management in Pricing and Product Approval Processes

The local CRO supports the pricing process as a member of the local Product & Underwriting Committees.

The product approval process foresees a review by the Risk Management Function that the new products are in line with the Risk Appetite Statement (both in regards to quantitative and qualitative dimensions) and that risk-capital is considered as part of the risk-adjusted performance management.

Underwriting Risk can also be transferred through reinsurance to another (re)insurance undertaking in order to reduce the financial impact of these risks on the Company, and thus reduce the SCR held to cover them.

The Life Reinsurance Function at Group level supports, steers and coordinates the reinsurance activity done by the Company by defining appropriate guidelines aimed at ensuring a tight control of risk, in line with the Group Risk Appetite, and at fully leveraging opportunities that reinsurance offers in each market.

The Parent Company acts as the main reinsurer for the Company. Nevertheless, with the Parent Company's agreement and when justified by specific business reasons, the Company can also transact with another Reinsurance Company on the open reinsurance market.

In subscribing reinsurance contracts with market reinsurers, the Company agrees and relies on the above-mentioned guidelines that indicate also the admissible reinsurance transactions, the relevant maximum allowed cession and the counterparties selection on the basis of their financial strength.

The reinsurance program is subject to the Life Actuarial Function opinion regarding its adequacy in accordance with the Group Actuarial Function Policy and related guidelines.

C.1.2. NON-LIFE UNDERWRITING RISK

RISK EXPOSURE AND ASSESSMENT

P&C Underwriting Risk is the risk arising from P&C insurance obligations, in relation to the perils covered and the processes used in the conduct of business. It includes at least the risk of underestimating the frequency and/or severity of the claims in defining pricing and reserves (respectively Pricing Risk and Reserving Risk) and the risk of losses arising from extreme or exceptional events (Catastrophe Risk).

The Company cannot avoid exposure to potential losses stemming from the risks intrinsically related to the nature of its core businesses. However, properly defining standards and recognizing, measuring, setting limits to these risks is of critical importance to ensure the Company's resilience under adverse circumstances and to align P&C underwriting activities with Generali Risk Appetite.

The Company, in line with Generali Group risk strategy, writes and accepts risks that are known and understood, where the available information and the transparency of exposure enables the businesses to achieve a high level of professional underwriting, with consistent development. Moreover, risks are underwritten with quality standards in the underwriting procedures in order to secure profitability and limit moral hazard.

The exposures of the Company to the underwritten risks are described in the other corresponding sections of the documentation, related to the Technical Provisions and the Market Value Balance Sheet.

The P&C Underwriting Risks are measured through a quantitative model aimed at determining the SCR, based on the methodology and parameters defined in the Standard Formula approach.

The risk measurement derives from the application of a pre-defined stress to the best estimate with a probability of occurrence equal to 0.5%.

Moreover, in addition to capital metrics, the Risk Management Function defines risk indicators, such as relevant exposures, risk concentration and other metrics to monitor on a quarterly basis the development of the P&C Underwriting Risks. This ensures on-going alignment with the Risk Appetite Framework.

The Risk Management Function also checks the appropriateness of the parameters used in the SCR calculation by performing sensitivity analysis.

The region where geographical accumulation is Southern Europe, therefore all the Company's business is allocated to this main geographical segment in order to simplify the calculations.

RISK MANAGEMENT AND MITIGATION

P&C Risk selection starts with an overall proposal in terms of underwriting strategy and corresponding business selection criteria in agreement with Group Head Office. The underwriting strategy is formulated consistently with the Risk Preferences defined by the BoD within the Risk Appetite Framework.

During the Strategic Planning process, targets are established and translated into underwriting limits with the objective to ensure business is underwritten according to the plan. Underwriting limits define the maximum size of risks and classes of business the Company shall be allowed to write without seeking any additional or prior approval. The limits may be set based on value limits, risk type, product exposure or class of occupancy. The purpose of these limits is to attain a coherent and profitable book of business that is founded on the expertise of the Company.

Reinsurance is the key risk mitigation technique for the P&C portfolio. It aims at optimizing the use of risk capital by ceding part of the Underwriting Risk to selected counterparties simultaneously minimizing the Credit Risk associated with such operation.

The Company places the treaty reinsurance to the Head Office though quota share and excess of loss treaties.

The Property Catastrophe Reinsurance Program for 2017 is designed as follows:

- Protection aims to cover single occurrence losses up to a return period of at least 250 years;
- Protection proved capable in all recent major cat losses;
- Substantial risk capital saved by means of the protection;
- An additional aggregate XL program is protecting the Company balance sheet in case of multiple events in a year.

The same level of return period protection and risk capital savings are guaranteed for other Non-Catastrophe protections, i.e. related to single extreme risks in Property, Transportation and Liability Lines of Business.

The Company has historically preferred traditional reinsurance as a tool for mitigating Catastrophe Risk resulting from its P&C portfolio, and has shown no appetite for other mitigating techniques.

Risk Management Function confirms the adequacy of the risk mitigation techniques on annual basis.

C.2. MARKET RISK

C.2.1. RISK EXPOSURE AND ASSESSMENT

As a composite insurer, the Company collects premiums from policyholders in exchange of payment promises contingent on pre-determined events.

The Company invests the collected premiums in a wide variety of financial assets, with the purpose of honoring future promises to policyholders and generating value for its shareholders.

The Company is then exposed to the following Market Risks, that:

- Invested assets do not perform as expected because of falling or volatile market prices;
- Cash of maturing bonds are reinvested at unfavorable market conditions, typically lower interest rates.

Because it holds its assets until they are needed to redeem the promises to policyholders, the Company is quite immune to short-term decrease and fluctuations in the market value of its assets.

Nonetheless, the Company is required by the Solvency II regulation to hold a capital buffer, with the purpose of maintaining a sound solvency position even in the circumstances of adverse market movements. Please refer to section E.2.

For this purpose, the Company manages its investments in a prudent way according to the so-called 'Prudent Person Principle, and strives to optimize the return of its assets while minimizing the negative impact of short term market fluctuations on its solvency.

Each type of business need to be covered by a certain type of investment, based on the complexity, nature and duration of the underlying claims. Below there are some examples on traditional with guarantees life business, Unit-Linked products and non-life business indicating how an efficient asset liability management is accomplished.

TRADITIONAL WITH GUARANTEES LIFE BUSINESS

The Company assumes a considerable Market Risk when it guarantees policyholders with a minimum return of the accumulated capital over a long period of time. If during the contractual period the return generated by the financial investment is below the guaranteed return for a prolonged period of time, the Company shall compensate itself the contractual guarantees. In addition, independently on their realization, the Company has to ensure that the value of the financial investments backing the insurance contracts do not fall below the value of its obligations.

NON-LIFE BUSINESS

The Company invests the premiums collected in financial instruments ensuring that benefits to policyholders can be timely paid. If the value of the financial investments sufficiently decreases at the moment when benefits to policyholders need to be paid, the Company may fail to maintain its promises to policyholders. Therefore, the Company must ensure that the value of the financial investments backing the insurance contracts do not fall below the value of its obligations.

UNIT-LINKED BUSINESS

In the case of Unit-Linked business the Company typically invests the premiums collected in financial instruments but does not bear Market Risk. However, the Company is exposed with respect to its earnings: fees are the main source of profits for the Company and they are directly linked to the performance of the underlying assets, therefore adverse developments of markets directly affect the profitability of the Company, when contract fees become insufficient to cover costs.

More in detail, the Company is exposed to interest rate risk and spread risk since the main investment type is government and corporate bonds and equity risk that arises from investments in mutual funds.

The Market Risks included in the Company's Risk Map are:

- **Equity Risk:** is defined as the risk of adverse changes in the market value of the assets or in the value of liabilities due to changes in the level of equity market prices which can lead to financial losses. Exposure to Equity Risk arises from positions that are sensitive to equity prices, e.g. shares that the Company has invested in or embedded derivatives in a Life product that invests parts of the policyholder assets in equity;

- **Interest Rate Risk:** is defined as the risk of adverse changes in the market value of the assets or in the value of liabilities due to changes in the level of interest rates in the market. The Company is mostly exposed to upward changes in interest rates as higher interest rates decrease the present value of the promises made to policyholders less than the value of the assets backing those promises. As result it may become increasingly expensive for the Company to maintain its promises thereby also leading to financial losses. However, even though the Company is composite and flavored by the diversification of the portfolios, the interest rate calculations are performed separately for life and non life business and it has resulted that life business is more sensitive to IR downward scenario. This means that lower interest rates increase the present value of the promises made to policyholders more than the value of the assets backing those promises;

- **Concentration Risk:** is defined as the risk of incurring in significant financial losses because the asset portfolio is concentrated to a small number of counterparties, thus increasing the possibility that a negative event hitting only a small number or even a single counterparty can produce large losses;

- **Currency Risk:** is defined as the possibility of adverse changes in the market value of the assets or the value of liabilities due to changes in exchange rates. Exposure to Currency Risk arises from direct or indirect asset or liability positions that are sensitive to changes in exchange rates;

- **Property Risk:** is then defined as the possibility of adverse changes in the market value of the assets or the value of liabilities due to changes in the level of property market prices. Exposure to Property Risk arises from property asset positions.

- **Spread Widening Risk:** is defined as the risk of adverse changes in the market value of the assets due to changes in the level or in the volatility of credit spreads over the risk-free interest rate term structure. The market value of an asset can decrease because of spread widening risk either because the market's assessment of the creditworthiness of the specific obligor decreases, which is typically accompanied by a credit rating downgrade, or because there is a market-wide systemic reduction in the price of credit assets;

Common risk measurement methodologies (both qualitative and quantitative) are applied in order to provide an integrated measurement of the risks borne by the Company.

For the evaluation of its Market Risks, the Company makes use of the EIOPA Standard Formula, as ruled by the Solvency II Directive, complemented by additional measurement techniques deemed appropriate and proportionate.

Based on this methodology, the breakdown of the SCR originating from Market Risks, which can be seen in Section E indicates that the highest risk is spread risk arising from the investment in corporate bonds.

Market Risk concentration is explicitly modelled by the Standard Formula model. Based on the results of the model and on the composition of the balance sheet the Company has no material risk concentrations.

C.2.2. RISK MANAGEMENT AND MITIGATION

The Market Risks borne by the Company are managed in many different ways.

The 'Prudent Person Principle' is the main cornerstone of the Company investment management process. To ensure a comprehensive management of Market Risks impacts on assets and liabilities, the Company Strategic Asset Allocation (SAA) process needs to be liability-driven and strongly inter-dependent with insurance-specific targets and constraints. The Company, following the Generali Group approach, has integrated Strategic Asset Allocation (SAA) and Asset Liability Management (ALM) within the same process.

One of the main risk mitigation techniques used by the Company consists in liability driven management of the assets, which aims at granting a comprehensive management of assets taking into account the Company liabilities structure. Interest Rate and Currency Risk are for example mitigated when to a movement observed on the asset side would correspond an offsetting movement on the liability side of the balance sheet.

The asset portfolio is invested and rebalanced according to the asset class and duration weights defined through the Investment Management process described above and based on the 'Prudent Person Principle'. The aim is not just to eliminate the risk but to define an optimal risk-return profile satisfying the return target and the Risk Appetite of the Company over the Business Planning period.

ALM&SAA activities aim at ensuring that the Company holds sufficient and adequate assets in order to reach defined targets and meet liability obligations. This implies detailed analyses of asset-liability relationship under a range of market scenarios and expected/stressed investment conditions.

The ALM&SAA process relies on a close interaction between Investment, Finance, Actuarial and Risk Management Functions. The inputs and targets received from the above-mentioned Functions guarantee that the ALM&SAA process is consistent with the Risk Appetite Framework, Strategic Planning and Capital Allocation processes.

The aim of the Strategic Asset Allocation process is to define the most efficient combination of asset classes which, according to 'Prudent Person Principle' set out in the Solvency II Directive and related relevant implementation measures, maximizes the investment contribution to value creation, taking into account solvency, actuarial and accounting indicators.

The annual SAA proposal:

- Defines target exposure and limits, in term of minimum and maximum exposure allowed, for each relevant asset class
- Embeds the deliberate ALM mismatches permitted and potential mitigation actions that can be enabled on the investment side.

The Company invests in fixed income securities and mutual funds in order to cover its liabilities and does not implement any other strategies, such as options or special purpose vehicles (SPVs) to hedge its exposures.

In addition to risk tolerance limits set on the Company solvency position defined within the RAF, the current risk monitoring process of the Company is also integrated by the application of the Generali Group Risk Guidelines (GRG) provided by Head Office.

The GRG include general principles, quantitative risk limits (with a strong focus on credit and market concentration), authorization processes and prohibitions.

C.3. CREDIT RISK

C.3.1. RISK EXPOSURE AND ASSESSMENT

The Credit Risk presented in the Company's Risk Map is the counterparty default risk, which is defined as the risk of incurring in losses because of the inability of a counterparty to honor its financial obligations, ie. the default risk arising from the default of counterparties in cash deposits, risk mitigation contracts (including reinsurance), and other type of exposures subject to credit risk.

For the evaluation of its Credit Risks, the Company makes use of the EIOPA Standard Formula, as ruled by the Solvency II Directive, complemented by additional measurement techniques deemed appropriate and proportionate.

Based on this methodology, the breakdown of the SCR originating from Credit Risks, which can be seen in section E indicates that type 2 exposures create the higher capital requirement of credit risk. Type 2 exposures are classified to receivables from Intermediaries due for more and less than 3 months. More precise analysis can be found in section E.

C.3.2. RISK MANAGEMENT AND MITIGATION

The Credit Risks borne by the Company are managed in many concurrent ways.

In order to eliminate its exposure in counterparty default risk, the Company has managed to reduce the credit period of the intermediaries in the Corporate policies. This has led to a significant capital relief coming mainly from receivables due to more than three months. Moreover, given that cash at Banks are stressed in the counterparty default risk, the choice of high rated banks has reduced the capital requirement coming from type 1 exposures.

The Company hasn't implemented any other strategies to hedge or eliminate the risk neither holds any credits assets, put options or derivatives used for hedging purposes.

C.4. LIQUIDITY RISK

C.4.1. RISK EXPOSURE AND ASSESSMENT

Liquidity Risk is defined as the uncertainty, emanating from business operations, investment or financing activities, over the ability of the insurer to meet payment obligations in a full and timely manner, in a current or stressed environment. This could include meeting commitments only through a credit market access at unfavourable conditions or through the sale of financial assets incurring in additional costs due to illiquidity of (or difficulties in liquidating) the assets.

The Company is exposed to Liquidity Risk as a result of insurance operating activity, depending on the cash-flow profile of the expected new business, due to the potential mismatches between the cash inflows and the cash outflows deriving from the business. Liquidity Risk can additionally stem from investing activity, due to potential liquidity gaps deriving from the management of the Company's assets portfolio as well as from a potentially insufficient level of liquidity (i.e. capacity of being sold at a fair price in adequate amounts and within a reasonable timeframe) in case of disposal. Finally, the Company can be exposed to liquidity outflows related to issued guarantees, commitments, derivative contract margin calls, or regulatory constraints regarding Insurance Provisions Coverage Ratio and capital position.

Generali's Liquidity Risk Management relies on projecting cash obligations and available cash resources into the future, so as to monitor that available liquid resources are at all times sufficient to cover the cash obligations that will come due in the same period.

Generali has defined a set of Liquidity Risk Metrics that are used to regularly monitor the liquidity situation of each Group insurance company. All such metrics are forward-looking, i.e. they are calculated at a future date based on projections of cash-flows, assets and liabilities and an estimation of the level of liquidity of the asset portfolio. The ratios are aimed at measuring the ability of the Company to ensure the fulfilment of its regulatory Technical Reserves Coverage Requirement as well as its cash obligations towards customers and other stakeholders. The metrics that are being monitor refer to the:

- Technical Reserves Coverage Ratio (TRC), which measures the ability of the Company to ensure compliance with the regulatory coverage of technical reserves at the end of the indicator time horizon, defined in the Group liquidity risk limit monitoring guideline.
- Liquidity Gap Ratio (LGR), which measures the ability of the Company to cope with the cash obligations that are expected to come due during the indicator time horizon, defined in the Group liquidity risk limit monitoring guideline.
- Investments Liquidability Ratio (ILR), which measures the coverage of technical reserves by sellable assets at the end of the indicator time horizon, defined in the Group liquidity risk limit monitoring guideline.

The metrics are calculated both under the so-called 'base scenario', in which the values of cash-flows, assets and liabilities correspond to those projected according to the Company's Strategic Plan scenario, and under a set of so-called 'stress scenarios', in which the projected cash inflows and outflows, market price of assets and amount of Technical Reserves are recalculated to take into account unlikely but plausible circumstances that would adversely impact the Company's liquidity.

In case of any breach of the above ratios, an escalation process is activated, providing an analysis of drivers and reasons that caused the breach, a forward-looking assessment of the legal entity's liquidity situation, and an explanation of the initiatives that have been or being taken to ensure that the Company will not incur liquidity issues.

Liquidity Risk limits have been defined by Group Head Office in terms of values of the above-mentioned metrics that the Company cannot exceed. The limit framework is designed so as to ensure that the Company holds a 'buffer' of liquidity in excess of the amount required to withstand the adverse circumstances depicted in the stress scenarios.

More specifically each Group Company has to be compliant with the values of the liquidity risk tolerance limits that are defined for each liquidity metric in the Group Liquidity risk limit monitoring guideline. Generali Group has set soft and hard liquidity tolerance limits, for all legal entities, dividing them by business sector (life and non-life liquidity tolerance limits),

According to the forecast of the year 2017 performed in November 2016, the liquidity risk tolerance limits distribute in the life portfolio:

- An increase in the investments liquidability ratio against the ratio of the previous year (2016) for all defined scenarios, which concludes to the fact that the Company increased its capability to cover the life technical reserves with more sellable assets at the end of the indicator time horizon.
- A decrease in the Liquidity Gap Ratio against the ratio of the previous year (2016) for all defined scenarios, which concludes to the fact that the Company increased its capability to cope with the cash obligations related to life portfolio that are expected to come due during the indicator time horizon.
- An increase in the technical reserves coverage ratio against the ratio of the previous year (2016) for all defined scenarios, which ensures a greater compliance with the regulatory coverage of the life technical reserves at the end of the indicator time horizon.

According to the forecast of the year 2017 performed in November 2016, the liquidity risk tolerance limits distribute in the non-life portfolio:

- A significant increase in the investments liquidability ratio against the ratio of the previous year for all defined scenarios, which concludes to the fact that the Company increased its capability to cover the non-life technical reserves with more sellable assets at the end of the indicator time horizon.
- A significant decrease in the Liquidity Gap Ratio against the ratio of the previous year for all defined scenarios, which concludes to the fact that the Company increased its capability to cope with the cash obligations related to the non-life portfolio that are expected to come due during the indicator time horizon.
- An increase in the technical reserves coverage ratio against the ratio of the previous year for all defined scenarios, which ensures a greater compliance with the regulatory coverage of the non-life technical reserves at the end of the indicator time horizon.

