ERGO Life Insurance SE
Financial Year 2025

ERGO
Simple because it matters.

Solvency and Financial Conditions Report

Contents

Summary

This Solvency and Financial Condition Report (SFCR) provides a comprehensive overview of the business performance, system of governance, risk profile, valuation practices and capital management of ERGO Life Insurance SE (hereinafter also referred to as ERGO or the Company) for the financial year 2025. The report has been prepared in accordance with the requirements of the Solvency II regulatory framework and aims to present a transparent view of the Company's financial position and risk management practices.

ERGO operates in the Baltic region, with its headquarters in Lithuania and branches in Latvia and Estonia. The Company is fully owned by ERGO International AG and is part of the Munich Re Group. ERGO offers life and health insurance products and maintains a diversified distribution network across the Baltic markets.

In 2025, the Company demonstrated solid growth in its core business. Insurance revenue amounted to EUR 73.66m, representing an increase of 12.1% compared to the previous year. Health insurance remains the dominant line of business, accounting for 63.9% of total revenue, while life insurance contributes 36.1%. Growth was observed across all Baltic markets, reflecting stable demand and continued development of the product portfolio.

Investment management continues to follow a conservative strategy aligned with the Company's asset–liability management principles. In 2025, the Company achieved an overall investment yield of 2.54%, supported primarily by interest income and dividend income. The portfolio remains focused on maintaining adequate liquidity, diversification and alignment with liability structures.

The system of governance is designed to ensure effective and prudent management of the Company, taking into account the nature, scale and complexity of its operations. The governance framework includes clearly defined roles and responsibilities across the General Meeting of Shareholders, Supervisory Board and Management Board, supported by specialised committees and independent key functions. During 2025, changes occurred within governance structures, including updates to the composition of management and supervisory bodies.

Risk management is embedded into all business processes and is implemented in accordance with the three lines of defence model. The Company applies a structured risk management framework covering risk identification, assessment, monitoring and reporting. The Own Risk and Solvency Assessment (ORSA) forms a central element of this framework and supports strategic decision-making and capital planning.

The Company's risk profile is primarily driven by underwriting risks, particularly those related to mortality, longevity, morbidity and expense assumptions. In addition, market risks, credit risks, liquidity risks and operational risks contribute to the overall risk exposure. Risk-free rate fluctuations remain a key driver affecting underwriting risk and capital requirements. The Company also monitors non-modelled risks, including strategic, reputational and emerging risks.

Assets and liabilities for solvency purposes are valued in accordance with Solvency II principles. Technical provisions are calculated as the sum of the best estimate and a risk margin, ensuring that the Company holds sufficient reserves to meet its obligations. The valuation framework reflects an economic view of the balance sheet and supports sound risk management.

Capital management focuses on maintaining a strong solvency position and ensuring compliance with regulatory requirements. The Company calculates its Solvency Capital Requirement (SCR) using the standard formula and continuously monitors its capital adequacy. The results of the ORSA process are integrated into capital planning to ensure that the Company remains resilient under both normal and stressed conditions.

Overall, ERGO Life Insurance SE considers its governance system, risk management framework and capital position to be appropriate and effective. The Company remains committed to prudent risk management, sustainable growth and maintaining financial stability in a dynamic and evolving risk environment.

As of the compilation of this report, the financial results have not undergone final auditing procedures.

This Solvency and Financial Condition Report for the financial year 2025 was approved by the Management Board of ERGO Insurance on 07.04.2026.

Major developments

There are a number of risk drivers and causes which are also be significant, but which cannot be clearly classified in the risk categories of standard formula These include for instance concentration risks, compliance violations or additional regulatory requirements. In general, these are assigned to the category that is most severely affected or are presented in this subchapter.

Uncertainties in dealing with artificial intelligence (AI)

The importance of artificial intelligence (AI) continues to grow as technological development advances and digital transformation accelerates across almost all sectors. AI has become one of the most significant technological trends shaping modern business environments. In the insurance industry, AI offers substantial opportunities to transform processes, enhance decision-making, and improve customer experience.

For ERGO, the use of AI presents considerable potential to increase operational efficiency, strengthen competitiveness, and support innovation across various business functions. AI technologies can assist in areas such as claims processing, risk assessment, fraud detection, customer service, and data analysis, enabling faster and more accurate outcomes.

At the same time, the deployment of AI technologies is associated with specific risks. These risks are particularly relevant in relation to the information security and integrity of the data, as well as the growing threat of cyber attacks. Potential threats to information and data security are regarded as one of the central challenges associated with AI adoption.

In particular, within the areas of information security and data protection, insufficient contractual, technical, or organizational safeguards may lead to vulnerabilities in data management. Such weaknesses could result in data loss, incorrect automated decisions, breaches of confidentiality—including the unintended transfer of confidential data to third countries—disruptions to business operations, or reputational damage.

To mitigate these risks, ERGO prioritizes the protection of key information security objectives: confidentiality, availability, authenticity, and integrity. These principles represent the core pillars for safeguarding information assets and technological systems. Within an increasingly complex risk landscape, ERGO pays particular attention to emerging challenges related to AI technologies, including the potential spread of disinformation and the misuse of AI-generated content.

Furthermore, the often-limited transparency and traceability of AI-generated outputs may increase operational and reputational risks. Without adequate governance and oversight, these risk factors could negatively affect trust in AI-driven processes and the reputation of the organization. For this reason, it is essential that robust governance frameworks, effective risk management processes, and appropriate technical and organizational safeguards are implemented. These measures help ensure that AI is used responsibly, risks are properly controlled, and the established security objectives are maintained.

Geopolitical conflicts and wars

The deterioration of a world order based on cooperation and agreements has further increased geopolitical tensions and escalation of armed conflicts. In addition to the continuous military conflict between Russia and Ukraine, increasing tensions between Iran, Israel and the United States are contributing to a more complex and volatile international security environment. Tensions between the United States administration and EU and NATO members have increased instability in Europe security even further.

Escalating confrontations in the Middle East, including military incidents, regional proxy conflicts, and the risk of broader escalation between Iran and Israel, may further increase geopolitical instability. The involvement or strategic positioning of the United States in the region adds another dimension to these tensions, with potential implications for global security and economic stability. These developments may increase uncertainty and volatility in global capital and energy markets. Potential disruptions to energy supply routes, particularly in strategically important regions such as the Strait of Hormuz, could affect global oil and gas prices and place additional pressure on national economies.

At the same time, geopolitical tensions and the possibility of additional sanctions or countermeasures between countries may create indirect economic consequences. Such developments could affect financial markets, international trade, and

cross-border investments, potentially influencing the broader risk environment for companies. Furthermore, heightened geopolitical tensions are often accompanied by increased cyber activity and information campaigns, which may raise operational risks, including cyber risks and disinformation threats.

Given the evolving geopolitical environment, it remains important for organizations to closely monitor international developments and assess potential impacts on financial markets, economic stability, and operational risk exposure.

Sustainability risks

We define sustainability risks as all events or conditions relating to the environment, social issues or corporate governance, the occurrence of which may have actual or potential significant negative impacts on the net assets, financial position and results of operations, as well as on the reputation of our company. In our company, we counter sustainability risks by systematically considering ESG criteria in our insurance business, investments, procurement activities and our own operations.

In doing so, we distinguish between the perspectives of so-called “dual materiality”: on the one hand, we consider the impact on the environment (“inside out”), and on the other hand, the impact of the environment (“outside in”).

Sustainability risks are seen as a sub-aspect of the known risk categories. We do not see a separate risk category for sustainability risks, as sustainability risks have an impact on the other risk categories, and it would hardly be possible to distinguish them in a meaningful way. Sustainability risks are comprehensively managed in our risk management cycle as part of the original risk, i.e. the other risk categories. Sustainability risks are integrated into risk management and the overall risk management process in the same way as other risk categories.

Our parent company Munich Re provides the basic strategic framework for sustainability issues. At ERGO the ESG organization and governance principles are following:

ESG Team – Governance, Responsibility and Delegated Functions			
ESG Governance Area		**Responsibility**	**ERGO Function**
ESG Strategy, Management	Baltics	ESG Strategic decisions, top-level governance	Members of the Board – Estonia, Latvia, Lithuania
Sustainability / ESG Governance	Baltics	Sustainability / Governance of all ESG activities and process coordination	Sustainability Officer
Environmental Management	Local / Baltics	Environmental Management System	Country Administration Department
Social Management	Local / Baltics	Diversity, Equity, Inclusion and other Social Areas	Human Resource Department
ESG Communication	Local / Baltics	ESG Awareness, Trainings, Customer Campaigns	Sustainability Officer / Communication Department
Corporate Governance	Local / Baltics	ESG risk management, legislation, reporting, project management etc.	Corresponding ERGO Departments

Figure 1 ERGO Insurance SE ESG organization and governance principles

The Code of Conduct, which applies to all employees of the ERGO, creates a common understanding of values across the company and thus contributes to appropriate corporate governance. This is also achieved through corresponding Compliance regulations. In August 2025, the company also adopted and implemented “Directive for Mitigating Greenwashing Risks” and “Policy to mitigate the risk attached to ESG-related statements”, which strengthens ERGO governance activities towards reduction of potential greenwashing risks.

We also comply with domestic and international environmental protection laws, as well as other binding obligations and self-commitments to environmental protection. We stand by the Principles of Sustainable Insurance (PSI) and the Principles of Responsible Investments (PRI).

ERGO takes into account the social dimension (“S”) of sustainability in its own operations, in particular by promoting diversity, equality and inclusion as part of the DIE (Diversity, Equity & Inclusion) initiative. ERGO relies on measures such as training and workshops as well as networks in the divisions to promote a diverse and inclusive workforce. The protection of human rights (also in connection with the Supply Chain Due Diligence Act) is also firmly established, through the introduction of the Supply Chain Due Diligence (Human Rights) Guideline.

With regard to the ecological dimension (environment) of sustainability, climate change remains the key sustainability risk. Climate-related risks can also have a connection with emerging risks, which we also consider. Sustainability risks occur in the form of physical and transition risks, whereby there are interdependencies between the two types of risk.

In summary, we consider our structures, processes and methods for dealing with sustainability risks to be appropriate. In order to effectively address sustainability risks in the long term, two factors are of particular relevance: the ability to adapt our business activities and assessment models to a changing environment (strategic risk) and the credibility with which we consistently implement our sustainability strategies (reputational risk).

A. Business and Performance

A.1 Business objectives

ERGO Life Insurance SE is operated in the legal form of societas Europaea, a public company registered in accordance with the corporate law of the European Union. ERGO is operating in the Baltic countries, with the headquarters in Lithuania and branches in Estonia and Latvia.

The Company is 100% owned by ERGO International AG, Germany, which is part of the ERGO Group AG, Germany, which in turn is part of the Munich Re Group (Münchener Rückversicherungs-Gesellschaft AG, Munich). ERGO Group is one of the major insurance groups in Germany and Europe, offering a comprehensive spectrum of insurance services.

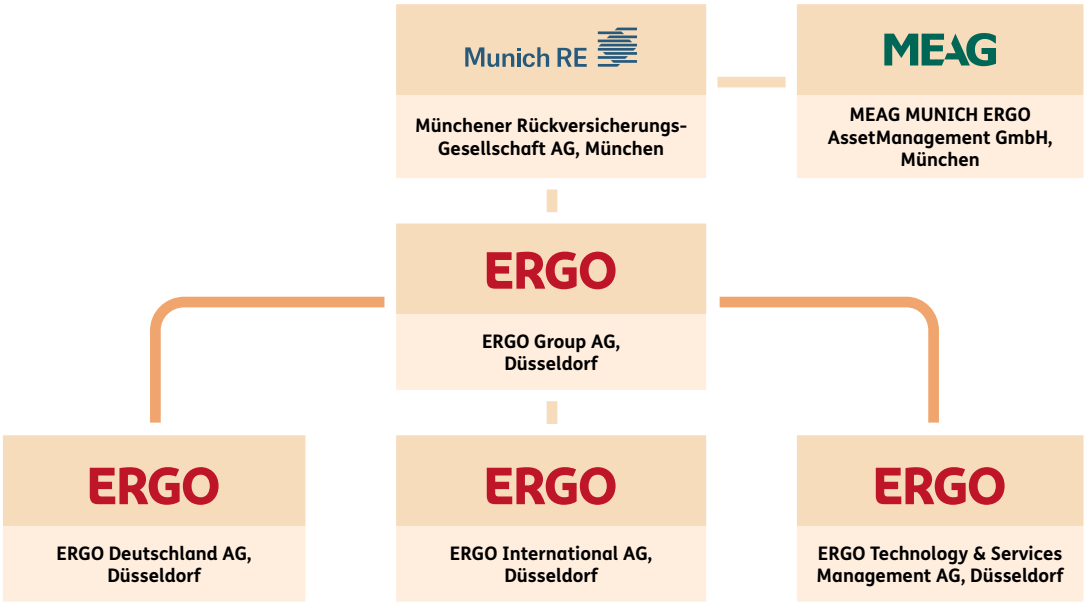

Figure 2 Structure of Munich Re and ERGO Group AG

ERGO operates with a multi distribution channel approach and can rely on own extensive and country wide sales networks in Latvia, Estonia and Lithuania. ERGO's material lines of business are Life insurance and Health Insurance.

The responsible supervisory authority for the company is Bank of Lithuania (Lietuvos bankas), Gedimino pr. 6, LT-01103 Vilnius. The company is audited by Ernst & Young Baltic UAB Aukštaičių g. 7, LT-11341 Vilnius, Lithuania.

The responsible supervisory authority for the Munich Re and ERGO Groups is the Federal Financial Supervisory Authority (Bundesanstalt für Finanzdienstleistungsaufsicht, BaFin), Graurheindorfer Str. 108, 53117 Bonn.

Related undertakings – 100 per cent of the shares of the company ERGO Invest SIA, Limited Liability Company, Latvia.

A.2 Underwriting Performance

A.2.1 Overview of Underwriting Performance

In 2025, ERGO generated insurance revenue of EUR 73.66m, a 12.1% increase on the year before. The largest classes according to the IFRS17 standard were life VFA/GMM insurance contracts and health PAA insurance, the revenue of which amounted to EUR 26.55m or 36.1% and EUR 47.10m or 63.9% of the portfolio respectively.

Information reported in the tables are according to IFRS17 which is Company's local GAAP.

euros	2024		2025		Change	
	Insurance Revenue	Share of class, %	Insurance Revenue	Share of class, %	Insurance Revenue	Share of class, pp
Life insurance contracts	22 750 427	34.6%	26 554 486	36.1%	3 804 059	16.7%
Health insurance contracts	42 969 210	65.4%	47 104 745	63.9%	4 135 535	9.6%
Total	65 719 637	100.0%	73 659 231	100.0%	7 939 594	12.1%

Table 1: Insurance revenue by line of business

euros	2024	2025
Lithuania	18 838 826	22 727 684
Latvia	39 019 680	41 923 232
Estonia	7 861 131	9 008 315
Total from insurance activities	**65 719 637**	**73 659 231**

Table 2: Insurance revenue by countries

A.3 Investment Performance

A.3.1 Overview of Investment Performance

Strategic investment management is the responsibility of the company's asset and liability management team, which includes specialists from Baltic states and Germany. In line with the investment management system, tactical investment management has been outsourced to an external service provider. Since 1st of October 2020, immediate contact for company in all investment related matters is GIM – Group Investment Management department of Munich RE, which delivers the service in accordance with the strategic investment management plan and risk profile approved by the Management Board of ERGO Life Insurance SE.

In 2025 company maintained conservative investment approach whereas income on assets with interest rate risk amounted to EUR 2.95m. Realisation of debt securities produced a profit of EUR 0.13m. The fair value reserve decreased by EUR 1.2m while fair value reserve through profit and loss statement decreased by 1 thousand euros. Dividend income and income from loans amounted to EUR 2.98m. Investment management expenses accounted for 0.16% of the carrying value of managed investments. Thus, the overall yield of the investment portfolio was 2.54 %.

A.3.2 Gains and losses recognized directly in equity

The fair value reserve comprises the net change in the fair value of available-for-sale financial assets. When a financial asset is derecognized, the cumulative gain or loss previously recognized in equity is recognized in profit or loss.

euros	2024	2025
As at 1 January	**-9 487 917**	**- 8 929 855**
Derecognised from equity and recognised in profit or loss in connection with sale and impairment	3 241	-110 656
Derecognised from equity and recognised in profit or loss in connection with redemption and impairment	0	4 896
Net change in fair value recognised in other comprehensive income or expense during the year	554 822	-1 138 864
Transition effect from implementation of IFRS9		
As at 31 December	**- 8 929 855**	**-10 174 479**

Table 3: Gains and losses recognized directly in equity.

A.4 Performance of other activities

Other income contains fees, commissions, and charges received; interests received from intragroup loans; rental income; and other income not related to insurance activities. Overall, compared to the previous period, the structure of other income remained unchanged in 2025.

Other expenses include membership fees to the Financial Supervision Authority and professional associations; audit and legal fees; insurance brokerage expenses; write-offs and other expenses not related to insurance activities. The increase observed in 2025 in other expenses is mainly attributable to the write-off of software in Latvia.

euros	2024				2025			
Other activities	**Estonia**	**Latvia**	**Lithuania**	**Total**	**Estonia**	**Latvia**	**Lithuania**	**Total**
Other income	79 200	165 645	143 203	388 048	29 536	168 055	134 564	332 154
Other expenses	345 409	797 357	926 706	2 069 472	371 273	1 037 903	1 026 945	2 436 121
Total result	-266 209	-631 712	-783 503	-1 681 424	-341 737	-869 848	-892 381	-2 103 967

Table 4: Other income and expenses

A.5 Any other information

As of 1 January 2025, Lithuania introduced a security contribution of 10% on certain insurance premiums. For life insurance, the contribution is applied exclusively to health-related products, while long-term savings and investment-linked life insurance products are exempt. This regulatory change is intended to support national defence funding. The Company continues to monitor the financial impact of the contribution on its operations and results.

As of 1 January 2025, amendments to tax incentives came into force in Lithuania, under which the non-taxable amount of employer-paid health insurance has been reduced to EUR 350 per employee per year.

B. System of Governance

B.1. General information on the system of governance

As the main registered office of ERGO is in Lithuania, the company must comply with European Union laws (f. e. Solvency II directive), Lithuanian Law on Insurance as well as Lithuanian Law on Companies and relevant regulations, approved by Lithuanian Financial Supervisory Authority (the Central Bank of the Republic of Lithuania).

ERGO has functional and administrative structures aimed at supporting the strategic objectives and operations. Structures will be adapted to changes in the strategic objectives, operations or in the business environment. The organizational and operational structure of ERGO is considered appropriate for the complexity and size of operations and the business strategy.

The Company continuously develops and improves the efficiency of its management and operational processes while keeping in mind the Company's strategic goals and the reasonableness criteria. The Company's shareholder, Supervisory and Management bodies strive to ensure transparent, reliable and prudent management of the Company by creating an efficient and transparent organizational structure, risk management and internal control, information, monitoring and response systems.

The Supervisory Board is a control body of the Management Board, the duties and functions of these bodies are clearly defined and separated. The Supervisory Board oversees the company and its management organ activity, whereas the Management Board's primary responsibility is company management. The Supervisory Board and the Management Board in order to ensure a level of control that corresponds scale and complexity of the company's business and operations, establish committees whose function is to assist the Supervisory Board and Management Board to implement their tasks.

ERGO has following management bodies:

- General meeting of shareholders;
- Supervisory Board (consists of 5 members, each elected for a term of 3 years);
- Management Board (consists of 5 members, each elected for a term of 5 years);
- Managing Director of ERGO;
- There are established following Committees: AML strategic committee, AML Operational Committee; Operational Sanction Committee, Asset/Liability Team, Unit Link Investment committee, Fit & Proper committee, Compensation Committee, Procurement Committee, Audit Committee.

B.1.1 Management Board duties and responsibilities

The Company is managed by the Management Board. The Management Board is responsible for managing the Company, setting objectives and determining strategy. In doing so, it is obliged to safeguard Company interests and endeavour to achieve a long-term increase in the Company's value. The Management Board must ensure compliance with statutory requirements and internal company regulations and is responsible for effecting adequate risk management and risk control in the Company.

Management Board is acting in accordance with Rules of Procedure of the Management Board of ERGO.

The Management Board constitutes a council from the Management Board members, to whom the business management has been assigned. Duties are properly allocated between Management Board members, taking also into account the aim to avoid conflict of interest. The performance of its activities requires a sufficient presence in the Company.

The Management Board members are elected by the Supervisory Board. The Management Board members elect one from among themselves to be the Chairman/Chairwoman of the Management Board (also called here CEO).

The branches of the Company are managed by the branch managers. Branch manager is one of the Management Board Members. The branch managers are appointed by the Management Board. All terms applicable for Management Board Members according to the current procedure are applicable for Branch Managers also.

The Management Board members are jointly responsible for the management of the Company and compliance with legal requirements. Notwithstanding this overall responsibility, the individual members independently head the departments assigned to them. There are divisional responsibilities for business segments as well as functional responsibilities.

On the basis of the Supervisory Board's decision, as of 1st of January 2025, Laimė Naruševičienė was appointed, as a member of the Management Board.

