



**Solvency and Financial Condition  
Report**

Global Dental Insurance, 2016

Thomas Ringsted, May 2017

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# Summary

This report follows the requirements set up in Financial Business Act (FIL) §283 and the commissions delegated regulations 2015/35/EU.

Global Dental Insurance's primary activity is insurance within classes of insurance 2: Accident and health insurance - Dental insurance.

Global Dental Insurance has an exclusive relationship with its sister company Dansk Tandforsikring Administration ApS. Dansk Tandforsikring Administration ApS acts as agent for Global Dental Insurance and provides assistance with sales, customer services and claims handling. The administration and investment management has been outsourced to service providers.

The underwriting performance is negative. This is a realistic scenario with a start-up developing insurance company. The negative result is not a result from adverse risks or a high volume of claims, but due to the high level of cost of starting up operations. Management believes that once the company has grown to a more mature level the costs will proportionally normalize to a more acceptable level.

The company's solvency position exceeds the requirements so to ensure that the company can meet all its obligations.

# A. Business and Performance

This section gives details on the business and the statutory accounts result.

## A.1 Business

Global Dental Insurance A/S ("Global Dental Insurance") is an insurance company whose primary activity is insurance within classes of insurance 2: Accident and health insurance – Dental Insurance.

The Danish Financial Supervisory Authority located on Århusgade 110, 2100 København Ø, is responsible for financial supervision of the undertaking.

The external auditor is PricewaterhouseCoopers located on Strandvejen 44, 2900 Hellerup.

The only qualifying shareholder in the company is DNS Holding Company, LLC, Okemos, Michigan, USA (TIN 46-4534401).

DNS Holding Company holds a share of 100% in the Global Dental Insurance A/S.

DNS Holding Company LLC has majority of shares of Dansk Tandforsikring Administration ApS. The sister company has a Binding Authority Agreement with Global Dental Insurance and serves as an agent for the company, providing assistance with sales, customer services and claims handling. Global Dental Insurance currently only conducts business in Denmark, but is seeking to expand to other Nordic countries.

There has been no significant business or events over the reporting period that has had a material impact on the undertaking.

## A.2 Underwriting performance

The company has only provided health insurance in Denmark. Thus there is no reason to split the result into different lines of business or geographical regions.

Since Global Dental Insurance is a start-up developing company, the negative result of the underwriting performance is to be expected due to the high level of cost of starting up operations.

	2016 DKK	2015 DKK '000
Gross premiums	10.400.750	3.929
Change in premium provisions	(1.128.141)	(1.315)
<b>Total premium income net of reinsurance</b>	<b>9.272.609</b>	<b>2.614</b>
<b>Insurance technical interest</b>	<b>(5.068)</b>	<b>(4)</b>

Claims paid	(4.367.426)	(1.169)
Change in claims provisions	(331.714)	(488)
Change in risk margin	(28.162)	(42)
<b>Total costs of claims net of reinsurance</b>	<b>(4.727.302)</b>	<b>(1.699)</b>
Acquisition costs	(4.035.247)	(824)
Administrative expenses	(1.617.324)	(1.019)
<b>Total insurance operating costs, net of reinsurance</b>	<b>(5.652.570)</b>	<b>(1.843)</b>
<b>Technical result</b>	<b>(1.112.331)</b>	<b>(932)</b>

Table 1: Technical result from both this period and the previous reporting period.

### A.3 Investment performance

The company has outsourced the investments to a professional portfolio manager to control the market risk.

All investments consist of Danish Mortgage and government bonds, with a relatively short average duration. The performance of the assets is shown in the table below.

	2016 DKK	2015 DKK '000
Interest income and dividends etc.	954.251	525
Value adjustments	(910.062)	(1.134)
Interest paid	(19.055)	(43)
Administration expenses in connection with investment activities	(138.676)	(96)
<b>Total investment return</b>	<b>(113.542)</b>	<b>(747)</b>

Table 2: Investment result from both this period and the previous reporting period.

### A.4 Performance of other activities

Global Dental Insurance has no other activities that lead to material income and expenses of the insurance undertaking.

### A.5 Any other information

Global Dental Insurance has no other material information regarding their business and performance of the insurance or reinsurance undertaking.

## B. System of Governance

The total system of governance is assessed.

