

<b>Comments Template on EIOPA-CP-14-045 Draft proposal for Guidelines on reporting for financial stability purposes</b>		<b>Deadline 02.Mar.2015 23:59 CET</b>
Company name:	RSA Insurance Group plc	
Disclosure of comments:	EIOPA will make all comments available on its website, except where respondents specifically request that their comments remain confidential.  Please indicate if your comments on this CP should be treated as confidential, by deleting the word Public in the column to the right and by inserting the word Confidential.	Public
<p>Please follow the instructions for filling in the template:</p> <ul style="list-style-type: none"> <li>⇒ <u>Do not change the numbering</u> in column "Reference".</li> <li>⇒ Please fill in your comment in the relevant row. If you have <u>no comment</u> on a paragraph, keep the row <u>empty</u>.</li> <li>⇒ Our IT tool does not allow processing of comments which do not refer to the specific paragraph numbers below. <ul style="list-style-type: none"> <li>○ If your comment refers to multiple paragraphs, please insert your comment at the first relevant paragraph and mention in your comment to which other paragraphs this also applies.</li> <li>○ If your comment refers to sub-bullets/sub-paragraphs, please indicate this in the comment itself.</li> </ul> </li> </ul> <p><b>Please send the completed template to <a href="mailto:Consultation_Set2@eiopa.europa.eu">Consultation_Set2@eiopa.europa.eu</a>, in <u>MSWord Format</u>, (our IT tool does not allow processing of any other formats).</b></p> <p>The paragraph numbers below correspond to Consultation Paper No. EIOPA-CP-14-045.</p>		
Reference	Comment	
General Comment	<p>We should like to express our appreciation to EIOPA for having produced such an extensive package. The package does provide much clarification where previously there was little; and it serves to provide a very useful basis to help firms prepare for SII implementation.</p> <p>As per EIOPA's request, our comments are restricted only to those areas which have seen changes from what was consulted upon in CPs 11/009 and 11/011.</p>	

**Comments Template on EIOPA-CP-14-045  
Draft proposal for Guidelines  
on reporting for financial stability purposes**

**Deadline  
02.Mar.2015  
23:59 CET**

Introduction		
Guideline 1		
Guideline 2		
Guideline 3		
Guideline 4		
Guideline 5		
Guideline 6		
Guideline 7		
Guideline 8		
Guideline 9		
Guideline 10		
Guideline 11		
Guideline 12		
Guideline 13		
Guideline 14		
Guideline 15		
Guideline 16		
Guideline 17		
Guideline 18		
Guideline 19		
Guideline 20		
Guideline 21		
Guideline 22		
Guideline 23		
Annex 1: IA		

**Comments Template on EIOPA-CP-14-045  
Draft proposal for Guidelines  
on reporting for financial stability purposes**

**Deadline  
02.Mar.2015  
23:59 CET**

Section 1		
Annex 1: IA Section 2		
Annex 1: IA Section 3		
Annex 1: IA Section 4		
Annex 1: IA Section 5		
Annex 1: IA Section 6		
Annex 1: IA Section 7		
Technical Annex A - Content-S.01.01.c		
Technical Annex A - BI- S.01.02.c		
Technical Annex A - AS- D4-S.06.03.c		
Technical Annex A - AS- D3-S.09.01.c		
Technical Annex A - AS- D5-S.10.01.c		
Technical Annex A - S.25.04.c		
Technical Annex A - Re- J3-S.31.01.c		

<b>Comments Template on EIOPA-CP-14-045 Draft proposal for Guidelines on reporting for financial stability purposes</b>		<b>Deadline 02.Mar.2015 23:59 CET</b>
Technical Annex A - P&L-S.39.01.c		
Technical Annex A - Lapses-S.41.01.c		
Technical Annex A - Content-S.01.01.d		
Technical Annex A - BI-S.01.02.d		
Technical Annex A - TP - F3-S.14.01.d		
Technical Annex A - Re-J2_basic-S.30.03.d		
Technical Annex A - Re-J2_shares-S.30.04.d		
Technical Annex A - Duration L-S_38.01.d		
Technical Annex A - PL sharing-S.40.01.d		
Technical Annex A - Content-S.01.01.h		
Technical Annex A - BI-S.01.02.h		
Technical Annex A - BS-S.02.01.h		
Technical Annex A - Cover-A1Q-S.05.01.h		
Technical Annex A - Assets-D1-S.06.02.h		

<b>Comments Template on EIOPA-CP-14-045 Draft proposal for Guidelines on reporting for financial stability purposes</b>		<b>Deadline 02.Mar.2015 23:59 CET</b>
Technical Annex A - AS-D4-S.06.03.h		
Technical Annex A - AS-D20-S.08.01.h		
Technical Annex A - AS-D3-S.09.01.h		
Technical Annex A - AS-D5-S.10.01.h		
Technical Annex A - OF - B1Q-S.23.01.h		
Technical Annex A - S.25.04.h		
Technical Annex A - Re-J3-S.31.01.h		
Technical Annex A - P&L-S.39.01.h		
Technical Annex A - Lapses-S.41.01.h	We believe this ought to apply only to direct business, as reinsurance business is not likely to lapse. Further, non-life annuities also ought to be excluded, again because they are not likely to lapse.	
Technical Annex A - Content-S.01.01.i		
Technical Annex A - BI-S.01.02.i		
Technical Annex A - TP - F3-S.14.01.i		
Technical Annex A - Re-J2_basic-S.30.03.i		
Technical Annex A - Re-J2_shares-S.30.04.i		

**Comments Template on EIOPA-CP-14-045  
Draft proposal for Guidelines  
on reporting for financial stability purposes**

**Deadline  
02.Mar.2015  
23:59 CET**

Technical Annex A - Duration L-S_38.01.i		
Technical Annex A - PL sharing-S.40.01.i		
Technical Annex B - S_01_01_h_i_LOG		
Technical Annex B - S_01_02_h_i_LOG		
Technical Annex B - S_14_01_d_i_LOG		
Technical Annex B - S_30_03_d_i_LOG	There are no fields here regarding currency; we therefore presume that all amounts are to be reported in the Group reporting currency, rather than underlying treaty currencies.	
Technical Annex B - S_30_04_d_i_LOG	There are no fields here regarding currency; we therefore presume that all amounts are to be reported in the Group reporting currency, rather than underlying treaty currencies.	
Technical Annex B - S_38_01_d_i_LOG		
Technical Annex B - S_40_01_d_i_LOG		
Technical Annex B - S_39_01_c_h_LOG		
Technical Annex B - S_06_03_c_h_LOG		
Technical Annex B - S_09_01_c_h_LOG		
Technical Annex B - S_10_01_c_h_LOG		
Technical Annex B - S_25_04_c_h_LOG		

<b>Comments Template on EIOPA-CP-14-045 Draft proposal for Guidelines on reporting for financial stability purposes</b>		<b>Deadline 02.Mar.2015 23:59 CET</b>
Technical Annex B - S_31_01_c_h_LOG		
Technical Annex B - S_41_01_c_h_LOG		
Technical Annex B - S_02_01_h_LOG		
Technical Annex B - S_05_01_h_LOG		
Technical Annex B - S_06_02_h_LOG		
Technical Annex B - S_08_01_h_LOG		
Technical Annex B - S_23_01_h_LOG		
Technical Annex B - S_01_01_c_d_LOG		
Technical Annex B - S_01_02_c_d_LOG		
Technical Annex C		