Management Board members as at the end of 2024 were:

- Ursula Clara Deschka – Chairwoman of the Management Board.
- Marek Ratnik – Management Board member.
- Tadas Dovbyšas – Management Board member
- Aija Medne – Management Board member
- Laimė Naruševičienė – Management Board member

The roles and responsibilities of the members of the Management Board until 31.12.2025 were as follows:

- Chairwoman of the Management Board (CEO) Ursula Clara Deschka is responsible for the following areas: Internal Audit (only administrative reporting), Communication; HR and office administration; Legal and Compliance (Anti-Fraud); Management Board Office; Governance; Health underwriting, product development, pricing and reinsurance. She is acting as Managing Director of ERGO Life.
- Member of the Management Board (CFO) Laimė Naruševičienė responsible for Accounting; Actuary P&C; Actuary Life & Health; Risk Management incl. Information Security; Sustainability; Planning & Controlling; Procurement in the Baltics.
- Member of the Management Board (CUO Life and CIO) Aija Medne is responsible for the following areas: Life product development; Pricing and analytics; Reinsurance; Underwriting& portfolio management; AML (including financial sanctions); IT; Investments. She is also a branch manager of ERGO Life Insurance SE branch in Latvia.
- Member of the Management Board (CDO) Tadas Dovbyšas is responsible for Sales (Distribution) in Life & Health in the Baltics and Digital, Marketing &CX.
- Member of the Management Board (CUO P&C) Marek Ratnik is responsible for P&C insurance operations in the Baltics (underwriting, product development, pricing and analytics, reinsurance, claims). He is also a branch manager of ERGO Life Insurance SE branch in Estonia.

Internal regulation, working procedure and delegation of tasks

Members of the Management Board work together in a spirit of collegiality and inform each other of all business procedures of particular significance within the responsibility of a member of the Management Board, and of such business procedures which affect, or may affect, the responsibility of another member of the Management Board.

In view of the requirement of a consistent business management the Management Board members (including Branch Managers of Company's Branches) conduct their business area independently and on their own responsibility. Any matters of fundamental importance shall be presented to the Management Board for information and/ or deciding. Any matters having impact on another business area shall be decided between the responsible members of the Management Board. In case if the Management Board members are of contrary opinions, final decision shall be taken by the CEO.

In order to ensure the necessary coordination, the matters to be discussed and/or decided by the Management Board are discussed regularly during the Management Board meetings and information Sharing meetings. These are called by the Chairwoman of the Management Board.

Management Board has also established internal signature rights for signing insurance contracts and for disbursement of claims.

There are also special decrees on determining signature rights of executives on concluding agreements for goods and services and approving invoices.

B.1.2 Supervisory Board

The Supervisory Board of the company is a collegial body supervising the activities. The Supervisory Board of the company consists of 5 members. It is elected by the Company's general meeting of shareholders for a 3-year term. The Supervisory Board oversees and advises the Board of Management on managing the business. It is also responsible, in particular, for appointing the members of the Management Board, appoints and dismisses the Head of the internal audit, determining the overall remuneration for the Management Board members, succession planning for the Management Board and reviewing the annual financial statements of the Company.

The Supervisory Board also appoints the external auditor for the Company and Group financial statements and for the half-year financial report.

The members of the Supervisory Board shall be elected and removed by the General Meeting of the Shareholders. In order to elect a member of the Supervisory Board, his or her written consent is required.

The Members of the Supervisory Board are obliged to act in the Company's interest and when making decisions may neither pursue personal interests nor make use of the Company's business opportunities for their own purposes.

Meetings of the Supervisory Board shall be held when necessary but not less frequently than once every three months. The Chairman summons the meeting of the Supervisory Board.

As of the 17th of January 2025 ERGO Life Insurance SE shareholder elected Theodoros Kokkalas and Dominique Godin, as the new members of the Supervisory Board as from the 17th of January 2025 who replaced Oliver Martin Willmes and Christine Kaaz.

At the end of 2025 members of the Supervisory Board were:

- Theodoros Kokkalas – member and chairman of the Supervisory Board;
- Maximilian Happacher – member of the Supervisory Board;
- Ilona Mihele – member of the Supervisory Board;
- Dirk Christoph Schautes – member of the Supervisory Board;
- Dominique Godin – member of the Supervisory Board.

The Supervisory Board has established its own rules of procedure, specifying responsibilities, work processes and required majorities. It has also adopted separate charter for the Audit Committee.

B.1.3 Committees

The Asset Liability Team (AL-Team)

The Asset Liability AL-Team is responsible for the annual development (conception and resolution) of the strategic asset allocation (SAA) proposal and the resulting mandate (once a year and as needed) based on the liabilities structure, required rate of return, desired risk appetite. AL-Team is also responsible for developing of risk management proposal in risk situations.

Fit and Proper Committee

The Fit and Proper Committee is responsible for the initial and ongoing assessment of Persons who effectively run the business and other key persons prior to an appointment and on an ongoing basis, as well as a description of the situations that give rise to a reassessment of the fit and proper requirements.

Audit Committee

The Audit Committee is an advisory body to the Supervisory Board on matters relating to accounting, auditing, risk management, internal control and internal audit, supervision, budgeting and compliance.

Compensation Committee

The Compensation Committee ensures that the decisions made by Compensation Policy are in line with the business and risk management strategy, its risk profile, objectives, risk management practices and the long-term interests and performance of the Company as a whole (sustainable remuneration), and shall incorporate measures aimed at avoiding conflicts of interest; ensuring that remuneration principles consider equal treatment on employees (incl. gender diversity, etc); review of all material and relevant changes of the remuneration system in the Company and for the further development of the remuneration system; monitoring the market situation and draw conclusions on possible changes.

AML Strategic Committee

The AML Strategic Committee seeks to ensure effective and consistent ML/TF risk management and oversight of AML/CTF activities/ processes across ERGO (oversee management of ML/TF risks, monitor the risks; review and address, as appropriate, ERGO ML/TF risk assessment results.

AML Operational Committee

The Committee scope covers operations that are subject to the AML/CTF requirements in accordance with applicable AML/CTF laws and regulations; operations of the third-parties which are not regulated, supervised or monitored for AML/CTF, but to whom ERGO outsources a part of their AML/CTF function, including the distribution of the products (the "Agents"), i. e. when the Agents apply the customer due diligence (the "CDD") measures on be-half of ERGO in accordance with ERGO procedures and processes; AML/CTF related measures of the operational nature.

Operational Sanction Committee

The Committee's scope includes Company operations subject to sanctions requirements under applicable sanctions laws and regulations, as well as sanctions-related actions of an operational nature.

Unit-linked Investment Committee

The Committee is the body, which is authorized to decide on the offered unit-linked life insurance funds, inclusion/exclusion of funds in/from the Fund List, proposition of Investment Programs and fund selection criteria. The tasks and responsibilities are to review the performance, quality and flows in/out of the funds in the List; to review and approve Fund List Proposal and/or Investment Programs Proposal; to approve which funds to include/exclude into/from the List and/or Programs; to review and decide on the changes in fund selection or diversification criteria (e. g. geographical markets to be covered) including approval of exceptions from criteria if any required; to review interest rates, which are used in performance calculations and provided to customers in offers before contract conclusion.

Procurement Committee

The Procurement Committee ensure consistent and correct application of procurement practices.

B.1.4 Key functions

In accordance with the Solvency II Directive, ERGO has the following **four key functions**:

- Actuarial function
- Compliance function
- Internal audit function
- Risk Management function

Key functions are incorporated into the organizational structure in a way which ensures that each function is free from influences that may compromise the function's ability to undertake its duties in an objective, fair and independent manner. All key functions also satisfy a range of requirements, such as fulfilling the "fit and proper" requirements, complying with certain reporting and remuneration requirements.

B.1.4.1 Actuarial function

The Head of the Actuarial department, which is acting as Appointed Actuary, is the key function holder and part of the second line of defence in relation to reporting, oversight and controlling activities as well as the use of reinsurance.

The Actuarial function performs tasks that are based on regulatory and business requirements and consist of coordination and calculation of technical reserves for accounting and regulatory purposes and other controlling and reporting figures.

The Actuarial Function also supports the Risk Management Function by expressing opinions on key aspects of the business and its operation; contributing to methodologies, models and assumptions used for the assessment of risk and contributing to the overall risk management processes.

The role of the Actuarial Function in ERGO is to measure, manage, and mitigate risks by using statistical models and analysis to enhance the understanding of risks assumed. Actuaries also provide advice on the adequacy of risk assessment, reinsurance arrangements, investment policies, capital levels and stress testing of the future financial condition of these companies.

For more information please see chapter B.7 for details.

B.1.4.2 Compliance function

The Head of Legal and Compliance is the Chief Compliance officer and the key function holder who leads the Compliance function, which is part of the second line of defence. The Compliance function is responsible for oversight, detection, prevention and advice with respect to the compliance risk areas of the Company and contributes to the effective implementation of the internal control system. The Compliance function is designed to supplement the responsibility of the Board and of senior management to ensure compliance with legislation and applicable guidelines.

The main objectives of the Compliance function are:

- Support and monitor compliance with applicable laws, regulations and administrative provisions to protect the Company against compliance risks. This includes the identification, assessment and mitigation of these risks.
- Advise senior management, the Board and its Committees on compliance risks, including compliance with laws, regulations and administrative provisions and assess the possible impact of any changes in the legal environment on the Company's operations.

As part of the internal control system, the Compliance function establishes and maintains an adequate and effective compliance management system. For more information please see chapter B.5 for details.

B.1.4.3 Internal Audit

The Internal Audit is the internal audit function of ERGO. Internal Audit performs its tasks independently, objectively and under its own responsibility.

Internal Audit supports the Supervisory Board in overseeing, steering and controlling all operations and activities at ERGO. Internal Audit is only directed by the Supervisory Board with regards to the execution of the audit plan and requesting of ad-hoc audits. Please see chapter B.6 for details.

B.1.4.4 Risk Management function

The Risk Management Function is an integral part of ERGO's corporate management with regard to achieving the goal of turning risk into value. The Risk Management Function is the main operating unit responsible for implementing the risk management system, which is part of the second line of defence. Its main purpose is to assist the ERGO Management Board to effectively implement an affective risk management system and integrate it into business operations. In this respect, the risk management system is understood as meaning the entirety of all measures, on an individual or aggregate basis, serving the regular identification, assessment, monitoring and management of risks taken or potential risks as well as reporting on these. Please see chapter B.3 for details.

B.1.5 Compensation policy

ERGO Compensation guidelines set the transparent and common compensation system, that facilitates the implementation of Company strategy and effective risk management as well as equal treatment for pay opportunities. The Company has a compensation system that applies to all employees. Such a system ensures that the Company can attract and retain employees who strive for the best results, develop, learn and share knowledge.

The Company's compensation system is transparent and performance-based in a way that is considered fair and predictable as much as possible. The salary paid corresponds to the agreed results. The bases and principles of determining the remuneration and other office related benefits of employees are:

- clear, transparent and in compliance with prudent and efficient risk management principles;
- based on the business strategy and values of the Company, taking into consideration the economic performance of the insurance undertaking and the legitimate interests of the policyholders, insured persons and beneficiaries;
- take into consideration the long-term objectives of the Company in view of its ability to cope with the changes in the external environment.

The remuneration system is based on two main principles – internal fairness and external competitiveness.

Based upon the legal framework and regulations as well as best human resources practices, the most important principles described by norms are:

- To attract, motivate and retain employees and to ensure a competitive level of compensation;
- To provide transparency and consistency in the application of compensation principles in the company, and to ensure a solid foundation for open internal communication;
- To ensure compliance with relevant international and national regulatory requirements, including Solvency II, and alignment with prudent and efficient risk management principles;
- To ensure compensation principles that are consistent with the long-term strategy of the Company, the corresponding risk strategy and appetite;
- To ensure compensation principles that are consistent with and promote sound and effective risk management.
- To ensure equal treatment of employees in terms of their compensation. This also includes the ensuring equal pay for the same position or positions of equal value, it is also necessary to ensure equal opportunities for all genders.

Exact conditions of the compensation of Management Board members are set by the Shareholder's authorized person and are reflected in the individual Management Agreement of each Member of the Management Board.

The compensation shall not be considered as a wage or any other similar payment, which could be connected with the Management Board Member's subordination to the Company or depending solely on the profit (loss) earned by the Company.

The main principle for determining compensation for employees is the classification of positions and market value. All positions are divided into levels according to the required level of knowledge, problem solving decision and responsibility, clear payment principles, conditions, rules and salary review procedures are established. The compensation system is based on two main principles – internal fairness and external competitiveness. All job positions in the Company are classified according to methodology of Compensation survey provider principles and updated annually. The service providers for the countries are Korn Ferry (for Lithuania – Hay methodology) and Figures (for Estonia and Latvia) . The Hay methodology or Figures uses analytic methods to evaluate job requirements by means of defined evaluation criteria. The approach of job evaluation is related to job position not person.

ERGO applies a total compensation approach. The total compensation contains only fixed compensation (including control/ key function employees), with the exceptions for Sales unit executives (2nd and 3rd managerial level) and employees having direct sales/sales support responsibility, and recourse lawyers in Claims Handling unit in Estonia and Latvia.

The variable compensation depends on results but does not encourage taking unreasonable and/or risks beyond the level acceptable to the Company. The variable part of the salary is not guaranteed, it can be completely free, if the employee, the department and/or the Company did not achieve the goals or did not fulfil their tasks.

The fixed compensation is determined on the basis of position and respective salary range, considering also personal professional experience, responsibility, job complexity, local market conditions.

Management Board Member receives as a remuneration for his/her activities as a Management Board Member an annual gross fee set forth in the individual Management Agreement (incl. vacation period).

B.1.6 Other benefits

The Company provides an attractive social package for its employees, which includes additional vacations, trainings, insurances, compensations related to employees' health and personal (family) life, recognition for length of service, etc.

Employees are given the opportunity to work flexibly and partly from the home office.

In case the Management Board member agreement specifies it, the Company provides each Management Board member with a retirement benefit at the rate of 5% from 69% of the fixed remuneration. The payments to the pension scheme shall be made throughout the duration of the Management Agreement upon submission of the corresponding agreement.

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Shares are not part of the compensation system. Currently, there are no employees in the Company who are allocated shares or are subject to pension or early retirement schemes.

B.1.7 Material transactions during the reporting period with shareholders, with persons who exercise a significant influence on the undertaking, and with members of the administrative, management and supervisory bodies

There were no significant transactions during the reporting period.

B.2 Fit and proper requirements

The Fit and Proper Policy of ERGO documents the criteria and procedures to be applied in order to ensure that all persons who effectively run ERGO or are responsible for other key and important functions within ERGO, at all times meet the "fit and proper" requirements under regulatory laws based on or resulting from the implementation of the Solvency II framework. The Fit & Proper Guideline of the Company describes the overall process and principles to meet the regulatory "fit and proper" requirements.

Persons to whom the fit and proper requirements apply:

- Members of the Management Board of ERGO;
- Members of the Supervisory Board of ERGO;
- Managers of ERGO branches;
- Head of the Internal audit function;
- Head of the Compliance function;
- Head of the Risk management function;
- Head of the Actuarial function;
- Persons who are key function executors (all employees who are performing key functions in actuarial, compliance, internal audit, risk management, including ISO – Information Security Officer in Baltics;
- Separately agreed positions: MLRO for Baltic – Head of Money Laundering prevention department and his/her deputy and Deputy of CFO.

B.2.1 Fitness requirements

A Key Person is considered "fit" if his/her relevant professional and formal qualifications, knowledge and experience within the insurance sector, other financial sectors or other businesses are adequate to enable sound and prudent management as well as to perform the tasks assigned to them in an orderly manner. The respective duties allocated to that Key Person and, where relevant, his/her knowledge and experience in insurance, finance, accounting, actuarial affairs, regulatory framework and management skills need to be taken into account.

The specific fitness requirements further depend on the particular tasks and the responsibilities assigned to a person performing them.

The persons to whom the duties of competence and fitness evaluation apply, must have appropriate comprehensive professional qualifications, knowledge and relevant experience to be able to professionally manage and supervise the Company – both individually and collectively. It is also required that their reputation be perfect.

The ERGO Board Members collectively shall possess at least qualifications, experience and knowledge about the following:

- Insurance and financial markets;
- the business strategy and business model;
- the system of governance;
- financial and actuarial analysis;
- the regulatory framework and requirements and the internal model (risk model), if applicable, and management.

The respective duties allocated to the individual member shall ensure appropriate diversity of qualifications, knowledge and relevant experience to ensure that the Company is managed and overseen in a professional manner. When changes occur within the Management Board of ERGO the collective qualifications, experience and knowledge of the ERGO Board Members are maintained at an adequate level at all times.

Members of the Supervisory Board must always have the experience and knowledge required to exercise appropriate control over and supervise the Management Board, and actively oversee the development of the Company. In order to fulfil that function, they must understand the business conducted by the Company and be able to assess the risks for the Company. Members of the Supervisory Board must be familiar with laws and regulations of relevance to the undertaking. Collectively, the Members of the Supervisory Board must as a minimum possess knowledge in the areas of investment, underwriting/ actuarial practice and accounting.

Persons who have other key functions must have theoretical and practical knowledge required for the respective key function and must be able to demonstrate relevant experience with applicable professional and other standards.

B.2.2 Propriety requirements

A Key Person is considered "proper" if he/she is of good repute and integrity. Inadequate propriety is presumed if generally based on person's character, personal behaviour and business conduct (in any jurisdiction), including any criminal, financial, supervisory aspects, the assumption is justified that hat such circumstances could affect the sound and prudent exercise of their mandate or function. Account is taken of the personal and professional conduct of the Person concerned regarding to criminal, financial, proprietary and regulatory law. Of particular relevance are criminal or administrative offences, other imposed sanctions to the person and circumstances related with it, especially if in connection with corporate activities and breach of legal requirements related to the mandate or the function in question.

The proper requirement also includes Key Persons being expected to avoid, to the extent possible, activities that could create conflicts of interest or the appearance of such conflicts of interest. Key Persons are generally bound by ERGO's best interests and, accordingly, may not pursue personal interests in their decision-making or utilize business opportunities for personal gain.

Each person concerned must be considered as "proper". No proportionality can be applied for the propriety requirements because, irrespective of the nature, scale and complexity of the risks associated with the business of the entity, the reputation and integrity of a person concerned must always be at the same appropriate level.

B.2.3 Assessment of fitness and propriety

The assessment must be of the individual's competence and suitability is carried out prior to appointment carried out prior to a first appointment, election, or assignment of responsibility to perform duties, also periodically by the corresponding Fit and Proper Committee.

Persons whose fitness and propriety are assessed must inform the Company of any changes that may affect them compliance with fitness and propriety requirements.

- Fitness and propriety assessment is carried out based on at least the following information: Candidate ID;
- Employment history and references (CV);
- Education (proved by certificate);
- The presented Questionnaires;
- Certificate of (non)criminal record from a competent authority;

When changes occur within the Management or Supervisory Board the collective qualifications, experience and knowledge maintained at an appropriate level at all times. Therefore, the collective fitness assessment is always performed in cases of changes on Management or Supervisory Board set up.

The assessment of fitness and propriety of each Supervisory Board member is performed by the Supervisory Board, however it is supported by the report presented by Legal & Compliance on the Assessment of the Supervisory Board members in compliance with the Fit and Proper requirements under the external and internal requirements.

When assessing the propriety of Key Persons, their honesty and financial soundness shall be assessed based on evidence regarding their character, personal behaviour and business conduct, including any criminal, financial or supervisory concerns regardless of location.

While criminal convictions, disciplinary or administrative measures or past misconduct are significant, the assessment must be carried out on a case-by-case basis. Hence, consideration must be given to the type of misconduct or conviction, the level of appeal (definitive/final vs. non-definitive/non-final convictions), the lapse of time since the misconduct or conviction, its severity and the Key Person's subsequent conduct.

B.2.4 Reassessment

The fitness and propriety of the Key Persons shall be reassessed on an ongoing basis by the responsible Fit and Proper Committee.

Each Key Person is obliged to contribute to the maintenance of his/her fitness by actively searching for and taking on opportunities to improve their professional qualifications, knowledge and experience.

Reassessment is organized in such cases as:

- indications, that the Key Person might not fulfil the criteria;
- the initial assessment was inaccurate;
- additional or new information which after assessment gives reason to believe that fitness or propriety requirements might not be met anymore by that key person;
- the renewal of a contract if the key person is a Management Board member;
- significant changes in the duties allocated to the key function;
- five years have passed since the last assessment.

The need for reassessment is monitored regularly.

B.3 Risk management system including the own risk and solvency assessment

B.3.1 Description of risk management system

As part of the Munich Re Group, ERGO is committed to turning risk into value. Risk management is an integral part of our corporate management with regard to achieving this goal. Risk management includes all strategies, methods and processes to identify, analyse, assess, control, monitor and report the short- and long-term risks ERGO faces or may face in the future.

Risk management is performed at all levels of ERGO Group and is organized according to the three "lines of defence": risk takers (1st line), Risk Management Function including Information Security Officer, Actuarial Function, Compliance Function (2nd line), and Internal Audit Function (3rd line).

Risk management is seen as an enterprise-wide discipline by which Company identifies, assess, measures, steers, monitors and reports risks from all potential sources for the purpose of achieving our risk management objectives. The diagram below shows the risk management cycle areas and associated key tasks.