### Conclusion

Based on the following it is concluded that the system of governance is adequate to the nature, scale and complexity of the risks inherent in the business of the company.

### B.1 General information on the system of governance

GDI has a very lean organizational structure with only the CEO and an internal audit function key person employed. However, substantial business review and evaluation is conducted by particular members of the Board, who are experienced executives in the dental insurance industry. The bulk of the insurance administration is handled by the agent. Deloitte assists with back office functions such as accounting, FSA reporting and the tasks of the required Solvency II functions.

The governance system and thereby the risk management system is described in the policies, guidelines and procedures recently approved by management. Most of the business is carried out through the agent DTA, where governance and risk management is set out in the Binding Authority Agreement dated 22 May 2015. Deloitte is engaged to assist with the monitoring and measurement of risk through the outsourcing agreement Regulatory Services dated 19 February 2016. The company's investment portfolio is managed by Fondsmæglerselskabet Investering & Tryghed A/S as set out in the agreement dated 7 October 2015.

The Board of Directors consists of:

- Mark Davidson (Chairman)
- Steen Bo Jørgensen
- Laura Linda Czelada
- Jonathan Stong Groat
- Toby Lincoln Hall

The key person for the compliance function, the actuarial function and the risk management function is the CEO. The key person for the internal audit function is Amy Basel.

There have been no material changes in the system of governance that have taken place over the reporting period.

Variable remuneration is not allowed. According to the signed Policy for Remuneration, dated 24 of august 2016, all board members, the CEO and all Senior Managers and Senior Staff shall be remunerated with a fixed salary, and it does not involve any kind of incentive or performance-dependent metrics.

The CEO's remuneration is assessed once a year, and is determined by the board. It shall reflect the qualifications of the CEO, with consideration to the complexity of the company, its revenue volume, growth and expansion, and other appropriate business considerations as determined by the board. The same considerations apply to the remuneration of the senior staff and senior management, except here the remuneration is determined by the CEO.

## **B.2 Fit and proper requirements**

Global Dental Insurance has specific and strict requirements for the professional competencies for the Board of directors, based on the business model and risk profile. The required competencies include:

- Local market and legal knowledge
- Understanding of the business model and corporate strategy
- Knowledge of the legal framework and requirements
- Insight into investment risks, including the components of effective risk management
- Insight into the capital requirements of the business model
- Understanding of the consequences and risks of outsourcing
- Understanding of insurance technical issues, including insurance contract law
- Understanding of accounting
- Management experience
- Knowledge of dental insurance and its particular risks
- Knowledge of the Renaissance Group

The key persons are carefully selected, with regards to the similar competence requirements relevant to the area of responsibility.

All members of the board of directors, the CEO and those responsible for the key functions are approved fit and proper by the Danish FSA.

The process for the assessment of the fitness and propriety follows the official guidelines. The persons are first evaluated through regular recruitment procedures and the official process is then initiated based on recommendation from the board of directors.

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

The Company measures risks, solvency and the minimum capital requirements pursuant to the Regulations with the standard models. Thus, neither company-specific parameters, partial or full internal model are used for measurement of risks and for calculation of the solvency capital requirement.

The Company calculates its solvency capital requirement and own funds quarterly, and it is these calculations that form the basis for the assessment of own risk and solvency (ORSA).

Risk appetite limits are set annually in connection with the ORSA process (the risk assessment and updating of capital plan). The Board of Directors monitors the risk limits quarterly, and can adjust the limits by decision of the Board of Directors.

The CEO must monitor that the risk measurement does not exceed the risk appetite and tolerance limits specified in the policies and if so report accordingly.

The risk has been divided into four categories:

- Underwriting and claims risks
- Counterparty default
- Market risk (investment risk)
- Operational risk

The Board of Directors has appointed the CEO as key person for the Risk Management Function.

The main tasks of the Risk Management Function are outsourced to Deloitte.

The Risk Management Function must immediately report any significant problems within risk management area to the CEO and must deliver an ORSA report to the CEO at least once a year.

#### **B.4 Internal control system**

The majority of the business is outsourced through different outsourcing partners. The control systems are individually handled at each partner.

##### *Administrative procedures*

The majority of administrative procedures are outsourced. The controls are handled through the quarterly reporting at the board meetings and through the mutual accessible e-room with documentation. Controls are set up through work plan descriptions, checklists signed off by preparer and reviewer, and reviews are documented with text description (4 eye-principle).