C.4.2. RISK MANAGEMENT AND MITIGATION

The Company manages and mitigates Liquidity Risk in consistency with the framework set in the Group internal regulations. The Company aims at ensuring the capacity to meet its commitments also in case of adverse scenarios, while achieving its profitability and growth objectives. To that end, it manages expected cash inflows and outflows so as to maintain a sufficient available cash level to meet the short and medium term needs and by investing in instruments that can be quickly and easily converted into cash with minimum capital losses. The Company considers the prospect liquidity situation in plausible market conditions as well as under stressed scenarios. The Company has established clear governance for Liquidity Risk measurement, management, mitigation and reporting in consistency with Group regulations, including the setting of specific limits and escalation process in case of limits breach or other liquidity issues.

The Company's BOD, CEO and Risk Committee, or equivalent bodies are ultimately responsible for ensuring a solid and stable liquidity position of the Local entity according to the local system of Governance.

The CFO area is responsible for monitoring and managing the Entity's liquidity risk position while also monitoring and reporting on the short-term and medium-term liquidity position ensuring that any possible liquidity gap is prevented or effectively managed.

The Chief Financial officer area Chief Insurance officer area, are responsible to provide any relevant information to the CFO and CRO and support the Local CFO in this task for the respective areas of accountability. The CRO monitors liquidity risk limits; assesses and reports on the liquidity as described in the Company's Liquidity Risk management Policy. Additionally, the CRO based on the reporting package produced by the CFO area, provides also assessment on the overall liquidity position within ORSA report, as detailed by related ORSA principles and ORSA guidelines. ORSA report is provided twice a year to Group Risk Management, including a dedicated section on the liquidity risk. Moreover, the Mains Risks self-assessment as part of the ORSA report, includes the assessment of the main vulnerabilities also in consideration of the liquidity dimension.

Moreover, a dedicated committee is in charge so as to discuss the implementation of necessary investment management actions and to proceed to immediate actions in case of any liquidity issue comes up. More specifically the Local Investment Committee undertakes the following responsibilities:

- Approves as required by local regulatory frameworks, the investments decisions proposed by Group Investment Manager-Head Office
- Discusses and reviews the Strategic Asset Allocation proposed by the local investment management (LIM), under the supervision of GIM-HO
- Approves the investment mandates to be awarded to Group Asset Management and third party asset managers, as proposed by the Local Investment manager under the supervision of Group Investment Manager-Head Office.
- Approves illiquid and alternative investments above certain thresholds, to the extent that they are not in scope of asset management mandates awarded by the Group Insurance Company in scope to Group Asset Managers or third party Asset Managers. In such cases the approval should be coordinated with the Group Alternative investments function within GIM-HO.
- Supervises the investment outsourcing controlling activities reported by the local CRO.
- Supervises the execution of any investment-related tasks and procedures specifically required by the local regulation.

The principles for Liquidity Risk Management designed in the Group Risk Appetite Framework are fully embedded in the Strategic Planning as well as in business processes including investments and product development. As far as the investment process is concerned, Generali has explicitly identified Liquidity Risk as one of the main risks connected with investments and has stipulated that the Strategic Asset Allocation process must rely on indicators strictly related to Liquidity Risk, including the mismatch of duration and cash-flows between assets and liabilities. Investment limits have been imposed to the Company in order to ensure that the share of illiquid assets is kept within a level that does not impair the Company's asset liquidity. As far as product development is concerned, the Group has defined in its Life and P&C Underwriting Policies the principles to be applied to mitigate the impact on liquidity from lapses and surrenders in respect of the Life business and claims in respect of Non-Life business.

C.4.3. EXPECTED PROFIT INCLUDED IN FUTURE PREMIUMS

The Expected Profit Included in Future Premiums (EPIFP) represents the expected present value of future cash-flows which result from the inclusion in Technical Provisions of premiums relating to existing insurance and reinsurance contracts. These are expected to be received in the future, but that may not be received for any reason, other than because the insured event has occurred, regardless of the legal or contractual rights of the policyholder to discontinue the Policy.

The amount of EPIFP for the Life business written by the Company has been calculated in accordance with article 260(2) of the Delegated Acts and amounts to € 6.1 mln at year-end 2016.

The company does not include expected profit in its non-life portfolio future premiums.

C.5. OPERATIONAL RISK

C.5.1. RISK EXPOSURE AND ASSESSMENT

Operational Risk is the risk of loss arising from inadequate or failed internal processes, personnel or systems, or from external events. Compliance and Financial Reporting Risks fall within this category.

In line with the industry practices, Generali adopts the following classification categories:

- Internal fraud defined as the losses due to acts of a type intended to defraud, misappropriate property or circumvent regulations, the law or Company Policy, excluding diversity/discrimination events, which involves at least one internal party
- External fraud defined as the losses due to acts of a type intended to defraud, misappropriate property or circumvent the law, by a third party
- Employment Practices and Workplace Safety defined as the losses arising from acts inconsistent with employment, health or safety laws or agreements, from payment of personal injury claims, or from diversity/discrimination events
- Clients, Products and Business Practices defined as the losses arising from an unintentional or negligent failure to meet a professional obligation to specific clients (including fiduciary and suitability requirements), or from the nature or design of a product
- Damage to Physical Assets defined as the losses arising from loss or damage to physical assets from natural disaster or other events
- Business disruption and system failures defined as the losses arising from disruption of business or system failures
- Execution, Delivery and Process Management defined as the losses from failed transaction processing or process management, from relations with trade counterparties and vendors.

Following best industry practices, Generali's framework for Operational Risk Management includes as main activities the Loss Data Collection (LDC), risk assessment and scenario analysis.

The Loss Data Collection is the process of collection of losses suffered as result of the occurrence of Operational Risk event and provides a backward-looking view of the historical losses suffered due to Operational Risk events The process allows the identification, measurement, monitoring, reporting and management of occurred operational risk events.

Generali Group exchanges internal loss data in an anonymized way through the 'Operational Risk data eXchange Association (ORX)', a global association of Operational Risk practitioners and with the participation of the main industry players. The aim is to use the data from the peers to learn from their loss experiences, improving the internal controls and anticipating emerging losses.

Risk assessment and scenarios analysis provide a forward-looking view on the risks that expose Generali and require an analysis of the risks performed jointly with the business owners.

Risk assessment provides a high-level evaluation of the forward-looking inherent and residual risk exposure of each relevant Company and, as a consequence, of the Group. The outcomes of the assessment drive the execution of the scenario analysis; Since Operational Risk and Compliance Risk shall be in a complete alignment, the Risk assessment involves both functions, so as to define a common risk taxonomy. The Risk Assessment is an enhancement of the former Top Down Risk Assessment, separately performed in the previous years by Compliance and OpRisk. A significant part of the exercise consists in the data collection that can provide useful information on how the company manages its risks.

The Risk Assessment is being maintained and renewed for the relevant risks any time a significant event may change the risk profile of each company, or at least yearly.

The risk assessment process is divided in three main phases:

- Pre-assessment, performed by second line of defense functions to obtain a fact based first view on residual risk Exposure.
- Assessment Phase
- Validation Phase

Scenario analysis is a recurring process that, considering the risk assessment results, provides a detailed evaluation of the Group Operational Risk exposure through the selection and the evaluation of specific risk scenarios As stated above, the Risk assessment results, are used as an input for the execution of scenario Analysis activities, providing a forward-looking view on the risks that expose Generali. Scenario Analysis (SA) is the recurring process of obtaining expert opinion to identify and evaluate major potential Operational risk events and assess their potential outcomes, ensuring a forward-looking risk perception. The SA process represents one of the components of the measurement phase included in the Operational Risk Management framework, as described in the "Group Operational Risk Management Methodological Guidelines". The SA process is founded on one single process for risk evaluation, which includes the following phases:

- Planning of SA campaign, which mainly consists of the identification of the Companies to be included in the assessment scope
- Scenario Selection and Set up, which includes activities aimed at identifying the most relevant Risk scenarios to be assessed, plus the development of a local plan and training for the participating Risk Owners by Local ORM;
- Scenarios Evaluation, performed during dedicated Workshops
- Coherence Analysis, that relies on the execution of quality controls performed over SA results, which are finally aggregated at Local/Group level and validated
- Local CRO Validation of SA results for each LE in scope, whose estimations are included in the OpRisk model, according to the IM scope
- Reporting and Sign-off of overall results coming from the process execution at both Local and Group level;
- Follow up, which translates into a monitoring activity upon the activation of controls and mitigation actions reported and identified and the summary of SA lessons learnt and the improvement areas identified.

MAIN COMPANY RISKS

Scenario Analysis 2016 activity

During the Scenario analysis 2016 activity, the Risk Owners of the Company, were asked through dedicated interviews (since the Risk Assessment tool was not yet introduced to the Group), to decide which scenarios the Company is most exposed to, considering already implemented mitigation actions and related internal historical losses. Moreover, in order to conclude to the 5 most critical scenarios for the Company, (as the SA has been implemented in pilot for the year 2016 and only 5 out of ten scenarios were assessed), the Operational Risk scenarios selected and assessed through 2016 are the following:

- Primary building(s) unavailable due to natural catastrophe or fire
- Fraud by clients
- Failure to comply with laws/ regulations concerning portfolio management"
- Service disruption after cyber attack
- Relationship management with intermediaries and/ or sales network

Risk Assessment 2017 (executed in November 2016)

Following the introduce of the Risk Assessment tool in October 2016, all legal entities of the Group gained a more precise approach concerning their exposure to specific risks. Considering potential risk exposure indicators, while also control system indicators, the residual risk exposure of the Company is reflected in the below risks:

- Errors / default in relationship management with intermediaries and/or sales network
- Failure to comply with laws/ regulations concerning portfolio management
- Errors or significant delays in processing operations
- Incorrect data entry/ transfer
- Flaws in product development and design
- Failure to comply with laws/ regulations concerning tax avoidance and evasion
- Failure to comply with laws/ regulations concerning customer data privacy
- Loss of key staff
- IT attack with loss or alteration of data
- Fraud by clients/ third parties

- Failure to comply with laws/ regulations concerning money laundering
- Failure to comply with laws/ regulations concerning distribution

As per Group level (which is considered as a benchmark to execute the local Scenario Analysis activities), the highest risk exposure is concentrated in the following risks:

- IT attack with loss/alteration of data
- Failure to comply with laws/ regulations concerning distribution (Mis-selling)
- Flaws in product development
- Unavailability of IT infrastructure
- Errors in Tax calculation
- Fraud by agents
- Fraud by clients/third parties
- Failure to comply with laws/ regulations concerning money laundering
- Failures in relationship mgmt. with outsourcers/providers

Scenario Analysis 2017 activities

The operational risk scenarios that are going to be selected for the 2017 scenario analysis activities, are going to be based in the results of 2017 risk assessment, taking also into account the results of the Group, main senior management suggestions and possible mitigation actions that have been already implemented to mitigate specific risks. It is worth mentioning that for the 2017 scenario analysis activities, the Company is going to assess 10 operational risk scenarios, which is the Group's minimum requirement for the exercise.

Loss Data Collections

There are no public losses to report.

C.5.2. RISK MANAGEMENT AND MITIGATION

Inputs from Risk Identification and Measurement Processes

The risk identification and measurement processes are preliminary and necessary steps for an adequate management of operational risks. They allow to identify relevant operational events, understand their potential/actual impact and evaluate the potential gaps. Furthermore, the outcomes of risk assessments include Risk Owners expectations and opinions regarding which causes are related to the operational events.

This information is key element for the operational risk management action.

Management Actions

The operational risk management refers to the choice of mitigating, transferring or retaining the operational risk according to the defined risk strategy. In particular the choice consists of:

- mitigating the risks and consequently decreasing the exposure to risk by the implementation of mitigation actions
- transferring the risks, according to an acceptable cost/benefits perspective; it may include the use of traditional insurance mitigation actions in order to transfer the risk to another entity as well as other forms of risk transfer;
- retaining the risks, considering a conscious acceptance of risk exposure linked to the activities of the Group business, consistent with the Risk Preference.

Responsibilities

Due to the nature of operational risks, essentially unavoidable because, differently from other type of risks, they are not assumed but are an inevitable part of doing business, all resources facing with company's processes and systems are in charge of the direct management of operational risks, consistently with their roles and responsibilities. For this purpose, it is fundamental the awareness of operational risks in the daily decision-making processes.

- Particular role, accordingly with the Internal Control and Risk Management System, is assigned to the Risk Owner, defined as the manager of one or more operating areas, responsible for the management of the operational risk and for the implementation of the necessary mitigating actions.
- Risk Management function cooperates with the experts from Human Resources, Organization and Process Control, and ICT functions to guarantee the development of adequate Guidelines and tools to effectively manage the operational risk.
- Coordination and monitoring of operational risk management activities within the Company is ensured by the Risk Management function.

Monitoring

The monitoring of operational risks within Generali Hellas is implemented through an on-going process which involves, on the basis of the respective levels of responsibility, the managers of operational units (Risk Owners), the Top Management, the Risk Management function, the Compliance function and the Internal Audit function.

The monitoring of the evolution of the operational risk profile within the Company and the compliance with principles stated by the Policies and Guidelines is ensured by the Risk Management function.

Any major operational risk failure, identified and assessed (also through the monitoring of key risk indicators), that needs to be immediately managed is reported as soon as identified and an appropriate management action will be triggered.

C.5.3. OTHER MATERIAL RISK

To provide a comprehensive view on the Company risk profile, in addition to the risks defined in sections from C.1 to C.5, the following risks are assessed as significant:

- **Low interest Rate Scenario:** Due to the European low interest levels, the Company may be exposed to a significant financial risk, affecting its Operating result.
- **Adverse Market condition changes Scenario:** Due to the fact that the new financial environment has modified the needs and the standards of the local insurance market, provoking changes in the insurance market and leading to the adaptation of new procedures for the whole industry.
- **Regulatory Complexity:** The continuous updating of the existing regulations, while also the issuance of the new ones, bring new requirements which should be adopted internally by the Company so as to ensure compliance with all regulatory requirements. The non-compliance with the existing and the new regulatory requirements, can expose the Company to a fine imposition.
- **Cyber Risk:** Cyber risk is an increasing threat in all European Countries. The increase of the number of affected companies, while also the continuous change in digitalization and hacker evolution, enhance the possibility of a cyber risk event. The main impact of the attack may involve Customers reimbursement, legal expenses, remediation costs, Professional/ outsourcing fees, Cost of cyber-attack exploitation, while also sanctions and regulatory fines.

As part of the qualitative Risk Management framework, also the following risk categories are considered:

Emerging Risks

Emerging Risks arising from new trends or risks difficult to perceive and quantify, although typically systemic. These usually include internal or external environment changes, social trends, regulatory developments, technological achievements, etc. For the assessment of these risks, the Company relies on the information set provided by Head Office and ensures a proper discussion with all main Business Functions

Emerging risks can be considered, assessed and reported by using a 'PESTLE' analysis. PESTLE analysis areas is described according to the following areas:

- Political
- Economic
- Social
- Technological
- Legal
- Environmental

as according to the best market practices.

According to the above method, Generali Hellas assess potential emerging risks across six key macro and micro economic themes. The output of the PESTLE assessment forms a key driver for the business strategy, planning and decision making process.

Reputational Risk

Reputational Risk is referring to potential losses arising from deterioration or a negative perception of the Company or among its customers, counterparties and Supervisory Authority. The processes that the Company has in place in order to manage this risk are:

- Communication and media monitoring activities
- Customers & distribution networks management
- Compliance monitoring

C.5.4. ANY OTHER INFORMATION

To test the Company solvency position resilience to adverse market conditions or shocks a set of stress test and scenario analyses are performed. These are defined considering unexpected, potentially severe, but plausible events. The outcome, in terms of impact on financial and capital position, prepares the Company to take appropriate management actions if such events were to materialize.

The sensitivity analysis considers simple changes in specific risk drivers (e.g. Interest Rates, equity shock and credit spreads). Their main purpose is to measure the variability of the Own Funds and Solvency Ratio to variations in specific risk factors. The set chosen aims to provide the assessment of resilience to the most significant risks.

In order to verify the adequacy of solvency capital position to the changing of the market conditions, following main sensitivity analyses have been performed:

Risk Free Rate: interest rate change	+/-50 bps
Credit spread of corporate bonds on Swap	+100 bps
Equity Price fair value change	+/-20%
Risk Free rate with No Volatility adjustment	
Ultimate Forward rates	-50 bps

The impacts of the above sensitivities on the Solvency Ratio are reported in section E.

D. Valuation for Solvency Purposes

As far as Assets and Other liabilities units are concerned (resp. D1 and D3), it is worthwhile mentioning that the general framework of both disclosures is based on the SII regulatory framework that standardizes valuations and measurements of MVBS assets and liabilities, largely referring to and in conformity with IFRS principles adopted by the European Commission.

For the sake of clarity, common relevant regulatory reference and disclosure notes have been described both in Assets and Other liabilities, while specific regulatory statements to be applied only on asset or other liability items have been disclosed in the appropriate valuation and measurement section of sub-chapter D.1. and D.3.

In chapter D.5 ‘any other information’, detailed information on legislative and methodological definition of Eligible Own funds are given, recalled then in section E, where numerical info are reported.

In order to define the MVBS at Solo level, all assets and liabilities on the balance sheet must be stated at fair value in accordance with Art 75 of Directive 2009/138/EC (L1 – Dir).

The primary objective for valuation as set out in Article 75 of L1 - Dir requires an economic, market-consistent approach to the valuation of assets and liabilities. According to the approach of Solvency II, when valuing balance sheet items on an economic basis, undertakings need to consider the risks that arise from a particular balance sheet item, using assumptions that market participants would use in valuing the same asset or liability.

This approach leads insurance and reinsurance undertakings to value assets and liabilities at the amount for which they could be exchanged between knowledgeable willing parties in an arm's length transaction; in addition, in case of liabilities valuation, parties shouldn’t make any adjustment to take account of the change of the own credit standing of the insurance or reinsurance undertaking occurred from the recognition of the liability to the valuation date.

According to the Commission delegated regulation (L2-DR) insurance and reinsurance undertakings shall value assets, unless otherwise clearly stated in the regulation, in conformity with:

- international accounting standards adopted by the Commission in accordance with Regulation (EC) No 1606/2002 provided that those standards include valuation methods that are consistent with the valuation approach set out in Article 75 of Directive 2009/138/EC.If those standards allow for the use of more than one valuation method, insurance and reinsurance undertakings shall only use valuation methods that are consistent with Article 75 of Directive 2009/138/EC
- other valuation methods that are deemed to be consistent with Article 75 of Directive 2009/138/EC, when the valuation methods included in international accounting standards adopted by the Commission in accordance with Regulation (EC) No 1606/2002 are either temporarily or permanently not consistent with the valuation approach set out in Article 75 of Directive 2009/138/EC.

By way of derogation from points above #1 and #2, insurance and reinsurance undertakings may value an asset or a liability using an alternative valuation method which is proportionate to the nature, scale and complexity of the risks inherent in the business of the undertaking, provided that:

- the valuation method is:
    - ✓ consistent with Article 75 of Directive 2009/138/EC and
    - ✓ proportionate with respect to the nature, scale and complexity inherent in the business of the undertaking
- the undertaking does not value that asset or liability using international accounting standards adopted by the Commission in accordance with Regulation (EC) No 1606/2002 in its financial statements
- valuing assets and liability using international accounting standards would impose costs on the undertaking that would be disproportionate with respect to the total administrative expenses.