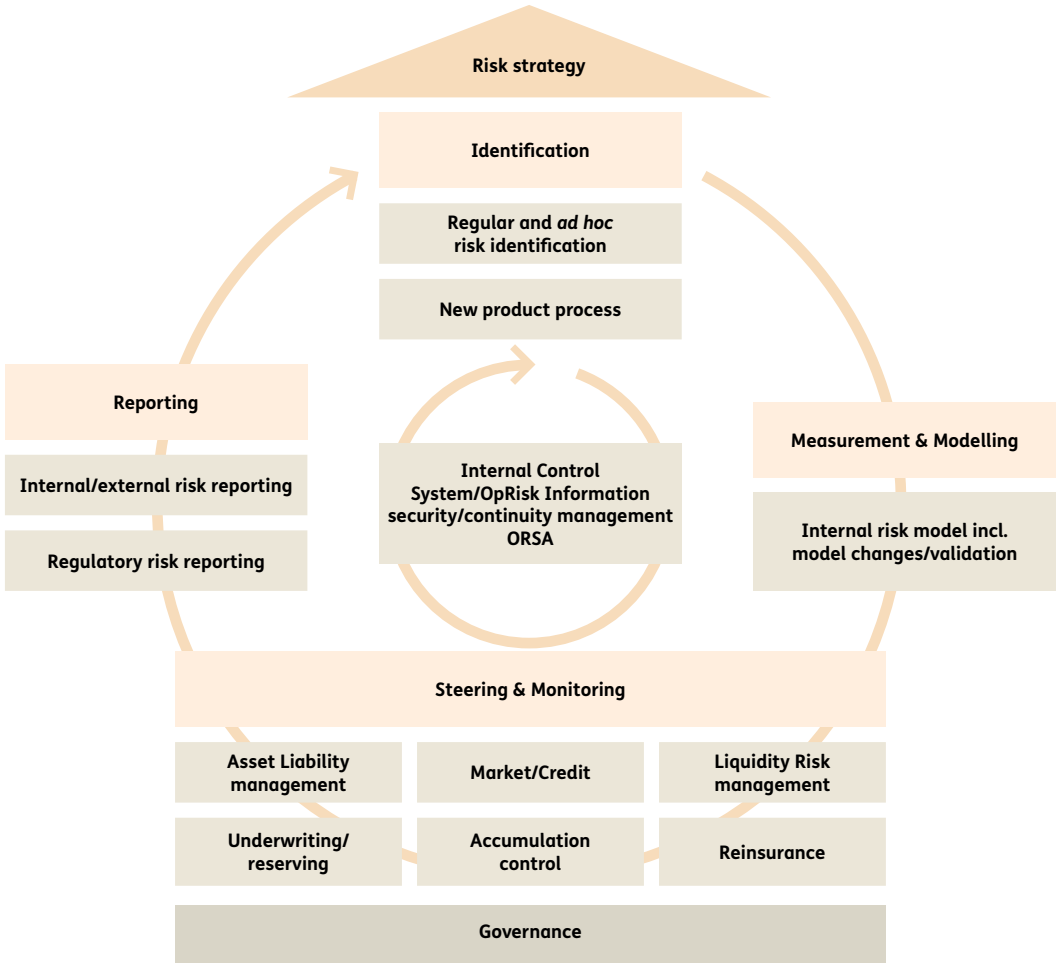

Figure 3 Risk Management Cycle /areas

B.3.2 Risk strategy

ERGO may be exposed to potentially large losses triggered by a single cause or event, as a consequence of exposures from different lines of business, across fields of business, or across the balance sheet. We manage concentration risk for such exposures with our risk strategy which complements our business strategy.

The risk strategy complements our business strategy. It describes the extent to which a risk is desirable and, consequently, whether it is acceptable or must be mitigated through risk limits or budgets, risk controls or risk transfer.

The development of the risk strategy is closely aligned with the annual business planning cycle. It starts with a check of actual year-end exposures against tolerances and an initial proposal of tolerances for the next planning year, including an indication of likely exposure bottlenecks and free risk-bearing capacity for strategic asset liability mismatch risk. It concludes with a recommendation of operational limit and trigger amounts, by group/segment or company level, in order to ensure that strategic risk tolerances are respected. Subsequently, the Management Board approves the risk strategy.

To implement and operationalize the risk strategy, a system of relevant risk criteria, limits and triggers are defined. This is described for the ERGO Group and its entities in the “Risk Limit and Trigger Manual for ERGO Group AG” (ERGO RLTM). ERGO Integrated Risk Management department (IRM) has the overall responsibility for the content of the document and ensures that It Is reviewed and updated annually in line with the framework set by Munich Re’s RLTM. ERGO also annually reviews and updates the respective norms.

B.3.3 Risk identification

The risk identification and reporting processes are critical components of an effective risk management framework. They are interlinked and ensure that all potential risks are recognised, assessed, and communicated promptly to facilitate informed decision-making.

Risks are systematically and consistently identified on a regular (quarterly or annually) as well as on an ad hoc basis. Internal and external changes impacting the business strategy and business objectives also need to be considered. This includes interfaces with the new product/product development process, the internal control system, information security and compliance, and business continuity management.

Risk identification is conducted through a top-down and bottom-up approach, where new risks are identified, and existing risks are (re)evaluated.

The regular risk identification process is initiated and coordinated by Risk Management function. The risk takers (1st line of defense) are responsible for using the methodology established by risk management function to identify risks and to verify previously identified risks within their respective area of responsibility.

B.3.4 Risk assessment and measurement

Based on the results from the risk identification, risks can be quantified or assessed qualitatively. The frequency of the assessment may differ depending on the nature of the risk and the significance of a single risk or group of risks.

ERGO uses the standard formula for risk quantification. For all risks covered by the standard formula, the (sub) module results are used in general as basis for the risk quantification. Risks that are not modelled (e. g. strategic risks, reputational risks, liquidity risks and emerging risks) are evaluated qualitatively with specific assessment methods.

Stress tests and scenario analyses are implemented where appropriate. There are several methods how to implement the analysis, depending on risk type (quantifiable vs. non-quantifiable), time horizon (trend vs. instant) and valuation methods.

B.3.5 Risk steering and monitoring

Risk steering measures aim to reduce the probability of the risk occurring or the financial impact and resulting losses and should ensure the achievement of business objectives. The measures have to be within the scope of the risk bearing capacity and relevant regulatory and group requirements (risk strategy, risk management policy and other applicable standards). In general, risks can be taken/accepted, mitigated, transferred or terminated.

We manage risks through underwriting guidelines, tools and processes, investment controlling, and a new product introduction process. The risk appetite and specific risk tolerances are detailed by the RLTM and the Risk Management Policy, which describes risk criteria per risk type and specifies limit and trigger amounts.

Within the meaning of an early warning system, the limits and triggers are regularly observed by the respective risk takers and are contained in the regular risk reporting. Appropriate measures are defined and approved by the responsible management.

Risk monitoring focuses on the risk profile and takes into account the respective risk limits, risk triggers, risk accumulation and interdependencies. Not only is the risk profile itself monitored but also the implementation of risk strategy, the risk relevant methods and processes as well as the overall management of risks. Additionally, the overall solvency position is continuously monitored taking into account the results of the SCR calculation and the risk bearing capacity.

The methods for risk monitoring include comparison of actual with target, analysis of the efficiency of risk measures, analysis of the results of the risk profile analysis and performance measures as well as the monitoring of existing controlling figures linked to risk management. Escalation processes have been defined for limit breaches and are also documented in the RLTM.

The system of Key Risk Indicators ensures early recognition of risks and prepares proposals for suitable countermeasures. Key Risk Indicators focus on risks that could have a sizeable adverse impact on the business or the company and are reported to the Management Board quarterly.

B.3.6 Risk reporting

To ensure continuous monitoring, a regular reporting process is established. The Risk Management Function reports to the Management Board at least on a quarterly basis. Input is gained from a variety of sources such as bottom-up risk assessments, ad-hoc reports, internal audit reports, operational risk event reporting, early warning reporting, quarterly solvency calculations, company results, as well as discussions with the management. The internal risk report contains information about the key risks the company is exposed to and should enable management to evaluate the current risk profile and decide on necessary steering measures.

In case of a significant change in the risk situation, an immediate reporting to the company's management is carried out. The ad-hoc risk reporting process complements the regular risk reporting processes thus ensuring that new risks or significant changes to existing risks are reported comprehensively and swiftly. This report includes an appropriate risk analysis and assessment. Ad-hoc reporting on arising risks is to ensure that the parties involved are informed and – where necessary – appropriate measures to steer and control the risk have been initiated.

B.3.7 Description of Risk Management Function

Methods, standards, processes and policies are defined by ERGO IRM in line with the overall Munich Re Group framework. The local risk management function is responsible for implementing the IRM methodology on a legal entity level. The Management Board of the Company is ultimately responsible for risk management.

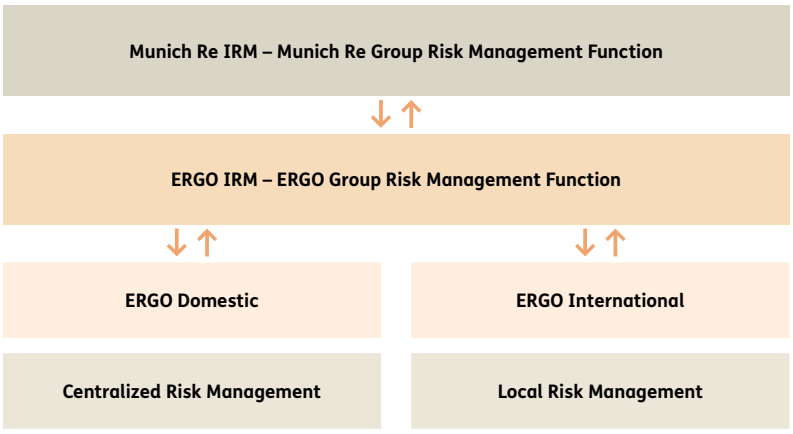

Figure 4: Risk Management Organization with in Munich Re and ERGO Group

In ERGO the Risk Management function is carried out by the Risk Management division. The Head of Risk Management reports directly to the CFO. Reporting lines have been set up between the Head of Risk Management function and ERGO Group CRO.

By the end of 2025 the Risk Management Function was performed by:

- The Head of Risk Management division in the Baltic States;
- Deputy Head of Risk Management in the Baltic States, who is also the Risk Manager in Lithuania;
- Risk Manager in Estonia;
- Risk Manager in Latvia;
- Information Security Officer in Baltic States;
- Business Continuity Lead in Baltic States;
- 2 Information Security specialists.

During the 2025 Head of Risk Management division in the Baltic States changed.

The Risk Management function is the main operating unit responsible for implementing the risk management system in ERGO. Its main purpose is to assist the Management Board to effectively implement a risk management system and integrate it into business operations. Members of the risk management function are not engaged in regular business operations to ensure their operational independence. The risk management function has full and unlimited access to information throughout the company.

Main functions and objectives:

- Coordination tasks: The risk management function coordinates the Risk Management activities at all levels and in all business areas. In this role, it is responsible for the development of strategies, methods, processes and procedures for the identification, assessment, monitoring and management of risks, and ensures correct implementation of Risk Management guidelines.
- Risk control tasks: The risk management function is responsible for mapping the overall risk situation of the company. Its tasks also include adequate consideration of reciprocal interactions between individual risk categories, the preparation of an aggregated risk profile as well as, in particular, the identification of risks threatening the continued existence of the company/Group.
- Early warning tasks: The responsibility of the risk management function also includes implementation of a system that ensures the early recognition of risks and preparation of proposals for suitable countermeasures.
- Advisory tasks: The risk management function advises the Board of Management on Risk Management matters and supports strategic decisions in an advisory capacity.
- Monitoring tasks: The risk management function monitors the effectiveness of the Risk Management System, identifies possible weaknesses, reports to the Management on these and develops suggestions for improvement.

The risk management function also ensures comprehensive reporting to the Management; in addition to illustrating the current risk situation, this also includes Own Risk and Solvency Assessment (hereinafter ORSA) results and an assessment of the quality of the Risk Management System.

The risk management duties and responsibilities in ERGO are divided among Risk Management, Information Security Officer and Actuarial functions.

In addition to the actuarial activities, Actuarial function is responsible for the risk management system with focus on the projection of the future financial position, development of methods and processes in line with group standards for risk evaluation and monitoring (especially related to quantitative risk evaluation), identifying, assessing and managing risks related to technical provisions, identifying and assessing risks related to underwriting and reinsurance and the assessment of the solvency position.

Information Security Officer is responsible for development, implementation and maintenance of the Information security risk management framework, that includes complete and consistent identification of the need for information protection according to clearly defined categories in the ERGO, identification of existing (or possible) information security and IT security related threats, evaluation on the fulfilment of information security requirements, collection, monitoring and assessment of information security and IT security risks on the Company level and providing recommendations regarding its mitigation and/or elimination.

Risk management is embedded in relevant steering and business processes. This is ensured by clearly defining processes, roles and responsibilities. It can be stated, that risk management is involved whenever decisions are taken that may lead to a significant change in the risk profile. When decisions are required that lie outside the predefined level of authority of the risk taker, involvement of and vote from risk management is mandatory.

The examples of the processes, where risk management function is involved, are:

- New products incl. adjustments (insurance products, investments) and new business segments
- Third Party Risk Management incl. Outsourcing
- Investment Management;
- Underwriting/Reinsurance;
- Strategic Planning Process.

B.3.8 Own risk and solvency assessment

The Own Risk and Solvency Assessment (ORSA) is an integral part of our risk management system. The performance of the ORSA is embedded in the relevant processes, e. g. risk management, planning process, capital management. The results and conclusions of the ORSA – documented annually in the ORSA Report – are an important management tool and have to be taken into account in the strategic decisions on an ongoing basis.

The Board of Management has the ultimate responsibility for ORSA. It plays an active role in the set-up of ORSA and has to challenge the ORSA outcome. The objectives of the ORSA and the corresponding roles, responsibilities and processes are described in the ERGO ORSA Policy which has been approved by the ERGO Board.

The development of the risk strategy is closely aligned with the annual business planning cycle and the corresponding ORSA considerations. The ORSA aims to promote a better understanding of the specific risk profile of the company and to enhance the decision making on board level by using the ORSA results e. g. within the business planning process. The ORSA process also allows disclosure of sufficient and clear information to relevant stakeholders.

The regular ORSA activities associated with the business planning process are conducted annually or more often if necessary (after significant changes in the risk profile). The timeline for annual ORSA is defined in line with the Company's annual planning process. More frequent monitoring is in place for the most relevant risk criteria via quarterly risk reporting as well as ad hoc reporting.

As part of the ORSA, the connection between the risk profile, the risk tolerances and the own solvency needs are outlined. Own solvency needs is determined based on the following processes:

- Definition and annual review of the "Financial Strength" criteria in Risk Strategy;
- The assessment of the quantity and quality of Own Funds;
- Assessment of actual capital adequacy over the business planning horizon;
- Demonstration of main assumptions underlying the projections;
- Performance of stress test and scenario analysis;
- Assessment of the model appropriateness;
- Assessment of the risks not covered in the model.

Within ORSA probable and potential capital needs to manage the capitalisation of the company are identified. The risk management function makes proposals to determine if additional measures are necessary together with a statement if additional risk capital is required for the coverage of non-modelled risks. More specifically, the outcome of the ORSA shall feed into the development of a capital management plan over the time horizon of the business plan. The risk management function should propose actions based on the information gathered during the performance of the ORSA if necessary.

B.4 Internal control system

Our operational risk control system (ORCS), as key element of internal control system, as well as non-financial risk management, is a system for managing operational risks integrated across all risk dimensions and areas of the company. The ORCS meets the requirements of corporate governance as well as the legal and regulatory requirements. It creates transparency and oversight regarding those risks, which might have a significant negative impact on the organization's operational environment, reputation and/or financial situation.

ERGO's ORCS functions as an integrated component of our group-wide risk management and hence constitutes a key element of ERGO's corporate governance. The ORCS identifies, analyses and evaluates material operational risks and their corresponding (key) controls across all key risk dimensions (financial reporting, compliance and operations) to achieve a harmonized, holistic approach to controls without overlaps or gaps.

The ORCS is based on the concept of the three lines of defence represented by three roles: risk-takers (the ones who take the risks and manages them), risk controllers (the ones who ensures that risks are effectively managed) and independent assurance (the ones who are independent of risk takers and controllers, and assess the adequacy and effectiveness of the control environment). The overall responsibility for material risks, its key-controls, and setting the overall risk tolerance, lies with the Management Board (Risk owner).

Organizational responsibility of ORCS framework lies under Risk Management. The departments are responsible for the risks and controls within their area. The clear allocation of roles in the ORCS with defined responsibilities for processes, risks, controls and steering measures increases transparency and ensures effectiveness and efficiency in the control processes.

By making our risk situation transparent in this way, we can focus on and react rapidly to possible weaknesses or changes in internal and external requirements. This means that we are able to identify risks at an early stage, address control shortcomings immediately and take effective remedial action.

Internal Audit assesses regularly the effectiveness of the ORCS in the key processes and applications.

B.5 Compliance function

The Compliance Function includes advising the administrative, management or supervisory body on compliance with the laws, regulations and administrative provisions adopted pursuant to Solvency II directive and others. It also includes the assessment of the possible impact of any changes in the legal environment on the operations of the undertaking concerned and the identification and assessment of compliance risk.

The Compliance function is part of internal control system as it implements the 2nd level of control within the Company. The activity of the Compliance function is regulated by EU and local legal acts, ERGO Group Compliance Policy and the Compliance Policy of ERGO Insurance SE and ERGO Life Insurance SE, which is reviewed and updated at least annually. Fit and proper requirements to persons who perform the Compliance Function are applied as required.

By the end of 2025 the Compliance Function was performed by:

- Head of Legal and Compliance in the Baltic States, who is also the Chief Compliance Officer;
- Head of Compliance department in the Baltic States, who is also the Compliance Specialist in Lithuania;
- Compliance Specialist in Latvia;
- Compliance Specialist in Estonia.

The activity of the Compliance Function is based on the annual compliance plan, approved by the Management Board. The annual compliance plan specifies various activities related to elements of the Compliance Management System, i. e. compliance culture, norms and advisory, risk assessment, monitoring, communication and training, investigation, reporting.

The Compliance Function has these basic responsibilities:

- Compliance risk control: identification and assessment of compliance risks, recommendations for the mitigation and elimination of compliance risks, participation in design of compliance risk control measures.
- Early warning: monitoring of significant changes in the legal environment and provision or relevant information to respective recipients; recommendations regarding compliance risks and escalation.
- Consulting and reporting: consultation on compliance with applicable legal requirements and possible impact of legal changes, compliance trainings, escalation of relevant compliance issues, participation in relations with other subjects.
- Monitoring: monitoring of adherence to legal requirements on a regular basis and creation of necessary controls.

B.6 Internal audit function

The Internal Audit of ERGO supports the Supervisory Board and the Management Board in carrying out its monitoring tasks. In particular, it is responsible for examining the system of internal governance. These include the management system, internal control system (ICS) and three key functions compliance, risk management and actuarial.

The Internal Audit is an independent function. However, it operates within the framework of the standards applicable throughout the Munich Re Group. It is legally assigned to ERGO. The Head of Internal Audit is directly subordinated administratively to the Chief Executive Officer (CEO) of ERGO and functionally – to the Supervisory Board. It also has a so-called “dotted reporting line” to the Head of ERGO Group Audit.

The audit mandate of Internal Audit covers all units of ERGO, its branches and subsidiaries. By the end of 2025 the Internal Audit Function was performed by:

- Head of Internal Audit Division in Baltics;
- 2 Internal Auditors in Lithuania;
- Senior Internal Auditor in Latvia;
- Senior Internal Auditor in Estonia.

The core tasks of Internal Audit include:

Audit Performance: Internal Audit audits the Governance System, consequently the entire business organization, and in particular the Internal Control System in terms of appropriateness and effectiveness. The auditing work of Internal Audit must be carried out objectively, impartially and independently at all times. The audit area of Internal Audit covers all activities and processes of the Governance System and explicitly includes the other Governance Functions. The audit assignment includes the following areas in particular:

- Effectiveness and efficiency of processes and controls,
- Adherence to external and internal standards, guidelines, rules of procedure and regulations,
- Reliability, completeness, consistency and appropriate timing of the external and internal reporting system,
- Reliability of the IT systems,
- Nature and manner of performance of tasks by the employees.

Reporting tasks: A written report is prepared after each audit. At least once per year, Internal Audit will prepare a report addressing Internal Audit’s mandate, principles and other aspects in line with the requirements of international Internal Audit Standards as well as main audit findings for the past financial year. Within the follow-up process, Internal Audit is also responsible for monitoring the rectification of deficiencies.

Consulting tasks: Internal Audit can provide consulting work, for example within projects or project-accompanying audits, and advise other units concerning the implementation or alteration of controls and monitoring processes. The prerequisite is that this does not lead to conflicts of interest and the independence of Internal Audit is ensured.

B.6.1 Independence and Objectivity

The managers and employees of Internal Audit are aware and adhere to the national and international standards for the professional conduct of Internal Audit.

This also applies to the principles and rules for safeguarding the independence and objectivity of Internal Audit. Numerous measures (adequate positioning in the organizational structure, consistent segregation of duties, and

comprehensive quality assurance during the audit) ensure that the independence and objectivity of Internal Audit is adequately ensured.

The Head of Internal Audit is directly subordinated administratively to the CEO and functionally – to the Supervisory Board. She has direct and unrestricted access to the Management Board and the Supervisory Board of ERGO and all branches and subsidiaries. As a service provider for the company she is independent from all other functions of the company.

In order to ensure independence, the employees of Internal Audit do not assume any non audit-related tasks. Employees who are employed in other departments of the company may not be entrusted with Internal Audit tasks. This does not exclude the possibility for other employees to work for Internal Audit temporarily on the basis of their special knowledge or personnel development measures.

When assigning the auditors, attention is paid to the fact that there are no conflicts of interest and that the auditors can perform their duties impartially. In particular, it is ensured that an auditor does not audit any activities for which he himself was responsible in the course of the previous twelve months.

Internal Audit is not subject to any instructions during the audit planning, performance of audits, evaluation of audit results and the reporting of the audit results. The right of the Supervisory Board and the Management Board to order additional audits does not impair the independence of Internal Audit.

According to the statement of the Head of Internal Audit, the function has sufficient resources and conducts the audits on its own responsibility, independent and impartially (objectively). The Head of Internal Audit contributes to the independence and objectivity of Internal Audit by her behaviour.

During 2025, there were no changes in Internal Audit function.

During the reported period the independence and objectivity of the Internal Audit was not impaired at any time.

B.7 Actuarial function

Within the scope of the tasks as per Solvency II, the Actuarial Function performs monitoring tasks in the actuarial field as the 2nd line of defence. Focal points are the coordination of the calculation of technical provisions, monitoring tasks are related to the underwriting policy as well as the use of reinsurance. The Actuarial Function also supports the Risk Management Function.