##### *Accounting procedures*

Bookkeeping and accounting are outsourced. The controls are handled through the quarterly reporting at the board meetings and through the mutual accessible e-room with documentation.

##### *Internal control structure*

The internal control structure is specified in the Binder with Dansk Tandforsikring Administration ApS.

##### *Reporting routines*

Outsourced functions report quarterly to the CEO. Reporting to the Board of Directors takes place on a quarterly basis in accordance with the annual business cycle.

#### *Compliance function*

The Compliance Function must immediately report any significant problems within the compliance area to the CEO and must deliver a report to the CEO at least once a year.

The tasks of the compliance function are outsourced to Deloitte, and the key person is the CEO.

The Internal Audit Function must inform the management of its assessment of whether the internal control system is adequate and effective. The function must report major issues to the CEO and deliver a report to the CEO at least once a year.

#### **B.5 Internal audit function**

The Internal audit function has been established in accordance with Executive order on management of insurance companies Article 17.

The CEO has appointed Amy Basel as key person for the Internal Audit Function. The tasks of the Internal Audit Function are outsourced to Deloitte.

As the tasks of the Internal Audit Function are outsourced the function is independent from the activities it reviews. Thus independence and objectivity are maintained through outsourcing.

#### **B.6 Actuarial function**

The tasks of the actuarial function are outsourced to Deloitte. The key person is the CEO, who has been appointed by the board.

The actuarial function is responsible for the calculation of the technical provisions of the Company. The actuarial function shall at least annually report to the management, the information shall include a reasoned assessment of the reliability and sufficiency of the technical provisions and the uncertainty associated with the estimates made in the calculation of technical provisions.

The full extent of the tasks of the actuarial function is described in the CEO's function description for the actuarial function.

#### **B.7 Outsourcing**

The policy for outsourcing states that all significant outsourcing contracts are to be decided by the board of Directors. Global Dental Insurance has two significant outsourcing contracts, one with Fondsmæglerselskabet Investerings & Tryghed A/S regarding the management of the portfolio of investment assets and one on regulatory services with Deloitte Statsautoriseret Revisionspartnerselskab. Deloitte assists with back office functions such as salary administration, accounting, FSA reporting and the tasks of the required Solvency II functions.

#### **B.8 Any other information**

Global Dental Insurance has no other material information regarding the system of governance of the insurance or reinsurance undertaking.

## C. Risk profile

This section describes the risk profile for the underlying risk modules. For the full overview of the solvency capital requirement, see Chapter E. Capital Management.

### C.1 Underwriting risk

The underwriting risk in Global Dental Insurance consists of premium- and reserve risk stemming from Health insurance. The solvency capital requirement for premium and reserve risk amounts to 3,5 m DKK as measured by the standard formula. The primary risk driver is the premium budget.

As Global Dental Insurance has no reinsurance agreements, the net risk equals the gross risk.

The catastrophe risk does not apply to Global Dental Insurance, as per the definitions in the Solvency II technical standards, and according to the own risk and solvency assessment (ORSA) of Global Dental Insurance.

The risk mitigation is evaluated at least annually as part of the ORSA-process and in the annual revaluation of the policies in the Governance system.

### C.2 Market risk

The market risk in Global Dental Insurance consists solely of interest risk and spread risk stemming from the technical provisions and the investment assets. The solvency capital requirement for market risk amounts to 1,0 m DKK as measured by the standard formula. The primary risk driver is the investment assets and hence the worst scenario for Global Dental Insurance is increase in the interest rate.

The company has outsourced the investments to a professional portfolio manager to control the market risk. The investment assets consist of Danish mortgage and government bonds.

According to the standard formula, Global Dental Insurance has no concentration risk. This corresponds with the investment assets being placed evenly in 5 different credit institutions in high rated bonds and in government bonds.

Global Dental Insurance has specified limits and guidelines in the policy for investment specifically to ensure that policyholders and beneficiaries' interests are held best possible to comply with the Prudent Person principle. The guidelines are designed to reduce risk and ensure a solid solvency ratio throughout the capital planning period. Restrictions are set to ensure a portfolio of non-complex assets and Global Dental Insurance has engaged a portfolio manager to ensure these guidelines.