The IFRSs’ accounting bases, such as the definitions of assets and liability and the recognition / derecognition criteria, are applicable as the default accounting framework, unless otherwise stated. IFRSs also refer to a few basic presumptions, which are equally applicable:

- going concern assumption.
- individual assets and liability are valued separately.

- the application of materiality, whereby the omissions or misstatements of items are material if they could, individually or collectively, influence the economic decisions that users make on the basis of the Solvency II balance sheet. Materiality depends on the size and nature of the omission or misstatement judged in the surrounding circumstances. The size or nature of the item, or a combination of both, could be the determining factor.

Fair value hierarchy

In Tech Spec (V6) it is clearly indicated the fair value hierarchy to be adopted in valuating assets and other liabilities than technical provision. On this basis, the undertaking applied the following hierarchy of high level principles for valuation of assets and liabilities:

- use of quoted market prices in active markets for the same assets and liability
- where the use of quoted market prices for the same assets or liability is not possible, use of quoted market prices in active markets for similar assets or liability with adjustments to reflect differences
- if there are no quoted market prices in active markets available, use of mark-to-model techniques. Those alternative valuation techniques have to be benchmarked, extrapolated or otherwise calculated as far as possible from a market input
- maximum use of relevant observable inputs and market inputs is recommended, while use of undertaking-specific inputs and unobservable inputs should be minimize
- valuing liabilities at IFRS fair value, the adjustment to take account of the own credit standing as required by IFRS 13 Fair Value Measurement has to be eliminated. In addition, when valuing financial liabilities subsequently after initial recognition, the adjustment to take account of the own credit standing as required by IFRS 13 Fair Value Measurement and as defined by IFRS 7 Financial Instruments: Disclosures, has to be eliminated.

The definition of fair value in IFRS 13 is based on an 'exit price' notion and uses a 'fair value hierarchy', which results in a market-based, rather than entity-specific, measurement. Being basic concept from IFRS13 imported into SII environment, inputs used in valuation techniques are classified into three levels, giving the highest priority to (unadjusted) quoted prices in active markets for identical asset or liabilities and the lowest priority to unobservable inputs.

Level 1 Inputs

Level 1 inputs are quoted prices in active markets for identical assets or liabilities that the entity can access at the measurement date.

A quoted market price in an active market provides the most reliable evidence of fair value and is used without adjustment to measure fair value whenever available, with limited exceptions.

If an entity holds a position in a single asset or liability and the asset or liability is traded in an active market, the fair value of the asset or liability is measured within Level 1 as the product of the quoted price for the individual asset or liability and the quantity held by the entity, even if the market's normal daily trading volume is not sufficient to absorb the quantity held and placing orders to sell the position in a single transaction might affect the quoted price.

Level 2 Inputs

Level 2 inputs are inputs other than quoted market prices included within Level 1 that are observable for the asset or the liability, either directly or indirectly.

They include:

- quoted prices for similar assets or liabilities in active markets
- quoted prices for identical or similar assets or liability in markets that are not active
- inputs other than quoted prices that are observable for the asset or liability, for example:
  - ✓ interest rates and yield curves observable at commonly quoted intervals
  - ✓ implied volatilities
  - ✓ credit spreads
- inputs that are derived principally from or corroborated by observable market data by correlation or other means ('market-corroborated inputs').

Level 3 Inputs

Level 3 inputs are unobservable inputs for the asset.

Unobservable inputs are used to measure fair value to the extent that relevant observable inputs are not available, thereby allowing for situations in which there is little, if any, market activity for the asset or liability at the measurement date. An entity develops unobservable inputs using the best information available in the circumstances, which might include the entity's own data, taking into account all information about market participant assumptions that is reasonably available.

Fair Value Measurement Approach

The objective of a fair value measurement is to estimate the price at which an orderly transaction to sell the asset or to transfer the liability would take place between market participants at the measurement date under current market conditions.

A fair value measurement requires an entity to determine all of the following:

- the particular asset or liability that is the subject of the measurement (consistently with its unit of account);
- for a non-financial asset, the valuation premise that is appropriate for the measurement (consistently with its highest and best use);
- the principal (or most advantageous) market for the asset or for the liability;
- the valuation technique(s) appropriate for the measurement, considering the availability of data with which to develop inputs that represent the assumptions that market participants would use when pricing the asset or the liability and the level of the fair value hierarchy within which the inputs are categorized.

Guidance on Measurement

IFRS 13 provides the guidance on the measurement of fair value, including the following:

- an entity takes into account the characteristics of the asset or the liability being measured that a market participant would consider when pricing the asset or the liability at measurement date (e.g. the condition and location of the asset and any restrictions on the sale and use of the asset);
- fair value measurement assumes an orderly transaction between market participants at the measurement date under current market conditions;
- fair value measurement assumes a transaction taking place in the principal market for the asset or the liability, or in the absence of a principal market, the most advantageous market for the asset or the liability;
- a fair value measurement of a non-financial asset takes into account its highest and best use;
- a fair value measurement of a financial or non-financial liability or an entity's own equity instruments assumes it is transferred to a market participant at the measurement date, without settlement, extinguishment, or cancellation at the measurement date;
- the fair value of a liability reflects non-performance risk (the risk the entity will not fulfil an obligation), including an entity's own credit risk and assuming the same non-performance risk before and after the transfer of the liability;
- an optional exception applies for certain financial assets with offsetting positions in market risks or counterparty credit risk, provided conditions are met (additional disclosure is required).

Valuation Techniques

An entity uses valuation techniques appropriate in the circumstances and for which sufficient data are available to measure fair value, maximizing the use of relevant observable inputs and minimizing the use of unobservable inputs.

The objective of using a valuation technique is to estimate the price at which an orderly transaction to sell the asset would take place between market participants and the measurement date under current market conditions. Three used valuation techniques are:

- market approach – uses prices and other relevant information generated by market transactions involving identical or comparable (similar) assets/liability or a group of assets/liabilities (e.g. a business);
- cost approach – reflects the amount that would be required currently to replace the service capacity of an asset (current replacement cost);

- income approach – converts future amounts (cash flows or income and expenses) to a single current (discounted) amount, reflecting current market expectations about those future amounts.

In some cases, a single valuation technique will be appropriate, whereas in others multiple valuation techniques will be appropriate.

SII legislation clearly states the similarity of the approach, with particular regards to Article 10 L2-DR Valuation methodology – valuation hierarchy.

D.1. ASSETS

D.1.1. VALUATION OF ASSETS FOR SOLVENCY II BALANCE SHEET

Exclusion of IFRS Valuation Methods

In this chapter, an overall description of the SII valuation methods for Assets is given, complementary to the general Valuation for Solvency Purposes (paragraph D - introduction).

L2-DR, in accepting valuation methods defined in IFRS, anticipates that there are cases where IFRS valuation methods are not consistent with article 75 requirements.

Despite the valuation principles described in previous paragraph D1, specific balance sheet items have to be treated differently form relevant IFRS principle or valuation methods have been excluded from SII environment.

L2-DR states the exclusion of specific valuation methods such as cost or amortized cost and models where value is determined at the lower of the carrying amount and fair value less costs to sell.

Furthermore, other valuation methods usually applied for specific assets are to be excluded in SII environment or are to be adjusted:

- properties, investment properties, plant and equipment shall not be valued at cost less depreciation and impairment
- net realizable value for inventories shall be adjusted by the estimated cost of completion and the estimated costs necessary to make the sale if these costs are material
- lease assets shall be valued at fair value. More in detail, for the purpose of determining the present value of the minimum lease payments market consistent inputs shall be used and no subsequent adjustments to take account of the own credit standing of the undertaking shall be made. Valuation at depreciated cost permitted shall not be applied
- non-monetary grants shall not be valued at nominal amount
- value of biological assets is adjusted by adding the estimated cost to sell (if the estimated costs to sell are material).

SII SPECIFICITIES

L2-DR specifies the treatment of the assets listed below, for which a valuation different from IAS/IFRS measurement is required:

- goodwill and intangible assets;
- deferred taxes.

All points are analyzed in the next dedicated sections.

Goodwill and intangible assets

According to L2-DR Article 12 (Valuation methods for goodwill and intangible assets), insurance and reinsurance undertakings shall value at zero goodwill, deferred acquisition costs and intangible assets other than goodwill, unless the intangible asset can be sold separately and the insurance and reinsurance undertaking can demonstrate that there is a quoted market price for the same or similar assets. Computer software tailored to the needs of the undertaking and "off the shelf" software licenses that cannot be sold to another user shall be valued at zero.

In the Tech Spec (V1.4) it is mentioned the possibility to use the revaluation model10 defined in IAS 38, being in consistency with Article 75 of Directive 2009/138/EC for the intangible items recognized in the Solvency II balance sheet.

Deferred taxes

Although recalling the IAS 12 principles in the current SII regulatory framework, in order to avoid any possible misunderstanding about IAS 12 interpretation and application, SII legislation clarifies explicitly that all the reference amounts on which determination of deferred taxes is based on should be calculated in accordance with SII valuation instead of IFRS rules.

Mutatis mutandis the IFRS assessment with SII valuation of assets and liabilities, IAS 12 is fully applicable for SII regulations.

D.1.2. MVBS – DETAILS ON ASSETS OTHER THAN REINSURANCE RECOVERABLES

In the below table, there is a proposal of qualitative and quantitative description of balance sheet assets, as required by regulation.

Any qualitative information should refer to Local GAAP statutory balance sheet, consequently the suggested notes should be interpreted as hints of the description

amounts in thousand	Solvency II value (a)	Statutory accounts value (b)	Change to SII value (a-b)	Notes
Deferred acquisition costs	0	16.164	-16.164	
Intangible assets		496	-496	For SII purposes, only intangible asset that can be sold separately should be recognized in MVBS (insurance and reinsurance undertaking should demonstrate that there is a quoted market price for the same or similar assets), while computer software tailored to the needs of the undertaking and “off the shelf” software licenses that cannot be sold to another user are valued at zero. All in all, the amount of intangible assets for the group MVBS is negligible and relates mainly to purchased software
Deferred tax assets	0	6.296	-6.296	SII data are based on the difference between the SII value of assets and liabilities and the value for tax purposes on a item by item basis, using the expected tax rate to be applied when assets (liabilities) are realized (settled) and considering potential impact of any announcement of amendment to tax rate. Discount of DTA is not allowed. Carrying amount of deferred tax assets is reviewed at each balance sheet date (recovery test based on estimation of future taxable profits).
Property, plant & equipment held for own use	6.805	6.805	0	Real estates are recognized at IAS/IFRS under the revaluation method and no difference is recognized between SII value IFRS fair value
Investments (other than assets held for index-linked and unit-linked contracts)	**311.782**	**306.115**	**5.666**	
Equities	**0**	**0**	**0**	
Equities - listed	0	0	0	No difference between statutory accounts and SII value (both of them recognized at fair value)
Equities - unlisted	0	0	0	
Bonds	**305.223**	**299.557**	**5.666**	

Government Bonds	173.237	167.574	5.662	Change to SII value due to the different accounting approach: part of bond portfolio is recognized at IAS/IFRS amortized cost for statutory accounts (ifrs categories loans and held to maturity), while the whole SII value is recognized at IFRS fair value. Corporate bonds include reverse REPO and subordinated bond assets
Corporate Bonds	131.987	131.983	4	
Collective Investments Undertakings	5.558	5.558	0	No difference between statutory accounts and SII value (both of them recognized at fair value). The item includes also hedge funds
Deposits other than cash equivalents	1.000	1.000	0	Generally, no relevant change to SII value moving from statutory to MVBS accounts due to close duration and maturity
Assets held for index-linked and unit-linked contracts	25.301	25.301	0	No difference between statutory accounts and SII value (both of them recognized at fair value)
Loans and mortgages	**3.859**	**3.859**	**0**	
Loans on policies	188	188	0	Change to SII value due to the different accounting approach: loans are recognized at IAS/IFRS amortized cost for statutory accounts, while SII value recognized at IFRS fair value
Loans and mortgages to individuals	219	219	0	
Other loans and mortgages	3.452	3.452	0	
Insurance and intermediaries receivables	22.770	22.770	0	No relevant change to SII value moving from statutory to MVBS accounts due to close duration and maturity and to the absence of expected interest cash-flows. As general assumptions, we expect that ifrs amortized cost could be equal to the SII value
Reinsurance receivables	16.533	16.533	0	
Receivables (trade, not insurance)	12.953	12.953	0	
Cash and cash equivalents	27.783	27.783	0	Generally, no relevant change to SII value moving from statutory to MVBS accounts due to close duration and maturity
Any other assets, not elsewhere shown	589	589	0	Residual class of asset items, included prepaid interests, deferrals and other accrued income. Generally, no relevant change to SII value moving from statutory to MVBS accounts due to close duration and maturity
Total assets	**428.374**	**445.664**	**-17.290**	

In the following of this sub-chapter, relevant information about some identified asset class is provided that are explicitly required by regulation.

Intangible asset

If undertakings value intangible assets on the Solvency II balance sheet at an amount other than zero, they should disclose at least:

- The nature of the assets; and
- Information on the evidence and criteria they have used to conclude that an active market exists for those assets exists.

Deferred tax assets information

The Undertaking shall give the following info in relation to deferred taxes assets:

- The amount of deferred tax assets and the nature of the evidence supporting its recognition
- The amount and expiry date if applicable, of deductible temporary differences, unused tax losses and unused tax credits for which no deferred tax asset is recognized in the Solvency II balance sheet.

A description of the closing process for providing Solvency II figures should be given.

Solvency II regulatory framework states that in the MVBS deferred tax assets, representing the amounts of income taxes recoverable in future periods, shall be recognized in respect of:

- deductible temporary differences
- the carry-forward of unused tax losses and
- the carry-forward of unused tax credits

and determined on the basis of the difference between the values ascribed to assets and liabilities (recognized and valued in accordance with Articles 75-86 of L1 -Dir) and the values ascribed to assets and liabilities as recognized and valued for tax purposes.

Undertakings ascribe a positive value to deferred tax assets when it is probable that future taxable profit will be available against which the deferred tax asset can be utilized, taking into account any legal or regulatory requirements on the time limits relating to the carry-forward of unused tax losses or the carry-forward of unused tax credits.

Furthermore, IAS 12 provides that the enterprise shall recognize a deferred tax asset with respect to the carry forward of unused tax losses and tax credits to the extent that it is probable that future taxable profit will be available against which the unused tax losses and unused tax credits can be utilized. In evaluating the probability that future taxable profits will be realized against which unused tax losses and unused tax credits can be utilized, IAS 12 points out that the existence of unused tax losses is strong evidence that future taxable profit may not be available. Therefore, when a group entity has a history of recent losses, the entity recognizes a deferred tax asset arising from unused tax losses or tax credits only to the extent that the entity has sufficient taxable temporary differences or there is convincing other evidence that sufficient taxable profit will be available against which the unused tax losses or unused tax credits can be utilized by the entity.

While a DTL can be recognized in the balance sheet without further justification, the recognition of a DTA is subject to a recoverability test, which aims at showing that sufficient profits will be available in the future to absorb the tax credit, since a DTA can only be recognized “to the extent that it is probable that future taxable profit will be available against which the DTA can be utilized”. Therefore, it is necessary to. In case the deferred taxes after shock (= initial deferred taxes + adjustment) result in a situation of DTA, a recoverability test will be needed to verify if the whole tax can be recognized. In order to test this recoverability, it is necessary not only to take into account any sources of future profits, including the ones which are not already recognized in the balance sheet, but also “any legal or regulatory requirements on the time limits relating to the carry forward of unused tax losses / credits”.

D.2. TECHNICAL PROVISIONS

D.2.1. LIFE TECHNICAL PROVISIONS

OVERVIEW OF LIFE TECHNICAL PROVISIONS

The Solvency II Life Technical Provisions at the end of 2016 have been calculated according to articles 77 to 83 of the Solvency II Directive 2009/138/EC.

The following table shows the amount of Life TP at the end of 2016, split by main components: the best estimate of liabilities, the reinsurance recoverables net of the counterparty default adjustment and the Risk Margin.

(€ thousand)	Amount
BEL Gross of Reinsurance	161.547
Recoverables from Reinsurance (before CDA)	-9.668
Counterparty Default Adjustment (CDA)	293
BEL Net of Reinsurance	**152.172**
Risk Margin (regulatory view)	5.239
TP Net of Reinsurance	**157.411**

The best estimate of liabilities corresponds to the average of the present values of expected future cash flows generated from contracts present in the company portfolio, and therefore include both a probabilistic assessment of their occurrence and an assessment of the time value of money, obtained on the basis of the risk-free interest rates as at 31.12.2016, as observed in the market and officially communicated by EIOPA. This curve (derived, for the main markets, from interbank swap rates) includes both an adjustment to consider the residual default risk of these instruments (the so-called "credit risk adjustment", amounting for Euro to -10bps) and an adjustment to consider the excess return achieved in a risk-free manner by the assets covering the insurance liabilities (the so-called "volatility adjustment", equal to +13bps in the Euro area).

The method used to derive the best estimate of liabilities is based on a direct approach that involves the projection and discounting of all future expected incoming and outgoing cash flows for the duration of the policyholder's liabilities, in line with the contractual limits defined by regulations (contract boundaries). In particular, the projections consider all future premiums and all outflows associated with both the occurrence of insured events (e.g. claims and capital payable in case of survival of the insured when the contract expires) and the possible exercise of contractual options (for example surrender or paid-up options).

Depending on the type of portfolio and risk inherent in them, the expected future cash flows have been assessed in a deterministic scenario (i.e. "Certainty equivalent" scenario) or as the mean value of a set of sensitivity scenarios, to allow the calculation of the cost of financial guarantees.

The best estimate of liabilities of a residual part of the portfolio (relating mainly to group saving business without any guarantee) were evaluated using a simplified approach and assumed equal to the IFRS reserves.

As shown in the above table, the best estimate of liabilities gross of reinsurance amounted to 161,5 Euro millions, which refers to company's direct business.

A part of 6% of gross BEL is transferred via reinsurance inside the Group, and the reinsurance recoverables net of the counterparty default adjustment related to these contracts amounted to 152 Euro millions. The reinsurance recoverables were evaluated by means of appropriate projections of cash flows expected from reinsurance contracts and they were adjusted using the counterparty default adjustment to take account of the risk of default of the reinsurer.

The risk margin represents an allowance to take account of the inevitable uncertainty linked to the volatility of the operating assumptions and inherent in future cash flows. The risk margin is calculated by means of a cost of capital approach which considers the cost associated with the non-hedgeable risks.

The capital requirement needed to cover the non-hedgeable risk was determined using the standard formula approach. The rate used to determine the cost of capital is 6% per annum. The cost of capital of each projection year was discounted at the valuation date using the term structure of interest rates, without the volatility adjustment. In line with the regulation, the risk margin is calculated net of reinsurance. The future projection of the capital requirement needed to cover the non-hedgeable risks and its allocation by business lines was carried out by means of suitable risk drivers applied to the capital required in respect of each risk included in the calculation of risk margin.