By the end of 2025 the Actuarial Function was performed by:

- Head of Actuarial Department, who is also the Appointed Actuary.
- Validating Actuary for the Baltics.
- 2 Actuaries for the Baltics.
- 2 Junior Actuaries for the Baltics.

ERGO actuaries have a detailed understanding of economic, financial, demographic and insurance risks in the Baltic States and expertise in developing and using statistical and financial models to facilitate financial decisions, pricing, establishing the amount of liabilities, and setting capital requirements for uncertain future events within ERGO. Actuarial skills are used in establishing premiums, policy and claim liabilities as well as appropriate capital levels.

The role of the Actuarial Function in ERGO is to measure, manage, and mitigate risks by using statistical models and analysis to enhance the understanding of risks assumed. Actuaries also provide advice on the adequacy of risk assessment, reinsurance arrangements, investment policies, capital levels and stress testing of the future financial condition of these companies.

The Actuarial Function performs its tasks independently from the business functions and from risk taking activities of the Management Board and has no responsibility for the company's profits and financial results. The Head of Actuarial Department carries out the Actuarial Function in ERGO and reports to the Management Board member CFO.

In performing the tasks of the actuarial function regarding the Art. 48 Directive, the function is divided between these units:

- In coordinating the technical provisions regarding the legal entity reporting and Munich Re group model Actuarial department performs the tasks according to article 48, in particular parts a)–f) and according to the corresponding article 262 (level II statements), in particular 1)–5);
- Regarding underwriting policy and reinsurance arrangements Actuarial department performs the tasks according to article 48, in particular parts g)–h) and according to the corresponding article 262 (level II statements), in particular 6)–7).

B.8 Outsourcing

Some of company's functions are outsourced. Despite outsourcing, the Company still bears responsibility for ensuring that the purchased service meets the criteria set for insurance companies. Third Party Risk Management (TPRM) Policy and guidelines regulate the outsourcing of any critical or important operational functions or activities.

An outsourcing arises when a service provider is directly selected by ERGO to carry out certain activities and processes in connection with the performance of insurance, financial or other services that are:

- Otherwise provided by the insurance company itself (insurance-specific), and
- Important for the company.

An activity is insurance-specific only when there is a relation between the outsourced activities and the original insurance business. A transferred task is considered important for the company when it is long-term (usually more than one year) or occurs with a certain frequency (not one-off business or business with occasional external character) and is also of significance for the company (thus not ancillary, preparatory or subordinate activities). This applies also in case of partial transfer of the task.

The important outsourcing (outsourcing of important function or insurance activity) arises when an insurance company would otherwise not be able to provide its services to its policyholders (indispensability) and in the case of a malperformance or an unsuitable service provider the abstract risk would arise that the quality of the business organization would be significantly impaired or the operational risk unreasonably increased.

The following critical or important operational functions or activities are outsourced in ERGO:

- Sales function is partially outsourced.
- Policy administration is partially outsourced, specifically call centres and printout and sending of dunning letters.
- Medical advisor in claims handling is partial outsourced.
- Investments and/or asset management is outsourced.
- Rendering of data storage services is partially outsourced. Specifically, services related to archiving.
- Regular maintenance and support for the relevant IT systems is partially outsourced.
- Archiving is partially outsourced.
- ERGO has not outsourced any key functions. All of the service providers of above mentioned outsourced or partially outsourced functions are located on the territory of the European Union. There was no new outsourcing agreements executed during the reporting period in addition to existing outsourcing partners reported earlier.

B.9 Assessment of adequacy for the system of governance

The Company continuously aims to improve its compliance and governance systems by ensuring that they are regularly reviewed and evaluated.

The organizational structure of ERGO is considered appropriate to the complexity and size of the operations as well as to the business strategy. The Organizational Structure Management Policy sets the consistent and transparent principles of organizational structure management, to support management and employees in the development and implementation of effective organizational structure management practices.

The system of governance of ERGO includes an adequate transparent organizational structure with a clear allocation of functions and responsibilities:

- the business organization and all disciplinary and functional reporting lines are documented;
- responsibilities are appropriately segregated in order to ensure the effective operating of the system of governance.

Governance model is described in “Guidelines on Review of System of Governance” and set by the Management Board decision on management view of the governance model. The review of the System of Governance conducted every second year or on an ad hoc basis in case of identification of governance risks or significant changes in business or its structure is foreseen.

The purpose of this review is to evaluate the adequacy and effectiveness of the System of Governance and to address the Management Board to take appropriate measures in case any deficiencies were identified.

A concept of independent governance functions (“1st, 2nd and 3rd lines of defence”) has been implemented within ERGO, ensuring that there is no undue influence, control or constraint exercised on the risk control functions with respect to the performance of their duties by other operational functions. Independent governance functions and business functions which build up risk positions are clearly segregated at all levels, including the Management Board.

An effective system for ensuring the transmission of information is in place. Clear disciplinary and functional reporting lines ensure prompt transfer of information to all persons who need it.

Requirements for the creation and communication of policies, guidelines and work instructions are laid out in a Guideline (“Guideline for creation and administration of internal norms”), ensuring that all persons are aware of all information necessary for the proper discharge of their responsibilities.

ERGO has established their key functions in an adequate way: the key functions risk management, compliance, internal audit and actuarial function are established in separate organizational units. The Head of each unit has been appointed as key function holder. The organizational set up of the key functions provides independence in performing their control function.

B.10 Any other information

There is no any other information.

C. Risk Profile

The risk profile describes the risks ERGO is exposed to. The Management Board considers the risk profile when deciding on steering measures. The overall risk profile is integral part of the annual ORSA report and includes a qualitative and quantitative assessment for modelled and non-modelled risks. When determining the risk profile, ERGO looks at the risks arising from the business portfolio across all risk categories.

The Risk Management Function is responsible for ensuring that adequate processes surrounding the overall risk profile have been established. The risk profile also provides important input for the determination of the risk appetite in the annual risk strategy as well as for internal risk reporting and ORSA. Significant changes to the company risk profile are reported promptly by the Risk Management Function to the management board.

Description of how assets have been invested in accordance with the „prudent person principle“

Company runs liability-based investment approach i. e. first step in investment process is to establish different characteristics of liabilities (e. g. maturity structure, currency structure etc.). After that, risk neutral portfolio of assets can be established. Risk neutral portfolio is hypothetical asset portfolio which replicates liability structure. In case, Company has sufficient solvency capital available it can deviate from risk neutral asset portfolio. Otherwise, Company will build up asset portfolio which corresponds to liability structure as much as practically possible.

Composition of asset portfolio will take into account appropriate diversification between asset classes and issuers. Proper quality and security of the asset portfolio is ensured by monitoring average rating of fixed income portfolio (as this forms biggest part of the asset portfolio). Company ensures also adequate liquidity of the portfolio – sufficient amount of funds must be available even in most severe circumstances.

Use of special purpose entities

The Company does not use any purpose companies within the meaning of Directive 2009/138 / EC of the European Parliament and of the Council.

C.1 Underwriting risk

C.1.1 Risk exposure

Under the light of current market situation and Company’s portfolio movements, key risk drivers remain unchanged since last year:

- Risk free rate fluctuations. In the light of underwriting risk, risk free rate fluctuations have a significant impact on all life underwriting risks. However, only decrease of risk-free rate results to increase of risk capital. If further increase of risk-free rate is observed, decreases in all life underwriting risks will be present.
- Mortality assumptions for pension annuities in annuity payment phase. The risk arising from using incorrect longevity assumptions when pricing annuities. The risk is related mainly to annuity pricing. The result is inadequate premiums, resulting in loss. In case of future experience mortality adjustments, increase in life longevity risk would be present as well.
- Mortality risk. The risk arising using incorrect mortality assumptions when pricing life policies. The risk is related mainly to life insurance pricing. The result is inadequate premiums, resulting in loss. Any subsequent modelling assumption adjustments would result in life / health SLT mortality risk increase. The risk is currently considered small.
- Morbidity / disability risk. The risk arising using incorrect on morbidity / disability assumptions when pricing life policies with riders. The risk is related mainly to life policies with riders. The result is inadequate premiums, resulting in loss. Any subsequent modelling assumption adjustments would result in life / health SLT morbidity / disability risk increase change.
- Expense risk. Insufficient premium amount to cover the expenses. Increase in actual expenses in comparison to planned expenses. The risk results in lower than planned technical result. Expense risk is monitored regularly: revision and adjustment of business processes to increase efficiency and optimize expenses. Any subsequent modelling assumption adjustments would result in life / health SLT expense risk increase change.

- Health NSLT premiums and costs. The risk that actual expense level is higher than estimated. The calculated premiums do not cover the expenses and claims, resulting in possible negative technical result and loss of customers and market share. Due to soft market the premium level on the market is low, therefore it is difficult to renew existing contracts and attract new customers. Significant part of costs is fixed, therefore loss of customers affects the cost level directly. Changes in Lithuanian legislation (10% Defence tax) for health insurance policies might also shrink the portfolio and Health NSLT risk due to lower new business volumes.
- Health NSLT attritional losses. The risk of a higher number of attritional losses and more severe claims than expected. Due to soft market the risk that the price level does not cover the actual number of losses. The risk can also appear due to low quality risk selection and inadequate risk assessment. The result is unexpected loss and negative technical result also affecting the solvency. Additionally, the risk affects the costs (due to more resources in claims handling).
- Health NSLT renewal risk. Health NSLT is a product with the duration of one year at most. Therefore, future business volumes depend significantly on contract renewals. In case of decrease in renewals, health NSLT business volumes would decrease on one hand. On the other, it would lead to straightforward decrease in health NSLT reserve and premium risk as well.
- Health NSLT morbidity. Increase in medical costs that cannot be absorbed through premium adjustments. Increase in claims expenditure due to exceptional, one-off events (e. g. pandemics). This results in the risk of pricing health policies incorrectly due to incorrect assumptions on morbidity / disability or inappropriate underwriting decisions. The result is inadequate premiums, resulting in loss.

C.1.2 Measures for risk assessment

The following criteria are assumed:

- Reserve risk. Changes in future policyholders' behaviour and management actions might lead to necessity to re-evaluate best estimate parameters used for reserving purposes. Latter might cause fluctuations in technical provisions. Therefore, parameter validation is performed on annual basis and if inappropriateness is found, corresponding parameter update procedure is initiated.
- Loss and expense developments: Life Insurance. Claim and administrative cost ratios are examined on quarterly basis for term life product and riders. If significant deviations from expected claim probabilities were determined, premium rate adjustment for future new business would be initiated.
- Loss and expense developments: Health Insurance. Claim and administrative costs are examined on quarterly basis as well as for life insurance. However, due to shorter policy duration (health product has a duration of one year the most) premium rate adjustment in case of insufficiency is more effective than for life products. Also, risk of overestimation of premium rates must be avoided due to possible decrease in renewals.
- Lapse risk. The risk is relevant for life insurance. The analysis is performed on annual basis in order to capture significant actual lapse deviations from best estimate rates. Risk of overestimating lapses for products with guaranteed outgoes is of major importance.
- Product development and tariff changes. Due to significant changes in interest rate environment in the market in past year, guaranteed investment return revision is required as well as monitoring of products' with guaranteed investment return share in new business to assure fair value for money to the clients.
- Reinsurance structure. The reinsurance structure is continuously revised and (if needed) updated.

C.1.3 Material risk concentrations

The Company's liability portfolio is considered to be well diversified. When calculating 2025 ORSA scenarios most material risk concentrations were evaluated. The most concentrated portfolios are fully reinsured and the concentration risk for the remaining ones is considered non-material for Solvency situation.

C.1.4 Risk reduction techniques

In the year 2025 the following risk mitigating techniques were present:

- Reinsurance. Reinsurance program for larger insurance sums as well as catastrophic events is present. The purpose of ERGO Reinsurance program is to mitigate result's volatility due to the large claims. The reinsurance treaties are long term obligatory or/and facultative treaties. These reinsurance contracts are proportional agreements. For catastrophic events reinsurance treaties are renewable annually. The reinsurance program is reviewed at least once per calendar year and, if necessary, supplemented and updated.
- Profit sharing revision. Due to low investment returns in the market in past years, significant fluctuations in recent months and uncertainty about future development, profit sharing is evaluated cautiously in order not to promise too high rates which might not be acceptable for the company or would be assumed too low from policyholders' perspective.
- New business value follow-up. New business value is evaluated on annual basis and if the value falls outside acceptable ranges, new business premium rates are adjusted or new product creation procedure is initiated.

C.1.5 Description of Stress tests and scenario analyses

Primary objectives of stress tests and scenario analyses are to enhance the transparency of the risk profile particularly by evaluating the sensitivity of the solvency ratio and the Company's viability. The focus of the stress tests and scenario analyses is set on assessing the Solvency Capital Requirement (SCR) according to the Standard Formula and Own Funds (OF) impact of scenarios or stresses.

Materiality concept was considered when choosing the stresses and scenarios for testing. According to quantitative criteria, the risk modules that significantly contribute to the SCR are: Market risk concentrations, Spread risk, Equity risk, Health NSLT underwriting premium and reserve risk. Level of life underwriting expense and lapse risks is very close to the level of significantly contributing risks, therefore, stress scenarios cover potential changes in lapse rates as well. In addition qualitative criteria were considered: the analysis also includes risk factors, which might evolve into material risk in the future (e. g. longevity risk) and risks driven by an actual stressed environment (e. g. low interest rates, downgrading of bond ratings, decrease of interest rates).

All the stress situations were modelled using portfolio data as at 30.06.2025. The summary of the conducted stress tests is presented in the table below.

	Test	Change in OF	Change in SCR	Change in Solvency ratio
Solo stress tests	**1. Interest rate** parallel shift by a) -50 bps b) -100 bps c) -200 bps d) +100 bps e) +200 bps	 a) -5 m€ b) -11 m€ c) -24 m€ d) +9 m€ e) +15 m€	 a) -0,4 m€ b) -0,8 m€ c) -1,1 m€ d) +0,9 m€ e) +2,8 m€	 a) -11 pp b) -23 pp c) -57 pp d) +17 pp e) +23 pp
	2. Equity shock: equity value decrease by 40%	-8 m€	-2,8 m€	-7 pp
	3. Inflation shock: inflation increase to 5%	-21 m€	–0,1 m€	-51 pp
	4. Lapse risk: a) 1 year 15% absolute b) Persistent +50% from respective lapse rates	 a) -2,5 m€ b) -11 m€	 a) -1,2 m€ b) -1,7 m€	 a) -1 pp b) -21 pp
	5. Premium risk for Health: a) health new business decrease by 5% b) health new business increase by 20% c) health new business decrease by 20%	 a) +0,3 m€ b) -1,5 m€ c) +1,5 m€	 a) -0,3 m€ b) +1,3 m€ c) -1,3 m€	 a) +2 pp b) -10 pp c) +10pp
	6. Spread risk scenario: Rating class is downgraded by one level	-4,8 m€	+6 m€	-35 pp
	7. Change of combined ratio in Health business: increase of a) 5 ppts b) 10 ppts	 a) -1,3 m€ b) -2,4 m€	 a) <0,01 m€ b) <0,01 m€	 a) -3 pp b) -6 pp
	8. Annuity longevity assumption change: 10 pps increase from current best estimate longevity rates	-0,8 m€	0,01m€	-2 pp
	9. Natural catastrophe event: a) Flood b) Storm c) Accident	 a) <0,01 m€ b) <0,01 m€ c) <0,01 m€	 a) <0,01 m€ b) <0,01 m€ c) <0,01 m€	 a) None b) None c) None
	10. Equity + lapse risk: a) 1 year 15% absolute lapse increase and equity value decrease by 40% b) Persistent +50% from respective lapse rates increase and equity value decrease by 40%	 a) -11 m€ b) -19 m€	 a) -4,1 m€ b) -4,5 m€	 a) -8 pp b) -30 pp
	11. Low interest rates and decrease of longevity: Interest rate parallel shift down by 100 bps Longevity (or death probability) decreased by 10%	-12 m€	0,7 m€	-26 pp
	12. Life mortality assumption change: 50% decrease from current best estimate mortality rates	+11 m€	+1,2 m€	+22 pp
	13. Change of Combined ratio and new business volume for Health: Health new business: Increase by 20% Combined ratio: Increase by 10 pp	-4,3 m€	+1,3 m€	-17 pp
	14. Recession – increase in lapses and decrease in health premiums: Health premiums: decrease by 20% Lapse rates: first year lapse increase to 15%	-0,9 m€	-1,2 m€	+3 pp
	15. Reverse stress test Solvency ratio falls under 100%, i.e. Own Funds < SCR Interest rate decreases by 200bps and inflation increases to 5%	-45 m€	-1,2 m€	-109 pp
	16. Solvency ratio falls under 140% – interest rate decrease by 100bps and rating class is downgraded by one level	-15,8 m€	+5,2 m€	-56 pp
	17. Default of government bonds	At least 5 country defaults are needed to bring OF/SCR to 100% and at least 12 for OF/MCR		

	Test	Change in OF	Change in SCR	Change in Solvency ratio
Risks in the business plan	**18. Operational risk scenario:** Violation of GDPR requirements – penalty 2% of total GWP	-1,8 m€	None	-5 pp
	19. Operational cyber risk scenario: IT system interruption (incl. cyber-attack) resulting in no new business for one month, lapse increase to 15% for one year and additional costs of 600 000 EUR.	-2,5 m€	-1 m€	-1 pp
	20. Climate change: life insurance mortality and morbidity 20% increase in mortality and morbidity rates	-8 m€	-0,4 m€	-18 pp
	21. Climate change: equity risk and credit spread widening Equity value -40%, credit spreads +20 bps	-6,2 m€	-1,7 m€	-7 pp
	22. LT Health insurance new business will decrease by 30% (tax issue)	-0,1 m€	-0,4 m€	+2 pp
	23. Health insurance in LV new business increase 2 times, LT health business will increase 2,3 times (tax+GJ merging), admin expenses will increase for whole portfolio by 10%	+1,4 m€	+5,2 m€	-19 pp
	24. Assets shock: Assets issued by Baltic countries value decrease by 30% (Geo)	-15 m€	-3 m€	-23 pp

Table 5. Summary of stress tests.

The performed stress tests to evaluate the sensitivity of solvency ratio did not reveal any significant impact on Solvency situation. None of the stress tests defined above led to insolvency.

C.2 Market risk

C.2.1 Risk exposure

Major part of asset portfolio carries interest rate and credit risk.

Another important risk carrier in asset portfolio is property. Company owns units of real estate funds (Eften II, Eften Residential and Baltic Horizon) as well as direct participation in Real Estate Company ERGO Invest SIA. Consequently, equity exposure, according to Standard Formula, is significant.

C.2.2 Measures for risk assessment

The significant market risks are evaluated within the Standard Formula. Additionally, exposure to fluctuations in market value is assessed on an ongoing basis using one internal model. Net Loss Limit (NLL) monitors the probability of achieving a result that surpasses the minimum investment result fixed by the actuaries. Clearly defined processes ensure that the company can respond timely to any significant capital market developments.

The company manages its asset risk by preparing a new investment policy on an annual basis. Implementation of the strategy and adherence to restrictions is monitored by a multi-level structure.

In 2025, tactical decisions were made and implemented by GIM – Group Investment Management department of Munich RE. The compliance of investments with the adopted strategy is monitored by the asset and liability management team (AL Team) which, in addition to GIM representative, consists of company's actuaries, investment officers, risk manager, head of planning and controlling department and Management Board member. If problems arise, AL Team is in position to develop appropriate risk measure which will be then implemented by asset manager. Many ERGO group units are also involved in planning, monitoring, and managing investment risks.

C.2.3 Material risk concentrations

Below is list of 10 counterparties with highest market exposure.

Counterparty	Total exposure	Rating class
ERGO Invest SIA	11 824 935	N/A
Republic of France	9 387 893	A+
Federal Republic of German	8 168 520	AAA
EfTEN Capital AS	5 665 367	N/A
Republic of Ireland	5 518 034	AA
Republic of Italy	5 447 761	BBB
Kingdom of Spain	5 046 899	A-
Republic of Austria	5 034 256	AA+
Kingdon of Belgium	4 780 743	AA-
Republic of Lithuania	4 336 380	A

Table 6: List of counterparties

C.2.4 Risk reduction techniques

Company does not have any risk mitigation techniques currently in place.

C.2.5 Description of Stress tests and scenario analyses

Exposure to fluctuations in market value is assessed on an ongoing basis using dedicated internal model. Net Loss Limit (NLL) monitors the probability of achieving a result that surpasses the minimum investment result fixed by the actuaries.

C.3 Credit risk

C.3.1 Risk exposure

Credit risk is defined as the economic loss that can arise if the financial situation of a counterparty changes. When identifying credit risks we look at the risks which are inherent to assets and liabilities. We analyse what impact this risk could have on our financial situation, particularly resulting from a counterparty risk of migration (deterioration of the "credit rating" of the counterparty) and the credit spread risk (price changes within a fixed rating class), be it asset or liability side. The credit risk on the asset side is based on three main components:

- Change of credit quality of a counterparty over the horizon of the analysis.
- Dependency of changes in the credit quality of several issuers.
- Change of market value of an instrument taking into account possible changes in the credit quality of the issuer.

In order to monitor and control our group wide credit risks, the Group has implemented a cross-balance-sheet counterparty limit system valid throughout the group. The liability-driven Investment Process is designed to manage and to limit this risk to an acceptable level.

C.3.2 Measures for risk assessment

Credit risk is not evaluated explicitly in Standard Formula approach. It is only captured implicitly under a combination of market and counterparty default modules. From the perspective of ERGO Group the latter is proved to be reasonable since there are no material differences between corresponding shocks applied in Internal Model and Standard Formula. The proof can be found in "Specification of the adequacy of the standard formula for the risk profile of the ERGO undertakings". Credit risk reasonableness in proved in "Manual of Methods of Credit Risk".