### **C.3 Credit risk**

The credit risk consists of counterparty risk which stems from Type 1 counterparties relating to cash and drawn bonds and type 2 counterparties which relates to receivables from policyholders and receivables from the sister company.

The solvency capital requirement for counterparty risk amounts to 0,9 m DKK as measured by the standard formula. The primary risk driver is the receivables from policyholders.

### **C.4 Liquidity risk**

The liquidity risk of Global Dental Insurance is minimal, as the investments assets are placed in cash and easily convertible bonds.

Global Dental Insurance does not have any expected profit included in future premiums in the financial statements as the premium provisions are calculated on a pro rata basis, according to BEK §69 a<sup>1</sup>.

### **C.5 Operational risk**

The operational risk in Global Dental Insurance can take the form of organizational, technical, IT and procedural risks.

The solvency capital requirement for operational risk amounts to 0,5 m DKK as measured by the standard formula. The primary risk drivers are the earned premium and the growth in earned premium.

### **C.6 Other material risk**

All potential material risks are assessed at least annually in the ORSA-process. The evaluation concludes that these risks do not impair the solvency in the capital planning period, and they are therefore not considered material.

### **C.7 Any other information**

#### **Sensitivity analysis**

Global Dental Insurance performs quarterly stress tests on spread risk and premium growth, which are the primary potential risk drivers. On a yearly basis related to the ORSA and capital planning process a variety of stress tests, reverse stress tests and scenario analysis are performed, primarily regarding claims ratio, premium growth and interest rate. The analysis is performed by adjusting the parameters in the capital plan.

The conclusions of the analysis are that the Global Dental Insurance has a strong capital position, and the scenarios or stresses to impair the solvency of the company in the planning period are not very likely.

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<sup>1</sup> Executive Order nr. 937 of 27th July 2015 on financial reports for insurance companies and pension funds, as changed 1st June 2016 by bkg nr. 688.

# D. Valuation for Solvency Purposes

This section describes the Valuation for Solvency purposes.

## D.1 Assets

The basis, methods and primary assumptions that the company uses for solvency purposes are the same as those used for accounting purposes.

For all listed investments, a market price is determined based on official data from the stock exchanges where the assets are listed.

## D.2 Technical provisions

The technical provisions are calculated in 3 parts, premium provisions, claims provisions and risk margin.

The basis, methods and primary assumptions that the company uses for solvency purposes are the same as those used for accounting purposes.

### Premium provisions method

#### Pro rata temporis

Pro rata temporis is the method used to calculate the premium provisions with an assumption of a stable exposure over time. The method is based on the premium is earned linearly in the period of the insurance contract period. According to Danish accounting standards, the earned premium can be calculated before or after deduction of acquisition costs. The premium provisions in GDI are based on gross premiums including/before deduction of acquisition costs, which is common market practice for the chosen accounting option.

#### Legislation

The premium provisions are calculated on a pro rata basis, according to BEK §69 a<sup>2</sup>, and therefore there is no contractual service margin (DK: Fortjenstmargen). This is in line with Solvency II, as implemented in "Executive Order of valuation of assets and liability, including technical provisions."<sup>3</sup>

### Claims provisions method

This section describes the methods used for calculating the claims provisions.

#### Chain Ladder on paid claims

The company uses a chain ladder method on the paid triangle for calculating the expected future payments. The method uses the observed paid claims and assumes that the historical development is a good measure

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<sup>2</sup> Executive Order nr. 937 of 27th July 2015 on financial reports for insurance companies and pension funds, as changed 1st June 2016 by bkg nr. 688.

<sup>3</sup> Executive Order nr. 1760 of 15th December 2016 on valuation of assets and liabilities, including technical provisions.

for future developments. The claims provisions are solely calculated based on a chain ladder on the observed paid triangle.

This method is considered sufficient and robust considering the simplicity and pace of the development.

#### **Tail estimation**

Because of limited data a manual tail of 5% was used during the year. With more data the analysis showed that this was a pessimistic assumption and at 12/31/2016 this tail was reduced to the result of a Weibull fit, very close to 0%.

This change and assumption is considered adequate.

#### **Bootstrap**

Bootstrap is a method used to assess the uncertainty of the provision estimate. The method illustrates the probabilities for different results based on the simulations of the volatility in the data used. The method does not consider model uncertainties.