At 31 December 2016, the risk margin associated with Generali Hellas insurance contracts is equal to 5,2 Euro millions.

In conclusion, the total value of the Solvency II Life Technical Provisions of Generali Hellas at 31 December 2016, calculated as the sum of the best estimate of liabilities net of reinsurance and risk margin, amounted to 157,4 Euro millions.

The following table reports the amount of the Solvency II Life Technical Provisions split by lines of business.

(€ thousand)	Statutory reserves net of reinsurance	Best Estimate Net of Reinsurance	Risk Margin Regulatory view	Technical Provisions Net of reinsurance
TOTAL	**166.679**	**152.172**	**5.239**	**157.411**
Life Total	**146.745**	**137.530**	**4.663**	**142.193**
LIFE Direct	**146.745**	**137.530**	**4.663**	**142.193**
Insurance with profit participation	116.629	111.726	3.590	115.316
UL - Contracts without options and guarantees	24.654	23.372	1.061	24.433
UL - Contracts with options and guarantees	0	0	0	0
Other - Contracts without options and guarantees	5.462	2.432	11	2.444
Other - Contracts with options and guarantees	0	0	0	0
Annuities stemming from non-life obligations	0	0	0	0
LIFE Accepted	**0**	**0**	**0**	**0**
Accepted reinsurance with profit participation	0	0	0	0
Accepted reinsurance UL contracts	0	0	0	0
Accepted reinsurance Other contract	0	0	0	0
Accepted reinsurance Annuities stemming from non-life obligations	0	0	0	0
SLT HEALTH - total	**19.934**	**14.642**	**576**	**15.219**
SLT HEALTH - Direct	**19.934**	**14.642**	**576**	**15.219**
SLT HEALTH - with options and guarantees	0	0	0	0
SLT HEALTH - without options and guarantees	19.934	14.642	576	15.219
SLT HEALTH - Annuities stemming from non-life obligations	0	0	0	0
SLT HEALTH - Accepted reinsurance	**0**	**0**	**0**	**0**

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Life Technical Provisions net of reinsurance mainly consists of traditional life products (75%), unit linked products (15%) and health life business (10%).

The following table compares the technical provisions reported in the financial statements with the Solvency II Life Technical Provisions at the end of 2016.

(€ thousand)	IFRS	Solvency II	Delta
Gross reserves / BEL Gross	169.487	161.547	7.939
Ceded Reserves / Reinsurance Recoverables	-2.808	-9.375	6.567
Risk Margin (regulatory view)	0	5.239	-5.239
TP Net of Reinsurance	**166.679**	**157.411**	**9.268**

The difference between the statutory reserves (IFRS accounting standard) and Solvency II Life Technical Provisions is due to the inclusion of Deferred Acquisition Cost (DAC) under the IFRS basis and the fact that the calculation of Liability Adequacy Test (LAT) has been based on a local term structure which reflects the actual asset portfolio of the company.

The Solvency II assessment, in fact, considers the future cash flows projected taking account of best estimate assumptions, future profit sharing (financial and technical) and the financial cost of the guarantees, using as the discount rate the current structure of interest rates.

The evaluation of the technical liabilities in the statutory balance sheet is consisted by two components:

- the mathematical policy reserves (including DAC) using the assessments of the technical provisions calculated in accordance with local accounting principles and thus generally uses demographic pricing assumptions, discounts the contractual flows at the technical rate defined at the issue of the contract and, in general, does not consider any future financial profit share on unrealized gains / losses in force at the valuation date.
- The LAT component (where applicable) which is the difference (positive only) between the mathematical policy reserves (excluding DAC) and the portfolio valuation considering the future cash flows projected taking account of best estimate assumptions, future profit sharing (financial and technical) and the financial cost of the guarantees, using as the discount rate the local term structure which reflects the actual asset portfolio of the company.

  The main differences between the cash flow approach and the mathematical policy reserves calculation are attributable to the following items:

- Cash flows resulting from premiums, futures expenses and contractual options:
  - ✓ Premiums: mathematical reserves are usually calculated using pure premiums (i.e. loadings are excluded from the calculation); conversely, in cash flow valuation, all premiums collected are considered
  - ✓ Expenses: typically, future costs are excluded from the assessment of mathematical reserves or, depending on the type of product, they are measured indirectly by means of the provision of loadings collected in the past (management reserves); on the contrary the Cash flow valuation includes the best estimate of the present value of the costs that will be incurred by the company to fulfil all the contractual obligations
  - ✓ contractual options: typically, the calculation of mathematical reserves does not consider the probability of exercise by the insured of contractual options such surrenders or failure to pay premiums; conversely, these elements are appropriately considered in Cash flow valuation.
- Operating assumptions: the reserves reported in the statutory financial statements are generally valued using conservative operating assumptions (or first order), and the technical reserves of Cash flow approach are valued using best estimate assumptions (or second order).
- Economic assumptions: in the cash flow valuation technical provisions are valued using the current economic framework both in terms of interest rate curves and market values of backing assets. In practice, this impacts:
  - ✓ projected economic returns and, consequently, future policyholder bonuses included in future cash flows
  - ✓ interest rates used for discounting.

On the contrary, mathematical reserves typically do not consider future policyholder bonuses and are discounted by means of technical interest rates defined at the inception of the contract.

In addition to the above the Solvency II Life Technical Provisions include the following components, which are not considered in the statutory reserves (IFRS accounting standard):

- Counterparty Default Adjustment: the amount of reinsurance recoverables of cash flow approach is adjusted to consider the probability of default of the counterparty, unlike the mathematical reserves calculation.
- Risk Margin: unlike the statutory reserves calculation, Solvency II includes an explicit assessment of the amount to be held against the non-hedgeable risks.

SOURCES OF UNCERTAINTY

The evaluation of the Solvency II Life Technical Provisions depends not only on the methods, models, and data used, but also on the assumptions on a number of economic and operational factors whose future realizations might differ from the expectations at the valuation date.

The underwriting parameters impact only slightly the Generali Hellas portfolio. In particular, the most relevant operating factor (under the current economic environment – low yield environment) is the surrender rate (lapse down) mainly driven by the traditional portfolio with guarantees.

On the other hand, the impact on the best estimate of liabilities resulting from possible changes regarding the economic environment is reported in the dedicated section E of this document.

LONG-TERM GUARANTEE MEASURES (VOLATILITY ADJUSTMENT, MATCHING ADJUSTMENT AND TRANSITIONAL MEASURES)

The valuation of the best estimate of liabilities has been performed using the volatility adjustment (as referred to in Article 77d of the Directive 2014/51/EU) provided by EIOPA for EURO currency and equal to 13bps at year end 2016. A change to zero of the volatility adjustment would correspond to an increase of 1,2 Euro millions in the Life Technical Provisions of Assicurazioni Generali.

The matching adjustment (as referred to in Article 77b of the Directive 2014/51/EU) has not been applied.

The transitional measure on the risk-free interest rate-term structure (as referred to Article 308c of the Directive 2014/51/EU) and the transitional measure on technical provisions (as referred to in Article 308d of the Directive 2014/51/EU) have not been used.

Link with QRTs for public disclosure: S.02.01.02, S.12.01.02, S.22.01.21

D.2.2. P&C TECHNICAL PROVISIONS

OVERVIEW OF P&C TECHNICAL PROVISIONS

The P&C Technical Provisions, both related to:

- outstanding claims, whether reported or not, occurred before the evaluation date whose costs and related expenses have not been completely paid by that date (Outstanding Claims Reserve)
- future claims of contracts that are either in force at the valuation date or for which a legal obligation exists to provide coverage (Premiums Reserve),

are calculated as the sum of the Discounted Best Estimate of Liabilities (BEL) and the Risk Margin (RM)

$$TP = BEL + RM$$

The Discounted Best Estimate of Liabilities (BEL) is calculated applying the methods and assumptions that are briefly described in the following, separately for Outstanding Claims Reserve and Premiums Reserve.

Outstanding Claims Reserve

The approach to derive the BEL for the Outstanding Claims Reserve depends on the possibility to apply the actuarial methods.

- The BEL of the Unmodeled and Semi-Modelled Business (the line of business or the part of a line of business that, due to different reasons such as, for example, lack of adequate, appropriate and complete data or inhomogeneity of the business herein included, has not been analyzed with the actuarial methods) has been calculated using the IFRS figures.
- The BEL of the Modelled Business (the business which, thanks to the availability of adequate, appropriate and complete data, has been analyzed in detail by means of actuarial methods) has been assessed through the following steps:

Claims and Grouping

In order to perform an appropriate actuarial analysis of the Technical Provisions and to carry out the projections to ultimate cost, historical claims data on a paid and incurred basis (gross of Contractual and Facultative Reinsurance) have been taken into account. Development data used for these purposes fulfil appropriate quality attributes of proportionality, materiality and completeness.

Each portfolio is selected in order to identify homogeneous groups of risks, type of coverage and other specificities, such as the length and the variability of the claims run-off. The minimum level of granularity adopted considers the split between types (direct business, proportional accepted business, non-proportional accepted business) and, in each category, identifies twelve Lines of Business (Workers compensation; Medical expense; Income protection; Motor vehicle liability; Other motor; Marine, aviation and transport; Fire and other damage to property; General liability; Credit and suretyship; Legal expenses; Assistance; Miscellaneous financial loss).

Where possible, the claims have been split depending on their size into attritional, large and extremely large claims and the analysis has been performed separately for each claims type.

Expenses

The reserve for expenses directly arising from a particular compensation case (Allocated Loss Adjustment Expenses (ALAE)) is calculated apportioning the payments related to these expenses directly to each claim and performing the projection on the total payments triangle.

The reserve for expenses not directly arising from a particular compensation case constitutes the reserve for Unallocated Loss Adjustment Expenses (ULAE). These payments are related to the whole package of services offered by an Insurance Company and do not have an automatic association with a specific claim. The approach used to derive the ULAE reserve, is the projection of the number of claims and then multiplied by the average ULAE per claim.

Inflation

The historical data on claims paid and outstanding include the outcomes of the observed inflation, in its two components exogenous and endogenous. If there is an important change across the years, the impact of exogenous inflation, reflecting possible increasing or decreasing of Consumers Prices, and the impact endogenous inflation, which is influenced by the macroeconomic and legislative framework, is taken into account when projecting the future payments.

Actuarial Methods

The actuarial methods used for projecting the experienced history of claims and reserves are the ones implemented in the Group Reserving Tool (ResQ) and described in the GHO methodology paper. In particular, the following methods could be considered:

- Link Ratio Methods on Paid (or Development Factor Models - DFM) are a generalization of the Chain Ladder Method, based on the analysis of the cumulative payments along the years. This class of methods is based on the hypothesis that the settlement process is stable across the origin periods.
- Link Ratio Methods on Incurred technically work as the previous ones but are based on incurred developments, i.e. the sum of cumulative paid and outstanding amounts.
- Bornhuetter-Ferguson Methods on Paid or Incurred combine the projected ultimate (obtained for example by means of a Development Factor Method) with an alternative (a priori) value, using a weighted credibility approach.
- Average Cost per Claim Method on Paid can be performed using one of the previously described models on paid amounts plus a separated projection on claim numbers in the situation of both amounts and number of claims being available (not applied for the YE2016 valuation).

The analysis is done using more than one of the methods listed above in order to confirm the results.

In case of annuities stemming from P&C contracts, the best estimate assessment is performed separately for annuities in payment (i.e. RBNS – Reported But Not Settled - Annuities), treated with Life techniques, and for the annuities which could emerge in the future from non-annuity claims (i.e. IBNR – Incurred But Not Reported – Annuities). The BEL for the IBNR Annuities is assessed using frequency/severity approach, whenever possible, and with a lump-sum approach, whenever the IBNR annuities are not material. It should be highlighted that no annuities stemming from P&C contracts are included in Company's P&C portfolio.

To obtain the final UBEL, all excluded or separately evaluated items (e.g. extremely large claims, un-/semi-modelled parts, expenses) are added to the ultimate claims cost.

Net Evaluation

For each homogeneous group of risks, the UBEL net of reinsurance is calculated adopting the following simplified approach:

$$\mathrm{UBEL}_{\mathrm{net}}^{\mathrm{OC}} = \mathrm{UBEL}_{\mathrm{gross}}^{\mathrm{OC}} \cdot \%\mathrm{NG}$$

where %NG indicates the percentage of IFRS Net Outstanding Claims Reserve on IFRS Gross Outstanding Claims Reserve.

The valuation of the Best Estimate net of reinsurance is performed taking into account an adjustment for the expected losses due to default of the reinsurance counterparties (Counterparty Default Risk Adjustment).

Premiums Reserve

For the contracts with already written premiums, the UBEL of the Premium Reserves is defined as the sum of the following two components (considering gross and net inputs to obtain gross and net results):

- Claims related component: the amount of the Unearned Premium Reserves derived from IFRS is multiplied by a specific measure of current year Loss Ratio, aiming to take out the effect of the adequacy of the estimated UBEL of the Outstanding Claims Reserve (OCR).
- Administration expenses related component: the amount of the Unearned Premium Reserves derived from IFRS is multiplied by a specific measure of the Administration Expense Ratio, to represent the expected part due to expenses stemming from existing contracts.

For un-incepted (instalments included) and multi-year contracts, the UBEL of the Premium Reserve is defined as the sum of the following cash flows:

- Cash in-flows arising from future premiums
- Cash out-flows arising from future claims, net of salvage and subrogation
- Cash out-flows arising from allocated and unallocated claims administration expenses in respect of claims occurring after the valuation date as well as costs arising from on-going administration of in-force policies and acquisition costs insofar related to the considered portfolio.

It should be highlighted that no un-incepted (instalments included) and multi-year contracts are considered in YE2016 evaluation.

Similarly to the Outstanding Claims Reserve, also the net Premiums Reserve is adjusted to take into account the default risk of the counterparties.

Discounting

The Discounted Best Estimate of Liabilities (BEL), both related to Outstanding Claims Reserve and Premiums Reserve, is derived by discounting the expected future payments of the UBEL by the reference basic risk free rate curve.

Risk Margin

The Risk Margin is added to the BEL to arrive at a market consistent value of the liabilities. It captures the economic value of “non-hedgeable” risks (as Reserving, Pricing, Catastrophe, Lapse, Counterparty Default and Operational) in order to ensure that the value of technical provisions is equivalent to the amount that an insurance company would be expected to require to take over and meet the insurance obligations. The Risk Margin is calculated with a Cost of Capital (CoC) approach at Line of Business level taking the diversification benefits between risk types and Lobs into account.

A brief overview of the main P&C Technical Provisions is presented in the following tables.

Fair Value of Outstanding Claims Reserve

(€ thousand)	Amount
Gross IFRS Reserve	142.169
Net IFRS Reserve	122.318
Best Estimate of Liabilities Gross of Reinsurance	114.758
Recoverables from Reinsurance	15.637
Best Estimate of Liabilities Net of Reinsurance	99.120
Risk Margin	6.284
Technical Provisions Net of Reinsurance	**105.404**

Fair Value of Premiums Reserve

(€ thousand)	Amount
Gross IFRS Reserve	44.540
Net IFRS Reserve	38.020
Best Estimate of Liabilities Gross of Reinsurance	23.958
Recoverables from Reinsurance	-216
Best Estimate of Liabilities Net of Reinsurance	24.174
Risk Margin	3.878
Technical Provisions Net of Reinsurance	**28.051**

Fair Value of Outstanding Claims Reserve

(€ thousand)	Statutory reserves net of reinsurance	Best Estimate Net of Reinsurance	Risk Margin Regulatory view	Technical Provisions Net of reinsurance
Direct & Proportional Accepted Business	**122.318**	**99.120**	**6.284**	**105.404**
Workers compensation	0	0	0	0
Medical expense	0	0	0	0
Income protection	436	228	11	239
Motor vehicle liability	53.455	39.172	1.363	40.535
Other motor	4.552	2.544	33	2.576
Marine, aviation and transport	2.073	923	145	1.069
Fire and other damage to property	14.527	11.238	1.433	12.671
General liability	46.240	44.219	3.263	47.482
Credit and suretyship	0	0	0	0
Legal expenses	0	0	0	0
Assistance	0	0	0	0
Miscellaneous financial loss	1.035	796	37	833
Non-Proportional Accepted Business	**0**	**0**	**0**	**0**
Total Business	**122.318**	**99.120**	**6.284**	**105.404**

Fair Value of Premiums Reserve

(€ thousand)	Statutory reserves net of reinsurance	Best Estimate Net of Reinsurance	Risk Margin Regulatory view	Technical Provisions Net of reinsurance
Direct & Proportional Accepted Business	**38.020**	**24.174**	**3.878**	**28.051**
Workers compensation	0	0	0	0
Medical expense	0	0	0	0
Income protection	1.019	187	40	227
Motor vehicle liability	14.822	10.247	969	11.216
Other motor	4.958	3.497	137	3.633
Marine, aviation and transport	796	328	166	494
Fire and other damage to property	10.566	5.526	1.092	6.619
General liability	3.863	4.058	1.439	5.498
Credit and suretyship	0	0	0	0
Legal expenses	0	0	0	0
Assistance	1.361	3	0	3
Miscellaneous financial loss	635	327	34	360
Non Proportional Accepted Business	**0**	**0**	**0**	**0**
Total Business	**38.020**	**24.174**	**3.878**	**28.051**

Source: Excel collecting data from TEAM Tool

It should be highlighted that no material changes in the relevant assumptions was introduced in the calculation of P&C TP compared to the previous reporting period.

P&C TP COMPARISON WITH RESERVES

The Technical Provisions calculated according to the Solvency II regulatory view are significantly lower than the IFRS Reserves reported in the financial statements, not only in Total business level but also in Lob level, a fact that proves the significantly high Reserve Adequacy. The reason for the difference is the methodology applied to each calculation.

SOURCES OF UNCERTAINTY AND SENSITIVITY ANALYSES

The possible elements and area of uncertainty that might affect the valuation of P&C TP at the valuation date, are of minor concern and effectively managed.

A Best – Worst case scenario on UBEL was performed at lob level. The sensitivities were based on a stress economic scenario.

UBEL OC:

Direct Gross Modelled UBEL (€ thousand)	Workers compen-sation	Medical expense	Income protection	Motor vehicle liability	Other motor	Marine, aviation and transport	Fire and other damage to property	General liability	Credit and surety-ship	Legal expenses	Assistance	Miscel-laneous financial loss	Total
Worst scenario	0	0	196	45.589	2.965	2.363	20.816	54.444	0	0	0	964	**127.337**
Central scenario	0	0	230	39.991	2.585	2.061	19.085	49.378	0	0	0	839	**114.169**
Best scenario	0	0	196	34.394	2.204	1.758	17.353	44.312	0	0	0	715	**100.933**

Source: Excel collecting data from TEAM Tool

UBEL UP:

Direct Gross UBEL UP With CB (€ thousand)	Workers compens ation	Medical expense	Income protection	Motor vehicle liability	Other motor	Marine, aviation and transport	Fire and other damage to property	General liability	Credit and suretyship	Legal expenses	Assist ance	Miscellan eous financial loss	Total
Worst scenario	0	0	220	12.093	3.857	551	5.724	4.747	0	0	1	368	**27.561**
Central scenario	0	0	198	10.162	3.397	489	5.090	4.432	0	0	1	327	**24.095**
Best scenario	0	0	176	8.231	2.936	426	4.456	4.116	0	0	1	286	**20.628**

Source: Excel collecting data from TEAM Tool

LONG-TERM GUARANTEES MEASURES (VOLATILITY ADJUSTMENT AND TRANSITIONAL MEASURES)

The volatility adjustment (as referred to in Article 77d of the Omnibus II Directive) is used. The impact of the change to zero of the volatility adjustment on P&C TP is quantified in the following table. The Delta created is relatively small in comparison with the Reserve volume both for Claim Reserves and Premium Reserves (0,5%).