In our fixed-income investments, we control the associated credit risk by selecting issuers with appropriate quality and observing counterparty limits. The rating of external rating agencies is just one of the several criteria that we take into account. In addition, we carry out our own analyses. Our very high demands on issuers are also reflected in Group-wide investment principles. The majority of our investments consist of securities issued by issuers with very good credit ratings.

The counterparty credit risk we face is closely monitored and actively managed. In an annual process we analyse our Company's exposure to reinsurance counterparties, especially for ceded business outside of the Munich Re group. Here, we also benefit from the central credit risk assessment processes of MR Group.

The weighted average rating of fixed-income securities was A at the end of the year (2024: A).

C.3.3 Material risk concentrations

Please see chapter C.2 Market risk.

C.3.4 Risk reduction techniques

We control and monitor our counterparty default risks through a Group-wide counterparty limit system. The limits are based on the financial position of the counterparty and on the risk tolerance defined by the Management Board.

Counterparty limits are constantly monitored and adjusted if necessary.

C.3.5 Description of Stress tests and scenario analyses

Please see chapter C.2 Market risk.

C.4 Liquidity risk

C.4.1 Risk exposure

Considering the size and liquidity characteristics of fixed income portfolio it is reasonable to expect availability of liquid funds even under most severe insurance and market events.

Liquidity needs might be significantly increased because of run-on-the-bank scenario (sudden increase of lapse ratio). Additionally, there is possibility of liquidity squeeze in the financial markets but considering maturing bonds and high share of liquid government bonds, Company should be in position to meet liquidity demands even under most severe circumstances.

C.4.2 Total amount of the expected profit included in future premiums

In accordance to Article 260 expected profit included in future premiums (hereinafter EPIFP) is recognized for health SLT and other life insurance lines of business for the life company. The split is provided in the table below.

	EPIFP at 31.12.2024	EPIFP at 31.12.2025
Health SLT	9 956 955	12 123 825
Other life insurance	9 131 177	13 767 079
Unit-linked	31 543 119	30 931 080
Total	50 631 250	56 821 984

Table 7: The split in EPIFP

C.4.3 Measures for risk assessment

Finance and Investment department prepares cash flow report on quarterly basis where both liability and asset side cash flows are forecasted for next 12 months. In case significant shortage or excess is foreseen then appropriate steps on asset side is taken in order to meet upcoming demand or surplus.

C.4.4 Material risk concentrations

There are no material risk concentrations regarding liquidity risks.

C.4.5 Risk reduction techniques

Liability based investment approach, where liabilities are matched with assets with similar maturity structure, forms also good foundation for reducing liquidity risks. Additionally, fixed income portfolio consists significant part of government and covered bonds with excellent liquidity characteristics.

C.4.6 Description of Stress tests and scenario analyses

No scenarios were explicitly calculated for the liquidity risk this year, as the company's good liquidity position is unlikely to lead to any developments that jeopardize the capitalization of the company.

C.5 Operational risk

C.5.1 Risk exposure

Operational risks are inevitably connected to the Company's business activities. They should be mitigated or if possible avoided as long as this is economically feasible. The causes of operational risks are human errors, erroneous processes, inadequate information and telecommunications technology, external influences, such as natural disasters, and legal risks.

Due to turbulent time the Company anticipated the increase in number of operational incidents, e. g. IT incidents, data and security protection incidents and possible external frauds. This is systematically monitored through KRI and regularly reported to the Management Board and Executives in quarterly risk reports. As of the end of 2025 it could be summarized that none of the above-mentioned risks significantly increased. Indeed, security of ERGO systems was assaulted by grown number of phishing attacks. Additional preventive and directive controls were applied as the respond to the increased threat possibility.

C.5.2 Measures for risk assessment

The Company manages the risks which are connected to the business processes with adequate controls in the respective processes and used IT applications. Also, the controls and measures on legal entity level guarantees compliance with the regulatory requirements. The functionality of the single controls is guaranteed via the cooperation of the different functions of the 1st to 3rd line of defence and as well via the interlocking of controls on the different levels within the Operational Risk and Control System.

The operational risks are assessed both qualitatively and quantitatively. The qualitative assessment is performed during the annual risk and control assessment, where net risks (net after control/mitigation) are compared with a predefined limit system (heat maps) and significant risks are managed as necessary through (further) reduction, transfer and/or intensive monitoring.

C.5.3 Material risk concentrations

Weaknesses in the control environment, as well as in the central IT systems, can have an impact on the insurance-related operating process and thus have a cumulative impact.

C.5.4 Risk reduction techniques

The Operational Risk management focuses on the following operative elements:

- Resources, especially information and infrastructure (IT and buildings).
- Human Resources and processes.
- Projects.

We mitigate risks coming from our business processes with controls on process, IT and entity level. Controls on process level can be authorization systems, 4-eyes principle, segregation of duties, guidelines, etc. Examples of IT controls are backup solutions, access controls and corresponding emergency planning. Entity level controls aim to assess whether the regulatory requirements pertaining to an adequate control environment are fulfilled. All employees are regularly trained.

In addition, Business Continuity Management system ensures the continuity of important business processes and systems in emergency or crisis situations. The goal is to be able to continue with normal business operations within ERGO under such circumstances. This is assured by a well-defined emergency management, a proper set-up of crisis management, and adequate recovery management concepts.

C.6 Other material risks

C.6.1 Strategic Risks

Strategic risks can result from wrong business decisions or inadequate implementation of decisions already made. Additionally, we also reflect the reluctance to adjust to a changing environment (e. g. changes of the legal environment) in the strategic risks.

The key risks that might affect strategy execution are following:

- The Baltics geographical location and Russia's continued aggressive and reckless behaviour, continues to pose significant risks and heightened uncertainty which in turn deters investments to Baltic's region;
- People's finances are increasingly burdened by the rising cost of living, driven by rising prices for groceries, utilities, telecommunications, and energy. Tax changes to cover defence spending and limits on social benefits add additional burden;
- Labor markets remain tight. This is characterized by low unemployment rates and persistent labour shortages. Such conditions lead to upward pressure on wages;
- Aging of population and decreasing population puts additional strains on labour market and social security system;
- Changing regulatory expectations – we operate in a landscape of increased regulatory requirements that requires additional resources and specific competences to be addressed;
- Environmental, Social, Governance (ESG) issues – the way companies addressing the ESG factors is coming under increasing scrutiny from stakeholders (investors, regulators and consumers). Companies are anticipated to execute both: manage the risks they are directly exposed to, as well as contribute to broader sustainable economic. A failure to adequately respond to these expectations of the stakeholders can adversely impact brand and reputation.

Strategic risks are addressed by interlocking strategic decision making and risk management processes, especially with regards to preparations and decisions as part of the planning process.

As part of the Management of Strategic Risks' process, top risks are identified, evaluated by the Board of Management and discussed on Board level. If needed, appropriate measures are initiated on Board level. For these risks, a responsible person is defined who is responsible for implementing the measures.

C.6.2 Reputational risks

The reputational risk is defined as the risk arising from possible damage to the company's reputation as a result of negative public perception (e.g. by customers, business partners, authorities). Reputational risks may arise from the realization of other risks (e.g. operational risks, strategic risks, concentration risks, compliance risk or sustainability risks) and/or in connection with other risks. Litigation can also create reputational risks or result in significant reputational damage, regardless of the outcome of the matter. Reputational risks may also arise from the adverse use of artificial

intelligence. In addition, reputational risks may also arise from insuring or investing in activities that are not climate-friendly, such as those related to fossil fuels, and from greenwashing, hence, reputational risks are controlled indirectly through the control of the respective risks and risk types.

Reputational risk can occur in several of ways: directly as the result of the actions of the Company itself; indirectly due to the actions of an employee; or indirectly through other third parties.

One of the most significant sources of reputational risk for the Company arises from potential data breaches. Such incidents may result from human error, vulnerabilities or defects in IT systems, or malicious activities, including cyber-attacks or actions by rogue employees.

To mitigate the risk of data breaches, the Company continuously monitors its IT security environment and actively identifies potential vulnerabilities. Appropriate technical and organizational controls are implemented within business processes and critical functions. In addition, the Company regularly raises employee awareness regarding data protection and information security matters and performs second- and third-line control activities to ensure the effectiveness of the implemented measures.

During 2025, no data breach incidents with an impact above a minor level were recorded.

The top reputational risks are incorporated into the risk profile of the Company and reported during the quarterly risk reporting. Ad-hoc reporting processes have been implemented to ensure that (potential) reputational risks are communicated promptly.

The control functions – the Compliance function and the Internal Audit – perform the reputational risk assessment process in accordance with their own methodology and report identified real of presumable reputational risks to the Risk Management function as well as other responsible stakeholders.

C.7 Any other information

There is no other information.

D. Valuation for Solvency Purposes

D.1 Assets

D.1.1 Comparison of assets with their Solvency II values and Statutory accounts values

The following table covers information about assets that is to be given in the Quantitative Reporting Template (QRT) S.02.01, i. e. the comparison of assets with their Solvency II values and with their Statutory accounts values, that is for ERGO the IFRS values. Assets in direct conjunction with technical provisions (reinsurance recoverable) are not considered here, but in D.2.

Assets	Solvency II value 2025	Financial statements (IFRS) value 2025	Explanation
Intangible assets	0	5 972 316	Other intangible assets are only shown in the solvency balance sheet if they are both ac-counted for in IFRS and traded in an active market. The latter requirement is deemed to be met if an active market exists for similar assets. Since ERGO Life Insurance SE's intangible assets do not currently meet this requirement, this item in the solvency balance sheet is empty
Deferred tax assets	122 270	122 270	Valuation of deferred tax assets does not differ in Solvency II and Financial statements
Property, plant & equipment held for own use	2 979 299	2 979 299	SII and IFRS values are equal
Investments (other than assets held for index-linked and unit-linked contracts)	**163 956 515**	**156 810 702**	
Property (other than for own use)	0	0	
Holdings in related undertakings, including participations	11 758 906	4 677 870	Participations to affiliated companies are accounted by equity method. The difference between SII and IFRS values comes from different base values taken for the calculation, because affiliated company's SII and IFRS own funds are not equal
Bonds	134 503 361	134 503 361	Financial investments are valuated at fair value as for Solvency II purposes as for IFRS
Government Bonds	87 506 756	87 506 756	SII and IFRS values are equal
Corporate Bonds	46 952 166	46 952 166	SII and IFRS values are equal
Structured notes	44 438	44 438	SII and IFRS values are equal
Collective Investments Undertakings	17 694 248	17 629 472	No material difference between SII and IFRS values
Derivatives	0	0	
Assets held for index-linked and unit-linked contracts	114 437 061	114 437 061	SII and IFRS values are equal
Loans and mortgages	15 742 483	15 698 233	
Other loans and mortgages	15 742 483	15 698 233	Loan is presented in IFRS reporting at cost; the difference is 44 250 euros
Insurance and intermediaries receivables	10 855 556	8 460 880	In the balance sheet under IFRS Insurance and intermediaries receivables are mainly part of the Liability for Remaining Coverage, only some other insurance receivables are reported separately while under Solvency II it is still reported. At the end of the reporting period, discounting of this item for Solvency II purposes has not been required
Reinsurance receivables	275 304	0	In the balance sheet under IFRS Reinsurance receivables are part of the Liability for Remaining Coverage ceded while under Solvency II it is still reported. At the end of the reporting period, discounting of this item for Solvency II purposes has not been required
Receivables (trade, not insurance)	2 341 018	2 341 018	At the end of reporting period discounting of this item has not been required. SII and IFRS values are equal
Cash and cash equivalents	4 477 287	4 477 287	SII and IFRS values are equal
Any other assets, not elsewhere shown	158 924	158 924	Other assets, not elsewhere shown, cover all assets that cannot be allocated in any other class of assets. This includes work of arts and prepayment assets. At the end of reporting period discounting of this item has not been required
Total assets	**315 375 718**	**311 457 991**	

Table 8: Assets that is to be given in the Quantitative Reporting Template

According to the Article 75(1)(a) of Directive 2009/138/EC all assets shall be valued at the amount for which they could be exchanged between knowledgeable willing parties in an arm's length transaction, that means with their fair values.

According to IFRS a mixed measurement model is established. That means, some assets are also measured with their fair values, others are measured at amortized costs or with their par values. If the valuation basis for Solvency II and IFRS is the same, we use the same fair values for both purposes. If the valuation basis is different, we explain the differences in more detail for the respective asset classes. Only if differences between the fair values and IFRS values are immaterial, assets are measured with the latter values as explained in more detail below.

In addition to the different valuation methods used for individual items, the structure of the solvency balance sheet also differs from that of the IFRS balance sheet. Not all balance sheet items are therefore directly comparable. The differences are particularly significant for assets shown under investments. In the IFRS balance sheet, loans on policies are included in investments as "loans", whilst under Solvency II they are shown outside investments as a separate item. There are also differences in the classification of receivables and other assets, which are described under the individual items.

Where it was possible to reclassify assets as per IFRS in order to comply with the structure prescribed for the solvency balance sheet, we did so.

D.1.2 Use of judgements and estimates in recognition and measurement

Where valuation has to be based on models because no market prices are available for the calculation of the fair values required, discretion must be exercised and estimates and assumptions used, and these affects both the assets and the other liabilities shown in the solvency balance sheet.

Solvency II amounts should be determined as accurately as possible, considering all the relevant information. The basis for determining amounts is management's best knowledge regarding the items concerned at the reporting date.

Nevertheless, it is in the nature of these items that estimates may have to be adjusted in the course of time to take account of new knowledge.

D.1.3 Goodwill

No goodwill is shown in the solvency balance sheet.

Under IFRS, Goodwill resulting from the first-time consolidation of subsidiaries is tested for impairment at least annually, in accordance with IAS 36. Company additionally carry out ad-hoc impairment tests if there are indications of impairment. For impairment testing, the goodwill is allocated to the cash-generating units or groups of cash-generating units expected to derive benefit from the synergies of the business combination.

In line with accounting principles, company's IFRS balance sheet reflects zero goodwill.

D.1.4 Deferred Acquisition Costs

Acquisition costs are not shown as an asset in the solvency balance sheet but are considered in the valuation of the technical provisions.

With the introduction of IFRS 17, certain items that have previously been presented separately in our financial statements will be omitted, since the resulting cash flows are now recognised as part of the measurement models. This mainly concerns the items deferred acquisition costs and insurance-related receivables and liabilities such as accounts receivable and payable.

D.1.5 Intangible assets

Other intangible assets are only shown in the solvency balance sheet if they are both ac-counted for in IFRS and traded in an active market. The latter requirement is deemed to be met if an active market exists for similar assets. Since ERGO's intangible assets do not currently meet this requirement, this item in the solvency balance sheet is empty.

Under IFRS, other intangible assets largely include self-developed and software assets, as well as acquired distribution networks and client bases.

Intangible assets are recognized at acquisition or production cost and depreciated on a straight-line basis over their planned useful life.

D.1.6 Deferred tax assets

Under Solvency II, deferred taxes are determined pursuant to Article 15 in conjunction with Article 9 of Delegated Regulation (EU) 2015/35.

In accordance with Article 9(1) and (2) of the Delegated Regulation, assets and liabilities must be recognised and valued in accordance with IFRS requirements, provided that these are consistent with Article 75 of Directive 2009/138/EC. Therefore, under Solvency II, deferred tax assets are recognised and valued in accordance with IAS 12.

Deferred tax assets are calculated on the basis of the difference between the values ascribed to assets recognised and valued in accordance with Article 75 of Directive 2009/138/EC, and the values ascribed to assets recognised and valued for tax purposes. Deferred taxes are determined on the basis of the tax rates of the countries concerned.

Deferred tax assets are recognised in cases where asset items have to be valued lower, or liability items higher, in the solvency balance sheet than in the tax accounts of the Group company concerned, and these differences will be eliminated at a later date with a corresponding effect on taxable income (temporary differences). Also included are deferred tax assets deriving from tax loss carry-forwards.

A deferred tax asset is recognized only to the extent that it is probable that future taxable profits will be available against which the asset can be utilized. The deferred tax assets are reviewed at each reporting date and reduced to the extent it is no longer probable that the related tax benefit will be realized.

Deferred tax assets and liabilities are not discounted. The same deferred tax assets value is used for Solvency II and IFRS purposes.

D.1.7 Property, plant & equipment held for own use

For Solvency II purposes property, plant and equipment held for ERGO own use shall be valuated with their fair value. The valuation has to be performed annually. Property is not evaluated by the company itself, but appraisal service is outsourced to professional real estate appraiser.

Two methods can be used for such valuation: Sales Comparison Approach and Income Approach. The selection of a relevant methodology depends upon the nature and characteristics of the real estate under consideration and the market data available.

Choice of the valuation method/approach depends on particular property characteristics and certain market conditions. If the object is suitable for generating of the rental income, the income approach is preferable.

For Solvency II plant and equipment is – for reasons of simplification – measured with its IFRS value that means at amortized costs, subject to scheduled depreciation over the course of its useful life in accordance with the decline in its utility to the necessity of unscheduled depreciation to a lower value. The same method is applied in IFRS for property objects.

D.1.8 Investments Participations

This item comprises the associates or such entities over which the company has significant influence but not control. Significant influence is presumed to exist when the company holds directly or indirectly through subsidiaries 20-50% of an entity's voting power.

Investments in associates are accounted for using the equity method. Upon initial recognition, investments in associates are measured at cost. The cost of an investment includes directly attributable transaction charges. The financial

statements include the company's share of an associate's profit or loss from the date the significant influence commences to the date the significant influence ceases to exist.

In the Solvency II the value of participations has to be either the market price or the proportional amount of the equity of the participation.

D.1.9 Other financial assets

In the solvency balance sheet, we value all financial assets at fair value. The fair value of a financial instrument is the amount for which a financial asset could be exchanged, or a financial liability settled, between knowledgeable, willing parties in an arm's length transaction.

Where a price is quoted in active markets (i. e., a market value), it should be used. If no market value is available, valuation models are used in which observable market parameters are applied as far as possible. The same valuation principles are followed as under IFRS.

D.1.10 Determining fair values

Since market values are not available for all financial instruments, IFRS has a valuation hierarchy with three levels. Though Solvency II does not explicitly name the levels, it does provide for equivalent differentiation in the assessment of the fair values used.

The allocation reflects whether a fair value has been derived from transactions in the market or the valuation is based on models because there are no market transactions.

In the case of Level 1, valuation is based on unadjusted quoted prices in active markets for identical financial assets which ERGO can refer to at the balance sheet date. A market is deemed active if transactions take place with enough frequency and in sufficient quantity for price information to be available on an ongoing basis. Since a quoted price in an active market is the most reliable indicator of fair value, this should always be used if available. The financial instruments we have allocated to this level mainly comprise equities, investment funds (except property funds) and fixed-interest securities (bearer bonds) for which either a stock market price is available or prices are provided by a price quote on the basis of actual market transactions. We have also allocated derivatives traded on the stock market to Level 1.

Assets allocated to Level 2 are valued using models based on observable market data. For this, we use inputs directly or indirectly observable in the market, other than quoted prices. If the financial instrument concerned has a fixed contract period, the inputs used for valuation must be observable for the whole of this period. The financial instruments we have allocated to this level mainly comprise borrowers' note loans, subordinated securities and derivatives not traded on the stock market.

For assets allocated to Level 3, we use valuation techniques not based on inputs observable in the market. This is only permissible insofar as no observable market data are available. The inputs used reflect ERGO Insurance's assumptions regarding the factors which market players would consider in their pricing. We use the best available information for this, including internal company data. The financial instruments allocated to this level of the fair value hierarchy largely comprise investments in private equity, renewable energy and new technologies (RENT), certain credit structures, and investments in affiliated companies and associates measured at fair value. We also allocate insurance derivatives and derivative components that are separated from the host insurance contract to Level 3. Regularly, at each quarterly reporting date, we assess whether the allocation of our investments and liabilities to the levels of the valuation hierarchy is still appropriate. If changes in the basis of valuation have occurred – for in-stance, if a market is no longer active or the valuation was performed using parameters that make it necessary to change the allocation – we make the necessary adjustments.

D.1.11 Valuation categories according to IFRS

Pursuant to IFRS9 financial assets are classified as measured at "amortised cost", "fair value through other comprehensive income" or "fair value through profit or loss".

The classification is determined based on the business model for managing the financial assets and the contractual cash flow characteristics of the financial assets.

D.1.12 Business model

An entity's business model refers to how the entity manages the financial assets to generate cash flows. The business model is determined by management at the level of groups of financial assets; it is based on several factors, such as the risks that affect the performance of the business model and the way in which those risks are managed as well as how the performance is evaluated and reported to management. A distinction is made between the following business models:

- In the business model "hold to collect", the financial assets are held with the objective to collect contractual cash flows. The sale of financial assets is not part of the management strategy, but is, under certain circumstances, not incompatible with the application of this business model, for example if there is an increase in the financial asset's credit risk.
- The objective of the business model "hold to collect and sell" is achieved by both collecting contractual cash flows and selling financial assets. The sale of assets is a key aspect of the management of the portfolio.
- The business model "other" applies to financial assets that are managed neither under the "hold to collect" nor under the "hold to collect and sell" business models. This is the case, for example, if the objective of the business model is to realise cash flows by selling assets, or if a group of financial assets is managed based on their fair value.

D.1.13 Contractual cash flow characteristics

If financial assets are held within the business model "hold to collect" or "hold to collect and sell", an additional assessment as to whether they pass the "solely payments of principal and interest (SPPI) test" is necessary for the classification for subsequent measurement.

Contractual cash flows that are solely payments of principal and interest on the principal amount outstanding are consistent with a basic lending arrangement and pass the SPPI test.

Financial assets managed within the business model "hold to collect" that pass the SPPI test are measured at amortised cost.

Financial assets subject to the business model "hold to collect and sell" that pass the SPPI test are measured at fair value through other comprehensive income.

Financial assets that are managed under the business model "other" or that do not pass the SPPI test are measured at fair value through profit or loss.