This method is commonly used and hence considered appropriate.

#### **Risk margin**

Risk margin is calculated by level 4 in the simplifications hierarchy in the solvency II guidelines<sup>4</sup>, where the risk margin is calculated as a percentage of the total reserves.

The valuation for solvency purposes is the same as the valuation in the financial statements.

Global Dental Insurance does not use volatility adjustment or any of the transitional measures described in Article 308 of Directive 2009/138/EC.

As of 31.12.2016 the total technical provisions amount to 3,3 mDKK.

<b>Technical provisions</b>	<b>2015 (kDKK)</b>	<b>2016 (kDKK)</b>
Premium provisions	1.315	2.444
Claims provisions	488	820
Risk margin	42	70
<b>Total provisions for insurance contracts</b>	<b>1.845</b>	<b>3.334</b>

Table 3: Total provisions for insurance contract as presented in the annual report.

To assess the sensitivity within the claims provisions a bootstrap analysis has been performed. The results can be viewed in Figure 1, where the empirical density and distribution are presented.

<sup>4</sup> EIOPA-BoS-14, Guidelines on the valuation of technical provisions.

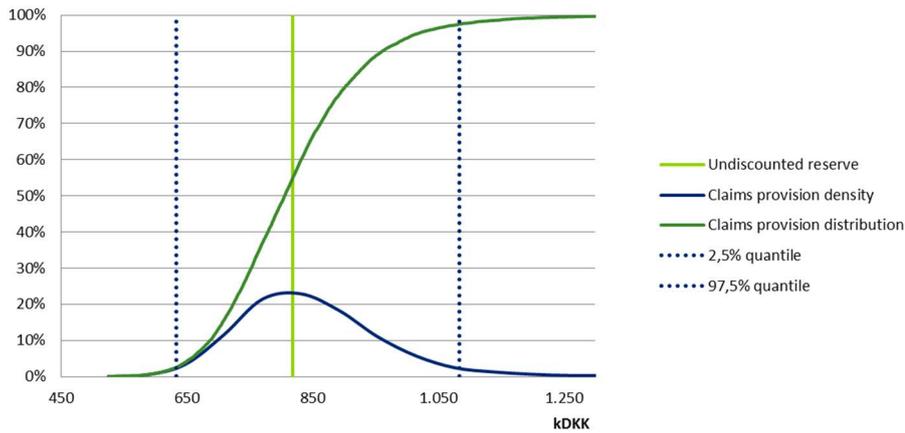


Figure 1: Sensitivity analysis based on paid data.

Figure 1 shows that the booked provisions correspond with the 55% quantile. This can be interpreted such that the provisions with a probability of 55% are sufficient. It can also be noted that the distribution is skewed to the right. The booked provisions constitutes a mean. The uncertainty is considered moderate and the estimate adequate for both the accounting and SII framework.

### D.3 Other liabilities

Global Dental Insurance does not have any material other liabilities.

### D.4 Alternative methods for valuation

Global Dental Insurance does not use any alternative methods for valuation.

### D.5 Any other information

Global Dental Insurance does not have any other material information regarding the valuation of assets and liabilities for solvency purposes.

# E. Capital Management

This section describes the Capital Management in Global Dental Insurance.

## E.1 Own funds

Own funds in Global Dental Insurance is determined according to Solvency II.

Own funds as of 31.12.2016 is 39.006.696 DKK, and the entire own funds is classified as tier 1. The own funds are split on tiers and different elements in S.23.01.01 (see Appendix: QRT's).

If the own funds cause the solvency ratio to be below the limits determined by the board, the capital contingency plan will take effect in order to increase the solvency ratio.

## E.2 Solvency Capital Requirement and Minimum Capital Requirement

The solvency capital requirement is measured by the standard formula.

	2016 DKK	2015 DKK '000
Own funds	39.006.696	39.810
Solvency capital requirement	3.625.248	6.947
Minimum capital requirement	18.750.000	18.750

Table 4: Solvency capital requirement.

And split on the underlying modules the solvency capital requirement is the following

	2016 DKK
Market risk	1.026.884
Counterparty risk	864.562
Health risk	3.463.637
Diversification	(1.169.598)
<b>Subtotal (BSCR)</b>	<b>4.185.485</b>
Operational risk	462.269
Loss absorbing effect	(1.022.506)
<b>Solvency Capital Requirement</b>	<b>3.625.248</b>

Table 4: Solvency capital requirement divided on submodules.