Best Estimates Liabilities of Outstanding Claims Reserves

(€ thousand)	Direct (Gross)	Accepted Prop. (Gross)	Accepted Non Prop. (Gross)	Total BU (Gross)
Total with VA	113.711	1.047	0	114.758
Total w/o VA	114.238	1.051	0	115.289
Delta	**-527**	**-5**	**0**	**-532**

Best Estimates Liabilities of Premiums Reserves

(€ thousand)	Direct (Gross)	Accepted Prop. (Gross)	Accepted Non Prop. (Gross)	Total BU (Gross)
Total with VA	23.933	25	0	23.958
Total w/o VA	24.025	25	0	24.050
Delta	**-92**	**0**	**0**	**-92**

Source: Excel collecting data from TEAM Tool

At this point, it should be highlighted that no transitional measures on the risk-free interest rate-term structure and on technical provisions are applied.

Link with QRTs for public disclosure: S.02.01.02, S.17.01.02, S.22.01.21

D.3. OTHER LIABILITIES

D.3.1. VALUATION OF LIABILITIES FOR SOLVENCY II BALANCE SHEET

EXCLUSION OF IFRS VALUATION METHODS

In this chapter, an overall description of the SII valuation methods for Liabilities other than technical provision is given, complementary to the general Valuation for Solvency Purposes (paragraph D - introduction).

L2-DR, in accepting valuation methods defined in IFRS, anticipates that there are cases where IFRS valuation methods are not consistent with Art 75 requirements.

L2-DR states the exclusion of specific valuation methods such as cost or amortized cost and models where value is determined at the lower of the carrying amount and fair value less costs to sell.

SII SPECIFICITIES

L2-DR specifies the treatment of the liabilities listed below, for which a valuation different from IAS/IFRS measurement is required:

- technical liabilities
- deferred taxes.

Except for technical liabilities (that have been already disclosed in the previous D.2. Technical provisions), all the remaining points are analyzed in the next dedicated sections.

DEFERRED TAXES

Deferred taxes recognized on liability side follows the same assumptions of deferred taxes recognized on assets side. Consequently, the same consideration provided in D.1. Assets could be replied for liabilities purposes.

Although recalling the IAS 12 principles are accepted in the current SII regulatory framework, in order to avoid any possible misunderstanding about IAS 12 interpretation and application, SII legislation clarifies explicitly that all the reference amounts on which determination of deferred taxes is based on should be calculated in accordance with SII valuation instead of IFRS rules.

Mutatis mutandis the IFRS assessment with SII valuation of assets and liabilities, IAS 12 is fully applicable for SII regulations.

D.3.2. MVBS – DETAILS ON LIABILITIES OTHER THAN TECHNICAL PROVISIONS

In the below table, there is a proposal of qualitative and quantitative description of balance sheet assets, as required by regulation.

Any qualitative information should refer to Local GAAP statutory balance sheet, consequently the suggested notes should be interpreted as hints of the description.

amounts in thousand	Solvency II value (a)	Statutory accounts value (b)	Change to SII value (a-b)	Notes
Provisions other than technical provisions	7.213	7.213	0	No difference between IFRS statutory accounts and SII value (both of them recognized in accordance with IAS 37 at fair value that is deemed to be compliant with Art 75 L1 – Dir.)
Pension benefit obligations	1.596	1.596	0	No difference between IFRS statutory accounts and SII value (both of them recognized in accordance with IAS 19 at fair value)
Deposits from reinsurers	1.564	1.564	0	Change to SII value due to the different accounting approach: deposits to reinsurers are recognized at IAS/IFRS amortized cost for statutory accounts, while SII value recognized them at IFRS fair value. In dependance on the reinsurance agreement (if for instance the return of the deposit is the variable risk free return) the cost could represent an acceptable proxy of the fair value of the cash deposits; in some cases, more enhanced model are used, based on cash flows related to the deposit and regulated by the reinsurance agreement itself.
Deferred tax liabilities	999	0	999	SII dtl are based on the difference between the SII value of assets and liabilities and the value for tax purposes on a item by item basis, using the expected tax rate to be applied when assets (liabilities) are realized (settled) and considering potential impact of any announcement of amendment to tax rate. Discount of DTL is not allowed. Carrying amount of deferred tax liabilities is reviewed at each balance sheet date (recovery test based on estimation of future taxable profits).
Insurance & intermediaries payables	5.304	5.304	0	No relevant change to SII value moving from statutory to MVBS accounts due to close duration and maturity and to the absence of expected interest cash-flows. As general assumptions, we expect that ifrs amortized cost could be equal to the SII value
Reinsurance payables	25.837	25.837	0	
Payables (trade, not insurance)	13.213	13.213	0	
Total liabilities	**55.727**	**54.728**	**999**	

The template above refers to the scheme required for PIII reporting (qrt: S_02_01) and focuses on the differences between:

- MVBS SII values
- and
- statutory accounts figures, based on IAS/IFRS principles driving the determination of Generali Group consolidated IFRS financial statement.

The sample text in the table should be interpreted as an example of possible comments if the statutory accounts value is defined according to IFRS principles. They have to be adapted to Company specificities.

In the following of this sub-chapter, relevant information about some identified liability class is provided.

Provisions other than technical provisions

IAS 37 is regulating provision other than technical provision and it is deemed to be compliant with Art 75 L1 – Dir. For this reason, there are no differences on this item between IFRS statutory account and MVBS value being the valuation models adopted the same in both scenarios.

The amount recognized as provision represents the amount that an entity would rationally pay to settle the obligation at the end of the reporting period or to transfer it to a third party at that time (best estimate approach)1. In reaching the best estimate of a non-technical provision, the following elements are considered:

- circumstances to be taken into account for the calculation of the amount to be recognized as a provision
- risks surrounding many events related to the obligation are included in the valuation model
- uncertainties as well as period of incurrence of the obligation and different expected cash-flows are estimated based on model assumptions
- discount rate used to determine the best estimate of provisions other than technical provisions (before tax impact) reflects market conditions of the time value of money and the risks specific to the liability at valuation date and does not include risks for which future cash flow estimates have been already adjusted.

Generali Hellas SA Provisions Other than Technical consist only provisions for Bad Debtors

Employee benefits liabilities

Valuation in IFRS statutory accounts is in compliance with SII requirements and based on IAS 19 statement. IAS19 requires that retirement benefit arrangements should be classified as defined benefit or defined contribution plans. Defined contribution plans are accounted for on a cash basis while the accounting treatment of defined benefit plans is more complicated and requires actuarial valuations because the standard requires that the costs of defined benefit plans be attributed to periods of employee service.

The amount of Employee Benefits Liabilities recognized as a liability represents the net total of the followings:
(The present value of the obligation at valuation date) (-) (The fair value at the valuation date of plan assets (if any) out of which the obligations are to be settled directly)

This amount may be negative (and recognized as an asset)2.

The valuation method adopted called projected unit credit method is based on an actuarial approach with regards to:

- estimation of the benefit that employees will earn in return for their service, valued at the moment in which it will fall due (ultimate cost3)
- identification of the part of the benefit evaluated above, related to current and prior periods
- determination of the present value of that part of the benefit identified in b., split into:
  - ✓ current service cost (present value of the part of future benefit earned in the current year which is the cost of the period) and
  - ✓ benefit obligation (present value of future benefit earned in the current and previous periods which is the final liability of the period).

The basic instruction to determine assumptions to evaluate both ultimate cost and present values are:

- actuarial assumptions are entity's best estimates of the demographic and financial variables that will determine the ultimate cost of providing long-term benefits

[1] Where a single obligation is being measured, the individual most likely outcome may be the best estimate of the liability. However, even in such a case, the entity considers other possible outcomes. Where other possible outcomes are either mostly higher or mostly lower than the most likely outcome, the best estimate will be a higher or lower amount, while where the provision being measured involves a large population of items, the obligation is estimated by weighting all possible outcomes by their associated probabilities.

[2] In this case the entity measures the assets at the lower of:

- the amount above determined; **and**
- the present value of any economic benefits available in the form of refunds from the plan or reductions in future contributions to the plan. This present value is determined using the discount rate used in the calculation of the benefit obligation (high quality corporate bond).

[3] The ultimate cost of a defined benefit plan or another long term employee benefit may be influenced by many variables, such as final salaries, employee turnover and mortality, medical cost trends and the investment earnings on the related assets (the last only for a defined benefit plan or another long term employee benefit, both funded).

- the rate used to discount long term benefit obligations, determined by reference to market yields at the balance sheet date on high quality corporate bonds4.

The projected unit credit method assumes that each period of service gives rise to an additional unit of benefit entitlement. Each unit is separately measured to build up the final obligation.

The retirement indemnities for the employees of Generali Hellas are classified as a defined benefit plan. The calculations are based on the benefits of the staff retirement indemnities as they are described in the Greek Law 2112/1920 at the valuation date.

The assumptions used for the factors affecting the present values of future cash flows at the valuation date are summarized in the table below:

Valuation Date	Discount Rate	Salary Increase	Inflation Rate
31/12/2016	1.68%	2.00%	1.75%

The assumptions are used to project all future cash flows, and then discount cash flows to each measurement date. The past service liabilities are the portion of these discounted cash flows which have been earned by service to each measurement date. The one-year cost is the portion of these discounted cash flows, which will be earned through service over the 12 months following the measurement date.

The valuation results are presented in the table below:

(€ thousand)	Present value of defined benefit plan wholly unfunded
Opening balance	1.426
Effect of asset ceiling	
Benefits paid	-122
Past service cost	
Current service cost	71
Interest cost	33
Contribution by plan participants	
Actuarial gain/loss	103
Gains and losses on settlement	85
Currency translation differences	
Total IAS 19 net liability (asset)	**1.596**

Deferred tax liabilities

Solvency II regulatory framework states that MVBS deferred tax liabilities, representing the amounts of income taxes payable in future periods in respect of taxable temporary differences, are recognized in respect of deductible temporary differences5 and determined on the basis of the difference between the values ascribed to assets and liabilities (recognized and valued in accordance with Articles 75-86 of L1 -Dir) and the values ascribed to assets and liabilities as recognized and valued for tax purposes.

In the MVBS, deferred tax liabilities arise on differences between:

- the value ascribed to an asset or a liability for tax purposes, and
- its value in accordance to the Solvency II principles.

For calculating the amount of deferred taxes, any mismatch between the MVBS value of assets /liabilities under analysis and their related carrying value for tax purposes should be considered.

[4] Currency and term of the corporate bonds or government bonds are consistent with the currency and estimated term of the long-term benefit obligations.

[5] A temporary difference is a difference between the carrying amount of an asset or liability in the balance sheet and its tax base.

A deferred tax liability (DTL) is the recognition of a tax debt to be paid later on because of a future profit which is already anticipated in the economic balance sheet. This profit (i.e. the difference between the market value and the book value) leads to an increase of the net asset value. A DTL will be recognized for unrealized taxable gains such as an increase of a financial asset value, or a decrease of the value of technical provisions when shifting from book value to market value.

With reference to taxable temporary differences, IAS 12 provides that the entity shall recognize a deferred tax liability for all taxable temporary differences with some exceptions.

D.4. ALTERNATIVE METHODS FOR VALUATION

D.4.1. ASSETS

For Generali Hellas SA there are no alternative methods for valuation used.

In respect of the official SII data valuation, there are no significant changes to valuation models used and to model inputs. In general terms, it has to be noticed that the vast majority of assets portfolio owned by European insurance and reinsurance undertakings is recognized at IFRS fair value determined centrally by Generali Investments Europe in application of the official group asset pricing policy.

Despite the general framework for assets valuation, it is worthwhile to mention that for SII receivables there is a dedicated SII valuation, partially diverting from the policies described above.

As general supposition, it is accepted to assume as SII value of receivables an amount equal to the IFRS book value of receivables, based on the IFRS amortized cost. This approach is coherent with the overall SII metrics considering the non-materiality of the change to fair value of those assets usually having very brief duration and maturity and no expected cash-flows generation. It is worthwhile to mention that if the simplified assumption is not reflecting properly the economic valuation of receivables, this approach is not adopted and a full SII economic valuation is provided to determine the fair value of receivables.

D.4.2. LIABILITIES

Despite the general framework for liabilities valuation, it is worthwhile to mention that - as general supposition -, it is accepted to assume as SII value of payables an amount equals to the IFRS book value of payables, based on the IFRS amortized cost. This approach is coherent with the overall SII metrics considering the non-materiality of the change to fair value of those liabilities usually having very brief duration and maturity and no expected cash-flows generation. It has to be worthwhile to mention that if the simplified assumption is not reflecting properly the economic valuation of payables, this approach is not adopted and a full SII economic valuation is provided to determine the fair value of payables.

D.5. ANY OTHER INFORMATION

D.5.1. OWN FUNDS: LEGISLATIVE FRAMEWORK AND DEFINITION

According to the Article 87 of the Directive 2009/138/EC (the Directive), own funds comprise the "…sum of basic own funds, referred to in Article 88 and ancillary own funds referred to in Article 89".

BASIC OWN FUNDS

According to Article 88 of L1-Dir, BOF are defined as the sum of the excess of assets over liabilities (reduced by the amount of own shares held by the insurance or reinsurance undertaking) and subordinated liabilities.

The components of the excess of assets over liabilities are valued in accordance with Article 75 and Section 2 of the Directive, which states that all assets and liabilities must be measured on market consistent principles. These principles are the basis for definitions reported in chapter D Valuation for Solvency Purposes.

According to Article 69, Article 72 and Article 76 of L2-DR, BOF items shall include the following:

- Ordinary share capital and the related share premium account
- Initial funds, members' contributions or the equivalent basic own-fund item for mutual and mutual-type undertakings
- Subordinated mutual member accounts
- Surplus funds that fall under L1 Article 91 (2)
- Preference shares and the related share premium account
- Reconciliation reserve
- Subordinated liabilities valued in accordance with L1 Article 75
- Net deferred tax assets

From a practical perspective, the reconciliation reserve is a calculated item; it is obtained from excess of assets less liabilities lowered by any other item required to be identified separately by regulation.

BOF items shall be classified into three tiers, depending on the extent to which they possess specific characteristics, explained in the next paragraph. Generally, assets which are free from any foreseeable liabilities are available to absorb losses due to adverse business fluctuations on a going-concern basis and in the case of winding-up. Therefore the vast majority of the excess of assets over liabilities, as valued in accordance with the principles set out in L1 - Dir, should be treated as high-quality capital (Tier 1).

For classification purposes, it is worthwhile anticipating that in accordance with previous comment, the reconciliation reserve is Tier 1 while deferred tax assets are, instead, Tier 3.

CLASSIFICATION SCHEME

According to L1 - Dir, article 93, to grant the quality of available capital, BOF items shall be classified into tiers depending on whether they satisfy the following characteristics:

- The item is available, or can be called up on demand, to fully absorb losses on a going-concern basis, as well as in the case of winding-up (permanent availability)
- In the case of winding-up, the total amount of the item is available to absorb losses and the repayment of the item is refused to its holder until all other obligations, including insurance and reinsurance obligations towards policy holders and beneficiaries of insurance and reinsurance contracts, have been met (subordination)
- Consideration shall be given to the duration of the item, in particular whether the item is dated or not. Where an own-fund item is dated, the relative duration of the item as compared to the duration of the insurance and reinsurance obligations of the undertaking shall be considered (sufficient duration)
- whether the item is free from requirements or incentives to redeem the nominal sum (absence of incentives to redeem)
- whether the item is free from mandatory fixed charges (absence of mandatory servicing costs)
- whether the item is clear of encumbrances (absence of encumbrances).

The different own funds items shall be classified into Tiers considering if they possess specific characteristics according to the following scheme:

TIER	permanent availability to cover losses	subordination of the holder	sufficient duration	absence of incentive to redeem	absence of mandatory servicing costs	absence of encumbrances
Tier 1	×	×	×	×	×	×
Tier 2		×	×	×	×	×
Tier 3	*Residual*					

LIST OF TIER 1 BOF

Article 69 of L2-DR lists Tier 1 BOF items, assuming they substantially possess the Tier 1 characteristics notice that:

- the part of excess of assets over liabilities, valued in accordance with Article 75 and Section 2 of Chapter VI of Directive 2009/138/EC, comprising the following items:
  - ✓ paid-in ordinary share capital and the related share premium account
  - ✓ paid-in initial funds, members' contributions or the equivalent basic own-fund item for mutual and mutual-type undertakings
  - ✓ paid-in subordinated mutual member accounts
  - ✓ surplus funds that are not considered insurance and reinsurance liabilities in accordance with Article 91(2) of Level 1 Directive
  - ✓ paid-in preference shares and the related share premium account
  - ✓ a reconciliation reserve
- paid-in subordinated liabilities valued in accordance with Article 75 of Directive 2009/138/EC when they posses Tier 1 features.

In the following, some specific guidelines with regard to Tier 1 items are given excluding items described in points II. and III. that are not applicable for Generali Group entities:

A. Paid-in ordinary share capital

According to Section II B of L3 Guidelines (Guideline 1), undertakings should identify paid-in ordinary share capital by the following properties:

- the shares are issued directly by the undertaking with the prior approval of its shareholders or, where permitted under national law, its administrative, supervisory or management body (hereinafter “AMSB”)
- the shares entitle the owner to a claim on the residual assets of the undertaking in the event of winding-up proceedings, which is proportionate to the amount of the items issued, and is neither fixed nor subject to a cap.

Where an undertaking describes more than one class of shares as ordinary share capital:

- it should assess the features for determining classification as ordinary share capital set out in Article 71 of L2-DR (Tier 1 Features determining classification) in relation to each class of shares separately
- it should identify the differences between classes which provide for one class to rank ahead of another or which create any preference as to distributions, and only consider as possible Tier 1 ordinary share capital the class which ranks after all other claims and has no preferential rights
- it should consider as possible Tier 1 preference shares, any share classes ranking ahead of the most subordinated class or which have other preferential features which prevent them from being classified as Tier 1 ordinary share capital in accordance with points (a) and (b).

B. Surplus funds

Article 91 of L1-Dir states that surplus funds “…shall be deemed to be accumulated profits which have not been made available for distribution to policy holders and beneficiaries”. Moreover “In so far authorized under national law, surplus funds shall not be considered as insurance and reinsurance liabilities to the extent that they fulfil the criteria set out in Article 94 (1)”.

C. Reconciliation reserve

According with Recital 35 of L2-DR, “Insurance and reinsurance undertakings should divide the excess of assets over liabilities into amounts that correspond to capital items in their financial statements and a reconciliation reserve. The reconciliation reserve may be positive or negative”.