In a basic lending arrangement, compensation for the time value of money and for the credit risk are typically the most significant elements of interest. In addition, interest may include compensation for other basic lending risks (such as liquidity risk) and costs (such as administration costs) as well as an appropriate profit margin consistent with a basic lending arrangement.

D.1.14 Impairment

IFRS 9 sets out an expected credit loss model for recognising loss allowances, under which expected credit losses are anticipated before they arise and must be recognised as an expense. These impairment requirements primarily affect financial assets measured at amortised cost or at fair value through other comprehensive income, as well as lease receivables.

A three-stage impairment model is used to recognise and measure impairment losses on financial assets.

Stage 1: On initial recognition, financial instruments are always assigned to Stage 1 of the impairment model, and they remain at Stage 1 if their credit risk has not increased significantly since they were initially recognised. The loss allowance is measured at an amount equal to the 12-month expected credit losses, which represents the expected credit losses that result from default events that may occur within 12 months of the reporting date.

Stage 2: If the credit risk of a financial instrument has increased significantly since initial recognition but there is no objective evidence of impairment, the loss allowance at Stage 2 of the impairment model is measured at an amount equal to the lifetime expected credit loss.

Stage 3: If in addition to a significant increase in credit risk, there is objective evidence of impairment, the instrument is allocated to Stage 3 of the impairment model (credit-impaired financial assets). As in Stage 2, the loss allowance is measured at an amount equal to the lifetime expected credit losses. Interest revenue is calculated by applying the effective interest method – unlike in Stage 1 and Stage 2 – based on the net carrying amount of the financial asset (i. e. after deducting the loss allowance).

As a matter of principle, a significant increase in credit risk is assumed if this risk (measured in terms of the probability of default) has increased by more than two percentage points since the financial instrument was initially recognised.

We assume that the credit risk of a financial instrument has not increased significantly if it has low credit risk as at the reporting date (low credit risk exception).

For financial instruments with an internal MEAG rating, we generally assume that changes in the risk of a default occurring over the next 12 months are a reasonable approximation of the changes in the lifetime risk of a default occurring. If there are indications that only an assessment based on the entire lifetime of the financial instrument is appropriate, such an assessment is made.

We generally make use of the rebuttable presumption that the credit risk has increased significantly since initial recognition if a contractual payment is more than 30 days past due unless we have evidence to the contrary.

Objective evidence of credit impairment includes but is not limited to:

- significant financial difficulty of the borrower;
- a breach of contract (such as a default or past due event);
- it is becoming probable that the borrower will enter bankruptcy or other financial reorganisation;
- the disappearance of an active market for the financial asset because of financial difficulties.

To measure expected credit losses, we use the probability of default, the loss given default and the exposure at default.

Expected credit losses are equal to the discounted product of these three components. The calculation includes probability-weighted scenarios that take account of reasonable and supportable information that is available without undue cost or effort as at the reporting date and incorporates past events, current conditions, and forecasts of future economic conditions.

Financial assets are written off if, based on a reasonable assessment, it must be assumed that these assets are not recoverable. Indicators for this include a debtor lacking sufficient assets to service their debts or failing to commit to a repayment schedule. Upon completion of insolvency proceedings against a debtor, the financial assets are likewise

deemed to be no longer recoverable and are fully derecognised. Such write-offs do not have an impact on profit or loss since the amounts are reflected in the loss allowance and therefore have already been recognised previously through profit or loss.

Our investment guidelines do not provide for the acquisition of purchased or originated credit-impaired financial assets.

We do not exercise the option to measure loss allowances on lease receivables using the simplified approach, i. e. at an amount equal to lifetime expected credit losses.

D.1.15 Insurance & intermediaries receivables

In the solvency balance sheet Insurance & intermediaries receivables must be measured with their fair values; compared to investments no special requirements must be considered.

Insurance and intermediaries receivables must be discounted, considering the actual risk-free interest rates as well as relevant interest rate spreads. The individual business partner's credit risk is also considered. Receivables aged less than one year should not be discounted.

For IFRS insurance & intermediaries receivables are the part of Liability for Remaining Coverage and is not presented as separate item in the balance sheet.

D.1.16 Reinsurance receivables

In the solvency balance sheet reinsurance receivables must be measured with their fair values; compared to investments, no special requirements must be considered. Reinsurance receivables must be discounted, considering the actual risk-free interest rates as well as relevant interest rate spreads. The individual business partner's credit risk is also considered.

Receivables aged less than one year should not be discounted.

For IFRS reinsurance receivables are the part of Liability for Remaining Coverage and is not presented as separate item in the balance sheet.

D.1.17 Receivables (trade, not insurance)

Under Solvency II, the Receivables (trade, not insurance) include in particular Receivables from dividends, Receivables from profit pooling or transfer agreements, receivables from taxes or other receivables. Basically, these receivables must be measured with their fair values. However, for reasons of simplification, receivables from dividends and receivables from profit pooling or transfer agreements are measured at their IFRS book value, i. e. at amortized costs. Doubtful receivables are written down to the envisaged amount attainable.

Receivables (trade, not insurance) have to be discounted, considering the actual risk-free interest rates as well as relevant interest rate spreads. The individual business partner's credit risk is also considered. Receivables aged less than one year should not be discounted.

For IFRS receivables is recognized at face value. Regular aging analysis is performed based on the time buckets (0-30 days old, 31-60 days old, 61-90 days old and older than 90 days), in case if receivable falling into time bucket older than 90 days, it should be written down immediately.

D.1.18 Cash and cash equivalents

For Solvency II, for cash the fair value is the par value. Transferable deposits (including cheques) are valued at amortized cost (usually this is the par value). Credit risk is considered by write off doubtful deposits and doubtful cheques to the envisaged amount attainable.

In IFRS, cash and cash equivalents are financial instruments and are managed within the business model "hold to collect". As a result, they are measured at amortised cost, or at their nominal value due to their short-term nature. If they do not pass the SPPI test, they are measured at fair value through profit or loss.

D.1.19 Any other assets, not elsewhere shown

Other assets, not elsewhere shown, cover all assets that cannot be allocated in any other class of assets. This includes work of arts and prepayment assets. In contrast to our Financial Reporting, in the solvency balance sheet activated deferred premium refunds are included in the valuation of the technical provisions.

As a basic principle, under Solvency II all other assets are to be measured with their fair values. However, similarly to IFRS, prepayments are calculated pro rata temporis and cover the period between the reporting date and the date the corresponding benefit is earned or becomes due. Contrary to IFRS, the prepayments are discounted, considering the actual relevant risk-free interest rate as well as relevant interest rate spreads, unless the effect from discounting is immaterial.

D.2 Technical provisions

D.2.1 Value of Technical provisions

Insurance and reinsurance undertakings have to establish technical provisions with respect to all of their insurance and reinsurance obligations towards policyholders and beneficiaries of insurance or reinsurance contracts. The value of technical provisions shall correspond to the current amount insurance and reinsurance undertakings would have to pay if they were to transfer their insurance and reinsurance obligations immediately to another insurance or reinsurance undertaking. The calculation of technical provisions shall make use of and be consistent with information provided by the financial markets and generally available data on underwriting risks (market consistency). Technical provisions shall be calculated in a prudent, reliable and objective manner. Following the principles set out above, the calculation of technical provisions is carried out as described below.

In general, the value of technical provisions is equal to the sum of a best estimate and a risk margin as set out below.

The best estimate corresponds to the probability-weighted average of future cash-flows, taking account of the time value of money (expected present value of future cash-flows), using the relevant risk-free interest rate term structure. The calculation of the best estimate is based upon up-to-date and credible information and realistic assumptions and performed using adequate, applicable and relevant actuarial and statistical methods. The cash-flow projection used in the calculation of the best estimate takes account of all the cash in- and out-flows required to settle the insurance and reinsurance obligations over the lifetime thereof. The best estimate is calculated gross, without deduction of the amounts recoverable from reinsurance contracts. Those amounts are calculated separately.

The risk margin is such as to ensure that the value of the technical provisions is equivalent to the amount that insurance and reinsurance undertakings would be expected to require in order to take over and meet the insurance and reinsurance obligations.

The best estimate and the risk margin are valued separately. The risk margin is calculated by determining the cost of providing an amount of eligible own funds equal to the Solvency Capital Requirement necessary to support the insurance and reinsurance obligations over the lifetime thereof.

The rate used in the determination of the cost of providing that amount of eligible own funds (Cost-of-Capital rate) is the prescribed rate. In addition to the cash flows outlined above, when calculating technical provisions, the following is taken account of:

1. all expenses that will be incurred in servicing insurance and reinsurance obligations;

2. inflation, including expenses and claims inflation;

3. all payments to policy holders and beneficiaries, including future discretionary bonuses, which insurance and reinsurance undertakings expect to make, whether or not those payments are contractually guaranteed.

We segment our insurance and reinsurance obligations into homogeneous risk groups, and as a minimum by lines of business, when calculating technical provisions.

Company's technical provisions for life products on Solvency II basis as at 31.12.2025 were as follows:

	Insurance with profit participation	Index-linked and unit-linked insurance			Other life insurance			Total (Life other than health insurance, incl. Unit-Linked)	Health insurance (direct business)			Total (Health similar to life insurance)
			Contracts without options and guarantees	Contracts with options and guarantees		Contracts without options and guarantees	Contracts with options and guarantees			Contracts without options and guarantees	Contracts with options and guarantees	
Technical provisions calculated as a whole	0	114 437 061			0			114 437 061	0			0
Total Recoverables from reinsurance / SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole	0	0			0			0	0			0
Technical provisions calculated as a sum of BE and RM												
Best Estimate												
Gross Best Estimate	124 887 293		0	-26 528 861		0	-13 478 368	84 880 064		0	-9 444 574	-9 444 574
Total Recoverables from reinsurance / SPV and Finite Re after the adjustment for expected losses due to counterparty default	11 252		0	-113 249		0	-4 669 936	-4 771 933		0	-1 093 263	-1 093 263
Best estimate minus recoverables from reinsurance / SPV and Finite Re – total	124 876 041		0	-26 415 612		0	-8 808 432	89 651 997		0	-8 351 310	-8 351 310
Risk Margin	1 534 198	3 849 024			590 305			5 973 527	1 150 462			1 150 462
Amount of the transitional on Technical Provisions												
Technical Provisions calculated as a whole	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
Technical provisions – total	126 421 491	91 757 224			-12 888 063			205 290 652	-8 294 112			-8 294 112

Table 9: Technical provisions for life products on Solvency II basis

Health similar to non-life technical provision is as follows:

euros	Medical expense insurance
Technical provisions calculated as a whole	0
Total Recoverables from reinsurance / SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole	0
Technical provisions calculated as a sum of BE and RM	
Best estimate	
Premium provisions	
Gross	19 739 652
Total recoverable from reinsurance / SPV and Finite Re after the adjustment for expected losses due to counterparty default	0
Net Best Estimate of Premium Provisions	19 739 652
Claims provisions	=
Gross	2 470 396
Total recoverable from reinsurance / SPV and Finite Re after the adjustment for expected losses due to counterparty default	0
Net Best Estimate of Claims Provisions	2 470 396
Total Best estimate – gross	22 210 048
Total Best estimate – net	22 210 048
Risk margin	274 973
Amount of the transitional on Technical Provisions	
Technical Provisions calculated as a whole	0
Best estimate	0
Risk margin	0
Technical provisions – total	
Technical provisions – total	22 485 021
Recoverable from reinsurance contract / SPV and Finite Re after the adjustment for expected losses due to counterparty default – total	0
Technical provisions minus recoverable from reinsurance / SPV and Finite Re – total	22 485 021

Table 10: Health similar to non-life technical provision

ERGO's financial statements meet the requirements of IFRS.

Company began recognising insurance contracts as per the provisions set out in IFRS 17, Insurance Contracts, in the 2023 financial year.

IFRS 17 is applicable to all primary insurance contracts, reinsurance contracts and investment contracts with discretionary participation features.

A contract is classified as an insurance contract within the scope of IFRS 17 if it transfers significant insurance risk.

IFRS 17 provides a consistent accounting model for all insurance contracts. A distinction is made here between insurance contracts issued if significant insurance risk is assumed, and reinsurance contracts held if significant insurance risk is ceded.

The basic measurement approach consists in applying the general measurement model (GMM), which is mainly used in life reinsurance and in parts of property-casualty primary insurance business. The measurement rules for the general measurement model are essentially based on a "building block approach", which is made up of a fulfilment cash flow

which comprises the discounted expected future cash flows and a risk adjustment for non-financial risk, and a contractual service margin.

In view of the GMM's high complexity, IFRS 17 provides the option of using – primarily for short-term contracts – a simplified measurement model known as the premium allocation approach (PAA). We apply this simplified measurement approach particularly for our health insurance business.

IFRS 17 also provides for a modified measurement model, the variable fee approach (VFA), for certain participating primary insurance contracts. Contracts fall within the VFA scope if they provide for policyholder participation in the performance of a reference value for the underlying items. The Unit-linked life insurance is a case for application of the VFA in our company. The reinsurance contracts held, and the reinsurance contracts issued are excluded from the scope of this measurement approach.

For all measurement models, there is a distinction between a pre-claims stage (liability for remaining coverage – LRC) and a claims stage after the occurrence of an insured event (liability for incurred claims – LIC).

Measurement is not made at the individual contract level, but on the basis of portfolios that are subdivided into specified groups based on their profitability and on contracts concluded in annual cohorts. Nearly all cash flows resulting from the rights and obligations under the insurance contracts must be taken into account.

Following the application of IFRS 17, deposits retained are no longer presented separately but are included in the insurance items.

The carrying amount of the LRC is – at the end of each reporting period – the sum of the present value of expected future net cash flows, the risk adjustment for non-financial risk and the contractual service margin in the GMM. If at initial recognition the present value of expected inflows exceeds the present value of expected outflows plus the risk adjustment for non-financial risk, the expected profit from the insurance cover is initially recognised as a contractual service margin and taken into account when measuring the liability for remaining coverage. On subsequent measurement, the change in the contractual service margin is recognised in the consolidated income statement as part of insurance revenue. By contrast, for groups of insurance contracts where the sum of the present value of the cash outflows and the risk adjustment for non-financial risk exceeds the present value of expected cash inflows, the expected loss is recognised directly as an expense in the loss component that is part of the present value of the expected net cash flows and the risk adjustment for non-financial risk.

Because of the special characteristics of insurance contracts with direct participation features, we consider our share of the income from the underlying items to be a variable fee, which we recognise in accordance with the requirements of the VFA. This variable fee comprises our share of the fair value of the underlying items, and is our compensation for administering and managing them. While the initial measurement of participating contracts is the same as under the GMM, special rules apply under IFRS 17 for subsequent measurement of the LRC. For example, we offset against the contractual service margin any and all effects that have an impact on the fair value of the underlying items and consequently on our variable fee.

The LRC in the PAA is determined by recognising an LRC for a group of insurance contracts, equal to the premiums received less acquisition costs paid, on initial recognition. For subsequent measurement of a profitable group of insurance contracts, the carrying amount of the LRC is updated as follows. First, the carrying amount is either increased with no impact on profit or loss by adding the further premium payments received or decreased by subtracting directly attributable acquisition costs paid – provided that we do not make use of the option to recognise the acquisition costs as an expense. The LRC is reduced by the amount of insurance revenue earned as insurance contract services are provided. We earn the insurance revenue by spreading the expected total premium for the coverage period within the contract boundaries over the accounting periods in a risk-commensurate manner. For business classified as profitable, neither the present value of the future net cash flows nor the risk adjustment for non-financial risk nor the contractual service margin is explicitly determined and recognised. By contrast and consistent with the GMM, we explicitly determine risk-adjusted net cash flows for onerous groups of insurance contracts and following the occurrence of an insured event.

The LIC comprises the payment obligations for incurred claims that have not yet been settled, and for other insurance contract services already provided. All three measurement approaches involve calculating the present value of the risk-adjusted future cash flows: it therefore comprises net cash flows, discounting and a risk adjustment for non-financial risk.

D.2.2 Uncertainty Associated with the Amount of Technical Provisions

In general, when calculating technical provisions, we take account of the value of financial guarantees and contractual options included in insurance and reinsurance policies. Any assumptions made with respect to the likelihood that policy holders will exercise contractual options, including lapses and surrenders, are realistic and based on current and credible information. The assumptions take account, either explicitly or implicitly, of the impact that future changes in financial and non-financial conditions may have on the exercise of those options.

There is a risk of insured benefits payable in life or health insurance business being higher than expected. Of particular importance are the biometric and lapse risks. We differentiate between risks that have a short-term or long-term effect on our portfolio.

Random annual fluctuations in insurance benefits or lapse behaviour can lead to short-term falls in the value of the portfolio. This applies particularly to expenses, which can rise as a result of exceptional one-off events such as a pandemic.

Changes in client biometrics or lapse behaviour are risks that have a long-term effect on the value of a portfolio, making it necessary to adjust the actuarial assumptions. In health insurance, morbidity risks are understandably important, whereas in life insurance mortality, longevity and disability risks are the most significant. Limits are laid down for the short-term pandemic scenarios and the longer-term longevity scenarios in conformity with the risk strategy.

In primary insurance, regular reviews of the actuarial assumptions by actuaries and the requisite amendment of rating rules ensure that risks and processes are effectively controlled.

D.2.3 Explanation of the qualitative differences between the methodologies used for valuation for solvency purposes and those used for valuation in financial statements

Technical provisions under Solvency II and IFRS are slightly different. The differences are provided in the table below.

	Solvency II value	Statutory accounts value	Difference
Technical provisions – non-life	22 485 021	10 582 291	-11 902 730
Technical provisions – non-life (excluding health)	0	0	0
Technical provisions calculated as a whole	0		0
Best Estimate	0		
Risk margin	0		
Technical provisions – health (similar to non-life)	22 485 021	10 582 291	-11 902 730
Technical provisions calculated as a whole	0		
Best Estimate	22 210 048		
Risk margin	274 973		
Technical provisions – life (excluding index-linked and unit-linked)	105 239 316	103 362 301	-1 877 015
Technical provisions – health (similar to life)	-8 294 112	-5 973 812	2 320 300
Technical provisions calculated as a whole	0		
Best Estimate	-9 444 574		
Risk margin	1 150 462		
Technical provisions – life (excluding health and index-linked and unit-linked)	113 533 428	109 336 113	-4 197 315
Technical provisions calculated as a whole	0		
Best Estimate	111 408 925		
Risk margin	2 124 502		
Technical provisions – index-linked and unit-linked	91 757 224	94 271 811	2 514 587
Technical provisions calculated as a whole	114 437 061		
Best Estimate	-26 528 861		
Risk margin	3 849 024		

Table 11: Differences of technical provisions under Solvency II and IFRS

The differences in valuation principles can be summarized as follows:

Definition of insurance contract and scope. In line with Solvency II, technical provisions (and reinsurance recoverables, respectively) are established for all (re)insurance contracts independent of the level of insurance risk underlying a particular contract. This means that Solvency II covers all insurance business.

Under IFRS, contracts that do not transfer significant insurance risk are generally financial instruments and are accounted for in accordance with IFRS 9 requirements. An exception here are investment contracts with discretionary participation features, which fall under the scope of IFRS 17.

Separating components from an insurance contract. Insurance contracts can contain one or more of the following components:

- embedded derivatives;
- investment components;
- non-insurance services.

If an insurance contract contains embedded derivatives that are themselves not contracts within the scope of IFRS 17, IFRS 9 requirements are applied when assessing the obligation to separate components and accounting for the given derivative.

Under Solvency II, components may not be separated.

Recognition. Under IFRS 17, a group of insurance contracts issued is recognised from the earliest of the following: the beginning of the coverage period, the date when the first payment becomes due, or the date when a group of underlying insurance contracts becomes onerous.

A group of reinsurance contracts held is recognised either at the beginning of the coverage period of the group of reinsurance contracts held, or as of the date when an onerous group of underlying insurance contracts is recognised.

Solvency II requires initial recognition at the date the (re)insurer becomes a party to the contract or the date the (re) insurance contract begins, whichever date occurs earlier.

Deposits retained, as well as receivables from, and liabilities to, reinsurers and insurers, are presented separately under Solvency II, whereas under IFRS 17, they are included in the insurance items for the groups and portfolios set up.

D.2.4 Measurement of insurance contracts

Contract boundary. Cash flows are within the boundary of an insurance contract under IFRS if they arise from substantive rights and obligations that exist during the reporting period in which the entity can compel the policyholder to pay the premiums or in which the entity has a substantive obligation to provide the policyholder with services.

The obligation to provide services ends when the entity can reassess the risks and can set a new premium that reflects those risks.

As a result, differences in the actuarial approach between IFRS 17 and Solvency II relate primarily to initial recognition, but can also affect the end of the contract for some insurance products.

Cash flows. Under IFRS 17, measuring groups of insurance contracts is based on a current estimate of all cash flows required to fulfil the contract within the contract boundary. Cash flows that need to be taken into account include premium payments, expenses for claims and benefits, acquisition and administration costs, and loss adjustment expenses.

Whereas under IFRS 17, deposits retained, as well as receivables from, and liabilities to, insurers and reinsurers, are not presented separately and are included in the cash flows, these are presented separately under Solvency II.

Discounting. Under Solvency II, we use the basic risk-free interest rates, depending on currency and maturity, when discounting technical provisions (EIOPA interest rate). As at the reporting date, we do not make use of any transitional measures regarding the relevant risk-free interest-rate term structure.

Under IFRS 17, discounting under the general measurement model to calculate technical provisions is also based on the EIOPA interest rates. At each reporting date, the fulfilment cash flows for the LRC and LIC are remeasured using the current discount rates.

Contractual service margin. For groups of insurance contracts classified as profitable at initial recognition, a contractual service margin which represents the unearned profit is recognised under IFRS 17 in the GMM and VFA. The latter is recognised over time as insurance contract services are provided over the coverage period.