Global Dental Insurance does not use any simplifications or undertaking specific parameters in the calculation of the solvency capital requirement.

The minimum capital requirement is calculated according to article 250 in the Delegated regulation (EU) 2015/35, with the boundaries described in article 248. The result for the linear component is below the absolute floor of the minimum capital requirement, as noted in the table above.

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

The company does not use the option set out in Article 304 of Directive 2009/138/EC of using a duration-based equity risk sub-module for the calculation of its Solvency Capital Requirement.

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

GDI uses the standard model as described in the Commission Delegated Regulation (EU) 2015/35 of 10 October 2014 for calculation of Solvency Capital Requirement on a one-year basis.

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

During the reporting period the company has been compliant with both the minimum capital requirement and the solvency capital requirement.

### **E.6 Any other information**

Global Dental Insurance does not have any other material information regarding the capital management of the insurance or reinsurance undertaking.

# 1 Appendix: QRT's

## S.02.01.02 – Balance sheet

		<b>Solvency II value</b>
		C0010
<b>Assets</b>		
<b>Goodwill</b>	R0010	
<b>Deferred acquisition costs</b>	R0020	
<b>Intangible assets</b>	R0030	
<b>Deferred tax assets</b>	R0040	
<b>Pension benefit surplus</b>	R0050	
<b>Property, plant &amp; equipment held for own use</b>	R0060	
<b>Investments (other than assets held for index-linked and unit-linked contracts)</b>	R0070	35706844
<b>Property (other than for own use)</b>	R0080	
<b>Holdings in related undertakings, including participations</b>	R0090	
<b>Equities</b>	R0100	
<b>Equities - listed</b>	R0110	
<b>Equities - unlisted</b>	R0120	
<b>Bonds</b>	R0130	35706844
<b>Government Bonds</b>	R0140	10969963
<b>Corporate Bonds</b>	R0150	24736881
<b>Structured notes</b>	R0160	
<b>Collateralised securities</b>	R0170	
<b>Collective Investments Undertakings</b>	R0180	
<b>Derivatives</b>	R0190	
<b>Deposits other than cash equivalents</b>	R0200	
<b>Other investments</b>	R0210	
<b>Assets held for index-linked and unit-linked contracts</b>	R0220	
<b>Loans and mortgages</b>	R0230	
<b>Loans on policies</b>	R0240	
<b>Loans and mortgages to individuals</b>	R0250	
<b>Other loans and mortgages</b>	R0260	
<b>Reinsurance recoverables from:</b>	R0270	
<b>Non-life and health similar to non-life</b>	R0280	
<b>Non-life excluding health</b>	R0290	
<b>Health similar to non-life</b>	R0300	

<b>Life and health similar to life, excluding health and index-linked and unit-linked</b>	R0310	
<b>Health similar to life</b>	R0320	
<b>Life excluding health and index-linked and unit-linked</b>	R0330	
<b>Life index-linked and unit-linked</b>	R0340	
<b>Deposits to cedants</b>	R0350	
<b>Insurance and intermediaries receivables</b>	R0360	2601057
<b>Reinsurance receivables</b>	R0370	
<b>Receivables (trade, not insurance)</b>	R0380	2039241
<b>Own shares (held directly)</b>	R0390	0
<b>Amounts due in respect of own fund items or initial fund called up but not yet paid in</b>	R0400	
<b>Cash and cash equivalents</b>	R0410	5696474
<b>Any other assets, not elsewhere shown</b>	R0420	0
<b>Total assets</b>	R0500	46043616
<b>Liabilities</b>		
<b>Technical provisions – non-life</b>	R0510	3333292
<b>Technical provisions – non-life (excluding health)</b>	R0520	
<b>Technical provisions calculated as a whole</b>	R0530	
<b>Best Estimate</b>	R0540	
<b>Risk margin</b>	R0550	
<b>Technical provisions - health (similar to non-life)</b>	R0560	3333292
<b>Technical provisions calculated as a whole</b>	R0570	
<b>Best Estimate</b>	R0580	3263628
<b>Risk margin</b>	R0590	69664
<b>Technical provisions - life (excluding index-linked and unit-linked)</b>	R0600	
<b>Technical provisions - health (similar to life)</b>	R0610	
<b>Technical provisions calculated as a whole</b>	R0620	
<b>Best Estimate</b>	R0630	
<b>Risk margin</b>	R0640	
<b>Technical provisions – life (excluding health and index-linked and unit-linked)</b>	R0650	
<b>Technical provisions calculated as a whole</b>	R0660	
<b>Best Estimate</b>	R0670	
<b>Risk margin</b>	R0680	
<b>Technical provisions – index-linked and unit-linked</b>	R0690	
<b>Technical provisions calculated as a whole</b>	R0700	
<b>Best Estimate</b>	R0710	
<b>Risk margin</b>	R0720	
<b>Other technical provisions</b>	R0730	
<b>Contingent liabilities</b>	R0740	
<b>Provisions other than technical provisions</b>	R0750	
<b>Pension benefit obligations</b>	R0760	
<b>Deposits from reinsurers</b>	R0770	
<b>Deferred tax liabilities</b>	R0780	