Article 70 of L2-DR states that ‘The determination of whether, and to what extent, the reconciliation reserve displays the features of Tier 1 BOF shall not assess the features of the assets and liabilities that are included in computing the excess of assets over liabilities or the underlying items in the undertakings' financial statements'.

It is worthwhile noting that this last paragraph according to Generali Group, de facto wavering some of the classification criteria for the reconciliation reserve, can be interpreted as recognizing the specific nature of this residual item which is represented by the reconciliation reserve. Furthermore, the limited applicability of the other classification criteria (sufficient duration, absence of encumbrances, absence of mandatory servicing costs and absence of incentives to redeem) to the reconciliation reserve might lead to the conclusion that the reconciliation reserve is to be considered as Tier 1, unless specific evidence of the contrary exists.

The Article 70 of L2-DR specifies some definitions with regard to the reconciliation reserve.

More in detail, the reconciliation reserve shall equal the total excess of assets over liabilities reduced by:

- the amount of own shares held by the insurance and reinsurance undertaking
- foreseeable dividends, distributions and charges
- the basic own-fund items included in other BOF items (Tier1, Tier 2 or Tier 3)
- the basic own-fund items not mentioned in the lists of DA, which have been approved by the supervisory authority in accordance with Article 79 of L2-DR
- the restricted own-fund items that meet one of the following requirements:
  - ✓ exceed the notional Solvency Capital Requirement in the case of matching adjustment portfolios and ring-fenced funds determined in accordance with Article 81(1) of L2-DR
  - ✓ that are excluded in accordance with Article 81 (2) of L2-DR
- the amount of participations held in financial and credit institutions deducted in accordance with the treatment of participations in the determination of BOF (Article 68 of L2-DR), to the extent that this is not already included in points (a) to (e).

Section II B of L3 Guidelines (Guideline 2) gives some details on point b, ie on the identification of the own shares and of the foreseeable dividends and distributions to be considered:

- Own shares that reduce the reconciliation reserves are both own shares held directly and indirectly
- As far as the feature 'foreseeable', a dividend or distribution has to be considered to be foreseeable at the latest when it is declared or approved by the supervisory or management body, or the other persons who effectively run the undertaking, regardless of any requirement for approval at the annual general meeting
- moreover, where a participating undertaking holds a participation in another undertaking, which has a foreseeable dividend, the participating undertaking should make no reduction to its reconciliation reserve for that foreseeable dividend.

In the same guideline it is stated that amount of foreseeable charges to be taken into account in deduction of reconciliation reserve are:

- the amount of taxes
- the amount of any obligations or circumstances arising during the related reporting period which are likely to reduce the profits of the undertaking and for which the supervisory authority is not satisfied that they have been appropriately captured by the valuation of assets and liabilities.

To introduce the limitations due to ring fenced funds, it is worthwhile mentioning that not all assets within an undertaking are unrestricted. In some Member States, specific products result in ring-fenced fund structures which give one class of policy holders greater rights to assets within their own fund. Although those assets are included in computing the excess of assets over liabilities for own-fund purposes they cannot in fact be made available to meet the risks outside the ring-fenced fund. To be consistent with the economic approach, the assessment of own funds needs to be adjusted to reflect the different nature of assets, which form part of a ring-fenced arrangement. Similarly, the Solvency Capital Requirement calculation should reflect the reduction in pooling or diversification related to those ring-fenced funds. With regard to the ring fenced funds (RFF), Recital 37 of L2- DA provides the following definition "Ring-fenced funds are arrangements where an identified set of assets and liabilities are managed as though they were a separate undertaking, and should not include conventional index-linked, unit-linked or reinsurance business. The reduced transferability of the assets of a ring-fenced fund should be reflected in the calculation of the excess of assets over the liabilities of the insurance or reinsurance undertaking".

The precise definition can be taken by Article 80 of the L2-DR that aims to regulate the adjustments to companies BOF. Article 80 states that "A reduction of the reconciliation reserve shall be required where own-fund items within a ring-fenced fund have a reduced capacity to fully absorb losses on a going-concern basis due to their lack of transferability within the insurance or reinsurance undertaking for any of the following reasons:

- the items can only be used to cover losses on a defined portion of the insurance or reinsurance undertaking's insurance or reinsurance contracts
- the items can only be used to cover losses in respect of certain policy holders or beneficiaries or
- the items can only be used to cover losses arising from particular risks or liabilities."

Please note that the recital 39 of L2- DA states explicitly that:
"Ring-fenced funds should be limited to those arrangements that reduce the capacity of certain own fund items to absorb losses on a going concern basis. Arrangements that only affect loss absorbency in the case of winding-up should not be considered as ring-fenced funds."

D. Subordinated liabilities

With regard to subordinated liabilities, item which meet requirements to be classified as BOF, should be valued according to Article 75 of the L1 – Dir ("…b) liabilities shall be valued at the amount for which they could be transferred, or settled, between knowledgeable willing parties in an arm's length transaction. When valuing liabilities under point b), no adjustment to take account of the own credit standing of the insurance or reinsurance undertaking shall be made"). For a more detailed description of the valuation methods, please refer to the related "Valuation" section. For a description of the applicability of grandfathering rules, please refer to the "Transitional arrangements" section.

LIST OF TIER 2 BOF

Article 72 of L2-DR lists the Tier 2 basic own-fund items:

- the part excess of assets over liabilities, valued in accordance with Article 75 and Section 2 of Chapter VI of Directive 2009/138/EC, comprising the following items:
  - ✓ ordinary share capital and the related share premium account
  - ✓ initial funds, members' contributions or the equivalent basic own-fund item for mutual and mutual-type undertakings
  - ✓ subordinated mutual member accounts
  - ✓ preference shares and the related share premium account
- Subordinated liabilities valued in accordance with Article 75 of Directive 2009/138/EC.

TIER 3 BOF AND THEIR FEATURES

Tier 3 represents the residual category of own funds. According to L1- Dir, Article 94 (Main criteria for the classification into tiers), after having detected if own funds items do not possess the feature to be classified into Tier 1 or Tier 2, the own fund item shall be classified in Tier 3.

ANCILLARY OWN FUNDS

According to Article 89 of Directive, Ancillary Own Funds (AOF) are defined as "…items other than basic own funds which can be called up to absorb losses".

The nature of ancillary own funds is such that they are contingent assets, which are not recognized on the balance sheet. This contingent nature entails the need for supervisory approval for recognition. If, at some undetermined point in the future, the ancillary own funds are called up, they cease to be contingent assets and become basic own-fund items.

Note that AOF become BOF when they are called up, i.e. the characteristic of not being called up distinguishes them from BOF and determines their lower quality and tiering.

This category effectively comprises off balance sheet commitments, that the undertaking can call upon in order to increase its financial resources.

Article 74 of DA lists the AOF items:
- 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 which are held in trust for the benefit of insurance creditors by an independent trustee and provided by credit institutions authorised in accordance with Article 8 of Directive 2013/36/EU
- letters of credit and guarantees provided that the items can be called up on demand and are clear of encumbrances
- any future claims which mutual or mutual-type associations of shipowners with variable contributions solely insuring risks listed in classes 6, 12 and 17 in Part A of Annex 1 of Directive 2009/138/EC may have against their members by way of a call for supplementary contributions, within the following 12 months
- any future claims which mutual or mutual-type associations may have against their members by way of a call for supplementary contributions, within the following 12 months, provided that a call can be made on demand and is clear of encumbrances
- other legally binding commitments received by the insurance or reinsurance undertaking, provided that the item can be called up on demand and is clear of encumbrances.

According to article 90 of the Directive, the amounts of ancillary own-fund items to be taken into account when determining own funds shall be subject to prior supervisory approval.

TIERING OF ANCILLARY OWN FUNDS

As for BOF, Article 93 of the Directive defines the characteristics of an item, in order to be considered as AOF. More in detail, AOF are classified into Tier 2 category, when they comply with Article 75 of DA requirements ("…display the features of basic own fund item classified in Tier 1 in accordance with Articles 69 and 71 once that item has been called up and paid in."), whereas, according to the Article 78 of DA, AOF that "…have been approved by the supervisory authority in accordance with Article 90 of Directive 2009/138/EC, and which do not display all of the features set out in Article 75 shall be classified as Tier 3 ancillary own funds".

TIER	permanent availability to cover losses	subordination of the holder	sufficient duration	absence of incentive to redeem	absence of mandatory servicing costs	absence of encumbrances
Tier 2	×	×	×	×	×	×
Tier 3	Residual					

More in detail, according to Level 3 Guidelines on Ancillary Own Funds , the following kinds of own funds items might have to be classified and the approaches set out below should be followed in making the classification:

- Capital instruments:
  - ✓ These consist of instruments which if called up will generate an asset, often in the form of cash, while simultaneously creating corresponding interests in (for example, ordinary shares) or liabilities of (for example, certain subordinated debts) the undertaking.
  - ✓ Undertakings should assess the characteristics and determine which tier a capital instrument would belong to if called up or satisfied. Ordinary shares (assuming they do not possess any unconventional features) which are fully paid-in would be classified as Tier 1. Subordinated debt instruments which are fully paid-in may be classified as Tier 2 if they do not possess the characteristics necessary for Tier 1 classification.

- ✓ Capital instruments in their ancillary form should then be classified as one tier lower than that applying to paid-in forms of such instruments. If paid-in ordinary shares are classified as Tier 1, issued but uncalled ordinary shares should be classified as Tier 2 ancillary own funds.

- Capital contributions:
  - ✓ These will generate an asset, often in the form of cash, for an undertaking without creating corresponding liabilities of the undertaking. This would be the case of a "capital call" on private equity fund or SICAV.
  - ✓ The "on balance sheet treatment" of contributions which are fully paid-in is to increase an undertaking's assets. This is because the undertaking receives cash when the counterparty fulfills its obligations. Additionally, since these contributions do not create any corresponding liabilities for the undertaking, the undertaking's receipt of funds in the form of a contribution also increases the undertaking's reserves (by increasing profits or reducing losses).
  - ✓ An increase in reserves would be classified as Tier 1. Thus, a contribution that will give rise to an increase in reserves once paid-in should be classified as Tier 2 ancillary own funds.

- Arrangements which meet the undertaking's liabilities by indemnifying third-parties:
  - ✓ These consist of contractual arrangements which if called up will generate an asset, often in the form of cash, for a third-party creditor of an undertaking without creating corresponding liabilities for the undertaking. This could be given effect by a contract of indemnity obliging a third-party indemnifier to pay sums to the undertaking's creditor without obliging the undertaking to repay such sums to the indemnifier.

    Arrangements which meet the undertaking's liabilities in this way are subject to the same classification as capital contributions.

APPROVAL OF ANCILLARY OWN FUNDS

Where an own-fund item is not included in the list of own-funds pointed out in L2-DR, or whether such item would not – upon being called up – take the form of BOF items, insurance or reinsurance undertakings shall submit a request for approval of its assessment and classification to the supervisory authority before considering that item as own funds.

The insurance or reinsurance undertaking shall demonstrate to the supervisory authorities the appropriateness of the proposed classification and the legal effectiveness and enforceability of the contractual terms of the own-fund item and shall provide the supervisory authorities with information on whether the own-fund item has been fully paid-in.

According to article 90 of Level 1 Directive, supervisory authorities shall approve either of the following:
- the monetary amount for each ancillary own-fund item
- the method by which to determine the amount of each ancillary own-fund item, in which case supervisory approval of the amount determined in accordance with that method shall be granted for a specified period of time.

The approach to ancillary own funds approval envisages ongoing communication between the supervisory authorities and undertakings, including the submission of a formal application for approval of the ancillary own-fund item. Where the ancillary own-fund item on call would become an item not on the lists, and therefore two supervisory approvals are needed, such early dialogue should cover the procedural approach to be followed regarding this need for two approvals. In order to convey the formal application process, early dialogue may also cover matters of economic substance, legal effectiveness and enforceability but not the status of the counterparty, which always needs to be considered at the time of the formal application.

The supervisory authority approves an amount of ancillary own funds based on a request by the (re)insurance undertaking. The amount that the supervisory authority approves can be lower than the amount requested by the (re)insurance undertaking. The request for approval must be based on a robust assessment by the (re)insurance undertaking of the recoverability, accompanied by all information the supervisory authority needs in issuing approval. In this process, the supervisory authority can use information that it has obtained from sources other than the (re)insurance undertaking.

The supervisory authority should not determine the classification of an ancillary own-fund item based on the form in which the item is presented or described. The supervisory authority's assessment and the classification of the potential ancillary own-fund item should depend upon the item's economic substance and the extent to which it would satisfy the characteristics and features listed above.

The Draft proposal for Level 3 Guidelines on Ancillary Own Funds specifies actions to be taken by the undertaking with reference to the request for approval of a potential ancillary own funds item.

DEDUCTION FROM OWN FUNDS

Article 68 of DA, with reference to the treatment of participations in the determination of BOF specifies that:

- For the purpose of determining the basic own funds of insurance and reinsurance undertakings, basic own funds as referred to in Article 88 of Directive 2009/138/EC shall be reduced by the full value of participations, as referred to in Article 92(2) of that Directive, in a financial and credit institution that exceeds 10% of items included in points (a) (i), (ii), (iv) and (vi) of Article 69.
- For the purpose of determining the basic own funds of insurance and reinsurance undertakings, basic own funds as referred to in Article 88 of Directive 2009/138/EC shall be reduced by the part of the value of all participations, as referred to in Article 92(2) of that Directive, in financial and credit institutions, other than participations referred to in paragraph 1, that exceeds 10% of items included in points (a) (i), (ii), (iv) and (vi) of Article 69.
- Notwithstanding paragraphs 1 and 2, insurance and reinsurance undertakings shall not deduct strategic participations as referred to in Article 171 which are included in the calculation of the group solvency on the basis of method 1 as set out in Annex I to Directive 2002/87/EC.
- The deductions set out in paragraph 2 shall be applied on a pro-rata basis to all participations referred to in that paragraph.
- The deductions set out in paragraphs 1 and 2 shall be made from the corresponding tier in which the participation has increased the own funds of the related undertaking as follows:
  - ✓ holdings of Common Equity Tier 1 items of financial and credit institutions shall be deducted from the items included in points (a) (i), (ii), (iv) and (vi) of Article 69
  - ✓ holdings of Additional Tier 1 instruments of financial and credit institutions shall be deducted from the items included in points (a)(iii) and (v) and point (b) of Article 69
  - ✓ holdings of Tier 2 instruments of financial and credit institutions shall be deducted from the basic own-fund items included in Article 72.

To clarify the deduction rules described in points 1 and 2, BOF shall be reduced when:

- The value of the individual participations in a financial and credit institution exceeds 10% of undertakings own funds
- The sum of the values of the other participations in a financial and credit institution (i.e. those non individually exceeding the 10%) exceeds 10% of undertakings own funds
- Deductions defined in points a) and b) are not applicable in case of strategic participations.

It is worthwhile to underline the fact, that the Generali Group approach is to consider all participations as strategic and for this reason no deduction shall be performed.

ELIGIBLE OWN FUNDS

Article 69 of DA, states the following quantitative limitations, with regard to the tiering of Own Funds:

- As far as compliance with the Solvency Capital Requirement is concerned, the eligible amounts of Tier 2 and Tier 3 items shall be subject to all of the following quantitative limits:
  - ✓ the eligible amount of Tier 1 items shall be at least one half of the Solvency Capital Requirement
  - ✓ the eligible amount of Tier 3 items shall be less than 15 % of the Solvency Capital Requirement
  - ✓ the sum of the eligible amounts of Tier 2 and Tier 3 items shall not exceed 50 % of the Solvency Capital Requirement.

- As far as compliance with the Minimum Capital Requirements is concerned, the eligible amounts of Tier 2 and Tier 3 items shall be subject to all of the following quantitative limits:
  - ✓ the eligible amount of Tier 1 items shall be at least 80 % of the Minimum Capital Requirement
  - ✓ the sum of the eligible amounts of Tier 2 items, excluding Ancillary Own Funds, shall not exceed 20% of the Minimum Capital Requirement.
- Within the limit referred to in point (a) of paragraph 1 and point (a) of paragraph 2, the sum of the following basic own-fund items shall make up less than 20 % of the total amount of Tier 1 items:
  - ✓ items referred to in point (a)(iii) of Article 69
  - ✓ items referred to in point (a)(v) of Article 69
  - ✓ items referred to in point (b) of Article 69
  - ✓ items that are included in Tier 1 basic own funds under the transitional arrangement set out in Article 308b(9) of Directive 2009/138/EC.

With regard to the quantitative limit defined by Article 69 (2) above, the Guidelines on Solvency II relating to Pillar 1 requirements (the Guidelines) state under guideline 20.1.80, that entities can "…consider those restricted Tier 1 items in excess of the 20% limit as available as Tier 2 basic own funds."