By contrast, for groups of insurance contracts where the sum of the present value of future cash outflows and the risk adjustment for non-financial risk exceeds the present value of expected future cash inflows, a loss component that is part of the LRC and reflects the expected loss on initial recognition is recognised directly as an expense.

The carrying amount of the LRC is – at the end of each reporting period – the sum of the present value of expected future net cash flows, the risk adjustment for non-financial risk and the contractual service margin.

For subsequent measurement of the LRC, the discounted cash flows and risk adjustment for non-financial risk are remeasured using updated assumptions and inputs. The contractual service margin is adjusted to reflect changes in non-financial assumptions (for example assumptions regarding biometric risks or claims development) of future coverage and new business margins, among other things, and is amortised as insurance contract services are provided over time.

In Solvency II, the expected profit and expected loss from the discounted cash flows and the risk margin are recognised directly in the excess of assets over liabilities.

D.2.5 Matching adjustment

Matching adjustment referred to in Article 77b of Directive 2009/138/EC is not used.

D.2.6 Volatility adjustment

Volatility adjustment referred to in Article 77d of Directive 2009/138/EC is not used.

D.2.7 Transitional risk-free interest rate-term structure

Transitional risk-free interest rate-term structure referred to Article 308c of Directive 2009/138/EC is not used.

D.2.8 Transitional deduction

Transitional deduction referred to in Article 308d of Directive 2009/138/EC is not used.

D.2.9 Recoverables from reinsurance contracts and special purpose vehicles

The calculation of amounts recoverable from reinsurance contracts shall comply with the rules relating to technical provisions. The amounts recoverable from reinsurance contracts shall be calculated consistently with the boundaries of the underlying insurance or reinsurance contracts to which they relate.

When calculating amounts recoverable from reinsurance contracts, insurance and reinsurance undertakings shall take account of the time difference between recoveries and direct payments.

For the purpose of calculating the amounts recoverable from reinsurance contracts, the cash-flows shall only include payments in relation to compensation of insurance events and unsettled insurance claims. Payments in relation to other events or settled insurance claims shall be accounted for outside the amounts recoverable from reinsurance contracts and other elements of the technical provisions. Where a deposit has been made for the cash-flows, the amounts recoverable shall be adjusted accordingly to avoid a double counting of the assets and liabilities relating to the deposit.

The cash-flows relating to provisions for claims outstanding shall include the compensation payments relating to the claims accounted for in the gross provisions for claims outstanding of the insurance or reinsurance undertaking ceding risks. The cash-flows relating to premium provisions shall include all other payments.

D.2.10 Material changes in the assumptions made in the calculation of technical provisions compared to the previous reporting period

There have been no changes during 2025.

D.3 Other liabilities

D.3.1 Comparison of other liabilities with their Solvency II values and Statutory accounts values

The following table covers information about other liabilities that is to be given in the Quantitative Reporting Template (QRT) S.02.01, i. e. the comparison of other liabilities with their Solvency II values and with their Statutory accounts values, that is for ERGO the IFRS values.

Other liabilities	Solvency II value 2025	Financial statements (IFRS) value 2025	Explanation
Financial liabilities other than debts owed to credit institutions	2 348 593	2 348 593	SII and IFRS values are equal.
Insurance & intermediaries payables	4 177 924	1 677 577	In the balance sheet under IFRS Insurance and intermediaries payables are mainly part of the Liability for Remaining Coverage, only some other insurance receivables are reported separately while under Solvency II it is still reported. At the end of the reporting period, discounting of this item for Solvency II purposes has not been required.
Reinsurance payables	340 357	0	In the balance sheet under IFRS Reinsurance payables are part of the Liability for Remaining Coverage ceded while under Solvency II it is still reported. At the end of the reporting period, discounting of this item for Solvency II purposes has not been required.
Payables (trade, not insurance)	5 844 619	5 971 903	At the end of the reporting period, discounting of this item for Solvency II purposes has not been required. The difference between SII and IFRS data comes from the differences in presentation.
Total other liabilities	**12 711 493**	**9 998 073**	

Table 12: Other liabilities that is to be given in the Quantitative Reporting Template

According to Article 75(1) (b) of Directive 2009/138/EC all the other 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, that means with their fair values. When valuing liabilities, no adjustment to take account of the own credit standing of the insurance or reinsurance undertaking shall be made. As in general the valuation basis for Solvency II and IFRS is different, is explained the differences in more detail for the respective liabilities classes in next Chapters. Only if differences between the fair values and IFRS values are immaterial, the other liabilities are measured with the latter values as explained in more detail in Chapter D.3.3.

The statutory accounts of the undertaking (financial statements prepared under local requirements) shall be reported in the format of Solvency II. Therefore, items of the statutory financial statements shall be classified into the Solvency II split where possible.

D.3.2 Provisions other than technical provisions

Both in the solvency balance sheet and for IFRS, we produce a best estimate of the sum that would be required to settle the liabilities as at the balance sheet date, which is the amount we would reasonably have to pay to satisfy them or transfer them to a third party as at the balance sheet date. If there is a range of possible estimates having an equal degree of probability, the mid-point of the range is used. If the interest rate is a material factor, we value the provision at the present value of the expected expenditure, and if it is immaterial, we disregard it for Solvency II purposes.

D.3.3 Financial liabilities

Under Solvency II, insurance & intermediaries payables must be recognised at fair value, for IFRS, such payables a part of Liability for Remaining Coverage and are not presented as a separate item.

D.3.4 Reinsurance payables

Under Solvency II, reinsurance payables must be recognized at fair value, for IFRS, such payables a part of Liability for Remaining Coverage ceded and are not presented as a separate item.

D.3.5 Payables (trade, not insurance)

In the Solvency balance sheet, the item Payables (trade, not insurance) covers Payables from dividends, Payables from profit pooling or transfer agreements, and Payables from taxes as well as other Payables. Thus, payables (trade, not insurance) shall be measured at their reporting date fair value without considering any upsides or downsides for the own credit risk of the undertaking. However, for reasons of simplification, payables from dividends and payables from profit pooling or transfer agreements are measured at their IFRS book value, i. e. at amortized costs.

Payables from taxes and other receivables are discounted, considering the actual risk-free interest rates as well as relevant interest rate spreads. However, the undertaking's own credit risk must not be considered.

D.3.6 Any other liabilities, not elsewhere shown

Other liabilities, not elsewhere shown, cover all liabilities that cannot be allocated in any other class of liabilities. As a basic principle, under Solvency II, all other liabilities must be measured with their fair values. For IFRS such liabilities are recognized at the amount required to redeem or settle them.

D.4 Alternative methods for valuation

Alternative methods for valuation applied only for Property measurement. The valuation must be performed annually. Property is not evaluated by the company itself, but appraisal service is outsourced to professional real estate appraiser.

Two methods can be used for such valuation: Sales Comparison Approach and Income Approach. The selection of a relevant methodology depends upon the nature and characteristics of the real estate under consideration and the market data available.

D.4.1 Sales Comparison Approach

The Sales Comparison Approach compares subject property to the recently sold local similar properties. This approach compares a subject property's characteristics with those of comparable properties which have been recently sold in similar transactions. The process uses one of several techniques to adjust the prices of the comparable transactions according to the presence, absence, or degree of characteristics which influence value.

This principle holds that a prudent person would not pay more for a property than cost of acquiring an equally satisfactory substitute property, in the absence of the complicating factors of time, greater risk, or inconvenience. The Sales Comparison Approach relies upon the development of a value estimate from prices paid in the open market for properties with adequate exposure to ensure that the prices represent fair market value.

D.4.2 Income Approach

The Income Approach is based on the principle according to which the value of the real estate reflects the present value of NET income to be earned from it in the future. Methods that fall under the income approach include income capitalization and discounted cash flow analysis.

This principle holds that a prudent person would not pay more than expected monetary returns subject property can produce.

Discounted cash flow (DCF) analysis is a technique based on explicit assumptions regarding the prospective income and expenses of a property. Such assumptions pertain to the quantity, quality, variability, timing, and duration of inflows and outflows that are discounted to present value. Upon estimating the value, the following formula is used:

$$V_0 = \sum_{i=1}^{n} \frac{CF_t}{(1+i)^t} + \frac{CF_{closing}}{(1+i)^n}$$

Where:
$CF0 \ldots CFn$ – cash flow for the period (upon estimating market value – NOI (net operating income)
$CF_{closing}$ – cash flow by the end of the forecasted period (upon estimating market value – Market Value minus sales expenses)
i – discount rate (rate of return)
n – number of considered periods

Upon estimating the market value all elements of the cash flow as well as the discount rate should be market derived. The duration of the forecasted period depends on the economic environment. If the economic environment is risky, then the forecasted period is shorter and vice versa.

Choice of the valuation method/approach depends on particular property characteristics and certain market conditions. If the object is suitable for generating of the rental income, the income approach is preferable.

Both methods are widely used in the world practice and the Company considers them as reliable.

D.5 Any other information

There is no other information.

E. Capital Management

E.1 Own funds

E.1.1 Differences between IFRS equity and SII excess of assets over liabilities

Material differences between equity shown in ERGO IFRS financial statements and excess of assets over liabilities as calculated for Solvency II purposes arise from differing rules and regulations for valuation and consideration of balance sheet items.

As per Solvency II methodology, fair value principles are applied comprehensively. This means, either a market value is available and applicable (e. g. investments), or a predefined approach determines the fair value of assets and liabilities without an active market (e. g. best estimate and risk margin for technical provisions). The time value of money is considered under Solvency II and requires the discounting of cash flows, which is only the case for selected technical provisions in IFRS. In contrast to the IFRS balance sheet, the Solvency II balance sheet does not include any claims equalization provisions.

In consequence, IFRS equity and SII excess of assets over liabilities differ due to differing total balances for assets as well as liabilities in a Solvency II compliant balance sheet and an IRFS balance sheet.

Excess of assets over liabilities – attribution of valuation differences	31.12.2024	31.12.2025
Total of reserves and retained earnings from financial statements	65 303 164	70 568 288
Difference in the valuation of assets	6 831 960	3 917 727
Difference in the valuation of technical provisions	12 046 118	5 544 872
Difference in the valuation of other liabilities	-1 728 188	-2 713 420
Solvency II Excess of assets over liabilities	**82 453 054**	**77 317 468**

Table 13: Excess of assets over liabilities – attribution of valuation differences

E.1.2 Composition of own funds

In the following table presented information on the structure, amount, and quality of the available own funds at the end of the reporting period:

Basic own funds	31.12.2024	31.12.2025	Tier classification
Ordinary share capital (gross of own shares)	4 380 213	4 380 213	Tier 1 – unrestricted
Share premium account related to ordinary share capital	15 129 289	15 129 289	Tier 1 – unrestricted
Reconciliation reserve	59 324 485	54 185 696	Tier 1 – unrestricted
Net deferred tax assets	119 067	122 270	Tier 3
Total basic own funds	**78 953 054**	**73 817 468**	

Table 14: Basic own funds

E.2 Solvency Capital Requirement and Minimum Capital Requirement

E.2.1 Solvency Capital Requirement

Company's Solvency Capital Requirement as at 31.12.2025 is provided in the table below, simplified calculations are not used.

	Net solvency capital requirement	Gross solvency capital requirement	Allocation from adjustments due to RFF and Matching adjustments portfolios
Market risk	18 681 497	20 223 810	0
Counterparty default risk	2 672 322	2 672 322	0
Life underwriting risk	13 811 352	17 735 814	0
Health underwriting risk	12 032 660	12 032 660	0
Non-life underwriting risk	0	0	0
Diversification	-14 400 464	-15 922 178	
Intangible asset risk			
Basic Solvency Capital Requirement	32 797 367	36 742 429	
Adjustment due to RFF/MAP nSCR aggregation	0		
Operational risk	3 179 248		
Loss-absorbing capacity of technical provisions	-1 581 960		
Loss-absorbing capacity of deferred taxes	0		
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	0		
Solvency capital requirement, excluding capital add-on	38 339 717		
Capital add-ons already set	-		
Solvency capital requirement	38 339 717		

Table 15: Company's Solvency Capital Requirement

Undertaking-specific parameters pursuant to Article 104(7) of Directive 2009/138/EC are not used. Company's Minimum Capital Requirement is as follows:

Linear MCR	10 131 449
SCR	38 339 717
MCR cap	17 252 873
MCR floor	9 584 929
Combined MCR	10 131 449
Absolute floor of the MCR	6 700 000
Minimum Capital Requirement	10 131 449

Table 16: Company's Minimum Capital Requirement

Minimum capital requirement inputs cover the following:

	MCR components	
	Non-life activities $MCR_{(L, NL)}$ Result	Life activities $MCR_{(L, L)}$ Result
Linear formula component for non-life insurance and reinsurance obligations	3 257 467	0

Table 17: MRC components

	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	22 210 048	47 097 753	0	0
Income protection insurance and proportional reinsurance	0	0	0	0
Workers' compensation insurance and proportional reinsurance	0	0	0	0
Motor vehicle liability insurance and proportional reinsurance	0	0	0	0
Other motor insurance and proportional reinsurance	0	0	0	0
Marine, aviation and transport insurance and proportional reinsurance	0	0	0	0
Fire and other damage to property insurance and proportional reinsurance	0	0	0	0
General liability insurance and proportional reinsurance	0	0	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	0	0	0	0
Miscellaneous financial loss insurance and proportional reinsurance	0	0	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

Table 18: Background information

	MCR components	
	Non-life activities $MCR_{(L, NL)}$ Result	Life activities $MCR_{(L, L)}$ Result
Linear formula component for life insurance and reinsurance obligations	0	6 873 983

Table 19: MRC components

	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		123 294 081	
Obligations with profit participation – future discretionary benefits	0		1 581 960	
Index-linked and unit-linked insurance obligations	0		88 021 449	
Other life (re)insurance and health (re)insurance obligations	0		0	
Total capital at risk for all life (re)insurance obligations		0		2 540 304 730

Table 20: Background information

SCR values in comparison to previous period:

	Gross solvency capital requirement 2024	Gross solvency capital requirement 2025
Market risk	22 259 679	20 223 810
Counterparty default risk	2 730 366	2 672 322
Life underwriting risk	18 150 777	17 735 814
Health underwriting risk	12 061 946	12 032 660
Non-life underwriting risk	0	0
Diversification	-16 534 260	-15 922 178
Intangible asset risk	0	0
Basic Solvency Capital Requirement	38 668 508	36 742 429
Operational risk	2 956 788	3 179 248
Solvency capital requirement excluding capital add-on	40 209 619	38 339 717

Table 21: SCR values

SCR growth was due to increased circulation of risk product without savings. Another growth factor was organic changes in liability portfolios linked to current company's business strategy. SCR by modules:

Market risk

	Absolute values after shock	
	Net solvency capital requirement	Gross solvency capital requirement
Interest rate risk	2 370 295	3 962 799
interest rate down shock	0	0
interest rate up shock	2 370 295	3 962 799
Equity risk	0	0
type 1 equities	12 747 689	12 747 689
Type 1 equity other than long-term		
strategic participations (type 1 equities)		
Long-term equity investments (type 1 equities)		

	Absolute values after shock	
	Net solvency capital requirement	Gross solvency capital requirement
duration-based (type 1 equities)		
type 2 equities	11 944 452	11 944 452
Type 2 equity other than long-term		
strategic participations (type 2 equities)		
Long-term equity investments (type 2 equities)		
duration-based (type 2 equities)		
qualifying infrastructure corporate equities	0	0
qualifying infrastructure corporate equities, other than strategic and long-term	0	0
strategic participations (qualifying infrastructure corporate equities)	0	0
Long-term equity investments (qualifying infrastructure corporate equities)	0	0
qualifying infrastructure equities other than corporate	0	0
qualifying infrastructure equities other than corporate, other than strategic and long-term	0	0
strategic participations (qualifying infrastructure equities other than corporate)	0	0
Long-term equity investments (qualifying infrastructure equities other than corporate)	0	0
Property risk	0	0
Spread risk	5 161 413	6 754 625
bonds and loans	5 161 119	6 754 330
loans and bonds (qualifying infrastructure corporate investment)	0	0
loans and bonds (qualifying investment infrastructure other than infrastructure corporate)	0	0
loans and bonds (other than qualifying investment infrastructure and infrastructure corporate)	0	0
credit derivatives	0	0
downward shock on credit derivatives	0	0
upward shock on credit derivatives	0	0
Securitisation positions	0	0
Senior STS securitisation	0	0
Non-senior STS securitisation	0	0
resecuritisations	0	0
Other securitisation	0	0
Transitional type 1 securitisation	0	0
Guaranteed STS securitisation	0	0
Market risk concentrations	7 243 486	7 243 486
Currency risk	294 611	294 611
increase in the value of the foreign currency	313	313
decrease in the value of the foreign currency	294 298	294 298
Diversification within market risk module	-9 135 997	-10 779 399
Total market risk	18 681 497	20 223 810

Table 22: Market risk

Counterparty default risk

	Name of single name exposure	Code of single name exposure	Loss Given Default	Probability of Default	Net solvency capital requirement	Gross solvency capital requirement
Type 1 exposures						906 476
Single name exposure 1	Skandinaviska Enskilda Banken AB	None	2 086 061	0,005		
Single name exposure 2	Swedbank AB	None	1 118 267	0,005		
Single name exposure 3	Dummy MUC – Emittenten und Kontrahenten	None	969 951	0,005		
Single name exposure 4	Blackstone Inc.	None	568 486	0,005		
Single name exposure 5	ABN AMRO Bank N.V.	None	488 422	0,0005		
Single name exposure 6	BNP Paribas S.A.	None	435 465	0,005		
Single name exposure 7	Dummy DE – Emittenten und Kontrahenten	None	383 311	0,005		
Single name exposure 8	HSBC Holdings PLC	None	188 962	0,005		
Single name exposure 9	Luminor Bank AS	None	71 170	0,005		
Single name exposure 10	Swiss RE	549300CJ7LW6QSGIL444	9 707	0,0001		
Type 2 exposures						1 924 335
Receivables from Intermediaries due for more than 3 months			0			
All type 2 exposures other than receivables from Intermediaries due for more than 3 months			12 828 900			
Diversification within counterparty default risk module						-158 488
Total counterparty default risk					2 672 322	2 672 322

Table 23: Counterparty default risk

Life underwriting risk

	Net solvency capital requirement	Gross solvency capital requirement
Mortality risk	2 933 524	4 528 386
Longevity risk	1 620 653	1 620 653
Disability-morbidity risk	4 234 733	4 234 733
Lapse risk	8 244 551	9 836 504
risk of increase in lapse rates	8 244 551	9 836 504
risk of decrease in lapse rates	0	375 262
mass lapse risk	6 862 853	8 451 771
Life expense risk	3 668 119	5 261 331
Revision risk	0	0
Life catastrophe risk	1 416 257	3 009 166
Diversification within life underwriting risk module	-8 306 486	-10 754 959
Total life underwriting risk	13 811 352	17 735 814

Table 24: Life underwriting risk

Health underwriting risk

	Net solvency capital requirement	Gross solvency capital requirement
Health mortality risk	314 676	314 676
Health longevity risk	0	0
Health disability-morbidity risk	1 157 188	1 157 188
Medical expense	1 157 188	1 157 188
increase of medical payments	1 157 188	1 157 188
decrease of medical payments	0	0
Income protection	0	0
SLT health lapse risk	1 998 842	1 998 842
risk of increase in lapse rates	1 998 842	1 998 842
risk of decrease in lapse rates	0	0
mass lapse risk	1 998 842	1 998 842
Health expense risk	742 601	742 601
Health revision risk	0	0
Diversification within SLT health underwriting risk	-1 276 044	-1 276 044
Total SLT health underwriting risk	2 937 263	2 937 263
Diversification within NSLT health underwriting risk	0	0
Total NSLT health underwriting risk	10 042 259	0
Mass accident risk	797 658	797 658
Accident concentration risk	-	-
Pandemic risk	12 600	12 600
Diversification within health catastrophe risk	-12 500	-12 500
Total health catastrophe risk	797 757	797 757
Diversification within health underwriting risk module	-1 744 619	-1 744 619
Total health underwriting risk	12 032 660	12 032 660

Table 25: Health underwriting risk

Operational risk

	Capital requirement
Operational risk – Information on technical provisions	
Life gross technical provisions (excluding risk margin)	101 964 352
Life gross technical provisions unit-linked (excluding risk margin)	87 908 200
Non-life gross technical provisions (excluding risk margin)	22 210 048
Capital requirement for operational risk based on technical provisions	1 125 141
Operational risk – Information on earned premiums	
Earned life gross premiums (previous 12 months)	19 558 939
Earned life gross premiums unit-linked (previous 12 months)	27 781 662
Earned non-life gross premiums (previous 12 months)	45 731 790
Earned life gross premiums (12 months prior to the previous 12 months)	17 585 300
Earned life gross premiums unit-linked (12 months prior to the previous 12 months)	23 443 614
Earned non-life gross premiums (12 months prior to the previous 12 months)	42 617 598
Capital requirement for operational risk based on earned premiums	2 154 311
Operational risk – calculation of the SCR	
Capital requirement for operational risk charge before capping	2 154 311
Percentage of Basic Solvency Capital Requirement	11 022 729
Capital requirement for operational risk charge after capping	2 154 311
Expenses incurred in respect of unit linked business (previous 12 months)	0
Total capital requirement for operational risk	4 099 749

Table 26: Operational risk

E.3 Use of the duration-based equity risk sub-module in the calculation of the Solvency Capital Requirement

The company does not use duration-based equity risk sub-module.

E.4 Differences between the standard formula and any internal model used

ERGO does not use internal model for calculating solvency capital requirement.

E.5 Non-compliance with the Minimum Capital Requirement and non-compliance with the Solvency Capital Requirement

Non-compliance with Minimum Capital Requirement or Solvency Capital Requirement was not present in reporting period. There are no signs of possible non-compliance in planning horizon as well. Undertaking-specific parameters or matching adjustments are not used.

E.6 Any other information

There is no other information.