<b>Derivatives</b>	R0790	
<b>Debts owed to credit institutions</b>	R0800	
<b>Financial liabilities other than debts owed to credit institutions</b>	R0810	
<b>Insurance &amp; intermediaries payables</b>	R0820	1727365
<b>Reinsurance payables</b>	R0830	
<b>Payables (trade, not insurance)</b>	R0840	
<b>Subordinated liabilities</b>	R0850	
<b>Subordinated liabilities not in Basic Own Funds</b>	R0860	
<b>Subordinated liabilities in Basic Own Funds</b>	R0870	
<b>Any other liabilities, not elsewhere shown</b>	R0880	1976263
<b>Total liabilities</b>	R0900	7036921
<b>Excess of assets over liabilities</b>	R1000	39006695

#### s.05.01.02 – Non-life & Accepted non-proportional reinsurance

		<b>Medical expense insurance</b>	<b>Total</b>
		C0010	C0200
<b>Premiums written</b>			
<b>Gross - Direct Business</b>	R0110	10400750	10400750
<b>Gross - Proportional reinsurance accepted</b>	R0120	0	0
<b>Gross - Non-proportional reinsurance accepted</b>	R0130		0
<b>Reinsurers' share</b>	R0140	0	0
<b>Net</b>	R0200	10400750	10400750
<b>Premiums earned</b>			
<b>Gross - Direct Business</b>	R0210	9272609	9272609
<b>Gross - Proportional reinsurance accepted</b>	R0220	0	0
<b>Gross - Non-proportional reinsurance accepted</b>	R0230		0
<b>Reinsurers' share</b>	R0240	0	0
<b>Net</b>	R0300	9272609	9272609
<b>Claims incurred</b>			
<b>Gross - Direct Business</b>	R0310	4699140	4699140
<b>Gross - Proportional reinsurance accepted</b>	R0320	0	0
<b>Gross - Non-proportional reinsurance accepted</b>	R0330		0
<b>Reinsurers' share</b>	R0340	0	0
<b>Net</b>	R0400	4699140	4699140
<b>Changes in other technical provisions</b>			
<b>Gross - Direct Business</b>	R0410	0	0
<b>Gross - Proportional reinsurance accepted</b>	R0420	0	0
<b>Gross - Non-proportional reinsurance accepted</b>	R0430		0

<b>Reinsurers' share</b>	R0440	0	0
<b>Net</b>	R0500	0	0
<b>Expenses incurred</b>	R0550	5652570	5652570
<b>Other expenses</b>	R1200		0
<b>Total expenses</b>	R1300		5652570