Annex

QRT TEMPLATES VALID FOR SOLO PURPOSES

Balance Sheet – Assets

	Solvency II value
Assets	
Intangible assets	0
Deferred tax assets	0
Pension benefit surplus	0
Property, plant & equipment held for own use	6.805
Investments (other than assets held for index-linked and unit-linked contracts)	**311.782**
Property (other than for own use)	0
Holdings in related undertakings, including participations	0
Equities	*0*
Equities - listed	0
Equities - unlisted	0
Bonds	*305.223*
Government Bonds	173.237
Corporate Bonds	131.987
Structured notes	0
Collateralised securities	0
Collective Investments Undertakings	5.558
Derivatives	0
Deposits other than cash equivalents	1.000
Other investments	0
Assets held for index-linked and unit-linked contracts	25.301
Loans and mortgages	**3.859**
Loans on policies	188
Loans and mortgages to individuals	219
Other loans and mortgages	3.452
Reinsurance recoverables from:	**24.797**
Non-life and health similar to non-life	15.421
Non-life excluding health	15.408
Health similar to non-life	14
Life and health similar to life, excluding health and index-linked and unit-linked	9.436
Health similar to life	9.761
Life excluding health and index-linked and unit-linked	-325
Life index-linked and unit-linked	-61
Deposits to cedants	0
Insurance and intermediaries receivables	22.770
Reinsurance receivables	16.533
Receivables (trade, not insurance)	12.953
Own shares (held directly)	0
Amounts due in respect of own fund items or initial fund called up but not yet paid in	0
Cash and cash equivalents	27.783
Any other assets, not elsewhere shown	589
Total assets	**453.171**

Balance Sheet – Liabilities

	Solvency II value
Liabilities	
Technical provisions - non-life	**148.877**
Technical provisions - non-life (excluding health)	**148.397**
TP calculated as a whole	0
Best estimate	138.287
Risk margin	10.110
Technical provisions - health (similar to non-life)	**480**
TP calculated as a whole	0
Best estimate	429
Risk margin	51
TP - life (excluding index-linked and unit-linked)	**142.415**
Technical provisions - health (similar to life)	**24.980**
TP calculated as a whole	0
Best estimate	24.404
Risk margin	576
TP - life (excluding health and index-linked and unit-linked)	**117.435**
TP calculated as a whole	0
Best estimate	113.833
Risk margin	3.602
TP - index-linked and unit-linked	**24.372**
TP calculated as a whole	0
Best estimate	23.310
Risk margin	1.061
Contingent liabilities	0
Provisions other than technical provisions	7.213
Pension benefit obligations	1.596
Deposits from reinsurers	1.564
Deferred tax liabilities	999
Derivatives	0
Debts owed to credit institutions	0
Financial liabilities other than debts owed to credit institutions	0
Insurance & intermediaries payables	5.304
Reinsurance payables	25.837
Payables (trade, not insurance)	13.213
Subordinated liabilities	0
Subordinated liabilities not in BOF	0
Subordinated liabilities in BOF	0
Any other liabilities, not elsewhere shown	0
Total liabilities	**371.390**
Excess of assets over liabilities	**81.781**

Balance Sheet – Assets

	Solvency II value	Statutory accounts value
Assets		
Intangible assets	0	496
Deferred tax assets	0	6.296
Pension benefit surplus	0	0
Property, plant & equipment held for own use	6.805	6.805
Investments (other than assets held for index-linked and unit-linked contracts)	**311.782**	**306.115**
Property (other than for own use)	0	0
Holdings in related undertakings, including participations	0	0
Equities	*0*	*0*
Equities - listed	0	0
Equities - unlisted	0	0
Bonds	*305.223*	*299.557*
Government Bonds	173.237	167.574
Corporate Bonds	131.987	131.983
Structured notes	0	0
Collateralised securities	0	0
Collective Investments Undertakings	5.558	5.558
Derivatives	0	0
Deposits other than cash equivalents	1.000	1.000
Other investments	0	0
Assets held for index-linked and unit-linked contracts	25.301	25.301
Loans and mortgages	**3.859**	**3.859**
Loans on policies	188	188
Loans and mortgages to individuals	219	219
Other loans and mortgages	3.452	3.452
Reinsurance recoverables from:	**24.797**	**29.179**
Non-life and health similar to non-life	15.421	26.371
Non-life excluding health	15.408	26.342
Health similar to non-life	14	28
Life and health similar to life, excluding health and index-linked and unit-linked	9.436	2.808
Health similar to life	9.761	1.407
Life excluding health and index-linked and unit-linked	-325	1.401
Life index-linked and unit-linked	-61	0
Deposits to cedants	0	0
Insurance and intermediaries receivables	22.770	22.770
Reinsurance receivables	16.533	16.533
Receivables (trade, not insurance)	12.953	12.953
Own shares (held directly)	0	0
Amounts due in respect of own fund items or initial fund called up but not yet paid in	0	0
Cash and cash equivalents	27.783	27.783
Any other assets, not elsewhere shown	589	589
Total assets	**453.171**	**474.843**

Balance Sheet – Liabilities

	Solvency II value	Statutory accounts value
Liabilities		
Technical provisions - non-life	**148.877**	**186.708**
Technical provisions - non-life (excluding health)	**148.397**	**185.225**
TP calculated as a whole	0	185.225
Best estimate	138.287	0
Risk margin	10.110	0
Technical provisions - health (similar to non-life)	**480**	**1.483**
TP calculated as a whole	0	1.483
Best estimate	429	0
Risk margin	51	0
TP - life (excluding index-linked and unit-linked)	**142.415**	**144.832**
Technical provisions - health (similar to life)	**24.980**	**19.073**
TP calculated as a whole	0	19.073
Best estimate	24.404	0
Risk margin	576	0
TP - life (excluding health and index-linked and unit-linked)	**117.435**	**125.759**
TP calculated as a whole	0	125.759
Best estimate	113.833	0
Risk margin	3.602	0
TP - index-linked and unit-linked	**24.372**	**24.654**
TP calculated as a whole	0	24.654
Best estimate	23.310	0
Risk margin	1.061	0
Contingent liabilities	0	0
Provisions other than technical provisions	7.213	7.213
Pension benefit obligations	1.596	1.596
Deposits from reinsurers	1.564	1.564
Deferred tax liabilities	999	0
Derivatives	0	0
Debts owed to credit institutions	0	0
Financial liabilities other than debts owed to credit institutions	0	0
Insurance & intermediaries payables	5.304	5.304
Reinsurance payables	25.837	25.837
Payables (trade, not insurance)	13.213	13.213
Subordinated liabilities	0	0
Subordinated liabilities not in BOF	0	0
Subordinated liabilities in BOF	0	0
Any other liabilities, not elsewhere shown	0	0
Total liabilities	**371.390**	**410.923**
Excess of assets over liabilities	**81.781**	**63.920**

Life and Health SLT Technical Provisions (1/3)

		Index-linked and Unit-Linked Insurance			Other Life Insurance			
	Insurance with profit participation		Contracts without options and guarantees	Contracts with options or guarantees		Contracts without options and guarantees	Contracts with options or guarantees	Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations
Technical provisions calculated as a whole	0	0			0			0
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole	0	0			0			0
Technical provisions calculated as a sum of BE and RM								
Best Estimate								
Gross Best Estimate	111.645		23.310	0		2.188	0	0
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	0		-61	0		-325	0	0
Best estimate minus recoverables from reinsurance/SPV and Finite Re	**111.645**		**23.372**	**0**		**2.513**	**0**	**0**
Risk Margin	3.590	1.061			11			0
Amount of the transitional on Technical Provisions								
Technical Provisions calculated as a whole	0	0			0			0
Best estimate	0		0	0		0	0	0
Risk margin	0	0			0			0
Technical provisions - total	**115.235**	**24.372**			**2.200**			**0**

Life and Health SLT Technical Provisions (2/3)

	Accepted Reinsurance					
		Insurance with profit participation on Accepted reinsurance (Gross)	Index-linked and unit-linked insurance on Accepted reinsurance (Gross)	Other life insurance on Accepted reinsurance (Gross)	Annuities stemming from non-life accepted insurance contracts and relating to insurance obligation other than health insurance obligations (Gross)	**Total (Life other than health insurance, incl. Unit-Linked)**
Technical provisions calculated as a whole	**0**	0	0	0	0	**0**
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole	**0**	0	0	0	0	**0**
Technical provisions calculated as a sum of BE and RM						
Best Estimate						
Gross Best Estimate	**0**	0	0	0	0	**137.144**
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	**0**	0	0	0	0	**-386**
Best estimate minus recoverables from reinsurance/SPV and Finite Re	**0**					**137.530**
Risk Margin	**0**	0	0	0	0	**4.663**
Amount of the transitional on Technical Provisions						
Technical Provisions calculated as a whole	0					**0**
Best estimate	0					**0**
Risk margin	0					**0**
Technical provisions - total	**0**					**141.807**

Life and Health SLT Technical Provisions (3/3)

	Health Insurance (direct business)	Contracts without options and guarantees	Contracts with options or guarantees	Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Health reinsurance (reinsurance accepted)	**Total (Health similar to life insurance)**
Technical provisions calculated as a whole	0			0	0	**0**
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole	0			0	0	**0**
Technical provisions calculated as a sum of BE and RM						
Best Estimate						
Gross Best Estimate		24.404	0	0	0	**24.404**
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default		9.761	0	0	0	**9.761**
Best estimate minus recoverables from reinsurance/SPV and Finite Re		**14.642**	**0**	**0**	**0**	**14.642**
Risk Margin	576			0	0	**576**
Amount of the transitional on Technical Provisions						
Technical Provisions calculated as a whole	0			0	0	**0**
Best estimate	0	0	0	0	0	**0**
Risk margin	0			0	0	**0**
Technical provisions - total	**24.980**			**0**	**0**	**24.980**

Non-life Technical Provisions (1/2)

	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
Technical provisions calculated as a whole	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole	0	0	0	0	0	0	0	0	0
Technical Provisions calculated as a sum of BE and RM									
Best estimate									
Premium provisions									
Gross - Total	**0**	**199**	**0**	**10.110**	**3.403**	**489**	**5.071**	**4.355**	**0**
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	0	12	0	-137	-93	161	-455	297	0
Net Best Estimate of Premium Provisions	**0**	**187**	**0**	**10.247**	**3.497**	**328**	**5.526**	**4.058**	**0**
Claims provisions									
Gross - Total	**0**	**230**	**0**	**39.931**	**2.590**	**2.079**	**20.105**	**48.977**	**0**
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	0	2	0	759	47	1.156	8.867	4.758	0
Net Best Estimate of Claims Provisions	**0**	**228**	**0**	**39.172**	**2.544**	**923**	**11.238**	**44.219**	**0**
Total Best estimate - gross	**0**	**429**	**0**	**50.041**	**5.994**	**2.569**	**25.176**	**53.332**	**0**
Total Best estimate - net	**0**	**415**	**0**	**49.420**	**6.040**	**1.251**	**16.764**	**48.278**	**0**
Risk margin	0	51	0	2.331	169	312	2.525	4.702	0
Amount of the transitional on Technical Provisions									
TP as a whole	0	0	0	0	0	0	0	0	0
Best estimate	0	0	0	0	0	0	0	0	0
Risk margin	0	0	0	0	0	0	0	0	0
Technical provisions - total									
Technical provisions - total	**0**	**480**	**0**	**52.373**	**6.163**	**2.880**	**27.702**	**58.034**	**0**
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	**0**	**14**	**0**	**622**	**-47**	**1.317**	**8.412**	**5.055**	**0**
Technical provisions minus recoverables from reinsurance/SPV and Finite Re- total	**0**	**466**	**0**	**51.751**	**6.210**	**1.563**	**19.290**	**52.980**	**0**

Non-life Technical Provisions (2/2)

	Direct business and accepted proportional reinsurance			Accepted non-proportional reinsurance:				Total Non-Life obligations
	Legal expenses insurance	Assistance	Miscellaneous financial loss	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport	Non-proportional property reinsurance	
Technical provisions calculated as a whole	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole	0	0	0	0	0	0	0	**0**
Technical Provisions calculated as a sum of BE and RM								
Best estimate								
Premium provisions								
Gross - Total	**0**	**1**	**329**	**0**	**0**	**0**	**0**	**23.958**
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	0	-2	3	0	0	0	0	**-216**
Net Best Estimate of Premium Provisions	**0**	**3**	**327**	**0**	**0**	**0**	**0**	**24.174**
Claims provisions								
Gross - Total	**0**	**0**	**845**	**0**	**0**	**0**	**0**	**114.758**
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	0	0	49	0	0	0	0	**15.637**
Net Best Estimate of Claims Provisions	**0**	**0**	**796**	**0**	**0**	**0**	**0**	**99.120**
Total Best estimate - gross	**0**	**1**	**1.174**	**0**	**0**	**0**	**0**	**138.715**
Total Best estimate - net	**0**	**3**	**1.122**	**0**	**0**	**0**	**0**	**123.294**
Risk margin	0	0	70	0	0	0	0	**10.161**
Amount of the transitional on Technical Provisions								
TP as a whole	0	0	0	0	0	0	0	**0**
Best estimate	0	0	0	0	0	0	0	**0**
Risk margin	0	0	0	0	0	0	0	**0**
Technical provisions - total								
Technical provisions - total	**0**	**1**	**1.244**	**0**	**0**	**0**	**0**	**148.877**
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	**0**	**-2**	**51**	**0**	**0**	**0**	**0**	**15.421**
Technical provisions minus recoverables from reinsurance/SPV and Finite Re- total	**0**	**3**	**1.193**	**0**	**0**	**0**	**0**	**133.455**

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

	Development Year (absolute amount)																In Current year	Sum of years (cumulative)
	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15 & +		
Prior																8	8	0
2002	7.321	6.094	1.885	938	444	469	-182	90	2	86	36	20	138	6	128		128	17.475
2003	6.379	3.285	937	177	312	77	258	428	17	334	11	2	0	1			1	12.217
2004	7.616	3.191	1.012	265	100	904	190	134	16	64	298	169	66				66	14.026
2005	10.027	5.730	719	225	807	566	449	111	145	193	26	111					111	19.109
2006	12.353	7.785	1.031	509	1.415	97	254	410	21	-7	334						334	24.201
2007	19.710	6.371	1.159	557	1.118	860	124	50	224	-568							-568	29.605
2008	17.030	21.296	2.218	2.755	1.432	1.654	1.418	795	303								303	48.901
2009	27.240	7.018	1.711	1.904	817	671	884	376									376	40.621
2010	14.366	7.514	2.029	2.424	1.409	1.029	499										499	29.271
2011	12.244	7.052	1.208	866	722	295											295	22.387
2012	13.063	8.281	1.316	628	571												571	23.859
2013	12.382	14.084	1.488	561													561	28.515
2014	11.402	7.455	1.558														1.558	20.415
2015	17.882	9.025															9.025	26.907
2016	17.160																17.160	17.160
																	30.427	**374.669**

Gross undiscounted Best Estimate Claims Provisions (absolute amount)

	Development Year (absolute amount)																Year end (discounted data)
	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15 & +	
Prior																346	344
2002	0	0	0	0	0	0	0	0	0	0	0	0	0	0	131		130
2003	0	0	0	0	0	0	0	0	0	0	0	0	0	104			102
2004	0	0	0	0	0	0	0	0	0	0	0	0	374				369
2005	0	0	0	0	0	0	0	0	0	0	0	1.103					1.089
2006	0	0	0	0	0	0	0	0	0	0	2.074						2.043
2007	0	0	0	0	0	0	0	0	0	3.435							3.388
2008	0	0	0	0	0	0	0	0	5.538								5.471
2009	0	0	0	0	0	0	0	6.267									6.177
2010	0	0	0	0	0	0	6.400										6.318
2011	0	0	0	0	0	7.427											7.334
2012	0	0	0	0	14.394												14.225
2013	0	0	0	10.573													10.456
2014	0	0	12.194														12.067
2015	0	13.150															13.019
2016	29.249																28.987
																	111.520

E. Capital Management

E.1. OWN FUNDS

E.1.1. POLICIES AND PROCESSES RELATED TO OWN FUNDS MANAGEMENT, INFORMATION ON THE TIME HORIZON USED FOR BUSINESS PLANNING AND ON ANY MATERIAL CHANGES OVER THE REPORTING PERIOD

The Group and Local Capital Management Policy define principles for Capital Management activities the Assicurazioni Generali S.p.A. and the Group Legal Entities in scope must adhere.

Capital management activities refer to Own Funds management and control and in particular to procedures to:

- classify and periodically review Own Funds in order to guarantee that Own Funds items meet the requirements of the applicable capital regime both at issuance and subsequently
- regulate issuance of Own Funds according to the medium-term Capital Management Plan and Strategic Plan also to guarantee that Own Funds are not encumbered, that all actions required or permitted related to the governance of the Own Funds are timely completed, that ancillary Own Funds are timely called, that terms and conditions are clear and unambiguous, including instances in which distributions on an Own Funds item are expected to be deferred or cancelled
- ensure that any policy or statement in respect of ordinary share dividends is taken into account when analyzing the capital position
- establish driving principles and common standards to carry out these activities efficiently, in compliance with the relevant regulatory requirements and legislative frameworks at Group and Local level, and in line with the stated risk appetite and strategy of the Generali Group.

The Group Capital Management Policy after being approved by the Board of Directors of Assicurazioni Generali S.p.A. (on December 2016) has to be approved by the relevant body at entity level.

The Capital Management Plan represents a part of overall three-year Strategic Plan and this ensures the consistency of the CMP with three-year Strategic Plan assumptions, which include inter alia:

- financial scenarios
- strategic asset allocation
- business mix. and includes a detailed description of the development of Own Funds and Regulatory Solvency Ratio from the latest available actual figures to the last plan year figures.

CFO is responsible to produce CMP and CEO is responsible to submit them to the relevant AMSB. Furthermore, Generali Hellas should include the Capital Management Plan in the information package to be delivered to the GSPC&IR in the planning process. The main elements of the Capital Management Plan are discussed and challenged in specific meetings (Deep Dives on Capital) and within the QBR process.

If extraordinary operations (i.e. M&A, Own Funds issuance) are foreseen in the plan period, their impact is explicitly included in the Own Funds and Regulatory Solvency Ratio development and further details are included in the relevant documentation. Own Funds issuances are explicitly included in the CMP with a detailed description of the rationale.

The description of the development of Own Funds explicitly includes the issuance, redemption or repayment (earlier or at maturity) of Own Funds items and their impacts on the limits on tiers. Any variation in the valuation of Own Funds items is also indicated, with additional qualitative details in terms of limits on tiers when needed.

The CMP is defined taking into account limits and tolerances set in the Risk Appetite Framework.

In the CMP any transitional measure has to be reported in terms of impact on the solvency position current and at the end of the transitional period (both at Group and Local level), duration and general features including their absorption capacity in times of stress.

In case the three year Strategic Plan needs to be resubmitted to the Head Office due to a significant variation of Own Funds or SCR also the CMP has to be accordingly updated and sent to the GSPC&IR function.

E.1.2. AMOUNT AND QUALITY OF ELIGIBLE OWN FUNDS

ELIGIBLE OWN FUNDS TO MEET SCR

Generali Hellas SA Basic Own funds consists all available Own Funds due to the fact that there are neither Ancillary Own funds nor deductions as described in the theoretical framework reported in the chapter "D. 5. 1. OWN FUNDS: legislative framework and definition". All Eligible Own funds fall under Tier 1 – Unrestricted category as reported in the table below:

Available Own funds by tiering

(€ thousand)	Total available own funds to meet the SCR	Tier 1 – unrestricted	Tier 1 - restricted	Tier 2	Tier 3
Current Year	81.781	81.781	0	0	0

Eligible Own funds by tiering

(€ thousand)	Total eligible own funds to meet the SCR	Tier 1 – unrestricted	Tier 1 - restricted	Tier 2	Tier 3
Current Year	81.781	81.781	0	0	0

(€ thousand)	Current year
Own Funds	81.781
Solvency Capital Requirement	60.823
Solvency Ratio	**134,46%**

BASIC OWN FUNDS

The amount of Own Funds split by legislative requirement (QRT S.23.01 view) are the following:

(€ thousand)	Amount
Ordinary share capital (gross of own shares)	22.776
Share premium account related to ordinary share capital	9.080
Surplus funds	
Preference shares	
Share premium account related to preference shares	
Reconciliation reserve (see below table)	49.924
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	
Deductions for participations in financial and credit institutions	
Total basic own funds after deductions	**81.781**

Own funds by Tiers

(€ thousand)	Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
Ordinary share capital (gross of own shares)	22.776	22.776			
Share premium account related to ordinary share capital	9.080	9.080			
Surplus funds					
Preference shares					
Share premium account related to preference shares					
Reconciliation reserve (see below table)	49.924	49.924			
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					
Deductions for participations in financial and credit institutions					
Total basic own funds after deductions	**81.781**	**81.781**			

RECONCILIATION RESERVE AND EPIFP

In the following table, the reconciliation reserve is determined starting from MVBS excess of assets over liabilities:

Reconciliation reserve

(€ thousand)	Amount
Assets – Liabilities (from Annex D)	**81.781**
Own shares	
Foreseeable dividends and distributions	
Other basic own fund items	31.857
Restricted own fund items due to ring fencing	
Reconciliation Reserve	49.924

To satisfy the needs of having a representation of quality of Own Funds, the following table should be filled-in:

Expected Profit in Future Premiums

(€ thousand)	Amount 2016
Expected Profit included in future premiums (EPIFP) - Life Business	6.107
Expected Profit included in future premiums (EPIFP) - Non Life Business	
Total Expected Profit included in future premiums (EPIFP)	**6.107**

RECONCILIATION BETWEEN STATUTORY SHAREHOLDER FUNDS AND OWN FUNDS FOR SOLVENCY PURPOSES

The reconciliation between equity as shown in financial statements and the excess of assets over liabilities as calculated for solvency purposes is presented in the table below:

(€ thousand)		Amount 2016
Statutory Equity		63.920
Statutory Capital reserves and other reserves		31.857
Of which:		
	Share capital	22.776
	Capital reserves	9.080
	Other equity instruments	
	Reserve for currency translation differences	
	Own shares	
Statutory Revenue reserves		32.064
Of which		
	Revenue reserves	20.555
	Reserve for unrealized gains&losses on AFS financial assets	7.872
	Reserve for other unrealized gains and losses through equity	-1.430
	Result of the period	5.067
Adjustment on Intangible		-496
Adjustment on Investment		5.666
Adjustment on Net Technical Provision		19.986
Adjustment on Financial and Subordinated debt		
Adjustment on Other Items		
Adjustment on Deferred Taxes		-7.295
Excess of Assets over Liabilities		81.781

E.1.3. ELIGIBLE OF OWN FUNDS TO MEET THE MINIMUM CAPITAL REQUIREMENT

With regard to the legislative framework described in chapter "D. 5. 1. OWN FUNDS: legislative framework and definition" all Eligible Own Funds of Generali Hellas SA are able to meet the MCR under Tier 1 – unrestricted category.