Appendices

Appendices according to Commission Implementing Regulation (EU) 2015/2452.

S.02.01.02
Balance sheet

		Solvency II value
		C0010
Assets		
Intangible assets	R0030	
Deferred tax assets	R0040	122 270
Pension benefit surplus	R0050	
Property, plant & equipment held for own use	R0060	2 979 299
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	163 956 515
Property (other than for own use)	R0080	
Holdings in related undertakings, including participations	R0090	11 758 906
Equities	R0100	
Equities – listed	R0110	
Equities – unlisted	R0120	
Bonds	R0130	134 503 361
Government Bonds	R0140	87 506 756
Corporate Bonds	R0150	46 952 166
Structured notes	R0160	44 438
Collateralized securities	R0170	
Collective Investments Undertakings	R0180	17 694 248
Derivatives	R0190	
Deposits other than cash equivalents	R0200	
Other investments	R0210	
Assets held for index-linked and unit-linked contracts	R0220	114 437 061
Loans and mortgages	R0230	15 742 483
Loans on policies	R0240	
Loans and mortgages to individuals	R0250	
Other loans and mortgages	R0260	15 742 483
Reinsurance recoverables from:	R0270	-5 865 196
Non-life and health similar to non-life	R0280	
Non-life excluding health	R0290	
Health similar to non-life	R0300	
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	-5 751 947
Health similar to life	R0320	-1 093 263
Life excluding health and index-linked and unit-linked	R0330	-4 658 684
Life index-linked and unit-linked	R0340	-113 249

		Solvency II value
		C0010
Deposits to cedants	R0350	
Insurance and intermediaries receivables	R0360	10 885 556
Reinsurance receivables	R0370	275 304
Receivables (trade, not insurance)	R0380	2 341 018
Own shares (held directly)	R0390	
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	
Cash and cash equivalents	R0410	4 477 287
Any other assets, not elsewhere shown	R0420	158 924
Total assets	R0500	**309 510 522**

		Solvency II value
		C0010
Liabilities		
Technical provisions – non-life	R0510	22 485 021
Technical provisions – non-life (excluding health)	R0520	
Technical provisions calculated as a whole	R0530	
Best Estimate	R0540	
Risk margin	R0550	
Technical provisions – health (similar to non-life)	R0560	22 485 021
Technical provisions calculated as a whole	R0570	
Best Estimate	R0580	22 210 048
Risk margin	R0590	274 973
Technical provisions – life (excluding index-linked and unit-linked)	R0600	105 239 316
Technical provisions – health (similar to life)	R0610	-8 294 112
Technical provisions calculated as a whole	R0620	
Best Estimate	R0630	-9 444 574
Risk margin	R0640	1 150 462
Technical provisions – life (excluding health and index-linked and unit-linked)	R0650	113 533 428
Technical provisions calculated as a whole	R0660	
Best Estimate	R0670	111 408 925
Risk margin	R0680	2 124 502
Technical provisions – index-linked and unit-linked	R0690	91 757 224
Technical provisions calculated as a whole	R0700	114 437 061
Best Estimate	R0710	-26 528 861
Risk margin	R0720	3 849 024
Contingent liabilities	R0740	
Provisions other than technical provisions	R0750	
Pension benefit obligations	R0760	
Deposits from reinsurers	R0770	
Deferred tax liabilities	R0780	
Derivatives	R0790	
Debts owed to credit institutions	R0800	
Financial liabilities other than debts owed to credit institutions	R0810	2 348 593
Insurance & intermediaries payables	R0820	4 177 924
Reinsurance payables	R0830	340 357
Payables (trade, not insurance)	R0840	5 844 619
Subordinated liabilities	R0850	
Subordinated liabilities not in Basic Own Funds	R0860	
Subordinated liabilities in Basic Own Funds	R0870	
Any other liabilities, not elsewhere shown	R0880	
Total liabilities	R0900	**232 193 054**
Excess of assets over liabilities	R1000	**77 317 468**

S.04.05.21
Premiums, claims and expenses by country

Non-life insurance and reinsurance obligations

		Home country	Estonia	Latvia
		C0010	C0020	C0020
Premiums written (**gross**)				
Gross Written Premium (direct)	R0020	8 201 921	5 656 815	33 238 697
Gross Written Premium (proportional reinsurance)	R0021			
Gross Written Premium (non-proportional reinsurance)	R0022			
Premiums earned (**gross**)				
Gross Earned Premium (direct)	R0030	7 047 892	5 642 844	33 110 748
Gross Earned Premium (proportional reinsurance)	R0031			
Gross Earned Premium (non-proportional reinsurance)	R0032			
Claims incurred (**gross**)				
Claims incurred (direct)	R0040	5 100 739	3 001 846	24 840 821
Claims incurred (proportional reinsurance)	R0041			
Claims incurred (non-proportional reinsurance)	R0042			
Expenses incurred (**gross**)				
Gross Expenses Incurred (direct)	R0050	1 264 349	1 384 247	6 171 066
Gross Expenses Incurred (proportional reinsurance)	R0051			
Gross Expenses Incurred (non-proportional reinsurance)	R0052			

Life insurance and reinsurance obligations

		Home country	Estonia	Latvia
		C0030	C0040	C0040
Gross Written Premium	R1020	27 228 103	3 825 519	19 286 364
Gross Earned Premium	R1030	27 228 103	3 825 519	19 286 364
Claims incurred	R1040	20 571 788	3 260 146	10 200 134
Gross Expenses Incurred	R1050	9 166 577	4 109 185	5 622 541

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

		Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)								
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090
Premiums written										
Gross – Direct Business	R0110	47 097 433								
Gross – Proportional reinsurance accepted	R0120									
Gross – Non-proportional reinsurance accepted	R0130									
Reinsurers' share	R0140	30 356								
Net	R0200	47 067 076								
Premiums earned										
Gross – Direct Business	R0210	45 801 483								
Gross – Proportional reinsurance accepted	R0220									
Gross – Non-proportional reinsurance accepted	R0230									
Reinsurers' share	R0240	30 356								
Net	R0300	45 771 127								
Claims incurred										
Gross – Direct Business	R0310	32 943 406								
Gross – Proportional reinsurance accepted	R0320									
Gross – Non-proportional reinsurance accepted	R0330									
Reinsurers' share	R0340	29 227								
Net	R0400	32 914 179								
Expenses incurred	R0550	8 819 662								
Balance – other technical expenses/income	R1210									
Total expenses	R1300									

		Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)			Line of business for: accepted non-proportional reinsurance				Total
		Legal expenses insurance	Assistance	Miscellaneous financial loss	Health	Casualty	Marine, aviation, transport	Property	
		C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0200
Premiums written									
Gross – Direct Business	R0110								**47 097 433**
Gross – Proportional reinsurance accepted	R0120								
Gross – Non-proportional reinsurance accepted	R0130								
Reinsurers' share	R0140								**30 356**
Net	R0200								**47 067 076**
Premiums earned									
Gross – Direct Business	R0210								**45 801 483**
Gross – Proportional reinsurance accepted	R0220								
Gross – Non-proportional reinsurance accepted	R0230								
Reinsurers' share	R0240								**30 356**
Net	R0300								**45 771 127**
Claims incurred									
Gross – Direct Business	R0310								**32 943 406**
Gross – Proportional reinsurance accepted	R0320								
Gross – Non-proportional reinsurance accepted	R0330								
Reinsurers' share	R0340								**29 227**
Net	R0400								**32 914 179**
Expenses incurred	R0550								**8 819 662**
Balance – other technical expenses/income	R1210								**-7 882**
Total expenses	R1300								**8 811 779**

		Line of Business for: life insurance obligations				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	Life reinsurance obligations		Total
		Health insurance	Insurance with profit participation	Index-linked and unit-linked insurance	Other life insurance			Health reinsurance	Life-reinsurance	
		C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0300
Premiums written										
Gross	R1410	4 761 721	10 939 327	30 285 717	4 353 221					**50 339 986**
Reinsurers' share	R1420	806 830	43 143	204 561	955 192					**2 009 725**
Net	R1500	3 954 891	10 896 184	30 081 157	3 398 029					**48 330 261**
Premiums earned										
Gross	R1510	4 761 721	10 939 327	30 285 717	4 353 221					**50 339 986**
Reinsurers' share	R1520	806 830	43 143	204 561	955 192					**2 009 725**
Net	R1600	3 954 891	10 896 184	30 081 157	3 398 029					**48 330 261**
Claims incurred										
Gross	R1610	1 770 918	21 591 435	10 345 516	324 200					**34 032 068**
Reinsurers' share	R1620	42 828	-2 459	0	25 964					**66 333**
Net	R1700	1 728 090	21 593 893	10 345 516	298 236					**33 965 736**
Expenses incurred	R1900	2 301 938	5 211 890	7 107 328	3 617 952					**18 239 107**
Balance – other technical expenses/income	R2510									**-50 964**
Total expenses	R2600									**18 188 143**

S.12.01.02
Life and Health SLT Technical Provisions

		Insurance with profit participation	Index-linked and unit-linked insurance			Other life insurance			Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Accepted reinsu-rance	Total (Life other than health insurance, incl. Unit-Linked)
				Contracts without options and guarantees	Contracts with options or guarantees		Contracts without options and guarantees	Contracts with options or guarantees			
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0150
Technical provisions calculated as a whole	R0010		114 437 061								**114 437 061**
Total Recoverables from reinsurance / SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole	R0020										
Technical provisions calculated as a sum of BE and RM											
Best Estimate											
Gross Best Estimate	R0030	124 887 293			-26 528 861			-13 478 368			84 880 064
Total Recoverables from reinsurance / SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0080	11 252			-113 249			-4 669 936			-4 771 933
Best estimate minus recoverables from reinsurance / SPV and Finite Re – total	R0090	124 876 041			-26 415 612			-8 808 432			89 651 997
Risk Margin	R0100	1 534 198	3 849 024			590 305					**5 973 527**
Amount of the transitional on Technical Provisions											
Technical Provisions calculated as a whole	R0110										
Best estimate	R0120										
Risk margin	R0130										
Technical provisions – total	R0200	126 421 491	91 757 224			-12 888 063					**205 290 652**

		Health insurance (direct business)			Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Health reinsurance (reinsurance accepted)	Total (Health similar to life insurance)
			Contracts without options and guarantees	Contracts with options or guarantees			
		C0160	C0170	C0180	C0190	C0200	C0210
Technical provisions calculated as a whole	R0010						
Total Recoverables from reinsurance / SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole	R0020						
Technical provisions calculated as a sum of BE and RM							
Best Estimate							
Gross Best Estimate	R0030			-9 444 574			-9 444 574
Total Recoverables from reinsurance / SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0080			-1 093 263			-1 093 263
Best estimate minus recoverables from reinsurance / SPV and Finite Re – total	R0090			-8 351 310			-8 351 310
Risk Margin	R0100	1 150 462					**1 150 462**
Amount of the transitional on Technical Provisions							
Technical Provisions calculated as a whole	R0110						
Best estimate	R0120						
Risk margin	R0130						
Technical provisions – total	R0200	-8 294 112					**-8 294 112**

S.17.01.02
Non-Life Technical Provisions

		Direct business and accepted proportional reinsurance								
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100
Total Recoverables from reinsurance / SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole	R0050									
Technical provisions calculated as a sum of BE and RM										
Best estimate										
Premium provisions										
Gross	R0060	19 739 652								
Total recoverable from reinsurance / SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140									
Net Best Estimate of Premium Provisions	R0150	19 739 652								
Claims provisions										
Gross	R0160	2 470 396								
Total recoverable from reinsurance / SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240									
Net Best Estimate of Claims Provisions	R0250	2 470 396								

		Direct business and accepted proportional reinsurance								
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100
Total Best estimate – gross	R0260	22 210 048								
Total Best estimate – net	R0270	22 210 048								
Risk margin	R0280	274 973								
Amount of the transitional on Technical Provisions										
Technical Provisions calculated as a whole	R0290									
Best estimate	R0300									
Risk margin	R0310									
Technical provisions – total										
Technical provisions – total	R0320	22 485 021								
Recoverable from reinsurance contract / SPV and Finite Re after the adjustment for expected losses due to counterparty default – total	R0330									
Technical provisions minus recoverables from reinsurance / SPV and Finite Re – total	R0340	22 485 021								

		Direct business and accepted proportional reinsurance			Accepted non-proportional reinsurance				Total Non-Life obligation
		Legal expenses insurance	Assis-tance	Miscella-neous financial loss	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance	
		C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180
Technical provisions calculated as a whole	R0010								
Total Recoverables from reinsurance / SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole	R0050								
Technical provisions calculated as a sum of BE and RM									
Best estimate									
Premium provisions									
Gross	R0060								**19 739 652**
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140								
Net Best Estimate of Premium Provisions	R0150								**19 739 652**
Claims provisions									
Gross	R0160								**2 470 396**
Total recoverable from reinsurance / SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240								**2 470 396**
Net Best Estimate of Claims Provisions	R0250								**2 470 396**

		Direct business and accepted proportional reinsurance			Accepted non-proportional reinsurance				Total Non-Life obligation
		Legal expenses insurance	Assis-tance	Miscella-neous financial loss	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance	
		C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180
Total Best estimate – gross	R0260								**22 210 048**
Total Best estimate – net	R0270								**22 210 048**
Risk margin	R0280								**274 973**
Amount of the transitional on Technical Provisions									
Technical Provisions calculated as a whole	R0290								
Best estimate	R0300								
Risk margin	R0310								
Technical provisions – total									
Technical provisions – total	R0320								**22 485 021**
Recoverable from reinsurance contract / SPV and Finite Re after the adjustment for expected losses due to counterparty default – total	R0330								
Technical provisions minus recoverables from reinsurance / SPV and Finite Re – total	R0340								

S.19.01.21
Non-life Insurance Claims Total Non-Life Business

Accident year / Underwriting year

Z0020	Accident year

Gross Claims Paid (non-cumulative) – Development year. Total Non-Life Business (absolute amount)

		Development year						Current year, sum of years (cumulative)	
		0	1	2	3	4	5	In Current year	Sum of years (cumulative)
		C0010	C0020	C0030	C0040	C0050	C0060	C0170	C0180
Prior	R0100								
N-9	R0160	17 597 499	770 885	-102					18 368 282
N-8	R0170	20 376 234	893 529	369					21 270 133
N-7	R0180	19 895 032	832 195	0					20 727 227
N-6	R0190	22 432 324	917 094	733					23 350 150
N-5	R0200	20 753 069	728 093						21 481 162
N-4	R0210	24 125 529	1 164 736						25 290 265
N-3	R0220	27 489 808	1 048 763						28 538 571
N-2	R0230	26 152 801	974 932						27 127 732
N-1	R0240	26 399 885	988 573					988 573	27 388 458
N	R0250	31 319 627						31 319 627	31 319 627
Total	R0260							32 308 200	244 861 605

Gross undiscounted Best Estimate Claims Provisions – Development year. Total Non-Life Business (absolute amount)

		Development year						Current year, sum of years (cumulative)
		0	1	2	3	4	5	Year-end (discounted data)
		C0200	C0210	C0220	C0230	C0240	C0250	C0360
Prior	R0100							
N-9	R0160	1 368 512	421	106				
N-8	R0170	1 700 560	892	336	24			
N-7	R0180	1 719 930	1 885	319				
N-6	R0190	1 727 285	2 350	222				
N-5	R0200	1 420 034	2 419	308				
N-4	R0210	1 950 410	3 867					
N-3	R0220	1 830 902	4 070					
N-2	R0230	1 808 041	2 013					
N-1	R0240	1 761 022	98 312					98 312
N	R0250	2 372 084						2 372 084
Total	R0260							2 470 396

S.23.01
Own funds

		Total	Tier 1 – unrestricted	Tier 1 – restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35						
Ordinary share capital (gross of own shares)	R0010	4 380 213	4 380 213			
Share premium account related to ordinary share capital	R0030	15 129 289	15 129 289			
Initial funds, members' contributions or the equivalent basic own – fund item for mutual and mutual-type undertakings	R0040					
Subordinated mutual member accounts	R0050					
Surplus funds	R0070					
Preference shares	R0090					
Share premium account related to preference shares	R0110					
Reconciliation reserve	R0130	54 185 695	54 185 695			
Subordinated liabilities	R0140					
An amount equal to the value of net deferred tax assets	R0160	122 270				122 270
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180					
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds						
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220					
Deductions						
Deductions for participations in financial and credit institutions	R0230					
Total basic own funds after deductions	R0290	73 817 468	73 695 198			122 270
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300					
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual – type undertakings, callable on demand	R0310					
Unpaid and uncalled preference shares callable on demand	R0320					
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330					
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340					
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350					

		Total	Tier 1 – unrestricted	Tier 1 – restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360					
Supplementary members calls – other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370					
Other ancillary own funds	R0390					
Total ancillary own funds	R0400					
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	73 817 468	73 695 198			122 270
Total available own funds to meet the MCR	R0510	73 695 198	73 695 198			
Total eligible own funds to meet the SCR	R0540	73 817 468	73 695 198			122 270
Total eligible own funds to meet the MCR	R0550	73 695 198	73 695 198			
SCR	R0580	38 339 717				
MCR	R0600	10 131 449				
Ratio of Eligible own funds to SCR	R0620	1,93				
Ratio of Eligible own funds to MCR	R0640	7,27				
Reconciliation reserve						
Excess of assets over liabilities	R0700	77 317 468				
Own shares (held directly and indirectly)	R0710					
Foreseeable dividends, distributions and charges	R0720	3 500 000				
Other basic own fund items	R0730	19 631 773				
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740					
Reconciliation reserve	R0760	54 185 695				
Expected profits						
Expected profits included in future premiums (EPIFP) – Life business	R0770	56 821 984				
Expected profits included in future premiums (EPIFP) – Non-life business	R0780					
Total Expected profits included in future premiums (EPIFP)	R0790	56 821 984				

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

Basic Solvency Capital Requirement

		Gross solvency capital	USP	Simplifications requirement
		C0110	C0090	C0100
Market risk	R0010	20 223 810		
Counterparty default risk	R0020	2 672 322		
Life underwriting risk	R0030	17 735 814		
Health underwriting risk	R0040	12 032 660		
Non-life underwriting risk	R0050			
Diversification	R006	-15 922 178		
Intangible asset risk	R0070			
Basic Solvency Capital Requirement	R0100	36 742 429		

Calculation of Solvency Capital Requirement

		C0100
Operational risk	R0130	3 179 248
Loss-absorbing capacity of technical provisions	R0140	-1 581 960
Loss-absorbing capacity of deferred taxes	R0150	
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	
Solvency capital requirement excluding capital add-on	R0200	38 339 717
Capital add-on already set	R0210	
Solvency capital requirement	R0220	38 339 717
Other information on SCR		
Capital requirement for duration-based equity risk sub-module	R0400	
Total amount of Notional Solvency Capital Requirements for remaining part	R0410	
Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420	
Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios	R0430	
Diversification effects due to RFF nSCR aggregation for article 304	R0440	

S.28.02.01
Minimum capital Requirement – Both life and non-life insurance activity MCR omponents

		MCR components	
		Non-life activities $MCR_{(NL, NL)}$ Result	Life activities $MCR_{(NL, NL)}$ Result
		C0010	C0020
Linear formula component for non-life insurance and reinsurance obligations	R0010	3 257 467	

Background information

		Background information			
		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
		C0030	C0040	C0050	C0060
Medical expense insurance and proportional reinsurance	R0020	22 210 048	47 097 753		
Income protection insurance and proportional reinsurance	R0030				
Workers' compensation insurance and proportional reinsurance	R0040				
Motor vehicle liability insurance and proportional reinsurance	R0050				
Other motor insurance and proportional reinsurance	R0060				
Marine, aviation and transport insurance and proportional reinsurance	R0070				
Fire and other damage to property insurance and proportional reinsurance	R0080				
General liability insurance and proportional reinsurance	R0090				
Credit and suretyship insurance and proportional reinsurance	R0100				
Legal expenses insurance and proportional reinsurance	R0110				
Assistance and proportional reinsurance	R0120				
Miscellaneous financial loss insurance and proportional reinsurance	R0130				
Non-proportional health reinsurance	R0140				
Non-proportional casualty reinsurance	R0150				
Non-proportional marine, aviation and transport reinsurance	R0160				
Nn-proportional property reinsurance	R0170				

Linear formula component for life insurance and reinsurance obligations

		MCR components	
		Non-life activities $MCR_{(NL, NL)}$ Result	Life activities $MCR_{(NL, NL)}$ Result
		C0070	C0080
Linear formula component for non-life insurance and reinsurance obligations	R0200	6 873 983	

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

		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
		C0090	C0100	C0110	C0120
Obligations with profit participation – guaranteed benefits	R0210			123 294 081	
Obligations with profit participation – future discretionary benefits	R0220			1 581 960	
Index-linked and unit-linked insurance obligations	R0230			88 021 449	
Other life (re)insurance and health (re)insurance obligations	R0240				
Total capital at risk for all life (re)insurance obligations	R0250				2 540 304 730

Overall MCR calculation

		C0130
Linear MCR	R0300	10 131 449
SCR	R0310	38 339 717
MCR cap	R0320	17 252 873
MCR floor	R0330	9 584 929
Combined MCR	R0340	10 131 449
Absolute floor of the MCR	R0350	6 700 000
Minimum Capital Requirement	R0400	10 131 449

Notional non-life and life MCR calculation

		Non-life activities	Life activities
		C0140	C0150
Notional linear MCR	R0500	3 257 467	6 873 983
Notional SCR excluding add-on (annual or latest calculation)	R0510	12 326 998	26 012 720
Notional MCR cap	R0520	5 547 149	11 705 724
Notional MCR floor	R0530	3 081 749	6 503 180
Notional Combined MCR	R0540	3 257 467	6 873 983
Absolute floor of the notional MCR	R0550	2 700 000	4 000 000
Notional MCR	R0560	3 257 467	6 873 983

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