#### S.17.01.02 – Non-life Technical provisions

		<b>Medical expense insurance</b>	<b>Total</b>
		C0020	C0180
<b>Technical provisions calculated as a whole</b>	R0010	0	0
<b>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</b>	R0050	0	0
<b>Technical provisions calculated as a sum of BE and RM</b>			
<b>Best estimate</b>			
<b>Premium provisions</b>			
<b>Gross</b>	R0060	2444048	2444048
<b>Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default</b>	R0140	0	0
<b>Net Best Estimate of Premium Provisions</b>	R0150	2444048	2444048
<b>Claims provisions</b>			
<b>Gross</b>	R0160	819580	819580
<b>Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default</b>	R0240	0	0
<b>Net Best Estimate of Claims Provisions</b>	R0250	819580	819580
<b>Total Best estimate - gross</b>	R0260	3263628	3263628
<b>Total Best estimate - net</b>	R0270	3263628	3263628
<b>Risk margin</b>	R0280	69664	69664
<b>Amount of the transitional on Technical Provisions</b>			
<b>Technical Provisions calculated as a whole</b>	R0290	0	0
<b>Best estimate</b>	R0300	0	0
<b>Risk margin</b>	R0310	0	0
<b>Technical provisions - total</b>			
<b>Technical provisions - total</b>	R0320	3333292	3333292
<b>Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total</b>	R0330	0	0

<b>Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total</b>	R0340	3333292	3333292
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## S.23.01.01 – Own funds

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
<b>Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35</b>						
Ordinary share capital (gross of own shares)	R0010	42000000	42000000			
Share premium account related to ordinary share capital	R0030	0	0			
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040	0	0			
Subordinated mutual member accounts	R0050	0				
Surplus funds	R0070	-2993304	-2993304			
Preference shares	R0090	0				
Share premium account related to preference shares	R0110	0				
Reconciliation reserve	R0130	0	0			
Subordinated liabilities	R0140	0				
An amount equal to the value of net deferred tax assets	R0160	0				
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180	0	0			
<b>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</b>						
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220	0				
<b>Deductions</b>						
Deductions for participations in financial and credit institutions	R0230	0	0			
<b>Total basic own funds after deductions</b>	R0290	39006696	39006696			
<b>Ancillary own funds</b>						
Unpaid and uncalled ordinary share capital callable on demand	R0300	0				
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310	0				
Unpaid and uncalled preference shares callable on demand	R0320					
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330					
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340					
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350					
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360					
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370					
Other ancillary own funds	R0390	0				
<b>Total ancillary own funds</b>	R0400	0				
<b>Available and eligible own funds</b>						
Total available own funds to meet the SCR	R0500	39006696	39006696			
Total available own funds to meet the MCR	R0510	39006696	39006696			
Total eligible own funds to meet the SCR	R0540	39006696	39006696			

<b>Total eligible own funds to meet the MCR</b>	R0550	39006696	39006696			
<b>SCR</b>	R0580	3625248				
<b>MCR</b>	R0600	18750000				
<b>Ratio of Eligible own funds to SCR</b>	R0620	1075,9732%				
<b>Ratio of Eligible own funds to MCR</b>	R0640	208,0357%				

### S.25.01 - Solvency Capital Requirement - for undertakings on Standard Formula

Article 112	Z0010	No	{s2c_AO:x0}
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		Net solvency capital requirement	Gross solvency capital requirement	Allocation from adjustments due to RFF and Matching adjustments portfolios
		C0030	C0040	C0050
Market risk	R0010	1026883,90	1026883,90	
Counterparty default risk	R0020	864561,53	864561,53	
Life underwriting risk	R0030			
Health underwriting risk	R0040	3463637,30	3463637,30	
Non-life underwriting risk	R0050			
Diversification	R0060	-1169597,91	-1169597,91	
Intangible asset risk	R0070			
<b>Basic Solvency Capital Requirement</b>	<b>R0100</b>	<b>4185484,82</b>	<b>4185484,82</b>	

		Value
		C0100
Adjustment due to RFF/MAP nSCR aggregation	R0120	
Operational risk	R0130	462269,12
Loss-absorbing capacity of technical provisions	R0140	
Loss-absorbing capacity of deferred taxes	R0150	-1022505,87
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	
Solvency Capital Requirement excluding capital add-on	R0200	3625248,08
Capital add-on already set	R0210	
Solvency capital requirement	R0220	3625248,08
Other information on SCR		
Capital requirement for duration-based equity risk sub-module	R0400	
Total amount of Notional Solvency Capital Requirements for remaining part	R0410	
Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420	
Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	R0430	

Diversification effects due to RFF nSCR aggregation for article 304	R0440	
Method used to calculate the adjustment due to RFF/MAP nSCR aggregation	R0450	
Net future discretionary benefits	R0460	

#### S.28.01.01 – Linear formula component for non-life insurance and reinsurance obligations

		<b>MCR components</b>
		C0010
<b>MCRNL Result</b>	R0010	642226,00



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