Eligible Own funds by tiering

(€ thousand)	Total eligible own funds to meet the MCR	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2
Current Year	81.781	81.781	0	0

E.1.4. REGULATORY FRAMEWORK

IMPLEMENTING MEASURES

The solvency and financial condition report shall include all of the following information regarding the own funds of the insurance or reinsurance undertaking:

I. information on the objectives, policies and processes employed by the undertaking for managing its own funds, including information on the time horizon used for business planning and on any material changes over the reporting period

II. separately for each tier, information on the structure, amount and quality of own funds at the end of the reporting period and at the end of the previous reporting period, including an analysis of the significant changes in each tier over the reporting period

III. the eligible amount of own funds to cover the Solvency Capital Requirement, classified by tiers

IV. the eligible amount of basic own funds to cover the Minimum Capital Requirement, classified by tiers

V. a quantitative and qualitative explanation of any material differences between equity as shown in the undertaking's financial statements and the excess of assets over liabilities as calculated for solvency purposes

VI. for each basic own-fund item that is subject to the transitional arrangements referred to in Articles 308b(9) and 308b(10) of Directive 2009/138/EC, a description of the nature of the item and its amount;

VII. for each material item of ancillary own funds, a description of the item, the amount of the ancillary own-fund item and, where a method by which to determine the amount of the ancillary own-fund item has been approved, that method as well as the nature and the names of the counterparty or group of counterparties for the items referred to in points (a), (b) and (c) of Article 89(1) of Directive 2009/138/EC.

VIII. For the purposes of paragraph VII, the names of the counterparties shall not be disclosed where such disclosure is legally not possible or impracticable or where the counterparties concerned are not material."

IX. a description of any item deducted from own funds and a brief description of any significant restriction affecting the availability and transferability of own funds within the undertaking

2015 GUIDELINES ON REPORTING AND PUBLIC DISCLOSURE

Own funds – Additional solvency ratios

1.25. Under section "E.1 Own funds" of the SFCR as defined in Annex XX of the Delegated Regulation, where undertakings disclose additional ratios to the ones included in template S.23.01, the SFCR should also include an explanation on the calculation and meaning of the additional ratios.

EXPLANATORY TEXT: 2.47. The eligible own funds / SCR ratio is easy to calculate and reveals whether or not an undertaking meets the SCR. While no single solvency ratio can deliver all the solvency information users might find relevant, the chosen ratio is considered the most useful ratio."

"Own funds – Information on the structure, amount, quality and eligibility of own funds

1.26. Under section "E.1 Own funds" of the SFCR as defined in Annex XX of the Delegated Regulation, insurance and reinsurance undertakings should, regarding their own funds, describe at least the following information:

- for each material own fund item set out in Article 69, Article 72, Article 74, Article 76 and Article 78, as well as for items that received supervisory approval as per Article 79 of the Delegated Regulation the information required in Article 297 (1) of the Delegated Regulation, distinguishing between basic and ancillary own fund items
- for each material own fund item, the extent to which it is available, subordinated, as well as its duration and any other features that are relevant for assessing its quality
- an analysis of significant changes in own funds during the reporting period, including the value of own fund items issued during the year, the value of instruments redeemed during the year, and the extent to which the issuance has been used to fund redemption
- in relation to subordinated debt, an explanation of the changes to its/ their value
- when disclosing the information required in Article 297 (1) (c) of the Delegated Regulation, an explanation of any restrictions to available own funds and the impact of limits on eligible Tier 2 capital, Tier 3 capital and restricted Tier 1 capital
- details of the principal loss absorbency mechanism used to comply with Article 71 (1)(e) of the Delegated Regulation, including the trigger point, and its effects
- an explanation of the key elements of the reconciliation reserve

- for each basic own fund item subject to the transitional arrangements:
  - ✓ the tier into which each basic own fund item has been classified and why
  - ✓ the date of the next call and the regularity of any subsequent call dates, or the fact that no call dates fall until after the end of the transitional period.
- when disclosing the information required in Article 297(1)(g) of the Delegated Regulation, information on the type of arrangement and the nature of the basic own funds item which each ancillary own fund item would become on being called up or satisfied, including the tier, as well as when the item was approved by the supervisory authority and, where a method was approved, for how long
- where a method has been used to determine the amount of a material ancillary own fund item, undertakings should describe:
  - ✓ how the valuation provided by the method has varied over time
  - ✓ which inputs to the methodology have been the principal drivers for this movement
  - ✓ the extent to which the amount calculated is affected by past experience, including the outcome of past calls.
- Regarding items deducted from own funds:
  - ✓ the total excess of assets over liabilities within ring-fenced funds and matching adjustment portfolios, identifying the amount for which an adjustment is made in determining available own funds
  - ✓ the extent of and reasons for significant restrictions on, deductions from or encumbrances of own funds.

EXPLANATORY TEXT:

2.48. Member States have different accounting practices, and the specific circumstances of individual undertakings within a Member State will also vary. Both these facts will affect the nature and extent of the explanations provided by individual undertakings.

2.49. The mechanism to be used, including the trigger point, is clearly defined in the terms of the contractual arrangement governing the own-fund item and legally certain. Details of the mechanism and its effects are included in public disclosure so that all providers of own funds items are aware of the potential impact.

2.50. Disclosure of items which reduce the reconciliation reserve such as foreseeable dividends and own shares held is always considered appropriate.

2015 GUIDELINES ON REPORTING AND PUBLIC DISCLOSURE

Information on own funds - groups

Under section “E.1 Own funds” of the group SFCR as defined in Annex XX of the Delegated Regulation, participating insurance and reinsurance undertakings, insurance holding companies and mixed financial holding companies should, regarding the group’s own funds, describe at least the following information:

- The own funds items that have been issued by an undertaking of the group other than the participating insurance and reinsurance undertaking, insurance holding company or mixed financial holding company
- Where material own funds are issued by an equivalent third country insurance or reinsurance undertaking included via the Deduction and Aggregation method, if the Member State allows the use of local rules, the 17/108 local tiering of those own funds items, including information on the tiering structure, criteria and limits
- Where material own funds items are issued by an undertaking that is not an insurance or reinsurance undertaking and is subject to tiering requirements other than the Solvency II requirements, the source and nature of those tiering requirements, as well as the level of the own funds in each tier
- How group own funds have been calculated net of any intra-group transactions, including intra-group transactions with entities of other financial sectors
- The nature of the restrictions to the transferability and fungibility of own funds items in the related undertakings, if any.

E.2. SOLVENCY CAPITAL REQUIREMENT AND MINIMUM CAPITAL REQUIREMENT

E.2.1. SCR AND MCR VALUES

The Directive 2009/138/EC and the Delegated Regulation (EU) 2015/35 describe the process to be followed by the companies applying the Standard Formula approach, defined by EIOPA.

SCR Values

(€ thousand)	Life		Non-Life		Total	
	Total	Undiversified Impact (%)	Total	Undiversified Impact (%)	Total	Diversified Impact (%)
Current Year	16.633	24%	52.897	76%	60.823	100%

MCR Values

(€ thousand)	Life		Non-Life		Total	
	Total	Impact (%)	Total	Impact (%)	Total	Impact (%)
Current Year	4.802	20%	19.652	80%	24.454	100%

The calculation of the Minimum Capital requirement is based on the Standard Formula methodology and combines a linear formula with a floor of 25% and a cap of 45% of the SCR. The Company respected those thresholds and no regulatory capital add-on needed to be made. The company has calculated the notional non-life and life MCR, as required for the composite companies. The notional MCR for the non-life business included information related to the technical provisions after deduction of the amounts recoverable from reinsurance contracts and net written premiums during the last 12 months per each line of business. The notional MCR for the life business included information related to the technical provisions of life business after deduction of the amounts recoverable from reinsurance contracts and the total capital at risk. A different factor is applied to obligations with profit participation, Unit-Linked products, future discretionary benefits and all the other life insurance obligations, according to the SII Directive.

The Solvency Capital requirement is based on the Standard Formula methodology, as well. Some simplifications have been used in the counterparty default risk calculation and more precisely in the Type 1 exposures. According to article 111 of the Delegated Regulation, the risk mitigation effect has been estimated as the difference between the hypothetical and the actual underwriting risks. The risk mitigation effect for reinsurance arrangements has been proportionally distributed to each reinsurer based on their technical provisions and the reinsurance treaty in which they participate. The non-life and health underwriting risks have been calculated using the corresponding parameters of the standard formula and no use of Undertaking Specific Parameters has been made.

E.2.2. SCR BREAKDOWN

The table below presents the total BSCR and SCR for the current year end for each sub-module before and after diversification. The sub risks included are those presented in the Company's Risk map based on the Solvency II Directive. Additional information related to the amount of the operational risk and the tax absorbing capacity is included.

Total SCR split by Risk before and after diversification (Figures in €/mln)

Total SCR split by Risk before and after diversification

(€ thousand)	Before Diversification		After Diversification	
	Total	Impact (%)	Total	Impact (%)
nSCR before Diversification	**77.999**	**100%**		
Market Risks	14.961	19,18%	8.232	14,74%
Counterparty Default Risks	17.082	21,90%	12.716	22,77%
Life Underwriting Risks	5.757	7,38%	1.502	2,69%
Health Underwriting Risks	3.196	4,10%	724	1,30%
Non-Life Underwriting Risks	37.003	47,44%	32.661	58,50%
Intangible	0	0%	0	0%
Diversification benefit	-22.165			
nBSCR after Diversification	**55.835**		**55.835**	**100%**
Operational Risk	5.988			
Notional SCR arising from RFF	0			
Total SCR before Taxes	**61.822**			
Tax absorption	-999			
Total SCR	**60.823**			

E.3. USE OF THE DURATION-BASED EQUITY RISK SUB-MODULE IN THE CALCULATION OF THE SOLVENCY CAPITAL REQUIREMENT

The Company does not use the duration based equity risk sub module in the calculation of the Solvency Capital Requirements.

E.4. NON-COMPLIANCE WITH THE MINIMUM CAPITAL REQUIREMENT AND NON-COMPLIANCE WITH THE SOLVENCY CAPITAL REQUIREMENT

The Company has a sound solvency position, no issues related to the compliance neither with the Minimum Capital Requirements nor with the Solvency Capital Requirement.

E.5. ANY OTHER INFORMATION

SENSITIVITIES

As anticipated in chapter C.7, the sensitivity analyses of simple changes in specific risk drivers (e.g. Interest Rates, equity shock and credit spreads) measuring the variability of the Own Funds and Solvency Ratio to variations in specific risk factors are here reported. The set chosen aims to provide the assessment of resilience to the most significant risks.

In relation to Own Funds impact, the table below presents the Own Funds per each sensitivity scenario, as they were disclosed during the annual analyst meeting at Group level.

Apart from the Own Funds, the Solvency Capital requirement has also been estimated for each sensitivity scenario and the impact is illustrated below. The calculation of the SCR has been made outside Tagetik system, using the dedicated tool provided by the HO for Pillar 1 purposes and the input data have been modified according to each sensitivity scenario.

The impact of Solvency Ratio is seen below.

Scenario		Own Funds	Solvency Capital Requirement	SCR ratio
Risk Free Rate: interest rate change	+50 bps	80.805	60.595	133,4%
	-50 bps	83.007	61.187	135,7%
Credit spread of corporate bonds on Swap	+100 bps	79.526	62.483	127,3%
Equity Price fair value change	+20%	82.406	60.763	135,6%
	-20%	81.155	60.887	133,3%
Risk Free rate with No Volatility adjustment	no VA	80.512	61.502	130,9%
Ultimate Forward rates	-50 bps	81.785	60.927	134,2%

Annex

QRT TEMPLATES VALID FOR SOLO PURPOSES

Impact of long term guarantees measures and transitional

	Amount with Long Term Guarantee measures and transitionals	Impact of transitional on technical provisions	Impact of transitional on interest rate	Impact of volatility adjustment set to zero	Impact of matching adjustment set to zero
Technical provisions	315.663	0	0	1.857	0
Basic own funds	81.781	0	0	-1.269	0
Eligible own funds to meet Solvency Capital Requirement	81.781	0	0	-1.269	0
Solvency Capital Requirement	60.823	0	0	678	0
Eligible own funds to meet Minimum Capital Requirement	81.781	0	0	-1.269	0
Minimum Capital Requirement	24.454	0	0	97	0

Own funds – Solo (1/3)

	Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35					
Ordinary share capital (gross of own shares)	22.776	22.776	0	0	0
Share premium account related to ordinary share capital	9.080	9.080	0	0	0
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	0	0	0	0	0
Subordinated mutual member accounts	0	0	0	0	0
Surplus funds	0	0			
Preference shares	0	0	0	0	0
Share premium account related to preference shares	0	0	0	0	0
Reconciliation reserve	49.924	49.924			
Subordinated liabilities	0	0	0	0	0
An amount equal to the value of net deferred tax assets	0	0			0
Other own fund items approved by the supervisory authority as basic own funds not specified above	0	0	0	0	0
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds					
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	0	0	0	0	0
Deductions					
Deductions for participations in financial and credit institutions	0	0	0	0	0
Total basic own funds after deductions	**81.781**	**81.781**	**0**	**0**	**0**

Own funds – Solo (2/3)

	Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
Ancillary own funds					
Unpaid and uncalled ordinary share capital callable on demand	0	0	0	0	0
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	0	0	0	0	0
Unpaid and uncalled preference shares callable on demand	0	0	0	0	0
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	0	0	0	0	0
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	0	0	0	0	0
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	0	0	0	0	0
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	0	0	0	0	0
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	0	0	0	0	0
Other ancillary own funds	0	0	0	0	0
Total ancillary own funds	**0**	**0**	**0**	**0**	**0**
Available and eligible own funds	**81.781**	**81.781**	**0**	**0**	**0**
Total available own funds to meet the SCR	**81.781**	**81.781**	**0**	**0**	**0**
Total available own funds to meet the MCR	**81.781**	**81.781**	**0**	**0**	**0**
Total eligible own funds to meet the SCR	**81.781**	**81.781**	**0**	**0**	**0**
Total eligible own funds to meet the MCR	**81.781**	**81.781**	**0**	**0**	**0**

Own funds – Solo (3/3)

	Total
SCR	**60.823**
MCR	**24.453**
Ratio of Eligible own funds to SCR	**134,5%**
Ratio of Eligible own funds to MCR	**334,4%**
Reconciliation reserve	
Excess of assets over liabilities	81.781
Own shares (held directly and indirectly)	0
Foreseeable dividends, distributions and charges	0
Other basic own fund items	31.857
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	0
Reconciliation reserve	**49.924**
Expected profits	
Expected profits included in future premiums (EPIFP) - Life Business	6.107
Expected profits included in future premiums (EPIFP) - Non- life business	0
Total Expected profits included in future premiums (EPIFP)	**6.107**

MCR Result for non-life activities

	Non-life activities	Life activities
	$MCR_{(NL,NL)}$ Result	$MCR_{(NL,L)}$ Result
Linear formula component for non-life insurance and reinsurance obligations	**19.652**	**0**

Linear formula component for non-life insurance and reinsurance obligations

MCR calculation Non Life	Non-life activities		Life activities	
	Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months	Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
Medical expense insurance and proportional reinsurance	0	0	0	0
Income protection insurance and proportional reinsurance	415	2.508	0	0
Workers' compensation insurance and proportional reinsurance	0	0	0	0
Motor vehicle liability insurance and proportional reinsurance	49.420	36.814	0	0
Other motor insurance and proportional reinsurance	6.040	11.337	0	0
Marine, aviation and transport insurance and proportional reinsurance	1.251	3.183	0	0
Fire and other damage to property insurance and proportional reinsurance	16.764	22.463	0	0
General liability insurance and proportional reinsurance	48.278	8.920	0	0
Credit and suretyship insurance and proportional reinsurance	0	0	0	0
Legal expenses insurance and proportional reinsurance	0	0	0	0
Assistance and proportional reinsurance	3	1.185	0	0
Miscellaneous financial loss insurance and proportional reinsurance	1.122	1.093	0	0
Non-proportional health reinsurance	0	0	0	0
Non-proportional casualty reinsurance	0	0	0	0
Non-proportional marine, aviation and transport reinsurance	0	0	0	0
Non-proportional property reinsurance	0	0	0	0

MCR Result for life activities

	Non-life activities	Life activities
	$MCR_{(L,NL)}$ Result	$MCR_{(L,L)}$ Result
Linear formula component for life insurance and reinsurance obligations	**0**	**4.802**

Linear formula component for life insurance and reinsurance obligations

MCR calculation Life	Non-life activities		Life activities	
	Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk	Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
Obligations with profit participation - guaranteed benefits	0	0	111.472	0
Obligations with profit participation - future discretionary benefits	0	0	253	0
Index-linked and unit-linked insurance obligations	0	0	23.372	0
Other life (re)insurance and health (re)insurance obligations	0	0	17.075	0
Total capital at risk for all life (re)insurance obligations	0	0	0	241.146

Overall MCR

	Overall MCR calculation
Linear MCR	24.454
SCR	60.823
MCR cap	27.370
MCR floor	15.206
Combined MCR	24.454
Absolute floor of the MCR	7.400
Minimum Capital Requirement	**24.454**

Notional non-life and life MCR calculation

	Non-life activities	Life activities
Notional linear MCR	19.652	4.802
Notional SCR excluding add-on (annual or latest calculation)	48.879	11.944
Notional MCR cap	21.995	5.375
Notional MCR floor	12.220	2.986
Notional Combined MCR	19.652	4.802
Absolute floor of the notional MCR	3.700	3.700
Notional MCR	19.652	4.802